



# FAQ: Using Title I of ESEA for Early Education

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## About this Paper

This FAQ provides answers to commonly asked questions on the use of Title I of ESEA funds for early education. Answers are based on the authors' understanding of the ESEA law and ED guidance on Title I to date.

## Related CLASP Resources

[Title I and Early Education: Models for Using ARRA Funds](#)

[Title I and Early Childhood Programs: A Look at Investments in the NCLB Era](#)

[Missed Opportunities: The Possibilities and Challenges of Funding High-quality Preschool through Title I of the No Child Left Behind Act](#)

[Presentation on Title I Early Education](#)

By Hannah Matthews and Danielle Ewen

Title I of the Elementary and Secondary Education Act (ESEA, or the No Child Left Behind Act, NCLB) was established in 1965 to provide schools that serve disadvantaged children with federal funding to meet these children's educational needs. Part A of Title I provides allocations to state educational agencies (SEAs) that in turn, distribute funds to local educational agencies (LEAs) on the basis of a funding formula accounting for the percentage of low-income children, as defined by the state.<sup>1</sup> LEAs then allocate funds to schools based on the percentage of low-income children among all of the students in the school. The American Recovery and Reinvestment Act (ARRA) of 2009 included an additional \$13 billion in funding for Title I.<sup>2</sup> Funds flow to states and in turn to school districts and schools. The U.S. Department of Education (ED) wrote in Title I ARRA guidance, "ED encourages LEAs [local educational agencies] to give particular consideration to early childhood education and programs serving secondary schools, areas for which they may not have had sufficient resources in the past." Some school districts are moving forward in using these funds for early childhood initiatives. Other districts, however, may be considering the use of Title I dollars but have some concerns about how these funds may be used.

In 2004, ED issued non-regulatory guidance, *Serving Preschool Children Under Title I*; however, this guidance does not appear to have been widely known or considered at the local level. The following FAQ are derived from conversations CLASP has had with state and local school district personnel contemplating the use of Title I funds for early education. Our answers are based on our understanding of the ESEA law and ED guidance on Title I, including regular appropriations and ARRA funds.

## 1. What is a Title I Preschool Program?

Title I is not a specific program. Title I is a funding stream that may support a broad range of early education programs and services, in addition to traditional K-12 programs. Title I defines preschool as “a program of educational services for eligible children below the age at which the LEA provides elementary education and is focused on raising the academic achievement of children once they reach school age”.<sup>3</sup> In other words, Title I preschool funds early education programs for young children from birth through the age of school entry, usually around 5 years old. Title I funds have been permitted to be used for young children below compulsory school age since the creation of the ESEA. Title I preschool is not limited to federal or state-funded pre-kindergarten initiatives.

Often, Title I funds are layered with other funding sources, including child care subsidies, Head Start, Even Start, Individuals with Disabilities Education Act (IDEA), and state pre-kindergarten funding, to support particular components of an early childhood program, to expand the hours of a program or to increase the number of children served. The Title I dollars may also be used for professional development, developmental screening, and collaboration activities between schools and community-based child care providers.

## 2. What Ages of Children Can Title I Funds Serve?

Besides serving school-age children, Title I funds can be used in programs serving children from birth to the age at which the school district provides a free elementary education, usually around 5 years old. However, only 3 percent of children receiving Title I-funded services, or nearly 456,500 children, are younger than the age of school entry.<sup>4</sup> Districts are not required to report the specific ages of children served, only that Title I preschool services were provided to children younger than the age of school entry.

## 3. Are Title I Funds Just for Pre-

## kindergarten Programs for 3- and 4-Year-Olds?

No. Under Title I, preschool means a range of programmatic and support services for children from birth through the official age of school entry in a district or state. These include:

- Classroom-based instructional programs.
- Salaries and benefits for teachers and other staff.
- Home visiting programs.
- Extended day programs in Head Start or community-based child care programs.
- Professional development for early childhood professionals who serve Title I eligible children, including providers in non-school settings.
- Support services, such as nutrition, vision, dental, and counseling services.
- Screening and diagnostic assessment.
- Summer enrichment programs for young children and their families.
- Family literacy programs.
- Transition programs.
- Parental involvement initiatives.

## 4. Which Children are Eligible for Title I Preschool?

Eligibility, in part, is based on whether a program is provided at the district level or school level and whether a program is a schoolwide or districtwide program (open to all children in a given geographic area) or a targeted assistance program (see below, questions #5-6). Title I is designed to meet the needs of children who are at-risk of academic failure. School districts and individual schools may decide what measures to use to determine at-risk status for young children. Income may be used to determine and prioritize eligibility, but cannot be the sole factor for determining eligibility. Children who have participated in Head Start, Even Start, Early Reading First, or a Title I preschool program at any time over the past two years; homeless children; and children in institutions for neglected or delinquent children are also eligible for Title I-funded preschool services.

