

Archive Information:

This guidance has been formally rescinded by the Department and remains available on the web for historical purposes only.

Although this guidance has been superseded by the amendments made to the Elementary and Secondary Education Act through the Every Student Succeeds Act, this guidance remains in effect through the 2016–2017 school year.

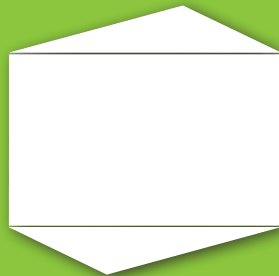


Serving Preschool Children

Through Title I

Part A of the Elementary and
Secondary Education Act of 1965,
as Amended

NON-REGULATORY GUIDANCE



U. S. Department of Education

Serving Preschool Children Through Title I

Part A of the Elementary and Secondary Education
Act of 1965, as Amended

Non-Regulatory Guidance

October 2012



April 16, 2012

Dear Colleague,

I write to share guidance with you and provide clarity regarding how you can use Title I Part A (Title I) funds to implement high-quality preschool programs. I want to thank the state and local education administrators, teachers, and early learning stakeholders who work hard every day to provide high-quality learning to our youngest children, particularly those with high needs. You have shared your concerns and questions with us, seeking clarity and guidance on how you can use Title I funds to implement high-quality preschool programs for eligible children. In developing this guidance, my staff has worked hard to answer the questions you've raised.

Research demonstrates that the years prior to kindergarten are the most significant in shaping a child's foundation for success in school and in life. Without sufficient early learning experiences upon which to build a strong foundation, the achievement gaps -- too often experienced by children with high needs, such as those who are from low-income families, are learning English, or have developmental delays or disabilities -- may start long before children reach kindergarten.

In addition, high-quality preschool programs supported with Title I funds can help ensure that children have the foundation they need to meet early learning and development standards and experience success throughout elementary and secondary school, and beyond.

The U.S. Department of Education is committed to improving the health, social-emotional, and educational outcomes for children from birth through third grade, and high-quality early learning programs are a critical component of our overall reform agenda. A strong P-12 education system can realize a vision for our country in which children reach their full potential, and we achieve President Obama's goal of once again being first in the world in the proportion of college graduates.

Thank you.

A handwritten signature in cursive script that reads "Deborah Delisle".

Deborah Delisle
Assistant Secretary
Office of Elementary and Secondary Education

Contents

Purpose of the Guidance	1
A. General Information	3
A-1. What is a Title I “preschool program”?	3
A-2. May any Title I LEA or school use Title I funds to operate a preschool program?	3
A-3. How may an LEA use Title I funds to support a preschool program?	3
A-4. What is a “school-operated Title I preschool program”?	3
A-5. What is a “districtwide Title I preschool program”?	5
A-6. If an LEA uses Title I funds to support a preschool program, must the LEA describe that program in its Title I plan?	5
B. Eligible Children	6
B-1. Who is considered a preschool-age child?	6
B-2. Who is eligible to participate in a Title I preschool program?	6
B-3. Are some children “automatically eligible” to participate in a Title I preschool program?	7
B-4. What does it mean if a preschool child is “automatically eligible”?	8
B-5. Do all children who are eligible to participate in a Title I preschool program receive services?	8
B-6. Are children with disabilities eligible to participate in a Title I preschool program?	8
B-7. Are migrant children eligible to participate in a Title I preschool program?	9
B-8. Are homeless children eligible to participate in a Title I preschool program?	9
B-9. Are children in a private preschool entitled to receive equitable services under Title I?	9
C. Qualifications of Early Childhood Educators (Teachers and Paraprofessionals) in a Title I Preschool Program	11
C-1. Must teachers working in a Title I preschool program be “highly qualified”?	11
C-2. What qualifications are required for paraprofessionals working in a Title I preschool program?	11

●	C-3. Who qualifies as a paraprofessional in a Title I preschool program? . . .	12
◆	C-4. Do the Title I paraprofessional requirements apply to a paraprofessional working in a preschool program that is jointly funded by Head Start and Title I?	12
●	C-5. What supervision is required of a paraprofessional working in a Title I preschool program?	13
◆	C-6. May Title I funds be used to provide professional development for preschool teachers and paraprofessionals who are not paid with Title I funds?	13
●	D. Parental Involvement and Family Engagement	15
◆	D-1. Do the parental involvement provisions in ESEA section 1118 apply to a Title I preschool program?	15
●	D-2. What is the relationship between the Title I parental involvement policies and those in other programs?	15
◆	D-3. How can a Title I preschool program build capacity for significant parental and family engagement?	15
●	D-4. May a school include parents of children in a Title I preschool program in the school’s professional development activities?	16
◆	D-5. Are Title I funds available to support parental involvement in a Title I preschool program?	16
●	E. Transition from Preschool to Kindergarten	17
◆	E-1. What responsibilities does a schoolwide program school have to assist preschool children in the transition from preschool to elementary school programs?	17
●	E-2. What responsibilities does a Title I targeted assistance program have to assist preschool children in the transition from preschool to elementary school programs?	17
◆	E-3. What responsibilities does an LEA have to assist preschool children in the transition from preschool to elementary school programs?	17
●	F. Coordination with Other Federal Programs	18
◆	F-1. What coordination activities must an LEA carry out with Head Start agencies and other early childhood programs?	18
●	F-2. Must an LEA coordinate its Title I programs with preschool programs?	18
◆	F-3. How may a school or an LEA use Title I funds to complement or extend Head Start, Child Care, State-funded preschool, or other community-based early learning programs for at-risk children?	18

F-4. Must an LEA that operates a Title I preschool program coordinate with services provided by the Migrant Education Program? 19

F-5. May an LEA use School Improvement Grant (SIG) funds to operate a preschool program as part of a school intervention model? 19

F-6. How can a Title I preschool program benefit from the Race to the Top — Early Learning Challenge Program? 20

G. Use of Funds 21

G-1. May an LEA use Title I funds to identify eligible preschool children? 21

G-2. May a Title I school use all of its Title I funds to operate a preschool program? 21

G-3. May a school that receives SIG funds operate a preschool program with those funds? 21

G-4. May an LEA reserve its entire Title I allocation to operate a districtwide Title I preschool program? 22

G-5. May an LEA use Title I funds to expand or enhance other existing public preschool programs? 22

G-6. Do the Title I supplement-not-supplant provisions apply to the use of Title I funds to operate a preschool program? 22

G-7. How does an LEA or school ensure that its use of Title I funds to operate a preschool program is supplemental? 22

G-8. May an LEA or a Title I targeted assistance school use Title I funds in a preschool program if only some of the children are eligible for Title I services? 26

G-9. May an LEA use Title I funds to provide preschool services to eligible children in a Title I targeted assistance school while using non-Federal funds to provide the same services to other children in that school or in the LEA? 26

G-10. Where may an LEA operate a Title I preschool program? 26

G-11. If appropriate facilities are not available to house a preschool program in the LEA, how might Title I funds be used to provide preschool services? 27

G-12. May Title I funds be used to pay the cost of renting a privately owned facility to provide preschool services? 27

G-13. May Title I funds be used for minor remodeling to accommodate a preschool program? 27

G-14. Does Title I require an LEA to test preschool children? 27

G-15. May a portion of Title I funds be used to provide preschool children with comprehensive services? 28

●	H. SEA Support of Title I Preschool Programs	29
◆	H-1. What oversight responsibilities does an SEA have with respect to a Title I preschool program?	29
●	H-2. How can an SEA support Title I preschools?	29
◆	H-3. What achievement standards apply to preschool programs receiving Title I funds?	29
●	H-4. Where can an SEA, LEA, or school find additional resources for supporting high-quality preschool programs?	30
◆	Appendix A: Selected Resources to Support High-Quality Early Learning Programs	31
●	From the U.S. Department of Education	31
◆	From the U.S. Department of Health and Human Services	32
●	From the National Research Council	33
◆	Additional Resources	34
●		
◆		
●		
◆		
●		
◆		
●		
◆		
●		
◆		
●		
◆		
●		
◆		
●		
◆		
●		
◆		
●		
◆		
●		
◆		
●		
◆		
●		
◆		

Purpose of the Guidance

This guidance is written to assist State educational agencies (SEAs), local educational agencies (LEAs), and schools in understanding and implementing preschool programs supported with funds under Title I, Part A (Title I) of the Elementary and Secondary Education Act of 1965, as amended (ESEA). Although each SEA may consider this guidance in the development of its own guidelines and standards, SEAs are free to identify alternative approaches that are consistent with applicable Federal statutes and regulations.

