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*Richard Woods, Georgia's School Superintendent*  
*"Educating Georgia's Future"*

# ESEA, Title III, Part A Language Instruction for English Learner and Immigrant Students Monitoring Guide

Please Note: The [GaDOE's CFM Indicators document](#) supersedes all information in this Monitoring Guide.

## Understanding the Monitoring Process:

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The **Title III, Part A Monitoring Process** provides information to the Georgia Department of Education (GaDOE) about a Local Education Agency's (LEA) policies, practices and procedures as they relate to services for English Learner (EL) and Immigrant students.

During the process of submitting a Consolidated LEA Improvement Plan (CLIP), a Title III-A EL Program Information Plan and a Title III-A Budget for approval, the LEA has assured the Georgia Department of Education that it:

1. Is maintaining Title III, Part A records and supporting documentation for at least three years, will provide such information as may be necessary for program evaluation; and will provide the Department with any information needed to carry out its responsibilities under the law.
2. Is adhering to the requirements of the applicable federal statutes and regulations, the state rules governing the program, and all other applicable statutes, including ***Title VI of the Civil Rights Act of 1964***. **ESEA Sec. 3115, Sec. 3116, Sec. 3121**

This optional document provides LEAs with steps in the monitoring process and a series of guiding questions to support the collection of the monitoring documentation listed on the *GaDOE Cross-Functional Monitoring (CFM) Indicators 2018-2019* document. The Title III, Part A Indicators in the CFM Indicators Document are: **Overarching Indicators 1, 3 & 5** and **Indicators 19.1-19.6**. An official SEA monitoring of the LEA's Title III, Part A program occurs when the Title III-A Education Specialist assigned to the LEA reviews the submitted documentation and triangulates it with information gathered from staff and parent interviews (for Onsite Monitoring only) and a review of EL student records. Subsequently, federal compliance determinations are made based on the evidences submitted and information provided by the LEA.

The CFM process, either Onsite or Desktop, measures compliance with Title III, Part A regulations, as required when Title III-funded programs, activities and/or services are delivered by an LEA. In September, the Title III-A Regional Specialist will notify the LEAs on the current monitoring cycle whether their review will be Onsite or Desktop. The Onsite CFM includes group interviews with classroom teacher of EL students, ESOL teachers, administrators, Title III-A Director, and EL parents (by phone). A review of EL records and some fiduciary documentation is also conducted onsite. The Desktop Review only includes documentation submitted in Digital File Folders and a phone interview with the Director.

## LEA Monitoring Preparation Steps:

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1. **Download the appropriate Monitoring Support Documents** from the GaDOE Title III, Part A Monitoring Forms and Resources: <http://www.gadoe.org/School-Improvement/Federal-Programs/Pages/Title-III-Monitoring-Documents.aspx>
  - a. *FY19 Cross-Functional Monitoring Indicators* (This is a link to Federal Programs site where you can download the current CFM Indicators document.)
  - b. *Title III-A Program Overview Form* (will be submitted 1 week prior to the Onsite CFM date)
  - c. *Title III-A Monitoring Guide*
  - d. *Organization for Monitoring (Sample)*
  - e. *LEA Monitoring DATA ROSTERS*
  - f. **Onsite Only:** *Staff Interview Sign-In Sheet*
  - g. **Onsite Only:** *Parent Interview Letter*
  
2. **Prepare the LEA Monitoring DATA ROSTERS** (excel spreadsheet)
  - a. **Option #1** - DO-IT-YOURSELF! (DIY)

Complete all the student data information in the six tabs on the *EL Monitoring DATA ROSTERS* Excel Spreadsheet Tabs., 1, 4, & 5.

    - i. **Tab 1:** Participating Private School EL-Y and Immigrant Roster
    - ii. **Tab 2a:** EL & M Student Record Data
    - iii. **Tab 2b:** EL Student Class Record Data
    - iv. **Tab 3:** Immigrant Student Roster
    - v. **Tab 4:** EL Parent Information (Onsite Only)
    - vi. **Tab 5:** LEA Staff List (Onsite Only)
  - b. **Option #2** - WAIT for Data Collections to populate the LEA EL Monitoring DATA ROSTERS. Since this is the first year for us to try this method, we may not have your pre-populated DATA ROSTERS until *November*, given that DATA from October FTE-1 will be used.
    - i. When you receive your prepopulated EL Monitoring DATA ROSTERS from your Title III-A Specialist (via the ConAPP message system), you will then review and update TABS 2a. & 2b. & 3 on the ROSTERS.
    - ii. "Clean" the data and add all new EL students on the ROSTERS that recently enrolled. Delete students who have withdrawn.

