Title I Preschool
NC Standards and Procedures

Federal Program Monitoring
North Carolina Department of Public Instruction

January 2021
Since the enactment of the Elementary and Secondary Education Act (ESEA) in 1965, preschool services to eligible children have been an allowable use of Title I funds. Today, with the law’s reauthorization through the Every Student Succeeds Act (ESSA), the U.S. Department of Education continues to build on the civil rights legacy of the original law by providing protections for our most vulnerable students and directing federal resources toward programs and strategies that help all students thrive. Early learning is woven throughout the ESEA, as amended by the ESSA, as a means of addressing education equity in order to eliminate disparities in student achievement and support students’ school success. The Department’s strategic goal for early learning is to improve the health, social-emotional, and cognitive outcomes for all children from birth to third grade. A robust body of research shows that high-quality learning, starting at birth and continuing to third grade, can promote healthy social-emotional development, assist with English language acquisition, and help build a strong academic foundation. While all children benefit by participating in high-quality early learning programs, the achievement gains are largest for children from low-income families and others who have been traditionally underserved (National Research Council and Institute of Medicine, From Neurons to Neighborhoods). Preschool programs must be of high quality to have a significant effect on children’s learning and development.

Introduction & Benefits of High-Quality Early Learning, Non-Regulatory Guidance Early Learning in the Every Student Succeeds Act

Philosophy
North Carolina’s Title I Preschool program is grounded in the National Association for the Education of Young Children’s (NAEYC) framework of principles and guidelines for Developmentally Appropriate Practice, defined as methods that promote each child’s optimal development and learning through a strengths-based, play-based approach to joyful, engaged learning (NAEYC 2020). Environments for young children are child-centered and designed to promote the development of the whole child, including all developmental domains described in Foundations for Early Learning and Development, North Carolina’s early learning standards (approaches to learning, emotional and social development, health and physical development, language development and communication, and cognitive development). Learning experiences are meaningful and relevant for each child and are culturally, linguistically, and ability appropriate.

FUNDING
A Title I LEA or school may use its Title I funds to support a district-operated preschool program or a school-operated preschool program, or for coordination with other preschool programs. Decisions should be made based on the needs of eligible children and the most effective use of funds. The use of Title I funds for a preschool program is a local decision. Decision-making authority for Title I funds may be different in each district and may include the Title I director, the superintendent, the school board, or other individuals. There are several ways in which Title I funds may be used to fund preschool programs. LEAs may reserve an amount from their total allocation to operate a Title I Preschool program for eligible children in the LEA as a whole or for a portion of the LEA. A Title I school may use all or a portion of its Title I funds to operate a preschool program for eligible children.

Title I funds may be used in conjunction with funds from other public early childhood education programs to operate a Title I Preschool program. When funds from multiple programs are combined to cover program expenses, it is considered blended funding. The proportion of Title I funding in blended programs or classrooms is determined by the percent of Title I children enrolled in the classroom.
Title I children may be dually enrolled as Title I/State Funded Pre-K (NC Pre-K), if the eligibility requirements are met for both programs, with Title I eligibility criteria being considered first. From a funding perspective, this means that two funding sources are utilized to fund services.

Charter schools may enroll early childhood students so long as the school also offers a program in elementary or secondary education. Again, the use of Title I funds for preschool is a local decision and regulations apply to all LEAs, including charters.

ELIGIBILITY AND SELECTION

**District (LEA)-Operated Preschool Programs**
An LEA may reserve a portion of funds from its Title I allocation to operate a preschool program for eligible children in the LEA as a whole or in a portion of the LEA.

**District as a Whole:** An LEA may serve preschool children who reside throughout the LEA and whom the LEA identifies as eligible because they are at risk of failing to meet the State’s academic achievement standards when they reach school age.

**Portion of the District:** An LEA may serve preschool children who reside in specific Title I school attendance areas (e.g., its highest-poverty school attendance areas) served by some or all its Title I schools if, for example, an LEA does not have sufficient funds to operate a preschool program for the district as a whole. Justification must be provided if a district chooses to serve a portion of the district as opposed to the whole district. Serving the district as a whole ensures children with the greatest need have the opportunity for services.

