

## **Title I, Part A: Parent and Family Engagement FAQ**

### **U.S Department of Education Clarification**

**Q1: In Vermont, the term “policy” commonly denotes a document that requires school board approval. We appreciate, however, that ESSA may not require school board approval of individual school parent and family policies/may not define “policy” the way that Vermont LEAs do. Under ESSA, do school PFE policies require school board approval?**

**A1:** Under ESEA section 1116(a)(2), an LEA that receives Title I funds must "develop jointly with, agree on with, and distribute to, parents and family members of participating children a written parent and family engagement policy" (PFE) consistent with requirements in that section. The LEA's parent and family engagement policy must be incorporated into its Title I plan developed under ESEA section 1112 (ESEA section 1116(a)(2)), and the State educational agency (SEA) must review it to determine if it meets the requirements of ESEA section 1116 (ESEA section 1116(h)). In general, the ESEA does not specify that PFE written policy requires school board approval. Therefore, school board approval would only be needed if in Vermont, this approval is necessary in order for a school district to have a Title I family engagement written policy that complies with ESEA section 1116.

**Q2: Some parties interpreted ESSA Sec. 1116(b)(3) as giving permission to participating schools to adopt the LEA’s Parent and Family Engagement policy as their school policy (vs. drafting a separate policy), so long as the LEA policy met all requirements. Is this correct, or does an individual, school-specific policy for each participating school need to be drafted?**

**A2:** Under ESEA section 1116(b)(1), each school served by Title I in an LEA that receives Title I funds also must develop a written parent and family engagement policy, consistent with requirements in ESEA section 1116(b)-(f). Like an LEA, each Title I school must "jointly develop with, and distribute to, parents and family members of participating children a written parent and family engagement policy, agreed on by such parents." As part of that policy, each Title I school must jointly develop with parents for all children served under Title I a school-parent compact that outlines how parents, the entire school staff, and students will share the responsibility for improved student academic achievement and the means by which the school and parents will build a partnership to help children achieve the challenging State academic standards. These school-based requirements contemplate involvement and agreement among families, school staff, and students in each school that reflect the unique needs of the school. ESEA section 1116 does not preclude an LEA from consolidating its LEA and each school parent and family engagement policy into one comprehensive LEA policy. And an SEA has the flexibility to create an optional template for its Title I LEAs to use to develop such a

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comprehensive LEA/school policy. Accordingly, any template would need to recognize these differences and address all requirements for an LEA parent and family engagement policy as well as each school's individual parent and family engagement policy. In other words, a template could broadly outline the necessary requirements but would need to be flexible to accommodate school-level plans that reflect the uniqueness of their school communities. An LEA or SEA must be mindful, as section 1116 makes clear, that the requirements at the LEA level are different and distinct from those at the school level; they involve different actors, serve different audiences, and reflect different needs.

## **Parent and Family Engagement Policy FAQs**

### **Q3: Can we just cut and paste the Model Policy or Template?**

A3: Due to the requirements outlined in ESSA section 1116, the LEA PFE policy, School PFE procedure, and School-Parent compacts must be jointly developed and agreed on with parents and family members of participating children and specifically notes that parents are to be included in the planning, review, and improvement of the school parent and family engagement procedure, and joint development of the schoolwide program plan (if applicable). Implementation is also meant to be geared specifically to individual LEA and School needs as determined by Title I Parents and Families, and thus requires a more collaborative process.

## **Spring 2020 PFE Training FAQs**

### **Q4: Do you have model policies to share with us?**

A4: The Title I, Part A Parent and Family Engagement Guide contains template policies, not a model. Within the template there are some things to consider, including examples on what you might include in the policy for each requirement, but there is not a definitive model. Formatting and the needs of the LEA/school will need to be edited to fit the specific LEA/school after parent and family outreach is conducted.

### **Q5: We only have supervisory union policies. Individual schools do not have their own policies, they have documented procedures/ administrative regulations that support implementation. We are assuming that still works?**

A5: According to ESSA, each school receiving Title I, Part A funds must have its own School Parent and Family Engagement Policy that includes descriptions of how the school will implement all requirements outlined in section 1116(b)(1) of the statute. Given the clarification from U.S. Department of Education VT has chosen to accept these requirements and School Procedures and you will note they are labelled as such within the PFE Templates and guide.

### **Q6: Where is the template found?**

A6: Within the Title I, Part A Agency of Education subpage and within the PFE Guide.