**Note: ALL LEAS must complete Tabs 1, 4 & 5 – these will not be done by Data Collections.**

Review each Title III-A related **CFM Indicator** listed on the **GaDOE CFM Indicators 2018-2019** document and, using this **Monitoring Guide**, consider the **LEA** requirements for each indicator.

3. **Create a digital file folder** labeled for each one of the Title III-A related CFM Indicators: Overarching Indicators 1, 3, & 5 and Indicators 19.1-19.5. (See **the Sample Organization for Monitoring Documents**)
  - a. You will create 8 main file folders labeled by Indicator.
    - i. Folder Indicator 1 – LEA Monitoring Schools Programs
    - ii. Folder Indicator 3 – Services Eligible Private School Students

- iii. Folder Indicator 5 – Internal Controls Expenditures Inventory Etc.
  - iv. Folder Indicator 19.1 – Entrance Exit Procedures
  - v. Folder Indicator 19.2 – Instructional Programs
  - vi. Folder Indicator 19.3 – Professional Development
  - vii. Folder Indicator 19.4 – Other Activities Strategies
  - viii. Folder Indicator 19.5 – Immigrant Program
  - ix. **(not in a folder)** Excel Spreadsheet – *EL Monitoring DATA ROSTERS*
- b. Within each main Folder for each Indicator, **create a subfolder named according to the evidences requested on the CFM Indicators 2018-2019 document** for each Indicator, such as those starting with “a”, “b”, “c”, etc.
- i. Indicator 1 – LEA Monitoring Schools Programs
    - 1. 1.1.a. Description – Narrative
    - 2. 1.1.b. Evidence of Implementation
  - ii. Indicator 3 – Services to Eligible Private School Students
    - 1. 3.1.a. DE1111 forms
    - 2. 3.1.b. Private School Invitation Letters
    - 3. 3.1.c. Evidence of Consultation with Private Schools
- Etc.** (For the rest of the details, please see *Sample Organization for Monitoring*)

**4. Within each Digital Subfolder, upload evidence documents by Fiscal Year.** (Please upload PDF documents.)

- a. *Example* Indicator 19.1 – Entrance Exit Procedures  
*Evidence that the LEA follows standardized statewide entrance and exit procedures and screens all potential English Learners within 30 days of school enrollment. (Sec. 3113)*  
 19.1. Evidence shall include:
  - 19.1.a. A copy of LEA’s policy procedures and processes related to following standardized statewide entrance and exit procedures for identify English Learners and Immigrant children and youth.*
 Subfolder 19.1.a. Policy Procedures Processes
  - Sub-Subfolder FY18 – Upload FY18 docs
  - Sub-Subfolder FY19 – Upload FY19 docs
- b. FOLLOW Naming Conventions – Do not use long names for documents. Thank you.

**5. Options for Submitting the Digital Files:**

- a. Submit digital files **4 weeks prior** to onsite monitoring date (onsite CFM) or on the onsite date (desktop review).
- b. Documents to support compliance for each Indicator must be scanned and uploaded (in pdf format) in the corresponding *Indicator-labeled* digital file folder, and then submitted to the GaDOE Title III, Part A Education Program Specialist assigned to your LEA, along with the LEA EL Monitoring DATA ROSTERS, in one of two methods:
  - i. As a zip folder attached to an internal ConAPP message
  - ii. On a flash drive snail-mailed to the Title III-A Specialist
- c. **Documents submitted must include information from the 2017 - 2018 school year (complete) and the current school year to date (partial).**
- d. **After the initial review of the documentation, follow-up requests for additional supporting documents may be made.**

**Note:** Ensure that you provide appropriate and enough supporting documentation in each digital file folder that corresponds to each CFM Indicators applicable to Title III, Part A. If you need assistance understanding the documentation requested or these guiding questions, please contact your LEA's Title III-A Program Specialist.

