



**Using On My Way Pre-K (OMWPK), Child Care Vouchers, Title I Preschool,
and/or Part B Developmental Preschool Together
Frequently Asked Questions**

Number	Question	Answer
1	How can OMWPK funds be used in conjunction with other preschool funding, such as Title I or Part B funding?	<p>Funds may be used by:</p> <ul style="list-style-type: none">● Providing OMWPK funding in non-Title schools;● Braiding OMWPK, Title I, and Part B funds in same school/classroom;● Moving from funding preschool with Title I to OMWPK, freeing up Title I dollars for supplementing the preschool program;● If Title I currently supports a half or alternating day program, using OMWPK can increase services to full day and/or every day;● Expanding the total number of classrooms, all supported by various funding streams, including family tuition payments, OMWPK, Child Care Vouchers (CCDF), Title I, and Part B;● Extending the daily program for additional time (e.g., half day to full day) using various funding streams to support the extension;● Increasing the number of program days, using various funding streams to support the increase;● Increasing the quality of the program;● Using educational fund dollars to provide services at times OMWPK or Title I is not operating; and● In addition to supporting children participating in a Title I preschool program, school corporations may use Title I funds to complement or extend Head Start programs, child care, state-funded preschool programs (e.g., OMWPK), or other community-based early learning programs for at-risk children.¹
2	Are students eligible for Title I also eligible for OMWPK and vice versa?	<p>Eligibility for OMWPK funding is based on the income levels of the family and the ability to demonstrate a need for care. (e.g., The family is working, searching for work, or in school.) Children eligible for Title I might not always qualify for OMWPK funding under these requirements. If they do not, Title I funds may be used to provide services to students eligible for Title I funding who are not eligible for OMWPK services. Not all OMWPK-eligible children are eligible for Title I, as they may not be considered most at-risk of failing to meet the state standards.</p>
3	What funding should schools choose if a student is	<p>Title I funds can be used to serve eligible students. If some students are also eligible for OMWPK funding, the school corporation could opt to use Title I funds to:</p> <ul style="list-style-type: none">● Extend the daily program for an additional amount time, noting

¹ USED Non-Regulatory Guidance: <https://oese.ed.gov/files/2020/07/essaelguidance10202016.pdf>



	<p>eligible for both Title I and OMWPK?</p>	<p>many families need a full day program to allow them to work or attend classes themselves;</p> <ul style="list-style-type: none"> ● Increase the number of days in the program; ● Increase the quality of the program; ● Provide services at times OMWPK programming is not operating; ● Enrich services through the provision of extra personnel to work with Title I-eligible children; ● Provide additional space/classrooms for students; Title I funds may provide educational services for children who are eligible for both Title I and OMWPK with OMWPK funds providing other services. <p>Title I funds may supplement or expand existing early learning programs, including state-funded preschool (e.g., OMWPK), child care, and community-based early learning programs for children who are also eligible for Title I services. OMWPK funding is considered “last dollar in”. For example, if Title I pays for the first half of the day, the OMWPK funding could pay for the second half. Finally, school corporations must show that the OMWPK funding is supplemental to the Title I funds.</p>
<p>4</p>	<p>May a school corporation use Title I funds to expand or enhance other existing public preschool programs?</p>	<p>Yes. Consistent with ESEA section 1112(b)(1)(K), a school corporation may use Title I funds to support existing preschool programs, such as Head Start or other comparable publicly-funded preschool programs. However, if Title I funds are used to expand or enhance an existing public preschool program, that program is then considered to be a Title I program, and all Title I requirements apply, including state education agency (SEA) and school corporation oversight of the program and requirements for eligible children.</p>
<p>5</p>	<p>Could Title I funds be used for capital expenses to upgrade parts of a building to become Paths to QUALITY (PTQ) Level 3 or 4, required to participate in OMWPK?</p>	<p>There are several requirements for PTQ, many of which are already required for public school buildings and would not be an additional cost. Title I funds used for preschool must be reasonable, allocable, necessary, and must be in compliance with federal fiscal guidance. Title I funds are not generally allocable for construction projects; however, Title I funds can be used to purchase furniture and other materials for a new classroom serving eligible students.</p> <p>Expenses such as major remodeling and renovations are the school corporation’s responsibility and are not allowable uses of Title I funds.</p> <p>34 C.F.R. § 76.533 prohibits the use of program funds, including Title I, Part A funds, for construction “unless specifically permitted by the authorizing statute or implementing regulations for the program.” No such authority exists for Title I, Part A. Interpreting this prohibition relies largely on the definition of “construction” used in the 1988 reauthorization of the ESEA, which contained the most-recent definition of construction applicable to ESEA programs. That definition defines “construction” as “the preparation of drawings and specifications for school facilities; erecting,</p>



