# Using Title I, Part A Funds for Preschool Programs

As Local Education Agencies (LEAs) begin developing their annual Elementary and Secondary Education Act (ESEA) – Every Student Succeeds Act (ESSA) - Consolidated Applications, the New Jersey Department of Education (NJDOE) would like to emphasize the flexibility of Title I, Part A (Title IA) funds to support preschool programs. Title IA of the ESEA aims to "provide all children significant opportunity to receive a fair, equitable, and high-quality education, and to close educational achievement gaps." Research has proven that students in high-poverty schools have a better chance of achieving academic success if they are exposed to high-quality preschool programs.¹ Therefore, the NJDOE encourages LEAs to maximize the use of their Title IA funds to provide programs and services for eligible preschool children. The following information is provided to help you determine how to serve preschool-aged children with Title IA funds. funds to provide to help you determine how to serve preschool-aged children with Title IA funds.

## **Student Eligibility**

According to the United States Department of Education (USED), any LEA or school that receives Title IA funds may use the funds to operate, in whole or in part, a preschool program consistent with Title IA requirements. A Title IA LEA or school determines whether to use its Title IA funds to operate a preschool program based on the needs of its eligible students and the most effective use of those funds. LEAs may use their Title IA funds to implement a Title I preschool program in one of the following settings:

- a) School-operated Title I preschool program;
- b) LEA-operated Title I preschool program; or
- c) Through coordination with other preschool programs, such as Head Start and other community-based providers.

<sup>1.</sup> Yoshikawa, H., Weiland, C., Brooks-Gunn, J., Burchinal, M., Espinosa, L., Gormley, W., Ludwig, J., Magnuson, K., Phillips, D., & Zaslow, M. (2013). *Investing in Our Future: The Evidence Base on preschool Education*. Evidence Base on Preschool Education

Eligible children are all preschool-aged students in a school that operates a Title I schoolwide program. In a Title I targeted assistance program, the school provides services to students with the greatest need for assistance – i.e., those identified by the school as failing, or most at risk of failing, to meet the challenging State academic standards. Accordingly, if a targeted assistance school operates a preschool program, Title IA funds may only be used to serve preschool children whom the school identifies as most at risk of failing to meet the challenging State academic standards when they reach school age. LEAs may also consider family income as a factor for identifying at-risk preschool-aged children, especially to prioritize when there are not enough Title IA funds to serve all eligible preschool-age children. However, children should not be identified as eligible for a Title I preschool program solely based on family income. An LEA may not use Title IA 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. Children meeting any of the following criteria are automatically eligible to participate in a Title I preschool program:

- 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;
- Preschool-aged children experiencing homelessness; and
- Children who are in a local institution for neglected or delinquent children (Title I, Part D) and youth or attending a community day program for these children.

#### Allowable Uses of Title IA Funds

When using Title IA funds for a preschool program, districts must adhere to the Title I requirement that funds supplement, not supplant, state/local funds. Generally, in a preschool program, Title IA funds may be used to supplement, enhance, or expand existing preschool programs, including State-funded preschool, childcare, and community-based early learning programs, for children who are eligible for Title IA services. This may include

extending the daily program, increasing the number of days in the program, increasing the quality of the program, providing services at times the program is not operating, or enriching services through the provision of extra personnel to work with Title I-eligible children.

Other allowable uses of Title IA funds include the cost to rent an adequate facility to host a preschool program or to make minor renovations to an existing facility (which means minor alterations in a previously completed building and does not involve building construction or structural alterations to a building). A portion of Title IA funds may be used, as a last resort, to provide Title I eligible preschool children with comprehensive service components such as health, nutrition, and other social services when the LEA or school 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, to address those needs.

#### **Additional Considerations**

When an LEA decides to use Title IA funds to provide early childhood education services, including a preschool program, LEAs must be aware of the following requirements:

• The LEA's Consolidated Application and/or Annual School Plan must describe how it will support, coordinate, and integrate services provided under Title IA with early childhood education programs at the LEA or individual school level, including plans for the transition of participants in such programs to local elementary school programs (e.g., the transition from preschool to kindergarten) (ESEA section Ba1112(b)(8)); and Include an assurance in its Consolidated Application and/or Annual School Plan that it will ensure that the early childhood education services provided using Title IA funds comply with the performance standards established under section 641A(a) of the Head Start Act (42 U.S.C. 9836a(a)), and (ESEA section 1112(c)(7)). For information on specific Head Start performance standards applicable to Title I preschool programs, please reference section H-3 of Serving

<u>Preschool Children Through Title I, Part A of the Elementary and Secondary</u>

Education Act of 1965, as Amended, Non-Regulatory Guidance. February 2024.

