



Title I, Part A Preschool

**Updated Non-Regulatory Guidance
Released February 2024**



General Information

- A Title I preschool program is a preschool program for which an LEA or school uses Title I funds, in whole or in part, to improve educational outcomes for eligible children from birth to the age at which the LEA provides a free public elementary education.
- Designed to prepare eligible children with the prerequisite skills and dispositions for learning that will enable them to benefit from later school experiences.

ESEA sections 1113(c)(5), 1114(c), and 1115(c)(1)(A)(ii); 34 C.F.R. § 77.1



General Information continued

- Three types:
 - School Operated
 - District Operated
 - Enhancement of Current Preschool
 - Support for Early Childhood Educators
 - Expanding Slots
 - Extending Day or Year

If Title I, Part A funds are used, Title I, Part A requirements exist for that program

Preschool in a Schoolwide Building

- Designed as part of a comprehensive reform strategy.
- Accordingly, a school operating a schoolwide program may use Title I funds for preschool activities if the preschool activities support the needs of students in the school as identified through the comprehensive needs assessment and as articulated in the schoolwide plan.
- All students are eligible.

Preschool in a Targeted Assistance Building

- Services to students with the greatest need for assistance.
- Title I funds may only be used to serve preschool children whom the school identifies as most at risk of failing to meet the challenging State academic standards when they reach school-age.

District Title I Preschool Program

■ Districtwide

- An LEA may serve preschool children who reside throughout the LEA and whom the LEA identifies as eligible because they are most at risk of failing to meet the challenging State academic standards.
- An LEA may not use Title I funds to implement a districtwide preschool program to benefit all preschool students in the LEA unless all the schools in the LEA are Title I schools operating schoolwide programs.

■ Portion of the Area

- May choose to serve a portion of the attendance area.
 - High Poverty Area or Title I Schoolwide School Attendance Area, for example.



Districtwide Title I Preschool Program

- It should be evident in MICIP how the Title I funded preschool program is part of the plan.
- There should be an assurance that the LEA's Title I funded preschool program will comply with the performance standards established under section 641A(a) of the Head Start Act (42 U.S.C. 9836a(a)) and ESEA Section 1112(c)(7).

Equitable Services

- An LEA is not required to provide equitable services to preschool children in private schools.
- Preschool-aged children from low-income families do not generate funds for services.
- Through timely and meaningful consultation, it may be determined that preschool services should be provided after taking into consideration the needs of the preschool-aged children and the funds available.

Use of Funds

- Wages and benefits for staff.
- If no appropriate existing identification data, an LEA can use Title I, Part A funds to identify eligible children.
- Professional Development for administrators, teachers and paraprofessionals.
- Title I funds can be used to support the development of paraprofessionals working in the program to become preschool teachers.

Use of Funds Continued

- Title I funds can be used to support the development of paraprofessionals working in the program to become preschool teachers
- Extending the day/year
- Expanding enrollment
- Paying rent on a facility
- Minor remodeling
- Providing comprehensive services to eligible children

Other Considerations

- A Title I, Part A funded preschool can be held at other locations (including public school buildings, public libraries, community centers, privately owned facilities, facilities owned by faith-based organizations, and other appropriate settings).
- To learn more about student eligibility, teacher and paraprofessional requirements, and other important information, please see the [non-regulatory guidance](#) or contact your regional consultant.



Title I, Part A Comparability

TITLE I, PART A

Overview

- Intent and Purpose of Comparability
- Review Comparability Report in NexSys
- Common Errors
- REP Information and Helpful Links

What is Comparability?

- ❑ A test to ensure that state and locally funded services are substantially comparable among individual schools.
- ❑ The test prevents an LEA that receives Title I, Part A funding from diverting state and local resources away from its Title I, Part A school buildings.
- ❑ It helps to ensure that all Michigan students living in poverty are adequately and equitably served under the Every Student Succeeds Act guidelines.

Comparability

- ❑ All K-12th grade students for which the LEA serves as the Primary Educational Provider (PEPE) and the instructional staff responsible for those students are to be included in the calculation.
- ❑ Which staff members are included as “instructional staff”?
- ❑ Teachers and other personnel who provide direct instructional services.
- ❑ Other personnel who provide services that support instruction.



Comparability Continued

- ❑ The Comparability Report only pulls in staff identified in the REP (Registry of Educational Personnel) as instructional or instructional support staff and assigned to a building.
- ❑ Accurate REP reporting is essential.
- ❑ Keep this in mind in the Fall.



How does an LEA meet Comparability?

In a grade span with **Both** Title I and Non-Title I buildings:

- When the student-to-instructional staff ratio in Title I funded buildings is roughly equivalent or lower than the ratio for its non-Title I buildings

In a grade span with **All** Title I buildings:

- When the student-to-instructional staff ratio for each building is roughly equivalent to all others; or
- When the student-to-instructional staff ratio for the highest-poverty Title I buildings is roughly equivalent to or lower than the ratio for the lower-poverty buildings



Does my district
need to demonstrate
Comparability?



Is Comparability required?

- Does your district have more than one school building per grade span group?
- Is at least one of those schools in that grade span group a Title I, Part A school, or skipped school?
- Are there at least 100 students in all of the schools in that grade span group?