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		<p>building, acquiring, altering, remodeling, improving, or extending school facilities; and the inspection and supervision of the construction of school facilities.” This broad definition includes activities commonly defined as “renovation.”</p> <p>Minor building alterations may be allowable and school corporations should contact IDOE’s Title I Grants staff prior to beginning the project.</p> <p>34 C.F.R. § 77.1(c) defines minor remodeling as “minor alterations in a previously completed building,” including “the extension of utility lines, such as water and electricity, from points beyond the confines of the space in which the minor remodeling is undertaken but within the confines of the previously completed building.” The definition specifically excludes “building construction, structural alterations to buildings, building maintenance, or repairs.”</p> <p>Rewiring to support technology may be allowable to the extent that the wiring is necessary to support technology otherwise allowable under Title I, Part A (see B-7) and is consistent with the definition of “minor remodeling.”. Contact your grants management specialist with questions regarding if funding is allowable on a project.</p>
6	<p>Would there be any issue of supplanting if OMWPK funding ended and a school corporation seeks to use Title I funds to fund Pre-K again?</p>	<p>No, if the school corporation can do the following, there would not be an issue of supplanting:</p> <ul style="list-style-type: none"> ● Show the program cannot continue without Title I support. ● Show the need for the program. <p>If the school can demonstrate that it would not have provided the services in question with non-federal funds had the federal Title I funds not been available.</p>
7	<p>Do Title I funds have to be used to pay preschool teachers’ salaries if their classrooms include children using a variety of funding streams, including Title 1 tuition funding?</p>	<p>No, Title I funds do not have to be used to fund teacher salaries. Only eligible students’ (e.g., those who live in the geographic attendance area of Title I served school) tuition could be paid for with Title I funding.</p>
8	<p>How is OMWPK</p>	<p>The Case Conference Committee (CCC) should determine placement (and</p>



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	funding allocated for preschool students with an Individualized Educational Plan (IEP)?	the number of hours) based on the least restrictive environment (LRE). Any need outside of those hours the parent is unilaterally enrolling a child in pre-k services. In this case, the school corporation only covers the cost of the number of hours, if any, determined necessary by the CCC. Additional funding that the student qualifies for can be used for the remaining costs.
9	If a CCC determines the LRE is in a general early childhood program, and they do not offer a general early childhood program in the district, what does that look like?	The school corporation may contract or “buy seats” from a community-based program, including a Head Start program or OMWPK program. The school pays the regular early childhood program for the amount of time the CCC determines is needed for the child to attend. Community based programs and schools should collaborate to discuss how to best meet the needs of the child in regards to professional development for community-based providers and necessary support related to the IEP. Community-based providers may also consider seeking support from SPARK Learning Lab or their state licensing consultant. ²
10	Is a school corporation required to provide transportation to OMWPK students?	No, but they may choose to do so. School corporations are required to provide transportation to preschool students with an IEP, which may include OMWPK students. Nothing prohibits a school corporation from providing transportation to all preschool students.
11	Are children with disabilities eligible to participate in a Title I preschool program?	Yes. Children with disabilities are eligible to participate in a Title I preschool program on the same basis as eligible children without disabilities (ESEA section 1115(b)(2)(A)). However, a school corporation may not use Title I funds to provide services to preschool children with disabilities that they are otherwise required by law to receive. This would violate the Title I supplement not supplant requirements (ESEA sections 1114(a)(2)(B), 1120A(b)).

For additional information, please email general questions to teachingandlearning@doe.in.gov, Special Education questions to specialeducation@doe.in.gov, Title I Questions to your [Title Specialist](#), and OMWPK questions to prek@fssa.in.gov.

Version: 2022.5.18

² <https://www2.ed.gov/programs/oseppsg/index.html>