



Kentucky Department of
EDUCATION

Kentucky Department of Education

Title I, Part A Handbook

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TITLE I DISTRICT COORDINATOR SUPPORT

Tips for Title I Coordinators

1. Use the [Title I Sample Documents](#) as references and editable templates for uses in meeting selected requirements.
2. Visit the Kentucky Department of Education (KDE) and US Department of Education (ED) Title I webpages at: [KDE Title I, Part A](#) and [ED Title I, Part A](#).
3. Read your district's most recent Title I grant application in the [Grant Management Application and Planning System](#) (GMAP) and supporting materials (Title I Narrative, Needs Assessment, Budget, etc.). More information on GMAP is available on KDE's [Grant Management Application and Planning System webpage](#) as well as the Help for Current Pages tab within the system.
4. Read the accountability data found in the [School Report Card](#) for your district and its schools for the most recent year.
5. Visit your Title I schools often. Become familiar with their needs assessment, improvement plans and procedures for student selection in a Targeted Assistance Program (TAS), method for providing services and family engagement activities.
6. Visit any non-public schools that may be participating in the Title I program and any local institutions or homes receiving Title I funds for neglected and delinquent youth. Familiarize yourself with the services being provided by the district for those students.
7. Read your district's policies governing family engagement, data collection and use, professional development, financial requirements and the dissemination of annual notices to parents (e.g., School Report Cards and Parents' Right to Know).
8. Use the Title I Coordinator Year-at-a-Glance timeline in [Appendix A](#) as a guidance for your program.
9. Use the Kentucky Department of Education District Set-Aside Guidance in [Appendix G](#) as a guidance for your program.
10. Use the [Allowable Costs and Checklists for Title I, Part A Funds](#) to help determine allowability.

Hints for Organization and Record Keeping

1. Set up your files using KDE's Consolidated Monitoring forms (located on the [Title I, Part A Documents and Resources](#) webpage) as an organizational framework. Maintain current documents that will serve as evidence for each area should the district be monitored.
2. Maintain updated lists of students served in TAS (if applicable), including criteria by which students were selected, date of entry into the program, date of exit and reason for exit (e.g., academic exit, moved, dropped by parent request, etc.).
3. Keep current copies of Schoolwide Program (SWP) and TAS plans on file at the district office.
4. Create a filing system to be used at all participating schools, this will help ensure that all schools are maintaining proper documentation and smooth the process of visiting each Title I school. Some

coordinators provide each school coordinator with a portable file box, files pre-labeled with the necessary sections and tip sheets for each section as to what type of documents should be kept in each folder.

5. Maintain hard copies as well as digital copies of documents whenever possible. Give digital documents and folders titles that make it easy to determine what each item is.

Required Documentation

When a district is monitored by KDE, documentation must be provided showing that the Title I program is being run effectively. A list of required documentation can be found on the monitoring checklists available on KDE's [Title I, Part A Documents and Resources](#) webpage. Contact a [KDE consultant](#) to verify other allowable forms of documentation.

Editable Templates

Editable templates and sample documents can be downloaded from the [Title I, Part A Sample Documents](#) folder on the [Title I, Part A Documents and Resources](#) webpage. Districts may customize these documents or create their own. The following documents are included in the folder:

- Non-Public Schools
 - Eligibility List for Title I – Private School Students
 - End of Year Title I Survey – Private School Teachers
 - Letter of Notification and Participation Survey
 - Memorandum and Parent Surveys
- Parent and Family Engagement
 - Notification of Right to Request Teacher Qualifications
 - Parent Notification Regarding Certification and Licensure Status of Teacher
 - Sample Notice on Testing Transparency
 - Sample School Compact Signature Form
- Targeted Assistance Program
 - Student Eligibility List
- Time and Effort
 - Personnel Activity Report Template
 - Sample Semi-Annual Certification

TITLE I, PART A, PROGRAM REQUIREMENTS

ESSA, Title I, Part A

Sections 1111, 1112, 1113, 1114, 1115, 1116, 1117, 1118, 1119

The purpose of this title is to provide all children with significant opportunity to receive a fair, equitable and high-quality education, and to close educational achievement gaps. Title I, Part A, Improving Basic Programs is operated by local education agencies and can be referenced within [ESSA regulations](#).

District Requirements

- 1. School Attendance Areas:** A district must rank order all its school attendance areas based on the percent of low-income children. The district must serve, in rank order of poverty, its schools above 75% poverty. ESSA 1113(a)(6) outlines an exception to these ranking and serving rules. Districts with a total enrollment of less than 1,000 children are not subject to ranking and serving requirements, including the 75% rule. After schools above 75% poverty are served, the district has the option to (a) continue with the district-wide ranking or (b) rank remaining schools by grade span grouping. There is an exception to the ranking rule: a district may lower the poverty threshold to 50% for high schools. Districts are not required to serve high schools above 50% poverty, and this is optional. If a district elects to use the exception, all high schools at or above 50% poverty must be served before elementary and middle schools with less than 75% poverty.
- 2. Allocations:** A district must allocate Title I, Part A funds to participating schools based on Title I, Part A allocation procedures. Districts serving any school below 35% low-income must allocate Title I, Part A funds to participating schools based on a minimum per pupil amount using the 125% rule. The 125% rule refers to the requirement of ESSA 1113(c)(2)(A) which states that if the poverty rate of any school being served with Title I funds is below 35%, all schools must be served with a per-pupil amount (PPA) that is at least 125% of the district's allocation per low-income child. The minimum required PPA (based on the 125% rule) is calculated automatically on the GMAP PPA page for districts serving schools below 35% poverty.
- 3. Children from Local Institutions for Neglected Children:** A district must set aside funds for the educational needs of children in local institutions for neglected children. Funds for service to the institution should be included in the district set-aside before funds are allocated to schools. See [the neglected and delinquent section](#) for more information on how Title I funds are used to serve children in neglected and delinquent institutions.
- 4. Homeless Children:** Districts must provide services for homeless children who attend Title I and non-Title I schools, including providing educationally related support services to children in shelters. The services in non-Title I schools must be comparable to those provided to children in Title I schools. A district must reserve "such funds as may be necessary" (see ESSA 1113(c)(3)(A)) to serve homeless children attending both Title I and non-Title I schools (regardless of receiving a McKinney-Vento Homeless Assistance Grant). Funds must be reserved even if all schools in the district are Title I schools. The reserved funds must address the educational needs of the homeless students and must consider homeless students enrolled in private schools, institutions for neglected children, and local institutions for delinquent

youths. See [the homeless children and youth section](#) for more information on how Title I, Part A funds are used to serve homeless children and youth.

- 5. Private School Children:** A district must provide eligible private school children, their families and teachers with Title I, Part A educational services that are equitable to those provided to eligible public school children, their families and teachers. These services must be determined in consultation with private school officials. See the [services to eligible private school children section](#) for more information on how Title I, Part A funds are used to provide equitable services to eligible private school children.
- 6. Preschool Programs:** Preschool programs supported by Title I, Part A funds must also meet, at a minimum, the education performance standards of the [Head Start performance standards](#) that are aligned with the [Head Start Child Early Learning Outcomes Framework Ages Birth to Five \(2015\)](#).
- 7. Parent and Family Engagement:** A district with an allocation over \$500,000 must reserve at least 1% of its allocation in the district set-asides for parent and family engagement activities and must distribute 90% of that 1% to Title I schools to be spent that school year. A proportionate amount of the private school allocation must be used for parent and family engagement for parents of participating private school students. Each district receiving funds under Title I, Part A must develop a written parent and family engagement policy. ESSA 1116(a)(2) specifies that the policy must be developed jointly with, agreed on with, and distributed to parents and family members of participating children. The parent and family engagement policy must include:
 - Overall expectations for parent and family engagement;
 - Components for building capacity for more effective parent and family engagement; and
 - An annual evaluation of the content and effectiveness of the parent and family engagement activities in increasing participation of parents and whether there are barriers to greater participation.

See [the parent and family engagement section](#) for more information on how Title I, Part A funds are used to increase parent and family engagement.

- 8. Paraeducators:** Districts must ensure that all paraeducators working in a program supported with Title I funds meet one of the following requirements as outlined in [34 CFR 200.58](#):
 - Completed at least 2 years of study at an institution of higher education;
 - Obtained an associate’s (or higher) degree; **OR**
 - Met a rigorous standard of quality and can demonstrate, through a formal state or local academic assessment – knowledge of, and the ability to assist in instructing, as appropriate, reading/language arts, writing and mathematics; or knowledge of, and the ability to assist in, instructing, reading readiness, writing readiness, and mathematics readiness, as appropriate.

See [the paraeducator section](#) for more information on the role of paraeducators in Title I schools.

- 9. Teachers:** Districts must ensure that all teachers working in a program supported with Title I funds meet applicable state certification and licensure requirements, including any requirements for certification obtained through alternative routes to certification [ESSA 1111(g)(2)(J).]

- 10. Access to Teachers:** Districts must ensure that Title I, Part A funds received under ESSA 1111(g)(1)(B) will be used to identify that any low-income and minority children enrolled in schools assisted under Title I, Part A are not served at disproportionate rates, as compared to non-Title I schools, by ineffective, out-of-field, or inexperienced teachers. Districts must also work in consultation with the state to improve any identifiable gaps between the rates of students taught by ineffective, out-of-field, or inexperienced teachers at Title I and non-Title I schools. Please contact [Scott Tremoulis](#) with questions or for further information.
- 11. Staff Paid with Title I, Part A Funds:** Title I-paid staff, including teachers, paraeducators, instructional facilitators, resource specialists, guidance counselors, parent involvement liaisons and other staff, as appropriate, to address student needs identified in the needs assessment, may assume limited duties that do not meet the intent and purpose of Title I based on identified needs (hereafter, non-Title I duties) or that do not benefit participating children that are assigned to similar personnel, provided the time Title I staff spend on such duties is the same proportion of total work time assigned to similar non-Title I staff. This applies to all Title I-paid staff at the district level as well as in schoolwide program schools and targeted assistance schools. Title I staff in a program supported with Title I funds may assume limited non-Title I duties that are assigned to staff in a program not supported with Title I funds. Assigning an amount of non-Title I duties to Title I staff that is not proportionate to non-Title I staff would not meet the intent of the Title I, Part A program. Time and effort reporting must be maintained for all staff paid fully or partly from Title I funds. See the [time and effort section](#) for more information on time and effort reporting.
- 12. Maintenance of Fiscal Effort:** A district may receive Title I, Part A funds for any fiscal year only if either its combined fiscal effort per student or the aggregate expenditures of the district and the state with respect to the provision of free public education by the district for the preceding fiscal year is not less than 90% of the combined fiscal effort or aggregate expenditures for the second preceding fiscal year.
- 13. Comparability:** A district must meet the comparability requirement as follows: A district may receive Title I, Part A funds only if it uses state and local funds to provide services in Title I, Part A schools that are at least comparable to the services provided in schools that are not receiving Title I, Part A funds. Additional information on comparability and KDE's comparability report process is available in the [Comparability Report Guide](#).
- 14. Supplement Versus Supplant:** A district may use Title I, Part A funds only to supplement the funds that would, in the absence of Title I, Part A funds, be made available from non-federal sources for the education of children participating in Title I, Part A programs. ESSA 1118(b)(2) changed the way that districts demonstrate compliance with the Supplement Not Supplant requirement. The LEA must demonstrate that the methodology in which state and local funds are distributed to each school receiving Title I funds ensures that the schools receive all of the state and local funds they would otherwise receive if they were not receiving Title I funds. Funds must be distributed in a Title I-neutral manner; the LEA cannot determine the amount of state and local funds allocated to a school based on the school's Title I allocation. The Supplement Not Supplant Methodology must be updated annually and kept on file at the district office. A method of evaluation must:
- Reflect staffing allocations with real calculations and numbers to support it;

- Account for distribution of state and local funds, including staff, resources and services, in a Title I-neutral manner;
- Be supported with documentation; and
- A narrative to clarify allocation steps.

The following exemptions would apply. In these cases, a supplement, not supplant methodology would not be required.

- A district with only one school (The district would be exempt as a whole.);
- A grade span with a single school (The single-school grade span would be exempt.); or
- Serves all schools with Title I allocations (The district would be exempt as a whole if every school is served. If all schools within a grade span is served, that grade span would be exempt.).

15. Carryover Funds: For districts with Title I, Part A allocations of \$50,000 or more, carryover funds on Sept. 30 are limited to no more than 15%. A state education agency (SEA) may grant a one-time waiver of the percentage limitation during a three-year period upon written request of a district if it determines the request is reasonable and necessary or if supplemental appropriations become available. A school district that is interested in obtaining a waiver of the carryover limitation in section 1127(a) so that it may carry over more than 15% of its Title I, Part A, Subpart 2 allocation must apply to its SEA in accordance with the SEA’s regular procedures for granting a waiver of the carryover limitation. Districts must submit requests for a waiver of the carryover limitation to KDE in writing via email. KDE sends a reminder notification to districts each year alerting them when the window to request waivers is open. The reminder is sent in the Commissioner’s Monday Message as well as emailed directly to district Title I coordinators. The notification provides further instructions to districts that wish to request a waiver. Additional information and guiding questions to help districts create a written process for monitoring the expenditure of funds to meet the carryover limitation are available in the [Title I Carryover Information document](#).

16. Transferability of Funds: A district may transfer up to 100% of funds from other federal programs (Title II, Part A; and Title IV, Part A) into Title I, Part A. A district may not transfer Title I, Part A funds into other federal programs.

17. Records: Records must be maintained at both the school and district level for a period of three years from the date of submission of the final expenditure report; for a total of five years per [2 CFR 200.334](#). Records can be maintained electronically per [2 CFR 200.336](#).

Program Monitoring

As part of its responsibility for Title I, Part A, KDE is required to monitor districts’ program implementation. Title I, Part A programs are monitored annually through desk monitoring and the [Statewide Consolidated Monitoring Process](#). Districts are selected for monitoring based on several risk factors according to the requirements of [2 CFR 200.332\(b\)](#). These factors include the size of the Title I award, timely submission of the consolidated application and other documents, length of time since the district was last monitored, and others.

The purpose of monitoring is to examine the alignment of the Title I program with the approved application and other statutory and regulatory requirements. KDE consultants use monitoring checklists to review evidence submitted by the district as well as information shared during interviews to evaluate the program. The evaluation is summarized in district and school level reports outlining strengths, recommendations and actionable items. KDE consultants will work with the district to address any actionable items.

The following monitoring checklists are used by KDE consultants when monitoring the Title I, Part A program. The checklists also can serve as a self-assessment for districts and schools not being monitored to ensure program requirements are being met.

- [Desk Monitoring Checklist](#)
- [District Consolidated Monitoring Checklist](#)
- [Schoolwide Program Consolidated Monitoring Checklist](#)
- [Targeted Assistance Program Consolidated Monitoring Checklist](#)

SCHOOLWIDE PROGRAM REQUIREMENTS

ESSA, Title I, Part A, Sections 1114 and 1119

This section should be used for assistance in establishing a schoolwide program in your local educational agency (LEA). You can also find guidance released by the U.S. Department of Education (USED) at the following links:

- [Supporting School Reform by Leveraging Federal Funds in a Schoolwide Program](#)
- [Guidance Portal — Office of Elementary and Secondary Education](#)

Definition: A school with at least 40% low income is eligible to plan and implement a schoolwide program (SWP). A schoolwide program must upgrade the entire educational program in the school in order to raise academic achievement for all students.

An LEA may operate a schoolwide program in a school with less than 40% poverty in order to allow the LEA to implement interventions aligned with turnaround principles or an intervention that is based on the needs of the school's students.

Schoolwide Program Checklist:

Is based on one year of planning and is built on schoolwide reform strategies, rather than on separate add-on services.

Provides flexibility in spending federal, state and local funds as long as the school engages in strategies that increase the amount and quality of learning time and help provide a high-quality curriculum for all children, according to a comprehensive school improvement plan [also referred to as a Schoolwide Program (SWP) plan] to help children meet Kentucky's standards.

Focuses on results. The flexibility in the use of funds must result in increased achievement by student populations (economically disadvantaged, racial and ethnic groups, students with disabilities and students with limited English proficiency).

Meets at least one of the following qualifications:

1. A Title I school with 40% or more of its students living in poverty, regardless of the grades it serves.
2. A Title I school under 40% poverty that receives a state waiver (see note below) or was served the previous school year as a schoolwide program and the LEA wishes to continue services for a school that dipped below 40% poverty using the grandfather clause.

Note: The Kentucky Department of Education has the authority to allow a Title I school to operate a schoolwide program without meeting the 40% poverty threshold if it is determined that a schoolwide program will best serve the needs of students in the school who are failing, or at risk of failing, to meet the challenging state academic standards. (ESSA sections 1114(a)(1)(B) and (b)(6)). Please contact [David Millanti](#) for more information.

Schoolwide Program Plan Core Components

There are three core components required by statute for effective implementation of a schoolwide program (SWP): conducting a comprehensive needs assessment; preparing a comprehensive schoolwide plan; and annually reviewing and revising, as necessary, the schoolwide plan. Each component must be described in the SWP plan.

COMPREHENSIVE NEEDS ASSESSMENT

The goal of the needs assessment is to use academic data for the entire school and stakeholder feedback to determine the subjects and skills for which teaching and learning need to be improved, as well as gain a better understanding of the root causes of the identified needs. ESSA 1114(b)(6) requires each school operating an SWP develop a plan based on a comprehensive needs assessment and the specific functions of the needs assessment are outlined in [34 CFR 200.26\(a\)](#).

A school operating an SWP must conduct a comprehensive needs assessment of the entire school that –	34 CFR 200.26(a)(1)
<ul style="list-style-type: none"> • Is based on academic achievement information about all students in the school, including all groups under ESSA 1111(c)(2), relative to Kentucky’s challenging academic standards under 34 CFR 200.1 to – <ul style="list-style-type: none"> ○ Help the school understand the subjects and skills for which teaching and learning need to be improved; and ○ Identify the specific academic needs of students and groups of students who are failing, or are at risk of failing, to meet Kentucky’s challenging academic standards; and • Assesses the needs of the school relative to each of the components of the SWP under ESSA 1114(b)(7). 	200.26(a)(1)(i) 200.26(a)(1)(i)(A) 200.26(a)(1)(i)(B) 200.26(a)(1)(ii)
<ul style="list-style-type: none"> • The comprehensive needs assessment must be developed with the participation of individuals who will carry out the SWP plan. [See also ESSA 1114(b)(2)] 	200.26(a)(2)
<ul style="list-style-type: none"> • The school must document how it conducted the needs assessment, the results it obtained, and the conclusions it drew from those results. [See also ESSA 1114(b)(3)] 	200.26(a)(3)

COMPREHENSIVE SCHOOLWIDE PLAN

The data gathered during the needs assessment is used to develop a plan describing how the school will improve academic achievement and address the identified needs throughout the school, but particularly for the lowest-achieving students (ESSA 1114(b)(7)). The required components of an SWP plan are found in ESSA 1114(b) and [Supporting School Reform by Leveraging Federal Funds in a Schoolwide Program](#).

An eligible school operating an SWP must develop a comprehensive plan that –	ESSA 1114(b)
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<ul style="list-style-type: none"> • Is developed during a 1-year period. 	ESSA 1114(b)(1)
<ul style="list-style-type: none"> • Is developed with the involvement of stakeholders (parents, community members and individuals who will carry out the SWP). 	ESSA 1114(b)(2)
<ul style="list-style-type: none"> • Remains in effect for the duration of the school’s participation in the Title I, Part A program. • Must be regularly monitored and revised as necessary based on student needs. 	ESSA 1114(b)(3)
<ul style="list-style-type: none"> • Is available to stakeholders, is in an understandable and uniform format, and provided in a language that the parents can understand (where practicable). 	ESSA 1114(b)(4)
<ul style="list-style-type: none"> • If appropriate and applicable, an SWP should be developed in coordination and integration with other federal, state and local services, resources and programs, such as: programs supported under ESSA, violence prevention programs, nutrition programs, housing programs, Head Start programs, adult education programs, career and technical education programs; and schools implementing comprehensive support and improvement activities or targeted support and improvement activities under ESSA 1111(d). 	ESSA 1114(b)(5)
<ul style="list-style-type: none"> • Is based on a comprehensive needs assessment. 	ESSA 1114(b)(6)
<ul style="list-style-type: none"> • Includes a description of – <ul style="list-style-type: none"> ○ The strategies that will be implemented to address school needs and how the strategies will: <ul style="list-style-type: none"> ▪ Provide opportunities for all children. ▪ Use methods and instructional strategies that strengthen the academic program, increase the amount and quality of learning time and help provide an enriched and accelerated curriculum. ▪ Address the needs of all children in the school. A suggested list of activities to address need in an SWP can be found in ESSA 1114(b)(7)(A)(iii). 	ESSA 1114(b)(7)

EVALUATION

ESSA 1114(b)(3) states that the plan and its implementation shall be regularly monitored and revised as necessary based on student needs to ensure that all students are provided opportunities to meet Kentucky’s challenging academic standards and ensure continuous improvement. [34 CFR 200.26\(c\)](#) explains that any revisions to the plan should be based on the results of the evaluation.

A school operating an SWP must –	34 CFR 200.26(c)
<ul style="list-style-type: none"> • Regularly evaluate the implementation of, and results achieved by, the SWP, using data from Kentucky’s annual assessments and other indicators of academic achievement; 	200.26(c)(1)

<ul style="list-style-type: none"> Determine whether the SWP has been effective in increasing the achievement of students in meeting Kentucky’s academic standards, particularly for those students who had been the furthest from achieving the standards; 	200.26(c)(2)
<ul style="list-style-type: none"> Revise the plan, as necessary, based on the results of the evaluation, to ensure continuous improvement of students in the SWP 	200.26(c)(3)

Examples of Effective Program Design

The design of a schoolwide program should reflect evidence-based reform strategies that are directly aligned with the findings of the comprehensive needs assessment. The program design may vary to meet the different needs of grade levels and content areas in the school. All federal, state and local resources (staff, materials, labs, computers, professional development, etc.) must be coordinated to improve student achievement. The following examples may be included in a school’s program design:

1. Resource teachers to model effective instruction, provide on-going professional development, assist in strengthening lesson plans to reflect the [Kentucky Academic Standards](#) and provide guidance on curriculum alignment. The teachers could address needs such as writing, reading in the content area and integrating arts/humanities and practical living into the classroom.
2. Content specialist in a computer lab to collaborate with the classroom teacher on using a variety of strategies to answer open response items; developing writing prompts; using spread sheets and graphs; and finding computer programs that address higher-level thinking skills. The content specialist could address identified needs such as writing, technical reading, reading comprehension and problem solving.
3. Science/math lab teacher to develop hands-on activities and experiments to enhance/expand instruction.
4. Extended kindergarten to provide early intervention that aligns with primary instruction.
5. Specific academic, evidence-based models aligned with the school’s needs assessment that provide early intervention strategies.
6. Total school restructuring efforts based on evidence-based process models that are goal-oriented and based on setting high expectations.
7. Software programs that coordinate with student performance standards and that expand higher-order thinking skills.
8. Parent coordinator to train teachers and parents, develop community partnerships and coordinate with family literacy programs and Family Resource and Youth Service Centers to help meet instructional needs of students.
9. Intersession programs for year-round schools, summer school, expanded or extended day programs.
10. Classroom programs or evidence-based models that improve students’ academic achievement.

