

ESEA: Title III, Part A 2019-2020 Annual Report

**Language Instruction for English Learners and
Immigrant Students**

**Part A: English language acquisition, language
enhancement, and academic achievement act**



March 31, 2021



Contents

Title III, Part A Program Staff	3
Grant Implementation Overview	3
Title III Statute Overview	5
2019-2020 State Education Agency (SEA) Grant Allocation	6
Title III, Part A SEA Grant Administration Activities	7
Title III, Part A SEA State Activities	10
2019-2020 Title III, Part A Recipient Local Education Agencies (LEAs)	16
2019-2020 Title III, Part A Program Grant Administration	16
Consolidation of Funds	23
Maintenance of Effort	23
2019-2020 Private School Participation in Title III, Part A Equitable Services	24
2019-2020 LEA Identified Strengths and Challenges of EL Programs	26
2019-2020 LEA Title III, Part A Budgeted Funds	27
2019-2020 LEA Title III, Part A English Learner Program Expenditures	30
2019-2020 LEA Title III, Part A Immigrant Program Expenditures	31
2019-2020 State & LEA English Learner Assessment Data	32
Reporting Requirements under ESEA/ESSA	32
2019-2020 LEA Self-Reported Effectiveness of Title III, Part A Funded Activities	35
2019-2020 Use of Title III, Part A Subgrant Award Funds - LEA Flexibility	36
2019-2020 Title III, Part A Monitoring Processes	36
2019-2020 Title III, Part A Cross-functional Monitoring (CFM) Results	37
Two Year Summary of Title III, Part A Monitoring Finding Indicators	39
2019-2020 Title III, Part A Audit Resolutions/ Financial Reviews Completed	39

Title III, Part A Program Staff

Georgia Department of Education

Federal Programs Division

Program Manager

Split-funded Title III, Part A Consolidated Administration & State ESOL Program

- Margaret E. D. Baker, Ed.D.

Title III, Part A Education Program Specialists (4)

Split-funded Title III, Part A Grant Administration & Title III, Part A State Activities

- Adria Griffin, Ed.D., Northeast Georgia & Metro East LEAs
- Michael David Tucker, Northwest Georgia & Metro West LEAs
- Ana Delia Roberts, Central Georgia LEAs
- Tammie Smith, South Georgia LEAs

ESOL & Title III, Part A Professional Learning Specialists (2)

Split-funded Title III, Part A State Activities and State ESOL Program

- Ariana Magee, Ed.D., North Georgia & Metro LEAs
- Jacqueline C. Ellis, Ed.D., Central & South Georgia LEAs

Grant Implementation Overview

In Georgia, the Georgia Department of Education (GaDOE) sets policy, develops guidance, and provides training and technical assistance for Georgia local education agencies (LEAs). Four Title III, Part A program specialists provide technical assistance by assigned region, currently organized by Regional Educational Service Agency (RESA) regions. Training is coordinated at the state level and delivered through (a) a bi-annual Federal Programs Conference, (b) collaborative Federal Programs' regional sessions and webinars, (c) specific Title III, Part A Program regional webinars, and (d) training courses posted on the GaDOE State Longitudinal Data System (SLDS) Professional Learning Opportunities (PLO) platform. The Title III, Part A Program publishes an annual Title III, Part A Handbook and maintains a public webpage on the GaDOE Federal Programs website.

During the 2019-2020 school year, the governor of Georgia issued an executive order to close schools on March 16, 2020 due to a global pandemic.

During the 2019-2020 school year, Governor Brian Kemp issued an executive order to close Georgia schools on March 16, 2020 due to a global pandemic (COVID-19). LEAs continued providing instruction to students through distance learning for the remainder of the school year. The GaDOE continued to provide technical assistance for LEAs during school closures through Frequently Asked Questions (FAQs), updates, webinars, and online professional development courses including guidance on Covid-19 responses, Coronavirus Aid, Relief, and Economic Security (CARES) Act funding, distance learning strategies and Fiscal Year (FY) 21

ESSA funds.

The Federal grant is cyclical in nature beginning in July and ending in September of the following year – a 15-month grant cycle. In Georgia, LEAs begin the Federal grant process by completing an internal Comprehensive Needs Assessment (CNA) and consolidated Federal grant application called the Consolidated LEA Improvement Plan (CLIP). The application is maintained in the State Longitudinal Data System (SLDS) and is supported by regional Continuous Improvement Teams (CITs). These teams provide LEAs with continuous improvement support as part of the common framework for supporting schools and LEAs, called Georgia’s Systems for Continuous Improvement (GSCI), developed, and adopted by GaDOE. Once the CLIP is approved, LEAs submit a budget in the state MyGaDOE Consolidated Application (ConAPP) portal, based on their subgrant award allocation from the state. After budget approval, LEAs administer the grant, submitting budget adjustments, called amendments, as needed throughout the 15-month period of the subgrant performance.



Based on the Tydings amendment, LEAs have a full 27-month period to obligate Title III, Part A English Learner, and Immigrant subgrant funds and there is no Federal statutory limitation to the amount of unexpended Title III, Part A funds an LEA can carry over from the first year to the next. Nevertheless, it is expected that LEAs draw down funds regularly throughout the fiscal year and expend all funds to implement its approved local plan consistent with its approved local budget which will benefit English Learner (EL) and immigrant students for whom the subgrants were awarded. LEAs’ work is supported by assigned specialists; however, LEAs requiring targeted support may be further assisted by Continuous Improvement Teams (CITs) comprised of staff across three GaDOE Divisions: Federal Programs, School and District Effectiveness, and Teaching and Learning.

Title III, Part A Program Specialists provide timely technical assistance to LEAs as necessary to ensure LEA compliance with State and Federal laws and nonregulatory and EDGAR guidance. In addition to technical assistance sessions, Program Specialists

provide LEAs with professional learning opportunities through individual trainings, regional trainings, recorded webinars, and state conferences.

LEAs are formally monitored for compliance through the GaDOE Cross-Functional Monitoring (CFM) process every four years, and/or more frequently depending on annual risk assessment results. In FY20, Title III, Part A Program Specialists monitored LEAs in their assigned region; however, in future monitoring cycles Title III, Part A Program Specialists will monitor LEAs outside their assigned region. This practice will encourage objectivity and foster a stronger alignment of expectations and technical assistance across the state.

Generally, CFM processes may be conducted onsite or via desktop monitoring; however, in FY20, after the governor issued an executive order to close schools due to the global pandemic, monitoring schedules were adjusted to include only desktop monitoring. Immediately following the school closures, 18 LEA scheduled monitoring dates were suspended until the Fall of 2020; however, seven LEAs opted to continue with desktop monitoring as scheduled. Therefore, of the 33 LEAs on the Title III, Part A monitoring cycle for FY20, 15 were monitored in spring 2020 and the other 18 were monitored in fall 2020. LEAs receiving findings as part of the Cross-Functional Monitoring completed corrective actions to ensure written internal controls and protocols are established and implemented per federal law, federal regulations (EDGAR), and federal and state guidance. Based on the GaDOE 4-year CFM cycle, any LEA that does not participate in cross-functional monitoring completes an annual self-monitoring review.

Immediately following the school closures, 18 LEA monitoring dates were suspended until the Fall of 2020; however, seven LEAs opted to continue with desktop monitoring as scheduled.

In Georgia, LEAs are required to have an external audit each year. Any audits from prior fiscal years that require program review are reported by the Georgia Department of Audits to GaDOE and GaDOE program staff resolve these audits. These are resolved directly with the LEAs.

LEAs conclude the federal fiscal year with a completion report, finalized in the Grants Accounting Online Reporting System (GAORS).

Title III Statute Overview

The Title III Statute *Language Instruction for English Learners and Immigrant Students* includes the following sections of the Elementary and Secondary Educational Act (ESEA):

- **Section 3001** Authorization of Appropriations.
- **Sections 3101-3131**
 - **Part A** – English Language Acquisition, Language Enhancement, and Academic Achievement Act

- Subpart 1 – Grants and Subgrants for English Language Acquisition and Language Enhancement
- Subpart 2 – Accountability and Administration
- Subpart 3 – National Activities
- **Sections 3201-3203**
 - **Part B** – General Provisions

The GaDOE *Title III, Part A Annual Report* includes activities and information as referenced in Title III statute. Thus, the relevant statute sections serve as an outline and framework for each section of the following report.

2019-2020 State Education Agency (SEA) Grant Allocation

Based on the Department of Defense and Labor, Health and Human Services, and Education Appropriations Act, 2019 and Continuing Appropriations Act, 2019, the United States Department of Education (ED) authorizes annual appropriations to States that include the Title III, Part A Grant as outlined in the Elementary and Secondary Education Act (ESEA) of 1965 and amended through P.L. 115-141, by the Every Student Succeeds Act (ESSA) of 2015, enacted March 23, 2018.

ESEA Section 3111. FORMULA GRANTS TO STATES

(A) IN GENERAL. –

“In the case of each State educational agency having a plan approved by the Secretary for a fiscal year under section 3113, the Secretary shall make a grant for the year to the agency for the purposes specified in subsection (b). The grant shall consist of the allotment determined for the State educational agency under subsection (c).”

FY20 Grant and Subgrant Award Information	Total
FY20 Title III, Part A Grant Award from ED to GaDOE	\$15,665,457
FY20 Title III, Part A SEA Reservation for Title III State Activities and GaDOE Federal Programs Consolidated Grant Administration (5%)	(\$783,272)
FY20 Title III, Part A Flowthrough to LEAs:	\$14,882,185
• FY20 Title III, Part A English Learner Subgrant Awards from GaDOE to LEAs (90%)	\$14,138,076
• FY20 Title III, Part A Immigrant Subgrant Awards from GaDOE to LEAs (5%)	\$744,109

Section 3111(c) (3) USE OF DATA FOR DETERMINATIONS. – *“In making State allotments under paragraph (2) for each fiscal year, the Secretary shall –*

- (A) determine the number of English learners in a State and in all States, using the most accurate, up-to-date data, which shall be –
- (i) data available from the American Community Survey conducted by the Department of Commerce, which may be multiyear estimates.
 - (ii) the number of students being assessed for English language proficiency, based on the State’s English language proficiency assessment under section 1111(b)(2)(G), which may be multiyear estimates; or
 - (iii) a combination of data available under clauses (i) and (ii); and
- (B) determine the number of immigrant children and youth in the state and in all States based only on data available from the American Community Survey conducted by the Department of Commerce, which may be multiyear estimates.”

