



# Title I, Part A Program Guide

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for Local Education Agency Title I Coordinators

Division of Student Support and Federal Programs

Office of Federal Programs

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## About this Program Guide

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### Maryland's Title I, Part A Program Guide for Local Education Agency Coordinators

The Maryland State Department of Education (MSDE) provides leadership and technical assistance to Local Education Agencies (LEAs) on the requirements and uses of Title I, Part A (Title I) funds under the Elementary and Secondary Education Act (ESEA) as amended and reauthorized in 2015 under the Every Student Succeeds Act (ESSA).

Additional Resources:

[Maryland State Department of Education Title I, Part A website](#)

This Program Guide for Title I, Part A Improving Basic Programs operated by LEAs is intended to assist LEA Title I Coordinators. The guide is meant to serve as a resource and provide a general overview of the Title I program under ESSA, and regulations and guidance provided by the United States Department of Education (USED).

***This program guide is subject to change as updates in federal or state legislation or guidance become available.***

LEAs are responsible for local program implementation. This resource should be used in conjunction with applicable guidance provided on USED's website. Title I aligns well with and supports **Maryland's Strategic Plan to Transform Education**, by putting the whole child at the center of working collaboratively to support a whole-child approach and promoting high-quality instructional practices. Any questions not addressed in this resource guide should be directed to the Point of Contact (POC) assigned to the LEA by the MSDE's Division of Student Support and Federal Programs.

## Getting Started as a Title I Coordinator

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### **BUILDING CONNECTIONS WITHIN THE LEA AND SCHOOLS**

Title I programming and funding may impact various areas within an LEA. It is important for the Title I Coordinator to develop cooperative relationships with multiple internal LEA departments and schools. This will ensure that Title I programming and funding are coordinated with the appropriate offices responsible for providing required documentation and maintaining compliance.

A Title I Coordinator may interact with the following LEA departments/offices throughout the year, as well as the staff at each Title I served school:

- Finance Office
- Human Resources
- Food Services
- Curriculum and Instruction
- Student Services
- Early Childhood
- Homeless Program
- Title III

### **FISCAL AND PURCHASING/REPORTS**

Working with the finance office, a Title I Coordinator will need to know the following:

- Purchasing process within the LEA for Title I (requisitions and purchase orders)
- Fiscal Reports - Access or a person who can provide the reports monthly for review and monitoring spending throughout the year.

It is imperative that the coordinator be aware of, and be a part of, the process for what purchases are being made with the Title I funds to ensure expenditures are allowable and that funds are properly allocated for salaries, benefits, and other planned activities.

### **LEA AND SCHOOL LEVEL PLANS**

#### **LEA Plan**

In order to become familiar with the LEA's most recent Comprehensive Needs Assessment (CNA) and Improvement Plan, a Title I Coordinator should consider becoming involved in the LEA leadership team and/or strategic/improvement planning team to understand how the LEA can fund its plan with Title I funds. A coordinator that is part of these decisions can assist the planning teams and complete the needs assessment and improvement plan more effectively. Meeting regularly with the teams will foster strong connections and collaboration and assist with monitoring and evaluation of the activities planned for the fiscal year at the LEA level.

### **School Plans**

A Title I Coordinator should read, review, and consider being part of the approval process for all Title I schools' needs assessment/root cause analyses and school-level plans. The Title I Coordinator should become familiar with how schools provide Title I services, identify students for interventions, and how they plan to engage families as partners. A coordinator is recommended to collaborate directly with the school administrators and their school leadership teams (SLT) and/or improvement teams, especially those schools that operate a schoolwide Title I program or those with a federal accountability label (CSI, TSI or ATSI). This involvement will assist with the monitoring and evaluation of the activities planned for the fiscal year at the school level.

## Title I, Part A Overview

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### Title I, Part A – Education for Disadvantaged Youth

Title I under ESSA provides financial assistance to LEAs and schools with high numbers or high percentages of children from low-income families to ensure that all children meet the challenging state academic standards.

[U.S. Department of Education Title I, Part A Information](#)

### TITLE I, PART A PROGRAM ACTIVITIES

There are monthly items that a Title I Coordinator needs to plan, implement, and monitor to effectively administer a successful Title I program throughout the grant cycle (the grant period runs from July 1 to September 30 of the following year). (See Appendix A – Monthly Schedule of Activities). There are many areas to focus on in a Title I program including, but not limited to, programming (instructional and non-academic), fiscal, monitoring, and evaluation. The Year-at-a-Glance is a monthly overview resource and guidance of Title I grant responsibilities that Title I Coordinators may be responsible for throughout the school year.

### Tips for Starting the Year as a New Coordinator

- Review the LEA's current Title I grant application, and all the LEA and schools' needs assessments and improvement plans.
- Become familiar with the accountability status of the LEA and its schools; this will assist in determining planning requirements and needs.
- Meet with school administration and visit schools often to become familiar with their school improvement plans, school programming, Title I staff and certification requirements, procedures for student selection, service delivery models, parent and family engagement, and professional development.
- Contact and schedule consultation meetings with nonpublic schools that are participating in Title I programs to plan and review Title I services.
- Review the LEA's prior year annual program review (APR) feedback. Utilize MSDE's Title I Monitoring Tool to guide organization of documentation files for both the LEA and school level. Keep all current documents that will serve as evidence for each area.
- Become familiar with the LEA's purchasing procedures and with program and object codes. Ask for a list from the LEA's finance office. A Title I Coordinator may be responsible for signing off on Title I purchase requisitions.
- Schedule opportunities per LEA protocol to meet with LEA-level staff and stakeholder groups to coordinate/collaborate on the Title I application and discuss roles and reporting responsibilities, i.e., Human Resources (HR), fiscal, stakeholder input, etc.
- Develop a plan and data collection process for progress monitoring all district-wide initiatives.
- Create topic specific sign-in, agenda, and notes (SAN) or sign-in, agenda, notes, and evaluation (SANE) documents to support the planning and implementation of the Title I Program.



## Title I, Part A Programming Requirements

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The Title I program originated as Title I, Part A of the Elementary and Secondary Education Act of 1965 (ESEA). It was amended in 2015 and was retitled the Every Student Succeeds Act (ESSA). Its primary purpose is to ensure that all children are given the opportunity to be provided with a high-quality education. Title I is the largest federally funded education program for elementary and secondary schools. Title I is also designed to focus on special needs populations and to reduce the gap between advantaged and disadvantaged students.

### PURPOSE AND INTENT

The purpose of Title I is to provide all children significant opportunity to receive a fair, equitable, and high-quality education, and to close educational achievement gaps.

### LEA REQUIREMENTS

#### School Eligibility

Each year in March, the LEA will be provided with instructions and a spreadsheet of their schools in rank order based on their Free and Reduced-price Meal (FaRMS) data. This information should be reviewed carefully. If any changes need to be made (due to a change in enrollment, free and reduced-price meal numbers, school names, and/or grade spans), please submit an amendment request following the instructions provided. The LEA's MSDE Title I POC will facilitate this process with the LEA's Title I Coordinator.

#### Staffing

All teachers and paraprofessionals working in a program (Schoolwide or Targeted Support) supported with Title I funds must meet applicable State licensure requirements.

LEAs that receive Title I funds must provide specific information to parents and families. The law states that the information must be provided by a method accessible to parents, and that the information is in a language that parents understand, whenever practicable. Some of the methods that an LEA can use for the required notices covered in this section include mail, take home letter, parent handbook, and LEA/school websites.

The Title I Coordinator should annually assist the various departments/schools involved to ensure that the parent notice requirements are implemented, and documentation is in the LEA's folders for the monitoring process.

#### Teacher Licensure

In Maryland, the following teacher licenses meet the requirements of ESSA Section 1112(c)(6):

- Initial Professional License (IPL)
- Professional License (PL)
- Advanced Professional License (APL)
- Temporary Professional License (TPL)
- Conditional License (CL)
- Resident Teacher License (RTL)

More information on teacher licensure, including a crosswalk between former certificates and the new license types is available on [MSDE's Educator Licensure](#) web page.

### **Paraprofessional Qualifications**

Paraprofessionals working in a Title I program (Schoolwide or Targeted Assistance), must meet Maryland requirements whether or not they are paid with Title I funds.

The current requirements for paraprofessionals working in a Title I program are:

- Completed at least two years of study at an institution of higher education, or the equivalent of 48 credit hours;
- Obtained an associate's (or higher) degree; or
- Obtained a passing score on the Praxis ParaPro exam and hold a high school diploma or GED.

### **Parents' Right to Know**

ESSA 1112(e)(1)(A) and 34 CFR Part 200.61 (EDGAR) state that at the beginning of the school year, an LEA must notify the parents of each student attending a Title I school that the parents may request, and the LEA will provide the parents on request, information regarding the professional qualifications of the student's classroom teachers, including, at a minimum, the following:

- Whether the teacher has met State qualification and licensing criteria for the grade levels and subject areas in which the teacher provides instruction.
- Whether the teacher is teaching under emergency or other provisional status through which State qualification or licensing criteria have been waived.
- Whether the teacher is teaching in the field of discipline of the certification of the teacher.
- Whether the child is provided services by paraeducators and, if so, their qualifications.

This information should be provided to parents in the fall through a general medium such as a letter or inclusion in a parent handbook.

### **Timely Notice of Teacher Licensure Status**

LEAs must also notify parents if a teacher is instructing in an area outside of their state teaching license, without a license, or if their license has lapsed in a class for four or more consecutive weeks.

A Title I Coordinator should consider working with the Human Resources and Finance offices to ensure that teachers are being assigned properly. This should be checked periodically throughout the school year, and whenever assignments are changed. This is particularly important to check when teachers are on sick or disability leave, maternity leave, or reassigned during the school year. This notice applies to substitute teachers placed in assignments for longer than four weeks throughout the school year.

### **Testing Participation/Transparency**

LEAs receiving Title I, Part A funds are required by ESSA 1112(e)(2)(A)(B) to notify the parents of each student attending any school receiving Title I funds that parents may request information regarding student participation in any assessments mandated by the State under ESSA 1111(b)(2). The LEA will provide the parents on request (and in a timely manner), the information regarding the assessments, including a policy on student participation.

Additionally, the LEA must make widely available through public means (including posting on the LEA website, and where feasible, the website of each school) for each grade served by the LEA, information on each assessment required by the State to comply with ESSA 1111, other assessments required by the State, and assessments required by the LEA, including (where such information is available and feasible to report):

- the subject matter assessed;
- the purpose for which the assessment is designed and used;
- the source of the requirement for the assessment; and
- where such information is available:
  - the amount of time students will spend taking the assessment;
  - the schedule for the assessment; and
  - the time and format for disseminating results.

Any LEA operating a district website must publish the information regarding testing transparency on that website in a clear and easily accessible manner. ESSA 1112(e)(2)(C) states that LEAs not operating a website must determine how to make the information widely available (i.e., distribution of that information to the media, through public agencies, or directly to parents). The information may also be included in student handbooks, published on individual school websites, or shared in letter form.

### **Child Participation in Language Instruction Program**

LEAs that utilize Title I funds or Title III funds to provide a language instruction educational program are required to notify parents within 30 calendar days after the beginning of the LEA's school year if their child is eligible and may participate in the program. For other students identified as Multilingual Learners (ML) entering during the school year, parents must receive notification of language instruction program eligibility within two weeks of registration.

### **Public Comment Period Requirement**

Each LEA must afford a reasonable opportunity for public comment on its application for Federal funds under ESSA and consider such comment prior to submission. ESSA 8306(a)(7).

## ESSA Levels of Evidence

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ESSA requires the use of **evidence-based** interventions (ESSA 8101(21)(A)). This is designed to help increase the impact of educational investments by ensuring that interventions being implemented have proven to be effective at leading to desired outcomes, namely improving student achievement.

Evidence-based interventions are strategies or programs that have evidence to show that they are effective at producing results and improving outcomes for students, staff or families when implemented. The kind of evidence described in ESSA has generally been produced through formal studies and research. Under ESSA, there are four tiers, or levels, of evidence:

**Tier 1 – Strong Evidence:** Supported by one or more well-designed and well-implemented randomized control experimental studies.

**Tier 2 – Moderate Evidence:** Supported by one or more well-designed and well-implemented quasi-experimental studies.

**Tier 3 – Promising Evidence:** Supported by one or more well-designed and well-implemented correlational studies (with statistical controls for selection bias).

**Tier 4 – Demonstrates a Rationale:** Practices that have a well-defined logic model or theory of action, are supported by research, and have some effort underway by an SEA, LEA, or outside research organization to determine their effectiveness.

The Title I Coordinator will work with the LEA's central office and school administration to ensure that evidenced-based interventions, strategies, or approaches are included in the Title I LEA and school plans. Each year, the Title I Coordinator should collaborate with central office and school administration to complete and review the evidence-based strategies being used, including under which level of evidence the strategies fall. File this review with all other Title I documentation; this is required as part of the monitoring process.

More information and resources can be found here:

- [Evidence for ESSA](#)
- [What Works Clearinghouse](#)
- [Ohio Evidence-Based Clearinghouse](#)
- [Pennsylvania Evidence Resource Center](#)
- [Identifying Evidence-based Programs – Mississippi Department of Education](#)
- [National Center on Intensive Intervention](#)

## Title I, Part A Program Design

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Once an LEA determines which schools are eligible for Title I there are two program designs based on poverty percentages that Title I schools can operate. The two program designs are called Targeted Assistance (TAS) or Schoolwide (SW). Program requirements as outlined in ESSA will determine which program a school may operate.

### SCHOOLWIDE PROGRAM

Title I schools may serve students through a schoolwide program (SW). A schoolwide program is a comprehensive reform strategy designed to upgrade the entire educational program for all students in a school. (ESSA, Sections 1114 and 1119.) A school must plan to implement a schoolwide program. Schools must have at least 40% of students living in poverty or the school may apply for a waiver through the Maryland State Department of Education if it is below the 40% poverty threshold.

#### Schoolwide Program Requirements, ESSA Section 1114(a) and 1114(b)

1. Meets the qualifications for a schoolwide program or requests a schoolwide waiver if below the 40% poverty threshold.
2. The schoolwide plan is based on one year of planning including a CNA and describes the evidence-based reform strategies the school will be implementing.
3. Schools operating TAS and non-Title I schools may also transition to a schoolwide program on an expedited time frame with technical assistance from the LEA's MSDE Title I, Part A POC.
4. Plan development involves all stakeholders (parents, community members, staff, and administration).
5. The plan includes monitoring and evaluation protocols and processes to measure effectiveness.

#### Process to Implement a Schoolwide Program

##### Step One: Comprehensive Needs Assessment & Root Cause Analysis

A school operating a schoolwide program must conduct a CNA of the entire school to inform its schoolwide plan.

The school must document how it conducted the needs assessment, the results it obtained, and the conclusions it drew from those results through a root cause analysis. ESSA 1114(b)(6).

##### Step Two: Stakeholder Input and Comprehensive Schoolwide Improvement Planning

The data gathered from the CNA is used to develop a comprehensive plan with SMART goals and supporting strategies identifying how the school will improve academic achievement and address the identified needs and priorities of the school, particularly the lowest achieving students. The required components of a schoolwide plan are found in ESSA 1114(b) and [Supporting School Reform by Leveraging Federal Funds in a Schoolwide Program](#).

An eligible school operating a schoolwide program must develop a comprehensive plan that:

- Is developed during a one-year planning period, unless the LEA and school determine that less time is needed (See Abbreviated Process on page 26).
- Is developed with input from stakeholders (parents, families, community members, and individuals who will carry out the schoolwide plan).
- Must be regularly monitored and revised as necessary based on student needs.
- Is publicly available, is in an understandable and uniform format, and is provided in a language that the parents can understand (where practicable).
- If appropriate and applicable, a schoolwide plan should be developed in coordination and integration with other Federal, State, and local services, resources, and programs such as programs supported under ESSA, i.e. McKinney-Vento, violence prevention programs, nutrition programs, housing programs, Head Start programs, adult education and career technical education programs, and schools implementing comprehensive support and improvement activities or targeted support and improvement activities under ESSA 1111(d).
- Includes a description of the strategies that will be implemented to address the school's priorities and how the strategies will:
  - Address the needs of, and provide opportunities, for all children;
  - Use evidence-based methods and instructional strategies that strengthen the academic program, increase the amount and quality of learning time, and help provide an enriched and accelerated curriculum.

**Additional information for planning:**

Schoolwide plans may include more than reading and math interventions. The term “well-rounded education” is used throughout ESSA. Additional strategies to provide a well-rounded education and upgrade the entire educational program may include: (ESSA 1114(b)(7)(iii)(I-V))

1. **Nonacademic support** - Counseling, school-based mental health programs, specialized instructional support services, and mentoring services to improve students' skills in order for them to improve in academic subject areas;
2. **College and career readiness** - Preparation for and awareness of opportunities for postsecondary education and the workforce, which may include career and technical education programs and broadening secondary school students' access to coursework to earn postsecondary credit while still in high school (such as Advanced Placement, International Baccalaureate, dual or concurrent enrollment, or early college high schools).
3. **Dual or concurrent enrollment programs** - High schools may use Title I funds for the cost of dual or concurrent enrollment programs including training teachers, joint professional development for teachers in collaboration with career and technical educators and educators from institutions of higher education, where appropriate, for the purpose of integrating rigorous academics in such program; tuition, fees, books and materials, and transportation. (ESSA 1114(e)).
4. **Behavioral interventions and preventive services** - Implementation of a schoolwide tiered model to prevent and address problem behavior, and early intervening services, coordinated with similar activities and services carried out under the IDEA (20 USC 1400 et seq.);

5. **Teacher recruitment, retention, and development** - Professional development and other activities for teachers, paraprofessionals, and other school personnel to improve instruction and use of data from academic assessments, and to recruit and retain effective teachers, particularly in high need subjects;
6. **Preschool transitions** - Strategies for assisting preschool children in the transition from early childhood education programs to local elementary school programs.
7. **Gifted and Talented** – If part of the Schoolwide plan, services to support gifted and talented students (staff development, supplies, supplemental MOI, etc.) may be funded using Title I.