Effective Schoolwide Programs

High-Poverty Schools and Effective Schoolwide Programs

- High concentrations of poverty can negatively impact the academic achievement of all students at a school.
- For the lowest-achieving students in the highest poverty schools to meet high standards of performance, the school's entire instructional program, not just a separate Title I program, must be substantially improved.
- Educators in highly successful schools expect high academic achievement from every child.
- When an entire school is the target of change, schools serving disadvantaged youth can achieve success.

Common Characteristics of Effective Schoolwide Programs

An effective schoolwide program brings all federal, state and local resources together to improve the instructional program in order to impact student achievement. All federal, state and local resources address the required components of a schoolwide program. Even though schoolwide programs vary from one school to another, effective schoolwide programs have the following characteristics:

Agreed-Upon Vision

All staff should ...

- Share a common vision for all students.
- Make decisions based on a comprehensive needs assessment.
- Integrate your Title I activities in the Comprehensive School Improvement Plan.
- Coordinate resources from all federal, state and local programs.

Academic Focus

All staff should ...

- Focus on early childhood intervention.
- Use systematic, evidence-based academic models that are matched to the needs of the students.
- Devise appropriate modifications and differentiate instruction to accommodate students' strengths and weaknesses.
- Integrate disciplines and specializations in thematic units, promoting reading and mathematics learning through explorations, writing and problem-solving around content themes.
- Use computers and other technology as instructional tools.
- Emphasize building student self-concept, cultural pride and community identity.
- Use art, writing, reading and other integrated experiences for students to learn social studies and science through projects.
- Closely align professional development (PD) with school goals, needs assessment and the improvement plan.

- Visit other classrooms and discuss curriculum issues across grade levels/teams.
- Analyze student data to identify achievement gaps in subpopulations.

Management and Organizational Structure

All staff should ...

- Be accountable for all students.
- Not isolate Title I from the rest of the school.
- Intensify small group instruction within the classroom and assist classroom teachers to strengthen lessons.
- Be included in the planning and management phases.
- Manage programs by a committee that includes teachers, parents and administrators.

Project Design

All staff should ...

- Deliberately design approaches emphasizing critical thinking skills.
- Design programs that include all disciplines in the academic program.

Parent and Family Engagement

All staff should ...

- Recruit and encourage parents to become partners in learning, actively engage parents in planning and learning and target school-parent programs to the needs of the community and families.
- Encourage parents to be more than volunteers; parents participate in planning, review and evaluation of the program as well as school activities and organizations.
- Communicate with parents to maximize instructional time for students and foster a team effort.
- Follow a philosophy that school is a place where parents, as well as children, can learn and that entire families should use school facilities to meet their needs.
- Communicate information to parents through their native language.
- Provide examples of classroom events (e.g., video tapes, newsletters, open house and display of student work) for parents in order to broaden their understanding of the program.
- Be willing to provide transportation and childcare services for parents to participate in school activities.
- Develop partnerships with local businesses and community groups to foster successful schools.

Personnel and Items Within a Schoolwide Program

School Allocation: The district must allocate funds to school attendance areas identified as eligible and selected to participate in rank order based on the percent of low-income students. The school allocation is determined by a per-pupil amount times the total number of children from low-income families in each school. Funds are allocated for use by the school, but it remains the responsibility of the district to ensure

compliance of school expenditures.

Eligible Children: The school is not required to identify particular children. All children are to be provided with the opportunity to meet the academic expectations. The focus is on the instructional program instead of particular children.

Needs Assessment: As a part of comprehensive school improvement and SWP planning, the school conducts a needs assessment of all children in the school based on their performance toward meeting the academic expectations. The needs assessment should identify priority needs in student performance in the well-rounded subjects of English, reading/language arts, mathematics, science, world languages, civics and government, economics, arts, history and geography. The priority needs identified must determine how resources are used.

Teachers in a Schoolwide Program: The focus of a schoolwide program is to raise the performance level of all students by improving the overall instructional program in the school through the integration of federal, state and local funds. Regardless of funding, all teachers:

- Must address identified needs through the comprehensive needs assessment;
- Assist the school in increasing the effectiveness of the staff, parents, community and agencies in improving the school's performance; and
- Should meet state certification requirements [See ESSA 1112 (c)(6).] Parents must receive notice when their child is taught for four consecutive weeks by a teacher that does not meet state certification standards. [See ESSA 1112(e)(B)(li).]

Paraprofessionals in a Schoolwide Program: Under ESSA 1111(g)(2)(J), all teachers and paraprofessionals working in a program supported with Title I funds meet applicable state certification and licensure requirements. ESSA 1111(g)(2)(M) requires states have professional standards for paraprofessionals working in a program supported with Title I funds, including qualifications that were in place on the day before the date of the enactment of ESSA. These requirements are outlined [34 CFR 200.58](#) and state that all paraprofessionals with instructional duties in a schoolwide program must have a secondary school diploma or its recognized equivalent and must:

- Have completed at least 2 years of study at an institute of higher education;
- Have obtained an associate's (or higher) degree; and
- Met a rigorous standard through the Kentucky Paraeducator Assessment.

Paraprofessionals also must be under the direct supervision of a teacher who has primary responsibility for providing instructional services. The following is considered to be direct supervision of a teacher:

- The teacher prepares the lessons and plans the instructional support activities the paraprofessional carries out and evaluates the achievement of the students with whom the paraprofessional is working; and
- The paraprofessional works in close and frequent proximity with the teacher.
- The paraprofessional does not get pulled to be a substitute teacher in a classroom.

A program where a paraprofessional provides instructional support and a teacher visits a site once or twice a

week, but otherwise is not in the classroom, would be inconsistent with the requirement that paraprofessionals work in close and frequent proximity to a teacher. A program where a paraprofessional works with a group of students in another location while the teacher provides instruction to the rest of the class also would be inconsistent with the requirement that paraprofessionals work in close and frequent proximity to a teacher.

Because paraprofessionals provide instructional support, they should not be creating lessons for whole group instruction or introducing new skills, concepts or academic content to the whole class. Paraprofessionals working in a schoolwide program may:

- Participate in general professional development and school planning activities beyond those required for paraprofessionals;
- Provide one-on-one tutoring at a time when a student would not otherwise receive instruction from a teacher;
- Provide assistance in a computer lab;
- Conduct parent and family engagement activities;
- Act as a translator; or
- Provide instructional services to students under the direct supervision of a teacher.

Parent and Family Engagement: A written parent and family engagement policy at the school level must be developed jointly with, agreed upon, and distributed to all parents. The parent and family engagement policy must include:

- Expectations for parent and family engagement;
- Components for building capacity for more effective parent and family engagement; and
- School-family compacts, outlining shared responsibilities for high student performance.

Using Other Funds and Consolidation of Funds

Using Other Federal Funds in a Schoolwide Program

The following are some examples of how funds from other federal programs may be utilized in a schoolwide program. The intent and purposes of the included programs must be met.

1. A secondary school may use funds received under the Carl D. Perkins Vocational and Technology Education Act to support its schoolwide program if its program improves vocational education in the school (for example, by integrating academic and vocational education) and its program improves access to vocational education for special populations in the school.
2. A schoolwide program school may use funds received under Title II, Part A, Teacher and Principal Training and Recruiting Fund to provide the school with a sustained and intensive high-quality professional development program for school staff in core academic subjects that is aligned with Kentucky's content and performance standards, that reflects recent research on teaching and learning, and incorporates methods and practices to meet the educational needs of diverse student populations.

3. A school may use funds received under Title III, Language Instruction for English Learners and Immigrants to support its schoolwide program provided the program implements a bilingual education or special alternative instruction program that reforms, restructures and upgrades the programs and operations that serve limited English proficient children and youth in the school.

Consolidating Federal, State, and Local Funds in a Schoolwide Program

By making systemic changes that knit together services funded from a variety of sources into a comprehensive framework, schools have a better chance of increasing the academic achievement of all students. To encourage this approach and better leverage all available funding, a schoolwide program school has the flexibility to consolidate funds from Title I and other federal education programs with state and local funds. (ESSA section 1114(a)(1), (3)).

By consolidating funds in a schoolwide program, a school can more effectively design and implement a comprehensive plan to upgrade the entire educational program in the school as informed by the school's comprehensive needs assessment. When a school consolidates funds in a schoolwide program, those funds lose their individual identity and the school may use the funds to support any activity of the schoolwide program without regard to which program contributed the specific funds used for a particular activity.

Advantages of Consolidating Funds in a Schoolwide Program

- Flexibility to allocate all available resources effectively and efficiently.
- A school is not required to meet most of the statutory and regulatory requirements of the specific federal programs included in the consolidation, provided it meets the intent and purposes of those programs.
- A school is not required to maintain separate fiscal accounting records by federal program that identify the specific activities supported by each program's funds.

NOTE: A schoolwide program school has flexibility in its use of Title I funds even absent consolidation. The uses of Title I funds described throughout this document are available to a schoolwide program school that does not consolidate its Title I or other federal funds. Consolidation, however, affords even greater flexibility, as discussed above.

The following guidance documents contain additional information on consolidation of funds that may be useful for schools operating schoolwide programs:

- [Guidance Portal—Office of Elementary and Secondary Education](#)
- [Title I Fiscal Issues, pp. 49-63 \(Feb. 2008\)](#) (Provides information on consolidating funds in a schoolwide program.)
- [Notice Authorizing Schoolwide Programs to Consolidate Federal Education Funds and Exempting Them From Complying With Statutory or Regulatory Provisions of Those Programs, 69 FR 40360-64 \(July 2, 2004\)](#) (Provides information regarding which federal education programs may be consolidated in a schoolwide program and how a school can ensure it meets the intent and purposes of the federal programs included in the consolidated schoolwide program.)

Flexibility of Funds in a Schoolwide Program

Consistent with the benefits identified above, a school operating a schoolwide program may use Title I funds for any activity that supports the needs of students in the school as identified through the comprehensive needs assessment and articulated in the schoolwide plan (ESSA section 1114(b)). In designing and implementing the schoolwide plan, a school must implement strategies that: **(1)** Provide opportunities for all children to meet challenging state academic standards; **(2)** Use methods and instructional strategies that strengthen the academic program in the school, increase the amount and quality of learning time, and help provide an enriched and accelerated curriculum, which may include programs, activities and courses necessary to provide a well-rounded education; and **(3)** Address the needs of all students, but particularly those at risk of not meeting challenging state academic standards (ESSA section 1114(b)(7)(A)).

Examples of Uses of Funds in a Schoolwide Program (Based on needs assessment)

- High-quality preschool or full-day kindergarten and services to facilitate the transition from early learning to elementary education programs.
- Recruitment and retention of effective teachers, particularly in high-need subjects.
- Instructional coaches to provide high-quality, school-based professional development.
- Increased learning time.
- Evidence-based strategies to accelerate the acquisition of content knowledge for English learners.
- Activities designed to increase access and prepare students for success in high-quality advanced coursework to earn postsecondary credit while in high school (e.g., Advanced Placement, International Baccalaureate, early college high schools, and dual or concurrent enrollment programs).
- Career and technical education programs to prepare students for postsecondary education and the workforce.
- Counseling, school-based mental health programs, mentoring services and other strategies to improve students' nonacademic skills.
- School climate interventions (e.g., anti-bullying strategies, positive behavior interventions and supports).
- Equipment, materials and training needed to compile and analyze student achievement data to monitor progress, alert the school to struggling students and drive decision-making.
- Response-to-intervention strategies intended to allow for early identification of students with learning or behavioral needs and to provide a tiered response based on those needs.
- Activities that have been shown to be effective at increasing family and community engagement in the school, including family literacy programs.
- Devices and software for students to access digital learning materials and collaborate with peers, and related training for educators (including accessible devices and software needed by students with disabilities).

Examples of Uses of Funds in a Schoolwide Program (Based on needs assessment)

- Two-generation approaches that consider the needs of both vulnerable children and parents, together, in the design and delivery of services and programs to support improved economic, educational, health, safety and other outcomes that address the issues of intergenerational poverty.

The above table provides examples of some of the potential uses of funds available to schools when operating a schoolwide program. Each school, in conjunction with LEA officials, has the discretion to determine the specifics of a schoolwide plan, including which methods and instructional strategies will be used, based on the school's identified needs in its comprehensive needs assessment.

See Also

For specific questions or items concerning the setup of your schoolwide program, you can view other guidance released by the Kentucky Department of Education. A short list is provided below.

1. [Preschool Section](#) of this handbook
2. [Title III Section](#) of this handbook
3. [Neglected and Delinquent Section](#) of this handbook
4. [KDE Guidance for Districts on Set-Asides](#)
5. Title I monitoring checklists for required documentation located on the [Title I, Part A Documents and Resources](#) page

TARGETED ASSISTANCE SCHOOL REQUIREMENTS

ESSA, Title I, Part A, Sections 1115 and 1119

Definition: A targeted assistance school (TAS) must use funds only for programs that provide supplemental services for Title I identified children. The goal of a targeted assistance school is to improve teaching and learning to enable Title I, Part A participants to meet the academic standards that all children are expected to master.

School Allocation: The district must allocate funds to school attendance areas identified as eligible and selected to participate in rank order based on the percent of low-income students. The school allocation is determined by a per-pupil amount times the total number of children from low-income families in each school. Funds are allocated for use by the school, but it remains the responsibility of the district to ensure compliance of school expenditures.

Eligible Children: The school identifies children who are failing or most at risk of failing to meet Kentucky's challenging academic standards and having the greatest academic need. Children who are economically disadvantaged, children with disabilities, migrant children, homeless children and limited English proficient children are eligible for Title I, Part A services on the same basis as other children that are selected for services.

From the list of eligible children, the school selects those children who have the greatest need for special assistance to receive Title I, Part A services in the identified focus areas. Core academic areas include English, reading/language arts, mathematics, science, world languages, civics and government, economics, arts, history and geography.

Needs Assessment: As a part of comprehensive school improvement planning, the school conducts a comprehensive needs assessment. This determines the focus areas of the Title I, Part A services. A targeted assistance school must identify students who are failing or most at risk of failing to meet state standards. An educational objective measure must be used to determine the students with the greatest academic needs.

Those students with the greatest academic need in the identified focus areas are provided Title I, Part A services. The school must keep on file a list of this ranking of individual students.

Eligible Schools: Schools that qualify to receive funds because they are at or above the district's poverty percentage or between 35% and 40% poverty (depending on how the district qualifies the schools) are eligible to operate targeted assistance programs.

SEVEN COMPONENTS OF A TARGETED ASSISTANCE SCHOOL

1.	Use Title I, Part A resources for supplemental programs to help participating Title I children meet the academic expectations all children are expected to meet.
2.	Ensure that planning for students receiving Title I services is incorporated into existing school planning.
3.	Use effective evidence-based instructional strategies that: <ul style="list-style-type: none"> • Give primary consideration to providing extended learning time such as extended school year, before and after school, and summer programs; • Help provide an accelerated, high-quality curriculum; and • Minimize removing children from the regular classroom during regular school hours.
4.	Coordinate with and support the regular educational program that may: <ul style="list-style-type: none"> • Include services to assist preschool children's transition to elementary school; • If funds are not available from other public or private sources, then funds may be used to provide health, nutrition and other social services if these needs of the targeted students are part of the comprehensive needs assessment; and as a last resort, funds can be used to provide basic medical equipment such as eyeglasses, hearing aids and professional development to assist staff in identifying and meeting the comprehensive needs of eligible children.
5.	Provide professional development opportunities with Title I, Part A resources and to the extent practicable, other sources for administrators, teachers and other school staff who work with participating children.
6.	Provide strategies to increase parent and family engagement, such as family literacy services.
7.	Coordinate and integrate federal, state and local services and programs, including violence prevention, nutrition programs, housing programs, Head Start, adult education, vocational and technical education and job training.

Setting Up a Targeted Assistance Program

Step One

Identify Needs

Guiding Questions

- What is the scope/focus?
- On what content areas will the program focus?
- What grade(s) will be served?
- What method of service delivery will be used?

Needs Assessment

Identify Needs

A school must conduct a comprehensive needs assessment as a part of its School Improvement Plan to determine priority needs. Based on these priority needs, the Title I focus area(s) is determined.

Step Two

Selecting Students

Eligible Population: The eligible population for Title I services is:

- Children not older than age 21 who are entitled to a free public education through grade 12; and
- Children who are not yet at a grade level at which the local educational agency provides a free public education.

Eligible Children: From the population described above, a targeted assistance school identifies children eligible for Title I services who are:

- Children identified by the school as failing, or most at risk of failing, to meet the state's challenging student academic achievement standards;
- Children from preschool through grade 2 selected solely on the basis of criteria such as teacher judgment, interviews with parents and developmentally appropriate measures;
- Children who are economically disadvantaged, children with disabilities, migrant children or limited English proficient children are eligible for Title I services on the same basis as other children selected to receive Title I services;
- Children who, at any time in the 2 years preceding the year for which the determination is made, participated in a Head Start, early childhood education program, or in preschool Title I services;
- Children who, at any time in the 2 years preceding the year for which the determination is made, received services under the migrant program;
- Children in a local institution for neglected or delinquent children and youth or attending a community day program for such children;
- Children who are homeless and attending any school served by the local educational agency.
- A sample eligibility list for Title I, Part A services in a Targeted Assistance Program can be found in the [Title I, Part A Sample Documents](#) folder. Download the Title I, Part A sample documents and select the third file "targeted assistance program."

Children are then selected for Title I Services: From the eligible children, a targeted assistance school selects children for Title I services on the basis of multiple, educationally related, objective criteria established by the district and supplemented by the school.

1. Classroom teachers rate and rank only the eligible students in the focus area identified by the needs assessment.
2. Developmental checklists or other screening instruments may be substituted for the ranking sheets in order to more effectively assess the needs of kindergarten-primary 3 (formerly grade 2) students. These checklists may include such criteria as teacher judgment, interviews with parents and developmentally appropriate measures.
3. The children who are in greatest academic need of assistance are provided Title I services. Each

Selecting Students

school should keep this data on file. The district Title I coordinator should keep a copy of the school's student ranking data.

Note: Title I funds may not be used to provide services that are otherwise required by law to be made available to children in a targeted assistance school. Title I funds may be used to coordinate or supplement such services.

Step Three

Designing the Program

Guiding Questions

- How will services be provided?
- Which program design model is most appropriate for my school/students based on needs (in-class, limited pull out program, extended time)?
- Where will services be provided (in-class, before school or after school)?
- What resources are needed?

In-Class Model: The Title I, Part A funded personnel collaboratively teaches with the regular classroom teacher in order to directly benefit children identified for Title I, Part A services. The focus of collaboration is continuous interaction between classroom and Title I, Part A funded staff to provide appropriate instructional opportunities for all students.

The regular classroom teacher helps all children develop skills, concepts and processes in a particular content area that will enable them to meet the academic expectations.

The Title I, Part A funded teacher or paraeducator supports and reinforces the skills and strategies with identified students. The two staff members work together to ensure that identified students learn skills, strategies and concepts that will enable them to be successful.

Suggestions for effective collaboration include:

- Regular and ongoing collaborative planning between the regular classroom teacher and the Title I, Part A funded staff
- Building an atmosphere of mutual trust between staff members
- Creating a shared vision of how the staff can work together
- Agree upon the mechanics of working together
- Planning lessons that utilize the talents of the staff
- Planning lessons that provide extra benefits to low-achieving students
- Cooperatively solving problems that arise
- Assessing and addressing the special needs of individual students
- Flexibility in delivering Title I, Part A services

Title I, Part A funded staff may collaboratively teach with regular classroom teachers as long as the effort directly benefits identified children. Targeted students must always receive instruction from the regular classroom teacher. Title I, Part A services must supplement and support the regular educational program.

Designing the Program

Limited Pullout Programs: ESSA requires instructional services to be provided by minimizing the removal of Title I, Part A participants from the regular classroom during the regular instructional day.

Schools must determine the needs of their identified students and then implement the most effective instructional strategies to meet those needs.

A limited pullout program provides instructional services for participating children in a different setting and at a different time than would be the case if those children were not participating in Title I, Part A. A limited pullout program meets the supplement, not supplant requirement if all of the following characteristics are met:

- The project is particularly designed to meet participants' special educational needs.
- The classroom teacher, who would be responsible for the provision of instructional services to participating children in the absence of Title I, Part A, remains responsible for, and continues to perform, those duties the teacher would be required to perform in the absence of Title I, Part A, including planning the instructional program of the participating children, providing them with instructional services and evaluating their progress.
- Paraeducators paid with Title I, Part A funds work closely with the regular classroom teacher. The classroom teacher is ultimately responsible for the instructional services to participating children in the absence of Title I, Part A.

Participating students pulled from the regular classroom are receiving additional services from the Title I, Part A staff. Title I, Part A cannot take the place of instruction that is provided by the regular classroom teacher. For example, a student receiving Title I, Part A services in reading cannot be pulled from the regular reading class to receive Title I, Part A services because Title I, Part A would then be taking the place of the regular classroom instruction. This is an example of supplanting.

Step Four

Continuous Improvement/Evaluate the Program

Targeted-Assistance Programs should be evaluated yearly, at a minimum. Things to consider include:

1. Does the plan have a clear direction for the school as to what needs to be done when reviewing the data of the student population?
2. How does the school know the desired results have been achieved?
3. Are the services and resources actually achieving the results expected?
4. What is working and what can be improved?
5. How will success be measured?
6. Are the content areas and student populations being targeted experiencing growth?
7. Are students meeting the State's academic standards?
8. Is high-quality scientifically based research being conducted?

At the end of the review:

1. Re-establish responsibilities, timelines and models needed to implement revised plan.
2. Revise the targeted assistance plan as needed.
3. Go back to Step 1 using revised plan.

PARENT AND FAMILY ENGAGEMENT

ESSA Title I, Part A Section 1116

Involving families as partners in the education process is critical throughout a child's academic career. When families support learning, children are more successful in school, and school success helps children become successful adults. The district must provide opportunities for families to actively participate in the planning, implementation and review of school and district Title I, Part A programs. The following material is meant to provide an overview of the authorizing statute and should be used in conjunction with the U.S. Department of Education (USED) [Non-Regulatory Guidance for Title I Parent Involvement](#).

According to A-3 of ED's 2004 guidance and [20 U.S.C. §7801\(31\)](#), the term "parent" includes a legal guardian or other person standing in *loco parentis* or in place of a parent (such as a grandparent or stepparent with whom the child lives, or a person who is legally responsible for the child's welfare).

Funding Parent and Family Engagement Activities

Any district with an allocation of more than \$500,000 must set aside 1% of its allocation to carry out the required parent and family engagement activities. At least 90% of the funds set aside for parent and family engagement activities must be distributed to the schools. Districts with an allocation of \$500,000 or less are still required to implement the parent and family engagement requirements in the statute but are not required to have a specified minimum expenditure.

