

November 2023

# K-12 EDUCATION

Updated Federal Guidance Would Assist Title I Schools in Meeting Parent and Family Engagement Requirements

# GAO Highlights

Highlights of GAO-24-106143, a report to Congressional Requesters

#### Why GAO Did This Study

Students do better and stay longer in school when families are engaged, according to research.

GAO was asked to study parent and family engagement in Title I schools. This report examines (1) the extent to which Title I schools made required parent and family engagement information available on their websites, (2) how parent and family engagement compares between Title I and non-Title I schools, and (3) the extent to which Education's guidance addresses Title I requirements for parent and family engagement.

GAO reviewed school and district websites for a nationally generalizable sample of Title I schools; analyzed Education's most recent data on parents' views of family engagement (school year 2018–19); and reviewed relevant federal laws and documents on Title I oversight. GAO interviewed Education officials and state and local officials from Nebraska, Nevada, and Tennessee. GAO selected schools and districts in these states for a mix of Title I program type, school type, and locale.

#### What GAO Recommends

GAO recommends that Education update its guidance on Title I parent and family engagement to reflect requirements under current law. Education agreed with our recommendation.

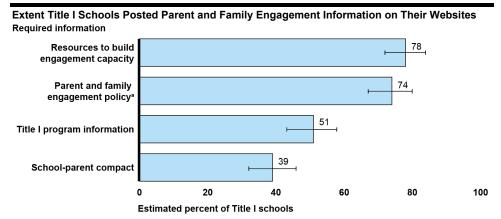
View GAO-24-106143. For more information, contact Jacqueline M. Nowicki at (202) 512-7215 or nowickij@gao.gov.

## K-12 EDUCATION

### Updated Federal Guidance Would Assist Title I Schools in Meeting Parent and Family Engagement Requirements

### What GAO Found

GAO estimates that, nationwide, the information Title I schools most commonly posted online regarding parent and family engagement involved policies and resources for building engagement capacity (see figure). These schools, which generally have high percentages of students from low-income families, are required to conduct certain parent and family engagement activities under Title I, Part A of the Elementary and Secondary Education Act of 1965, as amended.



Source: GAO review of a nationally representative sample of Title I schools and their corresponding district websites. | GAO-24-106143 <sup>a</sup>Findings for parent and family engagement policies include both district and school level policies. Note: The percentages have a margin of error within plus or minus 7 percentage points at a 95 percent level of confidence. Title I requires these policies be made available to the local community. While it does not explicitly require that the policies be posted online, websites are important venues for engaging and informing the public, including families of children attending school.

GAO found little difference in the ways that parents from Title I and non-Title I schools participate in and receive information from their schools and their overall satisfaction with those schools, according to Education's data. For example, parents from both types of schools reported similar attendance at general school meetings and events, such as open houses and sporting events.

To help with implementation of Title I's parent and family engagement requirements, states, schools, and districts can refer to Education's guidance, which was issued in 2004. GAO's review of the decades-old guidance found outdated information about the law as well as missing information about current requirements. For example, the guidance does not specify that districts must prioritize high-need schools when distributing funds for parent and family engagement activities, as required by law. Further, Education's monitoring efforts in 2022 cited Nebraska for not ensuring its districts did this. Education officials acknowledged some misalignment between the guidance and the current law, but said they had no plans to update it and that most of it still applies to current law. State officials GAO interviewed in monitored states said that the guidance's outdated references are confusing. Absent updated guidance, states, districts, and schools may continue to rely on obsolete information to guide their parent and family engagement efforts.

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| Abbreviations |  |
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| ESEA          | The Elementary and Secondary Education Act of 1965, as amended |
| PTA<br>PTO    | Parent teacher association Parent teacher organization         |

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U.S. GOVERNMENT ACCOUNTABILITY OFFICE

441 G St. N.W. Washington, DC 20548

November 6, 2023

The Honorable Virginia Foxx Chairwoman Committee on Education and the Workforce House of Representatives

The Honorable Elise Stefanik House of Representatives

Researchers have found that students have better attendance and behavior, get better grades, and are more likely to graduate when families are involved in their school.<sup>1</sup> During the pandemic, virtual learning provided families with increased visibility into their children's school day. School districts and schools that receive funds under Title I, Part A of the Elementary and Secondary Education Act of 1965, as amended (ESEA), are required to conduct certain parent and family engagement activities.

In fiscal year 2023, an estimated \$18.4 billion was appropriated for Title I to provide financial assistance to districts and schools with high numbers or percentages of children from low-income families. This funding helps to ensure that all children meet state academic standards. Title I districts are generally required to reserve at least 1 percent of their Title I allocation for parent and family engagement activities. Title I districts use these funds to carry out activities and strategies consistent with the district's parent and family engagement policy, but at least 90 percent of the reserved funds must be distributed to Title I schools. In school year 2021–22, more than three-quarters of districts and more than one-half of schools received Title I funds.<sup>2</sup> The Department of Education periodically monitors states, which are tasked with ensuring that districts are adhering to Title I parent and family engagement requirements.

Given the potential impact parent and family engagement can have on children's success, you asked us to review various aspects of Title I's requirements around parent and family engagement. This report examines (1) the extent to which Title I schools made required parent and

<sup>&</sup>lt;sup>1</sup>Anne T. Henderson and Karen L. Mapp, *A New Wave of Evidence: The Impact of School, Family, and Community Connections on Student Achievement* (2002): 7.

<sup>&</sup>lt;sup>2</sup>Excludes schools in California and Guam because they did not report counts of Title I schools as Education directed.

family engagement information available on their websites, (2) how parent and family engagement compares between Title I and non-Title I schools, and (3) the extent to which Education's state monitoring and guidance addresses Title I requirements for parent and family engagement.

To determine the extent to which Title I schools made required parent and family engagement information available on their websites, we reviewed school and district websites for a nationally generalizable sample of Title I schools. This review captured specific information required by Title I related to parent and family engagement. See appendix I for detailed information on our sample and data collection efforts. To determine the extent to which Title I schools in our sample made select documents accessible to families in the languages spoken within the local community, we analyzed data from the U.S. Census Bureau's American Community Survey.