**All Title I schoolwide program plans must be developed based on the following four components:**

1. Comprehensive Needs Assessment
2. Schoolwide reform strategies developed with stakeholder input
3. Evidence-based activities to ensure that all students experiencing difficulty mastering the proficient or advanced levels of academic achievement standards are provided with effective, timely additional assistance.
4. Coordination and integration of federal, state and local services and programs. The school plan must document that it has met the intent and purpose of each program where funds are consolidated if it chooses to consolidate funds from Title I, Part A and other federal education program funds and resources without maintaining separate fiscal accounting records by program or meeting most statutory requirements of those programs (ESSA 1114(a)(3)(C)). This is often referred to as Schoolwide pooling. More information regarding Schoolwide pooling and Coordination of funds can be found in the section *Title I, Part A Coordination*.

Step Three: Schoolwide Program Evaluation

ESSA 1114(b)(3) states that the plan and its implementation shall be regularly monitored and revised as necessary based on student needs to ensure that all students are provided opportunities to meet Maryland's challenging academic standards and ensure continuous improvement. 34 CFR 200.26(c) explains that any revisions to the plan should be based on the results of the evaluation.

A school operating a schoolwide program must:

- Annually evaluate the implementation of, and results achieved by, the schoolwide improvement plan using data from annual state assessments and other indicators of academic achievement.
- Determine whether the schoolwide plan has been effective in increasing the achievement of students in meeting the state's academic standards, particularly those who are failing, or most at risk of failing.
- Revise the plan, as necessary, based on the results of the evaluation, to ensure continuous improvement of students in the schoolwide program.

The Title I Coordinator may collaborate with and provide guidance to school principals, staff, and stakeholders through the evaluation process throughout the year to monitor and assess progress. This may be accomplished through a combination of school leadership teams (SLT), School Improvement Teams (SIT), Instructional Leadership Teams (ILT), staff meetings, and parent meetings. A final annual evaluation should be conducted at the end of the school year for any revisions and updates for the upcoming school year.

Guiding questions:

- What went well during the last year?
- What was planned but not implemented?

- What activities/strategies/initiatives got the results needed to impact student achievement?
- What are the implications for next year?

### **Examples of Effective Schoolwide Program Design**

The Title I Coordinator may work with the school administration and staff of the schoolwide eligible school to develop an effective program design. The program design of a schoolwide program should reflect evidence-based reform strategies that are directly aligned with the findings of the Comprehensive Needs Assessment. The program design may vary to meet the different needs of grade levels and content areas in the school. All federal, state, and local resources (staff, materials, labs, computers, professional development, etc.) must be coordinated to improve student achievement. Title I should not be the only funding source for the schoolwide program. The following examples may be included in a school's program design.

Note: This is not intended to be an exhaustive list:

1. Specific academic, evidence-based models aligned with the school's needs assessment that provide early intervention strategies.
2. Instructional coaches to model effective instruction; provide on-going professional development; assist in strengthening lesson plans to address state academic standards and provide guidance on curriculum alignment.
3. Technology specialist to collaborate with classroom teachers on using a variety of strategies to enhance student learning by integrating technology.
4. Science/math lab teacher to develop hands-on activities and experiments to enhance/expand instruction.
5. Extended kindergarten to provide early intervention that aligns with primary instruction.
6. Total school restructuring efforts based on evidence-based process models that are goal oriented and based on setting high expectations.
7. Software programs aligned with student performance standards and that address skill gaps.
8. Parent liaison to train teachers and parents, develop community partnerships, and coordinate with family literacy programs and other community organizations to help support the instructional and social-emotional needs of students.
9. Extended learning opportunities such as: summer school, expanded or extended day programs (before or after school hours).
10. Classroom programs or evidence-based models that improve students' academic achievement.

### **Delivery of Services (ESSA 1114(d))**

ESSA allows for the delivery of services in a schoolwide program by non-profit or for-profit external providers with expertise in using evidence-based or other effective strategies to improve student achievement.



## **YEAR-LONG PLANNING PROCESS TO TRANSITION FROM A TITLE I TARGETED ASSISTANCE PROGRAM (TAS) TO A TITLE I SCHOOLWIDE (SW) PROGRAM**

This guidance addresses the yearlong planning process to transition a Title I Targeted Assistance (TAS) Program to a Title I Schoolwide (SW) Program. In consultation with your LEA and MSDE Title I POC, the procedures listed may be used for a current TAS program to transition to a SW program beginning in the next school year.

### **Overview**

Schools operating a TAS program may consider planning to operate a SW program to implement comprehensive schoolwide reforms and needed interventions for the entire school. Transitioning to a SW program provides schools with the flexibility to address the needs of all staff, students (particularly those who are low-performing), and their families, as well as opportunities to explore how to most effectively utilize federal, state, and local funds in order to implement evidence-based schoolwide reforms that raise the academic performance throughout the school.

In addition, operation of a SW program offers schools the opportunity to improve students' skills through programs and services such as counseling; school-based mental health programs; career and technical educational programs; coursework for postsecondary credit; schoolwide tiered models to address effective behavioral support; professional development for teachers, paraprofessionals and other school personnel; and transitional services from early childhood education to elementary school programs, and other transitions from elementary school to middle school, and middle school to high school.

### **LEA & MSDE Consultation Process**

In accordance with the ESSA Section 1114, the steps for a Maryland school operating a TAS program electing to transition to a SW program using the yearlong planning process are as follows:

The LEA discusses with their MSDE POC the school(s) interested in transitioning from a TAS program to a SW program and provides a rationale for each school that explains why the school is ready to transition to a SW program.

The following topics should be discussed:

1. The LEA will discuss evidence that the school(s) being proposed meet the 40% poverty threshold to become a SW program (ESSA, Section 1114 (a)(1)(A).

**(Note: If the 40% poverty threshold is not met, the LEA must request a waiver from MSDE as described in ESSA, Section 1114 (a)(1)(B))**

2. The LEA should discuss a rationale for each school it proposes that explains why the school is ready to plan and transition to a Schoolwide program. The following topics can be discussed:
  - CNA
  - Schoolwide Plan
  - Address all four SW Plan Components - CNA, school wide reform strategies developed with input from stakeholders, evidence-based activities leading to mastery of academic standards, and coordination and integration of funding and services.
  - The plan must include the names and positions of the planning team, SAN/SANE, and demonstrate meaningful involvement of stakeholders in its development. (1114(b)).
  - Assessment data

- Verification that all teachers and paraprofessionals will meet state licensure and qualification requirements.

### **LEA Letter of Intent**

1. The LEA submits a letter of intent to the MSDE Title I Director for each proposed school to begin planning to transition to a SW program for the start of the next school year (including data and rationale to demonstrate readiness to plan) by October 30.

The letter should provide:

- a. A rationale explaining why becoming SW will be in the best interests of all students, especially students most at risk of failing to meet State academic standards and address the items under Step 2 under Consultation Process
  - b. A proposed planning process and timeline
  - c. The School Name, MSDE ID Number, Percent of poverty, CSI or ATSI status (if applicable)
  - d. Academic and Attendance Data
  - e. Verification that all teachers and paraprofessionals will meet state licensure and qualification requirements. Include a process for meeting this requirement if any teachers or paraprofessionals do not meet this requirement (if applicable).
2. MSDE will send a letter to the LEA Title I Coordinator acknowledging the LEA's intent to begin a yearlong planning process to transition the TAS program to a SW program.

### **Year Long Action Steps**

1. With the support of the LEA and all required members of the planning team, develop a transition plan and timeline, which includes all four SW components and submit it to the MSDE Title I POC.
2. The MSDE Title I POC will coordinate a mid-year check in and documentation review.
3. The LEA and school will provide professional learning opportunities, and oversight from the LEA. The TAS program implements the transition plan and maintains documentation during the year of planning to transition to a SW program.
4. The midyear checkin with the MSDE Title I POC will occur.
5. The TAS presents to the LEA documentation demonstrating the implementation of their transition plan (including evidence of stakeholder input) and readiness to transition to the LEA during an internal review of the documentation.

### **LEA Documentation Review Process**

1. MSDE will coordinate with the LEA Title I Coordinator for the documentation review meeting to take place with the LEA Title I Office and MSDE by March 31.
2. Before the meeting, the LEA will submit to MSDE no later than April 15 of the current school year, each school's written documentation that demonstrates the status of implementation of their transition plan including:
  - A written statement signed by the local Title I Coordinator and the school's principal, with a confirmation that the school is ready to become a SW program.
  - A draft of the CNA and Title I Schoolwide Plan or the timeline for completion of the CNA and improvement plan.
  - Verification that all teachers and paraprofessionals will meet state licensure and/or eligibility requirements.

3. If the school(s) are eligible for transitioning to Schoolwide status, MSDE will provide a letter to the LEA that supports the proposed school(s) becoming SW beginning in the next school year. MSDE may provide recommendations for implementation enhancements or additional planning and implementation requirements.
4. If there is evidence that the implementation plan, based on a documentation review, does not meet evidence of readiness, MSDE may recommend that a school not implement a SW program.

### **Abbreviated (Less Than One Year) Schoolwide Planning Process**

This guidance addresses an abbreviated process to transition to a Title I SW program. The procedures listed may be used for a current Title I TAS Program to transition to a Title I SW program *and* for a newly entering non-Title I School to enter Title I status as a SW program beginning in the next school year.

#### **Overview**

Schools operating a TAS program and non-Title I schools may choose to operate a SW program to implement comprehensive schoolwide reforms and needed interventions for the entire school. Transitioning to a SW program provides schools with the flexibility to address the needs of all staff, students (particularly those who are low-performing), and their families, as well as opportunities to explore how to most effectively utilize federal, state, and local funds to implement evidence-based schoolwide reforms that raise the academic performance throughout the school.

In addition, operation of a SW program offers schools the opportunity to improve students' skills through programs and services such as counseling; school-based mental health programs; career and technical educational programs; coursework for postsecondary credit; schoolwide tiered models to address effective behavioral support; professional development for teachers, paraprofessionals and other school personnel; and transitional services from early childhood education to elementary school programs, and other transitions from elementary school to middle school, and middle school to high school.

#### **LEA and MSDE Consultation Process**

1. The LEA Title I Coordinator discusses with their MSDE Title I POC in a technical assistance meeting their intent regarding the school(s) that the LEA would like to become SW in the next school year. The LEA may propose an existing TAS program to transition to a SW program for the next school year. (No later than March 1 of the current school year).
2. For a current TAS school, the LEA will discuss evidence that the school(s) being proposed meet the 40% poverty threshold to become a SW program (ESSA, Section 1114 (a)(1)(A).
  - a. (Note: If the 40% poverty threshold is not met, the LEA must request a waiver from MSDE as described in ESSA, Section 1114 (a)(1)(B))
3. The LEA should discuss a rationale for each school it proposes that explains why the school is ready to plan and transition to a Schoolwide program. The following topics can be discussed:
  - CNA
  - Schoolwide Plan
  - Address all four SW Plan Components - CNA, school wide reform strategies developed with input from stakeholders, evidence-based activities leading to mastery of academic standards, and coordination and integration of funding and services.
  - The plan must include the names and positions of the planning team, SAN/SANE, and demonstrate meaningful involvement of stakeholders in its development. (1114(b)).

- Poverty data—the LEA will discuss evidence that the school(s) being proposed meet the 40% poverty threshold to become a Schoolwide Program (ESSA, Section 1114 (a)(1)(A). (Note: If the 40% poverty threshold is not met, the LEA must request a waiver from MSDE as described in ESSA, Section 1114 (a)(1)(B))
- Assessment data
- Verification that all teachers and paraprofessionals meet state licensure and qualification requirements.

### **LEA Letter of Intent**

1. The LEA submits a letter of intent for each proposed school to begin planning to transition to a SW program to the MSDE Title I Director within 14 business days of the technical assistance meeting.
  - a. This letter should provide a rationale about why becoming a SW program will be in the best interests of all students, especially students most at risk of failing to meet State academic standards and address the bulleted Items under Step 2 under the Consultation Process as discussed at the LEA/MSDE technical assistance meeting.
  - b. A proposed planning process and timeline
2. Include School Name, MSDE ID Number, Percent of poverty, CSI or ATSI status (if applicable)
  - a. Academic and Attendance Data
3. MSDE will send a letter to the LEA Title I Coordinator that acknowledges that the LEA may begin the Schoolwide planning process for the identified school(s).
  - a. As part of the planning process, the LEA must consult with all appropriate private schools to determine if equitable services are required to be provided for students attending private schools from the new SW school's attendance area.

### **LEA Documentation Review Process**

1. MSDE will coordinate with the LEA Title I Coordinator for the documentation review meeting to take place with the LEA Title I Office and MSDE by March 31.
2. Timeline for completion of the CNA and improvement plan, if not already completed.
3. Documentation that will be reviewed is listed above under Consultation (1.a and 1.b). The LEA has the discretion to share additional documentation as applicable.
4. Prior to the meeting, the LEA will submit to MSDE each school's written documentation that demonstrates the status of implementation of their transition plan. This documentation must include a written statement signed by the local Title I Coordinator and each school's planning team members with a recommendation that the school is ready to become a SW program (No later than April 15 of the current school year).
5. MSDE will provide a letter to the LEA that acknowledges the proposed school(s) intent to become SW beginning in the next school year. MSDE may provide recommendations for implementation enhancements or additional planning and implementation requirements. If so, these recommendations will be monitored during the school year.
6. If there is evidence that the implementation plan based on a documentation review does not meet evidence of readiness, MSDE may recommend that a school not implement a SW program.

## Skipped Schools

If an LEA wishes to skip a school eligible to be Title I served, the LEA's Title I Coordinator must submit the request in writing to MSDE, addressed to the Title I Director no later than April 30 for the following school year. In the letter, the LEA must state how:

1. The school meets the comparability requirements under ESSA Section 1118(c). In addition, when performing annual comparability calculations, an LEA must treat an otherwise eligible Title I school that is skipped as if it were a Title I school when determining comparability. Note that an LEA would exclude any supplemental state and local funds expended in the school in its comparability calculations.
2. The school receives supplemental funds from State or local sources that it spends according to the requirements is ESSA Sections 1114 or 1115 on programs that meet the intent and purpose of Title I Part A; and
3. The supplemental funds the school spends from other sources equal or exceed the amount it would receive under Title I Part A.

For Code 1 regular schools, the letter should provide a full description of the Title I-like services. These services must be targeted to specific students (Targeted Assistance program) or used to provide instructional reform throughout the school (Schoolwide program). Supplemental state and local funds would be considered "Title I-like" if they meet the intent and purposes of schoolwide or targeted assistance programs. Specifically, supplemental funds would meet the intent of schoolwide programs if:

- They are only allocated to schools that meet the minimum 40% poverty threshold required to operate a schoolwide program
- The funds promote schoolwide reform and upgrade of the entire academic operation of the school
- The funds are used to meet the academic needs of all children in the school, particularly the needs of children who are failing, or most at risk of failing, to meet the state's challenging student academic achievement standards.

Supplemental funds would meet the intent of targeted assistance programs if:

- The funds are used to serve only children who are failing, or most at risk of failing, to meet the state's challenging student academic achievement standards
- The funds provide supplementary services designed to meet the special academic needs of the children who are participating in the program to support their achievement toward meeting the state's student academic achievement standards
- The funds require the use of the state's assessment system to review the effectiveness of the program

Attach documentation in which additional State or local funding was approved for Code 1 schools. (Note: Additional funding for skipped schools must appear as separate fund codes that can be tracked to each skipped school).

For schools identified as Code 20, Code 30 and Code 40, describe the process used to calculate the additional State and local funds to derive the per pupil allocation (PPA) amount.

NOTE: If an LEA skips a school under ESSA Section 1113(b)(1)(D), the LEA is still required to use Title I funds to provide equitable services to eligible students who reside in the attendance area of the skipped school (ESSA Section 1113(b)(2)).

MSDE will respond to the skipped school request within 30 days.

## TARGETED ASSISTANCE PROGRAM

A Title I school that does not qualify for, or if an LEA chooses not to operate, a schoolwide program must operate as a targeted assistance program under ESSA Section 1115(a). Identified students in a targeted assistance program are students identified by the school as most at risk of failing to meet the challenging Maryland academic standards based on multiple educationally related objective criteria that are established by the LEA or school. All services provided by the TAS are considered supplemental or in addition to the core curriculum.

### Targeted Assistance Program Requirements

- Student identification selection
- Evidence-based strategies and methods that will be used
- Coordination of the targeted assistance program with the regular education program, including transition programs for preschool children
- Parent/Family Engagement strategies
- Professional development opportunities for those working with the identified Title I students
- Teacher/paraprofessional qualifications

### Setting Up a Targeted Assistance Program

#### Step One: Program Design

Meet with LEA and school leaders to determine the targeted assistance program design.

#### 1. Identify Needs

Guiding Questions:

- What is the scope/focus?
- Which content areas will the program focus on?
- What service delivery method will be used?