ESSA 1116(a)(3)(B) states that parents and family members of children receiving services under Title I ***shall be involved in the decisions*** regarding how funds reserved are allotted for parental involvement activities.

ESSA Section 1116(a)(3)(D) states that funds reserved by the LEA must be used to carry out [evidence-based activities](#) and strategies consistent with the district parent and family engagement policy. Funds must be used for at least one of the following:

- Supporting schools and nonprofit organizations in providing professional development for the LEA and school personnel regarding parent and family engagement strategies, which may be provided jointly to teachers, principals, other school leaders, specialized instructional support personnel, paraprofessionals, early childhood educators, and parents and family members.
- Supporting programs that reach parents and family members at home, in the community and at school.
- Disseminating information on best practices focused on parent and family engagement, especially best practices for increasing the engagement of economically disadvantaged parents and family members.
- Collaborating with, or providing subgrants to schools to enable such schools to collaborate with, community-based or other organizations or employers with a record of success in improving and increasing parent and family engagement.
- Engaging in any other activities and strategies the LEA determines are appropriate and consistent with the district parent and family engagement policy.

Districts providing Title I services to private schools must reserve funds for parent and family engagement activities for parents of participating private school children. The funds must be proportionate to the 1% amount reserved for parent and family engagement in public schools.

Building Capacity for Involvement

ESSA 1116(e)(1-5) explains that to ensure effective engagement of parents, as well support a partnership among the school, parents and the community to improve student academic achievement, **each district and school must:**

- Provide assistance to parents in understanding such topics as the challenging state academic standards, state and local academic assessments, the requirements of Title I and how to monitor a child’s progress and work with educators to improve the achievement of their children;
- Provide materials and training to help parents work with their children to improve their children’s achievement, such as literacy training and using technology (including education about the harms of copyright piracy), as appropriate, to foster parental involvement;
- Educate teachers, specialized instructional support personnel, principals and other school leaders, and other staff — with the assistance of parents — in: the value and utility of contributions of parents; how to reach out to, communicate with and work with parents as equal partners; implement and coordinate parent programs; and build ties between parents and the school;
- Coordinate and integrate, to the extent feasible and appropriate, parent involvement programs and activities with other federal, state and local programs, including public school programs, and conduct other activities, such as parent resource centers, that encourage and support parents in more fully participating in the education of their children;
- Ensure that information related to school and parent programs, meetings and other activities is sent to the parents of participating children in a format and, to the extent practicable, in a language the parents can understand;

ESSA 1116(e)(6-13) provides additional suggestions in building capacity for involvement, stating that the district may:

- Involve parents in the development of training for teachers, principals and other educators to improve the effectiveness of such training;
- Provide necessary literacy training from funds received under Title I if the local educational agency has exhausted all other reasonably available sources of funding for such training;
- Pay reasonable and necessary expenses associated with local parental involvement activities, including transportation and childcare costs, to enable parents to participate in school-related meetings and training sessions;
- Train parents to enhance the involvement of other parents;
- Arrange school meetings at a variety of times, or conduct in-home conferences with teachers or other

educators who work directly with participating to maximize parental involvement and participation among those who are unable to attend such conferences at school;

- Adopt and implement model approaches to improving parental involvement;
- Establish a districtwide parent advisory council to provide advice on all matters related to parental involvement in programs supported under this section;
- Develop appropriate roles for community-based organizations and businesses in parent involvement activities; and
- Provide such other reasonable support for parental involvement activities under Title I as parents may request.

See [Appendix B](#) for a list of resources to improve parent and family engagement.

Recommendations to Develop Effective Parent and Family Engagement

- Recruit and encourage families to become partners in learning; actively engage parents in planning and learning and target school-parent programs to the needs of the community and families.
- Encourage parents to be more than volunteers; parents participate in planning, review and evaluation of the program, as well as school activities and organizations.
- Communicate with parents to maximize instructional time for students and foster a team effort.
- Follow a philosophy that school is a place where parents, as well as children, can learn and that entire families should use school facilities to meet their needs.
- Communicate information to parents through their native language.
- Provide examples of classroom events (e.g., videos, newsletters, open house and display of student work) for parents in order to broaden their understanding of the program.
- Consider Providing transportation and childcare services for parents to participate in school activities.
- Develop partnerships with local businesses and community groups to foster successful schools.

Parent and Family Engagement in Schoolwide Programs and Targeted Assistance Schools

All schools receiving Title I, Part A funds, both Schoolwide Programs (SWPs) and Targeted Assistance Programs (TASs), are required to include a parent and family engagement component in their plan. Section 1114(b)(1)(F) of ESSA state that the schools operating an SWP must provide strategies to increase parent and family engagement in accordance with ESSA Section 1116. Section 1115(c)(1)(G) of ESSA details the same requirement for schools operating a TAS program.

The characteristics and actions of an effective parent and family engagement program should be the same no matter what type of Title I, Part A program is in place. The difference between the two will depend on the specific parents receiving services. Title I, Part A parent and family engagement activities should be geared towards the parents of participating children. All students benefit from funds and services in an

SWP, therefore all parents are the focus of the parent and family engagement efforts. In a TAS, only certain students receive Title I, Part A services, meaning the parents of those students are the ones who should receive parent and family engagement services.

District-Level Parent and Family Engagement Requirements

District Parent and Family Engagement Policy

Each LEA receiving Title I, Part A funds must develop a written parent and family engagement policy. The policy is developed jointly, agreed upon and distributed to parents of participating children (ESSA Section 1116 (a)(2)). The policy should be reviewed with parents of participating students and revised as necessary based on their feedback. Documentation of the review and revisions should be on file in the district Title I coordinator's office.

A written district parent and family engagement policy must establish expectations for parent and family engagement and describe how the district will:

1. Involve parents in the joint development of the district improvement plan outlined in ESSA Section 1112 and the process of school review and improvement under ESSA Section 1116;
2. Provide the coordination, technical assistance and other support necessary to assist participating Title I schools in planning and implementing effective parent and family engagement to improve student academic achievement and school performance;
3. Build the schools' and parents' capacity for more effective parent and family engagement described in ESSA Section 1116(e);
4. Coordinate and integrate parent and family engagement strategies, to the extent feasible and appropriate, with other relevant federal state and local laws and programs;
5. Conduct an annual evaluation of the content and effectiveness of the parent and family engagement policy with parents. The evaluation should include the policy's ability to improve the academic quality of the schools, including identifying barriers to greater participation of parents, the needs of parents and family members to assist with the learning of their children, and strategies to support successful school and family interactions. Parents should be invited to design strategies for more effective parent and family engagement. Particular attention should be given to parents who are economically disadvantaged, are disabled, have limited English proficiency, have limited literacy or are of any racial or ethnic minority background;
6. Use the results of the annual evaluation described in (5) above to design "evidence-based strategies" for more effective parental involvement. The district also must revise the parent and family engagement policy, if needed, based on the results of the evaluation (ESSA Section 1116(a)(2)).
7. Involve parents in the activities of schools receiving Title I, Part A funds.
8. ESSA Section 1116(a)(2)(F) gives districts the option of creating a parent advisory board comprised of a sufficient number and representative group of parents or family members served by the local educational agency to adequately represent the needs of the population served by such agency for the purposes of developing, revising and reviewing the parent and family engagement policy.

[Appendix C](#) provides a complete list of requirements for a district parent and family engagement policy.

Annual Evaluation

The effectiveness of the district parent and family engagement policy in improving the academic quality of all schools served by Title I must be reviewed every year. The evaluation will identify:

- Barriers to greater participation by parents in activities authorized by this section (with particular attention to parents who are economically disadvantaged, are disabled, have limited English proficiency, have limited literacy or are of any racial or ethnic minority background);
- The needs of parents and family members to assist with the learning of their children, including engaging with school personnel and teachers; and
- Strategies to support successful school and family interactions.

Notification of Right to Request Teacher Qualifications

ESSA 1112(e)(1)(A) and [34 C.F.R. Part 200.61](#) (EDGAR) state that at the beginning of the school year, an LEA must notify the parents of each student attending a Title I school that the parents may request, and the LEA will provide the parents on request, information regarding the professional qualifications of the student's classroom teachers, including, at a minimum, the following:

- Whether the teacher has met state qualification and licensing criteria for the grade levels and subject areas in which the teacher provides instruction.
- Whether the teacher is teaching under emergency or other provisional status through which state qualification or licensing criteria have been waived.
- The baccalaureate degree major of the teacher and any other graduate certification or degree held by the teacher, and the field of discipline of the certification or degree.
- Whether the child is provided services by paraeducators and, if so, their qualifications.

This information should be provided to parents in the fall through a general medium such as a letter or included in a parent handbook. A sample notification of the right to request teacher qualifications can be found in the [Title I, Part A Sample Documents](#) folder.

Parent Notification Regarding Certification and Licensure Status of Teacher

The Every Student Succeeds Act (ESSA) requires schools who receive Title I, Part A funds to notify parents or legal guardians when their child has been taught for four consecutive weeks by a teacher who has not met state certification/licensure requirements. [See ESSA 1112(e)(B)(i).] This notification is sent by the school to the class(es) that are being taught by the teacher not meeting state certification/licensure requirements. A sample notification regarding certification and licensure status of a teacher can be found in the [Title I, Part A Sample Documents](#) folder.

Testing Transparency

Each LEA receiving Title I, Part A funds is required by ESSA 1112(e)(2)(A)-(B) to notify the parents of each

student attending any school receiving Title I, Part A funds that parents may request information regarding student participation in any assessments mandated by ESSA 1111(b)(2) and by the state or LEA. The LEA will provide the parents on request (and in a timely manner), the information regarding the assessments, including any state or district policies on student participation, where applicable.

Additionally, the LEA must make widely available through public means (including posting on the LEA website, and where feasible, the website of each school) for each grade served by the LEA, information on each assessment required by the state to comply with ESSA 1111, other assessments required by the state, and assessments required by the LEA, including (where such information is available and feasible to report):

- The subject matter assessed;
- The purpose for which the assessment is designed and used;
- The source of the requirement for the assessment; and
- Where such information is available:
 - The amount of time students will spend taking the assessment, and
 - The schedule for the assessment; and
 - The time and format for disseminating results.

Any LEA operating a district website must publish the information regarding testing transparency on that website in a clear and easily accessible manner. ESSA 1112(e)(2)(C) states that LEAs not operating a website must determine how to make the information widely available (i.e., distribution of that information to the media, through public agencies or directly to parents). The information also may be included in student handbooks, published on individual school websites or letter form. A sample notice on testing transparency can be found in the [Title I, Part A Sample Documents](#) folder.

School Level Requirements

School Parent and Family Engagement Policy

Each school receiving Title I, Part A funds must develop a written parent and family engagement policy. The policy is developed jointly, agreed upon and distributed to parents of participating children. The policy should be reviewed (and revised as needed) jointly with parents of participating children on a regular basis. Documentation of the review and revisions should be on file in the school as well as at the district Title I coordinator's office.

A school's written parent and family engagement policy must establish expectations for parent and family engagement and describe how the school will:

1. Hold an annual meeting, at a convenient time, for the families of participating children. All parents and family members of participating children should be invited and encouraged to attend. The purpose of the meeting is to inform families of their school's participation in the Title I, Part A program and explain the requirements associated with the program, as well as the right of the families to be involved.
2. Offer a flexible number of meeting times for parent and family engagement throughout the school

year (such as before or after school and evenings), and consider providing transportation, childcare or home visits to maximize the number of parents able to attend;

3. Involve parents in an organized, ongoing and timely way in the planning, review and improvement of the Title I, Part A program, including the planning, review and improvement of the school parent and family engagement policy and the joint development of the SWP plan under ESSA Section 1114(b)(2). Families must be notified of the written policy in a format that is easy to understand and in a language the parents can understand. The policy shall be made available to the local community and updated periodically to meet the changing needs of parents and the school.
4. Provide parents of participating children —
 - a. Timely information about Title I, Part A programs;
 - b. School performance reports, including a description and explanation of the school’s curriculum, state academic achievement standards, forms of academic assessment used to measure student progress and the proficiency levels students are expected to meet;
 - c. Their student’s assessment results;
 - d. Additional opportunities for parents to offer suggestions and participate in decisions relating to the education of their children; and
5. If the SWP plan is not satisfactory to the parents of participating children, submit any parent comments on the plan when the school makes the plan available to the LEA.

[Appendix D](#) provides a complete list of requirements for a school parent and family engagement policy. All practices outlined in the policy must be effectively enacted throughout the school year. Developing and implementing processes and procedures surrounding parent and family engagement can help schools ensure all requirements are being met.

Shared Responsibility for High Student Academic Achievement

School-Parent Compact

Each school will jointly develop with parents a school-parent compact that outlines how parents, the entire school staff and students will share the responsibility for improved student academic achievement and how the school and parents will build and develop a partnership to help children achieve the state’s high standards. The compact shall:

1. Describe the school’s responsibility to provide high-quality curriculum and instruction in a supportive and effective learning environment that enables the children served to meet the Kentucky academic standards, and the ways in which each parent will be responsible for supporting their children’s learning; volunteering in their child’s classroom; and participating, as appropriate, in decisions relating to the education of their children and positive use of extra-curricular time; and
2. Address the importance of communication between teachers and parents on an ongoing basis through, at a minimum—
 - a. Parent-teacher conferences in elementary schools at least annually to discuss the compact

- and how it relates to individual student progress and achievement;
- b. Frequent progress reports to families on student academic progress;
- c. Reasonable access to staff and opportunities to volunteer, observe and participate in classroom activities and ensuring regular two-way, meaningful communication between family members and school staff in a language that family members can understand.

As is the case with parent and family engagement policies, no two schools should have identical school-family compacts. See [Appendix E](#) for additional best practice suggestions for the school-family compact.

School-Family Compact Signatures

The Kentucky Department of Education (KDE) requires school-family compacts be signed by all involved parties (school representative, parent/guardian, and student) and kept on file at each school as documentation. Since stakeholders sign the compact itself and turn it in, a best practice is to make a copy of the compact readily available for reference such as in the school handbook or on the school webpage. The language in the Sample Compact Signature Form (located in the [Title I, Part A Sample Documents](#) folder) could be used to collect the necessary signatures and verify all parties have read and agreed to the school-family compact.

SERVICES TO TITLE I ELIGIBLE PRIVATE SCHOOL CHILDREN

ESSA Section 1117

Title I of Every Student Succeeds Act (ESSA) requires public school districts to provide secular, neutral and non-ideological support to private school students, parents and teachers who would be otherwise eligible for Title I services. Services include direct instruction for students, parent and family engagement activities, and professional learning for teachers. This section of the handbook specifically addresses the situations in which Title I funds must be used in support of eligible private school children. This section should be used in conjunction with the following U.S. Department of Education (USED) guidance:

- [Fiscal Changes & Equitable Services Requirements \(Nov 21, 2016\)](#)
- [Providing Equitable Services to Eligible Private School Children, Teachers, and Families \(Oct. 7, 2019\)](#)

Determining Equitable Services

ESSA requires a district to annually offer equitable participation in Title I, Part A services to each private school that has children from participating Title I, Part A attendance areas. The district must offer this participation through timely and meaningful consultation with each private school. Private schools located within or outside the district are eligible to receive services. Home schools are treated as private schools in Kentucky. Title I, Part A provides services to eligible private school children, not funds to private schools.

In ESSA, equitable participation is measured by the amount of funds spent on children, teachers and families; the types of services provided; and the timeliness of services. Low-income private school children living in a participating Title I, Part A attendance area generate funds for services. To be eligible to receive Title I, Part A services, a child must reside within the attendance area of a participating public school and be failing or at risk of failing academic achievement standards. Certain other children may be identified as eligible solely by their status: for example, homeless children and children who in the preceding two years had participated in Head Start, an early childhood education program or a Migrant Education program. Children with the greatest need must be served first.

ESSA section 1117(a)(4)(A) states that private school funding must come off the top of the allocation before any district set asides are allowed or expenditures are made. If transferring funds into Title I, a local educational agency (LEA) must determine the proportionate amount of Title I funds used to provide services based on the total of funds, including those transferred.

Determining the Proportionate Share

Once an LEA has established the participating public school attendance areas ([see B-1 and B-2 of the Providing Equitable Services to Eligible Private School Children, Teachers, and Families \(Oct. 7, 2019\)](#)) it should first determine the number of children from low-income families residing in each participating public school attendance area who attend public schools and private schools. The LEA should then determine the overall proportion of children from low-income families who reside in participating public school attendance areas and who attend public schools and private schools. Using the proportion of children from low-income families who attend private schools, the LEA should determine the amount of funds available for equitable services

based on that proportionate share of the LEA’s total Title I allocation.

Sample Calculations for Determining Equitable Services in Private Schools

District Allocation: \$1,054,706 (serving one private school)

EXAMPLE OF DETERMINING THE AMOUNT OF TITLE I FUNDS FOR EQUITABLE SERVICES			
Participating Public School Attendance Area	Number of Public School Low-Income Children	Number of Private School Low-Income Children	Total Number of Low-Income Children
A	379	4	383
B	341	15	356
C	276	4	280
D	155	1	156
E	146	8	154
F	266	1	267
TOTAL	1563	33	1596
PERCENT	97.93%	2.07%	
PROPORTIONATE SHARE	\$1,032,898	\$21,832	

EXAMPLE OF EQUITABLE SERVICES FOR PARENTS AND FAMILIES OF ELIGIBLE PRIVATE SCHOOL CHILDREN		
1% for parent and family engagement (1% of \$1,032,898)	Proportionate share for private school parent and family engagement (1% of \$21,832)	Remaining funds for private school instruction and professional development
\$10,328.98	\$218.32	\$21,832 - \$218.32 = \$21,613.68

Note: An LEA may calculate the 1% for parent and family engagement from its proportionate share of funds. GMAP performs these calculations upon entering student data within the application.

A provision under ESSA requires that funds received by an LEA that are allocated to services for private school students must “be obligated in the fiscal year for which the funds are received.” The guidance explains that this provision is meant to ensure private school students, teachers and families receive services “in a timely manner.” [2019 Guidance \(B-26 through B-31\)](#).

Reserving Funds for the Administration of Equitable Services

A district may charge administrative costs for its role in the oversight of equitable services, which comes from the portion of funding reserved for non-public schools. Since this reduces the amount available for direct services, an LEA must discuss this reservation during consultation with non-public school officials if it is to be taken.

A district must charge administrative costs when a Title I, Part A-paid staff member oversees all or a portion of equitable services during his/her Title I-paid time. In this case, the person would be paid an amount from the equitable service reservation that is proportionate to the amount of time he/she spends providing such oversight. For example, if a person spends 10% of his/her Title I-paid time on equitable services oversight, 10% of that person’s salary must be paid from the equitable services reservation. Another example might be a

person paid 40% from Title I and 60% general funds, spending 10% of his/her time administering the equitable services. In this instance, the requirement for charging of administrative costs would depend from where that portion of time is paid. If time paid for equitable services administration is paid from Title I, that portion of the person's salary must be charged to the equitable services reservation.

This ensures equitability by charging those costs to the private school reservation, instead of charging them to the public district's portion of funding. Charging those costs to the public district's administrative costs would effectively reduce the amount of services the district and its schools could receive, creating an inequitable distribution of funds.

A portion of a person's salary would not have to be charged to the equitable services reservation if the staff member providing oversight is paid solely from general funds instead of Title I, Part A. There would be no equitability issues since the salary is not charged to Title I, Part A. However, a district may charge a proportionate amount from the equitable services reservation in this instance.

Which Private School Students are Eligible for Services

- Students must reside in the attendance area of the school receiving a Title I, Part A allocation. This applies based on location of residence even if the private school is not located inside the district.
- Students must be identified by the district — not the private school — as failing or most at risk of failing to meet the state's challenging academic achievement standards using multiple, educationally related criteria. This determination should be worked out during consultation between the private and public school officials. A sample eligibility list for Title I services can be found in the [Title I, Part A Sample Documents](#) folder. If all students cannot be served, students must be ranked and served based on greatest academic need.

Delivery of Service

ESSA does not require specific program designs or delivery methods from school districts regarding servicing private school children. The USED guidance from 2019 notes options which could be provided directly by the public school district or by a third-party contractor.

The following instructional services can be provided on the premises of the private school, at the public school site, or in mobile classrooms:

- Instructional services provided by public school employees or third-party contractors;
- Expanded learning time, including before- and after-school programs;
- One-on-one tutoring;
- Summer school programs;
- Family literacy programs;
- Counseling programs;
- Mentoring programs;

- Computer-assisted instruction;
- Home tutoring;
- Instruction using take-home computers; and
- Any combination of the above.

In addition, teachers and families of participating private school students may participate, on an equitable basis, in services and activities provided by Title I funds (ESEA section 1117 (a)(1)(B) [2019 guidance \(C-15\)](#)).

Timely and Meaningful Consultation

ESSA requires that an LEA provide “timely and meaningful consultation” to eligible private schools that elect to receive services. This should occur between LEA officials that represent the Title I program and private school officials that will help with the consultation process. ESSA does contain new language that states both LEAs and private school officials “shall have the goal of reaching agreement on how to best provide equitable and effective programs to eligible private school children.”

Which Schools Must be Contacted?

- Every school year (generally in late winter/early spring), an LEA must contact officials from every private school serving students in one of its participating school attendance areas. A sample letter of notification to private schools and participation survey can be found in the [Title I, Part A Sample Documents](#) folder.
- This includes private schools located outside the LEA’s boundaries.

Consultation Topics

ESSA made substantial changes to the list of required topics that must be covered in a private school consultation. Under Section 1117(b)(1), LEA officials must consult with private school officials on the following topics:

1. How will the LEA identify private school children for services.
2. What services will be offered.
3. How, where and by whom will the services be provided.
4. How the services will be academically assessed and how the results of that assessment will be used to improve the Title I program.
5. The size and scope of the equitable services to be provided. Also, the proportion of funds that is allocated for these services and how that proportion of funds has been determined.
6. Whether a reasonable, necessary amount of funds will be reserved for administering equitable services under each program. If funds are reserved, the district must discuss why the reservation is reasonable and necessary and how they will be used. **Note, funds reserved for administering Title I, Part A equitable services must be taken from the amount calculated for such services. In other words, no**

public school funds could be used for the district’s administration of equitable services. The reservation would be taken out of the amount designated for equitable services.

7. The method and sources of data that will be used to determine the number of children from low-income families in participating school attendance areas who attend private schools, including whether data will be extrapolated if a survey is used.
8. How and when the LEA will make decisions about the service delivery mechanism that the LEA will use to provide equitable services. This discussion must allow for thorough consideration and analysis of private school officials’ view on the provision of services through a third-party provider.
9. How, if the LEA disagrees with the private school officials about the provision of services through a contractor, the LEA will provide the private school officials a written analysis of its reasons for the decision.
10. Whether the LEA will provide service directly, or through a separate government agency, consortium, entity or third-party contractor.
11. Whether to provide services to eligible private school children under a pool arrangement or to individual schools, based on the number of eligible children from each school.
12. When, including the approximate time of day, services will be provided.
13. Whether to consolidate and use Title I funds for equitable services with other ESSA programs.

