



## UNITED STATES DEPARTMENT OF EDUCATION

OFFICE OF ELEMENTARY AND SECONDARY EDUCATION

December 17, 2025

The Honorable Randy Watson  
Commissioner of Education  
Kansas State Department of Education  
900 SW Jackson Street  
Topeka, KS 66612

Dear Commissioner Watson:

Between May 29 and August 22, 2025, the U.S. Department of Education's (Department's) Office of School Support and Accountability (SSA) reviewed the Kansas State Department of Education's (KSDE's) compliance with parent and family engagement requirements in Title I, Part A (Title I) of the Elementary and Secondary Education Act of 1965 (ESEA). The Department conducted this targeted monitoring to provide oversight of and technical assistance to State educational agencies (SEAs) as part of the Department's efforts to advance the purpose of Title I to provide all children significant opportunity to receive a fair, equitable, and high-quality education. This targeted monitoring focused on the SEA's compliance with parent and family engagement requirements including those under ESEA sections 1111(g)(2)(F), 1112(e), and 1116, including SEA processes for ensuring that local educational agencies (LEAs) reserve Title I funds for parent and family engagement, develop and implement LEA and school parent and family engagement policies, meet requirements under parents' right-to-know, and provide technical assistance related to implementation of these requirements.

After providing a completed self-assessment and supporting documentation, KSDE and the Department conducted a conversation to discuss the information provided in the self-assessment. The Department also selected one LEA to participate in a conversation with the Department to discuss its implementation of the Title I parent and family engagement requirements.

Enclosed is information on the Department's specific commendations, recommendations, and required actions regarding KSDE's implementation of the parent and family engagement requirements. "Recommendation" indicates an area where the SEA is meeting the requirements but where it may consider improvements to its current procedures. "Required Action" indicates an issue where there are compliance or quality concerns that require attention by the SEA in order to meet statutory requirements and will be revisited until the State has remedied the issue.

KSDE has sixty (60) business days from receipt of this letter to respond, in the manner described in the appendix, to each required action. KSDE must send a response and supporting documentation to the Department at [OESE.TitleI-a@ed.gov](mailto:OESE.TitleI-a@ed.gov). The Department will review KSDE's response to determine if the required action has been addressed sufficiently and request additional information, as needed.

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*The Department of Education's mission is to promote student achievement and preparation for global competitiveness by fostering educational excellence and ensuring equal access.*

The Department would like to thank KSDE for its time and effort during this targeted monitoring process. Following this review, the Department will look across all targeted monitoring results to inform technical assistance, including highlighting recommended practices and sharing the results of this review with SEAs. The Department looks forward to continuing to work with KSDE to address the needs of students and families in Kansas. If KSDE has any questions or concerns, please contact the Department at: [OESE.Title-I-a@ed.gov](mailto:OESE.Title-I-a@ed.gov).

Sincerely,

Patrick Rooney  
Director, School Support & Accountability

Enclosure

cc: Joe Jewett, Kansas State Department of Education  
Bert Moore, Kansas State Department of Education  
Twyla Sprouse, Kansas State Department of Education  
Dean Zajic, Kansas State Department of Education

**Targeted Monitoring  
Parent and Family Engagement Requirements  
Under Title I, Part A of the ESEA  
Monitoring Results for Kansas**

**PARENT AND FAMILY  
ENGAGEMENT**

**REQUIREMENT DESCRIPTION**

Description: An LEA that receives Title I funds must notify parents that they may request information on teacher and paraprofessional qualifications. Additionally, an LEA must provide parents with information regarding student academic achievement and growth, testing transparency, information regarding the State or LEA policy for student participation in any assessments and additional information. An LEA receiving Title I funds must also conduct outreach to parents and family members and implement parent and family programs and activities, which must be planned and implemented in consultation with parents. An SEA must collect and disseminate to LEAs effective parent and family engagement strategies.