#### 2. Needs Assessment:

A LEA/school must conduct a Comprehensive Needs Assessment (CNA) as part of its accountability process. Check on the status of the LEA and school and its priority needs. Based on these priority needs, the Title I focus area(s) may be determined.

#### 3. Program Plan

The targeted assistance program plan should outline how the school intends to address the identified needs, establish measurable outcomes, define the objective criteria for student eligibility, and identify how and with what frequency, progress will be monitored. The plan should also include assurances that the school will provide an accelerated, high-quality curriculum, minimize the removal of students from the regular classroom during regular school hours, and regularly review student progress and revise the plan as needed to assist students to meet challenging State academic standards.

Step Two: Identifying/Selecting Students

Eligible students are identified by the school as failing, or most at risk of failing, to meet the challenging State academic standards based on multiple objective, educationally-related criteria uniformly applied to all students at each grade level.

1. Student eligibility for services in a targeted assistance Title I school is not restricted to only those students who are economically disadvantaged. LEAs should keep in mind the following regarding the student selection process:
  - a. The selection criteria must be applied to all students at each grade level;
  - b. Multiple criteria must be used to determine eligibility;
  - c. Examples of criteria used for student selection may include reading, writing/language arts, and/or math assessments, report card grades, teacher referrals, etc. Students from preschool through grade two can be selected solely based on criteria such as teacher judgment, interviews with parents, and developmentally appropriate measures;
  - d. The students must be ranked in priority order according to greatest need for services;

Economically disadvantaged, multilingual learners, and migrant students are eligible on the same basis as all other students. Students in these groups may not be excluded just because they are receiving other services;

While students with disabilities may qualify for Title I, a school may decide that the non-Title I services these students are receiving are sufficient to enable those students to meet the State's challenging standards. However, students may receive services from both special education and Title I simultaneously; and

If a new student moves into the LEA, they must be selected and ranked in the same way as the other eligible students receiving services. The student must meet the new school's criteria before receiving services, even if they received services in another school.

Students who are automatically eligible for services include:

- Participants of Head Start or Title I preschool services at any time within the previous two years;
- A child attending a community day program or living in a State or local neglected or delinquent institution;
- A child served in the previous two years under the Migrant Education program; or
- A child who is homeless and attending any school served by the local educational agency.

2. Children are then selected for Title I Services:
  - a. School administration/teachers rank only the eligible students in the focus area identified by the needs of the assessment.
  - b. Developmental checklists or other screening instruments may be substituted for the ranking sheets to assess the needs of kindergarten-grade 2 students more effectively.
  - c. The children who are in greatest need of assistance are provided Title I services. Each school should keep this data on file. The LEA Title I Coordinator should also keep a copy of the school's eligible student data on file.

*Step Three: Implementing Components of a Targeted Assistance Program*

Targeted assistance programs must use Title I funds to help eligible students meet the challenging state academic standards, which may include programs, activities, and academic courses necessary to provide a well-rounded education.

**Components**

- Help provide an accelerated, high-quality curriculum;
- Minimize the removal of students from the regular classroom during regular school hours for instruction provided by Title I;
- Review the progress of eligible students on an ongoing basis and revise the targeted assistance program, if necessary, to provide additional assistance to eligible students to meet State standards;
- Use effective methods and instructional strategies that rely on evidence-based research aligned to ESSA's Levels of Evidence;
- Provide eligible students with extra supports aligned to the school's regular education program, which may include services to assist preschool students in the transition from early childhood education programs to elementary school programs;
- Provide professional development to teachers, principals, other school leaders, paraprofessionals, and, if appropriate, specialized instructional support personnel, and other school personnel who work with eligible students; and
- Implement strategies to increase the engagement of parents and families of eligible participating students.
- If a high school is implementing a targeted assistance program, funds may be used to provide dual or concurrent enrollment program services to eligible children who are identified as having the greatest need for special assistance. High schools may use Title I funds for the cost of dual or concurrent enrollment programs including training teachers, joint professional development for teachers in collaboration with career and technical educators and educators from institutions of higher education, where appropriate, for the purpose of integrating rigorous academics in such program; tuition, fees, books and materials, and transportation. (ESSA 1115(f)).
- If a targeted assistance program wants to provide comprehensive services (e.g., health, nutrition, and other social services) it must ensure that the targeted assistance program only uses Title I, Part A funds for the comprehensive services if the school has (a) engaged in a comprehensive needs assessment, and (b) funds are not reasonably available from other sources to provide such services. (ESSA Section 1115(e)(2)).
- An LEA may choose to use an external provider (nonprofit or for-profit) with expertise in using evidence-based or other effective strategies to deliver services directly to students in its targeted assistance programs.

The Title I Coordinator coordinates programming with the central office and school administration to design the program, staffing, purchase of resources, and scheduling. In a school operating a Title I targeted assistance program, the staff paid with Title I funds must provide Title I services to students selected for Title I services. ESSA Section 1115(d)(2) permits Title I staff also to assume limited duties beyond classroom instruction or that do not benefit Title I students that are assigned to similar personnel who are not paid with Title I funds, provided the time Title I staff spend on such duties is the same proportion of total work time assigned to similar non-Title I funded staff.



Step Four: Monitoring and Evaluation of the Program

Targeted Assistance Programs are expected to be monitored throughout the year and evaluated annually, at a minimum.

Guiding Questions:

- How will the program be monitored?
- When will data be collected and reviewed during the year?
- Does the plan have a clear direction for the school as to what needs to be done when reviewing the data of the students?
- Are the plan, services, and resources having an impact on student growth?
- What is working and what can be improved?

The Title I Coordinator may assist school administration and team with a review of data, the plan, and revision of the targeted assistance plan as needed for the upcoming school year.

**Delivery of Services (ESSA 1115(h))**

ESSA allows for the delivery of services in a targeted assistance program by non-profit or for-profit external providers with expertise in using evidence-based or other effective strategies to improve student achievement.

**DOCUMENTING TITLE I, PART A PROGRAM ACTIVITIES**

The LEA Title I Coordinator is responsible for collecting documents that demonstrate that each activity is accomplished and to show how the funds were spent.

**Ideas for Organizing and Collecting Documents**

1. Set up folders/files (electronically or paper) that align with the MSDE Monitoring Tool. Maintain current documentation that will serve as evidence for the Title I program.
2. Create a filing system to be used at all participating schools (public and nonpublic); consider either electronic folders or a binder/file box with files pre-labeled with necessary sections. Train and provide school administration/Title I staff with a checklist as to what type of documents need to be in each folder. Meet regularly throughout the year to confirm that proper documentation is maintained.
3. Keep current copies of school plans (schoolwide and targeted assistance), SAN(E), Finance documentation, data, staffing lists, updated student lists, parent/family activities, and professional development activities, etc. on file at the LEA office.

## Parent and Family Engagement

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### TITLE I, PART A PARENT AND FAMILY ENGAGEMENT OVERVIEW

Involving families as partners in the education process is critical throughout a child's academic career. When families support learning, children are more successful in school, and school success helps children become successful adults. The LEA and schools must provide opportunities to build the capacity of staff, family, and community members to effectively partner in the planning, implementation, and review of school and LEA Title I programs. The following is an overview of the authorizing statute.

#### [U.S. Department of Education Family and Community Engagement](#)

Any LEA with an allocation of more than \$500,000 must set aside one percent of its allocation to carry out the required parent and family engagement (PFE) activities. At least 90% of the funds set aside for parent and family engagement activities must be distributed to the schools. **In distributing these funds, the LEA must give priority to its high-needs schools**, and this should be demonstrated via the distribution of funds. (ESSA 1116(a)(3)). LEAs determine the criteria for high-need schools. Examples for consideration of high-need schools may include:

- Poverty
- CSI Identification
- ATSI Identification
- Graduation Rate
- Academic Performance
- Special Population(s) such as: Multilingual Learners, Students with Disabilities, Homeless, Migrant, etc.
- Low Attendance Rate
- Schools determined by the LEA Superintendent

LEAs with an allocation of \$500,000 or less are still required to implement the PFE requirements in the statute but are not required to have a specified minimum expenditure.

Title I Parents must be involved in the decisions on how the parent and family engagement funds are allocated for PFE activities/budgets at the LEA and school level. SANE documentation and/or Title I PFE surveys regarding input from families for the usage of these funds must be kept on file annually.

ESSA Section 1116(a)(3)(D) states that funds reserved by the LEA must be used to carry out evidence-based activities and strategies consistent with the LEA PFE policy/plan. Funds must be used for at least one of the following:

1. Supporting programs that reach parents and family members at home, in the community, and at school.
2. Supporting schools and nonprofit organizations in providing professional development for the LEA and school personnel regarding PFE strategies, which may be provided jointly to teachers, principals, other school leaders, specialized instructional support personnel, paraprofessionals, early childhood educators, and parents and family members.

3. Disseminating information on best practices focused on PFE, especially best practices for increasing the engagement of economically disadvantaged parents and family members.
4. Collaborating or providing subgrants to schools to enable schools to collaborate with community-based or other organizations or employers with a record of success in improving and increasing parent and family engagement.
5. Engaging in any other activities and strategies that the LEA determines are appropriate and consistent with the LEA PFE policy/plan.

LEAs providing Title I services to private schools must reserve funds for PFE activities for parents of participating private school children. The funds must be proportionate to the one percent amount reserved for PFE in public schools.

## **PARENT AND FAMILY ENGAGEMENT IN SCHOOLWIDE & TARGETED ASSISTANCE PROGRAMS**

All schools receiving Title I funds, both SW programs and TAS programs, must include a PFE component in their plans. Section 1114(b)(1)(F) of ESSA states that the schools operating a SW program must provide strategies to increase PFE in accordance with ESSA Section 1116. Section 1115(c)(1)(G) of ESSA details the same requirement for schools operating a targeted assistance program.

The characteristics and actions of an effective PFE program should be the same no matter what type of Title I program is in place. The difference between the two will depend on the specific parents receiving services. Title I PFE activities should be geared towards the parents of participating children. All students benefit from funds and services in a SW program; therefore, all parents are the focus of the PFE efforts. In a TAS program, only certain students receive Title I services, meaning that the parents and family members of those students are the ones eligible to receive PFE services.

In a TAS Program, sign-in sheets for events, distribution sheets for materials, etc. should be maintained clearly demonstrating that only TAS Program families received services.

## **LEA LEVEL PARENT AND FAMILY ENGAGEMENT REQUIREMENTS**

### **LEA Parent and Family Engagement Plan/Policy**

Each LEA receiving Title I funds must develop a written PFE policy/plan. The policy/plan is developed jointly, agreed upon, and distributed to parents of participating children (ESSA Section 1116(a)(2)). The policy should be reviewed with parents of participating students and revised as necessary based on their feedback. Documentation of the review and revisions should be on file in the LEA Title I Coordinator's office.

A written LEA PFE policy/plan must establish expectations for PFE and describe how the LEA will:

1. Involve parents in the joint development of the LEA improvement plan outlined in ESSA Section 1112 and the process of school review and improvement under ESSA Section 1116;
2. Provide the coordination, technical assistance and other support necessary to assist participating Title I schools in planning and implementing effective PFE to improve student academic achievement and school performance;
3. Coordinate and integrate PFE strategies with strategies under other early childhood education programs such as Head Start;
4. Conduct an annual evaluation of the content and effectiveness of the PFE policy/plan with parents. The evaluation should include the policy's/plan's ability to improve the academic quality of the schools, including identifying barriers to greater participation of parents, the needs of parents and family members to assist with the learning of their children, and strategies to support successful school and family interactions. Parents should be invited to design strategies for more effective PFE. Particular

attention should be given to parents who are economically disadvantaged, have disabilities, are Multilingual Learners, have limited literacy, or are of any racial or ethnic minority background;

5. Use the results of the annual evaluation described in (4) above to design “evidence-based strategies” for more effective parental involvement. The LEA must also revise the PFE policy/plan, if needed based on the results of the evaluation (ESSA Section 1116(a)(2)); and
6. Involve parents in the activities of schools receiving Title I, Part A funds. ESSA Section 1116(a)(2)(F) gives LEAs the option of creating a parent advisory board comprised of a sufficient number and representative group of parents or family members served by the local educational agency to adequately represent the needs of the population served by such agency for the purposes of developing, revising, and reviewing the PFE policy/plan.

### **Annual Evaluation**

The effectiveness of the LEA’s PFE policy/plan and PFE activities must be reviewed every year. The evaluation will determine whether:

- The academic quality of the LEA has improved.
- Parent participation has increased.
- Barriers exist that hinder greater participation by parents.

The evaluation may be conducted through an electronic or written survey, a telephone survey, or in person. In addition to summarizing and documenting the evaluation findings, the LEA must document how the findings will be used to improve the parent and family engagement program.

At either the end of the school year or early into the new school year, the Title I Coordinator should work with LEA staff, parents, and family members to annually review and update the LEA’s PFE policy/plan.

### **SCHOOL LEVEL PARENT AND FAMILY ENGAGEMENT REQUIREMENTS**

Schools in the LEA that receive Title I funds must fulfill annually the following school-level PFE requirements. Title I Coordinators should work with the school level administration and pertinent staff to complete and maintain the documentation in the school and LEA Title I files.

#### **School Parent and Family Engagement Plan**

Title I schools are to develop jointly with parents a School-Level PFE Plan. Once developed, it should be annually reviewed and updated as needed.

#### **Home-School Compacts**

Each school served by Title I is required to develop, with parent and family member input, a home-school compact. The compact describes how the school staff, students, and parents and family members will share the responsibility for improved student achievement. At the elementary school level, ESSA 1116(d)(2)(A) requires that the compact be discussed at least annually at parent-teacher conferences. The discussion should include how the compact relates to the individual student’s achievement.

### **Title I Annual Meeting**

Under ESSA Section 1116(c), each school served by Title I shall:

1. Convene an annual meeting, at a convenient time, to which all parents of participating children shall be invited and encouraged to attend, to inform parents of their school's participation under Title I, Part A and to explain the law's requirements and the right of parents to be involved; and
2. Offer a flexible number of meetings, such as meetings in the morning or evening, and may provide, with Title I, Part A funds, transportation, childcare, interpretation, translation, or home visits, as such services relate to Title I parental involvement and building the capacity of families.

[Appendix E: Parent & Family Engagement Checklists](#)

## Title I, Part A Fiscal

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### TITLE I, PART A BUDGET OVERVIEW

A Title I Coordinator will work closely with the LEA's Finance Office to ensure that the spending of federal funds follows federal, state, and LEA regulations and/or policies. It is important that administration, program, and fiscal staff at a LEA work together to determine the process and timelines for allocating, budgeting, obligating, and expending funds and the process for communicating any changes that may occur during the year. A coordinator should be familiar with all fiscal grant management practices. It is imperative that the Title I, Part A budget align with the LEA and school level Title I plans to support the supplemental initiatives to impact student achievement.

[Maryland State Department of Education Grants Administration and Compliance](#)

### Ideas for Organizing and Collecting Fiscal Documents

1. Set up fiscal folders and maintain information that demonstrates the amount of the Title I funds, how the LEA used the funds, and the costs associated for initiatives.
2. Maintain all payroll records, purchase orders, invoices, inventory lists, and signed contracts that describe the services or items provided during the fiscal year. Make sure everything is signed, dated, and includes the school's name.
3. Maintain a spreadsheet that documents all personnel funded out of Title I.
4. Maintain all LEA and school level fiscal records for the current year and the preceding three years. Check the LEA's board policy on records retention.

### TITLE I, PART A THREE FISCAL TESTS

There are three fiscal tests that must be in place prior to spending any of the LEA's Title I, Part A funds. These tests were put into place to ensure that Title I funds are used in ways that align with the original purpose and intent of the grant and are not utilized to support programs that would, in the absence of Title I, Part A funds, be paid out of the LEA's state or local funds. The three fiscal tests require an LEA to demonstrate the following:

1. Maintenance of Effort (MOE) – ESSA Section 1118(a)
2. Comparability – ESSA Section 1118(c)
3. Supplement, not Supplant (SNS) – ESSA Section 1118(b)

### Maintenance of Effort

Maintenance of Effort (MOE) is an LEA-level test that determines whether an LEA is providing a consistent level of financial support to its public schools from year to year. This rule ensures that districts do not use Title I funds to shore up reductions in state and local support for public education. The test determines whether in the preceding fiscal year, an LEA has spent at least 90% of the amount spent the year before (the second preceding fiscal year), either on a per student basis or in aggregate. This calculation is done annually. An LEA that fails to meet MOE twice during a five-year period will be penalized by having its Title I allocation reduced by the percentage below the 90% threshold that expenditures fall short.

## Comparability

LEAs must demonstrate that they use state and local funds to provide services to Title I schools comparable to services provided to non-Title I schools. Comparability is an indication that the LEA is using Title I funds to supplement not supplant other funding sources. LEAs are notified annually in October that they must submit a comparability report and meet comparability requirements by December 1. If an LEA is unable to meet comparability requirements, please contact your MSDE point of contact to request technical assistance.

For more detailed information on Maintenance of Effort and Comparability, please refer to the guidance below.

[U.S. Department of Education Title I Fiscal Issues Non-Regulatory Guidance](#)

## Supplement Not Supplant

An LEA receiving Title I funds must continue to use its Title I funds only to supplement, and not supplant, the funds that would be made available from state and local sources in the absence of such Federal funds.