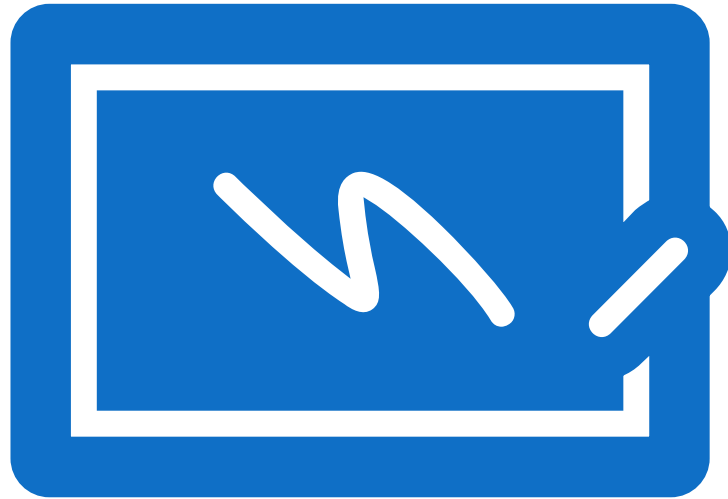
Comparability Timeline

- **September 1, 2024**-Fall REP collection opens
- **October 2024**-Comparability Report available
- **December 1, 2024**-Deadline for LEAs to validate REP data and ensure all staff have been properly entered and coded.
- **December 15, 2024**-Comparability Report submission deadline
- **January 31, 2025**-If the LEA does not meet comparability, staffing adjustments must be made by the end of January.





If a district cannot demonstrate Comparability, staffing changes will need to be made by January 31



Section 31A Title I-Like Programs

**Title I Eligible Schools Screen –
Skipped School Help document
pages 13-15**

SKIPPED SCHOOLS

Skipped Schools (Help Document, page 15)

If the LEA chooses not to fund an eligible Title I, Part A school with Title I, Part A funds but funds another school lower down in the ranking with Title I funds, then the school is a “skipped” school and is not considered Title I for Comprehensive/Targeted Support requirements under the Elementary and Secondary Education Act of 1965 (ESEA).

You may only “skip” a school to fund another school in the same District-wide or grade-span grouping. If there are no other schools in the same grouping, you cannot “skip” that school. “Skipping” only pertains to LEAs required to follow rank and serve.

Skipped Schools

- The LEA should identify the type of program to be provided in the Program Type column and check that the school will be skipped in the skipped column.
- A Title I-like program in a school funded with Section 31a may meet the requirements of either a Schoolwide or a Targeted Assistance program by providing direct instructional services as described in Section 1114 o4 1115 of the Title I, Part A legislation [ESEA 1113(b)(1)(D)].
- Most Skipped Schools will provide a Targeted Assistance program.
- Only Skipped Schools that have undergone the MDE-approved schoolwide planning process and have the Michigan Department of Education approval [ESEA S 1114] may select a schoolwide program.

Skipped Schools Continued

- The LEA will need to allocate Section 31a funds to the school to provide a Title I-like program in that school and complete a building budget in the Section 31a Like Program Group.
- Eligible private school students who reside in a “skipped” school attendance area may generate funding and must be provided Title I services even though the public-school attendance area is skipped [ESEA S1113 (b)(2)].
- LEAs must upload Targeted or Schoolwide Templates for all Skipped Schools in NexSys that describe their Title I-like programs.



Students Experiencing Homelessness - Updates



Title I, Part A Homeless Set-Aside

Section 1001 Title I, Part A Purpose: The purpose of this title is to provide all children with significant opportunity to receive a fair, equitable, and high-quality education **and to close educational achievement gaps.**

Section 1113(c)(3) of the *Elementary and Secondary Education Act of 1965 (ESEA)* requires **all** Local Educational Agencies (LEAs) to reserve funds to ensure comparable services for **children and youth experiencing homelessness.**

AND

As determined by a *needs assessment*, reserve funds to provide children and youth experiencing homelessness with services not ordinarily provided to other students, including (but not limited to):

- Funding for a liaison with the capacity to carry out the required duties
- Transportation related to the school of origin.

Questions?: LopezBarajas@michigan.gov



Title I, Part A Homeless Set-Aside cont.

- US ED began collecting the Title I, Part A Homeless Set Aside in 2022-23
- Michigan received a finding related to Title I, Part A Homeless Set Aside during the 2022-23 US ED Homeless Education Monitoring in 2022-23
- General guidance information is provided in this presentation and, on the website, www.Michigan.gov/homeless. Additional guidance will be shared later this spring specifically related to “adequacy” following an extensive analysis of the 2023-24 Consolidated Applications
- The additional guidance will be sent directly to district homeless liaisons and NexSys contacts and posted on the website
- *Note:* If you are braiding funds to meet these needs, please document the information. You will be asked for the details of this braiding



Guidance Document

Student needs drive the budget

Section 1113(c)(3) of the Elementary and Secondary Education Act of 1965 (ESEA), requires all local educational agencies (LEAs) to reserve the funds to ensure comparable services for children and youth experiencing homelessness, and as determined by a needs assessment, reserve funds to provide children and youth experiencing homelessness with services not ordinarily provided to other students, including (but not limited to), funding for Homeless Education Liaison who has the capacity to carry out the required duties, and funding for transportation related to the school of origin.



Data Considerations for the 6 Step Process

MSDS Data: identification of students experiencing homelessness

Mischooldata.org: achievement outcomes for students experiencing homelessness

Compare identification rates to national or state averages

Compare all students for the grade level for achievement data

National Averages:

5.5% of the LEA's Free & Reduced Lunch counts (FRL)

2.5% of the LEA's total enrollment



Title I, Part A Homeless Set Aside Worksheet

Find more information and support by going to the [MDE McKinney Vento Homeless](#) page.

An additional resource that will assist is this Homeless Needs Assessment Worksheet located under Resource Materials.

[Title I, Part A Homeless Set-Aside Video](#)