### **Q7: We host these [Annual Title I Meetings] prior to a big school event, otherwise no one comes. That is not allowable?**

A7: Yes, this is still allowable, as long as the Title I meeting is advertised as a solo event and occurs at a separate timeframe— “prior to” or “after” another event is fine. Also, it’s important

to be mindful of which parents and family members would be invited to the meeting, particularly if it is a Targeted Assistance school.

**Q8: The Title I Meeting is annual. Is there an expectation that this meeting happens at a certain time of year?**

**A8:** Great question. ESSA does not require a specific time of year. However, we strongly encourage schools to hold these meetings in the beginning of the school year, as the purpose of the meeting is to make sure parents understand the Title I program. Best practice would be to hold them in the fall. Another option is to hold them twice a year, once in the fall and again in the spring to review effectiveness of the program.

**Q9: COVID-19 interrupted some annual meetings. What do we do?**

**A9:** Continue to try to hold these meetings through a virtual platform, if possible. If it is not possible, document what the circumstances were and that the effort was made.

## **Annual Title I Meeting FAQs**

**Q10: Do our Title I parent meetings need to be in person, virtual or both?**

**A10:** Our understanding is that nothing in statute or guidance mandates that the annual Title I meeting at each school be held in person. ESSA (Section 1116) does emphasize that schools should make efforts to promote parent participation in ways such as offering multiple meeting opportunities at different times of day, providing accommodations such as child care or transportation as needed, or similar. I am of the mind that a shift towards virtual meetings will likely increase participation, particularly at this moment in time, but schools should consider new barriers that may be created by taking a purely digital approach to announcing and hosting meetings, such as for families with limited broadband access. Long story short, a virtual meeting at each school should be ok, but please be mindful of accommodating as many parents and families as possible in this approach.

**Q11: What is the purpose of the annual Title I meeting?**

**A11:** The purpose of the annual Title I meeting is to provide information about the school's Title I program, the school's requirements under Title I, and parent's rights to be involved in their children's education.

**Q12: Who should be invited to the annual Title I meeting?**

**A12:** All parents of children participating in Title I-funded services must be invited and encouraged to attend the meeting. If the school operates a targeted assistance program, only parents of those students eligible to receive Title I services should be invited to attend. If the school operates a schoolwide program, parents of all students should be invited.

**Q13: Who should conduct the annual Title I meeting?**

**A13:** The Title I meeting may be conducted by any of the following individuals: Principals, Assistant Principals, Consolidated Federal Programs Team Leaders, Curriculum Directors, Parent and Family Engagement Liaisons, any other school staff with in-depth knowledge of Title I, Part A requirements.

**Q14: What information must be covered at the annual Title I meeting?**

**A14:** ESSA requires that schools distribute the following information at the meeting:

- An explanation of the school’s participation in Title I (targeted assistance or schoolwide)
- Information about the requirements under Title I, Part A
- Information about parents’ rights to be involved.

ESSA also requires the following items but does not specifically require that these discussions take place at the Title I annual meeting. Best practices would suggest that the Title I meeting is a good opportunity to discuss these items as parents and family members are already in attendance:

- Development of the LEA and school-level parent and family engagement policies
  - Development of the School-Parent Compact
  - Opportunities for parents to attend regular meetings to participate, as appropriate, in decisions relating to the education of their children
  - Information about what it means to be a Title I school
  - How Title I funds are allocated
  - What Title I funds can be used for
  - An explanation of the school’s curriculum
  - An explanation of the school’s academic assessments used to measure student progress
  - An explanation of the proficiency levels that students are expected to meet
  - Information on the Continuous Improvement Plan
  - Opportunities for parent involvement
  - School communication plan (how will information relating to the Title I program be distributed throughout the year, how will parents have access to their child’s educators, etc.)
- There is no required format for the distribution of material, as long as all parents of participating children can fully access and understand the information provided. Schools may consider a combination of presentation, printed materials, facilitated round table discussions, and questions and answer formats.

**Q15: Can the annual Title I meeting be combined with another event?**

**A15:** No. The sole purpose of the annual Title I meeting must be to provide information on the school’s Title I program. The school may hold the Title I meeting before or after another school event, but the Title I meeting cannot be combined with or embedded into any other event (for example, the school open house, PTA meetings, etc.)

**Q16: Can several Title I schools within a district hold one meeting together?**

**A16:** No. Each school must hold its own annual Title I meeting and distribute the required information specific to that school.

**Q17: Does the school need to provide translation services at the meeting?**

**A17:** ESSA requires that schools must provide opportunities for the informed participation of parents and family members, including parents and family members who have limited English proficiency, parents and family members with disabilities, and parents and family members of migratory children. Therefore, schools must provide information to limited English proficient parents orally in a language they can understand, and auxiliary aids and services

(sign- language, large print format, etc.) as requested by parents to ensure meaningful participation in Title I programs and activities.

