



Kentucky Department of
EDUCATION

Kentucky Department of Education

Title I, Part A Handbook

Office of Continuous Improvement and Support
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INTRODUCTION TO TITLE I, PART A

Title I, Part A is located in sections 1111-1119 of the Elementary and Secondary Education Act (ESEA) of 1965 as amended by the Every Student Succeeds Act (ESSA) in 2015. Both ESEA and ESSA are commonly used when referencing and citing the statute. The purpose of the Title I, Part A program 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 is one of the largest federal programs supporting elementary and secondary education. Local education agencies (LEAs, also referred to as districts) are responsible for completing the program application and overseeing program implementation in participating schools.

In addition to legal citations for ESEA/ESSA, the following citations are included throughout this handbook:

- **Education Department General Administrative Regulations (EDGAR)** – Located in Title 34 of the Code of Federal Regulations (CFR), EDGAR represents the federal regulations that govern all federal grants awarded by the U.S. Department of Education (USED). Example EDGAR citation: 34 CFR 76.1. All EDGAR citations can be searched on the [Electronic Code of Federal Regulations](#) (eCFR) website.
- **Uniform Grant Guidance (UGG)** – UGG is the uniform administrative requirements, cost principles and audit requirements for federal awards. Example UGG citation: 2 CFR 200.1. All UGG citations can be searched on the eCFR website.
- **Kentucky Administrative Regulation (KAR)** – Administrative regulations represent the rules written by agencies (such as the Kentucky Department of Education (KDE)). Regulations have the force of law because they are adopted under authority granted by statutes and often include penalties for violations. Example KAR citation: 704 KAR 7:090. All KAR citations can be searched on the [Legislative Research Commission](#) (LRC) website.
- **Kentucky Revised Statute (KRS)** – Statutes are laws written and enacted by the legislative branch of our state government. Example KRS citation: KRS 160.345. All KRS citations can be searched on the LRC website.

School Attendance Areas

A district must rank order all its school attendance areas based on the percent of low-income children enrolled in each school. 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 or one school per grade span 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. ESSA 1113(a)(3)(B) includes 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.

Allocations

Title I is a school-based program and the majority of funds a district receives should be allocated to the schools. 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 (PPA) 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 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 PPA page of the Title I, Part A application in the Grant Management Application and Planning (GMAP) system for districts serving schools below 35% poverty.

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\(c\)](#). 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 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. The [Program Documentation webinar](#) provides tips on how to ensure districts and schools maintain evidence that effectively demonstrates program compliance.

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

Title I District Coordinator Support

KDE staff working in the Office of Continuous Improvement and Support's (OCIS) Division of School and Program Improvement (DSPI) provide support and technical assistance related to the Title I, Part A program. Each district has a [KDE program consultant](#) assigned to review the district's Title I application and provide technical assistance.

Tips for New Title I Coordinators

- Bookmark the [KDE Title I, Part A webpage](#) and [USED Title I, Part A webpage](#).
- Review the resources available on KDE's [Title I, Part A Documents and Resources webpage](#). A summary of available resources is available in [Appendix B](#).
- 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.
- Read the accountability data found in the [School Report Card](#) for your district and its schools for the most recent year.
- Visit your Title I schools often. Become familiar with their needs assessments, improvement plans and methods for providing services and family engagement activities.
- Visit any non-public schools that are 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.

- 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).
- Use the Title I Coordinator Year-at-a-Glance timeline in [Appendix A](#) as guidance for your program throughout the school year.
- Review the [Data Standards for Title I Data Entry](#) to ensure the Title I status of all schools is correctly documented in Infinite Campus. This data is used by KDE for federal reporting requirements.

Record Retention and Documenting Program Compliance

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](#). Please note that any documentation related to ongoing litigation must be retained until resolved.

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

The following record keeping tips should be taken into consideration when documenting program compliance:

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. Create a document management system to be used at all participating schools to help ensure that proper documentation is maintained in a uniform format at all participating schools. Establishing a well-organized system will make it easier to locate specific pieces of evidence when needed.
3. Maintain digital copies of documents whenever possible to save space. Consider typing handwritten items (such as meeting minutes) to ensure legibility. Give files and folders titles that make it easy to determine what each item is without having to open it.
4. Ensure all personally identifiable information (PII) has been redacted from all documentation prior to sharing files, submitting documentation for monitoring, etc. [2 CFR 200.303\(e\)](#) requires grantees take reasonable cybersecurity and other measures to safeguard information such as PII.
5. Review the editable templates available in the [Title I, Part A Sample Documents folder](#). The following templates can be customized by districts and schools:
 - Non-Public Schools
 - Letter of Notification and Participation Survey
 - Parent and Family Engagement
 - Notification of Right to Request Teacher Qualifications
 - Parent Notification Regarding Certification and Licensure Status of Teacher
 - Sample School Compact Signature Form
 - Sample Compact Discussion Documentation for Conferences (Elementary)
 - Fiscal management
 - Personnel Activity Report Template
 - Sample Semi-Annual Certification
 - Sample Comparability Report Full-time Equivalency (FTE) Documentation

Title I Committee of Practitioners

The purpose of the Title I Committee of Practitioners (COP) is to review and comment on the rules, regulations and policies related to the KDE's administration of Title I programs (including Title I Parts A, C and D) under the ESEA as amended by the ESSA. COP members are Kentucky residents who have knowledge of and/or demonstrated experience in implementing the provisions of federal law pertaining to Title I. Pursuant to 20 USC 6573, the COP must include the following:

- A majority of members from LEAs;
- Administrators, including administrators of programs described in other parts of Title I;
- Teachers from traditional public schools and charter schools (if any) as well as career and technical educators;
- Principals;
- Parents;
- Local school board members;
- Representatives of private school children;
- Specialized instructional support personnel and paraprofessionals;
- Representatives of authorized public chartering agencies (if any); and
- Charter school leaders (if any).

Additional information on the COP is available on the [Title I Committee of Practitioners webpage](#).

SCHOOLWIDE PROGRAM

The majority of Title I schools in Kentucky operate schoolwide programs. The following material is meant to provide an overview of the authorizing statute and should be used in conjunction with USED's [Supporting School Reform by Leveraging Federal Funds in a Schoolwide Program](#).

Schoolwide Program (SWP) Definition

A school with at least 40% low income is eligible to plan and implement a SWP. A SWP must upgrade the entire educational program in the school in order to raise academic achievement for all students. A SWP is built on schoolwide reform strategies, rather than separate add-on services.

The school is not required to identify particular children for services. All children are to be provided with the opportunity to meet academic expectations. The focus is on the instructional program as a whole instead of particular children.

ESSA 1114(a)(1)(B) permits an LEA to operate a SWP in a school with less than 40% poverty 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. The LEA must receive permission from KDE to operate a SWP in a school with less than 40% poverty. Permission is granted 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. KDE releases information on requesting a waiver to operate a SWP in a school with less than 40% poverty in the Commissioner's Monday Message near the beginning of the school year.

Schoolwide Program Plan Core Components

There are three core components required by statute for effective implementation of a 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. Please refer to the [Comprehensive Improvement Planning and Title I, Part A webinar](#) for information on how Title I, Part A relates to the comprehensive district and school improvement plan process outlined in [703 KAR 5:225](#).

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) requires each school operating a 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\(a\)](#). Each school completes a comprehensive needs assessment as part of the comprehensive improvement planning process each year. The needs assessment is based on the performance of all children in the school toward meeting state academic expectations and identifies priority needs. The identified priority needs must determine how resources are used. Title I funds should be used to support at least one of the needs identified on the comprehensive needs assessment.

34 CFR 200.26(a) states that a school operating a SWP must conduct a comprehensive needs assessment of the entire school that:

- Is based on academic achievement information about all students in the school, including all subgroups under ESSA 1111(c)(2), relative to Kentucky's challenging academic standards under [34 CFR 200.1](#) to –
 - 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).
- 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)).
- 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)).

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. (See ESSA 1114(b)(7).) The required components of a SWP plan are found in ESSA 1114(b) and USED's Supporting School Reform document linked at the beginning of this section. The Comprehensive School Improvement Plan (CSIP) completed by all Kentucky schools serves as the school's SWP and a separate SWP plan is not required. As such, the CSIP should clearly identify the activities and strategies that will be supported with Title I funds to meet the needs identified in the needs assessment. Title I should be listed in the funding column of the CSIP for any applicable activities and strategies and approximate amounts should be provided whenever possible.

ESSA 1114(b) states that an eligible school operating a SWP must develop a comprehensive plan that:

- Is developed during a one-year period.
- Is developed with the involvement of stakeholders (parents, community members and individuals who will carry out the SWP).
- 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.
- Is available to stakeholders, is in an understandable and uniform format, and provided in a language that the parents can understand (where practicable).
- If appropriate and applicable, a 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).
- Is based on a comprehensive needs assessment.
- Includes a description of –
 - The strategies that will be implemented to address school needs and how the strategies will:
 - 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 a SWP can be found in ESSA 1114(b)(7)(A)(iii).