Title III, Part A SEA Grant Administration Activities

ESEA Sec. 3111 - FORMULA GRANTS TO STATES

(B) USE OF FUNDS. -

(2) STATE ACTIVITIES - *“Each State educational agency receiving a grant under subsection (a) may reserve not more than 5 percent of the agency’s allotment under subsection (c) to carry out one or more of the following activities:”*

(D) *“Providing technical assistance and other forms of assistance to eligible entities that are receiving subgrants from a State educational agency under this subpart, including assistance in (i) identify and implementing effective language instruction educational programs and curricula for teaching English learners; (ii) helping English learners meet the same challenging state academic standards that all children are expected to meet; (iii) identifying or developing, and implementing, measures of English proficiency; and (iv) strengthening and increasing parent, family and community engagement in programs that serve English learners.”*

(3) DIRECT ADMINISTRATIVE EXPENSES. – *“From the amount reserved under paragraph (2), a State educational agency may use not more than 50% of such amount or \$175,000, whichever is greater, for the planning and direct administrative costs of carrying out paragraphs (1) and (2).”*

Title III, Part A grant administration activities are completed by the GaDOE Title III, Part A Program staff consisting of one Program Manager and four Title III, Part A Education Program Specialists (See Page 3 for more information).

In 2019-2020, the following grant administration activities were accomplished by this team:

1. Technical assistance provided to 97 Title III-recipient LEAs
2. Trainings held in conjunction with Federal Programs
 - a. Fall 2019
 - i. Title III-A Budget Overview
 - ii. Data Collections Conference
 - iii. GaDOE Monitoring Overview
 - iv. Equitable Services Overview
 - v. GaDOE Consolidation of Funds (COF) LEA Working Session
 - vi. GaDOE Consolidation of Funds (COF) FY21 Preparation Workshop
 - vii. Title III, Part A COF Monitoring Training
 - b. Winter/Spring 2020
 - i. Title III, Part A and ESOL Directors Town Hall Meetings by RESA region (16)
2. Trainings held at regional and state conferences
 - a. GCEL, March 2020, breakout sessions as indicated below in collaboration with other Federal Programs.
 - i. *Leveraging Federal Funds for Successful EL Language Services – Without Title III-A - Help!*
 - ii. *Blazing a Trail from the CLIP to the EL Program Plan to the Title III-A Budget*
 - iii. *Working Smarter with EL Data*
 - iv. *Internal Controls*
 - v. *Dive into ESSA Professional Development Definition and Allowability of Funding Conferences*
 - vi. *Leveraging Federal Funding Processes When Measuring Professional Learning Effectiveness*
 - vii. *Removing Barriers to Meaningful Parent-School Partnerships*
 - viii. *Coordination and Connectivity: Maximizing Federal Programs Collaboration for Student Success*
3. Resources developed for LEAs
 - a. Infographics:
 - i. *Title III, Part A Budget Amendment Flowchart*
 - ii. *From the Bottom Up – Title III, Part A Budget Tips*
 - iii. *Identifying and Supporting Immigrant Students and their Families*
 - iv. *CLIP Process*
 - v. *Self-Monitoring*
 - vi. *Differences Between Title III-A and ESOL*
 - vii. *ESOL Language Program – LEA’s Legal Obligations*
 - b. Presentations posted on website and in PLO platform
 - i. *Title III, Part A New Directors’ Course*
 - ii. *From CLIP to Plan to Budget*
 - iii. *FY 20 Cross Functional Monitoring – Process, Indicators, & Documentation*
 - iv. *Self-Monitoring Your Title III-A Program*

- v. *Title III, Part A Budgeting*
 - vi. *Title III, Part A Supplemental Services*
 - vii. *Reporting Accurate English Learner & Immigrant Data – Making Your Data Count!*
 - viii. *Ensuring Accurate EL and Immigrant Data*
 - ix. *EL Entrance Procedures*
 - x. *EL Exit Procedures*
 - xi. *State and Federal Policies Regarding English Learners*
 - xii. *Identifying and Supporting Immigrant Children and their Families*
 - xiii. *Engaging Parents of English Learners*
 - c. Guidance documents posted on website
 - i. *Title III, Part A Program Handbook*
 - ii. *A Resource Guide to Support School Districts’ English Learner Language Programs (EL Entrance & Exit Procedures)*
 - iii. *FY 20 Guide for Title III, Part A Cross-Functional Monitoring*
 - d. Miscellaneous tools posted on website
 - i. *FY20 Budget Submission Checklist*
 - ii. *FY20 Chart of Accounts*
 - iii. *FY20 Budget Guiding Questions*
 - iv. *Title III, Part A Budget FAQs*
 - v. *FY20 Field Trip Approval Form (English Learner)*
 - vi. *FY20 Field Trip Approval Form (Immigrant)*
4. Review of LEA’s CLIP, Program Plan & Budgets
(Source for information in b & c: FY20 MyGaDOE ConApp Report)
- a. 217 approved CLIPs
 - b. 94 approved original English Learner budgets
 - c. 91 approved EL budget amendments (see details below)
 - i. 91 budgets had an approved amendment 1
 - **Note:** In FY20 three LEAs (Banks, Brooks and Hart) received a Title IIIA EL subgrant award for the first time, and therefore, submitting a budget amendment for unexpended FY19 funds was not applicable.
 - ii. 46 budgets had an approved EL Budget Amendment 2
 - iii. 17 budgets had an approved amendment 3
 - iv. 7 budgets had an approved amendment 4
 - v. 2 budgets had an approved amendment 5
 - d. 47 approved original Immigrant budgets
 - i. 21 budgets had an approved amendment 1
 - ii. 5 budgets had an approved amendment 2
 - iii. 1 budget had an approved amendment 3
5. Cross-functional monitored the following number of LEAs:
- a. Northwest –
 - i. Winter/Spring 2019 – 6 LEAs
 - ii. Fall 2020 – 2 LEAs
 - b. Northeast –
 - i. Winter/Spring 2019 – 4 LEAs

- ii. Fall 2020 – 2 LEAs
- c. Central –
 - i. Winter/Spring 2019 – 1 LEA
 - ii. Fall 2020 – 6 LEAs
- d. South –
 - i. Winter/Spring 2019 – 4 LEAs
 - ii. Fall 2020 – 8 LEAs

Title III, Part A SEA State Activities

In 2019-2020, the GaDOE Title III, Part A State Activities program was led by the Title III, Part A State Activities team, consisting of one Program Manager, four Title III, Part A Education Program Specialists, and two Professional Learning Specialists. The following state activities are organized according to relevant sections of Title III, Part A statute.

ESEA Sec. 3111(b)(2)(B) –

1. *“Establishing and implementing standardized statewide entrance and exit procedures, including a requirement that all students who may be English learners are assessed for such status within 30 days of enrollment in a school in the State.”*

All LEAs in the state are required to implement the standardized statewide entrance and exit procedures to identify English learners within 30 days of enrollment in a school in Georgia. During cross-functional monitoring, Title III, Part A Program Specialists review LEA English learner data rosters and student level documentation to ensure that these procedures are being implemented in a standardized manner across the LEA and state.

Throughout the school year, the Title III, Part A Program Specialists and Manager provide technical assistance on EL entrance and exit procedures to all LEAs by region and statewide upon request from LEA, during Cross-functional monitoring, and through resource development and training.

2. *“Providing effective teacher and principal preparation, effective professional development activities, and other effective activities related to the education of English learners.”*

The Title III, Part A State Activities Program, often in conjunction with the WIDA Consortium, of which Georgia is a member state, offered a variety of optional professional learning activities in the 2019-2020 school year for teachers and administrators who work with English learners. Some of these were self-paced eWorkshops housed on the WIDA Consortium’s secure portal eLearning platform, some were WIDA-facilitated in-person workshops held regionally by RESA region, and some were in-person and virtual professional learning (PL) opportunities

provided by GaDOE Professional Learning Specialists as extensions of the WIDA-facilitated workshops.

LEA ESOL coordinators and Title III directors received notification of these opportunities and worked with GaDOE and internal staff to register participants. Charts 1-5 on pp.11-13 provide information on the outputs from these professional learning opportunities, in terms of the number of educators who participated, were engaged, and completed the workshops.

Chart 1: Educator Engagement in WIDA Self-Paced eWorkshops - September 1, 2019 – August 30, 2020*

eWorkshop Name	Number of Educators			
	Not Begun	In Progress	Completed	Total Enrolled
<i>Classroom Teachers: Engaging Multilingual Newcomers</i>	941	418	672	2031
<i>Developing Language for Learning in Mathematics</i>	1382	374	275	2031
<i>Doing and Talking STEM</i>	1726	136	169	2031
<i>Foundational Concepts</i>	1461	329	241	2031
<i>Leading for Equity: Classroom Walkthrough</i>	1621	234	176	2031
<i>WIDA Writing Rubric</i>	1614	268	149	2031
Totals	8745	1759	1682	12,186
	72%	14%	14%	

Chart 2: Number of WIDA Self-Paced eWorkshops Completed as of August 30, 2020*.

eWorkshop Name	Number of Educators Completing Course	Percentage of Educators Completing Course
<i>Classroom Teachers: Engaging Multilingual Newcomers</i>	672	40%
<i>Developing Language for Learning in Mathematics</i>	275	16%
<i>Doing and Talking STEM</i>	169	10%
<i>Foundational Concepts</i>	241	14%
<i>Leading for Equity: Classroom Walkthrough</i>	176	10%
<i>WIDA Writing Rubric</i>	149	9%

*The WIDA professional learning calendar year runs from September to August.

3. *“Improving teaching skills in meeting the diverse needs of English learners, including how to implement effective programs and curricula on teaching English learners.”*

GaDOE Professional Learning Specialists facilitated PLC Cohorts as an extension of four different WIDA Workshops, three were offered across the state in the 2018-2019 school year and one was a new WIDA workshop in SY2019-2020.

Chart 3: GaDOE/WIDA PLC Cohort Attendance, August 2019 – March 2020

Workshop Name	Number of Educators			
	Total Enrolled	First Session	Second Session	Third Session
<i>Lesson Planning for Multilingual Learners</i>	17	11	6	8
<i>Scaffolding Learning through Language</i>	26	15	11	17
<i>Formative Language Assessment</i>	15	9	12	11
<i>Education Collaboration to Support Multilingual Learners</i>	21	21	16	NA
Totals:	79	56	45	36

In 2019-2020, GaDOE Professional Learning Specialists and the Program Manager facilitated five one-day professional learning workshops called *Building Academic Language for English learners* that included six one-hour breakout sessions by rotation. Each breakout session highlighted one of six high leverage practices for teaching English learners based on research. These one-day workshops were held regionally as requested by LEAs or by RESA region.