## CFM Indicator 1. LEA Monitoring of Schools and Programs

**Indicator 1.** The LEA conducts monitoring of its programs and subgrantees (if applicable) sufficient to ensure compliance with Federal program requirements. (See *CFM Indicators*, p. 2) **ESEA Title IX Sec. 9304**

### Guiding Questions:

1. What is our LEA's process for monitoring the Title III, Part A language instruction programs implemented in our schools?
2. How are schools made aware of Title III, Part A requirements concerning supplement, not supplant, inventory, and restrictive use of materials, student identification timelines, entrance and exit procedures?
3. What are the established policies and procedures in our LEA to guide the self-monitoring of our Title III, Part A programs? Who's responsible? How frequently does it occur? What are the procedures, timelines, and schedules?
4. What data do we review when we monitor our schools relative to the Title III-A language instruction program? What documentation do we maintain to verify we have monitored our schools?
5. Do we have a process for reporting and correcting schools' actions including information, procedures, timelines, schedules and data to be reviewed relative to the LEA's Title III program?
6. How do we record school findings and ensure implementation of school-level Title III-A corrective action plans?
7. What technical assistance have we provided to our schools to correct non-compliance findings made during self-monitoring?

***What are the Required and Possible Evidences to scan & upload?***

**See CFM Indicators, Section 1.1.a (1-7) and 1.1.b. (1-6)**

## CFM Indicator 3. Services to Eligible Private School Children

**Indicator 3.** 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 limited English proficient and Immigrant children attending private schools located within the LEA's geographical boundaries. (See *CFM Indicators*, p. 3) **ESEA Title IX Sec. 9501**

### Guiding Questions:

1. Do we have a list of all the private schools in our LEA geographical boundaries (attendance zone)? Do we have their DE1111 forms?
2. How does our LEA contact private schools to determine participation? Do we annually contact officials of all private schools within the LEA attendance zone to determine if such schools wish their Title III-eligible students to participate in Title III, Part A services?
3. How do we consult with private schools in a timely, meaningful and ongoing manner to determine the needs of ELs and immigrant children and which services to be provided?
  - a. What consultation/collaboration has already occurred or is currently occurring regarding services to eligible private school students?
  - b. Do we have sign-in sheets indicating the consultation/collaboration has taken place?
  - c. Do we have a process to assess the implementation of these services?
4. For participating private schools only: How are their ELs and immigrant children and youth identified and assessed? Do we have a complete and current list of these children/youth on the **Monitoring Data Roster**, Tab 1?
  - a. What services, supplies and/or materials do we provide to participating private schools?
  - b. How do we maintain title to and an inventory of Title III purchases made for use by private schools?

- c. Do we have copies of purchase orders, inventory logs, etc.?

***What are the Required Evidences to scan & upload?***

**See CFM Indicators, Section 3.1.a-f**

**CFM Indicator 5. Internal Controls, Expenditures, Inventory, Drawdowns, Cost Principles**

**Element 5.** The LEA adheres to Internal Controls regarding Title III-A expenditures, inventory and cash management and said controls are maintained in writing, as required by 2 CFR Part 200 (Allowability, Procurement, Time and Effort, Travel, Segregation of Duties, Stipends), are present, and meet requirements for internal controls. The LEA maintains accounting records that are supported by source documentation and costs are allowable under applicable laws and regulations. The LEA expends Title III-A funds to ensure compliance with Title III requirements (supplement, not supplant other federal and local funds) and to carry out activities consistent with the intent and purposes of Title III statute. (See *CFM Indicators*, pp. 5-7) **2 CFR Part 200; ESEA Title III Sec. 3115 (b), (g)**