Eligibility must be determined on the basis of multiple, educationally relevant, objective criteria such as teacher judgment, interviews with families, and developmentally appropriate measures of child development.

Developmentally appropriate measures of child development are those which screen multiple developmental domains. The NC Department of Public Instruction has identified the following developmental screening tools as appropriate for use in determining risk:

- Ages and Stages Questionnaires (ASQ-3)
- Parents’ Evaluation of Developmental Status (PEDS)
- Developmental Indicators for the Assessment of Learning, Third Edition (DIAL-3) or Fourth Edition (DIAL-4)
- Brigance, including Early Childhood Screen II, Head Start Screen, Preschool Screen II, and K & 1 Screen

Schools are required to select and utilize one of these identified developmental screening instruments. To be a reliable measure of children’s development, developmental screenings must be administered by trained staff in the child’s primary language.

When gathering information from parents or teachers, standardized measures must be used. The Brigance includes subtests that require such input and can be completed as part of the developmental assessment. The DIAL includes these components and can be completed at the same time as the developmental assessment. Both the ASQ and PEDS are completed by parents and have been shown to be more valid than instruments completed by other professionals. The ASQ and PEDS fulfill the requirements for a developmentally appropriate measure as well as parent input.

After developmental screening has been administered to determine risk, results must be documented in writing to verify eligibility. Programs then create a “Multiple Selection Criteria”
eligibility form, to include the results of the screening, family interview, and teacher judgment. A point system that consolidates the results is used.

**Rank Ordering**

Programs are required to document that children with the greatest need are served first. The Multiple Section Criteria form is used to rank-order applicants from those showing the greatest needs to those showing the least. The rank ordered list is developed based on children from the entire district and focuses on educational need. The rank ordered list should not be based on residential school for kindergarten. Also, the list is based on children from the entire district unless the district has justification to show why a portion of the district is being served as opposed to the whole district. Program participants are then selected from that list in the order they are ranked.

Risk factors may not generally be considered in the selection process as eligibility criteria. While risk factors (e.g., mother’s level of education, incarcerated parent, etc.) may indicate the potential for concern, few provide information that specifically describes the developmental status of the child. LEAs may decide to use a particular risk factor in determining eligibility if data in the community assessment supports this decision.

**Income**

Family income information may be gathered and used to prioritize children. For example, after the selection process has been completed and a rank-ordered list has been compiled, income could be used to further rank two children tied for rank-ordering. The use of income to prioritize may be especially helpful when there are not sufficient resources to serve all eligible preschool children. Children should not be identified solely on the basis on family income.

**School-Operated Preschool Programs**

A Title I school may use all or a portion of its Title I funds to operate a preschool program for eligible children.

**Schoolwide Program**

In a Title I school operating a schoolwide program, all preschool children in the school’s attendance area are eligible for services. A Title I school may operate a schoolwide program if a minimum of 40 percent of the students enrolled in the school or residing in the attendance area served by the school, are from low-income families. A Title I school with less than 40 percent poverty may request a waiver from the State Education Agency to operate a schoolwide program. The school does not have to identify particular children as eligible to participate. However, if the school is unable to serve all preschool children who apply, a process for determining which children are served is necessary and should be documented. Schools typically use a selection process like that used by targeted assistance programs.

**Targeted Assistance Program**

In a Title I school operating a targeted assistance program, preschool children who reside in its attendance area and whom the school identifies as at risk of failing to meet the State’s academic achievement standards when they reach school age are eligible for services.

**Coordination with Other Early Childhood Programs**

An LEA or school may use Title I funds to provide preschool services for Title I eligible children to:

- improve the quality or extend the day or number of days for Title I eligible children enrolled in NC Pre-K, Head Start, child care, or other community based early learning programs;
• provide additional services for Title I eligible children enrolled in NC Pre-K, Head Start, child care, or a community based early learning program;
• provide home visiting.

Other Eligibility Considerations

Dual Enrollment
Title I children may be dually enrolled as Title I/State Funded Pre-K (NC Pre-K), as long as the eligibility requirements are met for both programs, with Title I eligibility criteria being considered first.