To determine what is known about parent and family engagement in K-12 schools, we analyzed Education's Parent and Family Involvement in Education Survey for school year 2018–19 (most recent). This survey collects information from parents on their experiences with schools, such as their participation in assorted school activities and the types of communications they received. For this data set, we compared the responses associated with Title I schools to those of other schools to identify any meaningful differences. We used Education's Common Core of Data to identify schools as Title I or not.

To determine the extent to which Education's monitoring and guidance addresses Title I requirements for parent and family engagement, we reviewed documents Education uses to monitor state oversight of parent and family engagement requirements as well as related performance reports issued from 2019 through July 2023. We also reviewed related federal laws and guidance and interviewed Education officials.

To deepen our understanding of various aspects of parent and family engagement, we interviewed state and local education officials in Nebraska, Nevada, and Tennessee—the three states where Education had findings from its monitoring efforts related to parent and family engagement from 2019–2022.<sup>3</sup> Within these states, we interviewed

<sup>&</sup>lt;sup>3</sup>Education's monitoring findings in Nebraska and Tennessee resulted in required corrective actions, while those in Nevada resulted in a recommended action. After we completed our interviews in 2023, Education issued reports for Florida and Washington with related findings.

officials from three schools and their associated districts. We selected the schools to reflect a mix of Title I program type, school type, and locale.<sup>4</sup> Although the results of these interviews are not generalizable, they provided perspectives on Title I's parent and family engagement requirements. See appendix I for additional details on our methodology.

We conducted this performance audit from July 2022 to November 2023 in accordance with generally accepted government auditing standards. Those standards require that we plan and perform the audit to obtain sufficient, appropriate evidence to provide a reasonable basis for our findings and conclusions based on our audit objectives. We believe that the evidence obtained provides a reasonable basis for our findings and conclusions based on our audit objectives.

## Background

Title I has separate parent and family engagement requirements for districts and schools and some requirements that apply to both (see tables 1-3). To help states, districts, and schools implement parent and family engagement requirements, Education issued guidance in 2004, after ESEA's prior reauthorization, No Child Left Behind Act of 2001.

#### Table 1: Selected Parent and Family Engagement Requirements Applicable to Title I Districts

| Outreach to<br>parents and<br>family members          | Districts must conduct outreach to all parents and family members and implement programs, activities, and procedures for their involvement. Such efforts must be planned and implemented with meaningful consultation with parents of children participating in Title I programs. |
|---|---|
| District parent<br>and family<br>engagement<br>policy | Districts must develop jointly with parents and family members a written parent and family engagement policy. The policy must explain how the district will involve parents in Title I school activities, such as by establishing a parent advisory board.                        |
| Funding   | Districts may be required to reserve a portion of their Title I allocation for parent and family engagement activities<br>and they must distribute at least 90 percent of these funds to Title I schools, with priority given to high-need<br>schools.                            |

Source: GAO summary of selected requirements of 20 U.S.C. § 6318 | GAO-24-106143

<sup>4</sup>Title I programs are of two types: schoolwide and targeted assistance. A schoolwide program uses Title I funds to improve instruction for all students in order to improve the performance of the lowest-achieving students. A targeted assistance program uses Title I funds to help improve the performance of students who are failing, or most at risk of failing, to meet the State's academic achievement standards. Schools are eligible to a operate school-wide program if at least 40 percent of enrolled children are from low-income families or if the school receives a waiver from the state.

#### Table 2: Selected Parent and Family Engagement Requirements Applicable to Title I Schools<sup>a</sup>

| School-parent compact                               | arent Each school must, jointly with parents, develop a school-parent compact that outlines their shared responsibilities for improved student academic achievement.  |  |
|---|---|--|
| Provide<br>information                              | Each school must provide timely information about Title I programs, as well as a description and explanation about the school's curriculum, the forms of academic assessment used to measure student progress, and the achievement levels of state academic standards.  |  |
| Flexible meetings                                   | Each school must offer a flexible number of meetings, and they may use Title I funds to provide related transportation, child care, or home visits.   |  |
| Annual meeting                                      | Each school must convene an annual meeting, at a convenient time, to explain the school's participation in the Title I program, its requirements, and the right of parents to be involved.  |  |
|   | The policy must describe how the school will carry out the related requirements, some of which are detailed in the sections below.  |  |
| School parent<br>and family<br>engagement<br>policy | Schools must develop a written parent and family engagement policy, jointly with parents and family members.<br>Parents must be notified of the policy in an understandable format, and to the extent practicable, provided in a<br>language the parents can understand. The policy must be made available to the local community and updated<br>periodically to meet the changing needs of parents and the school. |  |

Source: GAO summary of selected requirements of 20 U.S.C. § 6318. | GAO-24-106143

<sup>a</sup>If a district has a district-level parent and family engagement policy that applies to all parent and family members in all schools served by the district, the district can amend that policy, if necessary, to meet these requirements.

#### Table 3: Selected Parent and Family Engagement Requirements Applicable to Title I Districts and Schools

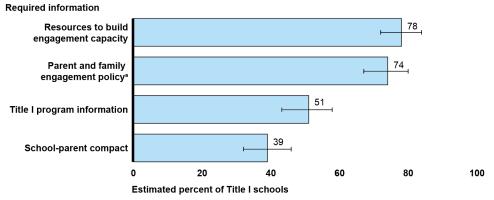
| Building capacity for involvement | Districts and schools must: provide assistance to parents, as appropriate, in understanding such topics as state academic standards, state and local academic assessments and how to monitor a child's progress and work with educators; provide materials and training to help parents work with their children to improve achievement; and educate teachers and other staff, with the assistance of parents, in the value and utility of contributions of parents and in how to communicate with parents as equal partners. |
|-----------------------------------|---|
| Accessibility                     | In carrying out Title I parent and family engagement requirements, districts and schools, to the extent practicable, must provide opportunities for the informed participation of parents and family members, including those who have limited English proficiency, disabilities, and migratory children. This includes providing certain information in a format, and, to the extent practicable, in a language such parents understand.   |

Source: GAO summary of selected requirements of 20 U.S.C. § 6318. | GAO-24-106143

Extent and Type of Parent and Family Engagement Information Available on Title I Schools' Websites Varied Based on our review of a nationally representative sample of Title I schools, we estimated the extent to which Title I schools made certain required parent and family engagement information publicly available on their school or district websites and found that it varied (see fig. 1). While Title I does not require that parent and family engagement policies be shared online, such websites have become important venues for engaging and informing the public, including families of children attending the school. Of the Title I schools that posted their parent and family

engagement policies or school-parent compacts online, about two-thirds had such documents dated within the last 5 years.<sup>5</sup>