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. The method(s) used to evaluate the effectiveness of strategies and activities are outlined in the CSIP.

34 CFR 200.26(c) states that a school operating a SWP must:

- Regularly evaluate the implementation of, and results achieved by, the SWP, using data from Kentucky's annual assessments and other indicators of academic achievement;
- 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;
- Revise the plan, as necessary, based on the results of the evaluation, to ensure continuous improvement of students in the SWP.

Effective Program Design

The design of a SWP 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 in meeting the [Kentucky Academic Standards](#).

There is no one-size-fits-all program; what works for one school may not work for another and something that previously worked may become less effective as the school's population changes. An effective SWP 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 SWP. If data analysis determined that a certain practice is not effective, the school should discontinue that practice.

Refer to USED's Supporting School Reform document linked at the beginning of this section for more information on SWP program design.

Consolidating Federal, State and Local Funds in a SWP

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 SWP school has the flexibility to consolidate funds from Title I and other federal education programs with state and local funds. (See ESSA 1114(a)(1)(A).)

By consolidating funds in a SWP, 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 SWP, those funds lose their individual identity and the school may use the funds to support any activity of the SWP without regard to which program contributed the specific funds used for a particular activity. Advantages of consolidating funds in a SWP include:

- 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. Schools still must meet requirements relating to health, safety, civil rights, student and parental participation and involvement, services to private school children, comparability of services, maintenance of effort and supplement not supplant. (See ESSA 1114(a)(3)(B).)
- 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. (See ESSA 1114(a)(3)(C).)

Please note that a school operating a SWP 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 SWP school that does not consolidate its Title I or other federal funds. Consolidation, however, affords even greater flexibility, as discussed above. Additional information on the consolidation of funds is available in [Notice Authorizing Schoolwide Programs to Consolidate Federal Education Funds and Exempting Them From Complying With Statutory or Regulatory Provisions of Those Programs](#) (July 2, 2004).

Flexibility of Funds in a Schoolwide Program

A school operating a SWP may use Title I funds for any allowable activity that supports the needs of students in the school as identified through the comprehensive needs assessment and articulated in the schoolwide plan (CSIP). In designing and implementing the SWP, a school must implement strategies that:

- Provide opportunities for all children to meet challenging state academic standards.
- 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.
- Address the needs of all students, but particularly those at risk of not meeting challenging state academic standards.

The school should coordinate Title I funds with other federal, state and local funds to improve student achievement. 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.

The following list provides examples of some of the potential uses of funds available to schools when operating a SWP. Please note that the activities on the list do not represent all allowable uses of Title I, Part A funds in a schoolwide program.

- 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).
- 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.

TARGETED ASSISTANCE SCHOOL PROGRAM

Targeted Assistance School Program (TAS) Definition

ESSA 1115(a) states that LEAs may operate a TAS in schools which are not eligible to operate a SWP or schools in which the LEA chooses not to operate a SWP. Schools operating a TAS must use funds only for programs that provide supplemental services for eligible children identified as having the greatest need for special assistance. The goal of a TAS 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. 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. Districts may also choose to operate a TAS program in a school which meets the requirements for a SWP.

Eligible Children

In general, the eligible population for TAS services includes 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 LEA provides a free public education per ESSA 1115(c)(1)(A). From this population, a TAS 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 on the basis of multiple, educationally related, objective criteria;
- 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 experiencing homeless and attending any school served by the local educational agency.

Selecting Children for Title I Services

Each year the school conducts a comprehensive needs assessment as part of the comprehensive school improvement planning process. This determines the focus areas of the Title I, Part A services. The school must identify students who are failing or most at risk of failing to meet Kentucky's challenging academic standards and have the greatest academic need using educationally related, objective measures. These students are eligible to receive Title I, Part A services in a TAS.

From the list of children eligible for services, 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. The number of students served by the school will depend on the amount of funding available to provide services.

The school must maintain updated lists of students served in TAS, 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.). Please note that the list of students may change throughout the school year.

Serving Participating Students in a TAS Program

ESSA 1115(b)(2) outlines how a school operating a TAS provides services to participating students:

- Use Title I, Part A resources to help participating Title I children meet the academic expectations all children are expected to meet which may include supplemental programs, activities and academic courses necessary to provide a well-rounded education.
- Use effective evidence-based instructional strategies that:
 - 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.
- Coordinate with and support the regular educational program that may include services to assist preschool children's transition to elementary school;
- 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.
- Provide strategies to increase parent and family engagement, such as family literacy services.
- If appropriate and applicable, coordinate and integrate federal, state and local services and programs, such as programs supported under this Act, violence prevention programs, nutrition programs, housing programs, Head Start programs, adult education, career and technical education programs, and comprehensive support and improvement activities or targeted support and improvement opportunities under ESSA 1111(d).

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.

Evaluating the TAS Program

TAS programs should be evaluated for implementation and effectiveness annually, at a minimum. The focus of the evaluation should be the impact the supplemental services had on improving participating children's ability to meet the state's challenging academic standards.

PARENT AND FAMILY ENGAGEMENT

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. This section should be used in conjunction with USED's [Parent and Family Engagement Non-Regulatory Guidance \(Jan. 2025\)](#).

According to [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

ESSA 1116(a)(3)(A) requires 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. Districts may increase the amount reserved at their discretion, but the amount cannot be decreased. At least 90% of the required 1% set-aside for parent and family engagement activities must be distributed to the schools. (See ESSA 1116(a)(3)(C).) 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 set aside funds for this purpose. If the district chooses to reserve parent and family engagement funds, the amount reserved is at the discretion of the district. GMAP automatically calculates the required 1% reservation for all districts on the District Set Aside page. If the district is not required to reserve funds, the amount can be reduced.

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. Districts and schools should solicit input from parents regarding how these funds should be spent. Conducting a needs assessment to determine what resources and services parents need to help their children succeed at school can provide insight into possible uses of funds.

ESSA 1116(a)(3)(D) states that funds reserved by the LEA must be used to carry out 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 required to reserve parent and family engagement funds that are 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. This amount is calculated automatically by GMAP.

Building Capacity for Involvement

The intent and purpose of the Title I, Part A parent and family engagement program is to build capacity for involvement by fostering and increasing two-way communication between schools and parents as well as providing parents the tools and strategies needed to help improve their children's academic achievement. Title I parent and family engagement events should support the intent and purpose of the program. When planning a Title I parent and family engagement event, the guiding question should be, "What knowledge, skills, etc. will parents gain at this event that will help them support their child's academic achievement?" Please note that events which are purely social in nature (dances, parties, carnivals, movie nights, etc.) do not meet the intent of the program and should not be supported with Title I funds.

ESSA 1116(e)(1-5) explains that to ensure effective engagement of parents and 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.

The specific steps the district will take to meet these requirements must be included in the district's parent and family engagement policy. The information and resources available on the Prichard Committee's [Kentucky Collaborative for Families and Schools webpage](#) may provide the school with new ideas for engaging families.

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 to the extent practicable.
- 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, operating both SWP and TAS, are required to include a parent and family engagement component in their plan. ESSA 1114(b)(1)(F) states that the schools operating a SWP must provide strategies to increase parent and family engagement in accordance with ESSA 1116. ESSA 1115(c)(1)(G) 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 a 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

ESSA 1116 includes requirements which must be met at the district level as well as each school receiving Title

I funds.

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. (See ESSA 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 process and any subsequent revisions should be maintained to demonstrate compliance with this requirement. This documentation may include but is not limited to evidence of meetings to review/revise the policy (invitations, sign in sheets, meeting minutes, etc.), parent surveys and evidence of survey result analysis, documents with track changes indicating policy revisions, etc.

The 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 1112 and the process of school review and improvement under ESSA 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 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. (See ESSA 1116(a)(2)(E).)
7. Involve parents in the activities of schools receiving Title I, Part A funds.
8. ESSA 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.

KDE has several resources available to help districts ensure their parent and family engagement policies contain all the required information:

- [Parent and Family Engagement Policy and Compact Frequently Asked Questions](#) – Answers to common questions surrounding policies and compacts as well as instructions on how to use KDE's templates.
- [District Parent and Family Engagement Policy Template](#) – A customizable Word document outlining the policy requirements and providing space for districts to describe how each requirement will be met. Please note that districts are not required to use KDE's policy template.

- [Effective District Parent and Family Engagement Policy Checklist](#) – A list of all district policy requirements as well as some policy best practices.

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. (See ESSA 1116(a)(2)(D).) 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.

Parent feedback can be gathered throughout the year after parent and family engagement activities, conferences and other events, as well as at the end of the year. Although it's not the only way to obtain feedback, many districts and schools utilize parent surveys. Once feedback has been gathered, it should be analyzed and next steps should be identified to address any issues identified in the feedback.