Automatic Eligibility
Certain children are “automatically eligible” to participate in Title I Preschool (An LEA/school need not identify the child as most at risk of failing to meet the State’s academic achievement standards), including:

• children who participated in Head Start, or attended a Title I Preschool program at any time during the two preceding years;
• children who received services under Title I, Part C (Migrant Education) at any time in the prior two years,
• preschool children experiencing homelessness (NC Homeless Education Program)
• children who are in a local institution or attending a community day program for neglected or delinquent children and youth.

This does not mean these children are automatically enrolled. Programs should attempt to enroll these children whenever possible. If space is not available, programs should collaborate with other early learning partners to attempt to secure services.

Age
Title I Preschool can serve children from birth up to the age at which the LEA provides a free public elementary education. Children in North Carolina who are younger than the age of five by August 31; the kindergarten eligibility cut-off date, are eligible to participate in Title I Preschool. Note: Most schools in North Carolina choose to focus on serving children who are four years old by the eligibility school date. Children who are kindergarten age are not eligible for Title I Preschool.

Children with Disabilities
Children with disabilities who meet the entrance requirements must be considered for eligibility, but do not receive preference in the enrollment process. They cannot be denied consideration based on their disability.

Migrant Children
Migrant children who meet the entrance requirements must be considered for eligibility, but do not receive preference in the enrollment process. They cannot be denied consideration based on their migrant status.

Independent Toileting
Children may not be denied enrollment simply because they are not yet using the toilet independently.

Immunizations
Children must meet the legal requirement for immunizations and provide the documentation required.
INSTRUCTION

Curriculum
Title I Preschool programs must use a comprehensive, research based curriculum that is aligned with Foundations for Early Learning and Development, which provides a common set of expectations for preschool children. The curriculum must support integrated development in all domains of development, including:

- Approaches to Learning
- Emotional and Social Development
- Health and Physical Development
- Language Development and Communication
- Cognitive Development

Along with utilizing a comprehensive, research based curriculum, programs are required to meet, at a minimum, the education performance standards of the Head Start Program Performance Standards Part 1302 Subpart C Education and Child Development Program Services that are aligned with the Head Start Child Early Learning Outcomes Framework Ages Birth to Five.

NC Guide for the Early Years,
The NC Guide for the Early Years, 2nd Edition is an excellent resource and model for local schools to utilize in pursuing high quality. The Guide brings together several resources and gives examples of linking Foundations for Early Learning and Development and the Kindergarten Standard Course of Study Objectives, which can be utilized for planning the curriculum and the learning environment.

Daily Schedule
Instructional days must offer a balance of individual, small group, and large group activities, and allow for sustained creative play. Children must spend one-third of every instructional day engaged in instructional experiences that are embedded in learning centers.

Daily schedules should be designed to establish routines, manage transitions, and allow children to have long uninterrupted time for play both indoors and outdoors. Schedules should be posted for reference by children and adults.

Lesson Plans
Teachers are required to develop lesson plans that include intentional plans. Planning should be comprehensive and include such information as following the interests of the children, appropriate activities, a connection to assessment (individual needs of children), and a connection to Foundations.

Formative Assessment Process
To monitor children’s progress, Title I Preschool programs are required to conduct assessments on every child throughout the year. Assessment instruments must be valid, reliable, culturally sensitive, and administered individually by trained personnel. Information gathered through the assessment process should be used to inform instruction and plan learning experiences that address the specific needs of individual children. To support this alignment between assessment and instruction, use of assessment instruments aligned to the curriculum selected for use by the program is ideal.