## **5. Who Decides at the District Level Whether To Use Title I Funds for Preschool Children and Programs?**

LEAs have the option to use Title I funds to provide early education programs for all children in the district or part of a district. They may also decide not to use Title I funds for children younger than kindergarten or mandatory age of school entry. Decision-making authority for Title I funds may be different in each district and may include the district Title I director, the superintendent, the school board, or other individuals. Eligibility for a districtwide program is based on residence and assessment of risk for not meeting state academic standards (as determined by multiple, education-related, objective criteria determined by the state). LEAs may choose to use some or all of their Title I funds for districtwide early childhood programs, and then allocate any remainder to individual schools according to the federal Title I allocation requirements.

## **6. Can Title I funds be Used by the State to Fund State Pre-Kindergarten Programs?**

States do not provide Title I programs and services directly and do not control how LEAs use Title I funds. While an individual LEA may decide to use a portion or all of their funds for pre-kindergarten—either in partnership with the state pre-kindergarten funds and program design, or as a separate program—this decision does not happen at the state level. Generally, the small portion of Title I funds reserved by SEAs is used for administrative costs and activities associated with school improvement.<sup>5</sup> States may choose to provide technical assistance to districts on layering or braiding Title I funds with state pre-kindergarten dollars at the local level.

## **7. Can an Individual School Decide to Provide Title I Preschool?**

Yes. Schools that serve a student population comprised of at least 40 percent low-income students may choose to use their Title I funds for early education for schoolwide

programs open to all children living within the school's attendance area. Schools with lower rates of low-income students may choose to use Title I funds for targeted programs open to children considered at-risk for not meeting state academic standards. The decision to spend Title I funds on early childhood may be made independently of similar decisions at the district level by a principal or other leader in the school.

## **8. Can Title I Funds be Used in Non-School Settings?**

Yes. The 2004 Title I non-regulatory guidance states:

Preschool services may be provided at any location that other Title I services may be provided, including public school buildings, public libraries, community centers, privately owned facilities (including facilities owned by faith-based organizations (FBOs), the child's home and other appropriate settings.

If appropriate district or school facilities are not available for preschool services, the district and school should consider working with children in existing childcare programs such as Head Start, Even Start, Early Reading First, or a program funded under the Child Care Development Block Grant, or a site conducting a family literacy program. In any case, the setting should be of sufficient quality to facilitate effective program implementation.<sup>6</sup>

## **9. What is the State Role in Using Title I Funds for Preschool?**

Although Title I funds initially flow to states, almost all of the funds then flow by federal formula to local school districts.<sup>7</sup> SEAs receive funds from the federal government and must allocate at least 95 percent of funds to LEAs. Districts then allocate funds to individual schools or use the funds for districtwide initiatives. While decision-making is made at the local level, states can provide guidance on how funds could be used to signal

priorities. They may also coordinate Title I and early education departments in state departments of education or other state agencies. LEAs report to states on the uses of funds and states can choose to include specific questions about uses of funds for early childhood education in the report criteria. Other than the number of preschool-aged children receiving services, states are not required to report on funds used for younger children to the federal Department of Education.

### **10. Are There Required Uses of Title I for Preschool?**

Generally, no. Because Title I is a flexible funding stream, and not a program, there are few required programmatic components associated with Title I. However, Title I preschool must include a parental involvement component and LEAs must plan for coordinating and integrating Title I preschool with other early education programs in the district, including Head Start and Even Start programs, and with Migrant Education Programs. Title I programs must also plan for the transition of children into elementary school.

Research suggests that Title I funds are often used to improve the quality of existing early childhood programs, pay for a teacher in a program, extend the day so that children receive more hours of high-quality services, or include additional children in existing programs that meet high standards.<sup>8</sup>

### **11. Must Title I Preschool Programs Follow the Head Start Program Standards?**

According to ESEA legislation, Title I preschool programs must meet section 641A(a) of the Head Start Act. The 2004 ED guidance, clarifies that the specific section of the federal Head Start Program Performance Standards applicable to Title I preschool programs refers to the educational standards.<sup>9</sup> However, the 2007 Head Start reauthorization reorganized the performance standards and the reference to section 641A(a) does not provide the clarity needed for program design. We expect

the Department of Education to issue revised guidance clarifying this reference. Until then, programs should continue to meet the Head Start educational standards. Title I-funded programs operating in Even Start programs are required to meet the Even Start program standards, rather than the Head Start standards.

### **12. Must Title I Preschool Teachers Meet the NCLB “Highly-Qualified” Definition?**

Not necessarily. Guidance clarifies that only “teachers working in Title I preschool programs, in States that consider preschool as part of public elementary education, must meet the applicable Title I teacher qualification requirements,” or what is commonly referred to as the highly-qualified definition.<sup>10</sup> The Department of Education has not issued guidance on which states apply to this standard, but it is likely that the state would need to operate a universal preschool program and include preschool in its state constitution’s definition of basic education or its school funding formula for preschool to be considered part of elementary education in a state. For the highly-qualified definition to apply, teachers would have to be paid with Title I dollars. In practice, early childhood programs funded with Title I dollars may take place outside of a school building and have staff members who are not school employees who are paid through other funding sources.