Parents' Right to Know

ESSA 1112(e) outlines several pieces of information that districts and schools are required to share with parents. In some cases, ESSA specifies the manner in which the notification must be provided while others are at the discretion of the district. Common methods of notification include letters, posting on district/school webpages or inclusion in handbooks. KDE recommends making the information available to parents through a variety of methods to better ensure parents receive the information.

Notification of Right to Request Teacher Qualifications

ESSA 1112(e)(1)(A) and [34 CFR 200.61](#) 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

ESSA 1112(e)(1)(B)(ii) requires schools which 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 at the grade level and subject area in which the teacher has been assigned. 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 of specific information regarding testing transparency. There are two separate testing transparency notifications which must be provided in order to meet compliance requirements. The Testing Transparency Resource in the [Title I, Part A Sample Documents folder](#) contains language that can be customized by the district to help meet both requirements.

Testing Transparency in General

ESSA 1112(e)(2)(A) requires the district to notify parents that they may request, and the district will provide, information regarding any state or district policy regarding student participation in any assessment mandated by ESSA 1111(b)(2) and by the state or district, which shall include a policy, procedure or parental right to opt the child out of such assessment, where applicable. Please note that districts in Kentucky are not permitted to honor a parent's request to opt-out of statewide testing. Additional information is available in the [Testing Opt-out Message](#).

This information can be shared with parents through a variety of means, including but not limited to a letter, posting on the district website, inclusion in a student handbook, etc.

Testing Transparency: Additional Information

ESSA 1112(e)(2)(B) states that each LEA must make widely available through public means (including by posting in a clear and easily accessible manner on the LEA website, and where practicable, 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.

ESSA requires this information be posted to the district website in order to demonstrate compliance. Districts may also consider sharing the information through other means to increase the likelihood it is seen by parents and guardians such as posting to the school websites, including in a handbook, sending a letter, etc.

School Level Parent and Family Engagement Requirements

Each school receiving Title I funds is responsible for ensuring the following requirements are met.

Annual Meeting

Schools receiving Title I, Part A funds must hold an annual meeting to share information about the Title I, Part A program with the parents of all participating students. (See ESSA 1116(c)(1).) The meeting should be held at a convenient time and all parents should be invited and encouraged to attend. Although ESSA doesn't specify when the meeting must be held, KDE recommends the beginning of the school year to help establish program expectations and set the tone. Pairing the annual meeting with a highly attended event such as an open

house or back to school event will help ensure a large number of parents receive information about the school's Title I program. During the meeting, the school must explain their participation in the Title I, Part A program, program requirements and the rights of parents to be involved. It may be beneficial to create a presentation or handout that can be shared with parents as well as made available on the school webpage. Consider sharing the following items during the annual meeting:

- **Title I, Part A basics** – What it means to be a Title I school and how the school qualified.
- **Title I, Part A funds** – Share the approximate amount of funds the school receives for both instructional activities and parent and family engagement as well as how the money is spent.
- **Parents' right to know and other documents** – Share information and documents such as the school parent and family engagement policy, school-family compact, testing transparency information, right to request teacher qualifications, etc.
- **Parent participation** – Explain parents' right to be involved in the planning, design and implementation of the school's parent and family engagement program (including how program funds are spent). Consider using a survey to obtain feedback about events and activities parents would like to see during the upcoming school year.
- Any other information to help eliminate barriers to participation and increase parent involvement in their child's education.

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 process and subsequent revisions should be maintained to demonstrate compliance with this requirement. This documentation may include but is not limited to evidence of meetings to review/revise the policy (invitations, sign in sheets, meeting minutes, etc.), parent surveys and evidence of survey result analysis, documents with track changes indicating policy revisions, etc.

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 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.

Please note that merely stating the school will meet these requirements is not sufficient. ESSA specifies that the policy must describe how the school will accomplish each requirement. 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.

KDE has several resources available to help schools ensure their parent and family engagement policies contain all the required information. Please note there are two different policy templates depending on the grades served by the school:

- [Elementary School Parent and Family Engagement Policy Template](#) – A customizable Word document outlining the policy requirements and providing space for elementary schools to describe how each requirement will be met.
- [Secondary School Parent and Family Engagement Policy Template](#) – A customizable Word document outlining the policy requirements and providing space for middle and high schools to describe how each requirement will be met.
- [Effective School Parent and Family Engagement Policy Checklist](#) – A list of all school policy requirements as well as some policy best practices.
- [Parent and Family Engagement Policy and Compact Frequently Asked Questions](#) – Answers to common questions surrounding policies and compacts as well as instructions on how to use KDE's templates.

School Compact

Each school receiving Title I, Part A funds will jointly develop with parents a school-parent compact (sometimes called school-family compact or learning 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 ensure regular two-way, meaningful communication between family members and school staff in a language that family members can understand.

The [Effective School-Family Compact Checklist](#) outlines all compact requirements and lists best practices which schools may consider incorporating into the compact. KDE's [School Compact Template](#) can be customized by schools to ensure the document meets ESSA requirements.

School Compact Signatures

KDE requires school-family compacts be signed by all involved parties (school representative, parent/guardian, and student as appropriate) 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.

Discussing the Compact During Parent-Teacher Conferences (Elementary Grades Only)

ESSA 1116(d)(2)(A) requires the compact be discussed during at least one parent-teacher conference at the elementary school level as it relates to the individual child's achievement. The compact serves as an agreement between the school, parent and student as to what each stakeholder will do to ensure the child's academic success. The discussion should be tailored to the achievement of the individual child and how the responsibilities outlined in the compact can help the child improve their achievement. The conference is a good time to check in with everyone to make sure they are carrying out their responsibilities. The compact should have already been provided to and reviewed with parents at an earlier date. Suggested methods for documenting the compact discussion include conference invitations specifying how the compact will be discussed, reminder emails to teachers regarding how to discuss the compact during conferences, checkbox on the sign-in sheet where parents confirm the discussion occurred, etc. Please refer to the School-Family Compact Discussion Document (located in the [Title I, Part A Sample Documents folder](#)) for additional details on documenting this requirement as well as a sample conference sign-in sheet which can be adopted by schools.

SERVICES TO TITLE I ELIGIBLE PRIVATE SCHOOL CHILDREN

ESSA 1117(a) requires public school districts to provide secular, neutral and non-ideological educational services and support to eligible private school students, parents and teachers who would be otherwise eligible for Title I services. These services must be determined in consultation with private school officials. 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 USED guidance:

- [Fiscal Changes and Equitable Services Requirements \(Nov 21, 2016\)](#)
- [Providing Equitable Services to Eligible Private School Children, Teachers and Families \(May 17, 2023\)](#)

Ombudsman

ESSA 1117(a)(3)(B) and 8501(a)(3)(B) establish 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](#). Contact the KDE ombudsman via email: kpsso@education.ky.gov.

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. (See ESSA 1117(b)(1).)
- Participate in the state's [Title I Committee of Practitioners](#) (See ESSA 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.

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. Please note that 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 per ESSA 1117(d).

In ESSA, equitable participation is measured by the amount of funds spent on services for children, teachers and families; the types of services provided; and the timeliness of those services. Low-income private school children living in a participating Title I, Part A attendance area generate funds for services. The children who generate funds for the private school may not be the same students who receive Title I 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 as identified through multiple educationally related criteria. Low-income status is not a criterion used to identify students for services. 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 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 from another program such as Title II or Title IV, an LEA must determine the proportionate amount of Title I funds used to provide services based on the total of funds, including those transferred. This calculation is done automatically in GMAP.

Determining the Proportionate Share

Once an LEA has established the participating public school attendance areas (see B-1 and B-2 of the 2023 Guidance) 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. GMAP automatically calculates the proportionate share of funds for participating private schools. Sample calculation tables are available in the [Fiscal Changes and Equitable Services Requirements Non-Regulatory Guidance](#) (See questions O-2 and O-4).

Control of Funds

Private school officials have no authority to obligate or receive Title I funds. ESSA 1117(d)(1) requires the LEA to maintain control of all Title I funds, materials, equipment and property. All services and activities to be provided using Title I funds must be arranged by the LEA. Private school officials may not arrange for Title I services and activities for students or staff and then submit an invoice to the LEA for reimbursement. Any instructional materials or supplies (computing devices, textbooks, etc.) purchased to provide equitable services to a participating private school are the property of the LEA and the LEA is responsible for safeguarding these items. Some districts may have the items returned to the LEA at the end of the school year while others may store them in a secure location at the private school if the school will be participating the following school year. The LEA is responsible for ensuring that such materials are only used to provide services to participating Title I students.

Carryover

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." Questions B-26 through B-31 of the guidance explain that this provision is meant to ensure private school students, teachers and families receive services "in a timely manner." If the LEA is providing equitable services as required and meeting the obligation of funds requirement of ESSA 1117(a)(4)(B), it generally should not have any, and certainly not significant, carryover. However, there may be unforeseen and unavoidable circumstances that could result in

the carryover of equitable services funds. Any funds carried over to the next school year must still be used for the purpose of providing equitable services to the private school which generated the funds.

Which Schools Must be Contacted?