Guidance in this document replaces previous non-regulatory Title I guidance on serving preschool children. It addresses Title I requirements in the ESEA and answers questions raised by SEAs, LEAs, and other officials regarding using Title I funds to serve preschool children. Recipients of Title I funds may refer to this guidance when administering or operating preschool programs supported with Title I funds.

This guidance does not impose any requirements beyond those required under applicable law and regulations. It does not create or confer any rights for or on any person. If you are interested in commenting on this guidance, please e-mail us your comments at OESEGuidanceDocument@ed.gov or write to us at the following address:

U.S. Department of Education
Office of Elementary and Secondary Education
400 Maryland Avenue, S.W.
Washington, D.C. 20202



A. General Information

A-1. What is a Title I “preschool program”?

A Title I preschool program is a preschool program for which an LEA or school uses Title I funds, in whole or in part, to improve cognitive, health, and social-emotional outcomes for eligible children below the grade at which an LEA provides a free public elementary education (ESEA section 1115(b)(1)(A)(ii); 34 C.F.R. § 77.1). Such a 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. See Section B of this document for further information on eligible children.

A-2. May any Title I LEA or school use Title I funds to operate a preschool program?

Yes. Any Title I LEA or school may use Title I funds to operate, in whole or in part, a preschool program consistent with Title I requirements (ESEA section 1112(b)(1)(K)). A Title I LEA or school makes a determination as to whether to use its Title I funds to operate a preschool program based on the needs of its eligible students and the most effective use of those funds. (See G-2 and G-4.) The use of Title I funds for a preschool program is a local decision.

A-3. How may an LEA use Title I funds to support a preschool program?

There are several ways in which an LEA may use its Title I funds to support a preschool program:

- ◆ *School-operated Title I preschool program:* A Title I school may use all or a portion of its Title I funds to operate a preschool program for eligible children. (See A-4 and G-2.)
- ◆ *District-operated Title I preschool program:* An LEA may reserve a portion of funds off the top of its Title I allocation to operate a preschool program for eligible children in the district as a whole or in a portion of the district. (See A-5 and G-4.)
- ◆ *Coordinating with other preschool programs:* An LEA may use Title I funds to coordinate with and support eligible children enrolled in other preschool programs, such as Head Start. (See Section F. and G-5.)

If Title I funds are used in whole or in part to operate a preschool program, all Title I requirements apply to the program.

A-4. What is a “school-operated Title I preschool program”?

A school that receives Title I funds under ESEA section 1113 may use all or a portion of those funds to operate a preschool program for eligible children. (See G-2.) The manner in which a Title I school would operate its preschool program would depend on the type of Title I school — i.e., a schoolwide program school

- ◆ *Targeted assistance program school:* A Title I school that is ineligible to operate, or has chosen not to operate, a schoolwide program may operate a targeted assistance program in which the school provides supplemental educational services to students with the greatest need for assistance — i.e., those identified as failing, or most at risk of failing, to meet the State’s academic achievement standards (ESEA section 1115(b)(1)(B)). Accordingly, if a targeted assistance school operates a preschool program, it may only serve preschool children who reside in its attendance area and whom the school identifies as at risk of failing to meet the State’s academic achievement standards when they reach school age.

A-5. What is a “districtwide Title I preschool program”?

An LEA may reserve a portion of funds off the top of its Title I allocation to operate a preschool program for eligible children. The LEA may serve all eligible children in the district as a whole or those in just a portion of the district. See B-2 for a discussion of children eligible to participate in a districtwide Title I preschool program.

- ◆ *The district as a whole:* An LEA may serve preschool children who reside throughout the LEA and whom the LEA identifies as eligible because they are at risk of failing to meet the State’s academic achievement standards when they reach school age. An LEA may not use Title I funds to implement a districtwide preschool program to benefit all preschool students in the LEA unless all the schools in the LEA are Title I schools operating schoolwide programs.
- ◆ *A portion of the district:* An LEA may serve preschool children who reside in specific Title I school attendance areas. If, for example, an LEA does not have sufficient Title I funds to operate a preschool program for the district as a whole, the LEA may decide to serve only eligible children who reside in Title I participating school attendance areas.

A-6. If an LEA uses Title I funds to support a preschool program, must the LEA describe that program in its Title I plan?

Yes. If an LEA decides to use its Title I funds to support a preschool program, the LEA must describe in its LEA plan how it will do so, whether the program is provided directly by the LEA or through a subcontract with a Head Start agency or a comparable publicly funded early learning program (ESEA section 1112(b)(1) (K)). The LEA must also describe how it will coordinate and integrate preschool services at the LEA or school level, including plans for the transition of children in preschool programs to early elementary school programs (ESEA section 1112(b)(1) (E)(i)).

B. Eligible Children

B-1. Who is considered a preschool-age child?

A preschool-age child is one who is below the grade at which an LEA provides a free public elementary education (ESEA section 1115(b)(1)(A)(ii); 34 C.F.R. § 77.1). For the purpose of Title I, children from birth to the age that the LEA provides a free public elementary education may receive preschool services. In some States, elementary education begins at first grade; in others it begins at kindergarten or before.

B-2. Who is eligible to participate in a Title I preschool program?

In general, eligibility for a Title I preschool program depends on the type of Title I program an LEA or school is operating.

- ◆ Which children are eligible to participate in a Title I preschool program in a school operating a *schoolwide* program?

A preschool that is part of a Title I school operating a schoolwide program (see A-4) is not required to identify particular children as eligible to participate in the Title I preschool. Rather, all preschool-age children residing in the attendance area of the school are eligible to participate in the Title I preschool program (ESEA section 1114(a)(2)(A)(i)). However, if a schoolwide program cannot serve all preschool-age children residing in the school attendance area, it must establish and apply selection criteria to ensure that those children who are most at risk of failing to meet the State's academic achievement standards are served. In this situation, the school must use multiple, educationally related, objective criteria, such as teacher judgment, interviews with parents, and developmentally appropriate measures of child development, to determine those preschool children most in need who will be serviced. The use of family income is one factor that may inform whether a preschool child is most in need, but children should not be identified for services in a Title I preschool program solely on the basis of family income.

- ◆ Which children are eligible to participate in a Title I preschool program in a school operating a *targeted assistance* program?

Preschool-age children residing in the attendance area of a school operating a targeted assistance program (see A-4) who are identified as most at risk of failing to meet the State's academic achievement standards are eligible to participate in a Title I preschool program (ESEA section 1115(b)(1)(B)). To identify eligible preschool children in a targeted assistance school, the school must use multiple, educationally related, objective criteria, such as teacher judgment, interviews with parents, and developmentally appropriate measures of child development. The use of family income as one factor in determining eligibility is allowable, but children should not be identified for a Title I preschool program solely on the basis of family income.

- ◆ Which children are eligible to participate in a districtwide Title I preschool program?
- ◆ An LEA may reserve a portion of funds off the top of the LEA’s Title I allocation to operate a preschool program for eligible children in the district as a whole or in a portion of the district. (See A-5 and G-4.) In general, when an LEA reserves funds to operate a districtwide Title I preschool program, it must select children who are eligible to participate in accordance with ESEA section 1115(b)(1)(B) (targeted assistance program) by identifying preschool children most at risk of failing to meet the State’s academic achievement standards based on multiple, educationally related, objective criteria, such as developmentally appropriate measures of child development, teacher judgment, and interviews with parents. The use of family income as one factor in determining eligibility for a districtwide Title I preschool program is allowable, especially for the purpose of prioritizing when there are not sufficient Title I funds to serve all eligible preschool-age children, but children should not be identified as eligible for a Title I preschool program solely on the basis of family income. An LEA may not use Title I funds to implement a districtwide preschool program to benefit all preschool children in the LEA unless all the schools in the LEA are Title I schools operating schoolwide programs.
- ◆ An LEA may also reserve funds to operate a preschool program for eligible children in a portion of the district — i.e., attendance areas served by some or all of its Title I schools. Under this approach, the LEA would select specific Title I school attendance areas in which to provide preschool programs with Title I funds — e.g., its highest-poverty school attendance areas. Because this approach is based on Title I participating school attendance areas, which children are eligible depends on the nature of the Title I program the school serving the attendance area is operating. Accordingly, all preschool children residing in the attendance area of a school operating a schoolwide program are eligible; in the attendance area of a school operating a targeted assistance program, eligible preschool children would be those who are identified as most at risk of failing to meet the State’s academic achievement standards based on multiple, educationally related, objective criteria, such as developmentally appropriate measures of child development, teacher judgment, and interviews with parents.