A key step for an LEA to be compliant with the Title I supplement, not supplant (SNS) requirement is that the LEA must show that its methodology to allocate state and local funds to schools results in each Title I school receiving all of the state and local funds it would otherwise receive if it were not receiving Title I, Part A funds. This is often referred to as being "Title I neutral." An LEA may use a single or combination of methodologies to allocate State and local funds to its schools.

In addition to a methodology for SNS, each LEA must have a corrective action plan or process in place to come into compliance with SNS requirements should the LEA be found to be out of compliance.

MSDE recommends that the methodology be posted to the LEA's website. (ESSA Section 8304(a)(3)).

[U.S. Department of Education Title I Supplement Not Supplant Non-Regulatory Guidance](#)

## ALLOWABLE ACTIVITIES

Title I-funded activities must be evidence-based and meet the ESSA Levels of Evidence. Information on ESSA levels of evidence including resources for identifying ESSA levels of evidence may be found in the [ESSA Levels of Evidence](#) section.

All expenditure(s) must be **reasonable, allowable, and necessary**. Use good common sense when making expenditure and obligation decisions. The following tables contain examples of allowable and unallowable uses of funds. The activities listed are not exhaustive but serve as a list of ideas that may assist in planning. The allowable activities examples are not intended to be requirements or limit the uses of funds. Other uses of funds that are consistent with Title I requirements are permissible.

When exploring activities, begin by reviewing the goals, strategies and activities identified in the schoolwide or targeted assistance plan(s) of the school(s) and consider aligned and connected activities. MSDE recommends that LEAs and schools work with their stakeholder groups to assist with planning and identifying grant-related activities.

**TABLE OF ALLOWABLE ACTIVITIES\***

Activity Category	Examples of Allowable Activities
<b>Professional Development</b>	<ul style="list-style-type: none"> <li>• Contract services for:               <ul style="list-style-type: none"> <li>○ Training</li> <li>○ Speakers</li> </ul> </li> <li>• Stipend(s) for professional development</li> </ul>
<b>Family and Community Engagement</b>	<ul style="list-style-type: none"> <li>• Materials/supplies for meetings and activities</li> <li>• Hiring a Family and Community Engagement Coordinator</li> </ul>
<b>Student Achievement</b>	<ul style="list-style-type: none"> <li>• Summer school activities, tutoring, supplemental instruction, counseling, etc.</li> <li>• Interventions to address learning loss such as tailored acceleration, high-quality intensive tutoring and summer bridge programs (outside of core instruction)</li> <li>• Interventions to focus on improved literacy and numeracy</li> <li>• Content area supports in career and technical education (CTE), science, technology, engineering, and math (STEM), special education, and multilingual education</li> <li>• Supplies or other supports to remove barriers for students experiencing homelessness</li> </ul>
<b>District-managed Supports and Initiatives</b>	<ul style="list-style-type: none"> <li>• Analysis of assessment data like a district-wide dashboard for use by assessment specialists</li> <li>• Leadership, resources, and guidance</li> <li>• Building and maintaining a cadre of high-quality substitute teachers, including through partnerships with teacher preparation programs</li> </ul>
<b>Graduation and Pathways</b>	<ul style="list-style-type: none"> <li>• Providing college and career pathways that integrate enrollment, support, and success in rigorous academic coursework or career and technical education</li> <li>• Work-based learning and student support services</li> </ul>
<b>Hiring New Positions</b>	<ul style="list-style-type: none"> <li>• Instructional coaches or specialists to provide job-embedded training, classroom observations and embedded support or feedback designed to strengthen the implementation of sustainable improvement strategies</li> <li>• Additional staff to support implementation of new instructional models, students' mental health needs and the implementation of whole child supports</li> </ul> <p><b>Note:</b> A job description must be submitted with the application for MSDE to review and approve.</p>
<b>School-based Wellness Programs</b>	<ul style="list-style-type: none"> <li>• Establishing school-based wellness teams comprised of representatives from administration, teachers, counselors, nursing, and support staff</li> <li>• Increasing availability of mental health services</li> <li>• Creating a trauma-informed school environment that addresses needs of students and staff experiencing symptoms of traumatic stress</li> <li>• Leveraging tools that allow teachers to understand and cultivate students' social and emotional development by measuring school climate, integrating trauma informed learning into instructional practices and design, providing whole child supports, and reducing school exclusions</li> </ul>



Activity Category	Examples of Allowable Activities
<b>Non-Instructional Supports</b>	<ul style="list-style-type: none"> <li>• Implementing an integrated multi-tiered system of supports (MTSS) framework</li> <li>• Establishing early warning indicator (EWI) systems to promote targeted and timely engagement strategies in response to data</li> <li>• Implementing interventions such as high-quality mentor programs, access to instructional coaches, and professional development opportunities to help educators and staff build more equitable and inclusive approaches to discipline</li> </ul> <p><b>NOTE:</b> Activities supported with these funds must be consistent with a school's plan.</p>
<b>Other</b>	<ul style="list-style-type: none"> <li>• MSDE can assist in evaluating the allowability of activities. Please email your MSDE Title I POC for assistance.</li> </ul>

\*This table is not all inclusive.

**UNALLOWABLE ACTIVITIES**

Title I funds cannot be used for the following (\*not an exhaustive list):

- Athletic equipment
- Building construction or maintenance
- Food, except for Family and Community Engagement activities
- Fundraisers
- Furniture
- Office equipment for general use
- Principal/Assistant Principal salaries and other salaries for positions required for the normal safe operation of a school
- Promotional items or merchandise
- School uniforms
- Student incentives, gift cards, gifts, etc.

**BUDGETING AND SPENDING TITLE I, PART A FUNDS**

Once the planning process is completed within the LEA, the coordinator will begin the budgeting process to fund the plan. It is important to allocate funds in the correct budget categories and use the correct category and object codes when completing the budget.

All expenditures must meet **Federal Cost Principles:**

**Allowable**

- Is the cost reasonable and necessary for the program?
- Is the expense in compliance with laws, regulations and grant terms?
- To what extent is the expense allocable to the grant?

- Is the cost adequately documented?
- Is it consistent with guidance that applies to federally funded activities?

**Necessary**

- Necessary costs are those costs that are essential to accomplish the objectives of the grant project. All items requested must be allowable expenditures under the authorizing program statutes, regulations, and rules.
- Funds must first be allowable under Title I statute.
- All goods must be received and all services must be provided or delivered in time to benefit substantially the population being served in the current grant period.
- Is the purchase required to carry out the intent and purpose of the Title I program?
- Is the purchase needed to carry out the program properly?

**Reasonable**

A cost is reasonable if, in its nature and amount, it does not exceed that which would be incurred by a prudent person under the circumstances prevailing at the time the decision was made to incur the cost.

- Consideration: Do sound, reasonable practices support the expenditure?
- Is the purchase consistent with sensible/wise/prudent business practices and of comparable current market value?
- Reasonableness must also consider the quantity of an item to be purchased.

**Allocable**

- Allocable means the good or service can be assigned to an award or cost objective in accordance with the relative benefit achieved.
- Is the expenditure chargeable or assignable in accordance with the relative benefits received?
  - For example, there should be evidence that a Resource Teacher who is budgeted at 75% time is providing 75% of time conducting Title I instruction-related duties.
- If a cost benefits two or more projects, activities, or programs in proportions that can be determined without undue effort or cost, the cost should be allocated to the projects based on the proportional benefit.
- Expenditures should be aligned with generally accepted accounting principles (GAAP), adequately documented, and budgeted within the LEA grant.

For additional information, see [2 CFR 200 Subpart E](#)

Use the budgeting and grants management resource below to assist further with completing the budget.

[Education General Administrative Regulations \(EDGAR\)](#)

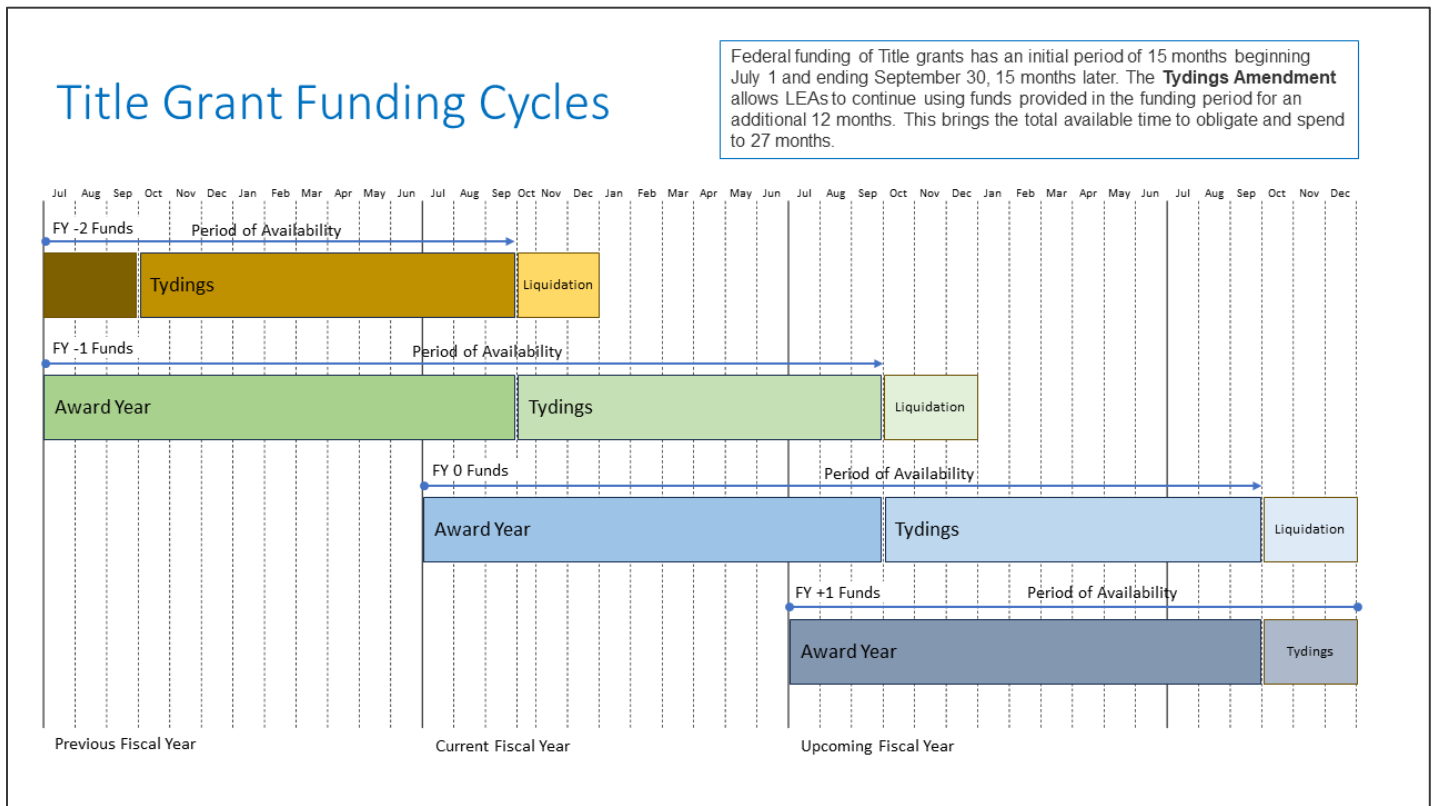
### Five Critical Questions Process

A Title I LEA Coordinator will often be asked to determine the allowability of an item, service, or additional staff. To determine whether Title I funds can be utilized, always apply the basic cost considerations to ensure that the answer is yes to the expenditure. Remember to ask the five critical questions when utilizing Title I funds. More details are in the flowchart linked below.

[Appendix B – Five Critical Questions for Using Title I Funds](#)

### Grant Cycles

Federal Title grants are awarded annually based on Congressional appropriations. A grant's period of availability is 27 months. This period is comprised of an initial award period of 15 months (July 1 to September 30 of the following year) followed by a Tydings period of 12 months (October 1 to September 30 of the following year). Since an LEA may have multiple Title I grants open during their respective periods of availability, it is critical to follow first in first out (FIFO) protocols when charging expenditures against a grant. This will ensure that older funds are spent down in a timely manner to avoid excess carryover, or having funds expire before they can be used. The diagram below illustrates the periods of availability.



### LEA Required Set-Asides

Before allocating Title I funds to schools, LEAs must reserve Title I funds for the following required activities:

- **Equitable services for eligible private school students** - The amount reserved depends on the proportional number of eligible private school students in the LEA. This reservation must be made before any other required or allowable set-asides are reserved.
- **Parent and Family Engagement** - If the LEA receives \$500,000 or more of Title I funds, it must reserve at least one percent, 90% of which must be distributed to schools.
- **Supporting Students Experiencing Homelessness** - To provide students experiencing homelessness with services not ordinarily provided to other Title I students, including funding for the homeless liaison and the excess costs of transportation required under the McKinney-Vento Homeless Education Act. The amount reserved should be based on an annual assessment of homeless children's needs and outcomes, and the reserved funds should be accessible by the LEA McKinney-Vento Liaison.
- **Supporting Neglected and Delinquent Children** - Services for children in local institutions for neglected children and, if appropriate, services for children in local institutions for delinquent children and neglected or delinquent children in community day schools. The amount reserved should be based on the services needed.

### Title I, Part A Allowable Reservations

LEAs also have the option to set aside Title I funds at the LEA level for the following purposes:

- **LEA-Managed Initiatives** - LEAs have the option to reserve Title I funds to implement LEA-managed Title I initiatives. These initiatives are managed at the central office level (rather than the school level) and are designed to improve the achievement of Title I students. LEA-managed initiatives benefit all, or a group of, Title I schools.
- **Foster Care Transportation** - LEAs may reserve funds to cover the additional costs needed to transport children in foster care to their school of origin consistent with Section 1112(c)(5). The amount reserved, if any, should be based on the LEA's needs.
- **Early Childhood Education Programs** - An LEA may choose to reserve an amount from its total allocation to operate a preschool program for eligible children (ESSA Section 1113(c)(5)). The amount reserved, if any, should be based on the LEA's needs.
- **Governance/Administration** - The recommended amount is five percent or less of the LEA's allocation.

### Optional School Improvement-related Reservations

- **School Choice Transportation** - Transportation for students in comprehensive support and improvement (CSI) schools, if the LEA offers these students the option to transfer to another school. The amount reserved may be up to five percent of the total Title I allocation (ESSA Section 1111(d)(1)(D)(v)).
- **Financial Incentives and Rewards to Teachers** - Incentives and rewards to teachers in CSI, TSI, or ATSI schools to attract and retain qualified and effective teachers. An amount of up to five percent may be set aside from Title I funds (ESSA Section 1113(c)(4)).
- **School Improvement Reservation** – An LEA may set aside a portion of its Title I allocation to provide additional support to its schools identified as CSI, ATSI, or TSI. If doing so, the LEA must report the allocation each school receives from this set aside.

### Field Trips

Field trips must be an extension of classroom learning. The field trip should be standards-based and include pre- and post-activities tied to a lesson plan. In the budget narrative, please provide a rationale for how the field trip meets this requirement and is a reasonable and necessary use of Title I funds. The budget narrative should include a cost breakdown to include transportation, number of participants, admission fees, etc.

### TRANSFERABILITY OF FUNDS

An LEA may transfer 100% of its funds from Title II, Part A and Title IV, Part A into Title I, keeping in mind that the funds transferred into Title I are treated and must follow all regulations as Title I funds. All required set-asides and allowable carryover amounts should be calculated. ESSA Section 5103(b)(2). Funds transferred into Title I are also subject to equitable services requirements. ESSA Section 5103(e)(2).

An LEA may not transfer any part of Title I funds to other federal grants. ESSA Section 5103(c)(1).

### [Appendix C – Transferability and Nonpublic School Equitable Services](#)

### CONSOLIDATING FUNDS IN A SCHOOLWIDE PROGRAM

By making systemic changes that knit together services funded from a variety of sources into a comprehensive framework, schools have a better chance of increasing the academic achievement of all students. To encourage this approach and better leverage all available funding, a SW program school has the flexibility to consolidate funds from Title I and other Federal education programs with State and local funds. (ESSA section 1114(a)(1), (3)).

Consolidating various grant funds gives LEA and school leaders a total amount of funding to serve their unique needs within each school building. LEA and school leaders who consolidate schoolwide funds within their schools can focus on and budget according to their collective needs, rather than focusing on and budgeting for individual program grant amounts and requirements. In other words, with consolidation of funds, each activity cost comes from a percentage of the collective pool.

Benefits of consolidating funds include:

- One budget;
- One plan;
- Quicker rate of spending down federal funds;
- Flexibility to allocate all available resources effectively and efficiently;

- A school is not required to meet most of the statutory and regulatory requirements of the specific Federal programs included in the consolidation, provided it meets the intent and purposes of those programs; and
- A school is not required to maintain separate fiscal accounting records by Federal program that identify the specific activities supported by each program's funds.

[Consolidating Schoolwide Funds Guidance](#)

[Federal Register 2004 Volume 69 \(127\)](#) - Notice Authorizing Schoolwide Programs to Consolidate Federal Education Funds and Exempting Them from Complying with Statutory or Regulatory Provisions of Those Programs.