Every school year (generally in late winter/early spring), an LEA must contact officials from every private school and home 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 notification may be sent via traditional mail or electronically. Common methods of documentation include dated copies of the letters and email read receipts.

This includes private schools located outside the LEA's boundaries. Question C-10 of the 2023 Guidance states that the LEA may not know the whereabouts of all students who reside within its boundaries but attend a private school outside the LEA. In this instance, private school officials may need to notify the LEA about the presence of eligible students.

The district may consider establishing a clear and reasonable deadline for private schools to indicate their intent to participate in the Title I, Part A program for the upcoming school year. (See 2023 Guidance (A-4)).

Timely and Meaningful Consultation

ESSA 1117(b) 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 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."

Consultation Topics

ESSA made substantial changes to the list of required topics that must be covered in a private school consultation. Under ESSA 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 with 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.

LEA officials must ensure that consultation takes place before any decisions are made affecting services to private school children and 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. (See 2023 Guidance A-11.)

Signed Affirmations and the Equitable Services Consultation Form

After the initial consultation, the LEA must submit to the KDE Ombudsman a written affirmation that timely and meaningful consultation has occurred, and that all of the required consultation topics were covered. The written affirmations must be signed by the district Title I coordinator and the officials of each participating private school, confirming 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. (See ESSA 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 sections 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 the GMAP District Document Library, to the KDE Ombudsman.** Please note that the entire completed and signed packet must be uploaded to GMAP, even if the private school is not participating in all programs.

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

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 their 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 they spend providing such oversight. For example, if a person is paid 100% from Title I, Part A funds and spends 10% of their 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 their time administering the equitable services. In this instance, the requirement for charging administrative costs would depend on 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 equity 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 equity 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. If all students cannot be served, students must be ranked and served based on greatest academic need. Similar to the list of eligible students receiving services in a TAS program, the district must maintain updated lists of students served in the private school, 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.). Please note that the list of students may change throughout the school year.

Delivery of Service

The Title I program at the private school should start at the same time as the Title I program for public school participants, meaning generally at or near the beginning of the school year. ESSA does not require specific program designs or delivery methods from school districts regarding servicing private school children. The USED guidance from 2023 notes options which could be provided directly by the public school district or by a third-party contractor. Teachers and paraeducators employed by the LEA to provide equitable services to participating private school students must meet applicable state certification and licensure requirements.

The LEA may employ a private school teacher to provide Title I services to participating students. This must be

outside the time the private school teacher is employed by the private school. For example, if the private school teacher works full-time at the private school, they cannot be employed by the LEA to provide Title I services during the school day (including during a planning period).

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 (ESSA 1117(a)(1)(B) and 2023 guidance C-15).

Resources, Instructional Materials and Supplies

Title I funds may be used to purchase materials and supplies to support the supplemental services provided to participating students. These items must be secular, neutral and non-ideological in nature per ESSA 1117(a)(2). Question C-19 of the 2023 guidance states that simply providing a private school with instructional materials and supplies does not meet the LEA's obligation to provide equitable services. Instructional materials and supplies on their own do not constitute a proper Title I, Part A program nor do they meet the requirement that services be equitable.

Parent and Family Engagement

ESSA 1117(a)(1)(B) states that the district must ensure that teachers and families of the children receiving Title I services participate, on an equitable basis, in services and activities developed pursuant to ESSA 1116. Districts with Title I allocations over \$500,000 must reserve 1% of the proportional share allocated for equitable services to provide engagement activities for the parents and families of participating private school students. This amount is calculated automatically by GMAP.

Activities for parents and families of participating private school students must be planned and implemented after meaningful consultation with private school officials as well as parents and families of participating private school students. Examples of parent and family engagement include:

- Parent meetings;
- Parent-teacher conferences;
- Communication between the Title I teachers and parents on students' academic progress;
- Parent education;
- Parent training activities on how to work at home with children on content and skills;
- Reasonable access to Title I staff to receive information about their child's progress; and
- Private school parent representation on a district-wide private school working group.

Please note that requirements such as the school parent and family engagement policy (ESSA 1116(b)) and the school-family compact (ESSA 1116(d)) are only applicable to public schools served with Title I funds. These documents are **not** required for participating private schools.

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. (See ESSA 1117(a)(1)(A), (b)(1)(D).) For more information on assessing your private school program please consult Question D-1 through D-3 of the 2023 Guidance.

TEACHER AND PARAEDUCATOR QUALIFICATIONS

The phrase “working in a program supported with Title I funds” is used throughout this section and refers to different instructional staff depending on whether the school is operating a SWP or TAS.

- **SWP** – Schoolwide programs are designed to improve the overall instructional program of the school and thereby raise the performance levels of all students; therefore, all teachers and instructional paraeducators working in a SWP are working in a program supported with Title I funds.
- **TAS** – Targeted assistance programs provide support to identified students rather than the school as a whole; therefore, only teachers and instructional paraeducators paid fully or partially with Title I, Part A funds are working in a program supported with Title I funds.

Districts must follow all district policies regarding staff qualifications.

Limited Non-Title I Duties for Title I-Paid Staff

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. The amount of non-Title I duties assigned to Title I staff should be similar to the amount assigned to others in the same position. 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.

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. (See ESSA 1111(g)(2)(J).) Please refer to the parent and family engagement section of this handbook for information on the parent notification which must be provided when students are taught for four consecutive weeks by a teacher that does not meet state certification requirements.

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 KDE’s [Office of Educator Licensure and Effectiveness](#) at KDElicensure@education.ky.gov with questions or for further information.

Paraeducators

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 ESSA 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 working in programs supported with Title I, Part A funds are listed in [34 CFR 200.58](#) and [704 KAR 3:550](#). 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.

Paraeducators 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 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 TAS program, only paraeducators with instructional duties who are paid fully or partially 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.

Visit KDE’s [Paraeducator Requirements in Title I Schools webpage](#) for more information regarding paraeducators at Title I schools in Kentucky.

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. 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 (PD) for Paraeducators

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

Preschool can play a major role in providing high-quality early learning experiences for 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 Children Through Title I, Part A of the Elementary and Secondary Education Act of 1965, as Amended Non-Regulatory Guidance](#), "a Title I preschool program is a program for which an LEA or school uses Title I funds in whole or in part, to improve educational outcomes for eligible children from birth to the age at which the LEA provides a free public elementary education." The program is "designed to prepare eligible children with the prerequisite skills and dispositions for learning that will enable them to benefit from later school experiences." [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 USED's Serving Preschool Children Through Title I Non-Regulatory Guidance and the [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 or on the comparability report. 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 (School Eligibility page), which would not include preschool students. (See ESSA 1113(a)(5)(A).)

Visit KDE's [Early Learning webpage](#) for more information on preschool programs in Kentucky.

Funding Preschool Programs

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% 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 [Early Learning webpage](#). Information on teacher certification is available from the [Kentucky Education Professional Standards Board](#). A district or school is not required to serve preschool students with Title I funds. A district or school may choose to use Title I funds to support a 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. Outside providers can be contracted using Title I funds.

In addition to providing direct preschool services, Title I funds may also be used to support early learning in other ways:

- 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 professional development for the non-Title I preschool program must be coordinated with the Title I elementary school it feeds.

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 \(2015\)](#).

District Operated

A district may reserve a portion of funds to operate Title I preschool programs for eligible children per ESSA 1113(c)(5). 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. 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. If a district opts to use Title I funding for early learning, a strategy must be developed and described in its 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 district may serve preschool children who reside throughout the district and who have been identified as eligible because they are at risk of failing to meet the state's academic achievement standards when they reach school age. A district may not use Title I funds to implement a preschool program throughout the district to benefit all preschool students in the district unless all the schools in the LEA are Title I schools operating schoolwide programs (SWPs). Districts 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 their Title I schools if, for example, a district does not have sufficient Title I funds to operate a preschool program for the district as a whole.

School Operated

Public schools operating schoolwide programs may use funds to establish or enhance preschool programs for children under 6 years of age per ESSA 1114(c)(5). 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. Schools operating SWPs may use Title I funds for preschool activities if those activities support the needs identified in the comprehensive needs assessment and articulated in the schoolwide plan (CSIP). Schools operating TAS programs may only use funds to serve preschool students the school has identified as most at risk of failing to meet challenging state academic standards when they reach school age.

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:

- 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 need 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 meet the state's

challenging academic standards.

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.

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.

Unless state law considers preschool to be a part of elementary education, districts are not required to provide equitable services to preschool children in a private school and preschool children from low-income families do not generate funds for such services. Kentucky does not consider preschool to be a part of elementary education. A district may provide Title I equitable services to preschool students residing in participating Title I public school attendance areas and attending a participating private school at the district's discretion and based on the timely and meaningful consultation between the district and private school officials. In this scenario, factors such as the needs of the preschool children and other eligible children in the private school as well as the amount of funds available to provide services should be taken

into consideration.