Figure 1: Estimated Percent of Title I Schools That Made Certain Required Parent and Family Engagement Information Available on Their School or District Websites



Source: GAO review of a nationally representative sample of Title I schools and their corresponding district websites. | GAO-24-106143

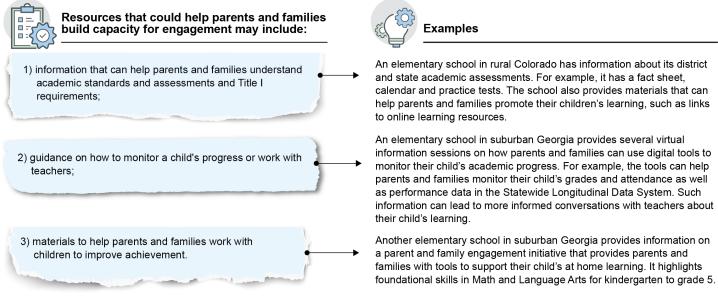
Note: The percentages have a margin of error within plus or minus 7 percentage points at a 95 percent level of confidence. Title I requires, among other things, that parents be notified of the policy in an understandable and uniform format, and the policy must be made available to the local community. It does not explicitly require this information be posted online. However, websites have become important venues for engaging and informing the public, including families of children attending the school.

<sup>a</sup>Findings for parent and family engagement policies include both district and school level policies.

Figure 2 shows several resources schools shared to build their capacity for parent and family engagement and figure 3 presents examples of information schools shared about their Title I programs.

<sup>&</sup>lt;sup>5</sup>These documents were dated 2019 through 2023. The margins of errors at a 95 percent level of confidence were plus or minus 8 percentage points for parent and family engagement policies and plus or minus 12 percentage points for school-parent compacts. The remaining schools had parent and family engagement policies or school-parent compacts that were either older than 5 years or had no date.

#### Figure 2: Examples of Resources Title I<sup>a</sup> Schools Shared on Their Websites to Build Parent and Family Engagement Capacity



Source: Select information from specific district and school websites included in GAO's nationally representative sample of Title I schools; GAO (icons). | GAO-24-106143

<sup>a</sup>Title I refers to Title I, Part A of the Elementary and Secondary Education Act of 1965, as amended, which, among other things, provides funds for parent and family engagement activities.

## Figure 3: Examples of Information Schools Shared on Their Websites about the Title I Program



Title I<sup>a</sup> information could include a program overview and descriptions of program requirements, beneficiaries, funded activities, and program type.

- An elementary school in rural Oklahoma has a webpage devoted to providing Title I information; it describes the program's purpose, type, beneficiaries, as well as the school's eligibility and funded activities. For example, it states that the school operates a schoolwide<sup>b</sup> Title I program that that serves all its students. It also specifies that the Title I program provides tutoring to students who are having academic difficulties.
- An elementary school in suburban Utah has a Title I webpage that provides a description
  of its Title I program, including its goals and services. It also describes the school's Title I
  eligibility, the district's use of Title I funds, and the related rights of parents. For example, it
  states that some Title I funds are used for parent and family engagement initiatives. It also
  cites parents and families' rights to timely information about Title I programs, curriculum
  and assessment information, and the opportunity to be involved in the planning, review,
  and improvement of the parent and family engagement policy.

Source: Select information from specific district and school websites included in GAO's nationally representative sample of Title I schools; GAO (icons). | GAO-24-106143

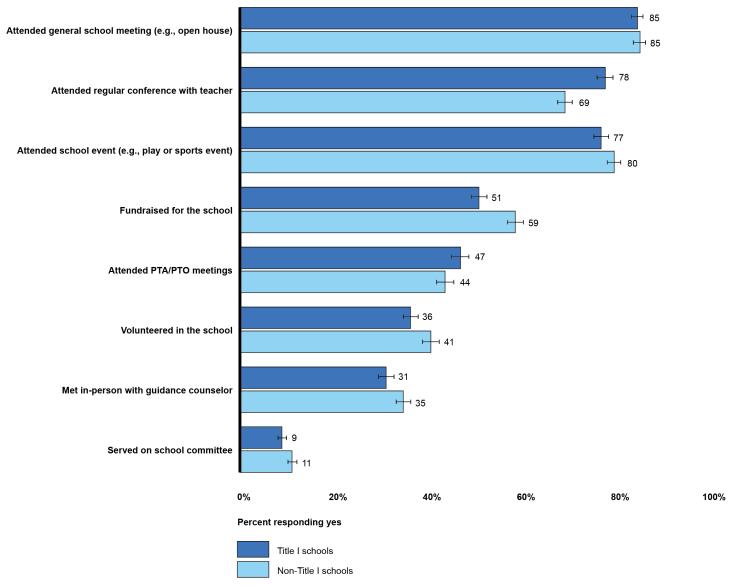
<sup>a</sup>Title I refers to Title I, Part A of the Elementary and Secondary Education Act of 1965, as amended, which, among other things, provides funds for parent and family engagement activities.

<sup>b</sup>Schools are eligible to operate a school-wide program if at least 40 percent of enrolled children are from low-income families or if the school receives a waiver from the state.

|   | To help ensure accessibility of parent and family engagement policies<br>and school-parent compacts, districts and schools must provide them in a<br>format and, to the extent practicable, in a language families understand.<br>We estimated that about one-third of the Title I schools that posted their<br>parent and family engagement policies and compacts made those<br>policies available in Spanish. While our estimates cannot be generalized<br>to the community level, we determined that most of the schools in our<br>sample located in communities where more than 5 percent of families<br>primarily spoke Spanish provided Spanish versions of these documents. <sup>6</sup>            |
|---|--|
|   | Title I schools and districts may choose to establish a districtwide parent<br>advisory council to provide advice on all matters related to parent and<br>family engagement. We estimated that 45 percent of Title I schools made<br>information about advisory councils that include parents publicly available<br>online. For example, an elementary school in suburban Pennsylvania<br>posted information about its district-level parent advisory council, which<br>includes school officials and the president of each school's Parent<br>Teacher Organization. The website also notes the council's meeting<br>dates and locations throughout the school year and invites all families to<br>attend. |
| Parent and Family<br>Involvement Is<br>Largely Similar in Title<br>I and Non-Title I<br>Schools | Across a range of school activities, parent involvement in both Title I and<br>non-Title I schools was generally similar, according to our analysis of the<br>2019 Parent and Family Involvement in Education Survey. <sup>7</sup> One<br>exception was that more parents from Title I schools attended regular<br>conferences with teachers, while more parents from non-Title I schools<br>participated in fundraising. Figure 4 shows the extent to which parents<br>said they participated in a variety of school activities.  |

<sup>7</sup>Department of Education, National Household Education Surveys Program, 2019 Parent and Family Involvement in Education Survey.