B-3. Are some children “automatically eligible” to participate in a Title I preschool program?

Yes. Certain children are “automatically eligible” to participate in a Title I preschool program (ESEA section 1115(b)(2)), including —

- ◆ children who participated in Head Start or a Title I preschool program at any time in the prior two years;
- ◆ children who received services under Part C of Title I (migrant education) in the prior two years;

- ◆ homeless preschool-age children; and
- ◆ children who are in a local institution for neglected or delinquent children and youth or attending a community-day program for these children.

B-4. What does it mean if a preschool child is “automatically eligible”?

If a preschool child is automatically eligible to participate in a Title I preschool program, an LEA or school need not identify the child as most at risk of failing to meet the State’s academic achievement standards. Rather, by virtue of being in one of the categories listed in B-3, a preschool child is deemed to be at risk of failing to meet the State’s academic standards and, therefore, eligible to participate in a Title I preschool program. However, the amount of Title I funds available may not allow an LEA or school to serve all eligible children. (See B-5.)

B-5. Do all children who are eligible to participate in a Title I preschool program receive services?

Not necessarily. Often, the amount of Title I funds available may not permit an LEA or school to serve all eligible preschool children. In that case, consistent with ESEA section 1115, from the universe of eligible children, the LEA or school selects those children who have the greatest need for special assistance to participate in a Title I preschool program. These selections are difficult because they inevitably result in some children being selected before other children who may also have significant needs. An LEA’s or a school’s staff, based on a review of all the information available, should use their best professional judgment in making these selections, often balancing the needs of different populations. An LEA or a school may decide, for example, that a child who is automatically eligible by virtue of being homeless should not be served because he or she scores higher on measures of school readiness than other eligible children. Similarly, an LEA or a school may decide that English Learners have the greatest need for preschool services in order to learn English prior to entering school. This should be reflected in the LEA’s needs assessment and included in its Title I plan.

B-6. Are children with disabilities eligible to participate in a Title I preschool program?

Yes. Children with disabilities are eligible to participate in a Title I preschool program on the same basis as eligible children without disabilities (ESEA section 1115(b)(2)(A)). However, an LEA or school may not use Title I funds to provide services to preschool children with disabilities that they are otherwise required by law to receive because to do so would violate the Title I supplement not supplant requirements (ESEA sections 1114(a)(2)(B), 1120A(b)). (See G-7.)

B-7. Are migrant children eligible to participate in a Title I preschool program?

Yes. Migrant children are eligible to participate in a Title I preschool program on the same basis as eligible non-migrant children (ESEA section 1115(b)(2)(A)). Moreover, preschool children who received services under the migrant education program (Title I, Part C) in the prior two years are automatically eligible to participate in a Title I preschool program (ESEA section 1115(b)(2)(C)). (See B-3 and B-4.)

B-8. Are homeless children eligible to participate in a Title I preschool program?

Yes. Homeless children are automatically eligible to participate in a Title I preschool program (ESEA section 1115(b)(2)(E)). (See B-3 and B-4.) Even though homeless preschool children are automatically eligible to participate in a Title I preschool program, often waiting lists prevent newly homeless families or those that are new to a community from accessing scarce slots in a preschool program. In this event, the local liaison required by the McKinney-Vento Homeless Assistance Act (McKinney-Vento section 722(g)(1)(J)(ii)) can help ensure that homeless children have a full opportunity to enroll in preschool programs. The liaison should work with preschool program staff to remind them how important their services are for homeless children and might encourage them to keep slots open specifically for homeless children.

Homeless children are difficult to identify for many reasons and thus often go unnoticed by school personnel. Preschool-age children who are in homeless situations are even more difficult to identify than those who are school age. These children can sometimes be identified through their school-age siblings who are attending school. LEA liaisons, however, should also reach out to community service agencies, family shelters, and other agencies where homeless families with young children receive services.

For more information, see the *McKinney-Vento Homeless Assistance Act Non-Regulatory Guidance* (Section F) (available at <http://www2.ed.gov/programs/homeless/guidance.pdf>).

B-9. Are children in a private preschool entitled to receive equitable services under Title I?

Not generally. ESEA section 1120 requires an LEA to provide equitable services to eligible elementary and secondary school children. As a result, unless State law considers preschool to be part of elementary education, children in a private preschool are not receiving elementary education and thus are not entitled to receive equitable services under Title I.



- Even though preschool children in a private school are not *entitled* to receive equitable services, such children who reside in a participating Title I school attendance area and attend a private elementary school in which school-age children are entitled to equitable services *may* receive Title I services if, after meaningful consultation with private school officials, the LEA determines that sufficient Title I funds are available to provide such services, considering the needs of other eligible private school children. In essence, preschool children would be served in place of or in addition to other eligible elementary and secondary private school children who are entitled to receive equitable services (ESEA section 1120).



C. Qualifications of Early Childhood Educators (Teachers and Paraprofessionals) in a Title I Preschool Program

C-1. Must teachers working in a Title I preschool program be “highly qualified”?

The requirements in ESEA section 1119 that required all teachers of core academic subjects within a State to be highly qualified not later than the end of the 2005-2006 school year apply only to elementary and secondary school teachers (see the definition of “highly qualified” in ESEA section 9101(23)). Accordingly, only teachers working in a Title I preschool program in a State that considers preschool to be part of public elementary education must meet the Title I requirements for “highly qualified teachers” (ESEA sections 1119, 9101(23); 34 C.F.R. §§ 200.55 and 200.56). However, preschool teachers should meet the highest professional standards for teaching young children, which ideally include having earned a baccalaureate degree and received comprehensive education about child development. Moreover, some preschool teachers are required to meet specific standards. For example, not later than September 30, 2013, at least fifty percent of Head Start teachers nationwide in center-based programs must have (1) a baccalaureate or advanced degree in early childhood education; or (2) a baccalaureate or advanced degree and coursework equivalent to a major relating to early childhood education, with experience teaching preschool-age children (Head Start Act section 648A(a)(2)(A)(i) and (ii)). Well-educated, effective teachers are essential to a high-quality preschool program and the successful development and learning of young children.

C-2. What qualifications are required for paraprofessionals working in a Title I preschool program?

In a Title I preschool program in a targeted assistance school, a paraprofessional paid with Title I funds —

- ◆ must have earned a secondary school diploma or its recognized equivalent; and
- ◆ must have (1) completed at least two years of study at an institution of higher education; (2) obtained an associate’s or higher degree; or (3) met a rigorous standard of quality and have demonstrated — through a formal State or local academic assessment — knowledge of, and the ability to assist in instructing, reading readiness, writing readiness, and mathematics readiness (ESEA section 1119(c)-(d); 34 C.F.R. § 200.58(b)-(d)).

In a Title I preschool program in a schoolwide program school, all paraprofessionals must meet the above requirements, regardless of how their salaries are funded.

● A paraprofessional who is proficient in English and a language other than
◆ English and serves only as a translator to enhance the participation of preschool
● English Learners or who has instructional-support duties that consist solely of
◆ parental involvement activities must have a high school diploma or its recognized
● equivalent but does not have to meet the additional requirements noted above
(ESEA section 1119(e)-(f); 34 C.F.R. § 200.58(b), (e)).

◆ For more information on paraprofessionals, see the *Title I Paraprofessionals Non-Regulatory Guidance* (Mar. 2004) (available at <http://www.ed.gov/policy/elsec/guid/paraguidance.doc>).

◆ **C-3. Who qualifies as a paraprofessional in a Title I preschool program?**

◆ A paraprofessional, for the purpose of meeting staff qualification requirements in a
● Title I preschool program, means an individual who provides instructional support
◆ under the direct supervision of a teacher. Instructional support may include:
● assisting in classroom management, conducting parent involvement activities,
◆ providing instructional support in a library or media center, acting as a translator, or
● providing instructional support services such as helping children practice reading
● readiness, writing readiness, and mathematics readiness skills taught by the teacher
◆ (ESEA section 1119(g)(2)).

● A paraprofessional should not be providing direct instruction or introducing new
◆ content or skills. A paraprofessional does not include an individual who has only
● non-instructional duties, such as providing personal care services or performing
◆ clerical duties (34 C.F.R. §§ 200.58(a)(2) and 200.59).

