March 24, 2015

TO:  Chief School Administrators
     Charter School Lead Persons

FROM: Karen L. Campbell, Director
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RE:  Using Title I, Part A Funds for Preschool Programs

As districts begin developing their 2015-2016 Title I Local Educational Agency Plan, the New Jersey Department of Education (NJDOE) would like to emphasize the flexibility to use Title I funds to support preschool programs. The purpose of Title I, Part A of the Elementary and Secondary Education Act is to “ensure that all children have a fair, equal, and significant opportunity to obtain a high-quality education and reach, at a minimum, proficiency on challenging state academic achievement standards and state academic assessments.” 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. Therefore, the NJDOE encourages districts to maximize the use of their Title I funds to provide programs and services for at-risk preschool children. The following information is provided to assist you in determining how to serve preschool aged children with Title I funds:

**Student Eligibility**

Districts may use their Title I funds to implement a “Title I preschool program” in one of the following settings: school-operated Title I preschool program; district-operated Title I preschool program; or through coordination with other preschool programs, such as Head Start and other community-based providers. Eligible children are all preschool-aged students in a school that operates a Title I schoolwide program. In a Title I targeted assistance program, eligible students are those deemed “at-risk” as determined by multiple, educationally-related, objective criteria, which may include teacher judgment, interviews with parents, and developmentally appropriate measures of child development. Districts may also consider family income as a factor for identifying at-risk preschool aged students. Children meeting any of the following criteria are automatically eligible to participate in a Title I preschool program:

- Participated in Head Start or a Title I preschool program at any time in the prior two years;
- Received services under Part C of Title I (migrant education) in the prior two years;
- Experiencing homelessness, or
• In a local institution for neglected or delinquent children and youth or attending a community-day program for these children.

**Allowable Uses of Title I Funds**

When using Title I 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 I funds should be used to enhance and expand an existing program. However, in cases where an existing preschool program has experienced a decreased budget that has resulted in the termination of programs and services, Title I districts may use their Title I funds to now support such programs and services. For example, one way to use the funds is to support enrichment programs in the summer, or provide an extended day during the school year. Another way to use the funds is to support the family worker to ensure successful outreach efforts.

Primarily, districts should use their Title I funds to extend the number of hours of an existing preschool program, open additional seats in an existing preschool program or improve the programs and services offered in an existing preschool program. Other allowable uses of Title I funds include the cost to rent an adequate facility to host a preschool program or to make minor renovations to an existing facility. In a Title I preschool program, the district may also use the funds to address the cognitive, health, and social-emotional needs of eligible children who are not yet at the state’s mandated grade level for a free public education.

**Additional Considerations**

When using Title I funds for preschool programs, districts must be aware of the following requirements:

• **District’s Title I Plan:** In the annual Title I application, districts must fully articulate the use of Title I funds to support a preschool program.

• **Qualifications for Teachers and Paraprofessionals:**
  1. **Teachers:** Teachers in a Title I Program should hold the highest professional standards for teaching young children, including a baccalaureate degree and a comprehensive education about child development. Per federal legislation [Head Start Act section 648A(a)(2)(A)(i) and (ii)], as of 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.

  2. **Paraprofessionals:** Those working in a Title I preschool program in a targeted assistance program whose salary is paid with Title I funds, and all paraprofessionals working in a Title I Schoolwide program must meet the following requirements:
     • Possess a secondary school diploma or its recognized equivalent; and
     • Completed at least two years of study at an institution of higher education (exclusive of remedial courses); or
     • Earned an associate’s or higher degree; or
     • Met a rigorous standard of quality and have demonstrated — through a formal State (e.g. ETS Parapro) 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)).

- **Title I Parental Notification and Involvement Requirements:** The Title I parental involvement and notification requirements may extend to Title I preschool programs. For instance, in district operated preschool programs, the families of preschool students must be included in the development of the district’s parent involvement policy. Schools operating a Title I preschool program would have to involve the parents of their preschool students in the development of the school-level parent involvement policy, and extend an invitation to preschool parents for the annual Title I parent meeting, as needed. In addition, both district and school operated Title I preschool programs are responsible for addressing the needs of all families, including the families of preschool students, in their family engagement strategies.

The NJDOE presents this guidance as an overview of how districts may maximize their Title I funds to support preschool age students. For more comprehensive guidance on the use of Title I funds for preschool programs, please refer to the United States Department of Education’s non-regulatory guidance document, *Serving Preschool Children Through Title I Part A of the Elementary and Secondary Education Act of 1965, as Amended* (http://www2.ed.gov/policy/elssec/guid/preschoolguidance2012.pdf). This document provides additional details on how to use Title I funds to address the needs of early learners. As you move forward with implementing the flexibility to support preschool programs with Title I funds, please contact the Office of Supplemental Educational Programs at titleone@doe.state.nj or 609-943-4283 or the Division of Early Childhood Education at 609-777-2074, if you have any questions.

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