Title III-A FY19 Budget Training for New Directors

Adria Griffin, Dely Roberts, Meg Baker & Tammie Smith
June, 2018
Where do I find Title III-A on the DOE website?

http://www.gadoe.org/School-Improvement/Federal-Programs/Pages/Title-III.aspx
Today’s Budget Topics:

1. General Title III-A Grant Information
2. How Allocations are Determined
3. Title III-A Grant Timeline
4. Title III-A EL Program Requirements
5. Title III-A Immigrant Program Requirements
6. Supplement, Not Supplant
7. Building the Budget
8. Spending the Funds
#1. General Title III-A Grant Information
Basic Fiscal Information

- Federal Agency: U.S. Department of Education
- **FAIN**: S365A180010
- **DUNS**: 806743159
- **CFDA**: 84.365A English Language Acquisition, Language Enhancement and Academic Achievement Program for Limited English Proficient Children
Federal Programs Handbook

FEDERAL PROGRAMS HANDBOOK
Information Applicable to All Federal Programs
#2. How Allocations are Determined
USED Title III-A Grant is allocated to LEAs in 2 Title III-A Grants:

- 95% English Learner
- 5% Immigrant

6/11/2018
Do the Math!

- Title III-A English Learner (EL) grant is divided by the total number of EL-Y students as reported on the March FTE Count.
- Results = per-EL allocation amount.
• FY19: 82 ELs = $10,000
• SEAs cannot award Title III English Learner grants that are less than $10,000.
#3.
Title III-A Grant Timeline
<table>
<thead>
<tr>
<th>LEAs Count ELs</th>
<th>State Determines per-EL allocation amount</th>
<th>State presents to Board</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>March FTE Count</strong>&lt;br&gt;ELs in participating private schools&lt;br&gt;Immigrant student count</td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td><strong>FY19 – 82 ELs</strong>&lt;br&gt;Threshold to receive $10,000 allocation</td>
<td><strong>After approval, LEA Title III-A grant allocations are posted on Title III-A website.</strong>&lt;br&gt;<strong>LEAs receive a formal grant award letter.</strong></td>
</tr>
</tbody>
</table>
• July 1, 2018 - September 30, 2019 = FY19 Grant Period of Performance

• FY19 Budget submission deadline: October 1, 2018

• Carryover added after FY18 Title III-A Completion Report is submitted.

• Amendment submission ongoing throughout the year.
#4. Title III-A English Learner Program Requirements
Title III-A Website Resources

http://www.gadoe.org/School-Improvement/Federal-Programs/Pages/Title-III-Guidance.aspx
Title III-A Intents & Purposes - Sec. 3115 (a)

• “...agree to expend the funds to improve the education of ELs by assisting (them) to learn English & meet the challenging State academic standards.”

• “…shall use effective approaches & methodologies for teaching ELs & immigrant children/youth for these purposes:

  1. Develop & implement NEW language programs...
  2. Carry out highly focused, innovative, locally-designed activities to EXPAND/ENHANCE existing language programs...
  3. Implement schoolwide programs (& #4 – districtwide) to RESTRUCTURE/REFORM/UPGRADE all relevant programs related to language & academic content instruction for ELs & immigrants
Title III-A Required Activities – Sec 3115 (c):

An eligible entity receiving funds under section 3114(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 Learner and demonstrate success in increasing –

(A) English language proficiency; and
(B) student academic achievement; and
Title III-A 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-A 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-erm workshops/conferences) to have a positive and lasting impact on the teachers’ performance in the classroom, except...; and
Title III-A 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 Leaners which –

(A) shall include parent, family, and community engagement activities; and

(B) may include strategies that serve to coordinate and align related programs.
Title III-A Authorized Activities – Sec 3115 (d):

1. Upgrade...
2. Improve...
3. Provide...(A) & (B) intensified instruction, which may include...
4. Develop & implement...
5. Improve...
6. Provide... (A) & (B) to assist parents & families in helping their children....
7. Improve...(A), (B), & (C),
8. Offer early college H.S. or dual....
9. Carry out other activities that are consistent with the purposes of this section.
Title III-A Program Requirements that become Assurances:

1. **Adherence** to uniform, statewide ESOL entrance and **exit** procedures [Sec. 3113(b)(2)]

2. **Screening** of all potential ELs within 30 days of enrollment in a school [Sec. 3113(b)(2)]

3. Compliance with Title I requirement to **test 100% of ELs** on the ACCESS for ELLs assessment [Sec. 3113(b)(3)(B)]

4. Using Title III funds in ways that **build capacity** to support ongoing EL content area achievement [Sec. 3113(b)(3)(E)]
Title III Program Requirements:

