

## Frequently Asked Questions about Title III, Part A Budgets

**Note:** The questions and answers provided in this FAQ are based on the available information as of the date below. As new information is available or GaDOE procedures are revised, this FAQ will be updated.

### General Budget Questions

Question	Answer
Where is the <b>Title III, Part A Self-Evaluation Report</b> that used to be due <b>June 1</b> ?	The former Self-Assessment Report (SAR) no longer exists as a separate document to submit but is now embedded in the Cross-functional Monitoring (CFM) process and an annual survey is sent to LEAs to report Title IIIA activities implemented each year. Data from this survey is submitted to USED.
What should the Title III Director do regarding the completion report if the finance office is responsible for completing and submitting it?	It is recommended that the LEA director review all the current year's Title III (and immigrant, if applicable) expenditures in September and compare them to the most recently approved budget. If the program spent more than what was approved in any function/object code, then the director must submit a budget amendment, prior to September 30, to reflect the additional expenditures. For Title III, the program should not expend more than the approved budget in any Function or Object code on the completion report.
What is meant by "Supplement not Supplant" in Title III, Part A?	Title III requires that funds available under a subgrant be used to supplement the level of federal, state, and local public funds that, in the absence of such availability, would have been expended for programs for English learners (ELs) and immigrant students and in no case supplant such federal, state, and local public funds. For example, if an activity last year was paid with non-federal funds, the same activity this year cannot be paid with federal funds. LEA's legal obligations to English learners must be paid with state/local funds, such as screening, serving, and testing EL students. In Title IIIA, supplement means "in addition to" ESOL; supplant means to fund something state/local/other federal funds should be funding. <b>Please see Title III, Part A Sec. 3115(g).</b>
What should be included in the description for each budget line item to ensure cost principles (allowable, allocable, reasonable, necessary) are met?	Include as much detail as possible to demonstrate that the cost is necessary to implement the program that meets the grant purpose, reasonable when compared to similar expenditures, allocable to a fund, and allowable under federal statute. <b>Please see the Title III Budget Guiding Questions and Checklist for more details.</b>



## Questions about Effectiveness

Question	Answer
How do we evaluate the effectiveness of our Title III funded activities if we had planned to use the 2020 EOC/EOG results as evidence of effectiveness in our Logic Model?	An LEA should determine if the LEA has benchmark data or progress monitoring data that could be used to evaluate the effectiveness of a program. Pre-and Post-data could also be used. Logic Models can be revised or amended to reflect current data sources. <b>Please see the <i>GaDOE Federal Programs' Handbook</i>.</b>
Must an LEA provide evidence of learning from teachers before paying them stipends for Professional Development (PD)?	Yes, as in Title II, Part A, and as established in state law, before a stipend is paid for PD, the staff member must demonstrate that he/she learned what was taught in the PD. This might be in the form of a submission of a product created as part of the PD to the LEA Title III Director or by documented classroom observation(s). <b>Please see the <i>Georgia State Board of Education Rule 160-3-3-.04</i>.</b>
How do you recommend that we measure the effectiveness of the Title III professional development plan?	Since an LEA's Title III PD plan often contains different activities or elements (PD provided by outside vendors, PD provided by master EL teachers within the district to other teachers and administrators, book studies, etc.), the LEA may want to consider measuring the effectiveness of the overall EL PD plan via a Logic Model. <b>Please see the <i>GaDOE Federal Programs' Handbook</i>.</b>
Must an LEA only purchase resources with Title IIIA funds that have a demonstrated evidence of effectiveness (evidence base) for increasing ELs English language proficiency?	Title III, Part A requires that LEAs receiving these funds use the funds to provide effective language instruction programs, effective professional development, and other effective activities that include parent, family, and community engagement. The effectiveness of the Title IIIA program is monitored during the CFM process, which has been postponed until FY2022. <b>Please see the <i>GaDOE Federal Programs' Handbook</i>.</b>