Chart 4: One-Day Workshops: *Building Academic Language for English Learners*

RESA Region or LEA	Date Presented	Number of Attendees
Appling County & Jeff Davis County School Districts	January 6, 2020	73
Northeast GA RESA LEAs	January 9, 2020	88
Coastal Plains RESA LEAs	January 14, 2020	80
Commerce City Schools	February 14, 2020	107
Okefenokee RESA LEAs	March 4, 2020	59
Total:		407

Participants were invited to complete an overall feedback form after each professional learning workshop. Chart 5 reports the outcomes of the PL sessions in terms of participants' perceptions that the workshops were valuable and relevant to their classroom practices with English learners.

Chart 5: Requested Participant Feedback - Outputs/Outcomes

RESA Region or LEA	Total Participants	Total Feedback Responses	Total Indicated “Agree and Strongly Agree” Workshop was Valuable	Percentage Positive Feedback Per Respondents
Appling County & Jeff Davis County School Districts	73	25	24	96%
Northeast GA RESA LEAs	88	31	30	97%
Coastal Plains RESA LEAs	80	65	65	100%
Commerce City Schools	107	28	19	68%
Okefenokee RESA LEAs	59	41	37	90%
Totals:	407	190	175	92%

In collaboration with GaDOE Curriculum and Instruction, the Title III, Part A State Activities Professional Learning Specialists presented at various conferences in 2019-2020 and provided LEAs with instructional tools and resources on the ESOL Language Program website.

- GATESOL Annual Conference, October 2019, breakout sessions in collaboration with GaDOE Curriculum & Instruction:
 - *Science and the English Learner: Ensuring ELs Obtain, Evaluate and Communicate the Language of Science*
 - *Narrative Writing Strategies for English Learners and Students with Disabilities*
- Website resources:
 - *Strategies for Assisting English Learners Online*
 - *Online Resources for ESOL Teachers to use with English Learners*
 - *Suggestions for Online ESOL Classes and Activities*
 - *Resources for Parents to use at Home with their English Learners*
 - *ESOL Teacher Strategies for Distance Learning*

4. ESEA Sec. 3111(b)(2)(D)(II) – *“helping English learners meet the same challenging State academic standards that all children are expected to meet;”*

Crosswalk WIDA Resources for Georgia Standards of Excellence Initiative

According to the ESEA Section 1111(b)(2)(G), English Language Proficiency (ELP) assessments must be aligned to the ELP standards under section 1111(b)(1)(F) and must measure EL students’ proficiency levels annually in the four recognized domains of language: listening, speaking, reading, and writing. *“ELP Standards refer to instructional standards for ELs that are derived from the four recognized language domains, that*

address the different proficiency levels of ELs, and that align or correspond with the challenging state academic standards. This alignment is defined as ELP standards alignment with state academic content standards.” (A State’s Guide to the USDE Assessment Peer Review Process, June 22, 2018, p. 23) These standards may also be referred to as English language development standards.

“The statutory requirement that ELP standards be “aligned with” the state’s academic standards means that ELP standards correspond to the state academic standards. ELP standards should contain language proficiency expectations that reflect the language needed for ELs to acquire and demonstrate their achievement of the knowledge and skills identified in the state’s academic content standards appropriate to each grade in at least reading/language arts, mathematics, and science.” (A State’s Guide to the USDE Assessment Peer Review Process, June 22, 2018, p. 24)

Given evidence that the State had not recently aligned WIDA’s current ELD Standards with Georgia’s current Standards of Excellence (GSE), a working committee of 75 regular education teachers, ESOL teachers, and instructional coaches met in January 2019 to determine the correspondence of WIDA’s ELD Standards Framework resources to the GSE by grade-level and content-area. The resulting documents comprise the *Crosswalk WIDA Resources* which were reviewed by a cross-divisional advisory committee composed of internal and external educators and subject matter experts. In the 2019-2020 school year, the *Crosswalk WIDA Resources’* associations between both sets of standards were digitized into the *OpenSalt* platform in collaboration with GaDOE Georgia Virtual School staff.

Following a pilot study in 2020-2021, the Crosswalk WIDA Resources are expected to be disseminated throughout the state via the SLDS Platform for teachers to use during instructional planning.

5. Collaborative Monitoring of the ELP Assessment Participation Rate

The ESEA and its implementation regulations require a State to ensure that its LEAs “provide an annual ELP assessment of all ELs in grades K-12 in schools served by the state (Section 1111(b)(2)(G) and 34 CFR §200.6(h). The ESEA requires a state to develop a uniform statewide ELP assessment to measure the English language proficiency of all ELs in the state, including ELs with disabilities, with an exception for EL students with the most significant cognitive disabilities are who may take an alternate ELP assessment (AELPA) if they cannot participate in the regular ELP assessment even with accommodations.”

In addition, Title III, Part A statute in Section 3113(b)(3) requires that the state plan to ED provide an assurance that “the agency will ensure that eligible entities receiving a subgrant under this subpart annually assess the English proficiency of all English learners participating in a program funded under this subpart, consistent with section 1111(b)(2)(G);”

Thus, in October 2019, GaDOE calculated LEA’s 2019 ELP Assessment Participation Rate using the following business rules:

- The number of identified English learners enrolled in the LEA during the WIDA ACCESS for ELLs testing window who have a *WIDA ACCESS for ELLs*® Overall Composite Proficiency Level (CPL), or with regards to English learners with disabilities, have the relevant language subtests as selected by the Individualized Education Program (IEP) team, divided by the number of identified English learners enrolled in the LEA during the *WIDA ACCESS for ELLs*® administration window. If students were tested on some of the four language domain subtests, but not all, and if the reason codes reported were “Absent” or “Blank”, or if an EL student’s Georgia Test Identifier (GTID) did not match any completed ACCESS test, that student would be counted as a non-participant.

In November 2019, Federal Programs’ Title I, Part A and Title III, Part A collaborated with the GaDOE Assessment Division to communicate to LEAs their 2019 ELP Assessment Participation Rate and to provide technical assistance and training to LEAs. Title I, Part A and Title III, Part A added guidance to their respective Handbooks on their respective websites. (See 2019 ELP Assessment Participation Rate Summary in Chart 6)

LEAs with 100% participation were congratulated in a Federal Programs Update. LEAs with ELP Assessment Participation Rates below 100% received an email communication encouraging them to identify the reasons or categories of reasons that caused some EL students not to be assessed, and to establish and implement procedures to ensure all EL students are annually assessed on the ELP Assessment. If an LEA was on the Cross-functional monitoring cycle in the 2019-2020 school year, and if the LEA’s ELP Assessment Participation Rate was below 95%, the CFM report for the LEA’s ELP Assessment Indicator was “Met with Recommendation”.

Chart 6: 2018-2019 ELP Assessment Participation Rate

Source: Federal Programs Internal Records

State 2019 ELP Assessment Participation Rate = 97%	
LEA ELP Assessment Participation Rates Compared to Title I, Part A Threshold	Number of LEAs
ELP Assessment Participation Rate = 100%	59
ELP Assessment Participation Rate = 95-99%	84
ELP Assessment Participation Rate < 95%	53
Total LEAs with EL Students	196*

*LEAs in Georgia with zero English learner students did not receive a rating.

2019-2020 Title III, Part A Recipient Local Education Agencies (LEAs)

Total Local Education Agency Grantees	
Traditional School Districts	92
LEA Regional Title IIIA Consortium	1
Charter Schools (State Level)	1
State Schools (3)	0
Special LEAs <i>Dept. of Corrections, Dept. of Juvenile Justice</i>	0



2019-2020 Title III, Part A Program Grant Administration

Title III, Part A English Learner Subgrant Grant Awards

Citations

Elementary and Secondary Education Act of 1965, as Amended through P.L. 115-141, Enacted March 23, 2018, Sections 3001 - 3203

CFDA: 84.365A

Formula Grant Overview

Title III, Part A is a formula grant, calculated annually, and comprised of **two separate allocations** at the LEA level based on EL and immigrant student populations in both public and participating private, nonprofit schools in Georgia.

The Title III EL subgrant is calculated based on the public school EL=Yes (EL-Y) student population count as reported to the state by LEAs during the March FTE/QBE Data Collections count. The allocation should bear the same relationship to the amount received by the State and remaining after making the required reservation as the population of English learners in schools served by the eligible entity bears to the population of English learners in schools served by all eligible entities in the State. **Title III Sec. 3114(a)**

In addition, LEAs with participating private schools report to the state, by May 1, the number of EL students in participating private schools. These LEAs will also use the

Equitable Services for Private Schools (EQ4PS) platform in the State Longitudinal Data System (SLDS) to report to the state this same information by June 30 each year.

LEAs are invited to form or join a regional LEA consortium to meet the EL student population threshold to be eligible for a Title III, Part A English learner subgrant award. In 2019-2020, four LEAs formed the Multi-Regional Collaborative Consortium (MRCC): Crawford, Jasper, Jones, and Twiggs, with Jasper serving as the lead fiscal agent.

In 2019-2020, 94 Title III, Part A English Learner subgrants were allocated to qualifying LEAs in July 2019. One hundred percent of FY19 Title III, Part A English Learner unexpended funds were distributed to LEAs following the submission of FY19 Completion Reports and approval of an original FY20 budget.

Number of English learners needed to meet the \$10,000 threshold to be eligible to receive a Title IIIA English Learner Subgrant award.	89
Number of LEAs eligible to receive a Title III, Part A English Learner Subgrant Award	94

To support LEAs in expending subgrant funds in a timely manner to benefit the students for whom it was intended, GaDOE staff sent quarterly updates to LEAs, and provided technical assistance as needed. The most common reasons for carryover in Title IIIA include unexpected challenges implementing program plans due to school closures and personnel changes.