Ideally, consultation with private school officials should begin in the spring (or earlier) prior to the school year for which services are planned and must occur on an ongoing basis throughout the year. See [Appendix F](#) for a suggested timeline. At a minimum, however, LEA officials must ensure:

1. Consultation takes place before any decisions are made affecting services to private school children; and
2. Services for private school students begin at the same time as services for public school students, presumably at the start of the school year.

NOTE: While an LEA must give full consideration to the views and perspectives of private school representatives, it is the LEA – not the private school – that is charged with making final decisions about the most effective way to raise the academic performance of participating students. ESSA does require in 1117(b)(2) that if, for some reason, after consultation the public school disagrees with the views of the private school on how to best serve the students, the LEA must provide an explanation of the decision in writing to the private school officials in a timely manner. (Regarding responsibility of the Title I program: [2019 Guidance C-12.](#))

Assessing the Program

- It is the LEA’s responsibility to evaluate services for effectiveness. Conversations about effectiveness should be part of the ongoing consultation process.
- Nothing in the ESSA or its regulations requires a private school, including a private school whose students receive services under Title I, Part A, to participate in a state's academic

assessment system.

- The district provides services to eligible private school students under Title I, Part A, the district must, through timely consultation with appropriate private school officials, determine how to assess academically the services to eligible private school students. [ESSA Section 1117(a)(1)(A), (b)(1)(D)].
- For more information on assessing your private school program please consult the [2019 Guidance](#) D-1 through D-3.

Ombudsman

ESSA sections 1117(a)(3)(B) and 8501(a)(3)(B) establishes the office of Ombudsman at KDE. The Ombudsman at KDE is the primary point of contact for addressing questions and concerns from private school officials and LEAs regarding the provision of equitable services under Title I and Title VIII. In addition, the KDE Ombudsman monitors and enforces the equitable services requirements and will have a significant role in the state monitoring process. For more information on the Ombudsman, see the [Non-Public School Ombudsman](#) webpage.

KDE Ombudsman Contact Information	
Email	kpsso@education.ky.gov

Signed Affirmations and the Equitable Services Consultation Form

After the initial consultation, the LEA must submit to the KDE Ombudsman:

- ESSA requires an LEA to maintain in its records, and provide to the SEA, a written affirmation that timely and meaningful consultation has occurred, and that all of the required consultation topics were covered.
- **Documentation:** Each LEA is expected to maintain in the agency's records, and provide to KDE, a written affirmation signed by the officials of each participating private school that meaningful consultation has occurred. The written affirmation must provide the option for private school officials to indicate their belief that timely and meaningful consultation has not occurred or that the program design is not equitable with respect to eligible school children. If the private school does not provide the affirmation in a reasonable period of time, the LEA should save all documentation that consultation has taken place, or evidence of the district's attempts to consult with the private school. [ESSA section 8501(c)].
- The [Equitable Services Consultation Form](#) is designed to be used when consulting with non-public schools about services provided through the following programs: Title I, Part A; Title I, Part C; Title II, Part A; Title III, Part A; Title IV, Part A; and Title IV, Part B. The forms contained in this form must be used during consultation meetings to guide the conversation between the district and the non-public school. The packet includes a needs assessment section for each program and a consultation agreement at the end of the document. **It is required that each district submit these forms for private schools receiving Title I, Part A services, via GMAP, to the KDE Ombudsman.**

- Once the initial consultation phase and the signed affirmation are completed, the LEA should continue frequent communications with private school teachers and officials to ensure adequate supervision of the program and evaluate its progress.

Other Roles of the KDE Ombudsman

- Serve as a general resource regarding equitable services requirements for both LEAs and private school officials, which may include conducting initial outreach to define the contours of the Ombudsman’s responsibilities.
- Develop, in partnership with other relevant SEA staff, monitoring protocols applicable to the provision of equitable services and participate in a sample of any monitoring activity.
- Provide technical assistance regarding equitable services requirements for SEA staff administering applicable programs, LEA staff and private school officials.
- Establish a process for receiving documentation of agreement from LEAs consistent with the consultation requirement that the results of such agreement shall be transmitted to the Ombudsman. [ESSA section 1117(b)(1)]
- Participate in the State’s Title I Committee of Practitioners [ESSA section 1603(b)] and, as applicable, nonpublic schools working group.
- The Ombudsman also should serve as the primary point of contact for responding to and resolving any complaints regarding equitable services that the SEA receives under its ESSA complaint procedures.

Further information about the processes and role of the KDE Ombudsman will be communicated directly from the Ombudsman office.

Other Information

For information on the following topics, please consult the [2019 Guidance](#):

- | | |
|---|--------------------------------|
| • Control of Title I funds, materials and equipment, C-26 | • Religious Symbols, C-23 |
| • Supplement vs. Supplant, C-14 | • Establishment Clause, C-22 |
| • Location of Services, C-21 | • Paraprofessionals, C-31 |
| | • Teacher Qualifications, C-30 |

Other Resources

The following non-public school resources are available in the [Title I, Part A Sample Documents](#) folder:

- Eligibility List for Title I
- End of Year Title I Survey for Private School Teachers
- Letter of Notification and Participation Survey
- Memorandum to Private Schools and Parent Surveys

PARAEDUCATORS

ESSA Section 1111(g)(2)(J) and (M)

The following material is meant to provide an overview of the authorizing statute and should be used in conjunction with the U.S. Department of Education (USED) [Non-Regulatory Guidance for Title I Paraprofessionals](#). Visit KDE's [Paraeducator Requirements in Title I Schools](#) webpage for more information regarding paraeducators in Kentucky.

For the purpose of Title I, Part A, a paraeducator (also called paraprofessional) is an employee of a local educational agency (LEA) who provides instructional support in a program supported with Title I, Part A funds. Paraeducators are vital team members in the delivery of instructional and other services to students. Because paraeducators provide instructional support, they should not be providing planned direct instruction or introducing new skills, concepts or academic content to students.

ESSA addresses educational qualifying factors for paraeducators. The qualifications for paraeducators under No Child Left Behind (NCLB) remain in place under ESSA. According to Section 1111(g)(2)(M), paraeducators must meet the same qualifications for state requirements "that were in place on the day before the date of enactment of ESSA." The qualifications for paraeducators are listed in [34 CFR 200.58](#). Specifically, all paraeducators working in a program supported with Title I, Part A funds must have a secondary school diploma or its recognized equivalent. The additional qualifying educational requirement for Title I, Part A funded paraeducators may be met by any one of the following:

- Complete two years of study at an institution of higher education; or
 - "Two years of study" means the equivalent of two years of full-time study as defined by the institution. For some institutions that may mean 12 credit hours per semester (requiring a total of 48 credit hours), while in others it may mean 15 credit hours a semester (requiring a total of 60 credit hours). While a paraeducator is not required to take a specific course of study, a paraeducator should be able to demonstrate knowledge of and the ability to assist in instructing in the areas of reading, writing and mathematics or in readiness.
 - A district may count continuing education credits (CECs) toward the two years of study if the CECs are part of an overall training and development program plan and an institution of higher education accepts or translates them to course credit.
- Obtain an associate's degree (or higher); or
- Meet a rigorous standard of quality and be able to demonstrate, through a formal state or local academic assessment, knowledge of the ability to assist in instructing reading/language arts, writing and mathematics (or as appropriate reading readiness, writing readiness and mathematics readiness). The purpose of the academic assessment is to demonstrate that paraeducators have the appropriate knowledge and ability to assist in instructing students and are competent in required instructional techniques and academic content areas. The revised 2nd edition October 2009 version of the Kentucky Paraeducator Assessment (KPA) is the state's formal academic assessment.

Individuals Required to Meet the ESSA Educational Requirement

1. Paraeducators with instructional duties in any program supported by Title I, Part A funds must meet the ESSA educational requirement. Individuals who have both instructional and non-instructional duties must meet the ESSA educational requirement because they carry out some instructional support duties.
 - a. For a Schoolwide Program (SWP), all paraeducators with instructional duties must meet the ESSA educational requirement without regard to whether the position is funded with federal, state or local funds. In a SWP, Title I funds support all teachers and paraeducators.
 - b. For a Targeted Assistance Program (TAS), only paraeducators with instructional duties who are paid with Title I, Part A funds must meet the ESSA educational requirement.
2. Paraeducators employed by the district to provide Title I, Part A instructional services to eligible private school students must meet the ESSA educational requirement.

For more information on paraeducator requirements, see the [Non-Regulatory Guidance for Title I Paraprofessionals](#) released by the U.S. Department of Education (USED) under the No Child Left Behind Act of 2001. This guidance is still effective unless otherwise stated by USED.

Allowable Duties for Paraeducators

Each LEA receiving assistance under this part shall ensure that a paraeducator working in a program supported with Title I, Part A funds is not assigned a duty inconsistent with this section.

Paraeducators providing instructional support in a program supported with Title I, Part A funds must work under the direct supervision of a teacher. The supervising teacher should plan and prepare lessons that the paraeducator will implement. For a SWP, all paraeducators with instructional duties must work under the direct supervision of a teacher. For a TAS, only paraeducators with instructional duties who are paid with Title I, Part A funds must work under the direct supervision of a teacher. Direct supervision of a teacher is considered to be:

1. The teacher prepares the lesson and plans the instructional support activities the paraeducator carries out and evaluates the achievement of the students with whom the paraeducator is working; and
2. The paraeducator works in close and frequent proximity with the teacher.

The following programs would be inconsistent with the requirement that paraeducators work in close and frequent proximity to a teacher:

- A program where a paraeducator provides instructional support and a teacher visits a site once or twice a week, but otherwise is not in the classroom.
- A program where a paraeducator works with a group of students in another location while the teacher provides instruction to the rest of the class.

Paraeducators who provide services to eligible private school students and are employed by the district must be under the direct supervision of a public school teacher throughout the duration of the services/program being offered.

Paraeducators hired by a third-party contractor to work in a Title I program must work under the direct supervision of a teacher. That teacher does not have to meet the teacher qualification requirement if the third-party contractor employs the teacher.

Because paraeducators provide instructional support, they should not be creating lessons for whole group instruction or introducing new skills, concepts or academic content to the whole class. Paraeducators working in a program supported with Title I, Part A funds may provide the following services, under the direct supervision of teachers or other licensed personnel:

1. Provide one-on-one tutoring for eligible students, if the tutoring is scheduled at a time when a student would not otherwise receive instruction from a teacher;
2. Assist with classroom management such as organizing instructional materials;
3. Provide instructional assistance in a computer laboratory;
4. Conduct parent and family engagement activities;
5. Provide instructional support in a library or media center;
6. Act as a translator; or
7. Provide instructional services to students under the direct supervision of a teacher.

Funding Professional Development

Several federal programs provide funds that local school districts may use to provide professional development for paraeducators:

1. **Title I, Part A** funds may be used to support ongoing training and PD to assist teachers and paraeducators working in a program supported with Title I, Part A funds. Title I, Part A funds also may be used for PD to help paraeducators become certified and licensed teachers.
2. **Title II, Part A** (Teacher Quality Program) funds may be used to provide PD activities that improve the knowledge of teachers and principals and, in appropriate cases, paraeducators concerning effective instructional strategies, methods and skills and use of challenging content standards to improve teaching practices and student academic achievement. Title II-A funds also may be used for PD to help paraeducators become certified and licensed teachers.
3. **Title III, Part A** (English Language Acquisition) funds may be used to provide PD for teachers and other instructional personnel providing instruction to students who need English language acquisition and language enhancement.
4. **Title V** funds may be used to provide PD for teachers and other instructional personnel providing instruction to students of the district.

PRESCHOOL AND TITLE I

ESSA Sections 1112, 1114 and 1115

Preschool can play a major role in providing high-quality early learning experiences to young children. Supporting children's growth, development, and learning in the early years, particularly for children who face significant challenges to successful learning, is an important strategy for ensuring children enter kindergarten ready to learn and succeed.

According to the [Serving Preschool Students Under Title I Non-Regulatory Guidance](#), for the purposes of Title I, a preschool program is a program of educational services for eligible children below the age at which the local educational agency (LEA) provides elementary education and is focused on raising the academic achievement of children once they reach school age. [34 CFR 77.1](#) defines preschool as the educational level from a child's birth to the time at which the state provides elementary education. The following material is meant to provide an overview of the authorizing statute and should be used in conjunction with the U.S. Department of Education (USED) [Non-Regulatory Guidance for Expanding Opportunities to Support our Youngest Learners](#).

Note: Preschool students may not be counted in enrollment and low-income numbers for Title I, Part A ranking and serving purposes. Only students in grades K-12 between the ages of 5 to 17 can be counted for enrollment and low-income numbers in the Title I GMAP application, which would not include preschool students (ESSA 1113(a)(5)(A)).

Visit KDE's [Preschool/Primary](#) webpage for more information on preschool programs in Kentucky.

Funding Preschool Programs

A district may reserve funds to operate Title I preschool programs. Those funds may be distributed to other comparable public early childhood education programs (such as Head Start and other early childhood education programs) to operate Title I preschool programs. Public schools receiving Title I funds may use the school's allocation to operate a Title I preschool program. Title I funds may be used to provide services directly to eligible preschool children, help with the transition to kindergarten and supplement or extend the existing preschool program. Outside providers can be subcontracted using Title I funds.

A district or school is not required to serve preschool students with Title I funds. The district may reserve funds in the district set-asides to serve eligible preschool students in the district as a whole or for a portion of the district, or a participating school may use its Title I funds to serve eligible preschool students. If a district opts to use Title I funding for early learning, a strategy must be developed and described in their Title I plan. This description should include how the district will support, coordinate and integrate Title I services with early childhood education programs at the district or school level. The plan also should include details on transitioning children from early childhood education to elementary school.

A Title I district or school may use Title I funds to support a district-operated preschool program or a school-operated preschool program. Title I funds may be used in coordination with other preschool programs, too, based on the needs of its eligible students and the most effective way to use the funds. Specifics on using Title I funds for early childhood education can be found in the Non-Regulatory Guidance. The requirements

for a targeted assistance school and a schoolwide program apply to services for preschool students.

Kentucky's preschool education programs are available for automatically eligible children (detailed under Eligible Students) as well as all 4-year-old children whose family income does not exceed 160 percent of the federal poverty level, all 3- and 4-year-old children with disabilities meeting criteria for special education services, regardless of income, and other 4-year-old children as placements are available. Title I preschool programs cannot replace those services. Title I preschool programs must supplement the Kentucky preschool programs as Title I funds cannot be used to fund preschools required by state law or local school board policy. Title I funds may be used to expand the existing required preschool programs.

Before Title I funds can be spent on a preschool, the LEA must first meet state requirements using non-federal dollars. Information on Kentucky's requirements can be found on the [Preschool/Primary](#) webpages. Information on teacher certification is available from the [Kentucky Education Professional Standards Board](#).

Standards for Preschool Programs

A district using Title I funds to provide preschool programs to low-income children not served by state-funded preschool must ensure those services comply at a minimum with the achievement standards established under section [641A\(a\) of the Head Start Act](#). The specific Head Start standards applicable to Title I preschool programs are in regulations at [45 CFR 1302](#).

[The Kentucky Early Childhood Standards](#) document was designed to reflect the range of developmental abilities typical of young children, birth to 5 years of age. Although the Kentucky Department of Education does not require public preschools to design their programs around these standards, districts will want to reference the information as preschool programs are being developed.

If an LEA offers a public preschool education, it must meet all of the ESSA foster care requirements, including ensuring a child in foster care remains in his/her preschool of origin, unless a determination is made that it is not in the child's best interest. The program also must meet, at a minimum, the education performance standards of the [Head Start Program Performance Standards](#) that are aligned with the [Head Start Child Early Learning Outcomes Framework Ages Birth to Five](#).

Eligible Students

When a Title I preschool is funded at the district level, criteria must be established to identify the children who are most at risk of failing to meet Kentucky's student academic achievement standards. The district must include multiple educationally related, objective criteria, such as developmentally appropriate measures of child development.

A preschool that is part of a school operating a Title I Schoolwide Program (SWP) is not required to identify children as eligible to participate in the Title I preschool. All children in the attendance area of the school are eligible for preschool services.

A preschool that is part of a school operating a Title I Targeted Assistance Program (TAS) may serve preschool-age children who are failing or most at risk of failing to meet Kentucky's student academic achievement standards as determined by multiple, educationally related, objective criteria established by

the district and supplemented by the school. Family income may be used to determine eligibility for a Title I preschool, particularly for the purpose of prioritizing when Title I resources to serve all preschool-age children with other educational needs are insufficient. Children should not be identified for Title I preschool based solely on family income.

Some children are “automatically eligible” to participate in a Title I preschool program. Children who participated in a Head Start or a Title I preschool program at any time during the two preceding years, homeless preschool-age children, migrant education preschool-age children (Title I, Part C) and children in a local institution or attending a community day program for neglected or delinquent children and youth are automatically eligible for Title I preschool and to continue into Title I school programs.

Parent and Family Engagement

All children need support from parents, families, schools and communities to be successful. Quality family environments and positive interactions with parents, family members and caregivers are essential to a young child’s development and wellbeing. Children demonstrate higher academic performance, earn higher grades and have improved postsecondary outcomes when school districts implement research-based family engagement activities. Parent and family engagement should begin from birth and continue when children start school. State-funded preschool programs are required to offer parent education and training, as well as develop two-way communication systems with parents. Preschool programs have a critical role to play assisting parents with understanding child development and what children need during each developmental stage. All provisions of parent and family engagement that are required for Title I programs (both SWP and TAS) in Section 1116 also are requirements of a Title I-funded preschool except ESSA 1116(d)(2)(A), the discussion of school-family compacts at parent-teacher conferences in elementary schools.

Transition from Preschool to Kindergarten

When a Title I preschool is funded at the district level, responsibilities must be established to assist children transitioning from preschool to elementary school programs. In its local Title I plan, a district must include how it will coordinate and collaborate with other programs such as Head Start, state-funded preschool, childcare and special education.

A preschool that is part of a school operating a Title I SWP must assist children transitioning from early learning programs, such as Title I preschool, Head Start, state-funded preschool, childcare, special education and other preschool programs, to kindergarten. The school must include a description of how it will assist preschool children in this transition in its comprehensive SWP.

A preschool that is part of a school operating a Title I TAS must coordinate and collaborate with the school’s regular education program, which may include services to assist preschool children transitioning from early learning programs, such as Title I preschool, Head Start, state-funded preschool, child care, special education and other preschool programs, to kindergarten.

Title I Preschool

Before Title I funds can be spent on a preschool, the LEA must first meet state requirements using non-

federal dollars. Information on Kentucky’s requirements can be found on the [Preschool/Primary](#) webpages.

ESSA Reference	Summary of Requirements
<p>ESSA 1114(a)(1) ESSA 1114(a)(3) ESSA 1114(b)(7)(A) ESSA 1114(b) ESSA 1114(c) ESSA 1115(b)(2)(C)</p>	<p>Schoolwide Program (SWP): Preschool students in a school that is served with a SWP Title I program are eligible to be included in the enrollment and served as part of the SWP.</p> <p>Targeted Assistance (TAS): If a school is served by Title I funds (SWP or TAS), they may serve preschool students within their attendance zone using a targeted assistance program for preschool students identified as “at risk of failing to meet state standards.”</p>
<p>ESSA 1111(a)(1)(B) ESSA 1114(a)(1) ESSA 1114(a)(3) ESSA 1119(a) ESSA 1119(b) ED Guidance page 10</p>	<p>District (LEA)-Operated: An LEA may reserve a portion of funds from its Title I allocation to operate a preschool program for eligible children in the LEA as a whole or in a portion of the LEA.</p> <ul style="list-style-type: none"> • <u>District (LEA) as a Whole:</u> An LEA may serve preschool children who reside throughout the LEA and whom the LEA identifies as eligible because they are at risk of failing to meet the state’s academic achievement standards when they reach school age. An LEA may not use Title I funds to implement a preschool program throughout the district to benefit all preschool students in the LEA unless all the schools in the LEA are Title I schools operating schoolwide programs. • <u>Portion of the District (LEA):</u> An LEA may serve preschool children who reside in specific Title I school attendance areas (e.g., its highest-poverty school attendance areas) served by some or all of its Title I schools if, for example, an LEA does not have sufficient Title I funds to operate a preschool program for the district as a whole.
<p>ESSA 1114(a)(1) ESSA 1114(a)(3) ESSA 1112(c)(7) ESSA 1119(a) ESSA 1119(b) ED Guidance page 10</p>	<p>Coordination with Other Early Childhood Programs: An LEA or school may use Title I funds to improve the quality or extend the day or number of days of state preschool, Head Start, childcare or other community-based early learning programs for eligible children. Title I funds may be used to provide preschool services for Title I eligible children who:</p> <ul style="list-style-type: none"> • Are not eligible for Head Start services based on income requirements; • Are eligible for Head Start but not served in a Head Start center due to unmet need; • Are enrolled in a state preschool, Head Start, childcare or community-based early learning program and are in need of additional services (e.g., extending the day, increasing number of days); or • Would benefit from home visiting because they are most at risk of failing to

ESSA Reference	Summary of Requirements
	meet the state’s challenging academic standards.
ED Guidance pages 7-11 and 22-24	<p>In addition to providing direct preschool services, Title I funds may also be used to support early learning in other ways:</p> <ul style="list-style-type: none"> • Professional development for early childhood staff in Title I Preschool • Minor repairs or remodeling to accommodate preschool program • Health, nutrition and other comprehensive services for children in a Title I preschool • Professional Development for teachers in non-Title I preschools, if the children in the program are likely to attend a Title I school in Kindergarten. The preschool program must be coordinated with the Title I school it feeds.

TITLE I AND CHILDREN IN FOSTER CARE

ESSA, Title I Part A, Sections 1111 & 1112

The Elementary and Secondary Education Act (ESEA) as amended by the Every Student Succeeds Act (ESSA) emphasizes the educational stability of vulnerable students, including those in foster care. Children in foster care face many educational barriers, including traumatization, high mobility and undiagnosed behavioral and health conditions. The following material is meant to provide an overview of the authorizing statute and should be used in conjunction with the [Non-Regulatory Guidance for Ensuring Educational Stability for Children in Foster Care](#), developed by the U.S. Department of Education (USED) and U.S. Department of Health and Human Services.

ESSA section 1111(g)(1)(E) provides new guidelines for ensuring the educational stability of children in foster care. Title I Part A of ESSA requires local education agencies (LEAs) receiving Title I funds to collaborate with state or local child welfare agencies on local procedures for transportation for students in foster care. This must be accomplished by ensuring that transportation for children in foster care is provided, arranged and funded [ESSA 1112(c)(5)(B)]. An LEA must ensure that transportation provided for children in foster care is consistent with the procedures developed by the LEA in collaboration with the state or local child welfare agency under section 1112(c)(5)(B) of ESSA. These requirements apply whether or not the LEA already provides transportation of children who are not in foster care. The [Transportation Guidelines and Procedures to Ensure Educational Stability for Children and Youth in Foster Care](#) can help districts and local child welfare agencies work together to develop transportation procedures for students in foster care.

