



Next Session: Title III, Part A

FY20 FAIN: S365A190010



Purposes of Title III, Part A

ESEA/ESSA, Sec. 3115(a)

1. Developing & implementing **new** language instruction educational programs (LIEPs) and academic content instructional programs (ACIPs) for English learners and immigrant children and youth.
2. Carrying out highly focused, innovative, locally designed activities to **expand or enhance** existing LIEPs and ACIPs for English learners and immigrant children and youth.

Purposes of Title III, Part A (cont.)

ESEA/ESSA, Sec. 3115(a)

3. Implementing...**schoolwide** programs for **restructuring, reforming, and upgrading** all relevant programs, activities, and operations relating to LIEPs and ACIPs for English learners and immigrant children and youth.
4. Implementing...**LEA-wide** programs for **restructuring, reforming, and upgrading** all relevant programs, activities, and operations relating to LIEPs and ACIPs for English learners and immigrant children and youth.

How was the FY20 LEA Title III, Part A EL subgrant calculated?

EL portion of USDE Title III SEA grant is divided by the total EL student population in Georgia (public + private) as of March 2019.

FY20
English
Learner Per
Pupil
Allocation =
\$114.81

Number of EL students in each LEA is multiplied by the PPA to see which LEAs meet the \$10,000 minimum Title III subgrant

89 EL students are needed to earn the minimum \$10,000 Title III subgrant.

Step 1: Understand the Title III Assurances the LEA is agreeing to...

The LEA assures compliance with standardized, statewide EL entrance and exit procedures and screens all students who may be English learners within 30 days of enrollment. [Sec. 3113(b)(2)]

The LEA assures compliance with Sec. 1112(e) (Parent's Right-To-Know) prior to, and throughout, each school year as of the date of application [Sec. 3116(b)(4)(A)]

The LEA assures that it is not in violation of any State Law, including State constitutional law, regarding the education of English learners, consistent with Sections 3125 (State ESOL code) and 3126 (Federal Civil Rights) [Sec. 3116(b)(4)(B)].

The LEA assures that consultation took place with teachers, researchers, school administrators, and parents and family members, community members, public or private entities, and institutions of higher education, in developing and implementing its educational plan for English learners. [Sec. 3116(b)(4)(C)]

Step 1: Understand the Title III Assurances the LEA is agreeing to...

The LEA assures that, if applicable, it will coordinate activities and share relevant data under its plan with local Head Start and Early Head Start agencies, including migrant and seasonal head Start agencies, and other early childhood education providers [Sec. 3116(b)(4)(D)].

The LEA assures that all teachers in any Title III-funded language instruction educational program are fluent in English and any other language used for instruction, including having written and oral communications skills [Sec. 3116(c)].

The LEA assures that it assesses the English proficiency of all English learners consistent with Sec. 1111(b)(2)(G) [Sec. 3113(b)(3)(B)].

The LEA consults with officials of private schools in a timely and meaningful manner to make available equitable Title III, Part A services to eligible English learners and immigrant children attending private schools located within the LEA's geographical boundaries. [Sec. 9501]

Step 2: Complete the EL Program Information Tab

Consolidated Application

Application > Programs

Program Information

District Name : Appling County District Code : 601
Fiscal Year : 2019 Program : Title III-A, Language Instruction for English Lear - Original
Status : New (Date: Jul 2 2018 1:37PM) Superintendent Sign off date :

Program Information Budget Audit Trail Assurances Programs Attachments

STEP 1:
Language Instruction for Limited English Proficient and Immigrant Students
Note: The LEA's ESOL program to be described in Question 1 is NOT the LEA's Title III-funded program, as described in Questions 2 through 5. The ESOL program must not rely upon federal funds and must be: 1. Based on sound educational theory, 2. Adequately resourced and 3. Periodically evaluated for success. [Castañeda v. Pickard, 1981]

1. STATE-FUNDED CORE LANGUAGE PROGRAM. Describe the LEA's state/locally-funded ESOL program, activities and materials. [Sec. 3121 (a)(1)] For LEAs in which schools are consolidating Title III funds, the entirety of the language support program (federal, state and local) will be described here.

characters left

Include in this response the number of ESOL personnel funded (fully or partially) through state/local QBE:
Number of ESOL teachers
Number of ESOL coaches, if any
Number of district level ESOL support staff, if any (e.g. interpreters, translators, admissions staff, counselors, etc.)

Note: Questions 2, 3 and 4 do not apply to an LEA consolidating all its Title III funds in its Title I schoolwide schools.

