

Serving Preschool Children Under Title I

Selected Excerpts from U.S. Education Department Non-Regulatory Guidance¹

General

What does “preschool program” mean for the purposes of Title I?

For the purpose of Title I, a preschool program is a program of educational services for eligible children below the age at which the LEA provides elementary education and is focused on raising the academic achievement of children once they reach school age. *[Section 1115(b)(1)(A)(ii), ESEA.]* [See D-5 through D-7 for further information on eligible children.] In some States, elementary education begins at first grade; in others it begins at kindergarten or before.

Who is considered a preschool-age child?

A preschool-age child is one who is below the grade level and age at which the LEA provides elementary education. *[34 CFR Section 77.1(c).]* For the purposes of Title I, children from birth to the age that the LEA provides a free public elementary education may receive preschool services. *[Section 1115(b)(1)(A)(ii), ESEA.]*

Must Title I preschools meet the supplement-not-supplant requirement?

Yes. *[Section 1120A(b), ESEA.]*

State Administration

What type of oversight responsibility do SEAs have for Title I preschools?

As the Title I grantee, the SEA is responsible for oversight of all Title I programs, including preschool programs operated with Title I funds. *[Sections 1111 and 1112, ESEA.]*

How can SEAs support Title I preschools?

Some SEAs are presently supporting Title I preschools through their early childhood endeavors by—

- disseminating information, through publications, conferences, and other events, that describes how Title I funds can best be used to support preschool programs;
- coordinating Title I efforts with offices for early childhood education (where they exist);
- developing State preschool standards in the cognitive and language domains;
- monitoring programs to ensure that Title I preschool is meeting program goals;
- considering early intervention as an appropriate measure to prevent later academic difficulties when providing technical assistance to schools that are in school improvement; and
- providing funds for professional development and improving the cognitive focus in preschools through special initiatives.

¹ All information in this document is quoted directly from “Serving Preschool Children under Title I,” non-regulatory guidance issued by the U.S. Education Department, 4 March 2004, www.ed.gov/policy/elsec/guid/preschoolguidance.doc, but has been re-organized by topic, as indicated by the sub-headings.

What type of technical assistance can SEAs provide to LEAs in order to ensure high-quality Title I preschools?

In addition to supporting Title I preschools through broad-based efforts, such as those mentioned in C-2, SEAs can provide targeted support to LEAs through technical assistance that is specifically focused upon improving local program quality.

SEAs can –

- provide professional development for early childhood educators, by holding on-going workshops and training for practitioners to learn how to apply research-based practices in their classrooms, and providing support for follow-up coaching and mentoring opportunities;
- provide information about the State content standards for K-3;
- disseminate information through a list-serv, conferences, or other events in order to share research-based practices to use in preschools and highlight particularly effective preschools in their State; and
- encourage the use of mentoring relationships between effective preschools and those that are struggling.

What requirements must a Title I preschool program meet if it uses an Even Start model?

A Title I preschool program using an Even Start model must integrate early childhood education, adult literacy or adult basic education, and parenting education into a unified family literacy program. *[Section 1231, ESEA.]* Additionally, the Title I preschool programs using an Even Start model must include program elements (1) through (15) in section 1235 of Title I, Part B (Even Start Family Literacy Program). The legislation for the Even Start Family Literacy Program is at: <http://www.ed.gov/programs/evenstartformula/legislation.html?exp=0>.

LEA and School-Level Uses of Funds

How may preschool programs be funded under Title I?

There are several ways in which preschool programs may be funded under Title I. For example—

- A participating school may use its Title I funds to operate a preschool program.
- An LEA may reserve an amount from the LEA's total allocation to operate a Title I preschool program for eligible children in the district as a whole or for a portion of the district. *[Section 1112(b)(1)(K), ESEA.]*

How may district-operated Title I preschool programs be funded?