ESEA §§ 1111(g)(2)(F), 1112(e), 1116, 8101(39)

**Summary**

**Parent and Family Engagement Reservation**

Section 1116(a)(3)(A) of the Elementary and Secondary Education Act of 1965 (ESEA) requires a local educational agency (LEA) that receives a Title I, Part A (Title I) allocation of greater than \$500,000 to reserve at least one percent of its Title I allocation to carry out the parent and family engagement requirements in ESEA section 1116. It also requires an LEA to distribute at least 90 percent of this reservation to its Title I schools while giving priority to high-need schools. The Kansas State Department of Education (KSDE) provided documentation of guidance distributed through a variety of means (e.g., website, presentations) to LEAs regarding the reservation and distribution requirements. KSDE also provided documentation that its consolidated local application for ESEA programs automatically calculates the minimum amount of funds the LEA must reserve and the amount the LEA must distribute to schools. The guidance for the 2024-2025 school year local consolidated application provides instructions to LEAs to distribute the required 90 percent and automated business rules flag any distribution that is less than expected. During the desk review, KSDE indicated that most LEAs use the percentage of low-income students served by a school to distribute funds to all Title I schools. However, an LEA may choose to distribute parent and family engagement funds manually to select Title I schools. During the desk review, KSDE confirmed that its processes currently do not check to ensure an LEA gives priority to high-need schools when the LEA manually distributes parent and family engagement reservation funds to Title I schools.

ESEA section 1116(a)(3)(D) requires that the use of funds maintained at the LEA level must be consistent with the LEA parent and family engagement policy and include at least one strategy listed in section 1116(a)(3)(D)(i)-(v). KSDE's documentation includes guidance (e.g., Program Director handbook) that each LEA must submit an expense report to KSDE that aligns with its approved local consolidated application at the end of each fiscal year. KSDE's documentation further demonstrated that each LEA must indicate its planned use of parent and family engagement funds in the consolidated local application, including at least one activity under ESEA section 1116(a)(3)(D). KSDE provided documentation showing it monitors the use of funds reserved by the LEA for parent and family

engagement through an annual self-assessment and data verification process. The self-assessment monitoring protocol asks if the LEA has documentation to demonstrate that Title I funds were expended appropriately in the amounts generated by each building in its approved local consolidated application. The LEA must submit requested documentation if the question is selected for data verification, which includes expenditure audit reports and building budgets. During the desk review, KSDE indicated that it monitored LEAs that self-reported noncompliance in the 2024-2025 school year. KSDE described collecting expenditures from the LEAs and comparing the expenses to the budgets submitted in the LEA's local consolidated application. However, while KSDE submitted additional documentation showing a school budget from the local consolidated application and related expense report, KSDE did not provide evidence of how it monitors, using these documents or otherwise, to ensure each LEA serving Title I schools carries out activities and strategies consistent with the LEA's parent and family engagement policy and allowable uses of funds, including at least one of the uses specified in ESEA section 1116(a)(3)(D). Additionally, during the desk review, KSDE clarified that it does not ensure that an LEA monitors the use of parent and family engagement funds by its schools.

#### LEA Parent and Family Engagement Policies

ESEA section 1116(a)(2) requires each LEA that receives Title I funds to develop a written parent and family engagement policy that establishes the LEA's expectations and objectives for meaningful parent and family engagement. The policy must be developed jointly, and agreed upon, with the parents and family members of children participating in Title I programs, distributed to parents and family members of all children participating in Title I programs, and annually evaluated. KSDE provided documentation that it provides clear guidance to LEAs on these requirements, including a recommended annual timeline to receive feedback from parents and families, review data, and create or update the policy.

KSDE further provided documentation that the annual LEA self-assessment requires LEAs to have documentation to illustrate that each Title I school has developed, jointly with parents of children participating in Title I services, a written school parental involvement policy that describes how the school will carry out the parental involvement requirements in ESEA section 1118(c)-(f), including the development of a school-parent compact. The LEA must submit documentation if the question is selected for data verification, which includes the "Parental Involvement Policy developed jointly with parents that includes the National Parent Teacher Association (PTA) Standards." During the desk review, KSDE confirmed it limits monitoring to school-level policies and parent compacts. KSDE further confirmed that it does not currently monitor to ensure each LEA develops and distributes parent and family engagement policies consistent with requirements.