**CARRYOVER LIMITATION**

Under ESSA, no more than 15% of Title I funds allocated to an LEA for any fiscal year may be carried over into the next fiscal year. This percentage limitation does not apply to an LEA that receives a Title I allocation of less than \$50,000.00. If an LEA exceeds the 15% allowable carryover of Title I funds, **the LEA may request a waiver from MSDE once every three years to waive the carryover limitation.**

[U.S. Department of Education Providing Equitable Services Guidance](#)

**INVENTORY AND PROPERTY PURCHASED WITH TITLE I, PART A FUNDS**

All LEAs and Title I Schools in Maryland are responsible for conducting a physical inventory of Title I-funded equipment and sensitive property at least once every two years. Keeping track of the purchases made with the Title I funds may be the responsibility of the Title I Coordinator. Learn what the LEA policy and written procedures are on purchasing equipment and supplies and how they are tracked. There are federal laws that must be followed for purchases made with federal funds for public and nonpublic schools. It is important that Title I equipment and sensitive property (including technology) are labeled as purchased with Title I funds.

**INDIRECT COST**

When the federal grant or federal program language contains "supplement, not supplant" language, the sub-recipient (LEA) may only use the current, approved restricted indirect cost rate. A sub-recipient without an approved rate that chooses to charge indirect costs must use the restricted de minimis rate. ([34 CFR 76.563](#))

The indirect cost rate is applied against the LEA cost, which excludes costs for equipment, transfers, and all but the first \$25,000 of contracts that exceed \$25,000. The adjustment for contracts with a total value greater than \$25,000 is made because the cost of administering a contract is substantially the same regardless of the value of the contract.

The following formula should be used to determine the amount that could be budgeted for indirect cost reimbursement.

$$\frac{\text{Indirect Cost Rate}}{(1.0 + \text{Indirect Cost Rate})} \times (\text{Total Award} - \text{equipment} - \text{contracts*} - \text{transfers})$$

## REQUIREMENTS FOR PERSONNEL PAID OUT OF TITLE I, PART A

As the Title I Coordinator, it is important to know which employees are being paid out of Title I funds. A coordinator is required to maintain appropriate records demonstrating the amount of time they worked on Title I. This includes other staff at the LEA and school level paid completely (100%) or partially from Title I. These records are referred to as time and effort records for partially funded staff and semi-annual certifications for staff 100% funded from Title I and are often requested during a fiscal audit. Time and effort logs must reflect an after-the-fact distribution of the actual activity of the employee. Remember that the salaries and fringe benefits being spent out of the Title I funds must support and be a benefit to the Title I program.

More detailed information can be found in the Uniform Grants Guidance (UGG) 2 CFR 200.430 (g)

### [Standards for Documentation of Personnel Expenses](#)

#### **Charging Salaries to Grants**

2 CFR 200.430(g) requires that employees paid out of grant funds demonstrate the time they spend on the grant's objectives. The LEA may wish to have the employees document their time and effort on the Title I program utilizing either a monthly Personal Activity Report (PAR) or a Semi-Annual Certification Form. These forms along with payroll records provide the documentation needed to demonstrate time and effort.

#### **Fringe Benefits**

The costs of fringe benefits are allowable provided that the benefits are reasonable and are required by law, employee agreement, or an established policy of the LEA. Optional benefits such as additional life insurance, supplemental health plan options, etc. are not allowable and should not be charged to the Federal award. (2 CFR 200.431).

#### **Job Descriptions**

Job descriptions should be on official letterhead and identify how the position supports the Title I program including any specific duties related to Title I.

#### In general:

- Classified positions must work directly on the program, such as a Title I secretary.
- Paras must meet state qualifications.
- Certified positions (unless directly working on the grant, such as a grant manager) must be supplemental and not supplant what is required.
- A position must be supplemental (e.g., not a required position).

#### Examples of allowable positions:

- Program Administrator/Grant Manager
- Professional Development Coordinator – only the portion of the salary dedicated to Title I support
- McKinney-Vento Homeless Liaison
- Title I Teacher/Tutor
- Academic/Instructional coach
- Supplemental Counselor/Social Worker

- Family and Community Engagement Coordinator
- Instructional paraprofessional
- Family and Community Engagement Liaison
- Positive Behavior Intervention and Supports (PBIS)/Multi-tiered System of Supports (MTSS) data coordinator



## ESSA Funding Options and Flexibilities

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Under ESSA, Maryland created a plan to better align local, state, and federal programs to help all students be successful.

MSDE is committed to meaningfully engaging a diverse group of stakeholders through a variety of methods and opportunities to solicit thoughts, opinions, and recommendations concerning provisions in the Maryland state plan. Everyone's input is required to implement a plan that is deeply rooted in the needs of Maryland students.

### STATE LEVEL OPTIONS AND FLEXIBILITIES

#### **Title I, Part A: Section 1003a (School Improvement)**

MSDE must withhold a reservation from its Title I award for school improvement activities. Ninety-five percent of the reservation must be allocated to LEAs that have low performing schools (those in comprehensive or targeted support). The state may provide those funds by formula or competition and only to LEAs with CSI schools.

#### **Title I, Part A: Section 1008 (Schoolwide Threshold)**

MSDE may waive the 40% low-income student threshold for schools that wish to operate schoolwide programming (rather than targeted assistance programming).

### KEY LOCAL LEVEL OPTIONS AND FLEXIBILITIES

- Additional strategies such as well-rounded education are included where it may be possible to use Title I funds in both targeted assistance and schoolwide programs. ESSA Sections 1114(b)(7) and 1115(b)(2)
- LEAs offering public school choice for students in schools identified for comprehensive support and improvement may reserve up to five percent of Title I to provide transportation. ESSA Section 1111(d)(1)(D)
- Prior to allocating Title I funds to schools, LEAs must reserve funds to provide services to students who are homeless whether they attend a Title I school or not. The amount of this reservation should be based on an annual needs assessment. Also, LEAs may spend the reserved funds to employ a homeless liaison and to pay the excess costs of transportation services to homeless students as required under McKinney-Vento. ESSA Section 1113(c)(3)
- LEAs may reserve funds to provide early childhood education programs for Title I eligible children. ESSA Section 1113(c)(5)
- LEAs may lower the poverty threshold from 75% to 50% to serve high schools. ESSA Section 1113(a)
- SW high schools may use Title I funds for the cost of dual or concurrent enrollment programs including training teachers, tuition, fees, books and materials, and transportation. In TAS program high schools, the services are limited to eligible students. ESSA Sections 1114(e) and 1115(f)
- LEAs must reserve one percent for PFE activities. Ninety percent of the one percent must go to Title I schools and priority is given to high-need schools. ESSA Section 1116

## FISCAL FLEXIBILITIES

- The *Supplement, Not Supplant* (SNS) requirement remains in effect for certain federal grants, but the method of determining compliance was modified for Title I SNS (Title I only). Under ESSA, LEAs do not have to show that individual Title I costs are supplemental, but rather implement a methodology to demonstrate that its distribution of State and local funds is “Title I neutral.” ESSA Section 1118(b)
- The *Maintenance of Effort* (MOE) requirement remains but was modified. An LEA may meet MOE by spending at least 90% of its state and local funds through either the combined fiscal effort per student or the aggregate expenditures of the LEA for the preceding fiscal year compared to the second preceding year. The U.S. Department of Education may waive MOE requirements if the LEA suffers from exceptional or uncontrollable circumstances, such as a change in its organizational structure, a natural disaster, or a precipitous decline in its financial resources. ESSA Section 8521
- The transferability option was broadened to allow LEAs to transfer all their Title II-A and Title IV-A funds between those grants and into Title I (A, C, D), Title III-A or Title V-B. If funds are transferred to Title I, the amount for equitable services and other required set-asides must be recalculated. ESSA Section 5103

## Nonpublic Equitable Services

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### Overview

Educational services and other benefits to private school children, teachers, and other educational personnel shall be “equitable” in comparison to services and other benefits for public school children, teachers, families and other educational personnel participating in the program. The services shall be provided in a timely manner.

Some of the Key ESSA requirements on equitable services include:

**Ombudsman:** To help ensure equitable services are provided to private school children, teachers, and families other educational personnel, the state’s education department shall direct the ombudsman (under ESSA Section 1117) to monitor and enforce the equitable services requirements.

**Expenditures:** Expenditures for services to private school children, teachers, and other educational personnel shall be equitable (taking into account the number and the educational needs) to the expenditures for participating public school children.

**Obligation of Funds:** Funds allocated to the LEA for equitable services shall be obligated in the fiscal year for which the funds are received by the agency. The state’s education department shall provide timely notice to the appropriate private school officials of the allocation of funds.

**LEA determinations:** It is important to note that each grant where equitable services apply may have a slightly different process. For example, ESSA Section 1117 describes participation of children enrolled in private schools regarding Title I. Under ESSA Section 1117, state departments of education and LEAs must:

- Determine the number of eligible children enrolled in private schools;
- Provide timely and meaningful consultation with appropriate private school officials, and provide eligible children on an equitable basis (individually or in a combination) services to address their needs (i.e. instructional services, counseling, mentoring, etc.);
- Ensure that teachers and families of children participate, on an equitable basis, in services and activities;
- Ensure expenditures for educational services to eligible private school children shall be equal to the proportion of funds allocated to participating school attendance areas based on the number of children from low-income families who attend private schools. The proportional share of funds shall be determined based on the total amount of funds received by the school/LEA *prior* to any allowable expenditures or transfers by the school/LEA;
- The school/LEA may determine the equitable share each year or every two years.

**Agreements:** The LEA and private school officials shall reach agreement through consultation on how to provide equitable and effective programs for eligible private school children. The results of the agreement shall be transmitted to the ombudsman. In the agreement, the LEA will specify that timely, meaningful consultation did or did not occur.

**Documentation:** LEAs shall maintain records and provide to the state’s department of education a written affirmation signed by officials of each participating private school that the meaningful consultation has occurred. The written affirmation shall provide the option for private school officials to indicate such officials’ belief that timely and meaningful consultation has not occurred or that the program design is not equitable with respect to eligible private school children. If such officials do not provide such affirmation within a

reasonable period of time, the school/LEA shall forward to the state's department of education the documentation that such consultation has, or attempts at such consultation have, taken place.

**Compliance/Disagreement:** A private school official shall have the right to file a complaint with the state's department of education that the consultation with the LEA was not meaningful and timely, did not give due consideration to the views of the private school official, or did not make a decision that treats the private school, or its students equitably as required by law. If the private school official wishes to file a complaint, the private school official shall provide the basis of the noncompliance, and all parties shall provide appropriate documentation to the appropriate officials.

**Action from a state's department of education:** A state's department of education shall provide services directly or through a contract with public or private agencies, organizations, or institutions, if private school officials 1) request the state's education department provide such services directly, and 2) demonstrate that the LEA involved has not met the requirements.

# Supporting Students Experiencing Homelessness Under Title I

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## Overview

The McKinney-Vento Homeless Education Assistance Act (McKinney-Vento) was reauthorized under ESSA. High mobility and interrupted education are characteristics that students who are homeless experience. ESSA strives to ensure their educational stability by providing programming, services, and funding through Title I that cover the ordinary and non-traditional needs of these students. (ESSA Section 1112(c)(5)).

Students Experiencing Homelessness lack fixed regular and adequate nighttime residence and may be living in shelters, transitional housing programs, campgrounds, parks, cars, hotels, substandard housing, or sharing the housing of others due to economic hardship, loss of housing, or a similar reason. Unaccompanied homeless youth, preschoolers, and migrant children in these living arrangements are all included.

## LEA Staff

ESSA requires a Homeless Education Liaison and collaboration with them among the various offices within an LEA.

The Homeless Education Liaison is designated by the superintendent and is responsible for identifying and ensuring the rights of homeless students are extended. Liaisons must also build awareness in the school community and coordinate with MSDE on training, monitoring and federal reporting requirements.

## Best Interest Determination

LEAs must consider "the best interest of the child" when they enroll homeless children in a school. LEAs must presume that remaining in the school of origin is in the student's best interest, except when that is against the wishes of the parent, guardian, or unaccompanied youth. Generally, the LEA must allow the child to continue attending the school of origin, or enroll in the parent's choice of:

1. the school of origin for the duration of homeless and for the remainder of the academic year in which the student moves into permanent housing or,
2. any school which non-homeless students (who live in the same area) are eligible to attend. (This refers to the school "attendance" area in which the homeless student is currently living.)

A school must enroll McKinney-Vento students immediately and cannot delay enrollment because the student is unable to produce school, medical, or residency records. The school must help obtain the student's records from a previous school.

## Transportation for Students Experiencing Homelessness

COMAR 13A.05.09.06 specifies that each LEA must:

1. Promptly provide homeless students with transportation services comparable to the transportation services provided to non-homeless students attending the school that is determined to be in the best interest of the homeless student; and
2. Notify the student and parent of the availability of transportation services, if these services are necessary for the homeless student to attend the school which is in the student's best interest.

If a parent, guardian, or unaccompanied youth request transportation to attend the school of origin, transportation shall be provided:

1. As long as the child or youth attends the school of origin and remains homeless; or

2. Until the end of the current school year, if the child becomes permanently housed during the school year.

If the homeless child or youth no longer resides in the area served by the LEA of origin and the child or youth, though continuing education in the school of origin, begins living in an area served by another LEA:

1. The LEA of origin and the local school system in which the homeless child or youth is living shall agree upon a method to apportion the responsibility and costs for providing the child with transportation to and from the school of origin; and
2. If the LEAs are unable to agree upon a method under §C(1) of this regulation, the responsibility and costs for transportation shall be shared equally.

### **Access to Title I Programming**

Students who are homeless must have access to all of an LEA's Title I programs they need, even if they attend a non-Title I school. This may be accomplished by:

1. Bringing the Title I specialists, tutors, or resources to the non-Title I school, or
2. By providing comparable non-Title I programming for the students in their school.

### **Non-traditional needs**

The needs of homeless students that are not ordinarily covered, such as eyeglasses, school uniforms/clothing, outreach, counseling, or other needs, may be funded through Title I. See the [U.S. Department of Education's Guidance](#) (section M) for more information.

## Supporting Students in Foster Care Under Title I

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### Overview

Similar to McKinney-Vento, rights for students in foster care were added to Title I, Part A of ESSA. High mobility and interrupted education are characteristics that both students in foster care and students who are homeless experience. ESSA strives to ensure their educational stability by providing programming, services, and funding through Title I that cover the ordinary and non-traditional needs of these students. (ESSA Section 1112(b)(6)).

Students in Foster Care are in 24-hour out-of-home care away from their parent/legal guardian, and the Maryland Department of Human Services through local departments of social services (LDSS) has care and placement responsibility.

### LEA Staff

ESSA mandates that each LEA have a Foster Care Point of Contact (POC) and requires this position to collaborate on services among the various offices within the LEA and be responsible for collaborating with social services on best interest determinations and ensuring the enrollment and educational rights of students in foster care by establishing policies and procedures.

The Foster Care POC's responsibilities include:

- Coordinating with the corresponding child welfare agency POC on the implementation of the Title I provisions;
- Leading the development of a process for making the best interest determination;
- Documenting the best interest determination;
- Facilitating the transfer of records and immediate enrollment;
- Facilitating data sharing with the child welfare agencies, consistent with FERPA and other privacy protocols;
- Developing and coordinating local transportation procedures;
- Managing best interest determinations and transportation costs disputes;
- Ensuring that children in foster care are enrolled in and regularly attending school; and
- Providing professional development and training to school staff on the Title I provisions and educational needs of children in foster care, as needed.

The Title I POC may use the Foster Care POC as a resource for developing or enhancing Title I programming to support students in foster care and to inform their decision-making for the use of Title I funds.

### Best Interest Determination

The Fostering Connections to Success and Increasing Adoptions Act of 2008 (Fostering Connections) requires child welfare agencies to develop a plan for ensuring the educational stability of children in foster care to include collaboration with LEAs to ensure that a child entering foster care remains in the school of origin if it is in the child's best interest. Fostering Connections also provides that, if it is in the best interest of the child to transfer from the school of origin, the child must be immediately enrolled in a local school serving the out-of-home placement, even if the required documentation is not readily available.

Under COMAR, the LDSS must ensure school stability for children who are placed in the care and custody of an LDSS and in an out-of-home placement by determining whether it is in the best interests of the child to continue to attend the school the child last attended prior to the most recent change in placement.

### **Transportation Plan for Students in Foster Care**

The LEA has the responsibility to develop a written transportation plan. The LDSS must evaluate the plan to ensure that it is appropriate for the child and enter the plan into the electronic system of record. If inappropriate, the LDSS will assume responsibility for transporting the child to the school of origin. While the LEA develops the child's transportation plan, the LDSS must continue to transport the child. The LEA is responsible for providing the transportation plan to the LDSS with five business days.



## Title I, Part A Monitoring

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### Monitoring Overview

Monitoring the use of Title I funds is a process that MSDE uses to provide support to LEAs with the implementation of the requirements of the program. The intent is to assure that LEAs are meeting the requirements, and if this is not the case, assist them with implementing changes that will help the LEA meet the requirements, while also strengthening their programs. This process is done to help protect LEAs and the State of Maryland from any consequences that may occur from state or federal audits.

MSDE's Division of Student Support and Federal Programs monitors compliance with ESSA programs through the Program Review.

The Title I Coordinator should begin collecting the required documents for monitoring and compliance purposes at the beginning of, and prior to, each fiscal year. Setting up folders either electronically or by hard copy files can assist in making a review go smoothly.

## Title I, Part A Coordination

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### **Title I, Part A Preschool**

An LEA receiving Title I funds may make the decision through a needs assessment process to fund a preschool program. ESSA also requires LEAs receiving Title I funds to develop agreements with Head Start and other early childhood providers to increase coordination.