**Guiding Questions:**

1. How do budget expenditures relate to activities that increase English language proficiency and academic achievement?
2. How does the LEA ensure that no more than two percent (2%) of its Title III funds are used for the administration of the grant?
3. How does the LEA ensure that its Title III-A costs are allowable under OMB Uniform Grants Guidance and EDGAR?
4. How does the LEA show that funds used for Title III-A programs and services follow Title III-A "Supplement Not Supplant" Guidance issued in October 2008, and support Title III-A law which provides these funds exclusively for the development, enhancement, and implementation of language programs for English Learner students, the procurement of instructional materials and technological tools, the professional development of teachers and school staff, and assistance for EL parents in improving the academic and English language skills of their children?
5. Does the LEA ensure that all Title III-A purchases align with the most current approved budget (or amended budget) in the Consolidated Application?
6. Does the LEA ensure that no more than 25% of its Title III allocation is carried over into a new fiscal year?
7. Have we uploaded a copy of *Title III-A System Payroll Expenditure Reports* (if applicable) and/or *Title III-A System Expenditure Detail Reports* for the **current fiscal year to date and the most recent previous fiscal year** (July 1 to June 30)?
8. Do we have all the Title III-A purchase orders in case they are requested for an onsite review?
9. Do we have all the source documentation for these expenditures (P.O.s, invoices, contracts, agendas, receipts, travel authorizations, pre-approval, Title III-A funded tutors/instructors' lesson plans, student rosters, time sheets, daily attendance, Title III-A funded administrative costs, etc.
10. For all staff whose salaries are supported with Title III-A funds, do we have a job description or list of functions/responsibilities? A copy of FY18 & FY19 Time/Effort Records, PARs, and supporting documentation?
11. For International Enrollment/Welcome centers – Do we have copies of purchase orders for all system expenditures of Title III funds from July 1 to June 30 of the **current fiscal year to date and the most recent previous fiscal year**.
12. Have we uploaded the current Title III-A Equipment Inventory with date and signature indicating most recent check (if applicable), including P.O.s documenting purchases of equipment with Title III-A funds?

***What are the Required Evidences to scan & upload?***

**See CFM Indicators, Section 5.1.a-I and 5.2**

## CFM Indicator 19: Title III Statute

**Element 19.1. Entrance and Exit Procedures.** The LEA follows standardized, statewide entrance and exit procedures and screens all potential English learners within 30 days of school enrollment. (See CFM Indicators p. 17) **ESEA Title III Sec. 3113(b)(2)**

### Guiding Questions:

1. How do we ensure that potential ELs are properly routed for screening? How do we ensure that screening takes place in a timely manner?
2. What are our written LEA policies and procedures regarding the **intake and screening** processes for potential English learners?
3. Do our procedures include use of a signed/dated Home Language Survey, screener results, and if applicable, additional documentation supporting placement?
4. What training is provided to staff involved in the intake and screening process to ensure that proper protocols and procedures are followed? Do we have evidence of policy dissemination and training on English learner intake and exit procedures?
5. What training is provided to staff to ensure that EL and immigrant data are correctly gathered and entered accurately in our SIS? Do we have travel records, agendas, attendance rosters, etc. indicating staff participation in state or local EL-related data entry trainings?
6. Do we follow the standardized, statewide procedures to exit EL students, including the use of the *EL Reclassification Review Form* (Only applicable at end of 2018-2019 school year)? Are these procedures written down somewhere, regarding the **exiting** process we follow for English learners?
7. How do we maintain EL student enrollment and exit records? How do we periodically review EL student records?
8. What are our procedures and how do we maintain record of EL monitoring two years post-exit?
9. Do our records demonstrate that exited students' WIDA ACCESS for ELLs® 2.0 results comply with state minimum exit criteria and local exit policy?
10. Do we have evidence of using the *EL Reclassification Review Form* (Only applicable at end of 2018-2019 school year).
11. How do we ensure that all staff has up-to-date knowledge of Title IIIA policies and procedures?
12. Have we reviewed, updated, and completed the EL Monitoring DATA ROSTERS?

### ***What are the Required Evidences to scan & upload?***

**See CFM Indicators, Section 19.1.a – 19.1.d**

## CFM Indicator 19.2. Language Instruction Programs

**Element 19.2. Language Instruction Programs.** The LEA uses Title III-A funds to increase the English language proficiency and student academic achievement of English Learner students by providing effective language instruction educational programs that demonstrate success. (See CFM Indicators, pp. 17-18) **ESEA Title III, Sec. 3115 (c)(1)**

### Guiding Questions:

1. How do we determine that our Title IIIA-funded instructional programs are effective? What are our instructional goals?
2. What instructional methods/models do we use in the supplemental Title III-A language programs? How do we know these are effective?