To support the use of assessment to inform instruction, teachers in Title I Preschool programs are encouraged to maintain a portfolio for each child. The purpose of the portfolio is to document growth over the course of a school year. Portfolio contents should include, but are not limited to:
• Work samples that document development, including items such as photos of child created products (e.g., block creations, sculptures, dramatizations, child interviews) actual (or electronic copies) developmental writing samples, artwork, or other items that document child development.
• Anecdotal records, including notes collected during observations of child behaviors that demonstrate developmental progress/achievements.
• Inventories for recording specific behaviors and skills, such as Teaching Strategies Gold, High Scope – Preschool Child Observation Record, Work Sampling System, etc. should be used. Title I Preschool programs with NC Pre-K children enrolled in classes can utilize Teaching Strategies free of charge through funding provided by the Preschool Development Grant administered by the Division of Child Development and Early Education. Title I Preschool programs (and other public preschool classes) that do not have NC Pre-K children enrolled will be able to utilize Teaching Strategies Gold beginning with the 2021-22 school year free of charge through funding provided by the Department of Public Instruction.
• Notes/communication with families providing input/feedback about their child’s development via school conferences, home visits, electronically, etc.

Portfolios should be kept current and located in the classroom (or available electronically), and available for review by the child’s parent/guardian. At the end of the school year, portfolios for each child should be transferred to the kindergarten classroom that each child is expected to attend.

On-going assessment is the most appropriate means by which a child’s progress is documented. Pre and Post screenings are not necessary, nor are they appropriate for showing progress.

Transition
Title I Preschool programs must have a plan to ensure children have a smooth transition into the preschool classroom and from the preschool classroom into kindergarten. Plans must include how programs will support, coordinate, and integrate Title I services with early childhood education programs. Examples of strategies that support transition may include, but are not limited to:
• Teacher visits to observe children before the move to a new class
• Home visits designed to learn about the children and their families
• Visits by children and families to their new classrooms
• Attendance by children for short periods of time in their new classrooms
• Open house before school begins
• Teacher/Parent/Child conferences
• Staggered entry

In addition to ensuring smooth transitions, Title I Preschool programs can implement strategies to help promote continuity in children’s learning. Examples of strategies that promote continuity may include, but are not limited to:
• Coordination of professional development for preschool and kindergarten teachers so that classroom environments and experiences are similar.
• Collaborative planning to align preschool and kindergarten curricula and goals.
• Classroom visits by kindergarten and preschool teachers to each other’s classrooms.
• Transfer of children’s formative assessment process documentation from the preschool teacher to the future kindergarten teacher.

Staff/Child Ratio and Class Size
A Title I classroom should maintain a maximum staff/child ratio of 1:9. The maximum class size is 18 children, with one teacher and one teacher assistant per classroom.

Programs that provide inclusive settings for children with disabilities may require an adult/child ratio smaller than 1 to 9. For LEA administered public school inclusive classrooms, ratios must be in compliance with the NC Policies Governing Services for Children with Disabilities (Section 1508-2 Class Size: School Age and Preschool).

**STAFFING**

**Teachers**
The State Board of Education requires that all teachers teaching in a public school operated preschool classroom in North Carolina hold either a Birth-Kindergarten or Pre-K Add-On License. [NC State Board of Education Policy Manual LICN-001 Licensure Requirements](http://www.ed.gov/policy/elsec/guid/paraguidance.doc)

**Teacher Assistants**
Title I Preschool teacher assistants are required to meet NCLB’s requirements for paraprofessional requirements. [http://www.ed.gov/policy/elsec/guid/paraguidance.doc](http://www.ed.gov/policy/elsec/guid/paraguidance.doc)

**Professional Development**
Teachers are subject to the North Carolina State Board of Education (SBE) teacher licensure policy and procedures, which requires teachers to participate in orientation, training, and on-going professional development activities. Professional development for Title I Preschool teachers includes activities that are high quality and impact instruction. Professional development should be on-going, based on scientific research, and aligned with Foundations. Professional development should be regularly evaluated for effectiveness.

Title I funds may be used for professional development for early childhood professionals who serve Title I eligible children. Title I funds may also be used for PD 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. The purpose must be to improve coordination and/or support transition. [http://www.ncpublicschools.org/licensure](http://www.ncpublicschools.org/licensure)

**FAMILY ENGAGEMENT**
Title I Preschool programs are required to involve families in meaningful ways in the education of their child, with a goal of shared decision-making. The LEA’s and school’s written family engagement policies apply to Title I Preschool families. In fulfilling family engagement requirements, LEAs and schools must provide opportunities for full participation of parents with limited English proficiency, parents with disabilities, and parents of migratory children to the extent feasible and practical. Title I Preschool staff should ensure communication with families occurs in the primary language of the family.

