Leveraging Federal Formula Grants to Support Early Learning

Office of Federal Programs Guidance
September 2021

This guidance document informs local education agencies (LEAs) about the possible uses of federal funding to support early learning activities. In December 2015, the Elementary and Secondary Education Act (ESEA) was reauthorized through the Every Student Succeeds Act (ESSA). The new act places special emphasis on early learning and prekindergarten education. Improving early learning programs aligns with the strategies of Ohio's Strategic Plan, *Each Child, Our Future*, to create partnerships and expand quality early learning.

Title I, Part A – Needs Assessment and Planning

The use of Title I, Part A 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, Part A, 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 building-level Title I, Part A programs.[1]

Funding Preschool Programs with Title I, Part A

An LEA or school that receives Title I, Part A may use its Title I, Part A funds to support a district-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.[2]

Title I, Part A 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, Part A 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.[3]

District-Operated Programs

A district-operated program must operate under a Targeted Assistance model. If the district budget cannot support a districtwide preschool, a district may choose to serve preschool children who reside in specific Title I, Part A school attendance areas rather than serve the whole district.

[1] ESEA, Sec. 1112 (b)(8)
[2] ESSA, Sec. 1113 (c)(5)
[3] ESEA section 1115(c)(2)

School-Operated Programs

Schoolwide: A school that operates a Title I, Part A schoolwide program may use funds available under Title I, Part A to establish or enhance preschool programs for children under 6 years of age.[4]

Targeted Assistance: Like a K-12 targeted assistance 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. Those criteria may include data from parent interviews, judgements of teachers and developmentally appropriate measures of child growth.

Compliance

An LEA or school that uses Title I, Part A funds to operate a preschool program must comply with the same requirements that apply to all Title I, Part A programs. Those requirements include:

- Evidence of Parent/Family Engagement
- Evidence based program design and annual evaluation
- Targeted Assistance: 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.[5]

Coordination with Community Preschool Programs

An LEA or school may use Title I, Part A funds to improve the quality or extend the day or number of days of state preschool, Head Start, child care or other community-based early learning programs for eligible children.

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, Part A 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, child care 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, Part A-funded programs. An LEA's written parent and family engagement policies should include plans to coordinate and integrate parental involvement strategies under Title I, Part A with public preschool programs, Head Start and other early learning programs.

[4] ESSA, Sec. 1114 (c)
[5] ESEA, Sec. 1112 (c)(7)

Supporting Improved Early Childhood Instruction with Titles I, II and III

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

Title I, Part C: Migrant Education Program funds can be used to offer professional development to staff to enhance understanding of the migratory lifestyle.

Title II, Part A: LEAs may use funds to increase the knowledge base of teachers, principals or other school leaders on instruction in the early grades and strategies to measure whether young children are progressing. In addition, funds can be used on activities designed to expand the abilities of principals or other school leaders to support school and preschool program educators to meet the needs of students through age 8, including through joint professional learning and planning activities that address the transition to elementary school.[6]

Title III, Part A: Institutions of higher education or public or private entities (in consortia with the state education agency or LEAs) may use funds to support professional development strategies that promote school readiness of English learners and their transition from early childhood education programs to elementary school.[7]

Other Options for Supporting Early Childhood Education

Title I, Part C: Migrant Education Program funds can be used to provide preschool services to eligible migrant students ages 3-5. Funds also can be used to provide parents and families with resources on supporting kindergarten readiness in the home.

Title III, Part A: Grants can be used to implement effective preschool language instruction and educational programs that are coordinated with other relevant programs and services.[8]

Title IV, Part A: Title IV, Part A is a flexible grant that allows for cross-cutting programs for well-rounded education, safe and healthy schools, and effective use of technology. A district could use its Title IV, Part A funds to support early childhood education transitions in innovative ways

Compliance – Tracking the use of Federal Funds

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.

[6] ESSA, Section 2103 (b)(3)(G)
[7] ESSA, Section 3102(3)
[8] ESSA, Section. 3115 (d)(4)

Please refer to the UGG and the Office of Federal Programs spending guides for detailed information on the additional requirements for each grant.

Funding Sources to Support Early Childhood Education[9]

Title/Section	Instance	Required	Allowable/Possible
Title I, Part A Sec. 1114(c)	Schoolwide Program Preschool Programs		A school that operates a schoolwide program may use funds to establish or enhance preschool programs for children under 6 years of age.
Title I, Part A Sec. 1115(b)(2)(C)	Targeted Assistance School Program		A targeted assistance school may use funds to assist preschool children in the transition from early childhood education programs to elementary school programs.
Title I, Part A Sec. 1116(a)(3)(D)(i)	Parent and Family Engagement		An LEA may use funds reserved for parent and family engagement 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.
Title I, Part A Sec. 1119(a) and (b)	Coordination with Early Childhood Programs	Each LEA receiving Title I, Part A funds must develop agreements and carry out coordination activities with Head Start agencies and, if feasible, other early childhood development programs.	
Title I, Part C Sec. 1304(c)(4)	Migrant Education	The state must provide an assurance that it has and will address the unmet education needs of preschool migratory children.	

[9] Non-Regulatory Guidance Early Learning in the Every Student Succeeds Act: Expanding Opportunities to Support our Youngest Learners

Title II, Part A Sec. 2103(b)(3)(G)(i) and (ii)	LEA Uses of Funds Activities		LEAs may use funds to increase the knowledge base of teachers, principals or other school leaders on instruction in the early grades and strategies to measure whether young children are progressing. Funds can be used on activities designed to expand the abilities of principals or other school leaders to support school and preschool program educators to meet the needs of students through age 8, including through joint professional learning and planning activities that address the transition to elementary school.
Title II, Part A sec. 2103(b)(3)(J)	LEA Uses of Funds Activities		LEAs may provide training to support the identification of students who are gifted and talented and the implementation of instructional practices that support the education of such students, including early entrance to kindergarten.
Title III, Part A Sec. 3115	Subgrants to Eligible Entities		Grants may be used to develop and implement effective preschool, elementary school or secondary school language instruction educational programs that are coordinated with other relevant programs and services. Use of funds must be supplemental to other federal, state or local funds.
Title III, Part A Sec. 3131 (c)(1)(C)(6)	National Professional Development Project		Institutions of higher education or public or private entities (in consortia with the state or LEAs) may use funds to support professional development strategies that promote school readiness of English learners and their transition from early childhood education programs to elementary school.

Title IV, Part A	Student Support and Academic Enrichment Grants		Grants may be used to improve students' academic achievement by increasing the capacity of states, LEAs, schools and local communities to (1) provide all students with access to a well-rounded education; (2) improve school conditions for student learning; and (3) improve the use of technology to advance the academic achievement and digital literacy of all students. Grants may support students in all grades.

Additional Resources

- U.S. Department of Education guidance on Expanding Opportunities to Support our Youngest Learners
- U.S Department of Education guidance on the Uniform Grant Guidance