<sup>&</sup>lt;sup>6</sup>Our analysis of the American Community Survey and Common Core Data identified schools in our sample located in communities where more than 5 percent of families were limited English speaking and primarily spoke Spanish. We found that 18 of the 27 schools located in such communities posted Spanish versions of their engagement policies and 11 of the 11 schools with school-parent compacts posted did so. These results are not generalizable as we did not design our sample to ensure a sufficient number of schools were located in such communities.



#### Figure 4: Parent Participation in School Activities, Title I and Non-Title I Schools, 2019

Source: GAO analysis of the Department of Education's Parent and Family Involvement in Education Survey data. | GAO-24-106143

Note: The percentages have a margin of error within plus or minus 2 percentage points at a 95 percent level of confidence. The differences between Title I and non-Title I data are not statistically significant for the following categories: attended general school meeting, attended school event, and attended PTA/PTO (Parent Teacher Association or Parent Teacher Organization) meeting.

With respect to how often parents participated in school activities, our analysis of the 2019 Parent and Family Involvement in Education Survey found slight differences between Title I and non-Title I schools. Specifically, parents from Title I schools participated in meetings or activities six times, on average, during the school year, whereas parents from non-Title I schools participated seven times.

The types of school communications that parents reported receiving were generally similar between Title I and non-Title I schools, with one exception: more Title I schools make phone calls to parents about an individual student. Figure 5 shows the extent to which parents said they were receiving these communications.

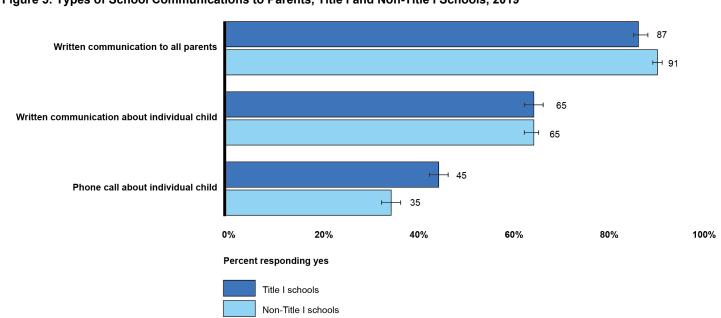


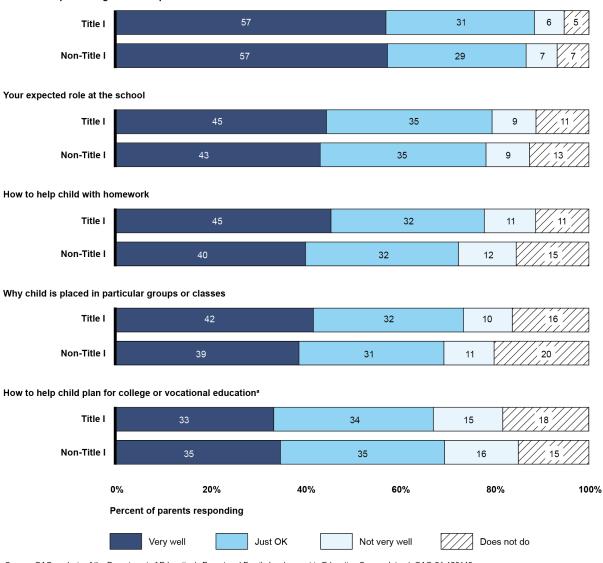
Figure 5: Types of School Communications to Parents, Title I and Non-Title I Schools, 2019

Source: GAO analysis of the Department of Education's Parent and Family Involvement in Education Survey data. | GAO-24-106143

Note: The percentages have a margin of error within plus or minus 2 percentage points at a 95 percent level of confidence. The differences between Title I and non-Title I data are not statistically significant for written communication about an individual child.

Parents from Title I and non-Title I schools generally reported similar levels of satisfaction with schools' efforts to communicate with them (see figure 6.) However, parents from Title I schools were more satisfied with information on how to help children with homework, while parents in non-Title I schools were more satisfied with information on how to help their child prepare for college or vocational education.

#### Figure 6: Parent Perceptions of How Well Schools Communicate Certain Information, Title I and Non-Title I Schools, 2019



How child is performing between report cards

Source: GAO analysis of the Department of Education's Parent and Family Involvement in Education Survey data. | GAO-24-106143

Note: The percentages have a margin of error of plus or minus 2 percentage points at a 95 percent level of confidence. The differences between Title I and non-Title I data for most categories are not statistically significant. These differences are statistically significant for "very well" and "does not do" responses in the following categories: how to help a child with homework and how to help child plan for college or vocational education.

<sup>a</sup>For the category how to help child plan for college or vocational education, the analysis excludes respondents who reported that the question did not apply to them (e.g., this could exclude parents of elementary school students).

Education Monitored States' Compliance with Title I Parent and Family Engagement Requirements, but Its Related Guidance Is Outdated Since 2019, when Education began monitoring states' implementation of ESEA's reauthorization of Title I parent and family engagement requirements, Education has completed nine state performance reviews.<sup>8</sup> As shown in table 4, Education had findings related to parent and family engagement requirements in five of the nine states it reviewed.