ESEA section 1116(a)(2) requires that an LEA incorporate its parent and family engagement policy into its local application for Title I funds. However, LEAs in Kansas submit a consolidated local application for ESEA programs consistent with ESEA section 8305. As a result, if KSDE decides that the parent and family engagement policy is not "absolutely necessary" for the consideration of the consolidated local application, the LEA may choose any location for its parent and family engagement policy as long as the policy meets all requirements. Regardless of location, KSDE must still ensure LEAs meet each requirement in ESEA section 1116(a)(2).

ESEA section 1116(a)(3)(B) requires an LEA that reserves funds for parent and family engagement to involve parents and families of students participating in Title I programs in decisions about how the LEA uses the reserved funds. The involvement of parents and families should be in a manner consistent

with the definition of parental involvement in ESEA section 8101(39).<sup>1</sup> KSDE provided documentation of guidance to LEAs regarding parent and family involvement in the uses of parent and family engagement funds. In its narrative response, KSDE indicated that its State law requires each LEA to have a site council that must include parents of pupils attending the school, and the LEA confirmed this requirement. The site council provides advice on the use of funds in the LEA overall and other matters relating to Title I programs. KSDE provided documentation that an LEA, if selected for data verification during annual monitoring, must submit evidence (e.g., notification letter, feedback survey) that the LEA has documentation to show that parents are actively involved in an annual evaluation of the Title I program and the use of funds for parent involvement. This question was selected for data verification in the 2024-2025 school year and KSDE reviewed the survey and evaluation results and parent meeting agenda/sign in sheets to check for teacher and parent input on Title I program decisions, including use of funds.

ESEA section 1116(f) requires LEAs and schools, to the extent practicable, to 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), including providing information and school reports required under ESEA section 1111 in a format and, to the extent practicable, in a language such parents understand. KSDE provided documentation that an LEA, if selected for data verification during annual monitoring, must submit documentation that shows communication to parents is expressed in a language parents can understand. KSDE further provided documentation of guidance to LEAs on this requirement, including templates with suggested activities to ensure the inclusion of parents with limited English proficiency. The submitted documentation does not address inclusion of parents and family members with disabilities or parent and family members of migratory students. During the desk review, KSDE confirmed it does not ensure that LEAs meet the requirement in ESEA section 1116(f), to the extent practicable, to provide opportunities for the informed participation of parents and family members with disabilities and parents and family members of migratory children.

#### *School Parent and Family Engagement Policies and Compact*

As described above, ESEA section 1116(b)(1)-(3) requires each Title I school to develop, jointly with parents and families of children participating in Title I services, a written school parent and family engagement policy that describes how the school will carry out the requirements in ESEA section 1116(c)-(f), including the development of a school-parent compact. Schools must update these policies periodically to meet the changing needs of parents and the school. KSDE submitted guidance, a school parent and family engagement policy template, and a corresponding checklist which each include all required elements of ESEA section 1116(c). KSDE provided evidence that each LEA must submit all school-level parent and family engagement policies during monitoring and reviews for select requirements. However, during the desk review, KDSE confirmed it does not ensure LEA oversight of the specific requirements in ESEA section 1116(c)(2)-(5), including how each Title I school parent and family engagement policy address how the school:

- Offers a flexible number of meetings, such as meetings in the morning or evening, and may provide, with funds provided under this part, transportation, childcare, or home visits, as such services relate to parental involvement;

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<sup>1</sup> ESEA section 8101(39) defines “parental involvement” as the participation of parents in regular, two-way, and meaningful communication involving student academic learning and other school activities, including ensuring that parents play an integral role in assisting their child’s learning; that parents are encouraged to be actively involved in their child’s education at school; that parents are full partners in their child’s education and are included, as appropriate, in decision making and on advisory committees to assist in the education of their child.