## Specific Allowability Questions

Question	Answer
Can Title III funds pay for a teacher to get ESOL endorsed or certified?	Yes, however, also check with Title IIA as that grant can also be used to fund endorsements.
Are we able to fund the WIDA Workshops through the Title III grant provided we budgeted for PL for teachers?	Yes, Title III, Part A funds may be used to purchase WIDA Workshops for all teachers of English learners. Please also be sure to make use of the free WIDA PD offered by the state. <b><u>GaDOE EL Language Programs Professional Learning Opportunities</u></b>

May we purchase basic supplies, such as pens, pencils, paper, folders, etc. for the ESOL students?	Instructional supplies may be purchased for a Title III supplemental program. <b>Please see Title III, Part A Sec. 3115(g).</b>
Is it allowable to use Title III funds to pay for administrative costs?	Yes, although only 2% of the subgrant may be used on administrative costs. <b>Please see Title III, Part A Sec. 3115(b).</b>
Can we fund the same type of activities with both the Title IIIA English learner and the Immigrant grant funds, i.e.co-mingle the two grant funds?	When planning an EL and an Immigrant program, the LEA must consider the purpose for which these funds were allocated. The activities must align with the purpose. If some immigrant students are also English learners, then the LEA could use some immigrant funds to fund EL-type activities. This would be considered co-mingling and should reflect the percentage of immigrants who are ELs. <b>Please see Title III, Part A Sec. 3115(e).</b>
Can we use Title IIIA & Migrant funds to split fund a middle school paraprofessional?	Consider the following questions: <ul style="list-style-type: none"> <li>• What does the job description say the paraprofessional will be doing?</li> <li>• Will it be before/after/Saturday/summer schoolwork or during schoolwork?</li> <li>• Are any of the migrant students also English learners?</li> <li>• What is the percentage of migrant to EL students? Is this percentage reflected in the split position?</li> <li>• What would the paraprofessional's purpose be? How would it meet the purpose of the subgrants?</li> </ul>
For the coming year, XXX School wants to provide professional learning for their ESOL teachers. They would also provide the same training to other teachers (non-ESOL). Title I is paying for the non-ESOL teachers' professional learning. Can Title III be used for the ESOL teacher in terms of "supplement not supplant"?	Since Title I funds will pay for the non-ESOL teachers' PL, Title I would also need to fund the ESOL teachers' PL. Using Title III funds in this scenario would constitute supplanting.  <b>Please see Title III, Part A Sec. 3115(g).</b>  <b>Please see the <i>Non-Regulatory Guidance: English Learners and Title III of the Elementary and Secondary Education Act (ESEA), as amended by the Every Student Succeeds Act (ESSA)</i>.</b>
We are looking at the possibility of our Title III Coordinator attending the National ESEA Conference (formally the National Title I Conference) in XXXX; we just realized that the conference had expanded beyond Title I to cover other Federal Programs (including Title III). Would registration and travel be allowable as Title III expenses?	Title III could fund a <i>portion</i> of the Title IIIA Coordinator's registration and travel expenses for the National ESEA Conference, since only a portion of the conference addresses Title III topics. The LEA should consider the reasonable and necessary nature of this conference expenditure for a Title III program director.
Our district had a <i>Feliz Navidad</i> celebration for our EL Family Night. 100 EL parents attended. One of our activities was painting	Title IIIA funds must be used to <b>enhance or supplement</b> the LEA's <i>language instructional educational programs</i> and help build the parents' capacity to help their child <i>learn</i>

<p>Christmas ornaments. May the LEA use Title III funds to pay for the paint and ornaments? The LEA has \$100 for 2100-610 in the budget for these items.</p>	<p><i>English</i> and meet state standards, and/or help the parents learn English.</p> <p><b>Please see <i>Title III, Part A Sec. 3115(c)(3) and 3115(d)(6)</i>.</b></p>
<p>May we purchase the following supplies for Parent and Family Engagement (copy paper, printer ink) to provide newsletters to parents of EL students to support our EL Extended Day tutoring program and instruction through supplemental instructional resources and software?</p>	<p>The activity that described would qualify as supplementing or enhancing the language instruction educational program and fulfilling the purposes of Title IIIA.</p> <p><b>Please see <i>Title III, Part A Sec. 3115(c)(3) and 3115(d)(6)</i>.</b></p>