2. SUPPLEMENTAL TITLE III PROGRAMS & EVIDENCE OF EFFECTIVENESS. Provide evidence of the effectiveness of programs and activities proposed to be developed, implemented and administered under Title III that will help ELs increase their English language proficiency and meet the challenging state academic standards as identified in the CNA. Include extended learning opportunities, summer school, and any other innovative programs that are planned. [Sec. 3116 (b)(1)] [In lieu of response, LEA may attach a completed Effectiveness Levels template (and Logic Model template, as needed) for each Title III-funded academic program/activity.]

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1st Question: The ESOL Language Program

- Describe the LEA's state & locally-funded ESOL Language Program, activities and materials. [Sec. 3121 (a)(1)]
- LEAs consolidating Title III funds must describe the **entire** schoolwide (federal + state + local) language instruction educational program (LIEP).
- **Note:** Please **DO NOT** describe the supplemental Title III-A Language Program in Question #1.

1st Question Continued:

- Include in this response the number of ESOL personnel funded (fully or partially) through state & local QBE.
- *A number must be entered even if it's a zero (0).*
 - # of ESOL teachers
 - # of ESOL coaches, if any
 - # of district level ESOL support staff, if any (e.g. interpreters, translators, admissions staff, counselors, etc.)

How are ESOL & Title IIIA Different?

ESOL Language Program

- Is the core, OCR-required, state-funded language instruction program funded through state ESOL QBE/FTE funds and local funds.
- Provides:
 - ESOL teachers
 - ESOL classrooms & instructional resources
 - ESOL teacher training

Supplemental Title III, Part A Language Program

- Is the supplemental language program funded with a federal subgrant
- Provides:
 - Additional, supplemental language instruction
 - Professional learning and
 - Parent and community engagement activities
 - Sometimes includes funds for an Immigrant program

How are ESOL & Title IIIA Different?

ESOL Language Program

- Is required by OCR for each & every EL student in the LEA
- LEA monitors and evaluates EL students whose parents have opted out of ESOL
- LEA monitors and evaluates exited EL students' progress

Supplemental Title III, Part A Language Program

- Is provided only to EL students based on need for extra English instruction
- Is **only available** for **current EL students who are also enrolled the school's ESOL language program.**

How are ESOL & Title IIIA the Same?

Both...

- serve EL students identified according to the **statewide standardized EL entrance and exit procedures**
- provide an **effective program** with effective strategies, activities, and interventions for EL students
- ensure EL students reach full **English** proficiency
- ensure EL students achieve **academic** proficiency

Note: Questions #2, #3 and #4 do not apply to LEAs consolidating all Title III funds in Title I schoolwide schools.

2nd Question: Supplemental LIEP

- Describe the supplemental language-focused strategies, activities, interventions, supplemental program you plan to provide and fund in **FUNCTION 1000**, and how they meet the needs of EL students as identified in the CNA/DIP. [**Sec. 3115(c)(1)**]
- Describe the **evidence** of the effectiveness of these programs and activities to help EL students increase their English language proficiency and achieve academically.

Note: Questions #2, #3 and #4 do not apply to LEAs consolidating all Title III funds in Title I schoolwide schools.

3rd Question: Sustained EL-focused Professional Learning

- Describe the effective professional development planned to be provided to educators working with English learners that is designed to improve their instruction and assessment of English learners as well as their ability to understand and implement practices, measures and strategies specific to ELs. [**Sec. 3115(c)(2)**]

Note: Questions #2, #3 and #4 do not apply to LEAs consolidating all Title III funds in Title I schoolwide schools.

4th Question: Other Activities

Describe the other activities and strategies put in place to enhance or supplement English learner language programs and specify how these activities and strategies incorporate an aspect of parent, family, and community engagement. **[Sec. 3116(b)(3)]**

Note: Questions #5 ONLY applies to LEAs consolidating all Title III funds in Title I schoolwide schools.

5th Question: Monitoring the Title III Program

- Describe how the LEA will ensure that elementary schools and secondary schools receiving funds under the subpart assist English learners in achieving English proficiency based on the State's English language proficiency assessment under section 1111(b)(2)(G), consistent with the State's long-term goals, as described in section 1111(c)(4)(A)(ii) and meeting the State's challenging academic standards. [**Sec. 3116(b)(2)**]

Step 3: Building the Budget FINALLY!