Families are integrally involved in the learning and development of their child(ren); therefore, the development of a comprehensive plan for family engagement is critical to the success of children during preschool and subsequent years. In an effort to support family engagement, programs should develop a plan to implement strategies designed to develop partnerships with families and build reciprocal relationships that promote shared decision-making. Meaningful family engagement occurs when early childhood programs and other community organizations and
agencies actively reach out to families in meaningful ways, and when families actively support their child(ren)’s learning and development.

Teachers should work with families to develop a plan for summer or other vacation periods between preschool and kindergarten to allow the child to continue an instructional program and prevents the loss of previously acquired skills.

Administrators and teachers should provide meaningful opportunities for parents and families that build reciprocal relationships and foster a bond among those involved in the education of the preschool child. Relationship-building experiences that promote ongoing, two-way communication and use a variety of methods that reflect the linguistic preferences of the family are encouraged. Following are some examples that are encouraged:

- Home visits (initial and ongoing), particularly for purposes of learning about the child, his/her family, and family routines.
- Multiple opportunities for formal and informal conversations where both parents and teachers share their knowledge and expertise (two way communication), (e.g., phone calls, emails, texts, parent/teacher conferences).
- Classroom visits and options for parents and families to participate in classroom activities.
- Parent education (e.g., development of parent centers, one-on-one learning opportunities, skill development classes, and identification and connections to community resources such as “Parents as Teachers”).
- Family involvement in decision making about their own child and about their child’s early childhood program in general.
- Opportunities to engage families outside of the regular school day.

**Title I Parental Involvement**

**NCDPI’s Parent and Family Involvement Guide**

**MONITORING**

The monitoring of federal programs administered by the North Carolina Department of Public Instruction ensures that all children have a fair, equal, and significant opportunity to access a high-quality education. Additionally, monitoring provides oversight of local programs to ensure compliance with federal regulations and to guard against waste, fraud, and abuse. Title I Preschool monitoring is conducted as part of the Federal Programs Cross Program Monitoring. The following areas are monitored for preschool programs:

- Selection of children
- Instruction
- Fiscal
- Family engagement

**Title I Preschool Monitoring**

**Federal Programs Cross Program Monitoring**

**Materials and Equipment**

Materials and equipment purchased with Title I funds are to be used solely for children in the targeted assistance program.

**Title I Allowable Expenses**

- Salaries and benefits for teachers, teacher assistants, and other staff
- Substitute pay
• Professional development for early childhood professionals who serve Title I eligible children
• Developmentally appropriate indoor/outdoor learning materials, supplies, and equipment
• Electronic devices
• Nutritious snacks
• Home visits
• Field trips
• Family engagement activities
• Comprehensive services
• Developmental Screenings
• Transportation
• Full day, full-year services

Supplement Versus Supplant
Title I Preschools must supplement and not supplant district responsibilities. Title I funds and services must supplement and not supplant programming. This means that a school may not use Title I funds to perform a service that would normally be paid for with local or state dollars.

Certification Forms
Teachers with full-time assignments in Title I Preschool classrooms must sign certification forms documenting that 100% of their time is directed to instructional services for preschool students. This applies to teachers funded solely with Title I funds, as well as teachers whose salaries are paid from blended funds.

OTHER PROGRAM CONSIDERATIONS

Location
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).

Length of School Day/Year
Services in Title I Preschool should be sufficiently intensive to allow more time for children to benefit from cognitive experiences. Preschools that operate for a full day, on a year-round basis, or have provided children with two years of preschool, show better results than those that offer less intense services; therefore, Title I funds should be used to serve children, in full day programs (6-6.5 hours per day) to provide participating children the greatest opportunity for growth and success. These programs should follow the school calendar. The total number of instructional days may be slightly reduced if programs use one of the following practices:
• Staggered entry
• Home visit days
• Professional development days

If the LEA wishes to operate a half-day program or less than a five day week program, justification for such should be included in the grant application for Federal programs.