An LEA may reserve an amount from the LEA's total allocation and distribute those funds to specific Title I schools, or other comparable public early childhood education programs to operate Title I preschool programs. Head Start, Even Start, and Early Reading First are examples of such programs. [See G-2 and G-3] *[Section 1112(b)(1)(K), ESEA.]*

May an LEA or school use Title I School Improvement funds for a preschool program?

Yes. If a local educational agency or school receives School Improvement funds, the district or school may use those School Improvement funds to conduct a preschool program if the preschool program is a strategy that addresses the specific academic issues that caused the district or school to

be identified for school improvement, and the preschool program is carried out in accordance with the district's or school's improvement plan. *[Sections 1116(b)(3)(A), 1116(c)(7)(A), ESEA.]*

Eligibility

May an LEA or school use Title I funds to identify eligible preschool children?

Generally, it is the responsibility of an LEA and school to use information it already has available to identify at-risk children. However, if an LEA has no existing assessment data for preschool children, Title I funds may be used for identifying these children.

What children are eligible for participation in a Title I-supported preschool program in a school operating a schoolwide program?

A preschool that is part of a Title I school operating a schoolwide program is not required to identify particular children as eligible to participate in the Title I preschool. Rather, all children in the attendance area of that school are eligible for preschool services. *[Section 1114(a)(2), ESEA.]*

What children are eligible for participation in a Title I-supported preschool program in a Title I targeted assistance school?

To be *eligible* to attend a Title I preschool program in a targeted assistance school, preschool-age children — like school-age children — must be failing or most at risk of failing to meet the State's challenging student academic achievement standards as determined by multiple, educationally related, objective criteria established by the LEA and supplemented by the school. With respect to preschool children, this determination must be made on the basis of criteria such as teacher judgment, interviews with parents, and developmentally appropriate measures of child development. *[Section 1115(b), ESEA.]*

The use of family income to determine eligibility for Title I preschool is allowable, especially for the purposes of prioritizing when there are not sufficient Title I resources to serve all preschool age children with other educational needs, but children should not be identified for Title I preschool solely on the basis of family income.

In addition, children who participated in a Head Start, Even Start, Early Reading First, or Title I preschool program at any time during the two preceding years, homeless children, and children in institutions for neglected or delinquent children are automatically eligible for Title I preschool and to continue into Title I school programs. *[Section 1115(b)(2), ESEA.]*

Are children in private preschools eligible for equitable Title I services?

Not generally. Section 1120 of Title I requires an LEA to provide equitable services to eligible children who are enrolled in private elementary schools and secondary schools. As a result, unless State law considers preschools to be part of elementary education, children in private preschools are not enrolled in an elementary school and thus are not eligible to receive Title I services.

Are children with disabilities eligible to participate in Title I preschool programs?

Yes. Children with disabilities are eligible to receive Title I services on the same basis as eligible children without disabilities.

Are migrant children eligible to participate in Title I preschool programs?

Yes. Migrant children are eligible to receive Title I services on the same basis as eligible non-migrant children. *[Section 1115(b)(2)(A), ESEA.]*

Coordination with Other Programs

How must Title I preschool programs coordinate with other preschool programs providing educational services?

An LEA's Title I plan must describe how it will coordinate and integrate services under Title I with other educational services such as Even Start, Head Start, Early Reading First and other preschool programs, including its plans for the transition of children in those programs to elementary school programs. *[Section 1112(b)(1)(E)(i), ESEA.]* An LEA must also describe, if appropriate, how it will use Title I funds to support preschool programs for children, particularly children participating in a Head Start, Early Reading First or Even Start program as these children are automatically eligible for Title I when they then enter kindergarten. An LEA may support preschool programs by providing such services directly or through a local Head Start agency, an agency operating an Even Start program, Early Reading First, or another comparable public early childhood education program. *[Section 1112(b)(1)(K), ESEA.]*

How may a school or LEA coordinate the use of Title I funds with Even Start Title I, Part B funds?