Additional resources for Title I and Early Learning are available in the following program guide sections:

[ESSA Early Childhood Transition Coordination Guidance](#)

[Funding Early Learning Guidance](#)

### **Participation of Children in Private Schools and Equitable Services**

LEAs receiving Title I funds are obligated to identify and serve eligible at-risk students who reside within their participating attendance zones and attend private schools.

More information regarding the equitable services provision is available here:

[U.S. Department of Education Providing Equitable Services Guidance](#)

[Transferability and Nonpublic Equitable Services](#)

[U.S. Department of Education Non-Regulatory Guidance Fiscal Issues](#)

## Appendices

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This appendix contains the following supplemental documents:

Appendix A – Monthly Schedule of Activities

Appendix B – Five Critical Questions for Using Title I Funds

Appendix C – Transferability and Nonpublic School Equitable Services

Appendix D – ESSA Early Childhood Transition Coordination Guidance

Appendix E – Parent & Family Engagement Checklists

## APPENDIX A – MONTHLY SCHEDULE OF ACTIVITIES

### Title I Program – Suggested List of Activities by Month

#### July

State fiscal years run July 1 to June 30, of the succeeding calendar year. This is different than the grant period which runs July 1 to September 30 of the succeeding calendar year.

- Review LEA and school plans, data, and Title I budget. Check that all required set-aside amounts are allocated in the budget such as equitable services, parent and family engagement, and homeless, including completion of a homeless needs assessment.
- Review and complete any school and nonpublic evaluation of the Title I program.
- Begin program planning including staffing, materials, professional development, and Title I staff, LEA and school leadership team or school improvement team meetings.
- Conduct introductory meetings with HR and Finance to discuss the requirements for the upcoming Comparability Report:
  - Establish participant roles and responsibilities.
  - Establish county specific timelines for completion of the report.
- Set up Title I compliance and program files. Review the documentation process for gathering evidence including the SAN(E) process (the process to document meetings with sign-in sheets, agenda, meeting notes, and an evaluation) with other key offices and school leaders.
- Familiarize and visit Title I-funded Extended Learning Summer programming and any summer professional development sessions.
- Plan the ordering of Title I materials for the upcoming year.
- Inform nonpublic school officials of equitable service amounts.
- Finalize the consultation regarding program design, service delivery models, number of Title I participants and location of services.
- Finalize contracts with Title I staff, third party providers or Memorandums of Understanding (MOU's) with other agencies to provide services.
- Plan districtwide parent and family engagement activities and input meetings for the year. Have Title I schools begin to plan parent and family engagement activities and input meetings for the school year, including a date for a fall annual Title I parent meeting and posting of state assessment information.
- Meet with LEA and school administration to review state assessment data and finalize plans.
- Gather data to assist in the completion of the participation report due in August.

## August

- August 15 is the last date to submit budget/grant amendments for the prior fiscal year.
- Review and/or complete a physical inventory of equipment. Reconcile the results against equipment records for items purchased with federal funds. This should be completed annually.
- Update and distribute Parent Right to Know Letter. (Student handbook, LEA, and school website)
- Continue to hire Title I staff and check on and document proper licensure (as applicable).
- Review and update required board policies/plans (LEA and school level) for Parent and Family Engagement and the McKinney-Vento Act
- Begin the process to finalize all Title I staff with the Human Resources and Finance offices. Update list of all licensed staff and Paraeducators and keep totals and percentages of all staff meeting or not meeting state licensure requirements. Begin the Time and Effort Distribution Documentation: Semi-annual certifications or Personnel Activity Reports (PAR).
- Review and update written local procedures for compliance with the Title I Comparability requirement:
  - Obtain copy of preliminary district-wide school staffing report from Human Resources or budget for instructional allocation to schools (Finance Office).
- Review LEA testing notices to parents including, policy regarding student participation, how to request testing information. Notices should be posted and/or distributed.
- Meet with McKinney-Vento liaison to review annual staff training, activities, support needed to ensure access to Title I services for McKinney-Vento students, and compliance requirements.
- Continue the required on-going consultation of all federally supported services to the nonpublic participating schools for the current school year including private pay, publicly funded and church-exempt schools. Affirmation of Consultation forms should be signed once all required consultation topics have been discussed and agreed upon by the nonpublic school officials.
- Determine nonpublic Title I services using multi-criterion forms.
- Submit participation reports to MSDE.

## September

- Schedule and maintain frequent and regular coordination of the Title I program at the school and LEA level. Include classrooms, all other academic interventions, and other services in the school/community (such as Head Start, preschool, services for children with disabilities and Multilingual Learners (ML), nutrition and housing programs, anti-violence programs, vocational services, career and technical, job training, etc.).
- Establish rank order lists, based on multiple-criteria, of students most at risk of failing in schools with a Title I Targeted Assistance Program (TAS), create Title I staff schedules, begin services.
- Identify date and collection methodologies for gathering data needed to complete comparability calculations (student and staff assignment data or instructional allocations to schools).
- Begin planned extended learning opportunities such as before/after school supplemental programming.
- Cease all spending for the prior fiscal year's grant as of September 30, the end of the grant period. Final invoices/expenditures must be posted to the AFR system no later than November 30. Carryover reports are due December 15. Limit carryover from previous fiscal year's Title I grant to below 15%. LEAs may request a carryover waiver once every three years during the fiscal year in which there were excess funds above the 15% limit.
- Begin the process of organizing required compliance documentation for Title I-served schools in a filing system.
- Begin non-public Title I services at the start of the school year.
- Complete consultation for delivery of services with participating non-public schools by the start of the school year.
- Consider conducting a meeting with the nonpublic administration and nonpublic Title I teacher, as applicable, to provide an overview of programming, fiscal procedures, and compliance.
- Conduct the annual meeting at each Title I-served school to inform parents of the school's participation in Title I and to explain Title I requirements and the right of parents to be involved.
- Finalize Parent and Family Engagement plans and the home-school compact with input from parents/families.
- Share access to all LEA and school plans with families through the LEA website or a parent-friendly printed version.

## October

- Begin monitoring LEA and school improvement plans by visiting schools, attending School Improvement Teams (SIT), district leadership team and School or Instructional Leadership Teams (SLT or ILT). Monitor the completion and impact of strategies and action steps.
- Use the Comparability Report information sent to LEAs to submit the report to MSDE by December 1.
- Submit the annual Carryover Report to MSDE by December 15.
- Meet with Human Resources and Finance representatives to draft the Title I Comparability Report. Make comparability corrections immediately for all schools that are shown to be non-comparable.
- Collect any Time and Effort documentation.
- Request updated monthly fiscal reports to monitor spending. Collaborate with Human Resources and payroll to ensure correct Title I staff members are being paid out of grant.
- Review required board policies/plans (LEA and school level) for Parent and Family Engagement and McKinney-Vento.
- Archive all prior year Title I fiscal and programming documentation for any audit or monitoring purposes. These must be kept for six years.
- Consult with nonpublic officials to determine service satisfaction and student learning. Ensure that all services are being provided to ensure student academic progress.
- Provide updates to nonpublic school(s) to track spending and encourage federal funds to be fully expended in the year in which they are awarded.
- Attend LEA and/or school-level parent and family engagement activities, remind staff to collect notifications/ invitations, agendas, samples of handouts, sign-in sheets and event notes for documentation. RSVPs are also a good practice. The home-school compact is distributed and reviewed with parents/families during parent-teacher conferences.
- Establish a progress monitoring timeline for district-wide initiatives according to the plan submitted with the Title I application.

### **November**

- Review Title I fiscal reports with finance office to monitor spending. Share report with LEA and school administration.
- Meet with HR and Finance to address any outstanding comparability issues. Obtain official LEA approval of report and superintendent's signature on Form A. Maintain all required documentation supporting the development of the Comparability Report. Reports are due by December 1.
- Collect any Time and Effort documentation.
- Revise and update any Targeted Assistance rank order lists for service based on LEA benchmark data.
- Provide additional support to any new schools and schools undergoing the yearlong planning process to become Schoolwide.

### **December**

- Submit Comparability Reports to MSDE by December 1.
- Submit the annual Carryover Report to MSDE by December 15.
- Complete Semi-Annual Report at end of the month (for applicable Title I funded employees) and continue to collect any Time and Effort documentation.
- Review Title I budget reports with the Finance office to monitor spending. Share the budget report with LEA and school administration.
- Review with LEA and school teams the Comprehensive Needs Assessment for planning for the upcoming school year.
- Continue monitoring of LEA and school Title I plans Including parent and family engagement. by visiting schools, attending School Improvement Teams (SIT), District leadership team and School or Instructional Leadership Teams (SLT or ILT). Monitor completion and impact of strategies and action steps.
- Monitor nonpublic services and budgets, visit schools, and consult nonpublic schools as needed.



## January

- Conduct Mid-Year evaluation of Title I programs and continue monitoring of LEA and school plans by reviewing evidence of implementation and data. Attend School Improvement Teams (SIT), District leadership team, School or Instructional Leadership Teams (SLT or ILT), and parent and family engagement meetings. Monitoring completion and impact of Strategies and action steps.
- Collect any Time and Effort documentation.
- Review Title I budget reports with the finance office to monitor spending. Share the budget report with LEA and school administration.
- Engage proactively in LEA-level budget (state and local funds) discussions about staff assignments, equipment, and materials to ensure compliance with Title I comparability requirements.
- Monitor nonpublic services and budgets, visit schools, and consult nonpublic schools as needed.
- Meet with Head Start and other early learning centers such as Judy Centers and preschools to discuss coordination: parents, professional development, and transition for students.
- Collect and review mid-year documentation and data for Title I files from LEA and schools.

## February

- Collect any Time and Effort documentation.
- Consult with your MSDE POC if considering using the abbreviated process to transition a school to a schoolwide program for the following school year.
- Review Title I budget reports with the finance office to monitor spending. Share budget report with LEA and school administration.
- Engage proactively in county-level budget (state and local funds) discussions about staff assignments, equipment, and materials to ensure compliance with Title I comparability requirements.
- Begin to plan for summer extended learning targeting underserved populations (ML, foster, homeless) and students most at risk of not meeting grade level expectations, for example, 9<sup>th</sup> graders who have more than one early warning indicator (in LEAs with Title I High Schools).
- Revise and update any Targeted Assistance rank order lists for service based on LEA benchmark data. If students have made sufficient progress, consider reviewing students for exiting Targeted Assistance.

## March

- Review carefully the school eligibility and rank order information is sent to LEAs based on their free and reduced-price meal data. If any changes need to be made (due to a change in enrollment, free and reduced-price meal numbers, school names and/or grade spans), submit an amendment request.
- Schedule nonpublic consultations to complete by the requested date.
- Submit evidence for planning a new schoolwide program to MSDE, if applicable.
- Collect any Time and Effort documentation.
- Review Title I budget reports with the finance office to monitor spending. Share budget report with LEA and school administration.
- Engage proactively in county-level budget (state and local funds) discussions about staff assignments, equipment, and materials to ensure compliance with Title I comparability requirements.
- Continue parent and family engagement outreach and activities at the LEA and school levels.
- Begin to plan for evaluating the effectiveness of the LEA level Title I Parent and Family Engagement (PFE) Plan/Policy to identify barriers for participation, needs of parents and family members to support learning at home, and strategies to support success school and family interactions
- Begin extended summer learning planning.
- Continue to collect Title I documentation from LEA and schools.

## April

- Conduct parent and family stakeholder meetings and/or surveys, gather results, and include this with the final program evaluation data.
- Submit skipped school requests no later than April 30 to MSDE.
- Collect any Time and Effort documentation.
- Conduct consultation meetings with nonpublic schools.
- Engage proactively in LEA-level budget (state and local funds) discussions about staff assignments, equipment, and materials to ensure compliance with Title I comparability requirements.
- Prepare for the new fiscal year and planning. Verify supplement, not supplant methodology used by the LEA with LEA finance office.
- Monitor any open purchase orders to prepare for end of the year budgets, including nonpublic school spending.
- Begin to gather final evaluation data for all programming paid out of Title I funds, including professional development.
- Finalize extended summer learning, order materials, and complete hiring.
- Verify addresses with out-of-county nonpublic students attending private schools within your LEA.

## **May**

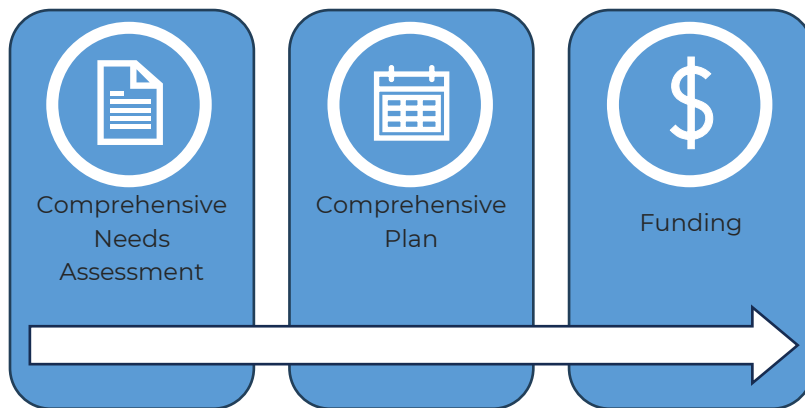
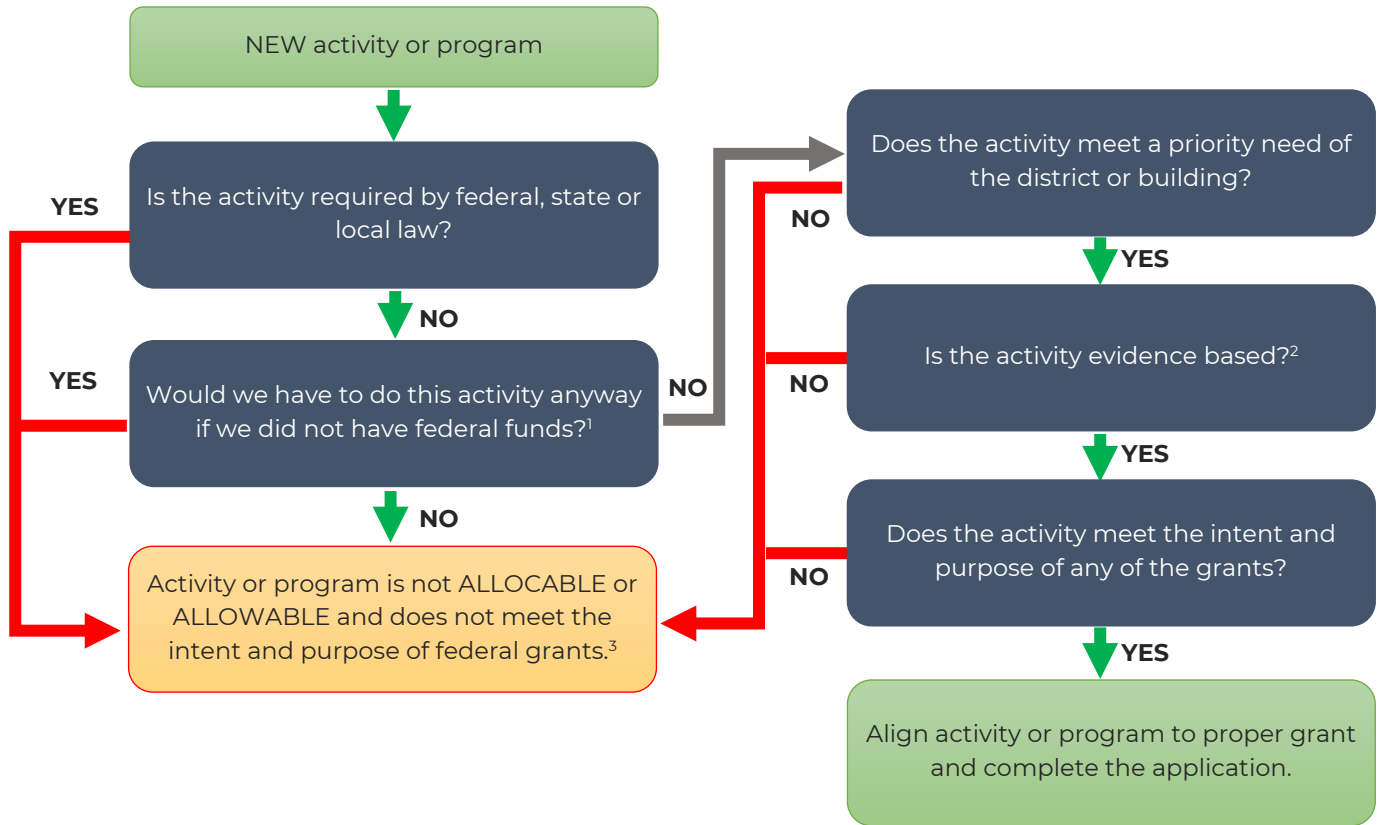
- Compile data and conduct analysis on the effectiveness of Title I services to nonpublic school students to be shared with nonpublic school officials. Use analysis to guide planning for the upcoming school year.
- Collect any Time and Effort documentation.
- Coordinate transitions from pre-K to kindergarten. Meet with local Head Start and preschools in the LEA attendance area.
- Register students for extended summer learning and finalize programming and hiring.
- Continue to meet with LEA and schools to finalize LEA and school plans including PFE plans and home-school compacts.
- Begin to finalize Title I budget reports with the finance office to monitor spending. Meet and share budget report with LEA and school administration to prepare to close the school year.
- Review Title I staffing needs for the upcoming year and collaborate with your McKinney-Vento liaison to conduct a needs assessment/evaluation to determine the amount of Title I homeless set-aside needed for the upcoming school year.
- Communicate with appropriate stakeholders about data needed to complete the Participation Report due mid-August. Collect data in June/July/August.