An LEA in collaboration with local child welfare agency (LCWA) must ensure that children in foster care needing transportation to the school of origin promptly receive such transportation in a cost-effective manner [ESSA 1112(c)(5)(B)(i)]. Therefore, the LEA and the LCWA must provide or arrange for adequate and appropriate transportation to and from the school of origin while any disputes are being resolved.

Definitions

Foster care: 24 -hour substitute care for children placed away from their parents or guardians and for whom the child welfare agency has placement and responsibility (e.g., placements in foster family homes, foster homes of relatives, group homes, emergency shelters, residential facilities, child care institutions and pre-adoptive homes.)

Educational stability: The maintenance of the enrollment of a child in a particular school upon a transition to a different placement of living arrangement when such maintenance is in the best interest of the child.

School of origin: The public school in which the child was enrolled immediately prior to placement.

Best interest of the child: Determination regarding the enrollment of the child made when considering all factors relating to the best interest of the child, including, but not limited to:

- The benefits to the child of maintaining educational stability;
- The appropriateness of the current educational setting;
- The child's attachment and meaningful relationships with staff and peers at the current educational setting;

- The influence of the school’s climate on the child;
- The safety of the child; and
- The proximity of the placement of the school of origin and how the length of the commute would impact the child.

Role and Responsibility of a Local Educational Agency (LEA) Foster Care Point of Contact

Individuals identified as the [LEA foster care point of contact](#) (POC) should have the capacity (time, access to school resources) to adequately fulfill the anticipated roles and responsibilities to ensure educational stability, best interest and school success of students in foster care.

- Serve as the LEA foster care point of contact to promote educational stability for students in foster care, including supporting best practices for local policies and procedures that remove barriers to education for youth in foster care.
- Coordinate regularly with the local child welfare agency (LCWA) to implement ESSA’s Title I, Part A provisions, which includes collaboration, participation in school placement best interest determinations (BID), provision of transportation, and facilitation of immediate enrollment and records transfers.
- Ensure school district representation in the best interest determination (BID) process for youth in foster care within an appropriate timeframe.
- Ensure that foster care student transfer records are requested and transferred in accordance with [KRS 199.802](#), when changing schools.
- Ensure the LCWA receives current educational information on the [Educational Passport](#) for a student to promote educational stability.
- Understand local transportation plan procedures and assist in coordinating local transportation procedures for youth in foster care to remain in the school of origin (SOO) and ensure the identified transportation options are implemented.
- Ensure that youth in foster care are enrolled, aware of school services and resources and are regularly attending school.
- Assist in resolving disputes, as needed, including ensuring that disputes among agencies do not interrupt the educational stability of youth in foster care.
- Serve as a resource to school and district staff, parents, foster parents and other providers to ensure educational stability policies and procedures are followed and documented.
- Connect youth in foster care requiring special education services to appropriate district staff to ensure equitable access to appropriate services, in addition to meeting compliance with relevant special education laws such as the individuals with Disabilities Education Act (IDEA) and Section 504.
- Demonstrate knowledge of the federal [Fostering Connections to Success and Increasing Adoptions Act](#) of 2008 and the Uninterrupted Scholars Act of 2013 as it relates to ensuring educational stability for youth in foster care.

For more information and resources on the education of children in foster care, visit KDE’s [Foster Care](#) webpage.

EDUCATION OF HOMELESS CHILDREN AND YOUTH

Title IX, Part A reauthorized under ESSA

The McKinney-Vento Homeless Assistance Act was the first and remains the only major federal legislative response to homelessness. The McKinney-Vento Act applies to children and youth age 21 and under, consistent with their eligibility for public education services under state and federal law.

This technical assistance document is intended to provide an overview of the authorizing statute and should be used in conjunction with the U.S. Department of Education (ED) [Non-Regulatory Guidance for the Education for Homeless Children and Youth Program](#). For more information on the education of homeless children and youth in Kentucky, visit KDE's [Title IX, Part A – Education for Homeless Children and Youth](#) webpage.

Purpose of Homeless Education

Homeless children and youth are to be provided services comparable to those received by other students. The services include transportation services and education programs for which students meet eligibility criteria. These school services may include those provided under Title I or similar state or local programs; access to Early Head Start, Head Start and preschool programs; programs for students with disabilities; programs for students with limited English proficiency; vocational or technical programs; gifted and talented programs; school nutrition programs; and transportation.

The mission of the Kentucky Department of Education's Homeless Education Program is to be a supporter and nurturer of children and youth experiencing homelessness; to help them achieve educational success by ensuring that they have meaningful participation with positive outcomes.

McKinney-Vento Grant

The Homeless Education Program includes competitive grants. The McKinney-Vento Grant is a competitive grant that is awarded on a three-year cycle. The most recent cycle began in July 2021. A list of [McKinney-Vento Homeless Assistance Act Grant Recipients](#) is maintained on the KDE webpage. Funding amounts will vary dependent upon the state award and the district's application.

Any district which applies for a McKinney-Vento grant should create an application that outlines how they will use funds to implement a homeless education program which addresses needs identified through a comprehensive needs assessment and is education focused. Budgets should be developed based on the program design and should accurately reflect amounts needed to effectively implement it. The average award for this grant is approximately \$65,000. Districts may or may not receive the total amount requested. Each application is scored based on program design and homeless count. The applications with the highest scores receive awards based on availability of funds. The next Request for Applications (RFA) from local education agencies will take place during the 2023-24 school year. Contact the homeless program state coordinator for additional information about the McKinney-Vento Grant.

Definitions

Enroll and Enrollment: Attending classes and participating fully in school activities.

Unaccompanied Homeless Youth: A youth not in the physical custody of a parent or guardian and experiencing homelessness. The National Center for Homeless Education's [unaccompanied youth eligibility flowchart](#) can provide guidance on determining status as an unaccompanied homeless student.

School of Origin: The school the child or youth attended when permanently housed, or the school in which the child or youth was last enrolled; including preschools or feeder schools.

Dispute Resolution: A process or procedure for parents or unaccompanied youth to use to resolve problems involving educational placement of homeless children/youth.

Records: Any information or documentation ordinarily kept by the school such as immunization, medical records, birth certificates, guardianship papers, academic records and evaluations for special services or programs.

Placement Choice: Decision for placement is made regardless of whether the child is living with the homeless parents or has been temporarily placed elsewhere.

Homeless children or youth are defined as individuals who lack a fixed, regular, and adequate nighttime residence. The term includes:

1. Children and youth who are:
 - a. Sharing the housing of other persons due to loss of housing, economic hardship, or a similar reason (sometimes referred to as doubled-up);
 - b. Living in motels, hotels, (camping) trailer parks, or camping grounds due to lack of alternative adequate accommodations;
 - c. Living in emergency or transitional shelters;
 - d. Abandoned in hospitals; or
2. Children and youth who have a primary nighttime residence that is a public or private place not designed for, or ordinarily used as, a regular sleeping accommodation for human beings;
3. Children and youth who are living in cars, parks, public spaces, abandoned buildings, substandard housing, bus or train stations, or similar settings; and
4. Migratory children or youth who qualify as homeless because they are living in circumstances described above.

Identifying Homeless Preschoolers

Local liaisons can identify preschool-aged homeless children by working closely with shelters and social service agencies in their area. In addition, the liaison should work with school personnel who can inquire at the time they are enrolling homeless children and youth in school whether the family has preschool-aged children. The district liaison should also collaborate with the school district special education program. The Individual with Disabilities Education Act (IDEA) requires that highly mobile children with disabilities, such as

migrant and homeless children who are in need of special education and related services, are located, identified and evaluated. Additionally, IDEA requires that homeless preschoolers and all children be included in the “Child Find” process for early identification of special education needs.

The district liaison should work with preschool program staff to remind them how important their services are for homeless children and to inform them of how waiting lists often create barriers for homeless families who wish to enroll their children. Some preschool programs keep slots open specifically for homeless children.

District Requirements

Set-Aside Funds

1. The district must meet all federal requirements regardless of whether they receive McKinney-Vento Grant monies or not. The district must set-aside monies in the homeless set-aside in the Title I Application in GMAP for homeless students and describe the educational services for these students. Funds must be set aside even if no students in the district are currently identified as experiencing homelessness, in the event that homeless students are identified during the school year. The services to homeless students in non-Title I schools must be equitable to services provided to Title I students attending Title I schools.
2. The district’s Title I, Part A application should also include a description of the method used for determining the amount reserved, whether by a needs assessment or some other method (e.g., past homeless student enrollment and support service cost data), and how the liaison was consulted or involved in determining the set-aside. There is not currently a formula for determining the appropriate amount for the homeless set-aside, but four commonly accepted methods are:
 - a. **Conduct a needs assessment in conjunction with local social services or shelters.** The homeless liaison can work with local homeless assistance agencies, shelters, etc. to determine the services homeless children need and the appropriate amount to pay for them.
 - b. **Obtain a count of homeless students and multiply the number by the LEA’s Title I, Part A per-pupil allocation.** If surveying the school staff, it is crucial to ensure that staff understand the law’s definition of homeless as well as prohibitions on segregating or stigmatizing homeless students.
 - c. **Match or exceed the district’s McKinney-Vento subgrant.**
 - d. **Use a percentage based on district poverty level.** If using this method, the district is recommended to examine comparison data (such as student mobility rates) in order to better estimate the appropriate percentage.

The National Center for Homeless Education’s [Determining Title I Set Aside](#) document may provide additional guidance on the subject.

3. A district receiving a McKinney-Vento Grant must set-aside Title I, Part A funds. In addition to the

homeless set aside, **grant districts must set aside additional funds in the McKinney-Vento set aside**. The amount must match the amount of funds the district agreed to in their grant proposal.

Homeless Liaison

1. The district must designate an appropriate staff person to serve as the liaison for homeless children and youth. The liaison may have other duties that include but are not limited to coordinating other federal programs.
2. The district must ensure that homeless children and youth are identified by school personnel and through other entities and agencies.
3. The district is to inform parents or guardians of educational and related opportunities available to their children and must provide them with meaningful opportunities to participate in the education of their children.

Dispute Resolution

1. The district must mediate all enrollment disputes in accordance with the enrollment disputes provision.
2. Before a dispute occurs, make sure the district-level dispute process is streamlined and accessible to homeless parents, guardians, and unaccompanied youth. The district should have written procedures to ensure that all staff members involved know their responsibilities and ensure barriers to initiating the dispute process are eliminated.
3. The child or youth “shall be immediately enrolled in the school in which enrollment is sought, pending final resolution of the dispute including all available appeals” [42 U.S.C. § 11432(g)(3)(E)(i)].
4. In the case of an unaccompanied youth, the local liaison also must ensure that the youth is immediately enrolled in the school in which the youth seeks enrollment pending the resolution of the dispute [42 U.S.C. § 11432(g)(3)(E)(iv)].
5. While disputes are pending, students have the right to participate fully in school and receive all services that they would normally receive, as the definition of enrollment includes “attending classes and participating fully in school activities” [42 U.S.C. § 11434a(1)].
6. The district must assist unaccompanied youth in placement/enrollment decisions, consider the youth's wishes in these decisions, and inform the youth of the right to appeal such decisions under the enrollment disputes provision.

Records

1. The district must assist children and youth in obtaining necessary immunizations or medical records.
2. The district must collaborate and coordinate with state coordinators, community and school personnel, who are responsible for the provision of education and related services to homeless children and youth.
3. The district must ensure that the school selected for attendance immediately enrolls the child/youth in school, even if he or she lacks records normally required for enrollment. Such records include the previous academic records, medical records, proof of residency, or other documentation.

4. The district must immediately contact the last school attended to obtain relevant academic and other records.
5. The district must keep records normally kept by the school. These records include immunization or medical records, academic records, birth certificates, guardianship records, and evaluations for special services or programs. These records must be available in a timely fashion, when a child/youth enters a new school district and, in a manner, consistent with the Family Educational Rights and Privacy Act of 1974.

Transportation

1. The district must fully inform the parent/guardian of a homeless child/youth or any unaccompanied youth of all transportation services available, including transportation to the school of origin.
2. At the request of the parent/guardian, the district must ensure that transportation is provided to and from the school of origin. In the case of an unaccompanied youth, the liaison may request this service.
3. If the homeless student moves to another school district but continues to attend the school of origin, both districts must decide which district is responsible for transportation costs to the school of origin. If the districts cannot agree, they must share costs and responsibilities equally.

Professional Development

1. The district may use funds for professional development to heighten awareness of the plight of homeless children for his/herself and school employees.

Nutrition

1. Under the school nutrition program homeless children are automatically eligible for free meals.

TITLE I AND HOMELESS CHILDREN AND YOUTH

ESSA, Title I, Part A, Sections 1114, 1115, 1118

Homeless children and youth are to be provided services comparable to those received by other students. The Stewart B. McKinney-Vento Homeless Assistance Act was the first, and remains the only, federal legislative response to homelessness. The mission of KDE's Homeless Education Program is to be a supporter and nurturer of homeless children and youth; to help them achieve educational success; and to prepare them for the challenges of adult life. The following material is meant to provide an overview of the authorizing statute and should be used in conjunction with the U.S. Department of Education (USED) [Policy Guidance for Education for Homeless Children and Youth Program](#).

Key Provisions in Title I, Part A, Relating to Homelessness

- Removes "awaiting foster care placement" from the definition of homeless as of December 10, 2016.
- Expands the definition of "school of origin" to include preschool and feeder schools.

- Requires continued enrollment and transportation during any enrollment dispute pending final resolution of the dispute, including all available appeals.
- Expands transportation to the school of origin through the remainder of the school year in which the student becomes permanently housed.
- Requires that all State educational agencies (SEAs) and local educational agencies (LEAs) have policies to remove barriers to identification, enrollment and retention of children and youth who are homeless, including barriers to enrollment and retention due to outstanding fees, fines or absences.
- Requires SEAs to have procedures that ensure that students who are homeless and who meet the relevant eligibility criteria do not face barriers to accessing academic and extracurricular activities, including magnet schools, summer school, career and technical education, advanced placement courses, online learning and charter schools.
- Requires the State Plan describe how youth who are homeless will receive assistance from counselors to advise such youth and improve their readiness for college.
- Requires that the State Plan ensure appropriate access to secondary education including procedures to remove barriers that prevent youth from receiving appropriate credit for full or partial coursework completed while attending a prior school.
- Requires LEAs to immediately enroll children and youth who are homeless even if they have missed application and enrollment deadlines during any period of homeless.
- Allows LEA liaisons to refer students and their families to needed housing services and to affirm eligibility for students and their families for homeless assistance programs funded by the United States Department of Housing and Urban Development if the liaison has received training.
- Requires that information about a homeless child's living situation (e.g., homeless status, temporary address) be treated as a student education record and not be deemed to be directory information.
- It targets those students most at risk of failing in school.
- A homeless child/youth attending any school in the district is eligible for Title I services.
- Districts must set-aside funds to provide comparable services to children experiencing homelessness, including providing educationally related support services to children in shelters and other locations where children may live.
- Each district Title I coordinator must include a description and set aside adequate funding on the Title I Application in GMAP of the services that will be provided to homeless children at Title I and non-Title I schools.
- Children/youth who are in homeless situations benefit from Title I services and programs. However, additional Title I funds may be needed to address specific needs of children who are homeless or highly mobile. For example, an excellent reading program implemented in a schoolwide or targeted assistance school will not be effective for children/youth that are unable to attend school regularly. An appropriate expenditure of Title I funds would be to remove barriers that prevent regular attendance or provide additional support, such as tutoring, before and after school and/or summer school

programs. Funds other than those set-aside by Title I, Part A, must be used to provide transportation to school of origin.

- District homeless liaisons are required to be appointed in every school district, and district Title I coordinators must communicate and collaborate on an ongoing basis with the liaison to identify the needs of homeless children/youth, review resources, and plan ways to address needs.

Expanded Availability and Use of Title I, Part A Funds

Expanding the availability and use of Title I, Part A funds increases the resources for homeless students.

- The amount of Title I funds reserved for homeless children and youth may be determined based on a needs assessment and must be based on the total allocation received by the LEA and reserved prior to any allowable expenditure transfers by the LEA.
- Title I funds reserved for homeless children and youth may be used for services not ordinarily provided by Title I.
- Title I funds may be used for local liaisons and transportation to a student's school of origin.

Strategies for Serving Homeless Children and Youth and Title I, Part A

Two principles govern the use of Title I, Part A funds to provide services to homeless students:

1. The services must be reasonable and necessary (as outlined in [2 CFR 200.403\(a\)](#)) to assist homeless students to take advantage of educational opportunities.
2. Title I, Part A funds must be used only as a last resort when funds or services are not available from other public or private sources, such as the USDA's National School Lunch Program and Breakfast Program, public health clinics or local discretionary funds (sometimes provided by the PTA) used to provide similar services for economically disadvantaged students generally.

The [National Center for Homeless Education](#) at SERVE provided the following strategies for using Title I, Part A, funds for students experiencing homelessness. These strategies are suggestions that may be helpful in addressing the needs of homeless students and are taken from an NCHHE brief entitled [Serving Students Experiencing Homelessness Under Title I, Part A](#).

- Establish a formula to allocate Title I set asides for homeless children/youth.
- Use Title I funds (including set-aside funds) to support the position of a full-time district homeless liaison so the liaison's duties can be more fully accomplished.
- Use Title I funds to meet basic needs of students experiencing homelessness (clothing, supplies, health) so that they may participate more fully in school. The LEA may use Title I, Part A funds to provide, where appropriate, items or services including, but not limited to –
 - Items of clothing, particularly if necessary to meet a school's dress or uniform requirement;
 - Clothing and shoes necessary to participate in physical education classes;
 - Personal school supplies such as backpacks and notebooks;

- Birth certificates necessary to enroll in school;
 - Immunizations;
 - Food;
 - Medical and dental services;
 - Eyeglasses and hearing aids;
 - Counseling services to address anxiety related to homelessness that is impeding learning;
 - Fees for college entrance exams such as SAT or ACT; and
 - GED testing for school-age students.
- Use Title I funds for parent and family engagement that makes a special effort to reach out to parents in homeless situations.
 - Extended learning time (before and after school, Saturday classes, summer school) to compensate for lack of quiet time for homework in shelters or other overcrowded living conditions.
 - Tutoring services, especially in shelters or other locations where homeless students live.
 - Use set-aside funds for outreach services to children/youth living in shelters, transitional living programs, motels and other temporary residences.
 - Use Title I funds for evidence-based programs that benefit highly mobile students.
 - Collect data on students experiencing homelessness as part of the overall district-wide data collection system.
 - Coordinate Title I and McKinney-Vento grant funds to provide a comprehensive program for children at risk of failure, ensuring that specific needs of children experiencing homelessness or high mobility are met.

Collaboration and Coordination between Title I, Part A, and Homeless Education

Each year, the Title I coordinator and local homeless liaison should work together to determine an appropriate amount for funds to be reserved for homeless students. The two individuals should review data on homeless students in the school district to address the following questions:

- How many homeless students were enrolled in our schools during the past year?
- How many of these students attended non-Title I schools?
- What are the greatest unmet educational needs of homeless children and youth in the district?

Once these questions are answered, the coordinator and homeless liaison should identify activities to meet the needs and determine the amount for the Title I homeless set-aside, keeping in mind that activities should supplement and not supplant those that are required by the school district. Ways to determine set-aside amounts:

- Base amounts on an annual needs assessment for homeless students.
- Multiply the number of homeless students by the Title I-A per pupil allocation.

- For districts with sub-grants, reserve an amount equal to or greater than the McKinney Vento funding request.

Reserve a percentage based on the district's poverty level or Title IA allocation. Meetings between the Title I coordinator and homeless liaison should occur throughout the school year, so that the homeless set-aside funds can be spent appropriately. The Title I coordinator and homeless liaison should be very familiar with each other's program.

Strategies to facilitate collaboration and coordination between Title I, Part A and Homeless Education include the following. These strategies are suggestions that may be helpful in addressing the needs of homeless students.

- Ensure that district homeless liaisons attend Title I conferences and professional development and that Title I coordinators attend homeless education conferences and in-service.
- Share Title I and Homeless Education handbooks with each program.
- Collect and share across the district concrete data on the needs of homeless children/youth.
- Involve Title I coordinators in structured coalition-building with homeless education programs and organizations that serve homeless families and unaccompanied homeless youth and establish common goals.
- Initiate district efforts to make accommodations for homeless children/youth as necessary in such areas as transportation, remaining in the school of origin, records transfer, class scheduling and special services that will help them enroll, attend and succeed in school.
- Involve homeless education program staff in school improvement issues and make sure that addressing the needs of highly mobile students is included in the Comprehensive School Improvement Plans, not addressed as a separate issue.
- Emphasize that coordination and sharing of resources is beneficial to the district as a whole because serving homeless children/youth will increase school achievement, lower truancy and dropout rates and increase overall funding to the district.
- Determine what funding is available to serve homeless children/youth and how it is being used. Identify needs and develop a cross-program approach to address unmet needs.
- Establish and widely disseminate information on district-wide policies, procedures and guidelines to identify and serve homeless children/youth.
- Ensure district homeless liaison representation on the appropriate district planning committee.
- Include homeless parents in Title I parent and family engagement policies and create opportunities for homeless parents to be involved.

Websites Addressing Homelessness

The following websites contain resources that may be useful to districts and schools in developing and implementing plans to address homelessness:

[KDE Title IX, Part A – Education for Homeless Children and Youth](#)

This site provides specifics regarding the education of children and youth experiencing homelessness in the state of Kentucky.

[National Center for Homeless Education \(NCHE\)](#)

Funded by the U.S. Department of Education, NCHE operates the Department's technical assistance center for the federal [Education for Homeless Children and Youth](#) (EHCY) Program. NCHE works with schools, service providers, parents and other interested stakeholders to ensure that children and youth experiencing homelessness can enroll and succeed in school.

[Technical Assistance Collaborative](#)

This site provides information on a full range of federal and mainstream housing programs and policies. These programs expand on affordable housing for people with disabilities and who may be homeless. The site also features a newsletter and links to other sites.

[U.S. Interagency Council on Homelessness](#)

This site contains state and local information on mainstream resources available to assist people who are homeless. News and updates, a library of resources, a phone list of clearinghouses, and links to member organizations and other helpful sites are also available.

LOCAL INSTITUTIONS FOR NEGLECTED & DELINQUENT CHILDREN

ESSA Title I, Part A, Section 1113

A district must provide for the educational needs of children in identified local institutions for neglected children. The following material is meant to provide an overview of the authorizing statute and should be used in conjunction with the US Department of Education (USED) [Non-Regulatory -Guidance for Neglected, Delinquent, or At-Risk Children](#). Visit KDE's [Title I, Part D](#) webpage for more information on services for neglected and delinquent children, as well as a [list of facilities for neglected children](#) in Kentucky.