3. How do we determine that Title IIIA-purchased instructional resources are effective? What research sources do we use during the review process to select instructional materials?
4. Were these language instruction programs, strategies, interventions implemented in previous years in our LEA? If yes, what evidence indicates that these programs are effective in increasing the English language proficiency for EL students or the acculturation/sociocultural adjustment for Immigrants?
5. What evidence do we have that our supplemental language instruction educational activities and programs are evidence-based? (Strong? Moderate? Promising? Logic Model?)
6. What evidence do we have for the Title III-A funded supplemental language program? Time sheets? Lesson plans? Student attendance rosters? Time sheets? Descriptions? Feedback? Meeting agendas? (for after-school tutoring/summer programs, when applicable).

***What are the Required Evidences to scan & upload?***

**See CFM Indicators, Section 19.2.a – 19.2.c**

### CFM Indicator 19.3. Professional Development

**Element 19.3. Professional Development.** The LEA provides effective professional development to teachers and staff (including ESOL and non-ESOL teachers and administrative staff), that is designed to improve the instruction and assessment of EL students, is based on evidence-based research, is effective in increasing ELP and academic achievement of EL students, and is of sufficient intensity and duration to have a positive and lasting impact on the educators’ performance in the classroom. **ESEA Title III Sec. 3115(c)(2)**

**Guiding Questions:**

1. How do we determine the topics for our EL-related professional development? Do we have a one- two- or three-year plan?
2. Do we have evidence that our local needs assessment outcomes impacted local EL professional development offerings?
3. Do we have a copy of our Title III-A professional development plan, including needs assessment, long-range professional development goals, and the meeting dates, session agendas, handouts, sign-in sheets when the plan was developed?
4. How do we measure the effectiveness of our EL-related professional development?
5. Do we have evidence that we have provided EL-focused PD to ESOL and classroom teachers, principals, administrators and other school or community-based personnel?
6. How do we ensure that teachers and administrators are provided long-term or sustained EL-related professional development of enough intensity and duration to have an impact on their practices with English Learners?
7. Do we have evidence that our locally-supported professional development is effective and supportive of English development and subject matter knowledge and does not consist of one-day or short-term workshops or conferences?
8. Do we have evidence that any conference or short-term workshop participation is part of a larger PD plan that ensures sustainability and scalability across the LEA?
9. Have any of our staff attended EL-focused professional development provided by the GaDOE or other non-local entities?
10. Do we have documentation indicating teacher and administrator participation in EL-specific PD, including agendas, conference materials, expense statements, etc.?

***What are the Required Evidences to scan & upload?***

**See CFM Indicators, Section 19.3.a – 19.3.d.**

### CFM Indicator 19.4. Other Effective Activities

**Element 19.4. Other Effective Activities and Strategies.** The LEA implements effective activities or strategies that enhance or supplement Title IIIA-funded language programs for ELs, including engaging parents, family and community in the Title IIIA-funded activities, and which may include strategies that serve to coordinate and align related programs. (See CFM Indicators, p. 18) **ESEA Title III Sec. 3115(c)(3)**

**Guiding Questions:**

1. What other activities or strategies do we implement in our LEA that enhance the Title IIIA-funded language programs?
2. How are EL parents, families and communities included and engaged in these additional activities/strategies?
3. If the parent engagement component is held in conjunction with Title I EL parent engagement and outreach, how do we ensure compliance with the Title III-A requirement that the outreach “enhances or supplements” Title IIIA-funded language programs?
4. Do we have evidence of strategies or activities that we’ve implemented to supplement our specific Title III-A language instruction program?
5. Do we have evidence that our supplemental Title III-A language program includes EL parent, family and community engagement activities as well?
6. Do we have copies of communications (i.e. invitations, materials), in appropriate languages, disseminated to parents of ELs regarding opportunities for their engagement in activities or strategies that enhance/supplement the Title III-A language programs?
7. Do we have records of agendas, invoices, presentations, meeting notes, handouts, dated sign-in sheets demonstrating we implemented these EL parent, family and community engagement activities?
8. (Onsite Only) Did we send home to all EL parents the Title III-A Parent (*Telephone*) Interview invitation letter? Did we send it home in all the applicable languages? Did we keep a copy to upload as evidence?
9. Did we complete the EL Parent Interview Roster (Tab 4) on the LEA Monitoring DATA ROSTERS?