- Follow all guidelines in Federal Program Handbook
- Thoroughly understand and follow *Supplement Not Supplant* in Title III
- Adhere to GaDOE Function & Object Code descriptions for budgets
- Use the Title III, Part A specific Budgeting TOOLS
 - [*FY 20 Budget Guiding Questions*](#)
 - [*FY 20 Chart of Accounts*](#)

Supplement Not Supplant in Title III (Sec 3115g)

Presumption of Supplanting:

1. Are the expenditures or activities required by other Federal, State, or local laws?
2. Were the expenditures or activities funded in previous years by other programs or non-federal funds?
3. Would the expenditures or activities happen in the absence of Federal funds?



Title III CANNOT be used to...



...fulfill the LEA's legal obligation under Title VI of the Civil Rights Act of 1964 and the Equal Educational Opportunities Act (EEOA):

1. Identify & assess all potential EL students in a timely, valid, and reliable manner
(this includes use of the WIDA Screeners)
2. Provide EL students with an educationally sound and successful ESOL language program

Title III CANNOT be used to...



3. Provide sufficiently well-prepared and trained staff and support for the ESOL language program
4. Ensure that EL students have equal opportunities to meaningfully participate in all curricular and extracurricular activities
5. Avoid unnecessary segregation of EL students
(Per OCR, LEAs must carry out chosen EL program in the least segregated manner consistent with achieving the programs' stated educational goals.)

Title III CANNOT be used to...



6. Ensure that EL students who have or are suspected of having a disability under IDEA or Section 504 are identified, located, and evaluated in a timely manner & that the language needs of EL students with disabilities are considered in evaluations and delivery of services.
7. Meet the needs of EL students whose parents opt them out of ESOL

Title III CANNOT be used to...



8. Monitor & evaluate EL students in ESOL to ensure their progress towards English proficiency and grade-level content standards (this includes administration of the yearly ACCESS assessment)
 - Exit EL students when they meet the state and LEA's exit criteria
 - Monitor exited EL students to ensure they were not prematurely exited and to remedy any academic deficits

Title III CANNOT be used to...



9. Evaluate the effectiveness of the LEA's ESOL program to ensure EL students are acquiring English proficiency and the program is reasonably calculated to allow EL students to attain parity of participation in the standard instructional program within a reasonable period of time
10. Ensure meaningful communication with limited English proficiency parents.

Critical Summary

- Title III funds **may not** be used to fund anything necessary to run the basic ESOL language program
- Title III **may not** fund anything that is required by **other** federal programs either.
- To use T3 funds on something required by another law or by OCR or that is otherwise provided to non-ELs, would likely constitute “supplanting”.

Title III can be used to...

Provide additional supports beyond your State ESOL program to select EL students.

Provide ongoing sustained EL-focused professional learning related to teachers, administrators, and other staff.

Develop additional activities/strategies to support EL parents and community members in the Title III LIEP.

TIPS for Successful Budgets!

- Budgets must be based on the annual needs assessment, be evidenced-based and be reflected in the EL Program Plan (budget worksheet).
- Collaborate with appropriate LEA staff to plan budgets and braid funds with other federal programs, when necessary.
- Follow Federal Programs Budget Requirements
- Follow Title III specific guidelines & tools:
 - [FY 20 Budget Q & A Chart](#)
 - [FY 20 Chart of Accounts](#)

<https://www.gadoe.org/School-Improvement/Federal-Programs/Pages/Title-III-Guidance.aspx>

Title III Required Activities (Sec. 3115 (c))

(1) increase the English proficiency of English Learners by providing **effective** language instruction educational programs (LIEPs) that meet the needs of English Learner and demonstrate success in increasing –

- (A) English language proficiency; and
- (B) student academic achievement; and

Title III Required Activities (Sec. 3115 (c))

(2) To provide effective PD to classroom **teachers** (including teachers in classroom settings that are not the settings of language 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 ELs;

(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 ELs;

Title III Required Activities (Sec. 3115 (c))

(2) continued...

(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 & duration (which shall not include activities such as 1-day or short-term workshops/conferences) to have a positive and lasting impact on the teachers' performance in the classroom, except...; and

Title III Required Activities (Sec. 3115 (c))

(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.

Authorized Activities

Sec. 3115(d)

- See pp. 12-13 in the Title III statute “pink book” –
- When the needs identified in the CLIP require an authorized activity,
and
- When all three (3) required activities are being met

2% CAP on Direct Administrative Costs

- The total of the direct administrative costs in Functions 2230 + 2300 must not exceed the 2% CAP.
 - Calculate 2% of the **original FY20 allocation**
 - Cannot round up!
- Direct admin costs include:
 - Title III Director's travel to conferences focused on the administration of federal grants, such as GCEL and the Federal Programs Conference
 - The Audit cost, when applicable.
 - Costs related to directly administering the grant.