Definition

Children who reside in a local institution for neglected children are counted as eligible for the Title I, Part A allocation. The Cabinet for Families and Children identifies the institutions and their numbers of formula children based on a child count taken in October. The children in these institutions must receive Title I educational services based on consultation with the institution and a needs assessment. Any local institution for neglected children not included in the count also may be served at the discretion of the district. A local institution for neglected children is not considered a private school.

Funding Institutions for Neglected and Delinquent Children

The amount of funds generated by children in local institutions for neglected children is a part of the Title I, Part A allocation. Before allocating funds to public schools, a district should consult with officials from the identified institutions and then reserve funds that are reasonable and necessary to serve children in local institutions for neglected children and those neglected children who are in community day school programs. Services should be comparable to those provided to children in participating Title I schools. If there is more than one institution in the district, the needs of each institution's educational program should be considered in determining the amount of funds for services to each institution. The number of children that reside in each institution on an average basis also may be used in determining the amount of funds to be expended for services to a particular institution.

Consultation

The district must consult with officials from the institution(s) to determine the type of services, including conducting a needs assessment. Documentation must be on file in the district Title I office that demonstrates institution officials are being consulted in a timely, ongoing manner.

Services

Services are provided to any children residing in a local institution for neglected children. Particular children are not identified for services since these children are very mobile. The district set-asides section of the Title I Application in GMAP must contain a brief description of Title I educational services for children in locally operated institutions for neglected and delinquent children. A needs assessment must be conducted to determine Title I services. Many students in the institution are served by Title I in the public schools they

attend. The following are examples of Title I services that may be provided to children in the institution:

- Tutors to work with students in addition to the assistance being provided to children who are attending public schools and receiving Title I services.
- Counseling/peer mediation services to help children in the transition from the institution to school.
- Computers and software to assist children with homework, reinforce concepts, etc.
- Books and materials such as encyclopedias, dictionaries and high interest/low vocabulary books to provide students with additional assistance. The books and materials cannot be religiously affiliated.

Religiously Affiliated Institutions

It is allowable for Title I personnel to go on the property to provide Title I educational services.

Evaluation

There is no separate evaluation for children in local institutions for neglected children for Title I accountability purposes.

Other

If a district is unable or unwilling to provide services to children in local institutions for neglected children, the state must reduce the district's allocation by the amount generated by the neglected children. Then KDE may transfer the funds to another district that agrees to assume educational responsibility for the neglected children. KDE may retain the funds if KDE assumes educational responsibility for the neglected children. If the institution closes and the children are transferred to an institution in another district, KDE must adjust the allocations of the two districts to reflect the transfer.

TITLE I AND ENGLISH LEARNERS

ESSA Sections 1111 and 1112

English learners (ELs) are those students whose primary language is a language other than English [See ESSA 8101(20) for full definition]. English learners are an extremely diverse group of students, representing hundreds of language backgrounds and nationalities (including many born in the US). An English learner student may be from any grade, academic proficiency or socioeconomic level in our society. The only characteristics shared by all English learners are a lack of English proficiency and the need for linguistic support to help them access opportunities, both academic and otherwise, in schools where English is the language of instruction. The purpose of this section is to highlight the role of English learners in ESSA, as well as briefly outline the requirements in serving English learner students.

English Learners and the Every Student Succeeds Act

Previously referred to as *Limited English Proficient (LEP)* or *English Language Learners (ELLs)*, the Every Student Succeeds Act (ESSA) replaced this language with the more student-first term, *English Learner*. This shift in terminology reflects a focus on the learner rather than a perceived limitation. ESSA also expanded the attention given to the academic and language proficiency aspects of English learners' participation in school. Expectations for serving English learner s are found in nearly all formula grant programs. Discussions about English learner s cannot be limited to Title III alone; Civil Rights laws, Title I and Title III all contain requirements for serving English learner students. An understanding of all requirements as well as increased cooperation between programs are necessary for providing effective English learner programming and services.

Basic Requirements Under Federal Law

All districts and schools have an obligation to provide appropriate services under Title VI of the Civil Rights Act of 1964 and the Equal Education Opportunities Act (EEOA) of 1974. Civil Rights and EEOA required English learner services cannot be paid for with Title I or Title III funds. All districts have an obligation under these laws to:

- Identify and assess all potential English learner students;
- Provide English learner students with a language assistance program;
- Staff and support English learner programs;
- Provide meaningful access to all curricular and extracurricular programs;
- Avoid unnecessary segregation of English learner students;
- Evaluate English learner students for special education services and provide special education and English language services;
- Meet the needs of English learner students who opt out of English learner programs or particular English learner services;
- Monitor and exit English learner student from English learner programs and services;

- Evaluate the effectiveness of the district’s English learner program; and
- Ensure meaningful communication with limited English proficient parents.

For more information on these legal obligations, see the [January 7, 2015 Dear Colleague Letter](#) issued by the Office for Civil Rights (OCR) at the U.S. Department of Education (USED) and the Civil Rights Division at the U.S. Department of Justice (DOJ). USED and the DOJ both are responsible for enforcing Title VI in the education context, while the DOJ is responsible for enforcing the EEOA. KDE’s [District Guide for English Learners Program](#) provides additional support for meeting these requirements.

Requirements Under Title I, Part A

The following chart outlines the requirements for ELs under Title I, Part A. Many of these requirements are not new, but rather have been moved from Title III to Title I.

Assessment and Accountability Requirements

The following chart provides a brief summary of the assessment and accountability requirements for serving ELs under Title I, Part A.

Title I, Part A Requirement	Summary and Significance
<p>English Language Proficiency Standards <i>ESSA 1111(b)(1)(F)</i></p>	<p>Each state must adopt English language proficiency (ELP) standards that are derived from the 4 recognized domains of speaking, listening, reading and writing; address the different proficiency levels of ELs; and are aligned with the challenging state academic standards.</p> <p>As a member of the WIDA consortium, Kentucky adopted the WIDA English Language Development Standards to meet this requirement.</p>
<p>English Language Proficiency Assessment <i>ESSA 1111(b)(2)(G)</i></p>	<p>Each state must demonstrate that LEAs will provide an annual assessment of ELP of all ELs and that the assessment is aligned with the state’s ELP standards. <i>(Note: This requirement has always been included under Title I, Part A. ESSA removed the identical requirement from Title III.)</i></p> <p>As a member of the WIDA consortium, Kentucky uses WIDA’s ACCESS for ELLs as the annual ELP assessment.</p>
<p>Accountability: English Learner Subgroup <i>ESSA 1111(b)(3)(B)</i></p>	<p>Former English learners are to be included in the English learner subgroup for accountability purposes for 4 years. Prior to ESSA, they were included for only 2 years.</p>
<p>Accountability: Long-Term Goals <i>ESSA 1111(c)(4)(A)(ii)</i></p>	<p>Each state must establish ambitious, state-designed, long-term goals, which include measures for English learners for proficiency on content assessments and increases in the percentage of English learners making progress in achieving ELP within a state-determined timeline.</p> <p>Districts receiving Title I funds are now held accountable for this measure rather than only districts receiving Title III funds.</p>

Title I, Part A Requirement	Summary and Significance
<p>Accountability: Annual Meaningful Differentiation <i>ESSA 1111(c)(4)(C)</i></p>	<p>Accountability determinations known under NCLB as Adequate Yearly Progress (AYP) are now known as Annual Meaningful Differentiation (AMD). AMD includes separate accountability indicators for English learners and the requirement to include differentiation for underperforming subgroups.</p> <p>A school may be identified for Targeted Support and Improvement (TSI) based solely on the ELP performance of the English learner subgroup, allowing school improvement funds to be used for English learners for the first time when available.</p>

Parent Engagement Requirements

ESSA 1112(e) includes several requirements related to the parents of all English learners in the district. Section E of the [Non-Regulatory Guidance](#) contains additional information on engaging the parents of English learners.

Parent Notification

ESSA 1112(e)(3)(A-B) requires each district using funds under Title I, Part A or Title III, Part A in order to provide services to English learners to provide parents with notification of their child’s identification as an English learner and their placement in a language instruction educational program (LIEP). The parental notification must include:

- The reason for the identification of the child as an English learner;
- The child’s level of English language proficiency, how the level was assessed, and the status of the child’s academic achievement;
- Methods of instruction used in the program in which the child is, or will be, participating, and the methods of instruction used in other available programs, including how the programs differ;
- How the program will meet the educational strengths and needs of the child and help the child achieve English language proficiency and meet academic standards;
- Exit requirements for the program, expected rate of transition to a classroom not tailored for English learner students, and expected rate of high school graduation;
- In the case of a child with a disability, how the program meets the annual goals in the child’s individualized education program (IEP); and
- Information regarding parents’ right to withdraw the child from a program upon their request, and to decline enrollment or choose another program or method of instruction, if available.

This notification must be provided no later than 30 days after the beginning of the school year or within the first two weeks of placement in an LIEP for students who enroll after the start of the school year.

All parents of English learners, not just newly enrolled English learners, should be notified annually of their child’s placement in an LIEP. Two notification letter templates and accompanying guidance are available on the [English Learner and Immigrant Resources](#) webpage.

- The Initial Identification Letter should be used for students identified as English learners by the district for the first time.
- The Continued Identification Letter should be used for students already identified as English learners by the district who have not yet reached proficiency and will therefore retain their English learner designation.

Use of the templates provided by KDE will help ensure all required components are included in the letter, however, districts are not required to use the KDE templates.

Parent Participation

ESSA 1112(e)(3)(C) states that each district must implement an effective means of outreach to the parents of all ELs to inform them of how they can:

- Be involved in the education of their children; and
- Be active participants in assisting their children to:
 - Attain English proficiency;
 - Achieve at high levels within a well-rounded education; and
 - Meet the challenging state academic standards expected of all students.

Implementing an effective means of outreach must include holding, and sending notice of opportunities for, regular meetings for the purpose of formulating and responding to recommendations from the parents of English learners.

Notice and Format

ESSA 1112(e)(4) requires the notice and information provided to parents under ESSA 1112(e) be in an understandable and uniform format and, to the extent practicable, provided in a language that the parents can understand. This is specific to the parent notification and outreach requirements of Title I, Part A. Providing translation and interpretation services related to core instruction and the core English learner program are district requirements under the civil rights laws.

Coordination with Other Programs

ESSA 1112(c) states that the district's Title I, Part A plan must assure that the district will coordinate and integrate services provided under Title I, Part A with other educational services at the district or school level, such as services for English learners, in order to increase program effectiveness, eliminate duplication and reduce fragmentation of the instructional program.

The Title I program should support and supplement the district's core English learner program, as well as work in cooperation with the English learner and/or Title III programs in order to maximize resources. The two programs should collaborate to design programs and interventions which address the needs of English learner students. The regular sharing of information and expertise will allow both programs to provide effective services to English learners.

Title III, Part A

Title III of the Elementary and Secondary Education Act (ESEA) is part of legislation enacted to ensure that English learners, including immigrant children and youth, develop English proficiency and meet the same academic content and academic achievement standards that other children are expected to meet. The purposes of Title III are [See ESSA 3102]:

1. To help ensure English learner attain English proficiency and develop high levels of academic achievement in English;
2. To assist English learner in achieving high levels in academic subjects so they can meet the same challenging academic standards all children are expected to meet;
3. To assist in establishing, implementing and sustaining effective programs designed to assist in teaching English learners;
4. To assist in the development and enhancement of the capacity to provide effective instructional programs designed to prepare English learners to enter all-English instructional settings; and
5. To promote parent, family and community engagement in programs and services for English learners.

Title III grants provide states and their districts funds to **supplement** their English language instructional programs. Districts with English learner students can apply for a Title III subgrant. To qualify as a stand-alone Title III district, a district must have enough EL students to generate \$10,000. Districts which do not meet that requirement can join or form a consortium with other districts. Districts creating a consortium must qualify for a minimum of \$10,000 in subgrant allocations combined. Title III funds are supplemental to local, state and federal funds and therefore cannot be used to meet any of the Civil Rights requirements [See ESSA 3115(g)].

Title III funds must be used by districts to provide English learner programs, provide professional development to teachers and school leaders related to meeting the academic and language needs of English learner, and deliver activities that promote English learner parent, family and community engagement [See ESSA 3115(c)]. These requirements must be met before Title III funds can be used for other activities.

For more information on Title III, consult USED's [Non-Regulatory Guidance: English Learners and Title III of the Elementary and Secondary Education Act \(ESEA\), as amended by the Every Student Succeeds Act \(ESSA\)](#) and [Non-Regulatory Guidance Addendum](#), as well as KDE's [Title III – English Learner and Immigrant Students](#) webpage.

Hierarchy of Funding for English Learner Programs

Districts must provide a core English learner program prior to utilizing Title I and Title III funds for services. The following list outlines the succession of programs and funding sources used with English learner eligible for both Title I and Title III services.

1. **Core Instruction** – The core instruction program is provided to all students using state and local funds.
2. **Core EL Program** – The core English learner program is required by federal law (see *Lau* 1974 and *Castañeda* 1981) and is provided to all English learner students. The English development services provided in the core English learner program are in addition to the core instruction program. State and

local funds must be used to provide this program; federal funds (such as Title I and Title III) *cannot* be used to provide the core English learner program.

3. **Title I, Part A** – The Title I, Part A program includes supplemental services for Title I-eligible English learner students. In a schoolwide program, all English learner students are eligible. In a targeted assistance program, English learner students are eligible using the same criteria as all students. Title I federal funds can be used to provide academic support to students (including English learner) to meet challenging state academic achievement standards. Districts may use Title I, Part A funds to provide an LIEP for Title I eligible English learner students.
4. **Title III, Part A** – The Title III, Part A program provides supplemental language development services to all English learner students regardless of Title I participation. The Title III program is above and beyond the core instruction, core English learner program, and if applicable, Title I services. Districts are required to use Title III funds to provide English learner programs, professional development, and parent, family and community engagement activities. Once these requirements have been met, districts may not have enough Title III funding left to cover the English learner requirements under Title I. Title III funds may be used to meet the Title I English learner requirements *only* if all Title III requirements have been met.

Additional Resources

- The Council of Chief State School Officers' (CCSSO) [Major Provisions for Every Student Succeeds Act \(ESSA\) Related to the Education of English Learners](#)
- The Office of English Language Acquisition's (OELA) [English Learner Toolkit](#)
- KDE's [English Learner and Immigrant Resources](#) webpage

TIME AND EFFORT – PERSONNEL PAID FROM TITLE I

Time and effort reporting must be maintained for all employees who are paid fully or partly from Title I funds (or any federal funding source). This applies to staff at the district and school level paid completely or partially from Title I funds. These records are often referred to as “time and effort” records. Time and effort records must reflect an after-the-fact distribution of the actual activity of the employee.

Any federal cost, including salaries, must be allocable, that is, provide a benefit to the program that is proportionate to the relative benefits received. Federal funds can only pay for goods or services to the extent there is a chargeable benefit to the federal program. As an example, consider a school operating targeted assistance program (TAS). The school plans to set up a computer lab that will be used by Title I students 50 percent of the time and used by all students for the remaining 50 percent. Title I funds may only pay for 50 percent of the cost of the computer lab and the program must maintain records documenting, at a minimum, the total cost of the computer lab, the amount paid by Title I and other sources, and that the actual use of the computer lab by the Title I program actually was 50 percent of the time the lab was used.

[2 C.F.R. 200.430](#) states that the salaries and wages of employees who work on federal programs may be paid with federal funds as long as appropriate time distribution records are maintained. These records must:

- Be supported by a system of internal controls that provides reasonable assurance that the charges are accurate, allowable and properly allocated;
- Be incorporated into official records;
- Reasonably reflect total activity for which the employee is compensated, not exceeding 100 percent of compensated activities;
- Encompass both federally assisted and all other activities compensated by the district on an integrated basis;
- Comply with the established accounting policies and practices of the nonfederal entity; and
- Support the distribution of the employee’s salary or wages among specific activities or costs objectives.

Written policies and procedures are essential to implementing an effective time reporting system. Districts should develop instructions to ensure proper time and effort is maintained. The [Cost Allocation Guide for State and Local Governments, U.S. Department of Education \(2019\)](#) provides an outline of the sections that should be included in the district’s instructions, to include the following:

1. The completion of time and attendance reporting;
2. The approval cycle that is required;
3. The processing of personnel charges to federal awards; and
4. The internal review process that will be established to ensure effective internal control over the federal award.

Generally, the information should provide sufficient detail to permit an understanding of how the system will operate from the point the time is worked to the point the time is recorded in the accounting records and

charged to federal awards.

Flexibility in Time and Effort Reporting

Regulations allow for some flexibility in time and effort reporting. Entities have flexibility in devising their internal controls, such as documented policies and procedures, provided they consistently apply and adhere to those internal controls to meet the standards. The uniform guidance emphasizes internal controls by stating “***the non-federal entities must have sufficiently strong controls to ensure that personnel costs are justified.***”

Personnel Activity Reports (PARs) and semi-annual certifications are not required by the federal government, but do offer examples of strong controls that meet time and effort reporting requirements. If a district has not established its own methods for documenting time and effort, then PAR reports and semi-annual certifications should be used to meet documentation requirements. (**Refer below for further information about semi-annual certifications under Single Cost Objectives, and PARs under Multiple Cost Objectives.*)

2 CFR 200.430(i) explains the standards for documentation of personnel expenses. Namely, a district’s internal controls should ensure the following:

Accurately reflect the work performed. The charges to federal awards for salaries and wages must be based on records that accurately reflect the work performed. These records must be supported by a system of internal controls which provides reasonable assurance that the charges are *accurate, allowable* and properly *allocated*.

If the district uses PARs and semi-annual certifications as part of the process for time and effort reporting, the district’s written procedures, as part of their system of internal controls, should document this. Internal controls can include any measure that will support the veracity and accuracy of the documentation supporting the charges to Title I for salaries. Internal controls should include documentation which can be verified. This documentation could include signatures (including electronic signatures) and documentation from a person with first-hand knowledge of the work.

After-the-fact reporting. Another requirement for time and effort reporting is a process for after-the-fact review of interim charges made to the federal award based on budget estimates.

If a district puts a salary in their Title I application for an employee who is paid partly or fully with Title I, and pays that person accordingly throughout the year, there must be a process in place to review the time the person actually worked on Title I activities compared to the proportionate amount they were paid with Title I funds. All necessary adjustment must be made so that the final amount charged to the federal award for the salary is accurate, allowable and properly allocated (2 CFR 200.430 (i)(8)). This justification must occur at least annually, and the process and timeline should be explained in the district’s written time and effort procedures.

The frequency of reporting depends on whether an employee works on a single “cost objective” or multiple “cost objectives.” A cost objective is defined as follows: A function, organizational subdivision, contract, grant or other activity for which cost data are needed and for which costs are incurred.

Personnel Working with One Cost Objective

District and school personnel who work solely on a single cost objective can certify, at a district-determined frequency (for example, semi-annually or annually) that he/she worked solely on that cost objective for the period covered.

A “single cost objective” can be, for example, a single function, a single grant or a single activity. It is possible to work on a single cost objective even if an employee works on more than one federal award or on a federal award and a non-federal award. The key to determining whether an employee is working on a single cost objective is **whether the employee’s salary and wages can be supported in full from each of the federal awards on which the employee is working, or from the federal award alone if the employee’s salary also is paid with non-federal funds.**

Examples of a “single cost objective”:

- A supplemental math teacher works in a school serving low-achieving students with 50 percent Title I, Part A funds and 50 percent general funds. Teaching math to low-achieving students is a single cost objective because it can be fully supported under Title I, Part A.
- A teacher in a Title I schoolwide school is paid with general funds to teach first grade in the morning to decrease class size for reading. This teacher also is paid with Title I, Part A funds to teach a supplemental reading recovery class in the afternoon. Both her functions are fully supportable with Title I, Part A funds, and the schoolwide program constitutes a single cost objective.
- A non-supplemental elementary school teacher is paid with general funds, but the district also pays her with Title I, Part A funds to provide after-school tutoring for low-achieving students. Although the teacher could not be paid with Title I, Part A funds to provide non-supplemental elementary education, the portion of her time spent on after-school tutoring is easily separated from her teaching position by her schedule. Accordingly, the teacher’s after-school tutoring is a single cost objective.
- A Read to Achieve (RTA) teacher is paid part time out of an RTA grant, but the grant does not cover the full salary and the teacher is paid out of Title I for the remainder of his time as a reading interventionist. Reading intervention is a single cost objective because it can be fully supported under Title I, Part A.

KDE provides an example of a strong internal control for staff working from a single cost objective in the form of a “semi-annual certification.” This certification example indicates the period covered by the certification and is signed by the employee and the supervisor who has first-hand knowledge of the work performed. A sample semi-annual certification is located in the [Title I, Part A Sample Documents](#) folder.

Personnel Working with More than One Cost Objective

District and school personnel who work from multiple cost objectives must maintain time and effort distribution records in accordance with 2 CFR section 200.430(i)(1)(vii) that support the portion of time and effort dedicated to:

- (i) The federal program or cost objective; and
- (ii) Each other program or cost objective supported by consolidated federal funds or other revenue source

The records must reflect an “after-the-fact distribution” of the employee’s actual activity and must account for the percentage of time for which the employee is paid from each program.

Examples of “multiple cost objectives”:

- A teacher works part time in a Targeted Assistance School (TAS) specifically with identified students, and part time out of another funding source to support all students in the school. Because only the TAS portion of this teacher’s time could be supported by Title I, Part A funds, this constitutes multiple cost objectives.
- A librarian works most of their schedule in the library and is paid with general funds, but also is paid part time from Title I, Part A to support reading intervention in small groups. The non-supplemental librarian position cannot be supported with Title I, Part A funds, but the reading intervention activities can be supported by Title I, Part A. Therefore, the librarian is working under multiple cost objectives.
- A teacher works part time as a Title III interventionist for English learners and is paid with Title III funds, and works part time in a third-grade classroom as supplementary classroom reduction, paid out of Title I. Because the English learner Intervention and the classroom reduction are two separate activities, this is an example of multiple cost objectives.
- A PD coach works part time supporting the professional development activities of the school, and part time as a math interventionist working directly with students. Because professional development to teachers and intervention to students are two separate activities, this is an example of multiple cost objectives.
- An administrator working 35% of their time on Title I activities and paid with Title I funds, 20% on Title II activities and paid with Title II funds, and the remaining 45% of their time is paid from general funds to support the district in other activities would be considered an employee working multiple cost objectives.

KDE provides an example of a strong internal control for staff working from multiple cost objectives in the form of a “Personnel Activity Record” or PAR.

A blank PAR report is located in the [Title I, Part A Sample Documents](#) folder.