Chart 7: Title III, Part A FY20 English Learner Subgrant Allocations and FY19 English Learner Subgrant Carryover by LEA

	LEA Name	FY20 EL Allocation (July 2019)	FY19 EL Carryover (Jan. 2020)
	TOTAL	\$14,138,076	\$2,675,877
1	Appling County	\$31,134	\$3,993
2	Atkinson County	\$24,202	\$1,471
3	Atlanta Public Schools	\$240,967	\$71,791
4	Bacon County	\$11,161	\$62
5	Banks County	\$11,514	0
6	Barrow County	\$135,580	\$7,868
7	Bartow County	\$78,247	\$24,440
8	Bibb County	\$64,031	\$2,911
9	Brooks County	\$11,044	0
10	Bryan County	\$15,743	\$5,296
11	Buford City	\$61,446	0

	LEA Name	FY20 EL Allocation (July 2019)	FY19 EL Carryover (Jan. 2020)
	TOTAL	\$14,138,076	\$2,675,877
12	Bulloch County	\$28,197	\$2,397
13	Calhoun City	\$63,326	\$8,775
14	Carroll County	\$43,000	\$2,626
15	Carrollton City	\$38,653	\$20,306
16	Cartersville City	\$47,935	\$1,370
17	Catoosa County	\$15,626	0
18	Chatham County	\$180,461	\$13,113
19	Cherokee County	\$353,872	\$9,749
20	Clarke County	\$167,772	\$51,877
21	Clayton County	\$625,855	\$95,202
22	Cobb County	\$1,274,385	\$778,288
23	Coffee County	\$65,793	\$21,467
24	Colquitt County	\$172,589	0
25	Columbia County	\$69,318	\$5,031
26	Commerce City	\$11,279	\$6,008
27	Cook County	\$14,216	\$589
28	Coweta County	\$64,148	\$4,522
29	Crawford County (MRCC)	(See Jasper)	0
30	Dalton City	\$190,917	\$45,147
31	Dawson County	\$14,216	\$568
32	Decatur City	\$14,333	0
33	Decatur County	\$23,028	\$4,968
34	DeKalb County	\$1,793,092	\$461,346
35	Dooly County	\$10,574	\$11,221
36	Dougherty County	\$28,079	\$4,415
37	Douglas County	\$181,400	\$26,381
38	Echols County	\$16,918	\$3,311
39	Effingham County	\$20,443	\$4,763
40	Emanuel County	\$13,159	\$845
41	Evans County	\$25,025	\$3,649
42	Fayette County	\$103,859	\$11,005
43	Floyd County	\$43,470	\$15,583
44	Forsyth County	\$390,998	\$55,234
45	Franklin County	\$14,451	\$1,811
46	Fulton County	\$785,638	\$171,933
47	Gainesville City	\$278,797	\$32,988

	LEA Name	FY20 EL Allocation (July 2019)	FY19 EL Carryover (Jan. 2020)
	TOTAL	\$14,138,076	\$2,675,877
48	Gilmer County	\$66,968	\$9,682
49	Glynn County	\$88,585	0
50	Gordon County	\$43,705	\$6,689
51	Grady County	\$55,572	\$10,077
52	Greene County	\$16,566	\$7,373
53	Griffin-Spalding County	\$35,716	\$1,345
54	Gwinnett County	\$3,256,865	\$124,858
55	Habersham County	\$116,900	\$4,453
56	Hall County	\$626,325	\$193,113
57	Hart County	\$10,456	0
58	Henry County	\$108,088	\$27,093
59	Houston County	\$108,676	\$6,335
60	Jackson County	\$51,812	\$1,738
61	Jasper County (Lead Fiscal Agent for MRCC: Crawford, Jasper, Jones, Twiggs)	\$12,101	\$6,976
62	Jeff Davis County	\$36,539	\$10,939
63	Jones County (MRCC)	(See Jasper)	0
64	Laurens County	\$13,511	\$6,129
65	Lee County	\$12,219	\$13,991
66	Liberty County	\$16,801	\$7,590
67	Long County	\$18,328	\$141
68	Lowndes County	\$27,610	\$4,227
69	Madison County	\$20,088	\$1,620
70	Marietta City	\$183,750	\$22,028
71	Murray County	\$74,017	\$11,877
72	Muscogee County	\$130,176	\$6,417
73	Newton County	\$77,307	\$7,443
74	Oconee County	\$30,077	\$2,367
75	Oglethorpe County	\$11,044	\$3,478
76	Paulding County	\$87,646	\$15,976
77	Peach County	\$20,795	\$3,446
78	Pierce County	\$12,924	\$1,228
79	Polk County	\$68,378	\$22,260
80	Putnam County	\$17,623	\$4,104
81	Rabun County	\$13,511	0
82	Richmond County	\$56,981	\$13,532

	LEA Name	FY20 EL Allocation (July 2019)	FY19 EL Carryover (Jan. 2020)
	TOTAL	\$14,138,076	\$2,675,877
83	Rockdale County	\$79,891	\$12,907
84	Rome City	\$97,162	\$6,374
85	Sumter County	\$27,022	\$9,922
86	Tattnall County	\$27,610	\$924
87	Thomas County	\$11,161	0
88	Tift County	\$60,271	\$7,752
89	Toombs County	\$32,309	\$8,197
90	Troup County	\$43,588	\$6,845
91	Twiggs County (MRCC)	(See Jasper)	0
92	Valdosta City	\$28,314	\$1,903
93	Walton County	\$49,815	\$3,301
94	Ware County	\$13,159	\$743
95	Wayne County	\$19,033	\$1,471
96	Whitfield County	\$238,264	\$62,693
	STATE CHARTER SCHOOL LEAS		
97	Mountain Education Charter HS	\$10,926	0

Three Special LEAs, 31 Charter School LEAs, and 84 traditional City and County School Districts (LEAs) did not receive a Title III, Part A subgrant award in 2019-2020.

Title III, Part A Immigrant Subgrant Awards

The Title III Immigrant subgrant is calculated based on the current year count of immigrant students as reported to the state by LEAs during the October FTE Data Collections count of identified immigrant students, as compared to the average of the previous two years' counts. LEAs must have a minimum of 50 immigrant students to receive an immigrant allocation. Both the "Date Entered U.S. Schools" data element and the "3 Years in U.S. Schools" data element could be used to calculate the Immigrant student population.

- **Title III Sec. 3114(d)(1)** – *"An SEA shall reserve not more than 15% of the Title III allotment to award subgrants to eligible entities in the State that experienced a significant increase, as compared to the average of the two (2) preceding fiscal years, in the percentage or number of immigrant children and youth, who have enrolled, during the fiscal year for which the subgrant is made, in public and nonpublic elementary schools and secondary schools in the geographic areas under the jurisdiction of, or serve by, such entities;..."*
- Georgia defines a "significant increase" in immigrant children and youth as a current number of immigrant students that exceeds the average of the last two years' count by at least 10%.

- Immigrant children and youth are students ages 3-21 who were not born in the United States or Puerto Rico and have been in U.S. schools for less than 3 years. (See [Immigrant Definition & Allocation Rules](#))

In November 2019, Title III, Part A Immigrant subgrant awards were calculated by the GaDOE for eligible LEAs. In December 2019, Title III, Part A Immigrant subgrant awards were approved by the State Board of Education (SBOE) and allocated to qualifying LEAs in December 2019. One hundred percent of FY19 Title III, Part A Immigrant unexpended funds were distributed to LEAs following the submission of FY19 Completion Reports.

Number of LEAs eligible to receive a Title III, Part A Immigrant Subgrant Award	47
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Chart 8: Title III, Part A FY20 Immigrant Subgrant Allocations and FY19 Immigrant Subgrant Carryover Funds by LEA

	LEA Name	FY20 IMM Allocation (July 2019)	FY19 IMM Carryover (Jan. 2020)
	TOTAL	\$744,109	\$230,343
1	Atkinson County	\$1,480	0
2	Barrow County	\$4,338	0
3	Bartow County	\$2,679	0
4	Bibb County	\$4,134	\$3,558
5	Bryan County	\$3,828	0
6	Buford City	\$3,547	\$1,793
7	Calhoun City	\$2,424	0
8	Camden County	\$2,067	0
9	Carroll County	\$2,246	0
10	Carrollton City	\$3,624	0
11	Cartersville City	\$2,628	\$114
12	Catoosa County	\$1,378	0
13	Chatham County	0	\$19
14	Cherokee County	\$27,406	\$2,714
15	Cobb County	\$91,763	\$85,788
16	Coffee County	\$3,292	\$963
17	Colquitt County	\$2,909	0
18	Coweta County	\$7,043	0
19	Dalton City	\$12,376	\$7,698
20	DeKalb County	\$168,828	0
21	Dougherty County	\$1,480	0
22	Douglas County	\$7,120	0
23	Forsyth County	\$34,628	\$28,910

	LEA Name	FY20 IMM Allocation (July 2019)	FY19 IMM Carryover (Jan. 2020)
	TOTAL	\$744,109	\$230,343
24	Gainesville City	\$13,958	0
25	Gilmer County	\$2,628	0
26	Glynn County	\$4,083	0
27	Grady County	\$3,496	\$365
28	Gwinnett County	\$219,762	\$92,708
29	Habersham County	\$5,359	\$454
30	Hall County	\$14,188	0
31	Henry County	\$3,598	0
32	Houston County	\$12,402	\$1,529
33	Jackson County	\$1,378	0
34	Liberty County	\$2,603	0
35	Lowndes County	\$1,304	0
36	Marietta City	\$11,891	0
37	Murray County	\$1,863	0
38	Oconee County	\$3,547	\$336
39	Paulding County	\$4,695	\$1,538
40	Polk County	\$3,879	\$1,013
41	Putnam County	\$1,352	0
42	Rockdale County	0	\$510
43	Rome City	\$5,767	0
44	Sumter County	\$1,327	0
45	Troup County	\$3,751	\$96
46	Valdosta City	\$2,092	\$237
47	Whitfield County	\$2,552	0

Three Special LEAs, 33 Charter School LEAs, and 133 traditional City and County School Districts (LEAs) did not receive a Title III, Part A Immigrant subgrant award nor carryover funds in 2019-2020.

Consolidation of Funds Initiative

The Georgia Department of Education and school districts across Georgia are conducting the Consolidation of Funds Initiative to fully consolidate federal, state, and local funds in specific schools that operate Title I, Part A schoolwide programs. Once these funds are consolidated, the federal funds lose their identity as federal funds, and expenditures of those funds are no longer limited to the federal requirements for individual programs. A schoolwide program school that consolidates federal program funds “is not required to meet most statutory or regulatory requirements of the program applicable at the school level but must meet the intent and purposes of that program to ensure that the needs of the intended beneficiaries are met.”