● **C-4. Do the Title I paraprofessional requirements apply to a paraprofessional working in a preschool program that is jointly funded by Head Start and Title I?**

◆ The Title I paraprofessional requirements apply to a paraprofessional who is
● working in a preschool program in a targeted assistance school and is paid
◆ with Title I funds. So, for example, in a preschool program in a targeted
● assistance school in which Title I funds support the instructional component
◆ and Head Start funds support the remainder of the program activities, the Title
● I paraprofessional requirements would apply because Title I funds would be
◆ paying for the paraprofessionals who support the instructional program. The
● Title I paraprofessional requirements apply to all paraprofessionals, regardless of
◆ funding source, if a jointly funded preschool program is part of a Title I schoolwide
● program (34 C.F.R. § 200.58(a)(3)(i)-(ii)).

C-5. What supervision is required of a paraprofessional working in a Title I preschool program?

A paraprofessional may only provide instructional support and the instructional support may only be provided under the direct supervision of a teacher (ESEA section 1119(g)(3)(A)). A paraprofessional works under the direct supervision of a teacher if the teacher plans the instructional support activities the paraprofessional carries out, the teacher evaluates the achievement of the students with whom the paraprofessional is working, and the paraprofessional works in close and frequent physical proximity to the teacher (34 C.F.R. § 200.59(c)(2)). Instructional support activities include reading with children and helping children practice the skills introduced to them by the teacher.

As a result, a Title I preschool program staffed entirely by paraprofessionals is not permitted. A Title I preschool program in which a paraprofessional provides instructional support and a teacher visits the site once or twice a week but otherwise is not in the classroom or a program in which a paraprofessional works with a group of students in another location while the teacher provides instruction to the rest of the class would also be inconsistent with the requirement that a paraprofessional work in close and frequent proximity to a teacher. For more information, see the *Title I Paraprofessionals Non-Regulatory Guidance* (Mar. 2004) (available at <http://www.ed.gov/policy/elsec/guid/paraguidance.doc>).

A paraprofessional may assume limited duties that are assigned to similar personnel who are not working in a Title I preschool program including non-instructional duties and duties that do not benefit participating students, if the amount of time the paraprofessional spends on those duties is the same proportion of total work time as the time spent by similar personnel at the same school (ESEA section 1119(g)(3)(B); 34 C.F.R. § 200.59(d)).

C-6. May Title I funds be used to provide professional development for preschool teachers and paraprofessionals who are not paid with Title I funds?

Yes, under certain circumstances. Consistent with ESEA section 1119(h) and 34 C.F.R. § 200.60, Title I funds may be used to support ongoing training and professional development to assist teachers and paraprofessionals in satisfying the requirements of Title I. Therefore, Title I funds may be used to provide professional development for any teacher or paraprofessional who works in a Title I preschool program supported, in whole or in part, with Title I funds even if his or her salary is not paid for with Title I funds, so long as the training is related to the Title I preschool program and is designed to meet the educational needs of Title I-eligible children. For example, Title I funds may be used for professional development for Head Start teachers working in a preschool program jointly funded by Title I and Head Start if the training is designed to help the Head Start teachers meet the educational needs of Title I-eligible children.



Under certain conditions, Title I funds may also be used for professional development for non-Title I preschool teachers and paraprofessionals working in programs with no Title I funds, such as Head Start, or for non-Title I teachers and paraprofessionals in a Title I elementary school. For example, Title I funds may be used for such professional development if the children served in a non-Title I preschool are likely to be attending a Title I elementary school when they enter kindergarten, and if the purpose of the professional development is to improve coordination between the non-Title I preschool and the Title I elementary school or to facilitate children's transition from preschool into a Title I elementary school.



D. Parental Involvement and Family Engagement

D-1. Do the parental involvement provisions in ESEA section 1118 apply to a Title I preschool program?

Yes, consistent with the type of preschool program being operated. For example, in the case of a district operating a preschool program, a school would not be required to include parents of preschool children in its school parental involvement policy under ESEA section 1118(b). The LEA, however, would be required to include parents of preschool children in its parental involvement policy under ESEA section 1118(a).

However, a school operating a preschool program would be required to include parents of preschool children in its parental involvement policy under ESEA section 1118(b). With respect to other activities such as the annual meeting requirement or providing training to parents, a school or LEA may include preschool parents, as appropriate, in ongoing activities or provide separate activities for those parents if their needs so warrant.

D-2. What is the relationship between the Title I parental involvement policies and those in other programs?

An LEA or a school operating a Title I preschool program must, to the extent feasible and appropriate, coordinate and integrate Title I parent involvement and family engagement strategies and activities with parent involvement strategies under other programs such as Head Start, State preschool programs, programs funded under the Child Care and Development Fund (CCDF or Child Care), and IDEA programs (ESEA section 1118(a)(2)(D) and (e)(4)).

D-3. How can a Title I preschool program build capacity for significant parental and family engagement?

The quality of the home environment and parent-child interaction is central to a child's education. Parents and other family members strengthen their child's school-related competencies, including literacy and social-emotional development, when they engage in language-rich parent-child interaction, provide support for literacy in the family, and hold appropriate expectations for their child's learning and development. Accordingly, preschool programs can provide families with educational training in those parenting skills most closely associated with children's language, social-emotional, and cognitive development. In addition, preschool programs also can share State early learning and development standards and the preschool curriculum goals with families, and help them understand how to support learning at home that will help children meet these standards and goals.

-
- ◆
-
- ◆
-
- ◆
-
- ◆
-
- ◆

Preschool programs should engage families in supporting their children’s development and learning, such as creating systems for ongoing two-way communication with families (including regular parent-teacher conferences and frequent reports on children’s progress). Programs can also facilitate meaningful access to the program through encouraging parents and families to volunteer in the preschool classroom and providing opportunities for parents to observe and participate in classroom instructional activities. Program staff can encourage parent involvement in decision making and provide parent education in child development, outreach to fathers and other family members, social networks of support, intergenerational activities, linkages with community supports and adult and family literacy programs, and parent leadership development opportunities.

-
- ◆
-
- ◆

Programs can also train and support parents and families to develop a plan to consistently reinforce cognitive and social-emotional skills during the summer or other extended vacation periods, and as children move to preschool and kindergarten, which will help prevent the loss of previously acquired skills.

-
- ◆

D-4. May a school include parents of children in a Title I preschool program in the school’s professional development activities?

-
- ◆
-
- ◆
-
- ◆
-
- ◆

Yes. A Title I school must provide reasonable support for parental involvement activities as parents and families of participating children may request (ESEA section 1118(e)(14)), including allowing parents to participate in professional development activities that the school or LEA deems appropriate. In addition, an LEA must describe in its Title I plan the strategy the LEA will use to coordinate professional development under Title I with professional development programs funded under Title II of the ESEA to provide professional development to principals and teachers and, if appropriate, to other individuals including parents (ESEA section 1112(b)(1)(D)).

-
- ◆

D-5. Are Title I funds available to support parental involvement in a Title I preschool program?

-
- ◆
-
- ◆
-
- ◆
-
- ◆

Yes. An LEA that receives a Title I, Part A allocation of more than \$500,000 in a given fiscal year must reserve not less than one percent for parental involvement activities. Of that amount, it must distribute not less than 95 percent to its Title I schools. Accordingly, an LEA that operates a districtwide Title I preschool program may use the five percent of its reservation that it retains to support parental involvement in its preschool program. Similarly, a Title I school operating a preschool program may use the funds it receives from the LEA’s reservation to support parental involvement of parents of preschool children.

E. Transition from Preschool to Kindergarten

E-1. What responsibilities does a schoolwide program school have to assist preschool children in the transition from preschool to elementary school programs?

A schoolwide program school must assist preschool children in the transition from early learning programs, such as Title I preschool programs, Head Start, IDEA programs, Child Care, State-funded preschool programs, and other preschool programs, to elementary school programs and must include in its comprehensive schoolwide plan a description of how it will assist preschool children in this transition (ESEA section 1114(b)(1)(G); 34 C.F.R. § 200.28(e)).

E-2. What responsibilities does a Title I targeted assistance program have to assist preschool children in the transition from preschool to elementary school programs?

A school operating a targeted assistance program must coordinate with and support the school's regular education program, which may include services to assist preschool children in the transition from early learning programs, such as Title I preschool programs, Head Start, IDEA programs, Child Care, State-funded preschool programs, and other preschool programs, to elementary school programs (ESEA section 1115(c)(1)(D)).

E-3. What responsibilities does an LEA have to assist preschool children in the transition from preschool to elementary school programs?

In its local Title I plan, an LEA must describe how it will coordinate and integrate the services it provides under Title I with other educational services at the LEA or school level, such as Head Start, IDEA programs, Child Care, State-funded preschool programs, and other preschool programs, including plans for the transition of children in those programs to elementary school programs (ESEA section 1112(b)(1)(E)(i)).