Sample Completed PAR

Personnel Activity Report (PAR) for District Personnel Working with More than 1 Program

Employee Name: John Smith

Date Range: From Oct. 1, 2021 through Oct. 29, 2021

Office/School: Federal Programs

Reporting Period Date	Cost Objective: <u>Title I, Part A</u> Hours	Cost Objective: <u>Title III, Part A</u> Hours	Total Hours
10/1	5	3	8
10/4	5	3	8
10/5	4.5	3.5	8
10/6	4	4	8
10/7	5	3	8
10/8	2	6	8
10/11	5	3	8
10/12	3.5	4.5	8
10/13	5	3	8
10/14	6	2	8
10/15	5	3	8
10/18	5	3	8
10/19	2	6	8
10/20	5.5	2.5	8
10/21	5	3	8
10/22	6	2	8
10/25	5	3	8
10/26	4.5	3.5	8
10/27	5	3	8
10/28	3.5	4.5	8
10/29	5	3	8

This certifies that above is an accurate representation of the work performed during the time period indicated.

Employee Signature: John Smith

Supervisor Signature: Jane Doe

There are other methods besides PAR reports and semi-annual certifications that districts could use in their time and effort reporting process, as long as the requirements of 2 CFR 200.430(i) are met. Should a district wish to use a substitute or alternative system, a request must be submitted to KDE for approval.

[The Compliance Supplement 2020](#)

[Cost Allocation Guide for State and Local Governments, U.S. Department of Education \(2019\)](#)

Code of Federal Regulations [2 C.F.R. 200.430](#)

Appendix A – Title I Coordinator’s Year at a Glance

*This is a suggested timeline that could vary based on different district systems and timelines.
This is not an all-inclusive list.*

Ongoing

- Seek technical assistance from the [Title I consultant](#) assigned to the district.
- Locate the U.S. Department of Education’s website, www.ed.gov for guidance relating to Title I, Part A.
- Refer to the Kentucky Department of Education’s [Title I website](#) for Title I information and resources.
- Watch monthly Title I webinars and read monthly Title I newsletters accessible through the [Documents and Resources](#) webpage current information and updates.
- Continue to assess the needs of students, educators and other relevant stakeholders.
- Review schools’ comprehensive school improvement plans (CSIPs) to ensure Title I activities are included and funding for those activities are aligned within the district plan (CDIP).
- Collaboration with the local homeless liaison and foster care point of contact for identifying homeless and foster care student needs and services as appropriate.
- Collaboration with the local child welfare agency and the foster care point of contact to ensure transportation agreements are being maintained.
- If applicable, ongoing consultation with the private school administrators and Title I staff providing services.
- Meet at least quarterly with finance officer to ensure alignment between GMAP and MUNIS and timely expenditure of funds to meet the 15% carryover limitation.
- Collect signed Time and Effort records for Title I staff following the internal controls determined by the district.
- Submit requests to amend GMAP application, as needs change.
- Review and revise parent and family engagement policies and/or plans in consultation with parents as part of the regular review and evaluation process.

August

- Review and update parent/guardian notification materials (testing transparency, teacher qualification request letter). Distribute by direct and indirect means no later than the beginning of the school year.
- Revise and align GMAP and MUNIS from previous year.
- Develop a system to collect and organize documentation related to the district’s Title I program for state monitoring reviews.
- Consult with district (Human Resources or Finance) staff on comparability requirements (list of Title I vs. non-Title I).
- Review and update student selection criteria sheet and student selection procedure for Targeted Assistance Schools.
- Ensure Title I schools have created rank-ordered student selection lists of Title I students in Targeted Assistance Schools.
- Verify that private school services, when applicable, begin at the same time as services begin in public schools.

- Update contact information with KDE (using the Person Role Manager web application), if needed.

September

- Collect school schedules of annual Title I meetings for parents. KDE recommends these meetings be conducted by the end of October.
- Distribute the district's written parent and family engagement policy to all participating parents and family members served by Title I [to include private school(s)].
- Ensure that each Title I school distributes its written parent and family engagement policy and compact to all participating parents and family members. The policy should be made available to the community.
- Prepare to pull the student enrollment summary report from Infinite Campus for attendance numbers by the last day of the second school month or a date between that day and Oct. 31 for the purpose of the comparability report.
- Prepare staff listing and FTE by location and funding source to use for the purpose of the comparability report.
- Determine that all applicable parent notifications have been disseminated by direct and indirect means.
- Consult with participating facilities for neglected and delinquent youth to develop an evaluation of services.
- Ensure Targeted Assistance Schools have set up files, notified parents and implemented services.
- Review and update Title I personnel lists for each building.

October

- Conduct annual Title I meetings at each Title I school and collect evidence of the meetings.
- Calculate comparability based on October data and make appropriate adjustments to Title I schools shown to be non-comparable.
- Initiate planning process for new CDIP or CSIPs, if applicable.

November

- Submit Comparability Report in GMAP.
- Ensure schools have documented the distribution of school-family compacts (e.g., copies of signed compacts, signatures of parents who have received the compact).
- Discussion of school-family compact as it relates to individual student achievement during a parent-teacher conference should occur by the end of the month.

December

- Monitor implementation of schoolwide parent and family engagement activities.
- Ensure that methodology regarding supplement not supplant is on file at the district office, if required for your district.

January

- Utilize the Hold Harmless Notification from KDE for planning purposes for the upcoming school year.
- Establish a plan and timeline for working with other federal programs in the district to coordinate the consolidated application in the next year.

- Contact private school officials to set the consultation calendar for the *upcoming* application and school year.

February

- Coordinate with early childhood programs to plan transition of preschool students.

March

- Prepare notification for participation letter for private/home schools to be sent out in the spring.
- Meet with school principals to collect information on use of funds to support Title I programs for the next funding application.
- Use available data (e.g., economically disadvantaged, other low-income data or a combination of poverty indicators) to determine eligible schools for Title I services (for next school year).
- Collect headcount data for student participation, Title I-A private school participation and Title I-D neglected and delinquent programs. This information should be prepared and entered on the Consolidated State Performance Report page in the Title I, Part A application in GMAP (for next school year's application).

April

- Conduct other stakeholder consultations on the development of the LEA/school Title I plan. Stakeholders include parents/families, private schools, homeless education programs, migrant education programs, English learner programs and school leadership teams.
- Conduct annual evaluation of district parent and family engagement policy in improving the academic quality of all schools.
- Evaluate the services with local neglected or delinquent facilities, if applicable. Develop a plan for ongoing consultation for the upcoming school year.
- Consult with the local homeless liaison to determine number of homeless students and amount of reservation of Title I funds.
- Consult with eligible private schools and obtain affirmation of consultation with participating private school officials.
- Consult with local early childhood stakeholders (Exceptional Children, Pre-K, Head Start, etc.) to coordinate early childhood services (Title I Pre-K) as appropriate.

May-June-July

- Meet with district financial staff to reconcile fiscal issues prior to the end-of-year closeout.
- Determine roles and responsibilities of appropriate LEA representatives to determine comparability requirements.
- Gather data on private school services and evaluate programs for the upcoming year.
- Review and update district parent and family engagement policy based on data (e.g., evaluations), as needed.
- Review and update school parent and family engagement policy based on data (e.g., evaluations), jointly with parents, as needed.
- Review and update school–family compact, jointly with parents, as needed.

Appendix B — Resources to Improve Parent and Family Engagement

1. [Appalachia Regional Comprehensive Center](#): Offering resources on ESSA for policymakers and practitioners.
2. [¡Colorín Colorado!](#) A bilingual site featuring information, activities and advice for educators and families of English learners (WETA-TV)
3. [Family and Community Engagement](#) (USED)
4. [Dual Capacity-Building Framework for Family-School Partnerships](#) (USED)
5. [Global Family Research Project](#) Shaping 21st-century learning opportunities so that all children and youth thrive.
6. [National Center for Family and Community Connections with Schools](#) Supporting school, family and community connections to increase school success. (American Institutes for Research)
7. [National Center for Family Learning](#) NCFL exists to create a culture of family engagement across the educational spectrum.
8. [The Education Trust](#) Fierce advocates for the high academic achievement of all students — particularly those of color or living in poverty.
9. [Prichard Committee for Academic Excellence](#) To provide a public voice advocating for continually improved education for all Kentuckians.
10. [The “What Works Clearinghouse” \(WWC\)](#) Providing educators with the information they need to make evidence-based decisions. (Institute of Education Sciences: National Center for Education Evaluation and Regional Assistance)
11. [Family Engagement: Resource Roundup](#) from [Edutopia.org](#) : A collection of tips, strategies and resources to help improve the connection from home to school and expand parent involvement.

Appendix C — Effective District Parent and Family Engagement Policy Checklist

The following requirements for a school level parent and family engagement policy can be found in ESSA 1116 (a)(2)(A-F) and ESSA 1116 (e)-(f).

The LEA has a written policy. The policy establishes the district’s expectations and objectives for meaningful parent and family involvement and describes how the district will:

Involve parents in policy and plan development

- Involve parents in jointly developing and agreeing on the district PFE policy.
- Involve parents and family members in jointly developing the district plan (CDIP) and the development of school level improvement plans (CSIPs).

Coordinate and integrate support and strategies

- Provide the coordination, technical assistance and other support necessary to assist schools in planning and implementing effective parent and family involvement activities to improve student academic achievement and school performance. *This may include meaningful consultation with employers, business leaders and philanthropic organizations, or individuals with expertise in effectively engaging parents and family members in education; and*
- Coordinate and integrate parent and family engagement strategies under Title I with parent and family engagement strategies, to the extent feasible and appropriate, with other relevant federal, state and local laws and programs.

Evaluate the policy

- Conduct, with the meaningful involvement of parents and family members, an annual evaluation of the content and effectiveness of the parent and family engagement policy in improving the academic quality of all schools served by Title I, including identifying:
 - Barriers to greater participation by parents in activities (with particular attention to parents who are economically disadvantaged, are disabled, have limited English proficiency, have limited literacy or are of any racial or ethnic minority background);
 - The needs of parents and family members to assist with the learning of their children, including engaging with school personnel and teachers; and
 - Strategies to support successful school and family interactions.
- Use the findings of evaluations to design evidence-based strategies for more effective parental involvement and to revise, if necessary, the parent and family engagement policies described in this section.

Involve parents at the school level

- Involve parents in the activities of the schools served under Title I. *This may include establishing a parent advisory board comprised of a sufficient number and representative group of parents or family members served by the district to adequately represent the needs of the population served by the district.*
- Involve parents in developing, revising and reviewing the parent and family engagement policy.

Build capacity for involvement

- Provide assistance to parents in understanding such topics as the challenging state academic standards, state and local academic assessments, the requirements of Title I and how to monitor a child’s progress and work with educators to improve the achievement of their children.

- Provide materials and training to help parents to work with their children to improve their children’s achievement, such as literacy training and using technology (including education about the harms of copyright piracy), as appropriate, to foster parental involvement.
- Educate teachers, specialized instructional support personnel, principals and other school leaders, and other staff — with the assistance of parents — on: the value and utility of contributions of parents; how to reach out to, communicate with and work with parents as equal partners; implement and coordinate parent programs; and build ties between parents and the school.
- Coordinate and integrate, to the extent feasible and appropriate, parent involvement programs and activities with other federal, state, and local programs, including public school programs, and conduct other activities, such as parent resource centers, that encourage and support parents in more fully participating in the education of their children.
- Ensure that information related to school and parent programs, meetings and other activities is sent to the parents of participating children in a format and, to the extent practicable, in a language the parents can understand.

Optional

- Involve parents in the development of training for teachers, principals and other educators to improve the effectiveness of such training;
- Provide necessary literacy training from funds received under Title I, if the local educational agency has exhausted all other reasonably available sources of funding for such training;
- Pay reasonable and necessary expenses associated with local parental involvement activities, which may include transportation and childcare costs, to enable parents to participate in school-related meetings and training sessions;
- Train parents to enhance the involvement of other parents;
- Arrange school meetings at a variety of times, or conduct in-home conferences between teachers or other educators who work directly with participating children to maximize parental involvement and participation among parents who are unable to attend such conferences at school;
- Adopt and implement model approaches to improving parental involvement;
- Establish a districtwide parent advisory council to provide advice on all matters related to parental involvement in programs supported under this section;
- Develop appropriate roles for community-based organizations and businesses in parent involvement activities; and
- Provide such other reasonable support for parental involvement activities under Title I as parents may request.

Make accessible

- Provide opportunities, to the extent practicable, for the informed participation of parents and family members (including parents and family members who have limited English proficiency, parents and family members with disabilities and parents and family members of migratory children), including providing information and school reports required under section 1111, in a format and, to the extent practicable, in a language such parents understand.
- Distribute the policy to parents and family members of participating children.

Appendix D — Effective School Parent and Family Engagement Policy Checklist

The following requirements for a school-level parent and family engagement policy can be found in ESSA 1116(b) and ESSA 1116 (c) - (f).

The school has a written policy. The policy establishes the school's expectations and objectives for meaningful parent and family involvement and describes how the school will:

Involve parents in policy and plan development

- Involve parents in an organized, ongoing and timely way in the planning, review and improvement of the program;
- Involve parents in the planning, review, and improvement of the school parent and family engagement policy.

Offer parent meetings

- Convene an annual meeting at a convenient time, which all parents of participating children shall be invited to and encouraged to attend, to inform parents of their school's participation in Title I and explain the requirements of Title I, and the right of the parents to be involved.
- Offer a flexible number of meetings, such as meetings in the morning or evening, and provide, with funds provided by Title I, childcare or home visits as such services relate to parental involvement.

Provide parent information

Provide the following to the parents of participating children:

- Timely information about Title I;
- A description and explanation of the curriculum in use at the school, the forms of academic assessment used to measure student progress, and the achievement levels of the challenging state academic standards; and
- If requested by parents, opportunities for regular meetings to formulate suggestions and to participate, as appropriate, in decisions relating to the education of their children and respond to any such suggestions as soon as practicably possible; and
- If the schoolwide program plan under section 1114(b) is not satisfactory to the parents of participating children, submit any parent comments on the plan when the school makes the plan available to the local educational agency.

Share responsibilities for high student academic achievement:

Each school will jointly develop with parents a school-parent compact that outlines how parents, the entire school staff and students will share the responsibility for improved student academic achievement, and how the school and parents will build and develop a partnership to help children achieve the state's high standards.

The compact shall:

- Describe the school's responsibility to provide high-quality curriculum and instruction in a supportive and effective learning environment that enables the children served to meet the state academic standards, and the ways in which each parent will be responsible for supporting their children's learning -volunteering in their child's classroom and participating, as appropriate, in decisions relating to the education of their children and positive use of extra-curricular time; and
- Address the importance of communication between teachers and parents on an ongoing basis through, at a minimum:

- Parent-teacher conferences in elementary schools, at least annually, during which the compact shall be discussed as the compact relates to the individual child’s achievement.
- Frequent reports to parents on their children’s progress.
- Reasonable access to staff, opportunities to volunteer and participate in their child’s class, and observation of classroom activities, and ensuring regular two-way, meaningful communication between family members and school staff in a language that family members can understand.
- KDE requires school-parent compacts to be signed by all involved parties and kept on file at each school as documentation.

Build capacity for involvement

- Provide assistance to parents in understanding such topics as the challenging state academic standards, state and local academic assessments, the requirements of Title I and how to monitor a child’s progress and work with educators to improve the achievement of their children.
- Provide materials and training to help parents to work with their children to improve their children’s achievement, such as literacy training and using technology (including education about the harms of copyright piracy) to foster parental involvement;
- Educate teachers, specialized instructional support personnel, principals and other school leaders and other staff — with the assistance of parents — on: the value and utility of contributions of parents; how to reach out to, communicate with and work with parents as equal partners; how to implement and coordinate parent programs; and how to build ties between parents and the school;
- Coordinate and integrate parent involvement programs and activities with other federal, state and local programs, including public school programs, and conduct other activities, such as parent resource centers, that encourage and support parents in more fully participating in the education of their children;
- Ensure that information related to school and parent programs, meetings and other activities is sent to the parents of participating children in a format in a language the parents can understand;

Optional

- Involve parents in the development of training for teachers, principals and other educators to improve the effectiveness of such training;
- Provide necessary literacy training from the Title I funds received if the local educational agency has exhausted all other reasonably available sources of funding for such training;
- Pay reasonable and necessary expenses associated with local parental involvement activities, which may include transportation and childcare costs, to enable parents to participate in school-related meetings and training sessions;
- Train parents to enhance the involvement of other parents;
- Arrange school meetings at a variety of times, or conduct in-home conferences between teachers or other educators, who work directly with participating children, with parents who are unable to attend such conferences at school in order to maximize parental involvement and participation;
- Adopt and implement model approaches to improving parental involvement;
- Establish a districtwide parent advisory council to provide advice on all matters related to parental involvement in programs supported under this section;
- Develop appropriate roles for community-based organizations and businesses in parent involvement activities; and

- Provide such other reasonable support for parental involvement activities under this section as parents may request.

Keep the policy updated

- Update the policy periodically to meet the changing needs of the parents and the school.

Make accessible

- Notify parents of the policy in an understandable and uniform format, and to the extent practicable, in a language the parents can understand.
- Make the policy available to the local community.
- Provide opportunities, to the extent practicable, for the informed participation of parents and family members (including parents and family members who have limited English proficiency, parents and family members with disabilities, and parents and family members of migratory children), including providing information and school reports required under section 1111 in a format and, to the extent practicable, in a language such parents understand.
- Distribute the policy to parents and family members of participating children.

Appendix E — Effective School-Family Compact Checklist

Each school will jointly develop with parents a school-parent compact that outlines how parents, the entire school staff, and students will share the responsibility for improved student academic achievement and how the school and parents will build and develop a partnership to help children achieve the state's high standards. The compact shall:

- Describe the school's responsibility to provide high-quality curriculum and instruction in a supportive and effective learning environment that enables the children served to meet the state academic standards,
 - Describe the ways in which each parent will be responsible for supporting their children's learning, volunteering in their child's classroom and participating, as appropriate, in decisions relating to the education of their children and positive use of extra-curricular time;
 - Address the importance of communication between teachers and parents on an ongoing basis through, at a minimum:
 - Parent-teacher conferences in elementary schools, at least annually, during which the compact shall be discussed as the compact relates to the individual child's achievement.
 - Frequent reports to parents on their children's progress.
 - Reasonable access to staff, opportunities to volunteer and participate in their child's class and observation of classroom activities, and ensuring regular two-way, meaningful communication between family members and school staff in a language that family members can understand.
 - KDE requires school-parent compacts to be signed by all involved parties and kept on file at each school as documentation.
-

School-Family Compact Best Practices

Responsibilities of the School:

Explain district and school goals to meet student academic achievement standards.

- Ensure that evidence-based parent and family engagement activities are embedded in the CSIP.
- Create specific goals based on achievement data.
- Maintain a dialogue with families by encouraging questions, suggestions and feedback regarding the Title I program.
- Get input from students. Ask students how they want their teachers and families to support them.

Describe teachers' responsibility for supporting student learning and providing high-quality curriculum and instruction:

- Provide details on how teachers will help families understand what children are learning and doing in class.
- Be specific in how teachers will support parent participation at each grade level.
- Provide real-life connections for students to what they are learning in class.
- Encourage students to share what they are learning in class with their families.

Responsibilities of the Family:

Describe parents' responsibility for supporting student learning.

- Require regular school attendance.
- Provide a quiet, well-lit study area.

- Establish a regular time for homework.
- Encourage positive attitudes about school.
- Attend parent-teacher conferences.

Responsibilities of the Student:

Describe students' responsibility for their learning.

- Come to school prepared to learn.
- Complete assigned schoolwork and homework on time.
- Follow school rules.
- Show respect for yourself and others.

An effective school-family compact also should:

- Describe how families are involved in jointly developing and reviewing the compact.
- Describe the provision of resources to take part in the process of parent participation, which may include child-care or transportation.
- Describe how schools will work with families to eliminate confusing terminology and ensure the compact clearly explains expectations.
- Describe how schools will consult with families to determine what methods of communication work best for them.
- Be accessible, to the extent practicable, in a language that parents understand.
- Be signed by all participating stakeholders (teacher, parent and student).

Communication Student Progress:

Describe multiple methods for regular teacher-family communication.

- Incorporate discussing responsibilities listed in the compact during parent-teacher conferences.
- Support families and students through follow-up steps:
 - Keep families up to date on student progress.
 - Provide families with tips on home learning.
- Consult with families and determine what methods of communication work best for them.

Appendix F – Suggested Timeline for Consultation with Private School Officials¹

MONTH	DISTRICT ACTIVITY
January	<ul style="list-style-type: none"> Contact private school officials to determine intent to participate and set up consultation calendar for upcoming school year.
March/April	<p>Initial consultation meeting: 34 C.F.R. 200.63</p> <ol style="list-style-type: none"> Determine data source for counting eligible students (identifying pool of eligible students is private school responsibility). 34 C.F.R. 200.78(a)(2) <ul style="list-style-type: none"> Same poverty measure used to count public school students, which usually is free and reduced-price lunch; Survey of private school parents asking for income data, address and grade level of children from which the LEA must extrapolate these data; Alternative poverty data such as scholarships, Temporary Aid to Needy Families (TANF), Medicaid, etc. OR Decide through consultation to use proportionality Identify multiple, educationally related criteria for choosing students (LEA responsibility). 34 C.F.R. 200.62(b) Discuss academic goals of eligible students, appropriate assessments. Solicit views on service delivery options, including "pooling" option. Discuss districtwide instructional set-asides and administrative costs. Determine services for parents and teachers of participating students. Inform private school officials of their right to file a complaint to state education agency if they feel their views are not adequately considered. Collect signed affirmation from private school officials.
May/June	<ul style="list-style-type: none"> Determine equitable services amount based on number of eligible students and per-pupil allocations. 34 C.F.R. 200.64 Identify students to participate. Districts must provide opportunities for consultation with private school officials if program is modified or private school officials request continued discussions.
August	<ul style="list-style-type: none"> Establish service start date (same as public school start date). Finalize roster of participating students.
September	<ul style="list-style-type: none"> Make needed changes to student roster. Begin services with current fiscal year funds.
October-June	<ul style="list-style-type: none"> Regular visits by LEA supervisor to Title I classrooms and regular communications with private school teachers and officials about student progress and program compliance. Assess student progress and evaluate program effectiveness. Determine criteria for making program modifications when annual progress is not achieved. Conduct professional development and parent and family engagement activities. 34 C.F.R. 200.65

¹ This is not an official U.S. Department of Education document. It is provided only as an example.

Appendix G – Guidance for Districts on Title I, Part A Set-Asides

Set-asides are funds that are reserved at the district level. In some cases, districts are required to reserve funds for certain activities under Title I, Part A. In other cases, reservations are discretionary. The purpose of this document is to provide guidance on acceptable uses of district set-asides and, conversely, on situations when the Kentucky Department of Education (KDE) will not allow set-asides and will instead require funds to be allocated to schools.

Several sources were used to guide the creation of this document:

- Applicable statute and regulations at the state and federal levels;
- KDE staff;
- Title I Committee of Practitioners;
- Staff from other state education agencies (SEAs);
- Relevant guidance documents from other states;
- Title I applications in GMAP (Grants Management Application and Planning System); and
- [Senate Bill 1 Guidance for School-based Decision Making](#).