In the 2019-2020 school year, twelve LEAs participated in the Consolidation of Funds initiative for Title III, Part A. These were: Atkinson, Barrow, Calhoun City, Cartersville City, Dougherty, Echols, Gainesville, Long, Marietta City, Madison, Oglethorpe, and Tattnall. Three LEAs started consolidating funds five years ago in Cohort 1, three LEAs are in Cohort 2, two LEAs were in Cohort 3, three LEAs in Cohort 4, and the 2019-2020 Cohort 5 was the first year for one LEA to consolidate Title III, Part A subgrant funds with other federal, state, and local funds in schoolwide Title I program schools.

Maintenance of Effort

ESSA addresses the LEA’s responsibility to maintain local funding. If a LEA fails to maintain fiscal effort (MOE), the State Education Agency may be required to reduce the current year allocation. Under Sec. 8521 of ESSA, a local educational agency may receive funds under a covered program for any fiscal year only if the Georgia Department of Education (GaDOE) finds that either the combined fiscal effort per student or the aggregate expenditures of the agency and the State with respect to the provision of free public education by the agency for the preceding fiscal year was not less than 90 percent of the combined fiscal effort or aggregate expenditures for the second preceding fiscal year, subject to the requirements of subsection (b) [See Below].

In FY2020, one LEA did not meet MOE. However, the LEA had not failed to meet MOE over the last five years, therefore it met the ESSA MOE requirements as outlined below.

(b) REDUCTION IN CASE OF FAILURE TO MEET — (1) IN GENERAL — The state educational agency shall reduce the amount of the allocation of funds under a covered program in any fiscal year in the exact proportion by which a local educational agency fails to meet the requirement of subsection

(a) of this section by falling below 90 percent of both the combined fiscal effort per student and aggregate expenditures (using the measure most favorable to the local agency) if such local educational agency has also failed to meet such requirement (as determined using the measure most favorable to the local agency) for 1 or more of the 5 immediately preceding fiscal years.

Covered Programs:

- Title I, Part A;
- Title I, Part, D;
- Title II, Part A;
- Title III, Part A;
- Title V, Part B; and
- Title IX, Part A--McKinney-Vento Act.

2019-2020 Private School Participation in Title III, Part A Equitable Services

Private schools who choose to participate in Title III, Part A may select to use their equitable service allocation to provide additional language and/or academic instructional services to eligible English Learners (ELs), EL-focused professional learning to the teachers and administrators who serve the eligible students and/or EL-focused parent and family engagement activities for the parents of English learners. LEAs follow all Federal statute and nonregulatory guidance when collaborating with private school officials during ongoing consultation to determine EL identification processes, EL services, and evaluation of services.

Eight private schools in six LEAs participated in equitable Title III, Part A services during the 2019-2020 school year. (see data on next page)

System Name	Number of Participating Private Schools
Atlanta Public Schools	1
City Schools of Decatur	1
Cobb County	1
Dekalb County	2
Fulton County	1
Gwinnett County	2

2019-2020 LEA Identified Strengths and Challenges of EL Programs

Source: FY20 Consolidated LEA Improvement Plan (CLIP)

In the annual Consolidated LEA Improvement Plan (CLIP), grounded in a process of Continuous Improvement as identified in the Systems of Continuous Improvement framework, LEAs are required to identify strengths and challenges of their Title III, Part A and/or ESOL language programs. In addition, LEAs establish district and/or school level improvement goals based on an analysis and prioritization of system and school needs. Listed below are the strengths and challenges and the number of LEAs who identified them in their FY20 CLIPs.



	LEA Identified EL Program Strengths	Number of LEAs
1	Outstanding ESOL teachers	48
2	EL-focused instructional resources	43
3	EL-focused professional learning	41
4	ELs' progress toward language proficiency as measured by ACCESS	37
5	EL parent communication and participation	24
6	Collegial collaboration (ESOL teachers, content teachers & administrators)	17
7	EL tutoring and summer school programs	14
8	Local ESOL Language Program (non TIIIA-funded LEAs)	14
9	Identification/screening process for ELs (non TIIIA-funded LEAs)	11
10	EL students' academic achievement as compared to non-ELs	7
11	Increased EL student graduation rate	2
12	EL students' performances on state mathematics assessments	1
13	High EL exit rate	1

	LEA Identified EL Program Challenges	Number of LEAs
1	Lack of EL certified/endorsed teachers	50
2	EL students' poor academic and language performance	40
3	Providing EL-focused professional learning opportunities	34
4	Encouraging EL parent engagement	29
5	Scheduling ESOL courses for EL students	27

6	Lack of translation/interpretation services for EL parents	26
7	Gap in EL performance on state assessments as compared to non-ELs	23
8	No Title III funding due to low incidence of ELs and limited funding for EL resources from other funds	13
9	Students with Limited or Interrupted Formal Education (SLIFE)	12
10	English Learner transiency	10
11	EL student performance in state ELA assessments	5
12	Meeting the needs of ELs with disabilities and/or gifted	4
13	Lack of EL-focused funding resources (in non-Title IIIA LEAs)	3
14	Collaboration opportunities between ESOL and gen ed teachers	2
15	The need for ESOL teachers to be content area experts	2
16	Limited technology in students' homes	2
17	Large class size (for ELs in general education classes)	1
18	Matching EL student resources to the needs of ELs	1

2019-2020 LEA Title III, Part A Budgeted Funds

Source: FY20 Cube Financial Review Budgeted Funds

English Learner Budgets

Section 3115(c) REQUIRED SUBGRANTEE ACTIVITIES, states that *“Each eligible entity receiving funds under section 31154(a) shall use the funds – (1) to increase the English proficiency of English learners by providing effective language instruction educational programs that meet the needs of English learners and demonstrate successes in increasing (A) English language proficiency; and (B) student academic achievement.”*

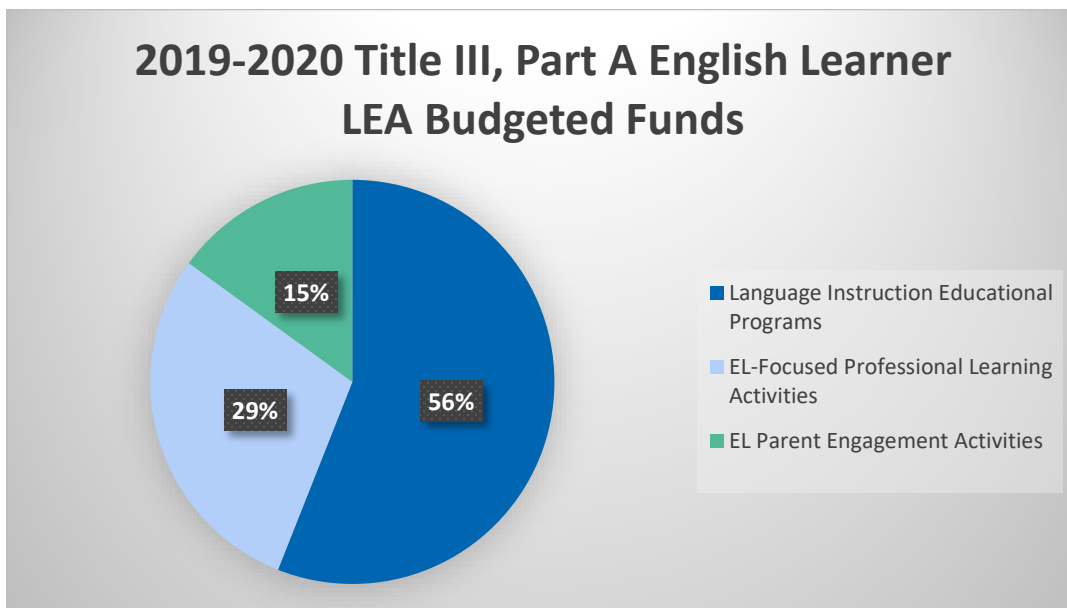
In FY20, 56% of Title III, Part A English Learner subgrant funds were budgeted for language instruction educational programs.

The statute also states that an eligible entity *“shall use the funds (2) to provide effective professional development to classroom teachers (including teachers in classroom settings that are not the settings of language instruction educational programs), principals, and other school leaders, administrators, and other school or community-based organizational personnel, that is (A) designed to improve the instruction and assessment of English learners; (B) designed to enhance the ability of such teachers, principals, and other school leaders to understand and implement curricula, assessment practices and measures, and instructional strategies for English learners; (C) effective in increasing children’s English proficiency or substantially increasing the subject matter knowledge, teaching knowledge, and teaching skills of such teachers; and (D) of*

sufficient intensity and duration (which shall not include activities such as one-day or short-term workshops and conference) to have a positive and lasting impact on the teachers' performance in the classroom," In FY20, **29%** of Title III, Part A English Learner subgrant funds were budgeted for EL-focused professional learning activities.

Finally, the statute states that an eligible entity "shall use the funds (3) to provide and implement other effective activities and strategies that enhance or supplement language instruction educational programs for English learners which (a) shall include parent, family, and community engagement activities; and (B) may include strategies that serve to coordinate and align related programs." In FY20, **15%** of Title III, Part A English Learner subgrant funds were budgeted for EL parent engagement activities.

Eleven (11) LEAs consolidated Title III, Part A English Learner funds with other federal, state, and local funds in schoolwide Title IA programs, so their budgets cannot be traced directly to these three categories of required activities.



Immigrant Budgets

Section 3115(e) ACTIVITIES BY AGENCIES EXPERIENCING SUBSTANTIAL INCREASES IN IMMIGRANT CHILDREN AND YOUTH. – states that “an eligible entity receiving funds under section 3114(d)(1) shall use the funds to pay for activities that provide enhance instructional opportunities for immigrant children and youth, which may include –

(A) family literacy, parent and family outreach, and training activities designed to assist parents and families to become active participants in the education of their children;

(B) recruitment of, and support for personnel, including teachers and paraprofessionals who have been specifically trained, or are being trained, to provide services to immigrant children and youth;

(C) provision of tutorials, mentoring, and academic or career counseling for immigrant children and youth.

(D) identification, development and acquisition of curricular materials, educational software, and technologies to be used in the program carried out with awarded funds.