F. Coordination with Other Federal Programs

F-1. What coordination activities must an LEA carry out with Head Start agencies and other early childhood programs?

Each LEA receiving Title I funds, regardless of whether it operates a Title I preschool program, must carry out the following coordination activities with Head Start agencies and, if feasible, other early learning programs that serve children who will attend the schools of the LEA (ESEA section 1120B(a)):

- ◆ Developing and implementing a systematic procedure for receiving records of preschool children, with their family’s consent;
- ◆ Establishing communication between school staff and their early learning program counterparts;
- ◆ Conducting meetings involving parents, kindergarten or elementary school teachers, Head Start teachers, or, if appropriate, teachers from other early learning programs to discuss the developmental and other needs of individual children;
- ◆ Organizing and participating in joint transition-related training of school staff, Head Start staff, or, where appropriate, other early learning program staff; and
- ◆ Linking the educational services provided by the LEA with those provided by Head Start programs. (ESEA section 1120B(b)).

F-2. Must an LEA coordinate its Title I programs with preschool programs?

Yes. An LEA’s Title I plan must describe how the LEA will coordinate and integrate services it provides under Title I with other educational services, such as Head Start and other preschool programs (e.g., IDEA-funded preschool programs), including its plans for the transition of children in those programs to elementary school programs (ESEA section 1112(b)(1)(E)(i)). It is particularly important for an LEA to address coordination between any Title I preschool programs that it or its schools operate and other preschool programs that serve children who will attend the LEA’s elementary schools upon reaching school age.

F-3. How may a school or an LEA use Title I funds to complement or extend Head Start, Child Care, State-funded preschool, or other community-based early learning programs for at-risk children?

In addition to supporting preschool children participating in a Title I preschool program, an LEA or school may use Title I funds to complement or extend Head Start programs, Child Care, State-funded preschool programs, or other community-based early learning programs for at-risk children. In the examples listed below, all Title I requirements apply to the use of Title I funds.

- ◆ Eligibility for Head Start is based on the income levels of parents. Children eligible for Title I might not qualify for Head Start under Head Start’s income requirement. If they do not, Title I funds may be used to provide services to Title I-eligible children who are not eligible for Head Start services.
- ◆ Head Start might be unable to serve all eligible children. Title I funds may be used to serve children who are eligible for but not served by Head Start, and are also eligible for Title I. Note that some Head Start-eligible children might not be eligible for Title I because they are not most at risk of failing to meet the State’s standards.
- ◆ Title I funds may be used to provide additional services to Head Start children who are also eligible for Title I services. This may include extending the daily program for an additional amount time, increasing the number of days in the program, increasing the quality of the program, providing services at times Head Start is not operating, or enriching services through the provision of extra personnel to work with Title I-eligible children.
- ◆ Title I funds may provide educational services for children who are eligible for both Title I and Head Start, with Head Start funds providing other services.
- ◆ Title I funds may supplement or expand existing early learning programs, including State-funded preschool, Child Care, and community-based early learning programs for children who are also eligible for Title I services.

F-4. Must an LEA that operates a Title I preschool program coordinate with services provided by the Migrant Education Program?

Yes. An LEA must coordinate and integrate Title I services, including preschool services supported with Title I funds, with services provided at the LEA or school level for migrant children (ESEA section 1112(b)(1)(E)(ii)). Similarly, the Migrant Education Program has a responsibility to coordinate with Title I programs (ESEA section 1304(c)(1)(B)). These requirements for coordination increase program effectiveness, eliminate duplication, and reduce fragmentation of instructional programs provided to preschool migrant children.

F-5. May an LEA use School Improvement Grant (SIG) funds to operate a preschool program as part of a school intervention model?

Yes. Under ESEA section 1003(g), an SEA awards SIG funds on a competitive basis to LEAs primarily to implement one of four school intervention models in schools identified by the SEA as persistently lowest-achieving. In addition to the elements that comprise a particular school intervention model, an LEA may use SIG funds to include other strategies, such as implementing a high-quality preschool program that is designed to improve school readiness for high-need young children. The high-quality preschool program must be carried out in accordance with the LEA’s SIG application.

● For more information regarding the SIG program, see the *Guidance on Fiscal Year 2010 School Improvement Grants under Section 1003(g) of the Elementary and Secondary Education Act of 1965* (Feb. 23, 2011) (available at <http://www2.ed.gov/programs/sif/legislation.html#guidance>).

● **F-6. How can a Title I preschool program benefit from the Race to the Top — Early Learning Challenge Program?**

● A State that receives funding through the Race to the Top—Early Learning Challenge program is charged with improving the quality of early learning and development programs by integrating and aligning resources and policies for early learning and development programs across State agencies and maximizing or having a plan to maximize participation of all publicly funded early learning and development programs, including Title I preschool programs, in the State’s tiered quality rating and improvement system. In addition, the Race to the Top—Early Learning Challenge grantees will serve as models and share best practices from which all States can benefit.



G. Use of Funds

G-1. May an LEA use Title I funds to identify eligible preschool children?

Generally, it is the responsibility of an LEA to use information it already has available to identify children who are failing or most at risk of failing to meet a State's academic achievement standards. However, if an LEA has no appropriate existing data to identify at-risk preschool children, the LEA may use Title I funds to identify these children.

G-2. May a Title I school use all of its Title I funds to operate a preschool program?

Yes. A Title I school may use all of the Title I funds it receives under ESEA section 1113 to operate a preschool program if the school determines that such use of its funds holds the most promise for raising the achievement of its students and the school implements the preschool program consistent with all applicable requirements. Note that a Title I school operating a *targeted assistance program* may only serve children who are most at risk of failing to meet the State's academic achievement standards.

Similarly, a Title I school operating a *schoolwide program* that does not have sufficient funds to serve all preschool children residing in the school attendance area must apply selection criteria to serve those children who are most at risk of failing to meet the State's academic achievement standards. (See B-2.)

Note also that a Title I school using its entire allocation to operate a preschool program is still subject to the assessment and accountability provisions in Title I. In other words, the LEA in which the school is located must assess all students beginning in grades 3 in the school, must calculate adequate yearly progress (AYP) for the school, and must identify the school for improvement, corrective action, or restructuring if it misses AYP for two consecutive years or more, even though the school is not using any Title I funds for students in the grades assessed.

G-3. May a school that receives SIG funds operate a preschool program with those funds?

The SIG program is primarily designed to raise the achievement of students in the persistently lowest-achieving schools in each State (essentially, Tier I and Tier II schools) by requiring such schools to implement one of four school intervention models: turnaround, restart, transformation, or school closure. If a Tier I elementary school that receives SIG funds determines that implementing a high-quality preschool program would help to improve the achievement of students in the school, it may use some of its SIG funds for that purpose, provided the school can fully and effectively implement its selected model. A Tier III elementary school (essentially, a Title I school in improvement, corrective action, or restructuring that is not a Tier I school) may also use its SIG funds to operate a preschool program. See the *Guidance on Fiscal Year 2010 School Improvement Grants under Section 1003(g) of the Elementary and Secondary Education Act of 1965* (Feb. 23, 2011) (available at <http://www2.ed.gov/programs/sif/sigguidance02232011.pdf>).

● **G-4. May an LEA reserve its entire Title I allocation to operate a districtwide Title I preschool program?**

◆ No. Title I is built on the concept of operating programs in eligible elementary and secondary schools. ESEA section 1113 and 34 C.F.R. § 200.78 require an LEA to allocate Title I funds to elementary and secondary “school attendance areas and schools.” Although an LEA may also reserve funds off the top of its Title I allocation to operate a districtwide Title I preschool program (see A-5), the LEA must ensure that there are enough funds remaining to make allocations to some or all of its eligible school attendance areas or schools. In addition, in accordance with ESEA section 1113 and 34 C.F.R. § 200.78, such allocations must enable participating schools to operate a Title I program of sufficient size, scope, and quality to help students served by the program achieve proficiency on the State’s academic achievement standards. If an LEA were permitted to reserve its entire Title I allocation to operate a districtwide preschool program, the LEA would be able to avoid the accountability requirements in ESEA section 1116 if the LEA or its schools are in improvement status, and the requirements to provide equitable services to private school children in ESEA section 1120.

● **G-5. May an LEA use Title I funds to expand or enhance other existing public preschool programs?**

◆ Yes. Consistent with ESEA section 1112(b)(1)(K), an LEA may use Title I funds to support existing preschool programs, such as Head Start or other comparable publicly funded preschool programs. See generally Section F of this document. However, if Title I funds are used to expand or enhance an existing public preschool program, that program is then considered to be a Title I program, and all Title I requirements apply, including SEA and LEA oversight of the program and the requirements with respect to eligible children.