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 well-being. 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 play a critical role in 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 ESSA 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

To ensure that all children receive a high-quality education and help close achievement gaps, each district's Title I plan must include a description of how it will support, coordinate and integrate Title I services with early childhood education programs, including plans for the transition of participants to programs at Title I elementary schools (See ESSA 1112(b)(8).) When completing the GMAP application, districts allocating Title I funds to schools that include kindergarten must provide a narrative describing the transition supports and activities provided to students moving from preschool to kindergarten. This includes how the district will coordinate and collaborate with other programs such as Head Start, state-funded preschool, childcare and special education.

TITLE I AND CHILDREN IN FOSTER CARE

The ESEA as amended by 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 and Success for Students in Foster Care](#), developed by USED and U.S. Department of Health and Human Services. For more information and resources on the education of children in foster care, visit KDE's [Foster Care webpage](#).

Definitions

Foster care: The 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, childcare 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.

Requirements

ESSA 1112(c)(5) requires LEAs receiving Title I funds to collaborate with state or local child welfare agencies (CWAs) to:

- Designate a LEA foster care point of contact (POC); and
- Develop and implement clear written procedures governing how transportation to maintain children in foster care in their school of origin when in their best interest will be provided, arranged and funded for the duration of the time in foster care.

Role and Responsibility of the LEA Foster Care Point of Contact

Individuals identified as the [LEA foster care 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 CWA 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 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 CWA 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.

Written Transportation Agreement

The LEA must collaborate with the CWA to develop the written transportation agreement outlining the transportation procedures. The agreement must:

- Ensure that children in foster care needing transportation to the school of origin will promptly receive transportation in a cost-effective manner and in accordance with section 475(4)(A) of the Social Security Act (42 USC 675(4)(A)); and
- Ensure that, if there are additional costs incurred in providing transportation to maintain children in foster care in their schools of origin, the LEA will provide transportation to the school of origin if:
 - The CWA agrees to reimburse the LEA for the cost of such transportation;
 - The LEA agrees to pay for the cost of such transportation; or
 - The LEA and the CWA agree to share the cost of such transportation.

A LEA must ensure that transportation provided for children in foster care is consistent with the procedures developed by the LEA in collaboration with the CWA under ESSA 1112(c)(5)(B). These requirements apply whether or not the LEA already provides transportation for children who are not in foster care. To ensure transportation is provided promptly, the LEA and the CWA must provide or arrange for adequate and appropriate transportation to and from the school of origin while any disputes are being resolved. KDE's [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.

Allowable Uses of Title I, Part A Funds

Students in foster care are not automatically eligible for Title I services, however an LEA may reserve Title I, Part A funds at the district level to implement the following educational stability provisions:

- Paying for “additional” costs incurred in providing transportation to the school of origin for students in foster care.
- Funding the position of the LEA foster care POC. Please note, if the individual serving as POC has job duties other than supporting students in foster care, only their time as POC may be supported with Title I, Part A funds. Time and effort documentation must be maintained in accordance with the LEA’s time and effort procedures and the Time and Effort section of the handbook to ensure the appropriate amount is charged to the program.

At the school level, foster care students are eligible to receive Title I services on the same basis as other students attending a school operating a schoolwide or targeted assistance program.

EDUCATION OF HOMELESS CHILDREN AND YOUTH

The Stewart B. 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 aged 21 and under, consistent with their eligibility for public education services under state and federal law. Under the school nutrition program homeless children are automatically eligible for free meals.

This technical assistance document is intended to provide an overview of the authorizing statute and should be used in conjunction with USED's [Non-Regulatory Guidance for the Education for Homeless Children and Youth Program](#).

Definitions

Homeless children or youth are defined as individuals who lack a fixed, regular and adequate nighttime residence, including:

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 the circumstances described above.

Please note that “children awaiting foster care placement” was removed from the definition of homeless children and youth as of Dec. 10, 2016.

The term **unaccompanied homeless youth** refers to 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.

Purpose of KDE's Homeless Education Program

Homeless children and youth are to be provided services comparable to those received by other students, including 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 English learner students; vocational or technical programs; gifted and talented programs; school nutrition programs; and transportation.

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 by ensuring that they have meaningful participation with positive outcomes.

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](#).

Homeless Liaison

The district must designate an appropriate staff person to serve as the liaison for homeless children and youth (See McKinney-Vento 11432(g)(1)(J)(ii) and [704 KAR 7:090](#)). The liaison may have other duties that include but are not limited to coordinating other federal programs. The NCHE's [brief on the role of homeless education liaisons](#) provides an overview of duties and responsibilities. (See McKinney-Vento 11432(g)(1)(J)(ii) and [704 KAR 7:090](#)). The district must ensure that homeless children and youth are identified by school personnel and through other entities and agencies. 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.

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. The homeless liaison's name should be accurate in [Open House](#). Districts should maintain documentation that the liaison has completed any KDE-required training for the current school year.

The homeless liaison is also responsible for ensuring that school personnel providing McKinney-Vento/homeless services receive professional development and other support related to addressing the challenges of homelessness and supporting homeless children and unaccompanied youth, including runaway youth per 704 KAR 7:090(2)(3)(g) and McKinney-Vento 11432(g)(6)(A)(ix).

McKinney-Vento Grant

The McKinney-Vento Grant is a competitive grant that is awarded on a three-year cycle. The most recent cycle began in October 2024. 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. 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 LEAs will take place during the 2027-2028 school year. KDE will notify districts when the next RFA is posted to the [Competitive Grant Awards webpage](#).

District Requirements

KDE Title I consultants will check to ensure the following homeless education requirements are being met while conducting on-site visits during consolidated monitoring.

Homeless Education Posters

The parent and youth educational rights posters from the National Center for Homeless Education (NCHE) must be on display in the district office and all schools (both Title I and non-Title I). The posters are available in English and Spanish, both of which must be displayed (a total of four posters). The name and contact information for the district and state homeless liaisons must be included on each poster.

In addition to providing the homeless liaison's contact information, displaying the homeless education posters supports compliance with several other McKinney-Vento requirements. The posters contain information regarding support available to homeless children and their families such as the availability of transportation services. Details regarding the right of homeless families and youth to challenge placement and enrollment decisions are also included on the posters.

KDE recommends placing the posters in a conspicuous, high-traffic area (such as the front office) that will ensure visibility for families. The district should consider hanging additional posters throughout the community in places such as shelters, libraries, grocery stores, etc. Districts may download and print posters from the [NCHE Downloads webpage](#).

Policies and Procedures

All districts must adopt and effectively implement a number of policies and procedures related homeless children and youth. Many districts already have policies in place stating that the various requirements will be met. However, oftentimes these policies do not include procedures for implementation. Procedures outline the steps the district will take to ensure the requirements of each policy are met. The procedures and methodologies will likely vary between districts. Evidence that staff have received training on these policies and procedures (training documents, sign in sheets, etc.) can serve as supporting documentation that the policies and procedures are being implemented.

Identification and Enrollment of Homeless Students

LEAs must immediately enroll homeless children and youth even if they have missed application and enrollment deadlines during periods of homelessness. The district must adopt policies and implement procedures to effectively identify homeless children and youth through coordinated activities with staff within the district as well as with other entities and agencies per McKinney-Vento 11432(g)(6)(A)(i). The district must also adopt and implement procedures to effectively identify and eliminate enrollment and attendance barriers to homeless students are automatically enrolled in school and have full and equal opportunity to succeed in the educational setting per McKinney-Vento 11432(g)(6)(A)(ii).

Once enrolled in school, the homeless student has immediate access to participate fully in all school activities and services. Districts must ensure that homeless students 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, if such programs are available.

Identifying Homeless Preschoolers

Local liaisons can identify homeless preschool-aged 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 Individuals with Disabilities Education Act (IDEA) requires that highly mobile children with disabilities, such as migrant children 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.

Awarding Credit, Partial Credit and Diplomas

Homeless youth must receive assistance from counselors to advise them and improve their readiness for college. The district must ensure homeless youth have appropriate access to secondary education including removing barriers that prevent youth from receiving appropriate credit for full or partial coursework completed while attending a prior school.

McKinney-Vento 11432(g)(1)(F)(ii) requires LEAs to have clear procedures in place to award full or partial credit for work completed for homeless students. 704 KAR 7:090 includes specific requirements that Kentucky LEAs must include in the development and implementation of their local procedures ensuring credit, including partial credit, is awarded for all coursework satisfactorily completed by homeless children and unaccompanied youth. Many districts have policies in place stating that credit and partial credit will be awarded but the policies do not include procedures for implementation. KDE's [Awarding Credit and Partial Credit to Homeless Children and Youth Procedures Checklist](#) can assist LEAs in the development of local procedures to ensure the required elements are accounted for and that homeless students are awarded partial and full credits to the extent possible.

Districts must also adopt written procedures for awarding a high school diploma to homeless children and unaccompanied youth who transfer after the completion of the second year of high school and meet the requirements outlined in [KRS 156.160\(1\)\(p\)](#). These procedures may be combined with the procedures for awarding credit and partial credit at the discretion of the district.