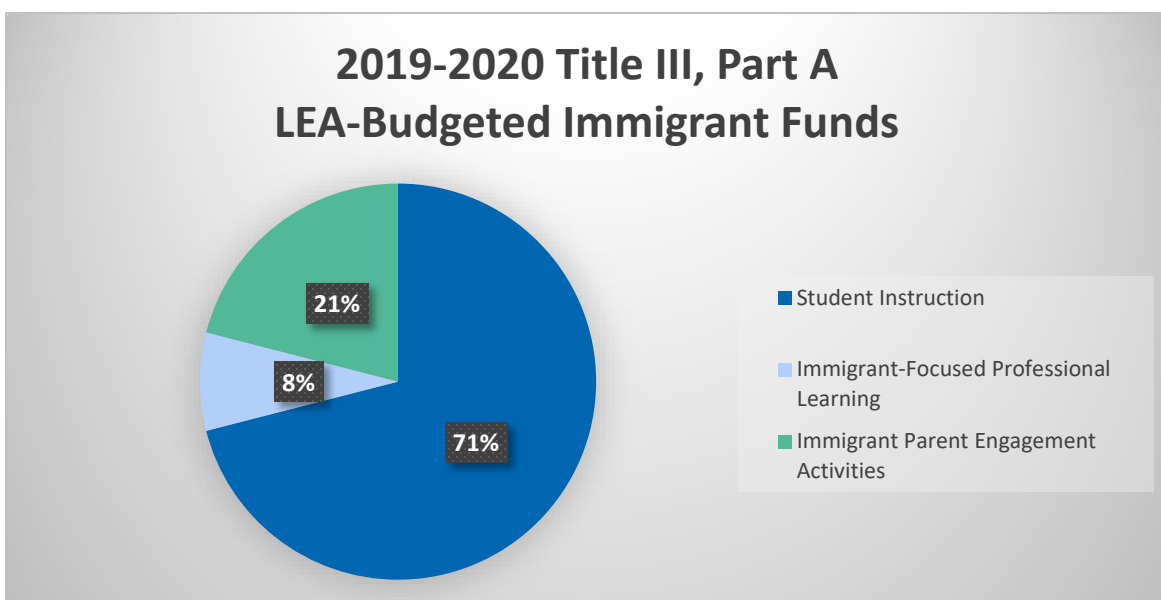
(E) basic instructional services that are directly attributable to the presence of immigrant children and youth in the local educational agency involved, including the payment of costs of providing additional classroom supplies, costs of transportation, or such other costs as are directly attributable to such additional basic instructional services.

(F) other instructional services that are designed to assist immigrant children and youth to achieve in elementary schools and secondary schools in the United States, such as programs of introduction to the educational system and civics education; and

(G) activities, coordinated with community-based organizations, institutions of higher education, private sector entities, or other entities with expertise in working with immigrants, to assist parents and families of immigrant children and youth by offering comprehensive community services.”

In FY20, 71% of Title III, Part A Immigrant subgrant funds were budgeted for student instruction, 8% for immigrant-focused professional learning for teachers and administrators, and 21% for immigrant parent engagement activities.

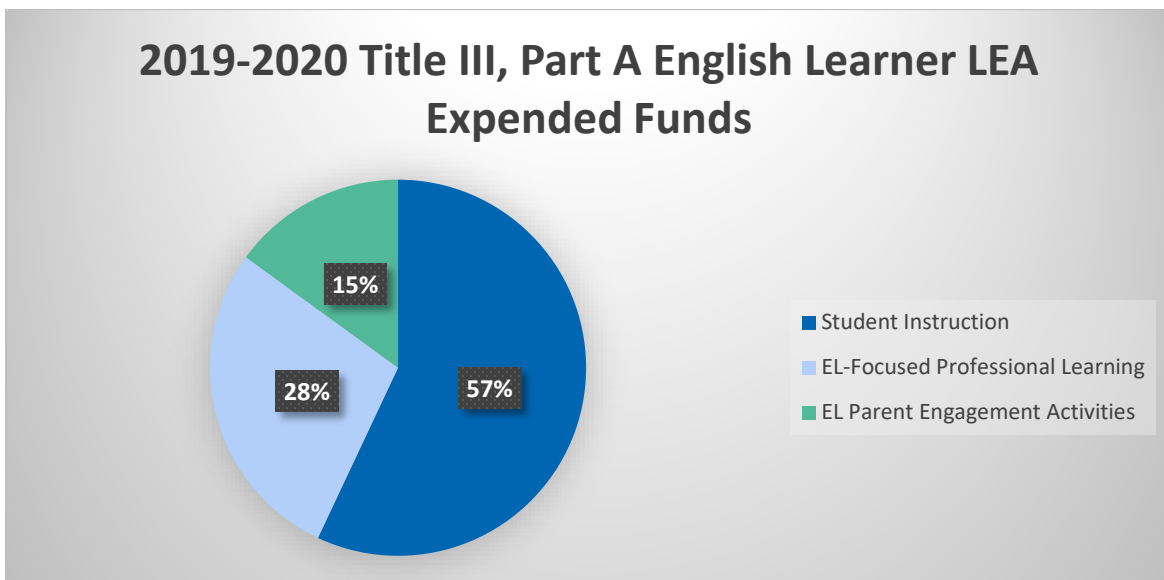
Four (4) LEAs consolidated Title III, Part A Immigrant funds with other federal, state, and local funds in schoolwide Title IA programs, so those budgets cannot be traced directly to these any of these seven categories of possible activities.



2019-2020 LEA Title III, Part A English Learner Program Expenditures

Due to the COVID-19 school closings in March 2020, many LEAs were unable to expend all their budgeted Title III, Part A EL and Immigrant subgrant awards.

In FY20, 57% of the Title III, Part A English Learner (EL) subgrant funds were expended for student instruction, 28% for EL-focused professional learning for teachers and administrators, and 15% for EL parent engagement activities.



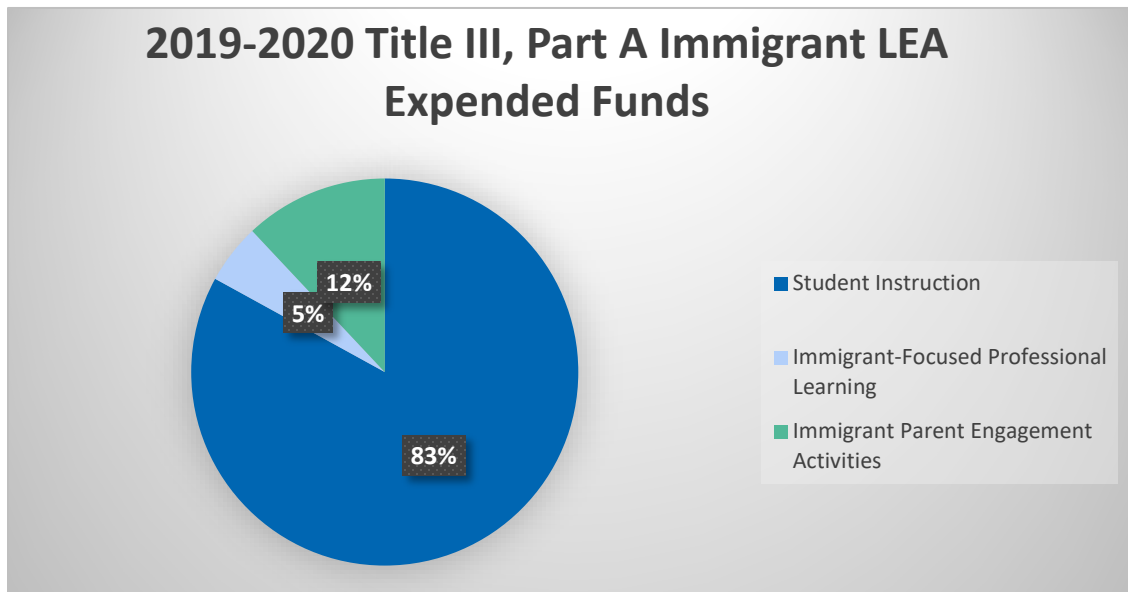
The chart below demonstrates the number of LEAs that expended Title III, Part A English Learner funds in FY20 in each activity category as defined by ED’s ESEA/ESSA Grant Program Consolidated State Program Report (CSPR).

English Learner Grant Prioritized Activities		No. of LEAs
1	Supporting the development and implementation of Language Instruction Education Programs (LIEPs) – Sec. 3115(a)(1) & 3115(c)(1)	50
2	Enhancing existing LIEPs and programs for restructuring and reforming schools with ELs – Sec. 3115(a)(1)	76
3	Improving LIEPs by upgrading curricula, instructional materials, software, and assessment procedures - Sec. 3115(a)(2)	64
4	Professional development to teachers, school leaders, and other personnel serving ELs – Sec. 3115(c)(2)	70
5	EL Parent and community engagement activities that enhance or supplement LIEPs – Sec. 3115(c)(3) & Sec. 3115(d)(6)	38
6	Providing career and technical education for EL students – Sec. 3115(d)(3)(A)	6
7	Supporting implementation of schoolwide programs (COF LEAs) – Sec. 3115(a)(3)	11

8	Supporting the development and implementation of effective pre-school programs – Sec. 3115(d)(4)	0
9	Offering early college high school or dual or concurrent enrollment programs to help EL students achieve success in post-secondary education – Sec. 3115(d)(8)	0
10	Improving instruction of ELs with disabilities by providing educational technology, instructional materials, access to networks for materials, training, and communication, and incorporation of resources into curricula and programs. – Sec. 3115(d)(7)	0

2019-2020 LEA Title III, Part A Immigrant Program Expenditures

In FY20, 83% of Title III, Part A Immigrant subgrant funds were expended for student instruction, 5% for immigrant-focused professional learning for teachers and administrators, and 12% for immigrant parent engagement activities.



The chart below demonstrates the number of LEAs that expended Title III, Part A Immigrant funds in each activity category as described in Section 3115(e).

	Grant Prioritized Activities – Sec. 3115(e)(1)(A-G)	# of LEAs
A	Family literacy, parent/family outreach, and training activities designed to assist parents and families to become active participants in the education of their children	11
B	Recruitment of and support for personnel who have been specifically trained or are being trained to provide services to immigrant children	8

C	Tutorials, mentoring, academic or career counseling	10
D	Identification, development and acquisition of curricular materials, educational software, and technologies	9
E	Basic instructional services directly attributable to the presence of immigrant children...additional classroom supplies, transportation, etc.	21
F	Instructional programs of introduction to the educational system and civics education	6
G	Activities coordinated with community-based organizations, institutions of higher education, private sector, or entities with expertise in working with immigrants to assist parents and families of immigrant children by offering comprehensive community services.	0

2019-2020 State & LEA English Learner Assessment Data

Reporting Requirements under ESEA/ESSA

Under the **ESSA, Section 3121 REPORTING (a) IN GENERAL.** – *“Each eligible entity that receives a subgrant from a State educational agency under subpart 1 shall provide such agency, at the conclusion of every second fiscal year during which the subgrant is received, with a report, in a form prescribe by the agency, on the activities conducted and children served under such subpart that includes –*

(1) “a description of the programs and activities conducted by the entity with the funds received under subpart 1 during the 2 immediately preceding fiscal years, which shall include a description of how such programs and activities supplemented programs funded primarily with State or local funds;

(2)” the number and percentage of English learners in the programs and activities who are making progress toward achieving English language proficiency, as described in section 1111(c)(4)(A)(ii), in the aggregate and disaggregated, at the minimum, by English learners with a disability.