● **G-6. Do the Title I supplement–not–supplant provisions apply to the use of Title I funds to operate a preschool program?**

◆ Yes. An LEA or school operating a Title I preschool program must comply with the same supplement not supplant requirements that apply to all Title I programs. The specific requirements depend on the type of program operated (see G-7).

◆ For additional information on the Title I supplement not supplant requirements, see the Department’s non-regulatory guidance, *Title I Fiscal Issues* (Feb. 2008), at pages 37-41 (available at <http://www.ed.gov/programs/titleiparta/fiscalguid.pdf>).

● **G-7. How does an LEA or school ensure that its use of Title I funds to operate a preschool program is supplemental?**

◆ How an LEA or school ensures that its use of Title I funds is supplemental differs depending on the type of Title I preschool program the LEA or school is operating.

◆ **Schoolwide program:** If a Title I schoolwide program school is operating a preschool program (see A-4), the LEA must ensure that the school receives all of the non-Federal funds it would otherwise have received if it were not operating a schoolwide program, including those funds necessary to provide services required by law (ESEA section 1114(a)(2)(B)).

- ◆ *Example 1:* If State law requires that an LEA provide preschool services to all four-year old children, it would violate the supplement not supplant requirement in ESEA section 1114(a)(2)(B) if the LEA does not provide a Title I schoolwide program school sufficient non-Federal resources to provide those services without regard to the school’s Title I funds. The schoolwide program school may use Title I funds, however, to supplement the preschool services required by State law by also serving, for example, three-year-old children.
- ◆ *Example 2:* If State law requires that an LEA provide preschool services to all four-year-old children from low-income families, it would violate the supplement not supplant requirement in ESEA section 1114(a)(2)(B) if the LEA does not provide a Title I schoolwide program school sufficient non-Federal resources to provide those services without regard to the school’s Title I funds. The schoolwide program school may use Title I funds, however, to supplement the preschool services required by State law by also serving, for example, four-year-old children who are not from low-income families.
- ◆ *Example 3:* If an LEA, as a matter of school board policy, provides a half-day preschool program in each of its schools, the LEA must provide sufficient non-Federal resources to a Title I schoolwide program school to provide those services. The schoolwide program school may use Title I funds, however, to supplement those preschool services by providing, for example, a full-day preschool program.

Targeted assistance program in a school or LEA: If an LEA or a Title I targeted assistance school is operating a preschool program, the LEA or school may use Title I funds only for preschool services that supplement those that would be available for Title I students from non-Federal funds in the absence of the Title I funds (ESEA section 1120A(b)). To determine whether its use of Title I funds for preschool services violates the supplanting prohibition in a targeted assistance program, the LEA or school must determine what preschool services, if any, it would have provided with non-Federal funds if Title I funds were not available using the following three presumptions:

1. Whether preschool services are required by law: Using Title I funds for preschool services that an LEA or Title I targeted assistance school is required to provide by State or local law raises a presumption of supplanting. Presumably, in the absence of Title I funds, the LEA or school would use non-Federal funds to provide preschool services that it is required by law to provide.
- ◆ *Example 1:* If State law requires preschool services for all four-year-old children, it would violate the supplement not supplant requirement in ESEA section 1120A(b) if an LEA or a Title I targeted assistance school uses Title I funds to provide those services to children who are at risk of

● failing to meet the State’s academic achievement standards while using non-Federal funds to provide those services to all other four-year-old children. An LEA or a targeted assistance school may use Title I funds, however, to supplement the preschool services required by State law by also serving, for example, three-year-old children who are most at risk of failing to meet the State’s academic achievement standards. Note that, in a targeted assistance Title I preschool program operated either by an LEA or a school, the only children who may be served with Title I funds are children who are most at risk of failing to meet the State’s academic achievement standards. (See B-2.) The exception is a districtwide preschool program in an LEA in which all elementary schools operate a Title I schoolwide program.

◆ *Example 2:* If State law requires preschool services for all four-year-old children from low-income families, it would violate the supplement not supplant requirement in ESEA section 1120A(b) if an LEA or a Title I targeted assistance school uses Title I funds to provide those services to children from low-income families who are most at risk of failing to meet the State’s academic achievement standards while using non-Federal funds to provide those services to other eligible children. An LEA or a targeted assistance school may use Title I funds, however, to supplement the preschool services required by State law by also serving, for example, four-year-old children who are not from low-income families but who are most at risk of failing to meet the State’s academic achievement standards.

◆ *Example 3:* If an LEA, as a matter of school board policy, provides a half-day preschool program for all four-year-old children in each of its schools, it would violate the supplement not supplant requirement in ESEA section 1120A(b) to use Title I funds to provide those services to any preschool children in a Title I targeted assistance school. An LEA or a targeted assistance school may use Title I funds, however, to supplement the half-day preschool program by providing, for example, a full-day preschool program for children who are most at risk of failing to meet the State’s academic achievement standards.

2. Whether the preschool program was provided in prior years with non-Federal funds: Using Title I funds for a preschool program, otherwise allowable under Title I, that an LEA or a Title I targeted assistance school provided in prior years with non-Federal funds raises a presumption of supplanting. Presumably, those activities the LEA or school deemed sufficiently important to support with non-Federal funds last year, for example, are a reliable predictor as to how it would likely spend its non-Federal funds in the current year.

This presumption may be rebutted, however, if the LEA or school can document contemporaneously that it would not have continued to provide the same preschool program with non-Federal funds, perhaps because of a budget shortfall or the changing educational needs of its students.

- ◆ *Example:* If an LEA or Title I targeted assistance school uses Title I funds to operate a preschool program supported in the prior year with State funds, the LEA or school may be able to rebut the presumption of supplanting by documenting contemporaneously that, in the absence of the Title I funds, the preschool program would not be provided because of a lack of State resources. Such documentation should demonstrate that:
 - There was in fact a reduced amount or lack of State funds available to pay for the preschool program; and
 - The LEA or school made the decision to eliminate the preschool program without taking into consideration the availability of Title I funds. These records, such as school board minutes, would include the reasons for the decision to eliminate the preschool program.
3. Whether the preschool program is provided to non-Title I students with non-Federal funds: Using Title I funds for a preschool program that an LEA is providing to non-Title I students with State or local funds raises a presumption of supplanting. Presumably, if an LEA deems it sufficiently important to provide a preschool program for non-Title I students, the LEA would also provide one for Title I students in the absence of Title I funds.
- ◆ *Example 1:* An LEA would violate the supplement not supplant requirement in ESEA section 1120A(b) if, to implement a districtwide preschool program, the LEA uses Title I funds to provide preschool services for children who are most at risk of failing to meet the State’s academic achievement standards and uses non-Federal funds to provide the same services to all other preschool children.
 - ◆ *Example 2:* A Title I targeted assistance school would violate the supplement not supplant requirement in ESEA section 1120A(b) if the school uses Title I funds to provide preschool services for children who live in the school’s attendance area and who are most at risk of failing to meet the State’s academic achievement standards while using non-Federal funds to provide the same services to preschool children who are not at risk.

An LEA may overcome this presumption, however, if it uses non-Federal funds for a preschool program that meets the intent and purposes of the Title I program consistent with the criteria in 34 C.F.R. § 200.79(b)(2). In essence, the preschool program must qualify as a Title I allowable activity — i.e., it must be supplemental, provided with supplemental State or local funds, and designed to meet the needs of preschool children who are most at risk of failing to meet the State’s academic achievement standards (ESEA section 1120A(d); 34 C.F.R. § 200.79(b)). In other words, if the program would be allowable under Title I — that is, it is supplemental and designed specifically to improve the achievement of preschool children who are most at risk of failing to meet the State’s academic achievement standards — it would not violate the supplanting prohibition, even if it is funded with supplemental State or local funds in non-Title I schools and Title I funds in Title I schools.

- ◆ *Example:* An LEA would not violate the supplement not supplant requirement if it uses Title I funds to provide a preschool program for at risk children who live in Title I participating school attendance areas and uses supplemental State or local funds to provide the same program for at risk preschool children who live in non-participating school attendance areas. The critical difference in this example is that the preschool children served with supplemental State or local funds would be eligible for Title I services if they resided in a Title I participating school attendance area.

G-8. May an LEA or a Title I targeted assistance school use Title I funds in a preschool program if only some of the children are eligible for Title I services?