***What are the Required Evidences to scan & upload?***

**See CFM Indicators, Section 19.4.a – 19.4.d.**

**CFM Indicator 19.5. Immigrant Program**

**Element 19.6 Immigrant.** *If applicable*, the LEA uses Immigrant funds to pay for activities that provide enhanced instructional opportunities for immigrant children and youth. (See CFM Indicators, p. 19) **ESEA Title III Sec.3115 (e)**

**Guiding Questions:**

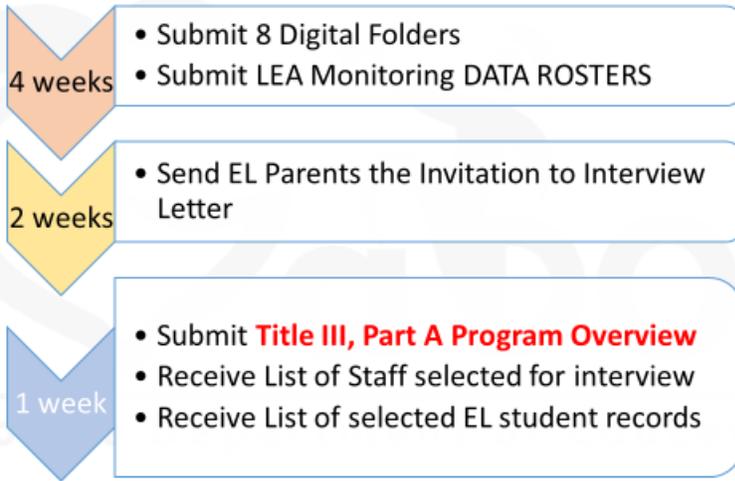
1. Did we provide materials and/or activities to support our increased immigrant population?
2. What process led us to select these immigrant-specific activities and/or materials?
3. Do we have evidence that these programs/services/activities/materials were selected based on the needs of the immigrant population within our LEA?
4. Do these activities/materials provide acculturation and enhanced instructional opportunities or resources for immigrant children and youth?
5. Do we have a written description of activities performed/materials purchased with Immigrant funds (if Immigrant and how these activities/materials supported the special needs of immigrant children and youth?
6. What kind of activities or program do we provide for Immigrant students who are already fluent in English? Did we complete the list of qualifying immigrant students, their age, country of birth, date of entry in U.S. schools, primary language and their EL status on the LEA Monitoring *DATA ROSTERS* Excel file?
7. Do we have a complete list of system expenditures of Immigrant funds from July 1 to June 30 of the most recent fiscal year and purchase orders where applicable?

***What are the Required Evidences to scan & upload?***

**See CFM Indicators, Section 19.5.a – 19.5.d.**

## Onsite Monitoring Timeline:

### Title III, Part A Onsite Monitoring Timeline



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## Onsite Review of EL Student Records:

The Title III-A Regional Specialist will pre-select EL student folders for review on the day of the onsite monitoring visit. These records may include students who are EL-Y, EL-M1 or 2, EL-Yes/ESOL-No due to Parent Waiver; ELSwD; and students who Did Not Qualify after screener administration. The Specialist will send the LEA this list of student records to review one week prior to the onsite CFM date. This list will be sent through the secure Portal messaging system.

## Post-Monitoring Process:



### Post-Monitoring Process



#### Within Monitoring Portal

1. GaDOE sends Title III-A Monitoring Report to LEA (30 days).
2. If applicable, LEA submits Corrective Action Plan (**CAP**) 30 days after receipt of Report.
  - GaDOE provides CAP template
3. If applicable, LEA revises CAP.
4. GaDOE approves CAP.

#### Virtually and In-person

1. LEA must fully implement CAP within one year of CAP approval.
2. GaDOE provides post-monitoring technical assistance during CAP implementation process.
3. LEA provides progress monitoring updates to GaDOE during technical assistance meetings.

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