To meet Section 3121(a)(2), the state’s accountability system includes an indicator called *Progress Towards English Language Proficiency*. This indicator measures the extent to which English Learners (EL) are making progress towards English language proficiency, as measured by EL students’ level of English proficiency on the ACCESS for ELLs moving from one state-defined Performance Band to a higher Performance Band on the state’s Accountability College and Career Ready Performance Index (CCRPI). The State’s CCRPI assigns points to schools in the ELP Progress indicator, which is converted to a score. The following charts show ELP Progress Scores for the state at each school level in 2019-2020 according to CCRPI data.

2019-2020 ELs' Progress towards English Proficiency

Source: GaDOE CCRPI 2020 Progress Scores, Targets, and Flags by Subgroup, 11.17.2020

State 2020 EL Progress Towards Proficiency	
Grades K-5	100.00
Grades 6-8	52.78
Grades 9-12	65.86

2019-2020 Number of LEAs by ELP Progress Score by Grade Level Cluster

Source: GaDOE Accountability 2020 Progress Scores, Targets, and Flags by Subgroup, 11.17.2020

ELP Progress Score	Number of LEAs		
	Grades K-5	Grades 6-8	Grades 9-12
100	88	0	0
90 – 99	30	0	3
80 – 89	8	1	2
70 – 79	9	3	14
60 – 69	4	13	26
50 – 59	0	22	14
40 – 49	0	22	6
30 - 39	0	11	5
20 - 29	0	6	1
10 - 19	0	0	0
1 - 9	0	1	0
Too Few Students	48	85	93
N/A	30	48	51
Total Number of LEAs	217	212	215

(3) “the number and percentage of ELs attaining English Language Proficiency based on state English language proficiency standards established under section 1111(b)(1)(F) by the end of each school year, as determined by the state’s English proficiency assessment under section 1111(b)(2)(G).

(4) “the number and percentage of English learners who exit the language instruction educational programs based on their attainment of English language proficiency;

The charts on the next pages show the state and LEAs’ EL Exit Rates (when EL students have reached full English proficiency) and EL students’ progress toward academic achievement in 2019-2020.

2019-2020 SEA & LEA EL Exit Rates

Source: GOSA Downloadable Data 2020 SEA & LEA EL Exit Rate Report

State 2020 EL Exit Rate = 9.3%	
LEA EL Exit Rates Compared to State EL Exit Rate	Number of LEAs (167 with ELs)
EL Exit Rates \geq 9.3%	69
EL Exit Rates < 9.3%	98
Total LEAs with EL Students	167*

*Not all LEAs in Georgia have English learners

(5) “the number and percentage of English learners meeting challenging State academic standards for each of the 4 years after such children are no longer receiving services under this part, in the aggregate and disaggregated, at a minimum, by English learners with a disability.

2019-2020 EL Student Academic Achievement

State Content Assessments	Number of LEAs
Number of ELs scoring proficient on state English Language Arts (ELA) assessment	Due to the USED waiver of state assessments granted to Georgia, the state assessment was not administered in FY20.
Number of ELs scoring proficient on state mathematics assessment	Due to the USED waiver of state assessments granted to Georgia, the state assessment was not administered in FY20.

(6) “the number and percentage of English learners who have not attained English language proficiency within 5 years of initial classification as an English learner and first enrollment in the local educational agency; and

(7) “any other information that the State educational agency may require.”

2019-2020 LEA English Learner Graduation Rates

Source: GaDOE Accountability 2020 Graduation Rate Scores, Targets, and Flags by Subgroup 11.30.20

Graduation Rate	4 Yr. Graduation Rate Number of LEAs	5 Yr. Graduation Rate Number of LEAs
100%	1	1
90 – 90%	4	2
80 – 89%	7	12
70 – 79%	16	14
60 – 69%	12	12
50 – 59%	9	5
40 – 49%	2	0
30 - 39%	0	1
20 - 29%	0	0
10 - 19	0	2
0 - 9	3	0
Too Few Students	100	100
No Data	37	42
Total Number of LEAs	191	191

These biennial LEA reports to the state will be used by the LEA and the SEA for improvement of Title III, Part A funded programs and activities.

In addition, Section 3113 (b)(3)(B) says the State plan will provide an assurance that the *“agency will ensure that eligible entities receiving a subgrant under this subpart annually assess the English proficiency of all English learners participating in a program funded under this subpart, consistent with section 1111(b)(2)(G); (See pp. 14-15 for the ELP Assessment Participation Rate Reports.)*

2019-2020 LEA Self-Reported Effectiveness of Title III, Part A Funded Activities

Source: LEA FY20 budgets and FY20 monitoring documentation

In FY20, all 97 Title III, Part A recipient LEAs indicated that the language instruction educational programs (LIEP) they provided to EL students, the EL-focused professional learning (PL) opportunities they offered teachers and school leaders, and parent and family engagement (PFE) activities were effective at the promising, moderate, strong or rationale (logic model) levels. During the 2019-2020 cross-functional monitoring process, 30 of 33 monitored LEAs provided documentation for the effectiveness of their Title III, Part A funded activities.

2019-2020 Use of Title III, Part A Subgrant Award Funds - LEA Flexibility

Source: FY20 Title III, Part A Budgets

According to Title III, Part A nonregulatory guidance (September 2016), section A-11, “An LEA may consolidate its Title III funds in a schoolwide program pursuant to the requirements of Section 1114(a) of the ESEA. Under that Section, the LEA is not required to maintain separate fiscal accounting records by program if it maintains records that demonstrate that the schoolwide program, considered as a whole, addresses the intent and purpose of each Federal program from which it consolidates funds.”

The opportunity to exercise federal funding flexibility is offered on an LEA-basis to Title I-A schools as selected by the district. Once the funds are consolidated, they lose their identity as federal funds, and expenditures of those funds are no longer limited to the federal requirements for individual programs.

In FY 20, a total of 11 LEAs chose to consolidate their English Learner Title III, Part A funds into Fund 150 by participating in the Consolidation of Funds initiative. Four (4) LEAs chose to consolidate their Immigrant Title III, Part A funds. Each school receiving Title IIIA funds from the district is not required to address each of the three core areas (Supplemental LIEP, EL Focused PD and EL Parent Engagement). However, the district is responsible for ensuring that all three areas are being addressed through both district and school initiatives. Therefore, it is possible that a school could submit the Intent and Purpose form that only addresses one area, but the district collectively is meeting the intent and purpose.

2019-2020 Title III, Part A Monitoring Processes

As the state pass-through entity, GaDOE is responsible for overseeing the successful implementation of Title III, Part A programs in LEAs (including LEA provision of equitable services). Section 3113(b)(3)(F) states the SEA must provide an assurance in its state plan that it will “monitor each eligible entity receiving a subgrant under this subpart for compliance with applicable Federal fiscal requirements.” According to the Uniform Grants Guidance (2 CFR 200.328), monitoring by the non-federal entity must cover each program, function, or activity.

LEAs are monitored on a four-year cycle; therefore, approximately one-fourth of the LEAs are monitored each year. As part of the annual review process in determining which LEAs are to be monitored, the Division of Federal Programs conducts a risk assessment using a combination of elements defined by GaDOE. An LEA’s risk assessment rating is determined by using both its risk rating, based on a set of established High-Risk elements developed by the Division of Federal Programs and a risk rating from GaDOE’s Financial Review Division. For FY20, 20 of 218 LEAs were identified as high risk based on their FY19 actions but none of them received this ranking for their Title III, Part A Program.

During the summer of each year, the Division of Federal Programs completes a risk assessment to determine if an LEA falls into the high-risk category. The results of the risk assessment determine which LEAs may be added to the regular CFM cycle for that year. The SEA has the responsibility to monitor high-risk LEAs (§ 200.331(b)(1-4)). The Division of Federal Programs defines high-risk as:

- LEAs showing evidence of serious or chronic compliance problems.
- LEAs with financial monitoring/audit findings; and/or LEAs with a high number of complaints from parents and other stakeholders about program implementation.
- Other elements that may cause an LEA to be determined high-risk include size of allocation and new federal programs or fiscal management personnel in the LEA.
- High-risk does not necessarily mean an LEA is not meeting the requirements of the program, federal regulations, or administrative procedures. It does mean that an LEA may be at a higher risk of having program elements that could cause it to not meet requirements associated with federal rules, regulations, and administrative procedures.

2019-2020 Title III, Part A Cross-functional Monitoring (CFM) Results

GaDOE monitors LEAs’ federal programs implementation on a 4-year cycle and includes LEAs who are identified as High Risk according to the annual risk assessment. Due to a global pandemic, the FY20 monitoring schedule was interrupted because the Georgia Governor issued an executive order to close schools in March 2020.