## **June**

- Complete Semi-Annual Report at end of the month (for applicable Title I-funded employees) and continue to collect any Time and Effort documentation.
- Implement summer extended learning opportunities (if applicable).
- Conduct annual evaluation to determine if services are improving student achievement.
- Review Title I staff needs for upcoming school year.
- Collect all final documentation, including from nonpublic schools and file.
- Update Title I equipment inventory, as appropriate.

**APPENDIX B – FIVE CRITICAL QUESTIONS FOR USING TITLE I FUNDS**

Use this flow chart to determine allowable uses and distribution of Title I funds.



<sup>1</sup>This is a good way to determine if the decision about using federal funds is neutral. Known as the Neutrality Test, this is a measure for determining an LEA’s Supplement, Not Supplant Methodology when making budgeting decisions for what is paid with state and federal funds, and what is supplemental and may be paid with federal funds. If an LEA would be required to do a specific activity or would do an activity due to expectations of community or past practices, then it may not be supplemental.

<sup>2</sup>The activity must be evidence-based if it is an intervention or improvement strategy for Title I. It may be Level 1-4, however, level 4 evidence-based activities require that the district complete a logic model. See [USED Evidence Guidance](#).

<sup>3</sup> If you answered yes to any of the questions above then the activity or program may not be allocable or allowable under federal guidelines and may not meet the intent and purpose of Federal funds. Please contact your MSDE POC for guidance.

## APPENDIX C – TRANSFERABILITY AND NONPUBLIC SCHOOL EQUITABLE SERVICES

### Overview

ESSA Section 5103 allows LEAs flexibility to target Federal funds to programs and activities that most effectively address the LEA’s unique needs. An LEA may transfer all or a portion of the funds allocated to it for a fiscal year to one or more of its other allocations. Such transfers have implications for the amount of funds that must be allocated for nonpublic equitable services.

This section provides guidance on which funds may be transferred, how to initiate a transfer, how to calculate the funding allocation and what to do with carryover funds.

### Allowable Funds to Be Transferred

The table below outlines which funds may be considered for transfer to nonpublic schools for equitable services. Funds transferred from one fund to another fund take on the rules and requirements of the fund to which they are transferred.

Transfer Funds From	Transfer Funds To
Title II-A	Title I Part A, C, or D
Title IV-A	Title II-A
	Title III
	Title IV-A
	Title V-B

### Initiating a transfer of funds with a consultation

Prior to any transfer of funds, the LEA must consult with eligible nonpublic schools that receive equitable services. The consultation must be timely, meaningful, and conducted in accordance with ESSA Section 8503. During consultation, the two parties can reach an agreement on how the LEA will provide equitable and effective programs to eligible nonpublic school students. The LEA and nonpublic school will determine equitable services based on the total amount of funds available to each program after a transfer.

The consultation must address any change in services the nonpublic schools will or will not receive due to the transfer. The LEA must maintain records of the consultation, and both parties must sign off on a written affirmation that meaningful and timely consultation occurred. The written affirmation must provide the nonpublic schools an option to indicate they do not believe timely and meaningful consultation has occurred or that the program design is not equitable for eligible nonpublic schoolchildren. ESSA Section 5103(e)(2).

### Noncompliance and Complaints

If the nonpublic school does not believe the consultation was timely and meaningful, feels the LEA did not give due consideration to the views and needs of the nonpublic school, or believes the decision fails to treat the nonpublic school or its students equitably, the nonpublic school official has the right to file a complaint with MSDE. The signed complaint must include a statement that an LEA has violated a requirement of the Title I statute or regulations with respect to equitable participation, the facts on which the statement is based, and the specific statutory or regulatory requirement(s) allegedly violated. Please refer to the [Equitable Services Complaint Procedures](#) document for details.

### Transfer of Funds

When an LEA transfers funds from Title II-A and/or Title IV-A, the LEA must **recalculate** the total equitable service amount for the nonpublic school for the budget in which the funds were transferred. (ESSA Section 5301(e)(1)). If an LEA transfers a portion of its Title II-A and/or Title IV-A funds, the LEA then must recalculate the equitable service amount for the budget from which and to which the funds were transferred based on the total amount of funds available to each program after the transfer.

**Recalculating for Equitable Services**

There are two ways the LEA needs to recalculate its funds.

**Title I:** Because Title I is funded by the number of students in a service area who are below poverty, the equitable service amount is calculated by dividing the total number of low-income students from the LEA's service area who attend the nonpublic school by the total number of low-income students in the LEA and nonpublic school to determine the percentage of nonpublic school students to total students. This percentage is multiplied by the total allocation to the LEA to determine the equitable service amount.

Formula	Total nonpublic school low-income students in LEA service area / Total number of low-income students (LEA and nonpublic).	= Proportion of nonpublic students	Proportion of nonpublic students x Total amount of funds eligible for transfer	= Equitable Service Amount
Example	10 low-income nonpublic school students / 2498 Total low-income students at LEA	=.004	.004 x \$569,743.36	= 2,280.80

**Set Aside Amounts**

Transferred funds become funds of the program to which they are transferred and are subject to all the rules and requirements of the programs paid for by those funds. Therefore, an LEA must apply the proportional share calculation in ESSA section 1117(a)(4)(A) to any funds transferred into Title I. An LEA must spend transferred funds in accordance with requirements of the receiving program, including statutory set-asides.

In Title I, the nonpublic equitable service amount comes off the top of the total allocation prior to the LEA subtracting its set-asides for the LEA's allocation of Title I.

Several statutory set-asides govern an LEA's use of Title I funds. For example, there are set-asides prescribing the percentages of Title I funds an LEA must spend on parent involvement (minimum should be at or above 1 percent of the allocation if the award is \$500,000 or more). If an LEA reserves funds off the top of its Title I allocation for carrying out Title I parental involvement activities, the LEA also must reserve funds off the top of the nonpublic school's allocation to provide equitable services for families of private school participants.

**Carryover**

If an LEA transfers funds from Title II or Title IV into Title I and does not fully expend the newly calculated equitable service amount in the fiscal year, those unspent funds **could** be carried over in the original grant and transferred back to Title I the following fiscal year. However, the LEA must determine if an extenuating circumstance prevented it from spending the entire amount earmarked for equitable services during the year in which they were awarded. In this case, please reach out to your MSDE Title I POC.

## **APPENDIX D – ESSA EARLY CHILDHOOD TRANSITION COORDINATION GUIDANCE**

ESSA requires LEAs receiving Title I funds to develop agreements with Head Start and other early childhood providers to increase coordination. This guidance document consolidates requirements under ESSA for coordination with early childhood programs and additional requirements and supports for early childhood coordination. Coordinated kindergarten transitions support the goals of Maryland's strategic plan for education, as parents, caregivers and community partners work together with their schools to meet the needs of the whole child and expand quality early learning.

### **Coordination Requirements**

#### **Local Educational Agency Plan – Plan Provisions**

Each LEA's plan shall describe, if applicable, how the LEA will support, coordinate, and integrate services provided under this part 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.

#### **LEA Coordination with Head Start and Other Early Childhood Programs**

Each LEA receiving Title I funds, regardless of whether it operates a Title I preschool program, must develop agreements and carry out the following coordination activities with Head Start and, if feasible, other early childhood programs, including:

- Developing and implementing a systematic procedure for receiving records of preschool children;
- Establishing channels of communication between school staff and their counterparts to facilitate coordination;
- Conducting meetings involving parents, kindergarten or elementary school teachers, and Head Start teachers to discuss the developmental and other needs of children;
- Organizing and participating in joint transition-related training of school, Head Start, and where appropriate, other early childhood education program staff;
- Linking the educational services provided by the LEA with those provided by Head Start agencies.

ESSA places special emphasis on early learning and prekindergarten education. Improving early learning programs aligns with the strategies of Maryland's Strategic Plan, [\*Maryland Transforms\*](#), to create partnerships and expand quality early learning.

### **Title I, Part A – Needs Assessment and Planning**

The use of Title I funds for a preschool program is a local decision based on a needs assessment of the LEA and its community. If the LEA decides to use federal funds, such as Title I, for preschool or other early learning activities, these activities should support the objectives and goals of the LEA. These efforts also should be included in the LEA plan and the school-level Title I programs. (ESSA, Sec. 1114 (c)).

## Funding Preschool Programs with Title I

An LEA or school that receives Title I funds may use the funds to support an LEA-operated preschool program or school-operated preschool program or for coordination with other preschool programs, based on the needs of its eligible students and the most effective use of those funds. (ESSA, Sec. 1113 (c)(5)).

Title I preschool programs are intended to assist children most at risk of failing to meet the state's challenging learning standards based on multiple, educationally related, objective criteria.

Certain children are "automatically eligible" to participate in a Title I preschool program (the LEA or school need not identify the child as most at risk of failing to meet the state's learning standards), including:

- Children who participated in Head Start, received services supported by the Comprehensive Literacy State Development Grant program within Literacy Education for All, Results for the Nation (LEARN) (formerly known as Striving Readers Comprehensive Literacy Program) or attended a Title I, Part A preschool program at any time in the prior two years;
- Children who received services under Title I, Part C (migrant education) in the prior two years;
- Preschool-age children experiencing homelessness; and
- Children who are in a local institution or attending a community day program for neglected or delinquent children and youth. (ESSA Section 1115(c)(2)).

## LEA-Operated Programs

An LEA-operated program may operate under a TAS program model. If the LEA budget cannot support a districtwide preschool, an LEA may choose to serve preschool children who reside in specific Title I school attendance areas rather than serve the whole LEA.

## School-Operated Programs

**Schoolwide:** A school that operates a Title I SW program may use funds available under Title I, Part A to establish or enhance preschool programs for children under 6 years of age. ESSA, Sec. 1114 (c).

**Targeted Assistance:** Like a K-12 TAS program, preschool children most at risk of failing to meet state academic standards when they reach kindergarten must be identified based on multiple educationally related objective criteria.

## Compliance

An LEA or school that uses Title I funds to operate a preschool program must comply with the same requirements that apply to all Title I programs, including, but not limited to:

- Evidence of Parent and Family Engagement
- Evidence-based program design and annual evaluation
- Targeted Assistance program: multicriteria selection and rank order
- Properly licensed teachers/staff
- Professional Development
- Coordination with Head Start and other Early Childhood programs – transition to kindergarten
- FAPE, SWD inclusion (ages 3-5)



- Supplement, not Supplant
- Maintaining fiscal records

The preschool program must also meet Head Start education performance standards. (ESSA, Sec. 1112 (c)(7)).

### **Coordination with Nonprofit or For-Profit Preschool Programs**

An LEA or school may use Title I funds to improve the quality or extend the day or number of days of state preschool, Head Start, childcare or nonprofit or for-profit external providers with expertise in using evidence-based or other effective strategies to improve student achievement in early learning programs for eligible children. (ESSA Sec. 1114(d)).

The LEA may provide preschool services directly or jointly with the community-based preschool. Funds must be used to supplement or expand services. The LEA must maintain control of the funds and cannot transfer them directly to the community-based program. Title I funds may be used to provide preschool services for children who:

- Are not eligible for Head Start services based on income requirements;
- Are eligible for but have not been served in a Head Start center due to unmet need;
- Are enrolled in an early childhood education and assistance program, Head Start, childcare or community-based early learning program and need additional services (such as extended day or increased number of days); or
- Would benefit from home visiting because they are at risk of failing to meet the state's challenging academic standards.

### **Parent and Family Engagement**

Engaging parents and family can improve the early learning program dramatically and is a basic requirement for all Title I-funded programs. An LEA's written PFE policy/plan should include opportunities to coordinate and integrate parental involvement strategies under Title I with public preschool programs, Head Start and other early learning programs.

### **Supporting Improved Early Childhood Instruction with Title I**

In addition to providing direct preschool services, Title I funds can be used to support early learning in other ways, such as for professional learning including joint professional development for early childhood staff and elementary school staff. Title I funds may be used to support ongoing professional development for any teacher in a Title I preschool program so long as the training is related to the Title I preschool program and designed to meet the education needs of Title I-eligible children. Title I funds also may be used for professional development for teachers in a preschool program that does not receive Title I funds (including a community-based program) provided the children attending the program are likely to attend a Title I elementary school when they enter kindergarten. (US 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).

### Tracking the use of Federal Funds in Early Learning Programs

In addition to programmatic compliance, certain accounting records must be kept. The [Uniform Grant Guidance](#) (UGG) contains regulations on spending and record keeping that apply to all federal grants.

Basic required records include:

- Time and effort logs for federally funded staff, particularly if they are dual funded;
- Student lists tracked to the correct funding sources;
- Inventory of all equipment and property purchased with federal funds.

Please refer to the UGG and non-regulatory guidance documents for detailed information on the additional requirements for each grant.

### Funding Allowability

Title I Section	Topic	Allowability
1114(c)	Schoolwide Preschool Program	A school that operates a SW program may use funds to establish or enhance preschool programs for children under 6 years of age.
1114(d)	Community Preschool Program	The services of a schoolwide program may be delivered by nonprofit or for-profit external providers with expertise in using evidence-based or other effective strategies to improve student achievement.
1115(b)(2)(C)	Targeted Assistance Preschool Program	A TAS program school may use funds to assist preschool children in the transition from early childhood education programs to elementary school programs.
1116(a)(3)(D)(i)	Parent and Family Engagement	An LEA may use funds reserved for PFE to support schools and nonprofit organizations in providing family engagement professional development. This may be provided jointly to elementary school staff, early childhood educators, and parents and family members.

### Additional Resources

- [Non-Regulatory Guidance Early Learning in the Every Student Succeeds Act: Expanding Opportunities to Support our Youngest Learners](#)
- [Guidance on Serving Preschool Children Through Title I, Part A](#)

**APPENDIX E – PARENT & FAMILY ENGAGEMENT CHECKLISTS**

**LEA-level Checklist**

A. Written Policy (Section 1116(a)(1)(2))	Evidence of Implementation
<p>1. In consultation with parents of participating children, the LEA conducts outreach to all parents and family members of participating children, and implements programs, activities, and procedures for the involvement of parents and family members. Section 1116 (a)(1)</p>	<ul style="list-style-type: none"> <li>• Input from parents/families</li> <li>• SANE from parent meetings</li> <li>• Announcements/Fliers</li> <li>• Parents feedback</li> <li>• Translated documents</li> <li>• Receipts for accommodations/ interpreters</li> </ul>
<p>2. LEA establishes expectations and objectives for meaningful parent and family involvement. (Section 1116(a)(1)(2))</p>	<ul style="list-style-type: none"> <li>• Translated documents</li> <li>• Evidence in LEA plan</li> <li>• SAN from meeting discussing expectations and objectives</li> </ul>
<p>3. Parent and family member input:</p> <ul style="list-style-type: none"> <li>a. Jointly developed a written parent and family engagement policy that is agreed on with, and distributed to, parents and family members of participating children. Section 1116(a)(2)</li> <li>b. Jointly developed the local educational agency plan under section 1112, and the development of support and improvement plans under paragraphs (1) and (2) of section 1111(d). Section 1116(a)(2)(A)</li> <li>c. Involved in the decisions regarding how funds reserved under subparagraph (A) are allotted for parental involvement activities. Section 1116(a)(3)(A)</li> </ul>	<ul style="list-style-type: none"> <li>• SAN from parent meetings with agendas that identify specific topics for input.</li> <li>• Example of how the Plan is distributed and available for parents and community may include:               <ul style="list-style-type: none"> <li>○ LEA/school website</li> <li>○ Student handbook</li> <li>○ School newsletters</li> <li>○ Plans and compact sent home via backpack/ orientation packet</li> </ul> </li> <li>• SAN from parent meetings specific to Section 1112.</li> <li>• SAN from parent meetings specifying agenda item on Title I PFE funds</li> <li>• Announcements/Fliers for meetings.</li> </ul>

A. Written Policy (Section 1116(a)(1)(2))	Evidence of Implementation
<p>4. Provides coordination, technical assistance, and other support necessary to assist and <b>*build the capacity of all</b> participating schools <b>within the LEA</b> in planning and implementing effective parent and family involvement activities to improve student academic achievement and school performance. (This <b>may include meaningful consultation with employers, business leaders, and philanthropic organizations, or individuals with expertise in effectively engaging parents and family members in education</b>). Section 1116(a)(2)(B)</p>	<ul style="list-style-type: none"> <li>• SANE or other evidence that the LEA provides coordination, technical assistance. See building capacity section (B).</li> </ul>
<p>5. Coordinates and integrates parent and family engagement strategies with other relevant Federal, State, and local laws and programs, to the extent feasible and appropriate. Section 1116(a)(2)(C)</p>	<ul style="list-style-type: none"> <li>• Evidence in LEA plan</li> <li>• SANE or other evidence of coordinated activities with Federal, State, and local programs, including Judy Centers, Head Start, Title III, Special Education, etc.to the extent feasible and appropriate.</li> </ul>
<p>6. Conducts with the involvement of parents an annual evaluation of the content and effectiveness of parent involvement policy addressing: (Sec. 1116 (a)(2)(D)(E)</p> <ol style="list-style-type: none"> <li>barriers to greater participation by parents;</li> <li>the needs of parents and family members to assist with the learning of their children, including engaging with school personnel and teachers;</li> <li>strategies to support successful school and family interactions;</li> <li>used findings from evaluation to design/revise the policy/plan incorporating evidence-based strategies for more effective parental involvement.</li> </ol>	<ul style="list-style-type: none"> <li>• Completed LEA level evaluations/surveys addressing:</li> <li>• Barriers to greater participation by parents;</li> <li>• Needs of parents and family members to assist with the learning of their children, including engaging with school personnel and teachers;</li> <li>• Strategies to support successful school and family interactions; and other support to school.</li> <li>• Used findings from evaluation to design/revise the policy/plan incorporating evidence-based strategies for more effective parental involvement.</li> <li>• Communication/outreach regarding evaluation/survey of LEA Parent and Family Engagement Plan</li> <li>• Results of data/feedback</li> <li>• Revisions to policy/plan are made, based on evaluation, if applicable</li> <li>• SAN with meeting notes, if applicable</li> <li>• Evidence supporting the development of the evaluation tool, distribution and collection of parent surveys, if applicable.</li> </ul>