SEAs and LEAs have considerable flexibility in coordinating Title I funds used for preschool with Even Start funds. For example, an LEA may include appropriate Title I activities as part of its Even Start project. A Title I preschool program could provide, in full or part, the early childhood component of an Even Start project. Similarly, Title I services that provide training for parents of Title I participants to help them assist in their children's education could also be included in an Even Start project. Such coordination is enhanced by several other provisions as well. Title I funds may be used to increase parent involvement, *including family literacy* *[Section 1118, ESEA]*; and Title I funds or in-kind contributions may be used to meet the local share requirement under Even Start. *[Section 1234(b)(1)(B), ESEA.]* If an LEA includes Title I activities as part of its Even Start project, it must ensure that the Title I activities are consistent with the requirements of the Title I program as well as Even Start.

How may a school or LEA use Title I funds to complement or extend Head Start programs?

In addition to supporting preschool children participating in Title I programs, Title I funds may also be used to complement or extend Head Start programs. 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 because they reside in an eligible attendance area and are most at risk of not meeting the State's challenging student achievement standards, might not qualify for Head Start under Head Start's income requirement. In this case, Title I funds may be used to provide services to Title I eligible children who are not eligible for Head Start services.

- Head Start may be unable to serve all its eligible students. Title I funds may be used to serve unserved children who are also eligible for Title I (i.e., those who reside in eligible Title I attendance areas and are failing, or most at risk of failing, to meet the State's challenging student achievement standards). Note that some Head Start-eligible children might not be eligible for Title I.
- Title I 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 additional time or increasing the number of days, providing services at times Head Start is not operating, or enriching services through 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.

Are Title I preschool programs required to coordinate with Migrant Education Program (MEP) services?

Yes. The statute requires LEAs to coordinate and integrate Title I services with services provided at the LEA or school level for migratory children. *[Section 1112(b)(1)(E)(ii), ESEA.]* Similarly, the MEP has a responsibility to coordinate with Title I programs. *[Section 1304(c)(1)(B), ESEA.]* The requirements for such coordination increase program effectiveness, eliminate duplication, and reduce fragmentation of the instructional program.

Facilities

Where may Title I preschool services be provided?

Preschool services may be provided 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)), the child's home and other appropriate settings.

If appropriate facilities are not available to house a preschool program in the district or a school, how might preschool services be provided?

If appropriate district or school facilities are not available for preschool services, the district and school should consider working with children in existing childcare programs such as Head Start, Even Start, Early Reading First, or a program funded under the Child Care Development Block Grant, or a site conducting a family literacy program. In any case, the setting should be of sufficient quality to facilitate effective program implementation.

May Title I funds be used to pay the cost of renting or leasing privately owned facilities for preschool instructional purposes or for office space?

Yes. The cost to rent or lease space in privately owned buildings is allowable if the space is necessary to ensure the success of the program, appropriate space is not available to the grantee, and the cost is reasonable.

May Title I funds be used for minor remodeling to accommodate a preschool program?

If 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 buildings. [34 CFR Section 77.1(c).]

Teacher Training

May Title I funds be used to provide professional development for preschool teachers and paraprofessionals not paid with Title I funds?

Title I funds may be used to provide professional development for any teacher or paraprofessional working in a Title I preschool program supported partly by Title I funding even if their salary is not paid for with Title I funds if the training is related to the Title I program and is designed to meet the educational needs of Title I children. For example, Title I funds may be used for professional development for a Head Start teacher working in a preschool program jointly funded by Title I and Head Start if the training is related to the Title I program or is designed to help the Head Start teachers meet the educational needs of Title I children.

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

Assessment

Are LEAs or schools required by Title I to test preschool children?

No. Under Title I, third grade is the earliest grade at which children must be tested. [Section 1111(b)(3)(C)(v), ESEA.] However, the more that teachers know about children's academic, social, and emotional development, the more able they are to meet those children's needs. Therefore, the Secretary recommends that LEAs and schools develop age-appropriate screening and assessment measures to assist with individualizing instruction so that all Title I preschool students develop a strong foundation in literacy and numeracy. In addition, through initial screening and by checking the children's progress, teachers and schools can identify those children who need special help or who face extra challenges.