Cross-functional Monitoring Schedule	Number of LEAs
January-May 2020	15
September-November 2020	18
Total LEAs	33

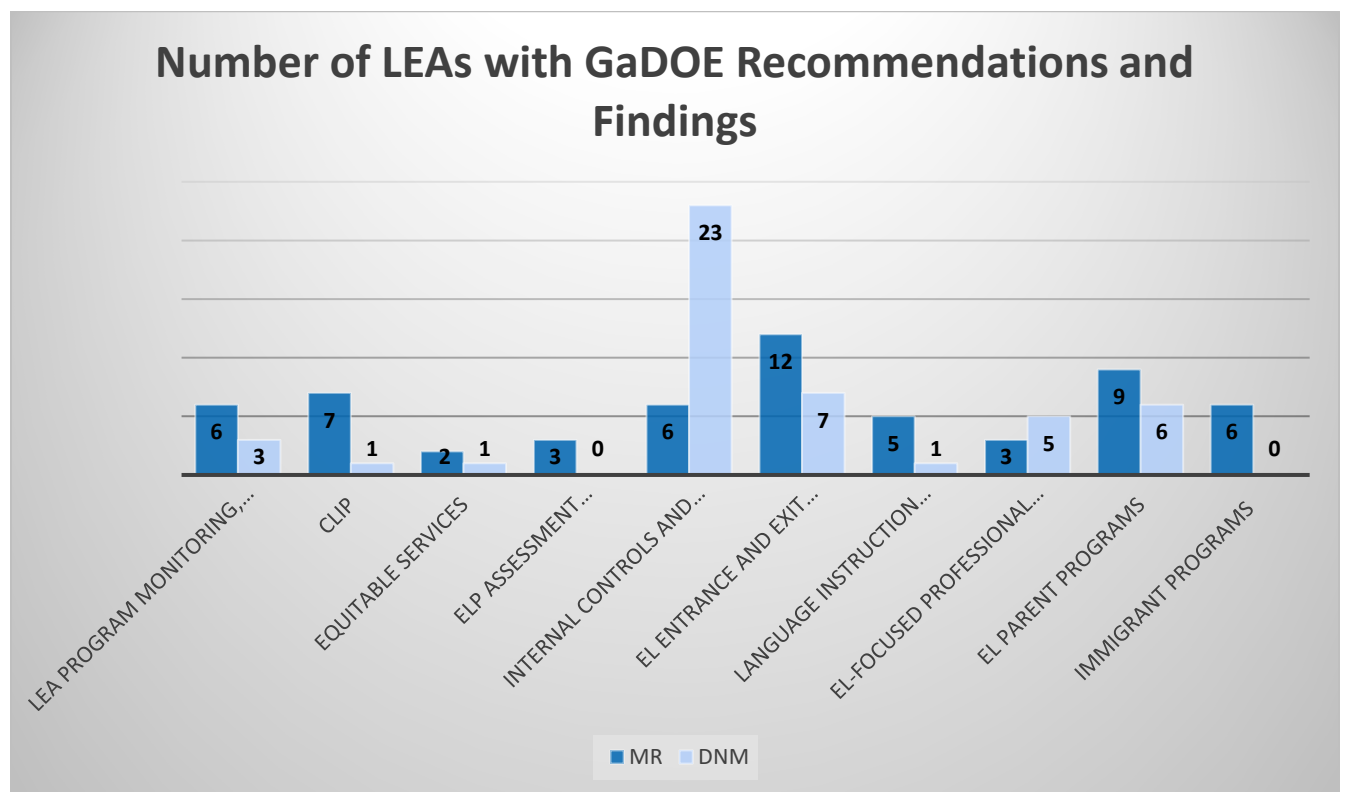
In the 2019-2020 monitoring cycle, ten Indicators were monitored as outlined on the *Federal Programs Cross-Functional Monitoring Document*. Five indicators were overarching with other federal programs: (1) LEA program monitoring, program implementation, and program effectiveness; (2) CLIP (stakeholders and evidence-based practices; (3) equitable services; (4) ELP Assessment Participation Rate; (5) internal controls and expenditures, inventory, and drawdowns. Five indicators were specific to Title III, Part A: EL Entrance and Exit Procedures, Language Instruction Educational Programs, EL-focused Professional Learning Programs, EL Parent Programs, and Immigrant Programs (when applicable).

The FY20 Cross-functional Monitoring (CFM) results for Title III, Part A were varied, although a little less than half of the LEAs received some recommendations and findings. For instance, out of the 33 LEAs that were monitored two met all the Title III, Part A

monitoring indicators, twelve met most of them but had a few recommendations, four LEAs met most of the indicators but had a few findings, and fifteen LEAs met some, received some recommendations, and did not meet some indicators.

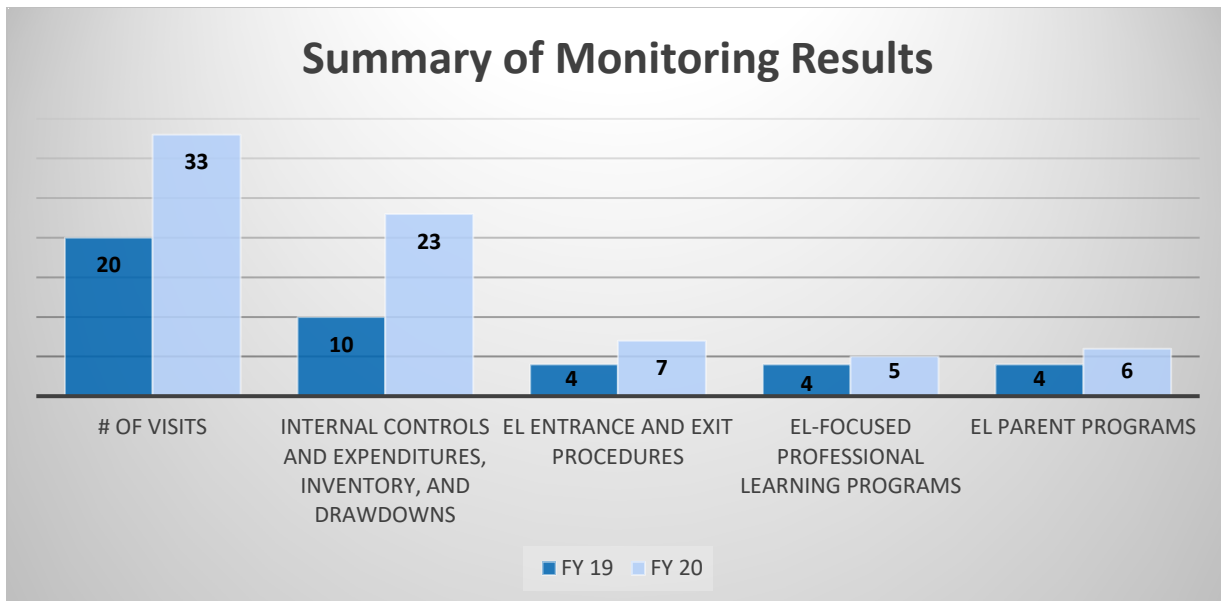
The most common indicators where LEAs did not meet statutory and state expectations were expenditures that did not comply with the supplement, not supplant, clause in Title III, Part A. Common errors were also found in LEAs' written and implemented internal controls and a lack of supporting documentation as evidence of compliance with statute and applicable regulations. The chart below shows the number of LEAs receiving recommendations and findings by CFM indicator.

Chart 10: Number of LEAs Receiving Recommendations and Findings by CFM



Indicator*MR = Met with Recommendations
 **DNM = Did Not Meet Indicator Requirements

Two Year Summary of Title III, Part A Monitoring Finding Indicators



Analysis

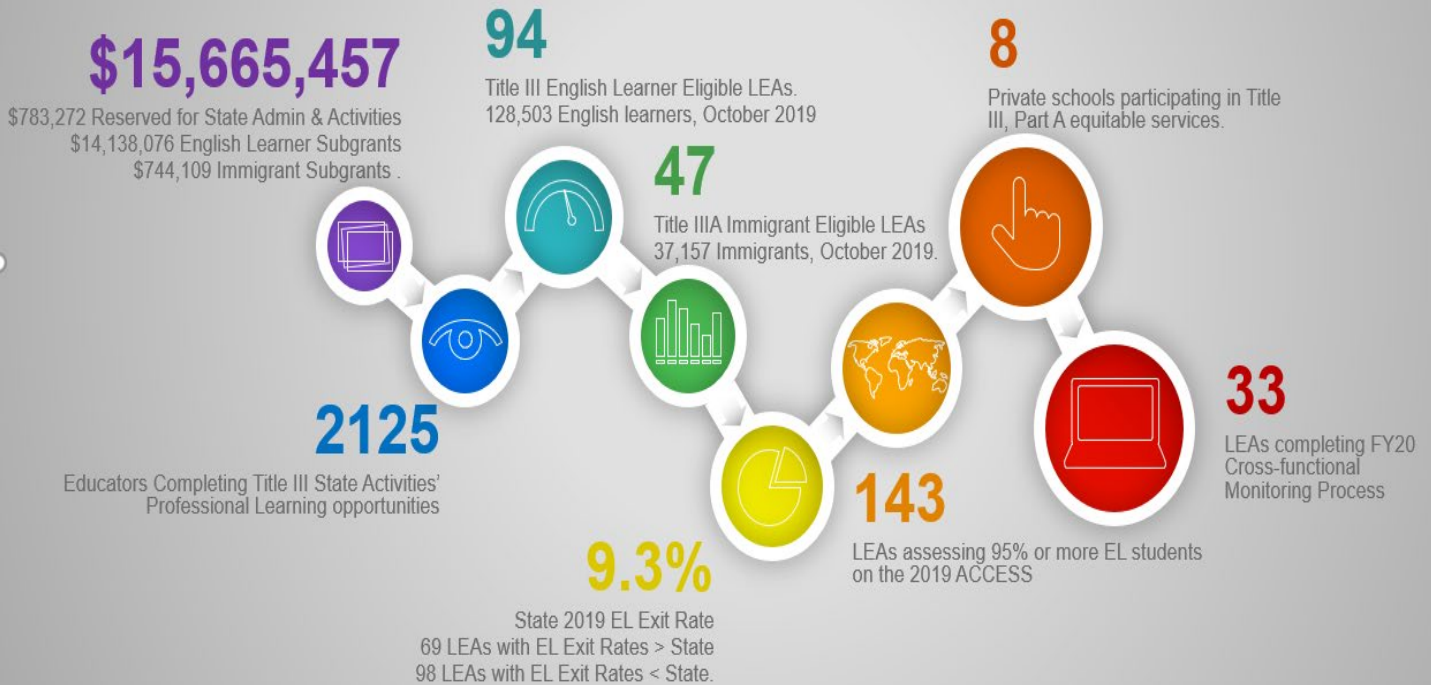
The high number of findings in the internal controls and expenditures, inventory, and drawdowns category indicates a lack of alignment between the approved budget and purchases and a misunderstanding of the requirements for maintenance of inventory records. It could be that LEAs confuse the state funded ESOL language program, which does not have Federal requirements for expenditures and equipment inventory, with the Federal Title III, Part A program that is regulated by statutory and fiscal obligations. Many LEAs allow ESOL Coordinators to manage the Title III, Part A program, as well, which tends to blur the requirements across state and federal programs.

2019-2020 Title III, Part A Audit Resolutions/ Financial Reviews Completed

In 2019-2020, there were no Title III, Part A Audit resolutions for LEAs.

FY20 Numerical Summary: Title III, Part A

Language Instruction for English Learners and Immigrant Students



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