Dispute Resolution

Dispute resolution refers to a process or procedures for parents or unaccompanied youth to use to resolve disagreements about the educational placement of a homeless child/youth. McKinney-Vento 11432(g)(3)(E) outlines the process LEAs must follow in the event a dispute arises over student eligibility, school selection or enrollment in a school. The district should have a dispute process which 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. All disputes must be mediated by the district in accordance with the dispute process.

The child or youth must be immediately enrolled in the school in which enrollment is sought, pending final resolution of the dispute, including all available appeals. 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." 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.

Additional information on the dispute resolution is available in KDE's [Kentucky Dispute Resolution Procedure](#) and [Kentucky Homeless Dispute Resolution Sample Form](#).

Records

Records refer to 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.

- The district must assist homeless children and youth in obtaining necessary immunizations or medical records.
- 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.

- 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 previous academic records, medical records, proof of residency or other documentation.
- The district must immediately contact the last school attended to obtain relevant academic and other records.
- 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 (FERPA) of 1974.
- Information about the living situation of a homeless child (e.g., homeless status, temporary address) be treated as a student education record and not be deemed to be directory information.

Transportation

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 (the school the child or youth attended when permanently housed, or the school in which the child or youth was last enrolled, including preschools and feeder schools). 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. 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.

Serving Homeless Students Under Title I, Part A

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.

Title I, Part A Homeless and McKinney-Vento Set-Aside Funds

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 U.S. Department of Agriculture's (USDA) National School Lunch Program and Breakfast Program, public health clinics or local discretionary funds used to provide similar services for economically disadvantaged students generally.

The majority, if not all, of funds reserved for homeless students should be obligated during the year in which they were generated to ensure the funds are spent on the students who generated them. Once the homeless set-aside amount has received KDE approval in GMAP, the amount cannot be reduced.

Homeless Set-Aside

All districts receiving Title I funds must reserve "such funds as may be necessary" (see ESSA 1113(c)(3)(A)(i)) in the homeless set-aside in the Title I GMAP application for homeless students at Title I and non-Title I schools (regardless of receiving a McKinney-Vento Homeless Assistance Grant). Funds must be set aside even if no homeless students in the district are currently identified, in the event

homeless students are identified during the school year. 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.

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 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:

- 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.
- 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 homelessness as well as prohibitions on segregating or stigmatizing homeless students.
- Match or exceed the district's McKinney-Vento subgrant.
- 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) to better estimate the appropriate percentage.

The district may use funds for professional development to heighten staff awareness of the barriers homeless children may encounter. Funds also may be used to provide necessary services to homeless students. The National Center for Homeless Education's [Determining Title I Set Aside document](#) provides additional guidance on the subject.

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.

McKinney-Vento Set-Aside

A district receiving a McKinney-Vento Grant must set aside Title I, Part A funds in the McKinney-Vento set-aside. In addition to the homeless set aside, **grant districts must reserve additional funds for the McKinney-Vento set aside**. The amount must match the amount of funds the district agreed to in its grant proposal. The required McKinney-Vento set-aside amount for each participating district is included on the GMAP Help page.

Title I, Part A Services for Homeless Students

The [National Center for Homeless Education](#) at SERVE provided the following strategies for using Title I, Part A, funds for homeless students. These strategies are suggestions that may be helpful in addressing the needs of homeless students and are taken from an NCHE 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 homeless students (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 homeless students 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 homeless children or high mobility are met.

Please note that funds should be used to address the current needs of homeless students. Using funds to “stock up” on supplies for future homeless students is not a best practice.

Collaboration between Title I, Part A, and the Homeless Education Program

The Title I coordinator and homeless liaison should work together to determine an appropriate amount of funds to be reserved for homeless students. This conversation should include discussion points such as the number of homeless students enrolled during the previous school year, the amount of Title I funds used to provide services for those students and the students' greatest unmet educational needs. This information should be used to select supplemental services to help meet the identified needs of homeless students.

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.

LOCAL INSTITUTIONS FOR NEGLECTED AND DELINQUENT CHILDREN

A district must reserve funds as necessary to provide services comparable to those services provided to children in Title I schools to serve the educational needs of children in identified local institutions for neglected children per ESSA 1113(c)(3)(A)(ii). Funds for service to the institution should be reserved for the district set-aside before funds are allocated to schools. 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.

Definitions

A **neglected institution** is a public or private residential facility, other than a foster home, that is operated for the care of children who have been committed to the institution or voluntarily placed in the institution under applicable state law, due to abandonment, neglect or death of their parents or guardians.

A **delinquent institution** refers to a public or private residential facility for the care of children who have been adjudicated to be delinquent or in need of supervision.

A **community day school program** is a regular program of instruction provided by a state agency at a community day school operated specifically for neglected and delinquent children and youth.

The term **state agency** refers to an agency of state government responsible for providing free public education to children in institutions for children who are neglected or delinquent, in community day programs for children who are neglected or delinquent and in **adult correctional institutions** (facilities in which persons, including those under 21 years of age, are confined as a result of a conviction for a criminal offense). Please note that neither KDE nor a district is the state agency in this definition. The state agency refers to the Department of Juvenile Justice or the Department of Corrections.

Funding Institutions for Neglected and Delinquent Children

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.

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

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. Books and materials cannot be religiously affiliated.

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 Title I, Part A 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 neglected children. KDE may retain the funds if KDE assumes educational responsibility for the 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

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. An EL student may be from any grade, academic proficiency or socioeconomic level in our society. The only characteristics shared by all ELs 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 EL students in ESSA, as well as briefly outline the requirements in serving EL students.

Previously referred to as *Limited English Proficient (LEP)* or *English Language Learners (ELLs)*, 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 ELs' participation in school. Expectations for serving ELs are found in nearly all formula grant programs. Discussions about ELs cannot be limited to Title III alone; Civil Rights laws, Title I and Title III all contain requirements for serving EL students. An understanding of all requirements as well as increased cooperation between programs are necessary for providing effective EL 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 EL 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 were not new additions when ESEA was amended by ESSA; they were moved from Title III to Title I.

Assessment and Accountability Requirements

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

- **English Language Proficiency Standards** – Each state must adopt English language proficiency (ELP) standards that are derived from the four recognized domains of speaking, listening, reading and writing; address the different proficiency levels of ELs; and are aligned with the challenging state academic standards. (See ESSA 1111(b)(1)(F).) As a member of the WIDA consortium, Kentucky adopted the WIDA English Language Development Standards to meet this requirement.
- **English Language Proficiency Assessment** – 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. Please note: This requirement has always been included under Title I, Part A. ESSA removed the identical requirement from Title III. (See ESSA 1111(b)(2)(G).) As a member of the WIDA consortium, Kentucky uses WIDA’s ACCESS for ELLs as the annual ELP assessment.
- **Accountability: English Learner Subgroup** – 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. (See ESSA 1111(c)(4)(A)(ii).)
- **Accountability: Long-Term Goals** – 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. (See ESSA 1111(c)(4)(A)(ii).) Districts receiving Title I funds are now held accountable for this measure rather than only districts receiving Title III funds.
- **Accountability: Annual Meaningful Differentiation** – 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. 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.

Parent Engagement Requirements

ESSA 1112(e)(3) includes several requirements related to the parents of all ELs in the district. Section E of the [Title III Non-Regulatory Guidance](#) contains additional information on engaging the parents of ELs.

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 ELs to provide parents with notification of their child’s identification as an EL 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.

The district has 30 calendar days to identify EL students. For EL students enrolled at the beginning of the school year, this notification must be provided within that 30-day window. For EL students who enroll after the beginning of the school year, the district has 30 days to identify the student as an EL *and* an additional two weeks [14 calendar days] to notify parents of their child's placement in an LIEP.

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 which can be customized by the district and accompanying guidance are available on the [English Learner and Immigrant Resources webpage](#). The notification letter templates are available in English, Spanish, Swahili, Arabic, Somali, Nepali, Kinyarwanda, French, Karen, Bosnian and Japanese.

- 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. Confirmation that all notification requirements are met must be included in the district's GMAP application. This information is included in the EL narrative on the District Set Aside page.

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. Please note, this parent outreach is in addition to the Title I parent and family engagement events and activities to which parents of EL students are already invited to participate. If there are no EL students currently enrolled, the district should still have a plan in place for providing this outreach without delay in the event an EL student enrolls.

A description of the EL parent outreach currently provided by the district (or the plan to provide such outreach) must be included in the district's GMAP application. This information is included in the EL narrative on the District Set Aside page.

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 EL program are district requirements under the civil rights laws.

Coordination with Other Programs

ESSA 1112(c)(4) 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 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 ESEA is part of legislation enacted to ensure that ELs, 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 EL students can apply for a Title III subgrant. 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 EL programs, provide professional development to teachers and school leaders related to meeting the academic and language needs of ELs, and deliver activities that promote EL 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, KDE's [Title III – English Learner and Immigrant Students 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 a TAS program. The school plans to set up a computer lab that will be used by Title I students 50% of the time and used by all students for the remaining 50%. Title I funds may only pay for 50% 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% of the time the lab was used.