- Involves parents, in an organized, on-going, and timely way, in the planning, review, and improvement of Title I programs, including the planning, review, and improvement of the school parent and family engagement policy and the joint development of the schoolwide program plan under ESEA section 1114(b), except that if a school has in place a process for involving parents in the joint planning and design of the school's programs, the school may use that process, if such process includes an adequate representation of parents of participating children;
- Provides parents of participating children with timely information about programs under this part; a description and explanation of the curriculum in use at the school, the forms of academic assessment used to measure student progress, and the achievement levels of the challenging State academic standards; and if requested by parents, opportunities for regular meetings to formulate suggestions and to participate, as appropriate, in decisions relating to the education of their children, and respond to any such suggestions as soon as practicably possible; and
- If the schoolwide program plan under ESEA section 1114(b) is not satisfactory to the parents of participating children, submits any parent comments on the plan when the school makes the plan available to the LEA.

ESEA section 1116(b)(1) requires that school parent and family engagement policies are distributed to parents and families in an understandable and uniform format and are updated periodically to meet the changing needs of parents and the school. During the desk review, KSDE shared that when an LEA self-reports noncompliance with the distribution requirement, it requires LEAs to submit screenshots of where an LEA or school publishes the school policies. However, KSDE confirmed that it does not have a systematic process for ensuring that LEAs monitor school implementation of these requirements.

ESEA section 1116(d) requires each Title I school to jointly develop a school-parent compact that outlines how parents, the entire school staff, and students will share the responsibility for improved student academic achievement and how the school and parents will build and develop a partnership to help children achieve the State's high standards. KSDE provided documentation of comprehensive guidance to LEAs and schools regarding the requirements of ESEA section 1116(d). The guidance is accurate, includes all requirements and provides both checklists and examples for schools to use when developing their compacts. KSDE also requires LEAs, if selected for data verification, to provide documentation of Title I school campus compacts. KSDE reviewed this question in the 2024-2025 school year and provided documentation of example school-parent compacts that meet all requirements.

ESEA section 1111(d)(1)(B) and 1111(d)(2)(B) require an LEA or school to develop and implement support and improvement plans in partnership with stakeholders, including parents.<sup>2</sup> KSDE shared that it included this requirement in a recent training for LEAs and provided corresponding documentation. During the desk review, KSDE confirmed that it does not have set processes to check that LEAs and schools include parents when developing and implementing support and improvement plans.

#### Parents Right-to-Know and Notification

ESEA section 1112(e)(1)(A) requires an LEA to provide information at the start of a school year to parents and families regarding their right to request the professional qualifications of teachers. ESEA section 1112(e)(1)(B) requires each Title I school to share information regarding student academic achievement and growth and to provide notification if a student has been taught for four or more consecutive weeks by a teacher who does not meet State requirements. KSDE provided documentation of accurate, complete guidance through a parent and family engagement fact sheet, annual LEA

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<sup>2</sup> This targeted monitoring engagement reviewed parent and family engagement requirements for support and improvement plans but did not review all relevant support and improvement plan requirements under ESEA section 1111(d).

certification, notification letter template, and monitoring materials within the State’s ESEA consolidated review guidance regarding these requirements. KSDE also provided documentation that it requires LEAs to submit evidence of these communications to parents and families (i.e., dated notification letter) consistent with the requirements in ESEA section 1112(e)(1) during annual monitoring.

ESEA section 1112(e)(2) requires that LEAs notify parents of certain testing transparency requirements such as providing timely information to parents that they may request any State or LEA policy regarding student participation in any assessments mandated by 1111(b)(2) and by the State or LEA, including a policy, procedure, or parental right to opt the child out of such assessment, where applicable. KSDE submitted documentation that it provides all parents with information on the State policies regarding student assessments. During the desk review, KSDE clarified that it has no State policy on a parent’s right to opt a child out of assessments and that LEAs set and communicate these policies. KSDE indicated that while LEAs report the number of students who opt out in its annual reporting, the State does not have a process to ensure that each LEA provides timely information to parents and families that they may request LEA policies regarding student participation in required assessments.