A. Written Policy (Section 1116(a)(1)(2))	Evidence of Implementation
<p>7. The LEA's policy/plan includes at least one of the following strategies:</p> <ul style="list-style-type: none"> <li>a. Supporting schools and nonprofit organizations in providing professional development for the LEA and school personnel regarding parent and family engagement strategies.</li> <li>b. Supporting programs that reach parents and family members at home, in the community, and at school.</li> <li>c. Disseminating information on best practices focused on parent and family engagement.</li> <li>d. Collaborating or providing subgrants to schools to collaborate, with community-based or other organizations or employers with a record of success in improving and increasing parent and family engagement.</li> <li>e. Engaging in any other activities and strategies the LEA determines are appropriate and consistent with such agency's parent and family engagement policy/plan.</li> </ul>	<ul style="list-style-type: none"> <li>• Evidence in LEA plan</li> <li>• SANE or other evidence supporting strategies - i.e. working with nonprofit organizations, home visits, LEA guide on best practices for schools, subgrants to schools for PFE, LEA's outreach to parents/families supporting activities in the LEA PFE Plan.</li> </ul>

<p><b>B. *Building Capacity: Section 1116(a)(2)(B)</b></p> <p><b>The Plan describes how the LEA will build the school's and families' capacity for involvement</b></p>	<p><b>Evidence of Implementation may include:</b></p>
<p>1. Provide assistance to parents/families in understanding the State academic standards, State and local academic assessments, and how to monitor a child's progress, and how to work with educators to improve the achievement of their children. Section 1116 (e)(1)</p>	<ul style="list-style-type: none"> <li>• SANE from parent meetings, outreach or events with topic specific agenda items.</li> <li>• Announcements/Fliers for outreach/events</li> <li>• Handouts/resources from parent outreach/events, staff development, etc., as appropriate</li> <li>• Translated documents</li> <li>• Receipts for accommodations/ interpreters</li> </ul>
<p>2. Provide materials and training to help parents work with their children to improve academic achievement, such as literacy training and using technology. Section 1116 (e)(2)</p>	<ul style="list-style-type: none"> <li>• SANE from parent meetings, outreach or events with topic specific agenda items.</li> <li>• Announcements/Fliers for outreach/events</li> <li>• Handouts/resources from parent outreach/events, staff development, etc., as appropriate</li> <li>• Translated documents</li> <li>• Receipts for accommodations/interpreters</li> </ul>
<p>3. Educate school personnel (teachers, specialized instruction support personnel, principals and other school leaders) with parental assistance on how to work with parents as equal partners in their child's educational process. Section 1116 (e)(3)</p>	<ul style="list-style-type: none"> <li>• SANE from parent meetings, outreach or events with topic specific agenda items.</li> <li>• Announcements/Fliers for outreach/events</li> <li>• Handouts/resources from parent outreach/events, staff development, etc., as appropriate</li> <li>• Translated documents</li> <li>• Receipts for accommodations/interpreters</li> </ul>

<b>B. *Building Capacity: Section 1116(a)(2)(B)</b> <b>The Plan describes how the LEA will build the school's and families' capacity for involvement</b>	<b>Evidence of Implementation may include:</b>
<p>4. To the extent feasible and appropriate, coordinate and integrate parental involvement programs and activities with other Federal, State, and local programs, including public preschool programs, and conduct other programs such as parent resource centers.</p> <p>Section 1116 (a)(2)(C) and (e)(4)</p>	<ul style="list-style-type: none"> <li>• SANE or other evidence of coordinated activities with Federal, State, and local programs, including Judy Centers, Head Start, Title III, Special Education, etc.to the extent feasible and appropriate.</li> <li>• SANE from parent meetings, outreach or events with topic specific agenda items.</li> <li>• Announcements/Fliers for outreach/events</li> <li>• Handouts/resources from parent outreach/events, staff development, etc., as appropriate</li> <li>• Translated documents</li> <li>• Receipts for accommodations/interpreters</li> </ul>
<p>5. Ensure information related to school and parent/family programs, meetings, and other activities is shared with parents in a format and, to the extent practicable, in a language the parents can understand. Section 1116 (e)(5)</p>	<ul style="list-style-type: none"> <li>• Announcements/Fliers for outreach/events</li> <li>• Handouts/resources from parent outreach/events, staff development, etc., as appropriate</li> <li>• Translated documents</li> <li>• Receipts for accommodations/ interpreters</li> </ul>
<p>6. Provide such other reasonable support (provide literacy training, pay reasonable and necessary expenses associated with local parental involvement activities, including transportation and childcare costs, provide a variety of meeting times and locations) for parental involvement activities as parents may request. Section 1116 (e) (14)</p>	<ul style="list-style-type: none"> <li>• Announcements/Fliers for outreach/events</li> <li>• Handouts/resources from parent outreach/events, staff development, etc., as appropriate</li> <li>• Translated documents</li> <li>• Receipts for accommodations/ interpreters</li> </ul>

<b>C. Accessibility: Section 1116 (f)</b>	<b>Evidence of Implementation</b>
<p>To the extent practicable, provide full opportunities for the participation of parents with limited English proficiency, parents with disabilities, and parents of migratory children. Section 1116 (f)</p>	<ul style="list-style-type: none"> <li>• SANE from LEA technical assistance to schools</li> <li>• Translated documents</li> <li>• Receipts for accommodations/interpreters</li> </ul>

**School-level Checklist**

<b>A. General Requirements: Section 1116(b)(d)</b>	<b>Evidence of Implementation</b>
<p>1. Jointly developed, and distributed, to parents of participating Title I students in a format and written in a language parents/families can understand.</p> <p><b>Parent and Family Engagement Plan</b></p> <p>Date Reviewed for input: _____</p> <p>Date distributed: _____</p> <p><b>School-Parent Compact</b></p> <p>Date Reviewed for input: _____</p>	<ul style="list-style-type: none"> <li>• SAN(E) from parent input meetings</li> <li>• Announcements/Fliers</li> <li>• Parents feedback</li> <li>• Translated documents, if applicable</li> <li>• Receipts for accommodations/interpreters, if applicable</li> <li>• Examples of how the school level Plan is distributed may include:                             <ul style="list-style-type: none"> <li>• School website</li> <li>• Student handbook</li> <li>• School newsletters</li> <li>• Plans sent home via backpack/ orientation packet</li> </ul> </li> </ul>
<p>2. Parents of participating Title I students are involved in the decisions regarding the spending of the parent involvement fund. Section 1116(3)(B)</p>	<ul style="list-style-type: none"> <li>• SAN(E) from parent meetings specifying agenda item on Title I PFE funds</li> <li>• Announcements/Fliers for meetings</li> <li>• Parents feedback</li> </ul>

<b>B. Policy Involvement: Section 1116(c)</b>	<b>Evidence of Implementation</b>
<p>1. Schools convene an annual meeting, at convenient times, to inform parents of the school's role and requirements in implementing Title I, and the right of parents to be involved. Sec.1116 (c)(1)</p>	<ul style="list-style-type: none"> <li>• SAN(E) from annual meeting(s) specifying information about Title I and parents' right to be involved</li> <li>• Announcements/Fliers of outreach/events</li> <li>• Translated documents, if applicable</li> <li>• Receipts for interpreters, transportation, or other accommodations, if applicable</li> </ul>
<p>2. Schools offer a flexible number of meetings, such as morning and evening. Section 1116(c)(2)</p>	<ul style="list-style-type: none"> <li>• Evidence showing flexible meeting times</li> <li>• Announcements/Fliers of outreach/events</li> </ul>



<b>B. Policy Involvement: Section 1116(c)</b>	<b>Evidence of Implementation</b>
<p>3. Involve parents of participating Title I students in an ongoing and timely way in the program planning, review, and improvement of the: Section 1116 (c)(3)</p> <ul style="list-style-type: none"> <li>a. School Parent and Family Engagement Plan</li> <li>b. Schoolwide plan</li> </ul>	<ul style="list-style-type: none"> <li>• SAN from parent meetings specifying agenda item for review and input on</li> <li>• School Parent and Family Engagement Plan</li> <li>• Schoolwide plan</li> <li>• Announcements/Fliers for meetings</li> <li>• Parent feedback</li> </ul>
<p>4. Parents/families will be provided timely information about school programs. Sec. 1116(c)(4)(A)</p>	<ul style="list-style-type: none"> <li>• Announcements/Fliers of outreach/events</li> </ul>
<p>5. The Parent and Family Engagement Plan advises that if the schoolwide program plan (1114) is not satisfactory to parents, submit any parent comments on the plan when the school makes the plan available to the local educational agency. Section 1116(c)(5)</p>	<ul style="list-style-type: none"> <li>• How parents are informed about the SW plan and can make comments if plan is not satisfactory</li> </ul>

<b>C. Shared Responsibility: Section 1116(d) (School-Parent Compact)</b>	<b>Evidence of Implementation</b>
The school-parent compact outlines how parents/families, school staff, and students share responsibility for improved student academic achievement? Section 1116 (d)	
<p>1. <b>School Responsibilities:</b> Describe how the school will:</p> <ul style="list-style-type: none"> <li>a. Provide high-quality curriculum and instruction that enables children to meet the State's academic achievement standards and a supportive and effective learning environment that enables children to meet the State's academic achievement standards. Section 1116(d)(1)</li> <li>b. Conduct annual parent-teacher conferences in elementary schools during which the compact is discussed as it relates to a child's achievement. Section 1116(d)(2)(A)</li> <li>c. Provide frequent reports to families on their child's progress. Section 1116(d)(2)(B)</li> <li>d. Provide reasonable access to staff including opportunities to volunteer and participate in the child's class and observation of classroom activities. Section 1116(d)(2)(C)</li> <li>e. Ongoing basis, ensuring regular two-way, meaningful communication between home and school and in a language the family members can understand. Section 1116(d)(2)(D)</li> </ul>	<ul style="list-style-type: none"> <li>• Completed MSDE PFE school level checklist for compact showing all components are addressed</li> <li>• SANE from parent meetings specifying agenda item for review and input on the school-parent compact</li> <li>• Announcements/Fliers for meetings</li> <li>• Parent feedback</li> <li>• Translated school-parent compacts, if applicable</li> <li>• SANE from sharing school-parent compact with parents and family members</li> </ul>
<p>2. <b>Parent Responsibilities:</b> Describe how parents/families will be responsible for their child's learning (i.e., classroom volunteering, participating in decision-making, and use of extracurricular time.) Section 1116 (d)(1)</p>	<ul style="list-style-type: none"> <li>• Completed MSDE PFE school level checklist for compact showing all components are addressed</li> </ul>
<p>3. <b>Student Responsibilities:</b> Describe ways students will support their own academic achievement. Section 1116 (d)</p>	<ul style="list-style-type: none"> <li>• Completed MSDE PFE school level checklist for compact showing all components are addressed</li> </ul>

<b>D. Building Capacity: Section 1116(e)</b> <b>The Plan describes how the school will build the schools' and parents'/families' capacity for parental involvement</b>	<b>Evidence of Implementation may include:</b>
<p>1. Provide assistance to parents/families in understanding the State academic standards, State and local academic assessments, and how to monitor a child's progress, and how to work with educators to improve the achievement of their children.</p> <p>Section 1116 (e)(1)</p>	<ul style="list-style-type: none"> <li>• SANE from parent meetings, outreach or events with topic specific agenda items.</li> <li>• Announcements/Fliers for outreach/events</li> <li>• Handouts/resources from parent outreach/events, staff development, etc., as appropriate</li> <li>• Translated documents</li> <li>• Receipts for accommodations/ interpreters</li> </ul>
<p>2. Provide materials and training to help parents work with their children to improve academic achievement, such as literacy training and using technology.</p> <p>Section 1116(e)(2)</p>	<ul style="list-style-type: none"> <li>• SANE from parent meetings, outreach or events with topic specific agenda items.</li> <li>• Announcements/Fliers for outreach/events</li> <li>• Handouts/resources from parent outreach/events, staff development, etc., as appropriate</li> <li>• Translated documents</li> <li>• Receipts for accommodations/ interpreters</li> </ul>
<p>3. Educate school personnel (teachers, specialized instruction support personnel, principals and other school leaders) with parental assistance on how to work with parents as equal partners in their child's educational process. Section 1116(e)(3)</p>	<ul style="list-style-type: none"> <li>• SANE from parent meetings, outreach or events with topic specific agenda items.</li> <li>• Announcements/Fliers for outreach/events</li> <li>• Handouts/resources from parent outreach/events, staff development, etc., as appropriate</li> <li>• Translated documents</li> <li>• Receipts for accommodations/ interpreters</li> </ul>

<b>D. Building Capacity: Section 1116(e)</b> <b>The Plan describes how the school will build the schools' and parents'/families' capacity for parental involvement</b>	<b>Evidence of Implementation may include:</b>
<p>4. To the extent feasible and appropriate, coordinate and integrate parental involvement programs and activities with other Federal, State, and local programs, including public preschool programs, and conduct other programs such as parent resource centers.</p> <p>Section 1116(a)(2)(C) and (e)(4)</p>	<ul style="list-style-type: none"> <li>• SANE or other evidence of coordinated activities with Federal, State, and local programs, including Judy Centers, Head Start, Title III, Special Education, etc.to the extent feasible and appropriate.</li> <li>• SANE from parent meetings, outreach or events with topic specific agenda items.</li> <li>• Announcements/Fliers for outreach/events</li> <li>• Handouts/resources from parent outreach/events, staff development, etc., as appropriate</li> <li>• Translated documents</li> <li>• Receipts for accommodations/ interpreters</li> </ul>
<p>5. Ensure information related to school and parent/family programs, meetings, and other activities is shared with parents in a format and, to the extent practicable, in a language the parents can understand. Section 1116(e)(5)</p>	<ul style="list-style-type: none"> <li>• Announcements/Fliers for outreach/events</li> <li>• Handouts/resources from parent outreach/events, staff development, etc., as appropriate</li> <li>• Translated documents</li> <li>• Receipts for accommodations/ interpreters</li> </ul>
<p>6. Provide such other reasonable support (provide literacy training, pay reasonable and necessary expenses associated with local parental involvement activities, including transportation and child care costs, provide a variety of meeting times and locations) for parental involvement activities as parents may request. Section 1116(e)(14)</p>	<ul style="list-style-type: none"> <li>• Announcements/Fliers for outreach/events</li> <li>• Handouts/resources from parent outreach/events, staff development, etc., as appropriate</li> <li>• Translated documents</li> <li>• Receipts for accommodations/ interpreters</li> </ul>
<b>E. Accessibility: Section 1116(f)</b>	<b>Evidence of Implementation</b>
<p>To the extent practicable, provide full opportunities for the participation of parents with limited English proficiency, parents with disabilities, and parents of migratory children. Section 1116(f)</p>	<ul style="list-style-type: none"> <li>• SANE from LEA technical assistance to schools</li> <li>• Translated documents</li> <li>• Receipts for accommodations/ interpreters</li> </ul>

## Glossary of Acronyms

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AFR – Agency Financial Report

APR – Annual Program Review

ATSI – Additional Targeted Support and Improvement

CNA – Comprehensive Needs Assessment

CSI – Comprehensive Support and Improvement

DLT – District Leadership Team

EDGAR – Education Department General Administrative Regulations

EL – English Learner

ESEA – Elementary and Secondary Education Act

ESSA – Every Student Succeeds Act

FAPE – Free Appropriate Public Education

FaRMS – Free and Reduced-Price Meal Services

FTE – Full-time Equivalent

ILT – Instructional Leadership Team

LEA – Local Education Agency

ML – Multi-lingual Learner

MOE – Maintenance of Effort

MOU – Memorandum of Understanding

MSDE – Maryland State Department of Education

MTSS – Multi-tiered System of Supports

PAR – Personnel Activity Report

PBIS – Positive Behavior Intervention and Supports

PFE – Parent and Family Engagement

POC – Point of Contact

SAN – Sign-in sheet, Agenda, Notes

SANE – Sign-in sheet, Agenda, Notes, Evaluation

SIT – School Improvement Team

SLT – School Leadership Team

SNS – Supplement Not Supplant

SW – Schoolwide Program

SWD – Students with Disabilities

TAS – Targeted Assistance Program

TSI – Targeted Support and Improvement

USED – United States Department of Education

### **ACKNOWLEDGMENT**

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- Kentucky Department of Education
- Maryland State Department of Education
- Ohio Department of Education and Workforce
- Oregon Department of Education
- Pennsylvania Department of Education
- United States Department of Education
- Washington (State) Office of the Superintendent of Public Instruction