Any Title I funded transition activity that includes a summertime “readiness” component, such as programs like “KinderCamp” or “Jump Start,” should be tied to a longer-term strategy that
supports parents and children during the entire year before kindergarten. Short term “Kindergarten Readiness” programs for children are not an effective strategy to use when the activity outcome is to fully prepare or “ready” children for the expectations of kindergarten.

Transportation
While transportation is not a mandated service, providing transportation ensures access to the Title I Preschool program. Providing transportation is a local decision and is an allowable expenditure.

US Department of Transportation (child safety restraint systems in school buses)

Child Care Licensing
Public schools are exempt from regulation by the NC Division of Child Development and Early Education. Note: Public schools implementing preschool programs serving NC Pre-K children shall maintain a four or five-star rated license. For new centers, a temporary license will be issued for six months with the expectation of the program achieving a four or five-star license at the end of the temporary time period. Child care rules apply when Title I Preschool programs are operated in conjunction with one or more programs that require child care licensure.

NC Child Care License Requirements

LEA Coordination with Head Start and Other Early Childhood Programs: MOUs
The ESEA, as amended by the Every Student Succeeds Act (ESSA), requires LEAs receiving Title I funds to develop agreements with Head Start and, if feasible, other early childhood development programs, such as Exceptional Children, NC Pre-K, and private childcare, to increase coordination. The Head Start Act also requires Head Start programs to enter into agreements with LEAs and other early childhood providers. The goal of this coordination is to provide higher quality learning experiences and a more seamless transition to kindergarten. Agreements should be tailored to suit the community's unique needs and consider a comprehensive approach, rooted in best practices. Agreements must be developed, and coordination activities executed, regardless of whether the LEA operates a Title I Preschool program. Required coordination activities include:

- 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.

Agreements must be uploaded into CCIP (Comprehensive Continuous Improvement Plan), which is a web based planning and grants management tool, each year.

LEA Head Start Coordination Guidance
MOUs: LEAs and Head Start Programs Regional Meetings

Children and Families Experiencing Homelessness: Coordination of Services
The ESEA, as amended by the ESSA, reauthorized the McKinney-Vento Education for Homeless Children and Youths program, which protects and serves homeless students. The amended
McKinney-Vento Act adds protections for preschool children and equips local partners with an essential tool for implementing the new provisions in ESSA.

ESSA and Head Start Program Performance Standards (HSPPS) share the McKinney Vento definition of homeless children and require LEAs and Head Start programs to coordinate and establish collaborative relationships and partnerships with community organizations. Children are automatically eligible for Head Start and Title 1 Preschool. Coordination to determine eligibility and to identify and enroll children consistently across programs, as well as coordinate referrals for services, is necessary to improve education and other outcomes for children and their families.

Agreements related to the coordination of services for families and children experiencing homelessness are recommended and should be tailored to suit the community’s unique needs and reflect a comprehensive approach, rooted in best practice. Although written agreements are not required, they serve as a way of formalizing the partnership. Head Start and ESSA have requirements that relate specifically to the coordination of services for children experiencing homelessness and are aligned with NC’s LEA/Head Start Coordination Guidance document. LEAs, Head Start, and other early learning partners should use the activities listed in the NC Early Learning Homeless Coordination Guidance document to coordinate services for children and families experiencing homelessness.

NC Homeless Education Program: Supporting Early Childhood

Reporting
The number and percentage of children enrolled in preschool programs must be included on the LEA’s report card.

SOURCES/RESOURCES
Title I Part A ESEA
Non-Regulatory Guidance Early Learning in the Every Student Succeeds Act
Head Start Performance Standards - Applicable to Title I Preschool Programs
EducationCounsel What is a Title I Preschool Program?
CLASP FAQ: Using Title I of ESEA for Early Education
Title I Preschool: NCDPI Office of Early Learning
NCDPI Federal Programs
NC Early Childhood Foundation: Advancing Early Learning Through ESSA
NC Homeless Education Program: Supporting Early Childhood
Foundations for Early Learning and Development
NC Guide for the Early Years, 2nd Edition
NAEYC's Developmentally Appropriate Practice Position Statement