**Q18: Is the school required to host an annual Title I meeting for private schools?**

**A18:** All LEAs are required to provide equitable services to private schools receiving Title I, Part A funds. This includes ensuring that teachers and families at private schools participate in parent and family engagement activities. The school does not have to host an annual Title I meeting for a participating private school; however, the school must ensure that families of participating children receive all required information about the Title I program at their private school and understand their rights to be involved.

**Q19: Is the school required to keep documentation of the annual Title I meeting? How?**

**A19:** Yes. The school must be able to show documentation of the following:

- All parents of participating children were invited and encouraged to attend
- All required information was distributed
- Translation was provided, as necessary

The LEA must be able to show documentation that all Title I schools held an annual Title I meeting. Documentation must be dated and **may** include the following:

- Invitations/announcements
- Sign-in sheets
- Meeting agendas
- Meeting minutes
- Handouts/materials from the meeting
- Other documents that show all parents of children receiving Title I services were invited to attend the meeting and all required information was distributed.

**Q20: How can schools encourage parents and family members to attend the annual Title I meeting?**

**A20:** Schools may consider the following ways to remove barriers for parent participation and encourage parent and family involvement in the annual Title I meeting:

- Offer a flexible number of meetings, such as meetings in the morning or evening
- Provide transportation
- Provide childcare
- Provide light refreshments (pizza, salad, baked goods, coffee)
- Provide home visits for parents unable to attend
- Hold the annual Title I meeting at a convenient time
- Avoid the use of formal and complicated educational language – ensure that any information going out to parents is easy to understand

**Q21: Can schools pay parents to attend a Title I meeting?**

**A21:** No. Schools may choose to provide transportation, refreshments, and childcare in order to increase parent attendance; however, schools may **NOT** pay parents a stipend of any kind to attend the Title I meeting.

## **Accessibility FAQs**

### **Q22: What are the accessibility requirements per ESSA?**

**A22:** LEAs and schools, to the extent practicable, must provide opportunities for the informed participation of parents and families (including parents and family members who have limited English proficiency, parents and family members with disabilities, and parents and family members of migratory children), in a format and in a language such parents understand (1116(f)). All parents and family members of participating children have a right to receive information about the academic achievement of their children and a right to participate in the programs, services, and activities funded by Title I. LEAs and schools are responsible for ensuring any information distributed to parents and family members who have limited English proficiency, disabilities, or are migratory is presented in a format or language those parents can understand.

### **Q23: What does “to the extent practicable” mean?**

**A23:** Whenever possible, LEAs and schools must provide a written translation of any printed materials or information in a language that parents of limited English proficiency can understand. If it is not practicable to provide a written translation, LEAs and schools must provide the same information orally in a language those parents can understand. It may be necessary for LEAs and schools to use a combination of oral and written translations in order to effectively distribute information; LEAs do have flexibility in determining what combination of translations the LEA and school will use.

### **Q24: What methods of translation can LEAs and schools use?**

**A24:** LEAs and schools have a responsibility to communicate the same information to parents and family members who have limited English proficiency as they would to parents and family members who are English proficient. Therefore, any information that is communicated orally to parents and family members who are English proficient, must also be provided orally to parents and family members of limited English proficiency in a language those parents can understand. LEAs and schools must provide written translations of printed materials in a language that parents and family members who have limited English proficiency can understand. If it is not practicable to provide written translations of all printed materials, LEAs and schools must provide an oral translation in a language those parents can understand to ensure that they receive the required information.

### **Q25: What information must the LEA and/or school translate?**

**A25:** Parents and family members who have limited English proficiency have a right to receive any and all information as required under Title I. This includes distributing any information and school reports required by the State Plan, as well as providing opportunities for the informed participation with their child’s education as outlined in the parent and family engagement section 1116 of ESSA.

**Q26: Does the LEA and/or school have to provide translations even if the child is proficient in English?**

**A26:** Yes. The LEA and/or school must provide translations of written or oral materials to parents and family members who are not English proficient even if their child is proficient in English.

**Q27: Can the child of a parent with limited English proficiency provide translations?**

**A27:** No. Translations must be provided by an appropriately trained individual; LEAs and schools may not ask children, other students, or untrained staff to provide translations.

**Q28: What are LEAs and schools required to provide for parents and family members with disabilities?**

**A28:** LEAs and schools have a responsibility to ensure that any information communicated to parents without disabilities is also effectively communicated to parents with disabilities by providing the necessary aids and/or services as requested by those parents that allow them to understand the material.