 Table 4: Parent and Family Engagement Findings from Education's Title I Monitoring, 2019 through July 2023

| State<br>(fiscal year)   | Findings  | Corrective actions or recommendations  |
|--|---|--|
| Florida (2023)<br>https://oese.ed.gov/files/2023/04/FDOE-2<br>023-Performance-Report.pdf | The Elementary and Secondary Education<br>Act of 1965, as amended (ESEA) <sup>a</sup> section<br>1116(a)(2) and (b) outline the requirements<br>for district and school-level parent and family<br>engagement policies, respectively. While<br>Florida provided a brief overview of some<br>Title I parent and family engagement<br>requirements, it did not describe how districts<br>and schools could meet the requirements of<br>ESEA section 1116(a)(2) and (b).<br>ESEA section 1116(f) requires that districts<br>and schools, to the extent practicable, provide<br>opportunities for the informed participation of<br>parents and families (including those who<br>have limited English proficiency, disabilities,<br>and migratory children). Florida indicated it<br>meets this requirement by permitting districts<br>to purchase up to two pieces of equipment for<br>translation, but it did not provide information<br>on how it monitors district and school<br>implementation. | Education required Florida to provide<br>evidence of guidance and templates for<br>both district and school-level parent and<br>family engagement policies. Both must<br>outline and clearly indicate that districts<br>and schools must describe how they will<br>meet the requirements for parent and<br>family engagement policies (ESEA section<br>1116(a)(2) and (b)), respectively.<br>Education required Florida to update its<br>monitoring procedures or processes to<br>verify the state monitors each district to<br>ensure it is meeting parent and family<br>engagement requirements under ESEA<br>section 1116(f). |

<sup>&</sup>lt;sup>8</sup>Education's fiscal year monitoring included: New Jersey and Montana (2019); Kentucky (2020); Nevada and Tennessee (2021); Nebraska and Ohio (2022); and Florida and Washington (2023). In July 2023, Education officials said fiscal year 2023 monitoring is underway or planned for Maine and New Mexico.

| State<br>(fiscal year)  | Findings  | Corrective actions or<br>recommendations   |
|---|---|--|
| Washington (2023)<br>https://oese.ed.gov/files/2023/07/FY2023-<br>Washington-Report-07-27-23.pdf              | Under ESEA section 1116(h), the state is<br>required to review the district's parent and<br>family engagement policies and practices to<br>determine if they meet requirements. Up until<br>2019, Washington reviewed districts' polices,<br>as part of its monitoring process, but then it<br>began to only provide guidance and a rubric<br>to help districts develop and evaluate the<br>policies.<br>ESEA 1116(a)(3)(C) requires that not less<br>than 90 percent of the funds the district<br>reserved for parent and family engagement<br>shall be distributed to Title I schools, with<br>priority given to high-need schools. While<br>Washington's Title I guidance describes this<br>requirement, its monitoring process did not<br>include it. | Education required Washington to provide<br>evidence of updated guidance and<br>resources on district parent and family<br>engagement policies to clearly indicate<br>that each district must describe how it will<br>meet the requirements under ESEA<br>section 1116(a)(2) rather than simply<br>reiterating them. Education also required<br>monitoring protocols or other procedures<br>to ensure that the state reviews districts'<br>policies to determine if they meet<br>requirements.<br>Education required that Washington's<br>monitoring protocols or other procedures<br>ensure that each district distributes not<br>less than 90 percent of the funds reserved<br>for parent and family engagement to Title I<br>schools, with priority given to high-need<br>schools, as required by ESEA section<br>1116(a)(3). |
| Nebraska (2022)<br>https://oese.ed.gov/files/2022/08/FY-2022-<br>Nebraska-Report-Final-07-21-22.pdf           | ESEA section 1116(a)(2) and (b) outline the<br>requirements for district and school-level<br>parent and family engagement policies,<br>respectively. While Nebraska provided<br>guidance and templates that outline these<br>requirements, the current versions did not<br>specify that districts and schools had to<br>describe how they would meet those<br>requirements.<br>ESEA section 1116(a)(3)(C) requires that not<br>less than 90 percent of the funds reserved for<br>parent and family engagement shall be<br>distributed to Title I schools, with priority<br>given to high-need schools. Nebraska did not<br>ensure that each district prioritized high-need<br>schools when distributing parent and family<br>engagement funds.            | Education required Nebraska to update its<br>guidance and templates to clarify that its<br>districts and schools needed to describe<br>how they would meet parent and family<br>engagement requirements under ESEA<br>section 1116(a)(2) and (b).<br>Education required that Nebraska update<br>its policies to ensure that each district<br>prioritize funding for high-need schools, as<br>required under ESEA section<br>1116(a)(3)(C).   |
| Tennessee (2021)<br>https://oese.ed.gov/files/2021/11/TDOE-P<br>erformance-Monitoring-Review-Report-2.p<br>df | ESEA section 1116(f) requires that districts<br>provide opportunities for the informed<br>participation of parents and families in Title I<br>parent and family engagement activities<br>(including those who have limited English<br>proficiency, disabilities, and migratory<br>children), such as providing information and<br>school reports in a language such parents<br>understand.<br>Tennessee did not provide evidence that it<br>ensured its districts were providing<br>engagement opportunities for families of<br>children with disabilities or families of children<br>who were migrants, as required.   | Education required Tennessee to detail<br>how it would ensure that Title I districts<br>were reducing barriers and providing<br>opportunities for all parents and families to<br>participate in Title I parent and family<br>engagement activities, including those<br>with disabilities and migratory children, as<br>required under ESEA section 1116(f).  |

| State<br>(fiscal year)  | Findings  | Corrective actions or<br>recommendations  |
|---|---|---|
| Nevada (2021)   | Nevada's monitoring system did not appear to  | Education recommended Nevada revise   |
| https://oese.ed.gov/files/2021/08/Nevada-<br>Performance-Report-Final-8-11-2021.pdf | review for the requirement under ESEA<br>section 1116(f) that districts and schools, to<br>the extent practicable, provide opportunities<br>for the informed participation of parents and<br>family members (including those with limited<br>English proficiency, disabilities, and migratory<br>children), when carrying out parent and family<br>engagement requirements. | its monitoring protocols and guidance to<br>ensure districts clearly describe how they<br>create opportunities for the informed<br>participation of all parents and family<br>members, as required under ESEA<br>section 1116(f). |

Source: GAO review of the Department of Education's performance review reports for Florida, Nebraska, Nevada, Tennessee, and Washington https://oese.ed.gov/offices/office-of-formula-grants/school-support-and-accountability/performance-review/ I GAO-24-106143

Note: Education's state monitoring in fiscal years 2019 and 2020 did not yield findings regarding parent and family engagement. According to Education officials, Nebraska and Tennessee undertook efforts to remedy their deficiencies and Florida and Washington have begun to do so. They also said recommendations, such as in Nevada's case, do not warrant follow-up because they do not represent areas of non-compliance.