There are Title I requirements for paraprofessionals who provide direct instructional support in Title I preschool programs. Paraprofessionals working in targeted assistance Title I schools must also meet a set of educational requirements if their salary is paid with Title I funds. Paraprofessionals working in Title I schools operating schoolwide programs must meet the same requirements regardless of how their salaries are paid. Paraprofessionals working in Head Start programs that are funded jointly with Head Start and Title I funds must meet the Title I educational requirements only if their salaries are paid by Title I funds. If the Head Start program is part of a Title I schoolwide program, the requirements apply.<sup>11</sup>

### **13. Can Title I Funds Pay for Professional Development? Who Can Participate?**

Yes. Title I funds can be used to pay for professional development of teachers and paraprofessionals working in early education programs receiving Title I funds, regardless of whether Title I funds are used to pay their salaries. Additionally, Title I can fund joint professional development that includes non-Title I preschool teachers and paraprofessionals if the children they serve will likely attend a Title I elementary school and if the professional development supports coordination or transition between non-Title I preschools and Title I elementary schools. In other words, Title I can support professional development initiatives for staff in community-based child care and Head Start programs as well as other early childhood professionals who are working with at-risk children before they enter Title I elementary schools.

### **14. Can Title I Funds be Used for Comprehensive Support and Health Services for Young Children?**

Yes. Title I funds may support the provision of health, nutrition, and other social services if need is shown based on a comprehensive needs assessment and funds are not available from other sources.

### **15. Did ARRA Change How Title I Funds Can be Used for Preschool?**

No. The ARRA funds for Title I follow the same rules as existing Title I funds. This means that the 2004 non-regulatory guidance on using Title I for preschool also applies to the ARRA Title I funds. However, states must report specifically how ARRA funds are used, separate from their existing Title I funds. As a result, there may be new reporting requirements for Title I funds used for early childhood services if they are ARRA-related. Title I ARRA funds, as regular Title I funds, must be used to supplement and not supplant other funding sources.

### **16. How Can I Learn More About Title I funded Preschool?**

CLASP has links to the US Department of Education non-regulatory [guidance](#) on Title I preschool on our [website](#), as well as policy briefs and reports we have published on the subject.<sup>12</sup> Additionally, we are available to answer specific questions on the topic and provide further technical assistance.

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## Endnotes

<sup>1</sup> Title I, Part A allocations are based on four funding formulas established by law. The formulas are based, in part, on population counts and per pupil student expenditures and prioritize funds for the highest-poverty school districts.

<sup>2</sup> The ARRA also made \$49 billion available to states through the State Fiscal Stabilization Fund (SFSF), a one-time grant to help stabilize state and local governments minimize and avoid reductions in education and other public services. Among the permitted uses of funds, LEAs may use their share of funds for any activities authorized under ESEA, including Title I preschool programs. States that are left with remaining funds after restoring support for elementary, secondary, and higher education will reallocate these funds to LEAs based on regular Title I allocations. See U.S. Department of Education, *Guidance on the State Fiscal Stabilization Fund Program*, 2009,

<http://www.ed.gov/programs/statestabilization/applicant.html>.

<sup>3</sup> [Section 1115(b)(1)(A)(ii), ESEA.]

<sup>4</sup> U.S. Department of Education, *State ESEA Title I Participation Information*, 2003-2004.

<sup>5</sup> See U.S. Department of Education, <http://www.ed.gov/programs/sif/index.html>.

<sup>6</sup> U.S. Department of Education, *Serving Preschool Children Under Title I Non-Regulatory Guidance*, 2004, Sections D-3 and D-4,

<http://www.ed.gov/policy/elsec/guid/preschoolguidance.doc>.

<sup>7</sup> [Section 1124, ESEA.]

<sup>8</sup> Danielle Ewen and Hannah Matthews, *Title I and Early Childhood Programs: A Look at Investments in the NCLB Era*, CLASP, 2007,

[http://www.clasp.org/publications/ccee\\_paper2.pdf](http://www.clasp.org/publications/ccee_paper2.pdf).

<sup>9</sup> 45 CFR 1304.21 Education and Early Childhood Development.

<sup>10</sup> U.S. Department of Education, *Serving Preschool Children Under Title I Non-Regulatory Guidance*, 2004, Sections E-1.

For more on Title I teacher qualifications, see *Improving Teacher Quality Non-Regulatory Guidance* at <http://www.ed.gov/programs/teacherqual/guidance.doc> and

*Title I Final Regulations* at <http://www.ed.gov/legislation/FedRegister/finrule/2003-2/041803a.pdf>.

<sup>11</sup> For more on paraprofessional qualifications, see <http://www.ed.gov/policy/elsec/guid/paraguidance.doc>.

<sup>12</sup> *Title I and Early Education: Models for Using ARRA Funds*, CLASP, June 1, 2009, [www.clasp.org/issues/pages?type=child\\_care\\_and\\_early\\_education&id=0005](http://www.clasp.org/issues/pages?type=child_care_and_early_education&id=0005).