- Qualifications for Teachers and Paraprofessionals:
  - 1. Teachers: Each LEA must ensure that all teachers working in a program supported with Title IA funds meet applicable State certification and licensure requirements, including any requirements for certification obtained through alternative routes of education. Teachers in a Title IA Program should hold the highest professional standards for teaching young children, including a baccalaureate degree and a comprehensive education or early elementary education, and possess strong knowledge of child development and background in developmentally informed practices. Per federal legislation [Head Start Act section 648A(a)(2)(A)], at least fifty percent of Head Start teachers nationwide in center-based programs must have (I) 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; or (3) a baccalaureate degree and has been admitted into the Teach For America program, passed a rigorous early childhood content exam, such as the Praxis II, participated in a Teach For America summer training institute that includes teaching preschool children, and is receiving ongoing professional development and support from Teach For America's professional staff (Head Start Act section 648A(a)(3)(B)).
  - 2. Paraprofessionals: Those working in a program supported with funds under Title IA? must meet the following requirements:
    - (a) Possess a secondary school diploma or its recognized equivalent; and
    - (b) Completed at least two years of study at an institution of higher education; or
    - (c) Earned an associate or higher degree; or

- (d) 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 (34 C.F.R. § 200.58(b)-(d)).
- Title IA parent and family engagement requirements: According to the most recent non-regulatory guidance on serving preschool children through Title IA, "In the case of an LEA operating a Title I preschool program, a school could, but would not be required to, include parents of preschool children in its school parent and family engagement policy under ESEA section 1116(b). The LEA, however, would be required to include parents of preschool children in its parent and family engagement policy under ESEA section 1116(a). Alternately, a school operating a Title 1 preschool program would be required to include parents of preschool children in its parent and family engagement policy under ESEA section 1116(b). Parents must be notified of the school's policy in an understandable and uniform format and, to the extent practicable, provided in a language the parents can understand. For other parent and family engagement activities described in ESEA section 1116, such as the annual meeting or parent training, a school or LEA must either include preschool parents or provide separate activities for those parents, as appropriate. Finally, when an LEA or school is carrying out the Title I parent and family engagement requirements, the LEA or school must provide opportunities for the informed participation of parents and family members (including parents and family members who have limited English proficiency, parents and family members with disabilities, and parents and family members of migratory children), including providing information and school reports required under ESEA section 1111 in a format and, to the extent practicable, in a language such parents understand" (United States 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. February 2024.

### In Summary

The NJDOE presents this guidance as an overview of how districts may maximize their Title IA funds, if applicable, to support preschool-age students. For more comprehensive guidance on the use of Title IA funds for preschool programs, please refer to the United States Department of Education's guidance document entitled, <a href="Serving Preschool">Serving Preschool</a>
Children Through Title I, Part A of the Elementary and Secondary Education Act of 1965, as <a href="Amended, Non Regulatory Guidance">Amended, Non Regulatory Guidance</a>. February 2024. This document provides additional details on how to use Title IA funds to address the needs of early learners.

Additionally, please refer to NJDOE's Maximizing Federal Funds website, which provides information on how braiding different Federal funds can further help meet the needs of students, including early learners. The website contains evidence-based examples and sample scenarios that may spark ideas for enhancing and sustaining activities with significant positive and lasting impacts. By combining various Federal and other funds, LEAs may leverage a comprehensive approach to early childhood educational funding.

As you move forward with implementing the flexibility to support preschool programs with Title IA funds, please contact the Office of Supplemental Educational Programs at <a href="mailto:TitleIA@doe.nj.gov">TitleIA@doe.nj.gov</a> or 609-376-9080 or the Division of Early Childhood Services at <a href="mailto:doearlychild@doe.nj.gov">doearlychild@doe.nj.gov</a> or 609-376-9077, if you have any questions.