<sup>a</sup>ESEA is codified at 20 U.S.C. §§ 6301 –8961) | GAO-24-106143

Education selects states to monitor based upon a risk assessment (see fig. 7). The monitoring process includes gathering information about the state's Title I programs based on a set of questions Education asks of the states and a review of documents related to the state's program (see fig. 8). As part of the monitoring process, Education also selects some districts for review to better understand the state's implementation of Title I and the support and oversight it provides its districts. The results of Education's reviews are publicly available and include any corrective actions states must take or recommendations states may consider. States must provide Education with information on their corrective actions. When Education determines the state has resolved all of its findings, it issues a letter to close out the monitoring report.

| State selection  | Monitoring process   | Results of review  |
|--|--|--|
| • Education selects states for<br>monitoring based on an assessment<br>that considers administrative,<br>financial, and internal control risk. | <ul> <li>The selected states complete self-assessment question-<br/>naires about how the state supports and oversees<br/>implementation of several federal education programs,<br/>including Title I and its parent and family engagement<br/>requirements.</li> <li>Education reviews the completed questionnaires and<br/>accompanying documentation to inform its subsequent<br/>interviews with state officials.</li> <li>Within each state, Education follows a similar process<br/>with selected school districts to better understand how<br/>the selected states oversee districts.</li> </ul> | • Using the information collected,<br>Education assesses whether the<br>selected states are fulfilling their<br>responsibilities and issues a<br>performance report with the results.<br>If there are findings, the report will<br>specify recommendations or<br>corrective actions for the state. |

#### Figure 7: Education's Consolidated Monitoring Process

Source: GAO review of the Department of Education's consolidated monitoring process documents; GAO (icons). | GAO-24-106143

| Key questions from the state self-assessment questionnaire  | Documentation suggested  |
|---|--|
| <ul> <li>What guidance does the state provide to districts regarding requirements<br/>for district parent and family engagement policies, school parent and<br/>family engagement policies, and school-parent compacts?</li> </ul>  | Guidance regarding parent and family requirements  |
| • How does the state review the district parent and family engagement policies to ensure they meet requirements of section 1116(a)(2) and that intended uses of funds are allowable?  | <ul> <li>Copy of the process to review district parent and family<br/>engagement policies</li> <li>State template for district parent and family engagement<br/>policies, if applicable</li> <li>Samples of feedback to districts regarding the state's<br/>review of their parent and family engagement policies</li> </ul> |
| • In the review of the district's parent and family engagement policies and practices, how does the state ensure that the district's parent and family engagement policies provide opportunities for the participation of all parents and family members (including those who have limited English proficiency, disabilities, and migratory children) and provides information and school reports, in a format, and, to the extent practicable, in a language that parents understand?  | <ul> <li>Copy of the process to review district policies and<br/>procedures for parent and family engagement</li> </ul>  |
| <ul> <li>How does the state ensure that each district reserves at least 1 percent of its allocation under Title I to assist schools to carry out parent and family engagement activities, unless such reservation for the fiscal year for which the determination is made would be \$5,000 or less?</li> <li>How does the state ensure that each district that reserves at least 1 percent of its Title I allocation distributes not less than 90 percent of those reserved funds to Title I schools with priority given to high-need schools?</li> </ul> | <ul> <li>Guidance to districts regarding reservations for parent<br/>and family engagement and/or evidence of reservation in<br/>district applications and process for approval.</li> <li>Evidence of monitoring districts related to reservations<br/>for parent and family engagement</li> </ul>                           |
| <ul> <li>How does the state ensure that funds reserved under Title I, Part A by a<br/>district for parent and family engagement are used to carry out activities and<br/>strategies consistent with the district's parent and family engagement policy<br/>and allowable uses of funds?</li> </ul>  | <ul><li>A budget review checklist</li><li>State monitoring protocols</li></ul>   |

#### Figure 8: Selections from Education's Monitoring Protocol about Title I Parent and Family Engagement Requirements

Source: GAO review of the Department of Education's State Education Agency Title I Performance Review, Self-Assessment and On-site/Desk Review Protocol, https://oese.ed.gov/files/2022/10/parentinvguid.pdf. | GAO-24-106143

> Education's guidance on Title I Parental Involvement is meant to help states, districts, and Title I schools implement requirements related to parent and family engagement in the Elementary and Secondary Education Act of 1965, as amended (ESEA). This parent and family engagement guidance, which is currently in effect, was written in 2004 for the requirements of the No Child Left Behind Act of 2001, the prior reauthorization of ESEA.

Some provisions related to parent and family engagement changed in ESEA's current authorization and the current guidance contains outdated references to law or terminology (see table 5). For example, the 2004 guidance does not mention the current law's requirement that districts prioritize high-need schools when distributing funds. In its 2022 review of Nebraska, Education cited the state for not ensuring that each district prioritized high-need schools when distributing parent and family engagement funds, as required in current law.

#### Table 5: Selection of Outdated Information in Education's Title I Guidance on Parent and Family Engagement Requirements

| Outdated information  | Content from current federal law   |
|---|--|
| The first page of the guidance includes the logo for the No Child Left<br>Behind Act of 2001—the name of ESEA's previous reauthorization. The<br>No Child Left Behind Act of 2001 is referenced several times<br>throughout the document, but, in 2015, it was superseded by ESEA, as<br>amended by the Every Student Succeeds Act. | ESEA's current reauthorization is called the Every Student Succeeds Act.   |
| The guidance is entitled Parental Involvement: Title I, Part A.   | Current law replaced the term "parental involvement" with<br>"parent and family engagement."   |
| Page 28 states that "The law is clear that 95 percent of the one percent<br>of Title I, Part A allocation the district reserves for parental involvement<br>under section 1118 must be distributed among the district's schools"<br>Several other pages note the 95 percent requirement.  | Current law requires that "not less than 90 percent of the<br>funds reserved" must be distributed to Title I schools for<br>parent and family engagement activities. |
| The guidance does not mention prioritizing "high-need" schools when distributing Title I funds.   | Current law requires that districts prioritize "high-need" schools when distributing funds.  |

Source: GAO review of the Department of Education's Non-Regulatory Guidance on Parental Involvement: Title I, Part A and Title I, Part A of the Elementary and Secondary Education Act of 1965, as amended (ESEA), Section 1116. | GAO-24-106143

State officials we interviewed in the three states where Education had monitoring findings related to parent and family engagement from fiscal years 2019–2022 were critical of Education's related Title I guidance.<sup>9</sup> They said that its outdated references to the previous version of the law confuse users and that some may believe the guidance is not in effect because of this. All three states' officials said the guidance needs to be updated to reflect the current law. Education officials acknowledged the guidance's discrepancies with current law, but said they have no plans to update it. Education officials told us that most requirements specified in the guidance are salient to current law. However, without updated guidance, states may not fully comply with key requirements, as happened in Nebraska, which Education cited for not ensuring that districts prioritized funding to high-need schools.