[2 CFR 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% 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 cost 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. Please note that written time and effort procedures should outline the specific steps taken in the district to ensure accurate documentation of time and effort. A blanket policy stating that the district will meet all time and effort requirements is not sufficient.

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.”

Time and Effort Procedures

LEAs must develop and implement written time and effort procedures outlining how the requirements for accurate documentation of time and effort will be met. These written procedures should be specific to the LEA and include instructions for meeting the following requirements of 2 CFR 200.430(i):

- The completion of time and attendance reporting;
- The approval cycle that is required;
- The processing of personnel charges to federal awards;
- The internal review process that will be established to ensure the effective internal control over the federal award; and
- The necessary adjustment required so that the final amount charged to the federal award for the salary is accurate, allowable and properly allocated. This justification must occur at least annually.

The time and effort procedures must ensure the following:

1. **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*. 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.
2. **After-the-fact reporting.** Another requirement for time and effort reporting is a process for after-the-fact review of 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 adjustments 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.

PARs and Semi-annual Certifications

Personnel Activity Reports (PARs) and semi-annual certifications are common methods for documenting time and effort. Although not required by the federal government, PARs and semi-annual certifications do offer examples of strong controls that meet time and effort reporting requirements. 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. If a district has not established its own methods for documenting time and effort, then PARs 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.*)

A blank PAR and semi-annual certification are located in the [Title I, Part A Sample Documents folder](#).

Cost Objectives

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 must document, 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% Title I, Part A funds and 50% 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 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 TAS program 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 EL students and is paid with Title III funds, and works part time in a 3rd-grade classroom as supplementary classroom reduction, paid out of Title I. Because the EL 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.

Time and Effort Example

Consider an employee paid 75% from Title I, Part A and 25% from general funds. The employee will document the number of hours worked on each cost objective each day. The PAR must reflect all time worked, not just time spent on Title I, Part A. The employee should not manipulate the time recorded in order to arrive at a specific percentage. At the end of the year, the district should review the PARs from each month, calculating the total time spent on each project and verify that the employee did spend 75% of their time on Title I, Part A. If the district’s calculations reveal the employee did not spend 75% of their time on Title I, Part A the percentage paid from the grant will need to be adjusted accordingly in MUNIS and GMAP.

FISCAL MANAGEMENT

Allowability of Purchases

[2 CFR 200.302\(b\)\(7\)](#) requires non-federal entities (such as districts) maintain written allowability procedures as part of their financial management systems. More than a policy stating the district will ensure purchases are allowable, written procedures should outline the specific steps taken by the district to ensure all purchases made with federal funds are allowable. The [Allowable Cost Checklist and Procedures for Title I, Part A Funds](#) contains information and guiding questions to help districts develop their own procedures to ensure purchases meet the following requirements:

- **Reasonable** – Not excessive in cost and based on prudent and sound purchasing practices (2 CFR 200.404).
- **Allocable** – Cost is incurred specifically for the benefit of the program, distributed proportionately, an allowable activity and meets the program’s intent (2 CFR 200.405).
- **Necessary** – Essential for carrying out the needs-based Title I, Part A program (2 CFR 200.403(a)).

Although the majority of funds are allocated for use by the school, it remains the responsibility of the district to ensure compliance of school expenditures. Districts should be able to document that purchases made with Title I, Part A funds meet the above requirements and address needs identified in the needs assessment, CDIP/CSIP, etc. The most recent non-competitive federal funding matrix is posted on KDE’s [Federal Grants webpage](#). It outlines the budget object codes which can be used in the Title I, Part A application. The fact that the object code is listed as allowable on the funding matrix does not mean expenditures using that object code are automatically allowable and approvable. Use of appropriate object codes, reasonableness, allocability and necessity are all taken into consideration when evaluating the allowability of a purchase.

Preventing Misuse of Taxpayer Funds and Reporting Wrongdoing

To address the misuse of taxpayer funds, ESSA 9203 requires each recipient of a grant or subgrant under the ESEA display, in a public place, the hotline contact information of the Office of the Inspector General (OIG) of the Department of Education. This will allow any individual who observes, detects or suspects improper use of taxpayer funds to easily report such improper use. As grant recipients, districts must also annually notify employees of their responsibility to report fraud. Developing policies and procedures that ensure the [fraud hotline poster](#) is on display in the district office and all Title I schools as well as the annual review of this information with staff will help districts demonstrate compliance. Additional information is available on the [OIG website](#).

[2 CFR 200.113](#) states that applicants, recipients or subrecipients of federal awards must promptly disclose whenever it has credible evidence of the commission of a violation of federal criminal law involving fraud, conflict of interest, bribery, or gratuity violations. The disclosure must be in writing to the federal agency, the agency's Office of Inspector General, and the pass-through entity (KDE), if applicable.

The whistleblower protections of [2 CFR 200.217](#) prohibit an employee of a recipient or subrecipient from being discharged, demoted or otherwise discriminated against as a reprisal for disclosing information that the employee reasonably believes is a misuse of taxpayer funds.

GMAP/Enterprise ERP alignment

[34 CFR 76.700](#) requires districts to comply with the state plan, regulations, statutes and approved application. This compliance includes spending Title I, Part A funds in accordance with the KDE-approved application. The approval of the GMAP application is also an approval to use federal funds on the items outlined in the budget

section of the Title I, Part A application. Revising the application when the district intends to make significant changes allows KDE to review the proposed expenditures and amounts to ensure they meet all allowability requirements and that other requirements, such as rank and serve, are being maintained. Districts must also regularly compare the actual expenditures made in Enterprise ERP (EERP), formerly MUNIS, with the GMAP application budget and address areas of misalignment. KDE recommends the Title I coordinator and district finance officer review GMAP and EERP at least quarterly to ensure alignment between the platforms and timely expenditure of funds.

Timely Expenditure of Funds and Carryover

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%. An 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 ESSA 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. 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](#).

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. Once funds are transferred into Title I, Part A they take on all characteristics and requirements associated with Title I, Part A funds.

Safeguarding Assets

Districts are required to provide effective control over and accountability for all funds, property and other assets per 2 CFR 200.302(b)(4). Assets must be adequately safeguarded to prevent damage, loss or theft and ensure they are used for authorized purposes. Additional information is available in the [Safeguarding Assets Purchased with Title I, Part A Funds document](#).

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. Information on LEA maintenance of effort is available on KDE's [Additional Federal Grant Information webpage](#).

Comparability

ESSA 1118(c) requires districts to 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. Districts demonstrate comparability by submitting the comparability report to KDE annually. Comparability is typically demonstrated by using a student to staff ratio to compare the average number of students per instructional

staff paid with non-federal funds and ensuring the student to staff ratios are comparable at all schools within each grade span and size grouping. Comparability can also be demonstrated using a salary ratio to ensure the per pupil salary expenditures are comparable at all schools.

The window for gathering the student enrollment and instructional staff FTE data for the comparability report is between the last day of the second month of school (a school month is 20 teaching days) and Oct. 31 of the current school year. Often this timeframe will be Sept. 30-Oct. 31, inclusive, but this may depend on district calendars. The comparability report is due on or around Nov. 1 of each year.

KDE has resources such as the [Comparability Report Guide](#) and a [tutorial video](#) available to support districts in completing the comparability report available on the Title I, Part A Documents and Resources webpage. KDE will provide annual reminders for completing the comparability report. Templates districts may use to document the instructional staff FTE for the comparability report are located in the [Title I, Part A Sample Documents folder](#).

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. For districts required to demonstrate that they comply with the requirement, 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.

Please note, some districts are exempt from the supplement, not supplant methodology. Please see the U.S. Department of Education [Supplement Not Supplant Informational document](#) (question 26, p. 20) for information on exemptions. 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.).

KDE has resources such as the [Title I, Part A Supplement Not Supplant Information document](#) and [Example Title I, Part A Supplement Not Supplant Methodology](#) available on the Title I, Part A Documents and Resources webpage. The information document provides an in-depth review of supplement, not supplant requirements and the example methodology serves as a reference as districts work to create their own methodology.

Procurement

LEAs must follow procurement standards in [2 CFR 200.318 through 200.327](#). This includes developing and

implementing written procurement procedures as well as written standards of conduct covering conflicts of interest and governing actions of employees engaged in the selection, award and administration of contracts. These procedures and standards should specify the who, what, when, where, why and how for the district. High level, generic policies that do not contain district-specific information are not sufficient. Be sure to save documentation that the procedures are being followed.