Direct vs. Indirect Costs

- 2% CAP on Direct Admin Costs **does not** include any *Indirect Costs*, if these must be charged to the small Title III, Part A subgrant.
- LEA must use their negotiated indirect cost rate (See Title IA website)
- LEA must follow Federal Programs' guidelines for drawdown of Indirect Costs.
(See F.P. Handbook, p. 41-44.)



OPTIONAL:
Effectiveness
Template and/or the
Logic Model
Template for
strategies funded
under 1000, 2100,
2210, 2213.



- 1. Formal**
Job Description(s) for
all Title III-funded or
partially-funded staff.
- 2. Informal**
Description of Title III
work coded as
additional
compensation (Object
code 199).



Field Trip
Request
Form

Title III Budget Attachments

Posting Attachments

Consolidated Application

Application > Programs

Program Information

District Name : Forsyth County

District Code : 658

Fiscal Year : 2020

Program : Title III-A, Language Instruction for English Lear - Original

Status : New (Date: Aug 7 2019 9:54AM)

Superintendent Sign
off date :

Program Information Budget Audit Trail Assurances Programs Attachments

Print

Item#	Uploaded File	Created Date	Group		
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- Save your Title III attachments here.
- The file name should include the fiscal year (FY20), the program name (Title III), LEA name and a brief description of the information included on the attachment
- Example: FY20 Title III Tift County Parapro Job Description

Step 4: Submitting the Title III Budget

- Enter the budget within Consolidated Application
 - Ensure that the Title III-A Director and the Superintendent are provisioned to be able to sign off
- Submit the budget to the GaDOE for approval
 - Title III Director and Superintendent sign off

Want Timely Budget Approval?

- Is the CLIP approved?
- Are all outstanding audit and monitoring findings cleared?
- Are all the EL Program Plan questions answered thoroughly?
- Does the budget align with the Program Plan?
- Does each description in the budget line items give enough detail and clarity to demonstrate federal cost principles?



Want Timely Budget Approval?

- Are the Functions & Object Codes used correctly?
(See FY20 Budget tools!)
- Is the set-aside amount for private schools equitable services equal to the number of private school EL students X the EL PPA for FY20 – the 2% Direct Admin costs?
- Are the necessary attachments uploaded?
- Does the budget include all the information as described in the Budget Guiding Questions Chart?



Title III Carryover

- LEAs are expected to spend 100% of the original subgrant during the 15-month period of performance to carry out the EL Program Plan.
- Any unspent funds may be carried over to the next fiscal year; there is no carryover cap in Title III.
- All carryover funds must be 100% expended in the following fiscal year.
- After that, any unspent funds are returned to the GaDOE.

Title III Amendments

- Amendments must be submitted when any changes are made to the approved budget – both at the Function and Object code level (Title III-A narrow window of supplanting)
- Amendments may be submitted throughout the entire fiscal year – until Sept 30, 2020.
- Follow Federal Programs amendment process

Collaboration with the Finance Department!

- Ensure the finance department has entered the latest GaDOE approved budget in the local financial accounting system
 - Update local fiscal accounting system as budget amendments are submitted and approved
- Request Expenditure Detail reports from your finance office on a regular basis.
 - Review to ensure that expenditures have been coded to the correct function/object codes, as approved by the GaDOE
 - Review to ensure that expenditures within each function/object code do not exceed the approved budget.
 - If errors are identified, work with your finance office to correct the errors.
- Remember: The expenditure detail report must match the most recently GaDOE approved budget!

Spending the Title III Budgeted Funds

- Implement approved budget activities within the grant period of performance
- Spend and draw down your Title III funds in a timely manner. The funds are intended to benefit the current year's students.
 - Review, sign and date each draw down request prior to submission to the GaDOE, *if possible*. This will provide an extra level of budget monitoring to help you catch possible errors.
- Do not purchase anything that isn't on the approved budget.
- Do not use Title III-A funds to purchase items or services for non-ELs, including ELs who are not served in ESOL or exited ELs who are being “monitored”.

Coming in August – a more detailed Title III Budget Training Webinar on August 16, 2019 @ 1:00 p.m.

Northeast Region	Dr. Adria Griffin agriffin@doe.k12.ga.us 678-416-1273
Northwest Region	TBD
Central Georgia	Ms. Dely Roberts droberts@doe.k12.ga.us 470-421-9976
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Next Session: Title II, Part A

