

SUMMARY OF TITLE I NON-REGULATORY GUIDANCE SERVING PRESCHOOL CHILDREN

Michael Yudin, Acting Assistant Secretary, Office of Elementary and Secondary Education, released non-regulatory guidance on April 16, 2012 to provide clarity regarding how Title I of the Elementary and Secondary Education Act (ESEA), Part A funds may be used to implement high-quality preschool programs. This guidance may be found at:
<http://www2.ed.gov/policy/elsec/guid/preschoolguidance2012.pdf>.

Guidance in this document replaces previous non-regulatory Title I guidance on serving preschool age children beginning at birth. It addresses Title I requirements in the ESEA and answers questions raised by State Education Agencies (SEAs), and Local Education Agencies (LEAs or school districts), 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.

General Information

- **Definition:** 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.
- **Use of Title I Funds:**
 - A. A Title I school may use all or a portion of its Title I funds to operate a preschool program for eligible children
 - B. 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
 - C. An LEA may use Title I funds to coordinate with and support eligible children enrolled in other preschool programs, such as Head Start.
 - D. For definitions of each of these uses, see pages 8 and 9 of the guidance

Eligible Children

- **Definition:** 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.**
- **Types of Title I preschool programs**
 - A. *Title I school-wide program:* all preschool-age children residing in the attendance area of the school are eligible to participate in the Title I preschool program.
 - B. *Title I targeted assistance program:* 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.
 - C. *Title I District wide program:* 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 district wide 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 district wide preschool program to benefit all preschool children in the LEA unless all the schools in the LEA are Title I schools operating school wide programs.

D. *Children automatically eligible to participate:*

- 1) children who participated in Head Start or a Title I preschool program at any time in the prior two years;
- 2) children who received services under Part C of Title I (migrant education) in the prior two years;
- 3) homeless preschool-age children
- 4) children who are in a local institution for neglected or delinquent children and youth or attending a community-day program for these children.

Qualifications of Early Childhood Educators Working in a Title I Program

- 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. Preschool teachers must also meet the specific standards required by the programs in which they are teaching (i.e., requirements per the state-funded preschool program). 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” for k-12.
- Paraprofessionals working in Title I Programs are individuals who provide instructional support under the direct supervision of a teacher. They are required to have earned a secondary school diploma or its recognized equivalent and
 - 1) must have completed at least two years of study at an institution of higher education; or
 - 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
- Professional Development - 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 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.
 - 1) 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.
 - 2) Title I funds may be used for 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.

Transition from Preschool to Kindergarten

- 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.

Coordination with Other Federal Programs

- Each LEA receiving Title I funds, regardless of whether it operates a Title I preschool program, must carry out coordination activities with Head Start agencies and, if feasible, other early learning programs such as child care, state-funded preschool programs, and or other community-based early learning programs for at-risk children that serve children who will attend the schools of the LEA. (For details see page 19 and 20.)
- **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. If an LEA chooses to do this the program must at a minimum meet Federal Head Start Education and Early childhood Development Standards...(Pages 20 and 21)**
- An LEA may use School Improvement Grant funds to include implementing a high-quality preschool program that is designed to improve school readiness for high-need young children.
- Race to the Top – Early Learning Challenge Program – states are 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.

Use of Funds

- 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.
- **An LEA may use Title I funds to support existing preschool programs, such as Head Start or other comparable publicly funded preschool programs.**
- An LEA or a Title I targeted assistance school may use Title I funds in a preschool program if only some of the children are eligible for Title I services. 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.
- 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.
- **Title I does not require an LEA to test preschool children.** However, 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. The document

emphasizes that assessment of young children does not imply the use of a paper-and-pencil or large-group assessments, which are not allowed below third grade in some States. 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.

Strategies for SEAs to Support of Title I Preschool Programs

The following strategies are recommended by this Guidance:

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

Achievement Standards that 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. 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.

(<http://eclkc.ohs.acf.hhs.gov/hslc/Head%20Start%20Program/Program%20Design%20and%20Management/Head%20Start%20Requirements/Head%20Start%20Requirements/1304/1304.21%20Education%20and%20early%20childhood%20development.htm>)

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