Need for Guidance on District Set-Asides

KDE is required to provide oversight of Title I, Part A programs. Responsibilities include reviewing and approving applications ([ESSA 1112\(a\)\(3\)\(B\)](#)) and providing technical assistance ([ESSA 1111\(c\)](#)), among other requirements. This guidance is intended to provide technical assistance for schools and districts to use funds effectively and in accordance with the purpose and intent of Title I.

Currently, some Kentucky school districts are reserving large percentages of their Title I allocations at the district level. This practice could have several intended and unintended effects, including:

- Decreasing the amount of funds schools receive;
- Decreasing school opportunity to effectively implement a schoolwide program, including use and control of funds necessary for this work;
- Districtwide activities may not accurately address individual schools' needs assessments; and/or
- If the district set-aside is subsequently redistributed to schools by paying for additional staff or resources, federal rank and serve rules could be violated.

Required Reservations

Before distributing funds to Title I schools, two set-asides are automatically calculated and deducted from district allocations in GMAP. An automatic set-aside is calculated for services to private school students if the district serves private schools. And, if the district's allocation is greater than \$500,000, an automatic set-aside is calculated and reserved for parent and family engagement activities. Districts also must reserve funds "off the top" of the Title I allocation when serving homeless students and when serving students at locally operated neglected institutions. It is important to note that district set-asides must be used only at Title I schools, except in these instances:

- **Homeless:** Districts must set aside a reasonable and necessary amount to provide services for homeless children. These funds can be used to provide services to students who attend Title I and non-Title I schools.
- **McKinney-Vento:** Districts receiving competitive McKinney-Vento grants are required to reserve an amount from Title I, Part A to supplement services provided to homeless students.
- **Locally Operated Neglected Institutions:** Districts with locally operated neglected institutions must reserve a reasonable and necessary amount to provide supplemental services to children in these institutions.

Appendix A provides a list of categories that appear on the District Set-Asides page in GMAP. Apart from the Homeless and Neglected categories, the set-aside categories in Appendix A are optional for districts. For details about all set-aside categories, visit the “Help for Current Page” tab on the “District Set-Asides” page in GMAP.

Guidance on Reserving Funds

Districts need to be mindful when taking optional set-asides, whether these funds will be used primarily by the central office, used to fund a districtwide activity or for some other purpose. Although it may be convenient to make purchases and hire personnel for Title I schools from the district level, convenience should not take precedence over other significant concerns. Some important considerations when reserving funds in these categories have to do with: 1) The intent of Title I to be a school-based program; 2) School-based decision-making council requirements; 3) Rank-and-serve requirements; and 4) Whether the district set-aside is reasonable, allocable, necessary and documented.

Title I as a School-Based Program

Title I is designed to be a school-based program, meaning that the program (whether schoolwide or targeted assistance) is administered and implemented at the school level. Educators in Kentucky schools engage in several school improvement activities, including:

- School staff consult with stakeholders to conduct a needs assessment at the school, which involves analyzing data, determining and prioritizing needs;
- School staff use the results of the needs assessment to determine goals and the strategies that will help the school reach the goals;
- School leaders oversee the implementation of the strategies and monitor progress of the implementation; and
- School staff determine whether goals were met and evaluate the success of the strategies.

The school staff are immersed in the daily work at the school and are in the best position to assess needs, determine priorities and goals and fund those strategies that will have the greatest impact on improving student achievement. To implement this school improvement work effectively, schools must receive sufficient funding. Since reserving funds at the district level decreases the amount of funds available to be allocated to schools, districts should be sure optional set-asides are reasonable and necessary.

Districts are required to develop their plans in their Title I applications – including any district set-asides – with timely and meaningful consultation with teachers, principals, other school leaders, paraprofessionals, specialized instructional support personnel, administrators (including administrators of Title I Parts C and D programs), other appropriate school personnel and with parents of children in schools served under Title I, Part A ([ESSA Section 1112 \(a\)\(1\)\(A\)](#)).

The Role of the School-Based Decision-Making (SBDM) Council

The placement of the Title I program at the school level aligns well with the role of the SBDM in identifying school and student needs via the needs assessment. School councils were established as part of the Kentucky Education Reform Act in 1990 and their authority was revised by Senate Bill 1 in 2022. School councils promote shared leadership among those who are close to the students. Voting membership of each council includes parents, teachers and an administrator of the school. The council has the responsibility to set school policy that shall be consistent with district board policy and make decisions outlined in statute, which should provide an environment to enhance student achievement and meet goals established by statute, as well as goals for the district established by the board.

Sometimes school districts reserve Title I funds at the district level to hire staff, which can be an allowable set-aside. For example, funds may be set aside to pay the salary of staff to partially oversee parent and family engagement activities in the district or provide services for EL students and families. Title I funds could be used to pay the salary of the Title I coordinator (or part of the FTE) and/or finance clerk or secretary to perform Title I processing. Hiring staff at the district level becomes more complicated when funds are set aside to hire personnel (such as instructional coaches) who provide services to schools. If the district assigns the staff member to a specific Title I school, it becomes unclear whether the consultation process for personnel decisions described in [KRS 160.345\(2\)\(h\)](#) has been followed. To help ensure compliance with state law of all GMAP applications received, KDE will not approve funds set aside at the district level to hire full-time staff for individual Title I schools. Instead, those funds will need to be allocated to the schools following the rank and serve rules as well as [KRS 160.345\(2\)\(h\)](#).

However, there may be cases in which the district could hire staff to work with Title I schools. If the district hires personnel (e.g., instructional coaches) all the positions would have to be itinerant, with their time split between schools. None of the personnel may be assigned to a specific Title I school. Additionally, the district should make sure that the staff will be meeting needs identified on the schools' needs assessments. Also, the use of funds for personnel must not break rank and serve rules.

The local superintendent has the authority to determine which curriculum, textbooks, instructional materials and student support services will be provided in each school after consulting with the local board of education, the school principal, and the school council and after a reasonable review and response period for stakeholders in accordance with the local board of education policy ([KRS 160.345\(2\)\(g\)](#)). Statute does not prohibit a district from reserving funds to pay for items such as textbooks, instructional materials and student support services for schools. However, KDE eliminated the "other" set-aside category where expenses like instructional materials could have been budgeted in GMAP for a few important reasons. First, depending on how these items are distributed to schools, there is a danger that supplement not supplant

violations could occur in districts that must meet those requirements for Title I, Part A. Also, rank and serve requirements could be violated. Third, it is more difficult to track the funds if purchases are made at the district level and then distributed to schools. To help ensure compliance with federal law of all GMAP applications received, KDE will require most purchases of instructional resources with Title I funds, including computer software, to be made at the school rather than the district level. Therefore, in general, funds should not be set aside at the district level for instructional resources and software and, instead, should be allocated to the schools.

Subject to available resources, the local board shall allocate an appropriation to each school that is adequate to meet the school's needs related to instructional materials and school-based student support services, as determined by the school principal after consultation with the school council. School councils must consult with the school media librarian about the purchase of instructional materials, information technology and equipment ([KRS 160.345\(2\)\(g\)](#)). Purchases of technology hardware with Title I, Part A funds will generally need to be made at the school level. KDE may still approve a technology purchase at the district level after considering evidence that:

1. The technology and the amount of funds are reasonable, allowable, necessary and documented;
2. SBDM minutes document that consultation occurred with the school media librarian, a demonstrated need for the technology and the approval of the amount of funds designated for this purpose by the principal after consultation with the school council; and
3. The distribution of the technology hardware to Title I school(s) does not break rank and serve requirements.

Federal Rank-and-Serve Requirements

In general, rank and serve rules ensure schools with higher rates of students from poverty are prioritized for Title I funding over schools with lower rates of students from poverty. Districts must serve all schools with 75% or higher low-income in rank order of poverty. The district may then continue serving with either Grade Span Ranking or overall District Ranking with any remaining Title I funds ([ESSA Section 1113](#)).

Rank and serve rules could be broken if districts reserve funds to pay for goods or services and then distribute the goods and services to Title I schools. The addition of the cost of the good or service will increase the total allocation of the recipient school. If the recipient school has a lower poverty rate and the cost of the additional good or service raises its total allocation above that of a Title I school with a higher poverty rate, rank and serve rules are broken.

If KDE staff determine that a particular district set-aside will break rank and serve rules, the district will be required to allocate the set-aside in accordance with [ESSA Section 1113](#).

Reasonable, Allocable, Necessary, Documented ([2 CFR 200.403](#), [2 CFR 200.404](#), [2 CFR 200.405](#))

Approval of a Title I application signifies the activities and budgeted amounts meet federal and KDE requirements and the district may begin to implement the activities in the approved application. KDE cannot approve funds for activities that are not defined or are vague. This is one reason why narratives are required in

GMAP to explain the purpose of the funds and identify the school(s) that will be using the funds. Furthermore, funds may never be reserved in any category as “rainy day funds” to use later as needed. All funds must be budgeted for clear, defined purposes that KDE approves. In addition, like all proposed expenditures, optional district set-asides must be:

- **Reasonable:** The proposed goods and services are not excessive in cost and are based on prudent and sound purchasing practices.
- **Necessary:** The goods and services are essential for carrying out the Title I, Part A program. The need for the goods and services is supported in the needs assessment and CDIP/CSIP.
- **Allocable:** The goods and services are specifically for the benefit of Title I schools and meet the program’s intent to provide children significant opportunity to receive a fair, equitable and high-quality education and to close educational achievement gaps.
- **Documented:** The district must be able to readily document the reasonableness, necessity and allocability of the set-aside through an established allowability procedure, needs assessment, standard purchasing processes or district policy.

KDE Expectations for District Set-Asides

Below is a summary of the general expectations outlined in this guidance document. This is not an all-inclusive list but addresses some of the main areas to remember:

- Be sure that stakeholders have input on the Title I plan and proposed use of the Title I funds, including the set-aside ([ESSA Section 1112\(a\)\(1\)\(A\)](#)).
- Most of the funds need to be allocated to schools.
- Only Title I schools may be served with the district set-aside, except for homeless students and students in neglected institutions (if there is an institution in the district).
- Most technology hardware purchases should be made at the school rather than the district level. If technology hardware is being purchased at the district level, please be prepared to supply to KDE, upon request, a copy of SBDM minutes from each school showing the hardware purchase and the amount of funds were approved by the principal after consultation with the school council.
- Most purchases of materials and resources, including software, should be made at the school level. If purchased at the district level for distribution to schools, please be prepared to supply to KDE, upon request, a copy of SBDM minutes from each school showing the purchase and the amount of Title I, Part A funds were approved by the principal after consultation with the school council.
- Personnel should be hired at the school level unless staff hired at the district level will be serving more than one Title I school and will not be assigned to a particular school. The district should ensure that district-wide staff meet the needs identified on the schools’ needs assessments.
- Funds may not be reserved in any category for purposes of “rainy day funds” to use later as needed. All funds must be budgeted for clear, defined purposes that KDE approves.

Consider these guiding questions when reserving funds at the district level:

- What is the percentage of the total allocation being reserved at the district level? Is the percentage a reasonable amount?

- Which schools and staff will receive the goods and services or participate in the activity being paid for with the reserved funds?
- Has the district clearly explained why the funds are being reserved at the district level rather than being allocated to the schools? Does the explanation provide sufficient detail? Is the reason legitimate and justified, or could the funds be used for the same purpose if they were allocated to the schools?
- Will reserving funds at the district level interfere with rank and serve requirements? If the answer to this question is yes, the funds must be allocated to the schools rather than set aside at the district level.
- Are the proposed services/materials/staff identified as a need on the needs assessments of the recipient schools?
- Did the district consult with stakeholders about this set-aside as part of the required Title I Part A consultation process? If so, what was the process and who gave feedback? What documentation supports this?

If KDE staff have a question about a district set-aside, they may ask for additional supporting evidence and documentation. This could include:

- A copy of the SBDM minutes from the school(s) showing that the principal approved the purchase (e.g., technology, instructional materials) and the amount being spent after consultation with the school council.
- Evidence of the required stakeholder input on the Title I plan and district set-asides.
- A detailed budget to further break down the set-aside. For example, if the district sets aside a large amount for Professional Development, KDE staff may ask the district to submit the breakdown, including a narrative and MUNIS codes with specific amounts of funds.

Based on answers to the guiding questions and evidence (such as budgets and school needs assessments), KDE will make a determination about the set-aside. If the set-aside is disallowed, KDE will require the district to re-allocate all or part of the funds before the application will be approved.

Conclusion

In this day and time of increased accountability, agencies and organizations that serve the public are held to high standards. This document provides guidance on Title I district set-asides that is intended to help districts increase transparency and comply fully with state and federal requirements. Should you have any questions about this guidance, please call the Division of School and Program Improvement at the Kentucky Department of Education by telephone at (502) 564-3791.

District Set-Aside Categories in GMAP

- Foster Care
- Homeless
- McKinney-Vento
- Locally Operated Neglected Institutions
- Locally Operated Delinquent Institutions
- Parent and Family Engagement

- Professional Development
- School Extension Program(s)
- Preschool Program(s)
- English Language Learners
- Assessments
- Administrative Costs
- Substitute Salaries
- Sick Pay for Retiring Title I Funded Staff
- Variations in Personnel Costs
- Other District Set-Asides (Available on FY2017 – FY2021 applications)

GLOSSARY OF TERMS AND ACRONYMS

125% Rule — A school or school attendance area whose student population is below 35% poverty still may be eligible for Title I funds. If using this rule, the district divides its total allocation per low-income child by the number of low-income children in the district. Then multiply this per-child amount by 125%. When applying this rule, the district completes this calculation *before* reserving any funds.

35% Rule — A school or school attendance area whose student population is at least 35% poverty is eligible for Title I funds. School attendance areas must be served in rank-order.

75% Rule — A school or school attendance area whose student population is at or above 75% poverty must be served in rank-order first when building eligibility of per-child amount allocations.

Community Eligibility Provision (CEP) — Section 104(a) of the Healthy, Hunger Free Kids Act of 2010 amended the National School Lunch Act to provide an alternative to household eligibility applications for free and reduced-price meals in high poverty districts and schools. This alternative is referred to as the Community Eligibility Provision (CEP). The overall purpose of the CEP is to improve access to nutritious meals for students in high-poverty areas by providing meals to all students “at no cost” to the students. Visit KDE’s [Title I, Part A and Community Eligibility Provision](#) webpage to learn more.

Comprehensive Improvement Planning – School/district improvement efforts focus on student needs through a collaborative process involving all stakeholders to establish and address priority needs, district funding and closing achievement gaps between identified subgroups of students. To learn more and view tools for building an effective Comprehensive School Improvement Plan (CSIP) and Comprehensive District Improvement Plan (CDIP), visit KDE’s [Comprehensive Improvement Planning for Schools and Districts](#) webpage.

Digital Learning – "Digital learning" is defined by ESSA as: "Any instructional practice that effectively uses technology to strengthen a student's learning experience and encompasses a wide spectrum of tools and practices, including blended learning, which occurs under direct instructor supervision at a school or other location away from home and, at least in part, through online delivery of instruction with some element of student control over time, place, path or pace, [as well as] access to online course opportunities for students in rural or remote areas." [20 USC 7112\(3\)](#).

Distance Learning – "Distance learning" generally is understood to refer to situations in which the student learns remotely – that is, the student and instructor are in different locations. It may incorporate both online and offline options, such as instruction via conventional phone calls or dropping off assignments at a student’s home and then following up with a phone call. Or it may consist solely of low-tech options.

Elementary and Secondary Education Act (ESEA) – ESEA, which was first enacted in 1965, is the principal federal law affecting K-12 education. *The Every Student Succeeds Act* is the most recent reauthorization of the ESEA.

English Learner (EL) – The term English learner, when used with respect to an individual, means an individual:

- Who is age 3 through 21;
- Who is enrolled or preparing to enroll in an elementary school or secondary school;
- Who was not born in the United States or whose native language is a language other than English;
 - Who is a Native American or Alaska Native, or a native resident of the outlying areas; AND

- Who comes from an environment where a language other than English has had a significant impact on the individual's level of English language proficiency; or
- Who is migratory, whose native language is a language other than English, and who comes from an environment where a language other than English is dominant; AND
- Whose difficulties in speaking, reading, writing or understanding the English language may be sufficient to deny the individual:
 - The ability to meet the state's proficient level of achievement on state assessments;
 - The ability to successfully achieve in classrooms where the language of instruction is English; or
 - The opportunity to participate fully in society.

The term English Learner replaced the terms *Limited English Proficient (LEP)* and *English Language Learner (ELL)*. LEP is sometimes still used to describe parents with limited English proficiency. Visit KDE's [Title III English Learner and Immigrant Students](#) webpage for additional information and resources.

Evidence-Based – As defined by ESSA, “evidence-based” refers to an activity, strategy or intervention that:

- Demonstrates a statistically significant effect on improving student outcomes or other relevant outcomes based on:
 - 1) Strong evidence from at least one well-designed and well-implemented experimental study; 2) Moderate evidence from at least one well-implemented and quasi-experimental study; or 3) Promising evidence from at least one well-designed and well-implemented correlational study with statistical controls for selection bias.
- Demonstrates a rationale based on high-quality research findings or positive evaluation that such activity, strategy or intervention is likely to improve student outcomes or other relevant outcomes.
- Includes ongoing efforts to examine the effects of such activity, strategy or intervention.

For more information on evidence-based practices, visit KDE's [Evidence-based Practices](#) webpage.

Family Literacy Services – Services provided to participants on a voluntary basis that are of sufficient intensity in terms of hours, and of sufficient duration, to make sustainable changes in a family, and that integrate all of the following activities:

- Interactive literacy activities between parents and their children.
- Training for parents regarding how to be the primary teacher for their children and full partners in the education of their children.
- Parent literacy training that leads to economic self-sufficiency.
- An age-appropriate education to prepare children for success in school and life experiences.

Fiscal Year (FY) – The period of time between July 1 and June 30 of any given year.

Grade Span – When an LEA opts to serve schools below 75% poverty, the LEA may choose to serve particular grade spans (such as K-5 or K-8) as long as the grade span is served in rank order.

Grant Management and Application Planning (GMAP) – The system used by Kentucky districts to maximize the use of their grant dollars from federal non-competitive programs. GMAP allows districts to apply for and manage grant applications. GMAP also provides monitoring, approval and reporting functionality for KDE staff.

High Poverty School – School in the top quartile of poverty (75% or above).

Hold Harmless – Hold harmless provisions guarantee each district eligible for Title I funds a certain percentage of the amount received in the previous year: 95 percent of the prior year's funding in districts where Title I-eligible children make up at least 30 percent of enrollment, 90 percent if they are between 15

and 30 percent and 85 percent for lower-poverty districts.

Local Education Agency (LEA) – A public board of education or other public authority legally constituted within a state for either administrative control or direction of, or to perform a service function for, public elementary schools or secondary schools in a city, county, township, school district or other political subdivision of a state, or of/for a combination of school districts or counties that is recognized in a state as an administrative agency for its public elementary schools or secondary schools. In short, an LEA is the term used for a school district.

Needs Assessment – (Also referred to as a **comprehensive needs assessment**) The epicenter of the improvement plan from which all else revolves. The needs assessment should include rationale of why particular measures are chosen and provide a basis for the strategies and activities that will yield results. This document provides evidence (data, diagnostics, etc.) of the current state of the school/district as well as the determination of the desired state, and the ultimate improvement goals of the school/district. Purchases made with Title I, Part A funds should relate directly to the needs assessment. Additional information on the needs assessment is available on the [Comprehensive Improvement Planning for Schools and Districts](#) webpage.

Non-Public (NP) – Non-public schools include both private schools and homeschools. More information and resources can be found on KDE’s [Non-Public Schools](#) webpage.

Paraeducator – (Also referred to as a **paraprofessional**) A classified employee, under the direct supervision of a teacher. The paraeducator may be assigned to:

- Provide one-on-one tutoring for eligible students, if the tutoring is scheduled at a time when a student would not otherwise receive instruction from a teacher.
- Assist with classroom management, such as organizing instructional and other materials.
- Provide assistance in a computer laboratory.
- Conduct parent and family engagement activities.
- Provide support in a library or media center.
- Act as a translator.

Parent and Family Engagement – The participation of parents in regular, two-way and meaningful communication involving student academic learning and other school activities that includes ensuring:

- Parents play an integral role in assisting their child's learning;
- Parents are encouraged to be actively involved in their child's education at school;
- Parents are full partners in their child's education and are included, as appropriate, in decision-making and on advisory committees to assist in the education of their child; and
- The carrying out of other parent engagement activities.

Per Pupil Amount (PPA) – The PPA determines the amount of funds generated by a school based on the number of low-income children. According to USED’s [non-regulatory guidance on the allocation of Title I funds](#), “In determining what per-child amount to allocate, the LEA should bear in mind the purpose of such funding – to enable children who are most at risk of not meeting the state’s challenging student academic achievement standards. The per-child allocation amount must be large enough to provide a reasonable assurance that a school can operate a Title I program of sufficient quality to achieve that purpose.

Professional Development (PD) – ESSA 8101(42) defines professional development as activities that are an integral part of school and LEA strategies for providing educators (including teachers, principals, other school leaders, specialized instructional support personnel, paraprofessionals and, as applicable, early childhood

educators) with the knowledge and skills necessary to enable students to succeed in a well-rounded education and to meet the challenging state academic standards. Professional development is integral to a school strategy, part of a sustained program or continuum of service, and not as “stand-alone, 1-day or short-term workshops.” Professional development includes, but is not limited to, activities that:

- Improve and increase teachers’ knowledge of academic subjects.
- Are an integral part of broad school-wide and district-wide educational improvement plans;
- Give teachers and principals the knowledge and skills to help students meet challenging state academic standards;
- Improve classroom management skills;
- Are sustained, intensive and classroom-focused and are not one-day or short-term workshops;
- Advance teacher understanding of effective instruction strategies that are based on scientifically based research; and
- Are developed with extensive participation of teachers, principals, parents and administrators.

School Attendance Area – The geographic area in which the children who are normally served by that school reside.

State Educational Agency (SEA) – The agency primarily responsible for the state supervision of public elementary schools and secondary schools (i.e., [Kentucky Department of Education](#)).

Title I, Part A – Title I, Part A provides assistance to improve the teaching and learning of children in high-poverty schools to enable those children to meet challenging state academic content and performance standards.

Virtual school — ED defines "virtual school" to mean: "A public school that offers only virtual courses: instruction in which children and teachers are separated by time and/or location. In addition, interaction occurs via computers and/or telecommunications technologies, and the school generally does not have a physical facility that allows children to attend classes onsite." *Dear Colleague Letter*, [68 IDELR 108](#) (OSERS/OSEP 2016).

Well-Rounded Education – ESSA 8101(52) defines well-rounded education as courses, activities and programming in subjects such as English, reading or language arts, writing, science, technology, engineering, mathematics, foreign languages, civics and government, economics, arts, history, geography, computer science, music, career and technical education, health, physical education and any other subject, as determined by the SEA or LEA, with the purpose of providing all students access to an enriched curriculum and educational experience.