<sup>&</sup>lt;sup>9</sup>These states were Nebraska, Nevada, and Tennessee.

| Conclusions                         | Issuing guidance to help ensure that states, districts, and schools have a clear understanding of Title I's requirements, including parent and family engagement requirements, is critical for their proper implementation and part of Education's oversight role. However, Education's decades-old guidance does not accurately reflect aspects of the law that changed in the 2015 reauthorization. As such, state and local officials cannot fully rely on it to correctly guide them in implementing Title I requirements. Absent updating its Title I guidance to fully and accurately reflect the requirements of the current authorization of ESEA, states may inadvertently provide erroneous or incomplete instruction to their districts and schools. This could result in high-need schools missing out on resources that could help them engage families more fully with their children's education. |
|-------------------------------------|--|
| Recommendation for Executive Action | The Secretary of Education should update its Title I guidance on parent<br>and family engagement to reflect requirements under current law.<br>(Recommendation 1)  |
| Agency Comments                     | We provided a draft of this report to Education for review and comment.<br>Education provided written technical comments, which we incorporated<br>as appropriate. In its formal comments, which are reproduced in appendix<br>II, Education agreed with the recommendation and described plans to<br>implement it.  |

As agreed with your office, unless you publicly announce its contents earlier, we plan no further distribution of this report until 30 days from its issue date. At that time, we will send copies of this report to the appropriate congressional committees, the Secretary of Education, and other interested parties. In addition, the report is available at no charge on the GAO website at https://www.gao.gov.

If you or your staff have any questions about this report, please contact me at (202) 512-7215 or nowickij@gao.gov. Contact points for our Offices of Congressional Relations and Public Affairs may be found on the last page of this report. GAO staff who made key contributions to this report are listed in appendix III.

Sincerely yours,

rem. nomeli

Jacqueline M. Nowicki, Director Education, Workforce, and Income Security Issues

# Appendix I: Objectives, Scope, and Methodology

|  | This report examines (1) the extent to which Title I schools made required parent and family engagement information available on their websites, (2) how parent and family engagement compares between Title I and non-Title I schools, and (3) the extent to which Education's state monitoring and guidance addresses Title I requirements for parent and family engagement.  |
|--|---|
| Representative<br>Website Review of<br>Title I Schools | To determine the extent to which Title I schools made required parent and family engagement information available on their websites, we reviewed a nationally representative random sample of Title I schools and determined the extent to which they posted selected information on their school or district websites. <sup>1</sup> We drew our sample of schools using Education's Common Core of Data, which contains varied information about K-12 public schools. <sup>2</sup> Using school year 2020–21 data, we identified the universe of schools with Title I programs for all states except California, Illinois, and Utah. These states did not report Title I status of their schools in school year 2020-21 data and so we used school year 2019–20 data to draw a separate supplemental sample for these states. From our initial sampling frames, we identified a generalizable stratified random sample of 193 schools (160 based on school year 2020–21). Our sampling frame included all open, non-Department of Defense K-12 schools with enrollment greater than zero in the 50 states, Washington DC, and the territories. For both the original and supplemental sample, we implemented the stratification to ensure proportional representation across the strata; we did not generate estimates to report on them specifically. When school year 2021–22 data became available mid-way through the course of our audit work, we cross checked our sample of schools to ensure they still had active Title I programs. As a result, 13 of the 193 schools in our combined sample were removed from the sample: two schools had closed and 11 schools no longer had Title I programs. |
|  |   |

<sup>&</sup>lt;sup>1</sup>Title I requires that parents be notified of the policy in an understandable and uniform format, and the policy must be made available to the local community. While it does not require that such information be posted online, websites have become important venues for engaging and informing the public, including families of children attending school.

<sup>&</sup>lt;sup>2</sup>The Common Core of Data is the Department of Education's primary database on public elementary and secondary education in the United States. It is a comprehensive, annual, national database of all public elementary and secondary schools and school districts.

|  | To collect comparable information across the sampled schools, we developed a standardized data collection instrument and pre-tested it in November and December of 2022. Using the finalized data collection instrument, we examined the school and associated district websites for select information required by Title I parent and family engagement requirements. For example, we sought district and school-level parent and family engagement policies, school-parent compacts, and resources for building families' capacity to engage. For the policies and compacts, we captured information on their dates and available languages. All information entered into the data collection instrument was independently cross-checked to ensure its reliability. We conducted our review from November 2022 through May 2023.  |
|--|---|
|  | This sample of schools allowed us to make national estimates about the availability of selected family engagement information on school and district websites. The percentage estimates from this entire review have margins of error at the 95 percent confidence level ranging from 6 to 12 percentage points and are more specifically noted in the report.  |
|  | To determine the extent to which Title I schools in our sample were<br>making select documents accessible to families in languages spoken<br>within the local community, we analyzed data from the U.S. Census<br>Bureau's American Community Survey. We assessed the reliability of this<br>data source by reviewing related documentation and determined the data<br>were sufficiently reliable for our purposes. Using the zip codes of the<br>schools in our sample, we identified which schools were located in<br>communities where 5 percent or more of families had limited English<br>language proficiency skills and also primarily spoke Spanish. We then<br>looked to see whether those schools made their school or district-level<br>parent and family engagement policies and school-parent compacts<br>available in Spanish on their websites. The results of this analysis are not<br>representative, but do provide insight into the practices of our sampled<br>schools. |
| Analysis of Survey<br>Data on Family<br>Engagement | To compare families' engagement in Title I and non-Title I schools, we<br>analyzed the differences in responses from Title I and non-Title I schools<br>from Education's Parent and Family Involvement in Education Survey for<br>school year 2018–19 (most recent). This survey collects information from<br>parents on their experiences with schools including various aspects of<br>family engagement. We analyzed responses from a series of questions<br>on the extent to which parents participated in various school activities and<br>the types of communication they received from the school. These<br>questions capture such things as the frequency of families attending  |