Procurement Procedures

The written procurement procedures developed by the district must address the required topics in 2 CFR 200.318 through 200.327. The following topics must be included in the written procedures:

- Competition
- Methods of procurement to be followed
- Contracting with small and minority businesses, women's business enterprises and labor surplus area firms
- Domestic preferences for procurements
- Procurement of recovered materials
- Contract cost and price
- Federal awarding agency of pass-through entity review
- Bonding requirements
- Contract provisions

Written Standards of Conduct

The district must develop written standards of conduct regarding conflicts of interest and governing actions of its employees engaged in the selection, award and administration of contracts. The standards of conduct must provide for disciplinary actions to be applied for violations.

ESSA WAIVERS OF STATUTORY AND REGULATORY REQUIREMENTS

ESSA 8401 outlines the process which schools, districts and states must follow when requesting a waiver for certain statutory and regulatory requirements from the U.S. Department of Education (USED). Waivers are submitted to USED by the state educational agency (SEA) acting on its own behalf or on behalf of a district or school. Except as outlined in ESSA 8401(b)(4) and ESSA 8401(c), USED may waive any statutory or regulatory requirement of the ESSA. For example, various waivers related to assessment, accountability and reporting requirements were granted to SEAs in relation to the COVID-19 pandemic.

A school wishing to request a waiver must submit its request to the district. The district may submit the waiver to KDE if the district determines the waiver is appropriate. Similarly, a district must submit its waiver request to KDE. According to ESSA 8401(b)(1), the waiver request must include a plan that:

- Identifies the federal programs affected by the requested waiver;
- Describes which federal statutory or regulatory requirements are to be waived;
- Describes how the waiving of such requirements will advance student academic achievement;
- Describes the methods which will be used to monitor and regularly evaluate the effectiveness of the implementation of the plan;
- Includes only information directly related to the waiver request; and
- Describes how schools will continue to provide assistance to the same populations served by programs for which waivers are requested.

If KDE determines a waiver request is appropriate, it will provide the public with notice and reasonable opportunity to comment and provide input on the request. When submitting the request to USED, KDE must also submit the comments and input with a description of how they were addressed. USED will issue a written determination regarding the initial approval or disapproval of a waiver request within 120 days after the submission date. USED's decision to grant a waiver will be published in the Federal Register and a notice will be disseminated to SEAs, interested parties including educators, parents, students, advocacy and civil rights organizations and the public. In the event the waiver request is not approved, the SEA has 60 days to revise and resubmit the waiver.

USED may not grant waivers relating to the requirements outlined in ESSA 8401(c), which include but are not limited to: allocation or distribution of funds; maintenance of effort; comparability of services; use of federal funds to supplement, not supplant, non-federal funds; equitable participation of private school students and teachers; parental participation and involvement; applicable civil rights requirements; and the requirement for a charter school under part C of Title IV.

Per ESSA 8401(d), waivers granted by USED may be for a period of up to four years. USED may extend the period beyond the initial four years if the SEA demonstrates that the waiver has been effective to carry out the activities for which it was requested, has contributed to improved student achievement and the extension is in the public interest. ESSA 8401(f) allows USED to terminate the waiver if a rationale and supporting information have been presented demonstrating the waiver is not contributing to the progress of schools or if it is determined that the waiver is no longer necessary to achieve its original purposes.

During the annual reporting process, SEAs, districts or schools receiving a waiver must describe the progress of schools covered under the provisions of the waiver toward improving student achievement and how the use of the waiver has contributed to such progress.

Information surrounding waivers and other key flexibilities can be found in USED's [ESSA Flexibilities document](#).

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 KDE [Title I consultant](#) assigned to the district.
- Refer to the Kentucky Department of Education’s [Title I webpage](#) for Title I information and resources.
- Watch monthly Title I webinars and read monthly Title I newsletters accessible through the [Title I, Part A 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.
- Regular visits by LEA supervisor to participating private schools and regular communication with private school officials and teachers about student progress and program compliance.
- 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.
- Update Title I coordinator contact information displayed on Open House (using the Person Role Manager web application), as needed.

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 federally funded and non-federally funded staff). Please refer to KDE’s Title I Comparability Guide for additional information surrounding this requirement.
- Review and update student selection criteria sheet and student selection procedure if there are any Targeted Assistance Schools in your district.
- 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.

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.
- 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. KDE recommends posting the documents on the school websites to ensure they can be accessed by parents and the community at any time.
- 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 (due on or around Nov. 1).
- Prepare instructional staff listing and FTE by location and funding source to use for the purpose of the comparability report.
- Determine that all applicable parent notifications (testing transparency, right to request teacher qualifications, etc.) have been provided to parents.
- Consult with participating facilities for neglected and delinquent youth to develop an evaluation of services.
- Ensure Targeted Assistance Schools have notified parents and implemented services.
- Review and update Title I personnel lists for each building.

October

- Ensure the annual Title I meeting has been conducted at each Title I school and that evidence of the meetings (invitations, sign-in sheets, meeting agendas, detailed minutes, information shared with attendees, etc.) has been saved.
- 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 (due on or around Nov. 1).
- 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 at the elementary school level should occur by the end of the month. Ensure the discussion has been adequately documented.

December

- Monitor implementation of schoolwide parent and family engagement activities to ensure they meet the intent and purpose of the Title I parent and family engagement program. As a reminder, entertainment/social activities should not be paid for with Title I funds.
- Ensure that methodology regarding supplement not supplant is on file at the district office, if required for your district. Please note, some districts are exempt from the supplement, not supplant methodology. Please see the [U.S. Department of Education informational document](#) (question 26, p. 20) for information on exemptions.

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 principals of Title I schools 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).

April

- Conduct other stakeholder consultations on the development of the LEA/school Title I plan (i.e., CDIP/CSIP). 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.
- Evaluate the services with local neglected or delinquent facilities, if the district serves one of these facilities. As a reminder, a list of facilities can be accessed by clicking “Help for Current Page” on the District Set-Aside page of the GMAP application. Develop a plan for ongoing consultation for the upcoming school year.
- Consult with the local homeless liaison to determine the number of homeless students and amount to reserve for the required set-aside of Title I funds for the next school year.
- 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. This will help ensure the district will not exceed the 15% carryover limitation.
- Review time and effort documentation for staff paid partially with Title I funds to determine the actual percentage of time spent working on the Title I, Part A program. If the percentage of time does not align with the FTE listed in GMAP, the application should be updated. Similar adjustments must be made in MUNIS to ensure Title I funds are paid for the accurate percentage of the employee’s salary.
- 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.
- Work with Title I schools to review program implementation and effectiveness and plan 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 and school-family compact based on data (e.g., evaluations), jointly with parents, as needed.

APPENDIX B – KDE TITLE I, PART A RESOURCES

This list features some of the KDE-created resources available to districts and schools on the [Title I, Part A Documents and Resources webpage](#). The webpage also includes links to resources from the U.S. Department of Education and other government organizations, such as the National Center for Homeless Education.

KDE always welcomes feedback on its resources. Please contact your [Title I Consultant](#) for more information, to share your thoughts on available resources or to schedule a one-on-one Title I training call.

Budget and Financial Resources

The **allowable cost checklist** and **Title I carryover information** document contain overviews of program requirements in addition to guiding questions to help districts develop their own processes and procedures.

Comparability Report Resources

The **comparability report guide** provides an in-depth look at comparability requirements and step-by-step instructions for completing the report while the **comparability checklist** shows you each item that will be reviewed by KDE upon submission of the report. The **comparability training video** walks you through the completion of the report.

General Resources

The **safeguarding assets** document can help districts develop internal procedures to ensure items purchased with Title I funds are used for authorized purposes. Editable templates and notifications are available in the **Title I, Part A sample documents** zip file. The **new coordinator training webinar and PowerPoint** are particularly useful for new coordinators as they provide an overview of the entire program.

GMAP Resources

The **GMAP training video series** features videos ranging from five to 20 minutes in length that walk you through the completion of each page of the Title I, Part A application in the GMAP system. KDE's **guidance for districts on set-asides** contains an overview of the expectations associated with the GMAP district set-aside page.

Monitoring Resources

The **desk and consolidated monitoring checklists** outline all the indicators that will be evaluated by KDE staff during monitoring, as well as lists required and suggested program documentation. KDE recommends using the checklists to establish a program documentation system to ensure the appropriate items are being saved. The **documentation webinar** provides you with general tips for documenting program compliance, as well as a high-level overview of KDE's monitoring checklists and examples of effective documentation. Establishing a system of documentation helps districts and schools prepare for future monitoring by KDE.

Monthly Title I Resources

The monthly **newsletters**, **webinars** and **accompanying PowerPoints** remain posted on the webpage for one year. Coordinators not currently receiving email notifications regarding webinars and newsletters should ensure they are listed as the Title I coordinator in Person Role Manager.

Parent and Family Engagement Resources

Customize the **policy and compact templates** to fit your needs or use the **policy and compact checklists** to help ensure all required information is included. The **FAQ document** provides basic information about policies and compacts as well as instructions on using the templates.

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.

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\(3\)](#).

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% of the prior year's funding in districts where Title I-eligible children make up at least 30% of enrollment, 90% if they are between 15 and 30% and 85% 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. 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, one-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.

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.