Yes. However, Title I funds may only be used to pay for the costs for allowable Title I activities that are associated with the participation of preschool children who are eligible for Title I services. Federal funds such as those used to fund Head Start, Child Care, IDEA preschool programs, or other preschool programs, consistent with the requirements of those programs, may be used to pay for the costs associated with serving preschool children not eligible for Title I. If State and local funds are used to pay for the costs associated with the participation of preschool children who are not eligible for Title I, an LEA or a Title I targeted assistance school may be in violation of the supplement not supplant requirement of ESEA section 1120A(b). (See G-7.)

G-9. May an LEA use Title I funds to provide preschool services to eligible children in a Title I targeted assistance school while using non-Federal funds to provide the same services to other children in that school or in the LEA?

It depends. Generally, the use of Title I funds to provide preschool services to children who live in a Title I targeted assistance school attendance area and who are most at risk of failing to meet the State’s academic achievement standards while using non-Federal funds to provide the same services to other children either in the same school or in the LEA raises the presumption of supplanting and would not be an allowable use of Title I funds. (See G-7.) As noted in G-7, however, this presumption may be overcome if an LEA uses supplemental State or local funds to provide preschool services only to children who are at risk of failing to meet the State’s academic achievement standards and who live in non-participating school attendance areas.

To include preschool children who are not at risk of failing to meet the State’s academic achievement standards, an LEA might offer parents of non-Title I-eligible students the opportunity to pay to participate in the preschool program.

G-10. Where may an LEA operate a Title I preschool program?

An LEA may operate a Title I preschool program at any location that other Title I services may be provided, including public school buildings, public libraries, community centers, privately owned facilities (including facilities owned by faith-based organizations (FBOs)), a child’s home, and other appropriate settings.

G-11. If appropriate facilities are not available to house a preschool program in the LEA, how might Title I funds be used to provide preschool services?

If appropriate facilities are not available to provide a Title I preschool program, an LEA might consider using Title I funds to extend the number of hours, expand enrollment, or improve the quality of existing early learning programs such as Head Start or Child Care. In any case, the setting should be of sufficient quality to facilitate effective program implementation.

G-12. May Title I funds be used to pay the cost of renting a privately owned facility to provide preschool services?

Yes. Using Title I funds to pay the cost of renting space in a privately owned building is allowable if the space is necessary to ensure the success of a Title I preschool program, provided other appropriate space is not available to the LEA and the cost is reasonable (2 C.F.R. Part 225, Appendix B, ¶43).

G-13. May Title I funds be used for minor remodeling to accommodate a preschool program?

Yes. If other appropriate space is not available, Title I funds may be used for minor remodeling, which means minor alterations in a previously completed building and does not involve building construction or structural alterations to a building (34 C.F.R. § 77.1(c)). For example, Title I funds might be used to make minor alterations to bathroom facilities to accommodate small children.

G-14. Does Title I require an LEA to test preschool children?

No. Under ESEA section 1111(b)(3), third grade is the earliest grade at which children must be tested for program accountability purposes. However, the more teachers know about children’s cognitive, social-emotional, and health development, the better able they are to meet those children’s needs. Therefore, the Department recommends that an LEA use developmentally, linguistically, and culturally appropriate assessment measures to assist with individualizing instruction so that all Title I preschool children develop a strong foundation across all essential domains of school readiness. In addition, through initial screening and by ongoing monitoring of children’s progress, teachers and schools can identify those children who have high needs, require special help, or face multiple risk factors for school failure.

Assessment of young children does not imply the use of paper-and-pencil or large-group assessments, which are not allowed below third grade in some States. Rather, appropriate assessments for preschool children may include: observation and documentation of children’s learning, formative assessments, and carefully selected individually administered standardized assessments that are reliable and valid for the intended purpose and population. The information gleaned from these types of assessments should then be used to make informed decisions about instruction and should enhance teaching and learning.



When choosing an assessment tool, an LEA should ensure that the tool has been validated for its intended purpose and population. Care also should be taken to ensure that assessment tools are appropriate for use with English Learners and children with disabilities.

G-15. May a portion of Title I funds be used to provide preschool children with comprehensive services?

Yes. If preschool children eligible for Title I preschool services need health, nutrition, and other social services, and the LEA or school, if appropriate, has engaged in a comprehensive needs assessment and established a collaborative partnership with local service providers, and funds are not reasonably available from other public or private sources to provide those services, a portion of Title I funds may be used, as a last resort, to address those needs (ESEA section 1115(e) (2)).



H. SEA Support of Title I Preschool Programs

H-1. What oversight responsibilities does an SEA have with respect to a Title I preschool program?

As the Title I grantee, an SEA is responsible for oversight of all Title I programs, including preschool programs operated, in whole or in part, with Title I funds (ESEA sections 1111, 9304).

H-2. How can an SEA support Title I preschools?

Some SEAs are presently supporting Title I preschools through —

- ◆ promoting implementation of high-quality Title I preschool programs as an improvement strategy for schools and LEAs identified for improvement under the ESEA;
- ◆ encouraging the formation of mentoring relationships between effective preschools and those that are struggling;
- ◆ raising awareness about how Title I funds can best be used to support preschool programs and sharing research-based effective practices;
- ◆ supporting collaboration between the LEA and Head Start agency and other entities carrying out early learning programs;
- ◆ coordinating Title I preschool efforts with agencies administering other early learning programs and with State Advisory Councils for Early Care and Education (where they exist); and
- ◆ providing training on standards and in appropriately administering, interpreting and using assessment data in order to inform and improve instruction, programs, and services.

H-3. What achievement standards apply to preschool programs receiving Title I funds?

A Title I preschool program that provides services to children from low-income families must ensure that those services comply at a minimum with the education performance standards in effect under section 641A(a)(1)(B) of the Head Start Act (ESEA section 1112(c)(1)(G)) (available at <http://eclkc.ohs.acf.hhs.gov/hslc/Head%20Start%20Program/Program%20Design%20and%20Management/Head%20Start%20Requirements/Head%20Start%20Act/headstartact.html#641A>).

● The specific Head Start standards applicable to Title I preschool programs
◆ are in regulations at 45 C.F.R. § 1304.21 — Education and Early Childhood
● Development (available at <http://eclkc.ohs.acf.hhs.gov/hslc/Head%20Start%20Requirements/1304/1304.21%20Education%20and%20early%20childhood%20development..htm>).
◆

● **H-4. Where can an SEA, LEA, or school find additional resources
◆ for supporting high-quality preschool programs?**
●

◆ Additional resources can be found in the appendix of this guidance and at www.ed.gov/early-learning.
●



Appendix A: Selected Resources to Support High-Quality Early Learning Programs

The following resources represent a small sample of the research-based resources available to support high-quality early learning programs. Additional resources can be found at www.ed.gov/early-learning.

From the U.S. Department of Education

Developing Early Literacy: Report of the National Early Literacy Panel

This report of the National Early Literacy Panel examines the implications of instructional practices used with children from birth through age five. This publication is available to download free of charge at <http://lincs.ed.gov/publications/pdf/NELPReport09.pdf>.

Early Beginnings: Early Literacy Knowledge and Instruction

This guide is to help early childhood administrators, supervisors, and professional development staff provide teachers with the support and training needed to increase their knowledge base and refine current literacy practice. This publication is available to download free of charge at <http://lincs.ed.gov/publications/pdf/NELPEarlyBeginnings09.pdf>.

Teaching Our Youngest: Guide for Preschool Teachers, Child Care and Family Providers

This guide discusses how to help children develop their language abilities, increase their knowledge, become familiar with books and other printed materials, learn letters and sounds, recognize numbers, and learn to count. This publication is available to download free of charge at <http://www2.ed.gov/teachers/how/early/teachingouryoungest/teachingouryoungest.pdf>.

Helping Your Preschool Child

How well children will learn and develop and how well they will do in school depends on a number of things, including their health and physical well-being, social and emotional preparation, and language skills and general knowledge of the world. This booklet highlights techniques parents can use to encourage their children to develop the skills necessary for success in school and life by focusing on activities that make learning fun. This publication is available to download free at <http://www2.ed.gov/parents/earlychild/ready/preschool/preschool.pdf> and in Spanish at <http://www2.ed.gov/espanol/parents/academic/preescolar/preescolar.pdf>.



● ***Learning to Talk and Listen***

◆ An oral language resource for early childhood caregivers. This publication is available to download free at <http://lincs.ed.gov/publications/pdf/LearningtoTalkandListen.pdf>.

● ***Words All Around***

◆ Language Building Tips for Center-Based and Home-Based Child Care Providers. This publication is available to download free at http://lincs.ed.gov/publications/pdf/language_tipsheet.pdf.