|   | school meetings and parent/teacher conferences, communications<br>received from teachers and administrators about their child's status, and<br>families' satisfaction with various aspects of the school, including<br>communications. These survey data reflect the percentage of students<br>whose parents reported specific responses.   |
|---|---|
|   | Because this survey does not identify schools' Title I status, we used a Title I identifying variable in the Common Core of Data to determine which survey responses were from Title I schools and which were not. The estimates derived from this analysis and presented in the report have their margin of errors noted at a 95 percent level of confidence. We assessed the reliability of these data by reviewing related documentation, such as the survey instruments and user manuals. We determined the data were sufficiently reliable for our purposes.   |
| Review of Education's<br>Monitoring and<br>Guidance on Title I<br>Family Engagement | To determine the extent to which Education's monitoring and guidance<br>addresses Title I requirements for parent and family engagement, we<br>reviewed documents that describe the extent to which Education monitors<br>state oversight of parent and family engagement requirements, including<br>state and district-level Title I performance review protocols. We also<br>reviewed the nine resulting performance reports issued between 2019<br>and July of 2023. To understand the extent to which Education's<br>guidance addresses parent and family engagement requirements, we<br>reviewed relevant federal laws and Education's guidance on Title I parent<br>and family engagement requirements. |
| Interviews with State<br>and Local Education<br>Officials                           | To deepen our understanding of parent and family engagement issues, we interviewed officials from Education as well as state and local education officials in Nebraska, Nevada, and Tennessee—the three states with parent and family engagement findings identified by Education from fiscal years 2019 to 2022. <sup>3</sup> In each state, we conducted semi-structured interviews with state officials responsible for supporting and implementing Title I parent and family engagement requirements. We also conducted semi-structured interviews with officials from three schools and their associated districts. We selected these schools to   |

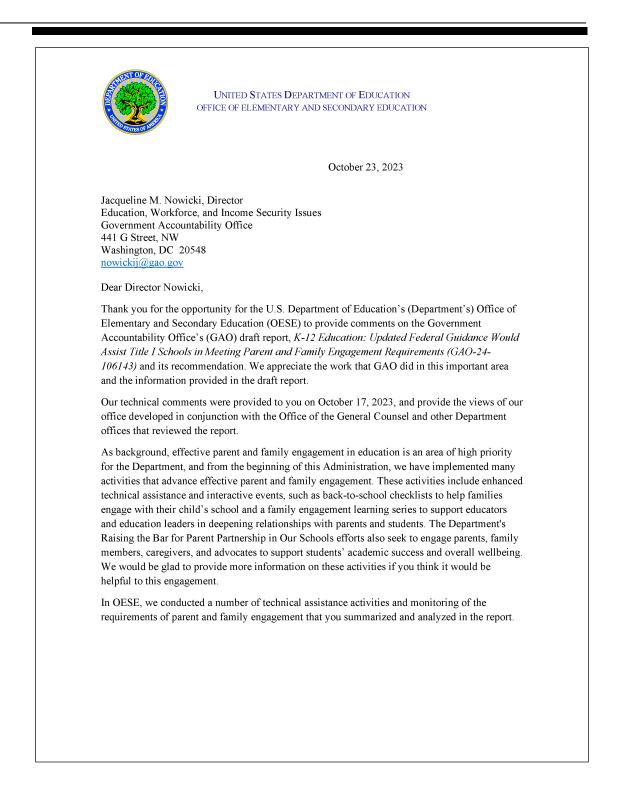
<sup>3</sup>Education's monitoring findings in Nebraska and Tennessee resulted in required corrective actions, while those in Nevada resulted in a suggested recommendation.

reflect a mix of Title I program type, school type, and locale.<sup>4</sup> Although the results of these interviews are not generalizable, they provided varied perspectives on Title I required efforts on engaging families.

We conducted this performance audit from July 2022 to November 2023 in accordance with generally accepted government auditing standards. Those standards require that we plan and perform the audit to obtain sufficient, appropriate evidence to provide a reasonable basis for our findings and conclusions based on our audit objectives. We believe that the evidence obtained provides a reasonable basis for our findings and conclusions based on our audit objectives.

<sup>&</sup>lt;sup>4</sup>Title I programs are of two types: school-wide and targeted assistance. A school-wide program uses Title I funds to improve instruction for all students in order to improve the performance of the lowest-achieving students. A targeted assistance program uses Title I funds to help improve the performance of students who are failing, or most at risk of failing, to meet the State's academic achievement standards. Schools are eligible to operate a school-wide program if at least 40 percent of enrolled children are from low-income families or if the school receives a waiver from the state.

# Appendix II: Comments from the Department of Education



ED appreciates and agrees with GAO's recommendation, and we will be taking expeditious steps to update the guidance and consider other steps including further technical assistance to help ensure that all requirements with regard to parent and family engagement are met and fully understood. Please let us know if you have questions or need more information. Thank you for your consideration of the Department's input. Sincerely, MARK WASHINGTON Date: 2023 10 23 20:14:37 -04'00' Mark Washington Deputy Assistant Secretary Office of Elementary and Secondary Education

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# Appendix III: GAO Contact and Staff Acknowledgments

| GAO Contact              | Jacqueline M. Nowicki, (202) 512-7215 or Nowickij@gao.gov  |
|--------------------------|--|
| Staff<br>Acknowledgments | In addition to the contacts named above, Sherri Doughty (Assistant<br>Director), Kathryn O'Dea Lamas (Analyst in Charge), and Joel Marus<br>made key contributions to this report. Additional assistance was provided<br>by James Ashley, Madeline Barch, Elizabeth Calderon, Holly Dye, Serena<br>Lo, John Mingus, Jason Palmer, Claudine Pauselli, Almeta Spencer,<br>Barbara Steel, Curtia Taylor, and Adam Wendel. |

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