



# Frequently Asked Questions

## Title I, Part A and Title III, Part A Parent, Family, & Community Engagement to Support English Learners (ELs)

### 1. Can districts continue to fund a parent engagement coordinator/specialist/etc. from Title III? Above and beyond Title I/all parents, specific to the Title III-served EL population?

Title III-funded parent, family and community engagement activities must be supplemental to those required under state, Office for Civil Rights or Title I law and, to adhere to new Title III requirements, they must “enhance or supplement” the LEA’s Title III-funded language instructional program. As for general allowability however, in Title III, Section 3115(d)(6) of the Every Student Succeeds Act (ESSA), the activities provided for in EL outreach programs are:

Providing **community participation** programs, providing **family literacy services**, and **providing parent and family outreach and training activities** to English learners and their families for the purpose of improving EL students’ English skill and assisting parents and families in becoming active participants in their children’s education.

Thus, to be funded under Title III, the parent engagement staff responsibilities must be one or more of the allowable activities, which themselves must clearly align with the above-stated purpose of Title III outreach, *and* be above and beyond that which districts are responsible for under Title I law, Sec. 1112(e)(3)(C).

### 2. How does this affect funding for translations/interpretations?

The answer to this depends on how your district funds translation and interpretation services. Local or state funds must be used to pay for translations of documents that are provided to all non-EL parents (field trip forms, report cards, discipline handbooks, transportation information, etc.) Similarly, oral communications with the general parent population (parent-teacher conferences, non-Title program related school meetings, academic counseling, ‘robo-calls’, etc.) must be interpreted for EL parents using local funding.

Title I funds for translations/interpretations for EL students are still limited to Title I sponsored/required activities. A Title I parent engagement activity, a Title I Newsletter, Title I required notifications, Annual Title I Meeting, and so on can be translated/interpreted using Title I funds at Title I Schools. Required state/school parent/teacher conferences, IEP meetings, OCR notifications, student/discipline handbooks, and any other documents/meetings are the responsibility of the LEA and must be paid for with state/local funds. If a district decides to



implement “Title I – like” activities/handouts at non-Title I schools, the translation/interpretation will become the responsibility of the LEA and thus require use of local funding sources.

Title III funds may only be used to pay for the translation and interpretation of Title III-required documents, meetings or activities. Under the ESSA, Title III no longer has any required documents to be disseminated to, or meetings that must be held for, EL parents. [These are now in Title I law, Sec. 1112(e)(3)(C).] Title III funds may be used, however, to translate/interpret and disseminate information about a district’s approved Title III outreach activities, as noted in question 1.

**3. Can districts continue to fund adult literacy/English classes from T3 funds?**

If districts offered these courses under the Parental Participation requirements of NCLB, Section 3302(e), those requirements have now moved to Title I law, Sec. 1112(e)(3)(C) and continuing those classes under the ESSA should be a joint decision made between LEA Title III and Title I staff. Title I, Part A, Section 1116(e)(7) of ESSA states that LEAs and Title I schools “may provide necessary literacy training from funds if the LEA has exhausted all other reasonably available sources of funding for such training.” Title I funds can support adult literacy classes if identified as a need in the school/district CNA. However, if classes are designed to lead to a GED type diploma, Title I cannot pay for the actual exam, as Title I funds can only lead to a regular school diploma. However, once Title I fulfills their new Parental Notification and Participation Requirements under the ESSA, Title III funds may support outreach activities held for the goal and purposes listed in question 1.

**4. Will the parent and family engagement component of monitoring change?**

The Georgia Department of Education (GaDOE) team who monitors compliance of parent and family engagement requirements of Title I, Part A, focuses on Section 1116. Beginning in the 2017-2018 school year, the GaDOE team will review documentation for Title I, Part A, Section 1112(e)(3)(A) in addition to Section 1116. Section 1112(e)(3)(A) requires LEAs to notify parents of ELs the reasons for identification of their child as qualifying for placement in a Title-funded supplemental language instruction educational program as well as other specific requirements.

**5. How will cross-functional monitoring change for FY18?**

Cross-functional monitoring will change to address the requirements of ESSA. While both programs collaborate together for program implementation, the requirement will be monitored within the program where the statute resides.

**6. Who is now responsible for communication and engagement with parents of ELs?**

Both Title I and Title III have responsibilities for communicating and/or engaging with parents of ELs. [See Title I, Part A, Sec. 1112(e)(3)(C); Title I, Part A, Sec. 1112(e)(3)(A), Part A, Sec. 1112(e)(3)(B), Part A, Sec. 1112(e)(4), Title I, Part A, Sec. 1116, and Title III, Part A, Sec. 3115(c)(3)(A)].

**7. What would this communication and engagement plan involve? How does this impact parents of ELs in non-Title I schools?**

Parent, Family and Community Engagement

As part of an LEA’s requirement under Title III, Part A, Sec. 3115(c)(3)(A), the LEA must include (allowable) supplemental engagement activities for parents/families of ELs. Thus, if Title III funds are being used for engagement activities in a Title I school, district administrators are



required to ensure the Title III engagement activities do not supplant those required by Title I. This would not be a concern in a non-Title I school.

#### Communication

Title I, Part A, Sec. 1112(e)(3)(A) requires *an LEA* to disseminate a Title I-compliant letter that notifies parents if their EL student is being offered federally-funded supplemental language services. Thus, if Title I or Title III funds are intended to be used to supplement an EL's ESOL program, the LEA is responsible for ensuring that the EL's parent is provided a letter informing them of this supplemental offering. This letter, among other things, offers the parent the choice to allow or refuse the title-funded service.

As this is an LEA-level requirement, it must be fulfilled by all LEAs in receipt of Title I or Title III funds that puts *either* of these funds to use in supporting a student's supplemental language instructional program. It is not a school-level requirement and thus a school's status as Title I or non-Title I is not relevant in deciding whether or not this notification letter must be sent. *Parents of EL students who are **not** provided supplemental language support through Title I or Title III should not be sent this letter advising them of their child being offered federally-funded supplemental language services.*

However, since Title I funds cannot serve Non-Title I School students, any cost for the dissemination of these letters in **non-Title I** schools must be borne by either Title III or local funding sources. The GaDOE will monitor for compliance with its requirement that **any** parent whose student is offered Title-funded language support has been provided the appropriate notification (whether or not his/her school is a Title I school), but Title I funds should not be used to fulfill this requirement at non-Title I schools.

**8. How should Title I, Part A and Title III, Part A collaborate within the Georgia's Systems of Continuous Improvement framework and completion of the district and school comprehensive needs assessment (CNA) and the district and school improvement plan?**

As with all Federal programs, coordination for service delivery is important. LEA staff working with Title I, Part A and Title III, Part A should have consistent, on-going collaboration procedures in place for working within the Georgia's Systems of Continuous Improvement framework. This will help streamline offerings, maximize use of resources and assure compliance with all programs' expenditure rules.