● ***Shining Stars: Toddlers Get Ready to Read: How Parents Can Help Their Toddlers Get Ready to Read***

◆ This publication is available to download free at <http://lincs.ed.gov/publications/pdf/ShiningStarsToddlers.pdf>.

● ***Shining Stars: Preschoolers Get Ready to Read: How Parents Can Help Their Preschoolers Get Ready to Read***

◆ This publication is available to download free at <http://lincs.ed.gov/publications/pdf/ShiningStarsPreschool.pdf>.

● ***Typical Language Accomplishments for Children, Birth to Age 6—Helping Your Child Become a Reader***

◆ Learning to read is built on a foundation of language skills that children start to learn at birth—a process that is both complicated and amazing. Most children develop certain skills as they move through the early stages of learning language. This publication is available to download free at <http://www2.ed.gov/parents/academic/help/reader/part9.html>.

● **From the U.S. Department of Health and Human Services**

● ***Compendium of Quality Rating Systems and Evaluations***

◆ The Office of Planning, Research and Evaluation (OPRE) in the Administration for Children and Families (ACF), U.S. Department of Health and Human Services (DHHS) offers this compendium which provides definitions, description, and an analytic framework for assessing the critical elements of Quality Rating and Assessment Systems (QRS) and QRS evaluations. This publication is available to download free at <http://www.childrensdefense.org/child-research-data-publications/data/qris-compendium.pdf>.

● ***Give Your Child Something That Will Last a Lifetime***

◆ This brochure provides parents with five helpful steps to choosing quality child care. It also includes a checklist to use when choosing a child care home or center. This publication is available to download free at <http://ccapub.childcareaware.org/docs/pubs/101e.pdf> and in Spanish at <http://ccapub.childcareaware.org/docs/pubs/101s.pdf>.

Revisiting and Updating the Multicultural Principles for Head Start Programs Serving Children Ages Birth to Five

This publication highlights the ten original Multicultural Principles (1991) and includes a brief research review, key implications, stories from the Head Start community, as well as reflective questions or activities. This publication is available to download free at http://eclkc.ohs.acf.hhs.gov/hslc/resources/ECLKC_Bookstore/PDFs/Revisiting%20Multicultural%20Principles%20for%20Head%20Start_English.pdf.

From the National Research Council

Eager to Learn: Educating Our Preschoolers

This book includes research findings on how children’s early experiences lay the foundations for their later social and emotional behavior, as well as their literacy and cognitive development. The entire text can be viewed on-line at <http://www.nap.edu/openbook.php?isbn=0309068363>.

Early Childhood Assessment: Why, What, and How

This book looks at how assessments that are well designed, effectively implemented, developed in the context of systematic planning, and interpreted and used appropriately can inform teaching and program improvement, and contribute to better outcomes for children. The entire text can be viewed on-line at http://www.nap.edu/catalog.php?record_id=12446.

Mathematics Learning in Early Childhood: Paths Toward Excellence and Equity

This book provides information about the critical areas that should be the focus of young children’s early mathematics education, explores the extent to which they are currently being incorporated in early childhood settings, and identifies the changes needed to improve the quality of mathematics experiences for young children. The entire text can be viewed on-line for free at http://www.nap.edu/catalog.php?record_id=12519#description.

Preventing Reading Difficulties in Young Children

This book provides a summary report that examines research findings to provide an integrated picture of how reading develops and the importance of high-quality preschool and kindergarten environments and their contribution to providing a critical foundation to facilitate children’s acquisition of essential reading skills. The entire text can be viewed on-line at http://www.nap.edu/catalog.php?record_id=6023.

Starting Out Right: A Guide to Promoting Children’s Reading Success

This is a practitioner’s guide based on Preventing Reading Difficulties in Young Children. This book can be viewed on-line at http://www.nap.edu/catalog.php?record_id=6014.



Additional Resources

The U.S. Department of Education is providing the list of resources below for the reader's convenience, and no official endorsement by the U.S. Department of Education is intended or should be inferred. The views expressed by the authors are their own, and do not necessarily represent the policies of the Federal government or the U.S. Department of Education.

Dual Language Learners in the Early Years: Getting Ready to Succeed in School

This report examines the conditions of early childhood for dual language learners (DLLs) from a variety of angles and discusses the degree to which the nation is succeeding in preparing DLLs for kindergarten and first grade. This publication is available to download free of charge at http://www.ncela.gwu.edu/files/rcd/BE024206/Dual_Language_Learners.pdf.

Make the Most of Playtime

This publication features tips for how parents can help children learn and develop new skills through play. This publication is available to download free at http://csefel.vanderbilt.edu/documents/make_the_most_of_playtime2.pdf.

Developmentally Appropriate Practice in Early Childhood Programs Serving Children Birth through Age 8

by Carol Copple & Sue Bredekamp (2009). Since the first edition in 1987, NAEYC's book, *Developmentally Appropriate Practice (DAP) in Early Childhood Programs*, has been an essential resource for the early child care field. This is the revised and expanded third edition based on what the research says about development, learning, and effective practices, as well as what experience tells us about teaching intentionally. Chapters describe children from birth through age 8, including extensive examples of appropriate practice for infant/toddler, preschool, kindergarten, and primary levels. The NAEYC position paper of DAP is available at <http://www.naeyc.org/files/naeyc/file/positions/position%20statement%20Web.pdf>.

Taking Stock: Assessing and Improving Early Childhood Learning and Program Quality by The National Early Childhood Accountability Task Force (October 2007).

This report of the National Early Childhood Accountability Task Force makes recommendations on developing a comprehensive assessment system to improve child outcomes that include aligning high-quality and comprehensive standards, curriculum, instruction, and assessments as a continuum from preschool through third grade. The Task Force argues their recommendations are flexible enough to be adapted in multiple states, employ state-of-the-art evaluation methods, and focus on how assessment data can be used to improve preschool programs, and enhance positive outcomes for children. This report is available at http://www.icpsr.mich.edu/files/PREK3RD/resources/pdf/accountability_Task_Force_FinalReport1.pdf

***The Scientist in the Crib* by Alison Gopnik, Andrew Meltzoff, and Patricia Kuhl (1999).**

This book looks with great detail into the relationship between science and young children’s development. The authors concisely articulate the body of information that is now known about children’s minds and how they learn.

***The Social World of Children: Learning to Talk* by Betty Hart and Todd Risley (1999).**

This book follows the groundbreaking study reported by Hart and Risley in their earlier book, *Meaningful Differences in the Everyday Experiences of Young American Children*. It goes beyond the discussion in the earlier book on the role of language experience in the intergenerational transmission of language competence and examines the patterns in that transmission. The authors provide tables and figures with their data and thoroughly discuss their findings. Hart and Risley state that they have a simple message for parents: their conversation matters when their children are young. Talking with children provides them with experiences that are important to both their cognitive and their social/emotional learning. The authors provide evidence that the language tools provided to children through conversation can contribute at least as much to a child’s future success as their heredity and their choice of friends.

***Handbook of Early Literacy Research, Volume 2* by David Dickinson and Susan Neuman (2006).**

This volume is an update to Volume I, which examined current research on early literacy and intervention. It provides additional perspectives on important topics that were covered earlier and addresses broad questions about the nature of early literacy, and then continues by summarizing current knowledge on cognitive development, and emphasizing the importance of cultural contexts in the acquisition of literacy. As in the first volume, chapters focus on various skills and knowledge that emerge as children become literate, as well as the roles of peers and families in this process. Attention is devoted to the importance of meeting the literacy needs of all children and emphasizes the importance of coordinated school, family, and social services to provide the necessary support for those children who struggle most in school. Various approaches to instruction, assessment, and early intervention and research on the efficacy of these approaches are described. Critical new topics are addressed in this new volume, such as the transition to school, the teacher-child relationship, sociodramatic play, vocabulary development, neuroimaging work, Vygotskian theory, and findings from international studies.

***Success in Early Intervention: The Chicago Child-Parent Centers* by Arthur Reynolds (2000).**

This book reports on the effects of participation in the Title I funded Chicago Child-Parent Center (CPC) Program in which over 1,200 low-income preschool children participated. Since 1967, the CPC’s provided educational and family support services from preschool to the early elementary grades for up to six years of continuous intervention. The data reported in this monograph are from the Chicago Longitudinal Study that began in the spring of 1986. The strong support for the cognitive advantage hypothesis found in this study indicates that programs may be more likely to have long-term effects if they directly impact cognitive and scholastic development during the early childhood years.









The Department of Education's mission is to promote student achievement and preparation for global competitiveness by fostering educational excellence and ensuring equal access.

www.ed.gov