Screenings and assessments for preschool children do not imply the use of paper- and-pencil, and large-group assessments, which are not allowed below the third grade in some States. Rather, appropriate assessments for preschool children include individually administered standardized assessments, observational checklists completed by teachers while students play, or an analysis of student work. The information gleaned from these types of assessments should then be used to make informed decisions about instruction and enhance teaching and learning, rather than to make judgments regarding the efficacy of a school or a system.

When choosing a screening or assessment tool, LEAs and schools should ensure that it has been validated for its intended purpose and population. For example, it is not appropriate to use a first-grade skills assessment for screening or assessing a preschool-age child.

Comprehensive Services

May a portion of Title I funds be used to provide preschool participants with comprehensive services?

Yes. If preschool children have need for health, nutrition, and other social services, a portion of Title I funds in a targeted assistance school may be used to address those needs, if appropriate, based on a comprehensive needs assessment and funds are not reasonably available from other public or private sources. *[Section 1115(e)(2), ESEA.]*

Transition to Elementary School

Must a schoolwide program include plans to assist preschool children in the transition from preschool to local elementary school?

Yes. A schoolwide program must include plans for assisting preschool children in the transition from early childhood programs, such as Title I preschool, Head Start, Even Start, or Early Reading First, to local elementary school programs. *[Section 1114(b)(1)(G), ESEA.]* [Also see examples of transition activities in B-11.]

What responsibility do targeted assistance programs have with respect to assisting preschool children in the transition from preschool to local elementary school?

Targeted assistance programs must coordinate with and support the school's regular education program, which may include services to assist preschool children in the transition from early childhood programs such as Head Start, Even Start, Early Reading First, or State-run preschool programs to elementary school programs. *[Section 1115(c)(1)(D), ESEA.]*

Parental Involvement

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

Title I LEAs and schools must, to the extent feasible and appropriate, coordinate and integrate Title I parent involvement strategies and activities with parent involvement strategies under other programs such as Head Start, Reading First, Early Reading First, Even Start, Parents as Teachers Program, the Home Instruction Program for Preschool Youngsters, and State preschool programs. *[Section 1118(a)(2)(D) and 1118(e)(4), ESEA.]*

How can Title I preschools build capacity for significant parental involvement?

The quality of family environments and parent-child interactions is central to a child's literacy development and education. As described in B-10, parents strengthen their child's literacy development and school-related competencies when they engage in language-rich parent-child interaction, provide support for literacy in the family and hold appropriate expectations of the

child's learning and development. Accordingly, preschools can provide parents with educational training in those parenting skills most closely associated with children's language and cognitive development. Furthermore, preschools can share the preschool curriculum goals and indicate how parents can support this learning at home.

May schools include parents of children in Title I preschool programs in professional development activities?

Yes. Title I schools must provide reasonable support for parental involvement activities as parents of participating children may request, including allowing parents to participate in professional development activities that the school or LEA deems appropriate. In addition, LEA plans must describe the strategy the LEA will use to coordinate the Title I program 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. *[Section 1118(e), ESEA.]* [See B-10]

What is the relationship between Early Reading First and Title I preschool?

Early Reading First is designed to transform existing early education programs, such as Title I preschools, child care agencies and programs, Head Start centers, and family literacy programs such as Even Start, into centers of early learning excellence that will result in preschool-age children developing the early language and cognitive skills they need to enter school ready to read. Early Reading First funds provide the opportunity for these preschool programs to change the classroom environment, provide professional development for staff in scientific reading research-based instruction, support preschool children's language and cognitive development, and use screening assessments and progress monitoring to identify and work with preschool children who may be at risk for reading failure. *[Sections 1221 –1226, ESEA.]*