#### Technical Assistance

KSDE provides technical assistance to LEA and schools through a variety of methods. It maintains an updated fact sheet which describes the parent and family engagement requirements under Title I and LEA and school responsibilities for implementation. The SEA includes a section on parent and family engagement in its program director handbook used by ESEA program directors across the State. KSDE offers quarterly technical assistance meetings on developing and implementing the LEA consolidated plan, which includes sessions on parent and family engagement requirements. KSDE also partners with the Kansas Parent Information Resource Center (KPIRC) to provide technical assistance and resources for LEAs and schools. The KPIRC is part of the Kansas Technical Assistance System Network (TASN) which has projects designed to increase the capacity of LEAs to implement and sustain evidence-based practices. KSDE partners with the KPIRC to develop parent and family engagement toolkits, resources for parents to engage in their child’s learning, and to collect and disseminate information about effective parent and family engagement strategies. For example, during the desk review, KSDE indicated that KPIRC administers an annual survey that gathers feedback from over 60,000 parents and families and frequently presents to school and LEA leaders (e.g., Great Ideas Conference July 2025) on its findings.

#### **Required Actions**

Within 60 business days, KSDE must submit:

1. Updated processes (e.g., guidance to LEAs, internal instructions for reviewers of consolidated local plans, updated monitoring procedures) to ensure that each LEA gives priority to high-need schools when manually distributing parent and family engagement reservation funds to schools.
2. Evidence (e.g., updated guidance, monitoring protocol) that it ensures LEAs serving Title I schools develop and implement parent and family engagement policies consistent with ESEA section 1116(a)(2), including the distribution of completed policies to parents and families.
3. Updated monitoring procedures to ensure that each LEA serving Title I schools:
  - a. Carries out activities and strategies consistent with the LEA’s parent and family engagement policy and allowable uses of funds, including at least one of the uses specified in ESEA section 1116(a)(3)(D).
  - b. Ensures that Title I school-level parent and family engagement uses of funds are allowable and aligned with school-level parent and family engagement policies.
  - c. Submits any parent comments to KSDE regarding an unsatisfactory local plan as required under ESEA section 1116(b)(4).

- d. Meets the accessibility requirements under ESEA section 1116(f), including how KSDE ensures that LEAs receiving Title I funding reduce barriers and provide opportunities for the participation of parents and family members with disabilities and parents and family members of migratory children in parent and family engagement activities.
  - e. Monitors to ensure Title I school-level parent and family engagement policies meet the requirements of ESEA section 1116(c)(2)-(5).
4. Evidence (e.g., guidance for support and improvement plans, internal review process, or monitoring protocol) that it ensures schools and LEAs involve parents in the development of support and improvement plans.
  5. Evidence (e.g., guidance, updated program director handbook, monitoring protocol) that ensures LEAs provide timely information to parents that they may request, information regarding the LEA policy, procedure, or parental right to opt the child out of assessments mandated by ESEA section 1111(b)(2), where applicable.

### **Recommendations**

The Department recommends that KSDE, collect an explanation of the method an LEA uses to prioritize high-need schools when distributing 90 percent of funds reserved for parent and family engagement in the consolidated local application and that KSDE update its guidance with example methods (e.g., highest percentage of students in poverty, low academic achievement, identification for support and improvement).

The Department also recommends that KSDE update its parent and family engagement materials (e.g., quarterly local consolidated application presentations, ESEA consolidated review materials, 2009 school parent compact guide, and other guidance) to update all citations to align with the ESEA, as amended by the Every Student Succeeds Act (e.g., section 1116(c)-(f)) rather than the ESEA, as amended by the No Child Left Behind Act of 2001 (e.g., ESEA section 1118(c)-(f)).

Finally, the Department recommends KSDE update its monitoring protocol to check that an LEA uses the findings of its Title I annual evaluation to design evidence-based strategies for more effective parental involvement, and to revise, if necessary, their subsequent parent and family engagement policies.