5. LEA certification that all teachers in a Title III-funded language instructional program/activity are fluent in written and oral English. [Sec. 3116(c)]

6. Selection of one or more methods or forms of effective instruction to be used in the supplemental programs to assist ELs in reaching English proficiency and meeting content standards. [Sec. 3115(f)(1)]
As a condition of receiving the federal funds for which application is made in this Consolidated Application, the applicant’s local board of education (Applicant) assures the following:

1. each such program will be administered in accordance with all applicable statutes, regulations, program plans, and applications;
2. the control of funds provided under each such program and title to property acquired with program funds will be in a public agency or in an eligible private agency, institution, organization, or Indian tribe, if the law authorizing the program provides for assistance to those entities; and
3. the public agency, eligible private agency, institution, or organization, or the Indian tribe will administer the funds and property to the extent required by the authorizing statutes;
4. the applicant will adopt and use proper methods of administering each such program, including—
   a. the enforcement of any obligations imposed by law on agencies, institutions, organizations, and other recipients responsible for carrying out each program; and
   b. the correction of deficiencies in program operations that are identified through audits, monitoring, or evaluation;
5. the applicant will cooperate in carrying out any evaluation of each such program conducted by or for the State educational agency, the Secretary, or other Federal officials;
6. the applicant will use such fiscal control and fund accounting procedures as will ensure proper disbursement of, and accounting for, Federal funds paid to the applicant under each such program; and
7. the applicant will—
   a. submit such reports to the State educational agency (which shall make the reports available to the Governor) and the Secretary as the State educational agency and Secretary may require to enable the State educational agency and the Secretary to perform their duties under each such program; and
   b. maintain such records, provide such information, and afford such access to the records as the State educational agency (after consultation with the Governor) or the Secretary may reasonably require to carry out the State educational agency’s or the Secretary’s duties; and
   c. before the application was submitted, the applicant afforded a reasonable opportunity for public comment on the application and considered such comment.

Program Specific Assurances:

**Title III, Part A - Language Instruction for English Learners and Immigrant Students**

The LEA assures compliance with standardized, statewide ESOL 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 section 1112(e) 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 constitutional law, regarding the education of English learners, consistent with Sections 3125 and 3126 [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 an educational plan for English learners. [SEC 3116(b)(4)(C)]

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 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 boundaries. [Section 9501]
General Title III-A Assurances

1. The LEA complies with standardized statewide ESOL entrance and exit procedures and screens all students who may be English learners within 30 days of enrollment. [SEC. 3111(b)(2)(A)]

2. The LEA assures compliance with section 1112(e) prior to, and throughout, each school year as of the date of application [SEC. 3116(b)(4)(A)]

3. The LEA assures that it is not in violation of any State Law, including constitutional law, regarding the education of English learners, consistent with Sections 3125 and 3126 [SEC. 3116(b)(4)(B)].
General Title III-A Assurances

4. 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)]

5. 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)]
General Title III-A Assurances

6. 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)]

7. 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. [Section 9501]
#5.
Title III-A Immigrant Program Requirements
Title III Resources

- Title III Program Management Guidance
- Title III Monitoring Documents
- Federal Resources
- 2017-18 Title III LEA Annual Report
- Complaint/Comment

NEW! Starting in 2018 - 2019: LEA Consortia Information

- Individual LEA Consortia: Directors’ Session PPT
- 2018 - 2019 LEA Title III Consortium Management Guidelines
- 2018 - 2019 Sample LEA Title III Consortium MOU / Agreement
- 2017 - 2018 Current MOU between State and SW GA RESA
- “Green Map” of Consortium contributions (for 2017-18), by LEA
- Spreadsheet of Consortium contributions (for 2017-18), alphabetical by LEA

Budgeting for Allowable Title III Activities

- FY18 Chart of Accounts
- FY18 Budget Q & A Chart

Title III Program Planning

- Comprehensive Needs Assessment - Title III Considerations
- Completing the “Program Information” Tab & Budget in the ConApp PPT/PDF
- Field Trip Approval Form
- Private Schools and Title III Services

Immigrant Grant Guidance

- Immigrant Definition and Allocation Rules
- Immigrant Funds - Allowable Activities

Where to find Immigrant information on the web!
Title III-A Immigrant Allocation - Intents & Purposes

• Per Title III law, a reservation of funds is made to provide cultural and social supports to students identified as Immigrants.

5% Immigrant

95% ELs
Who is an “IMMIGRANT”? The definition of “immigrant” under Title III law is unique. A student is considered by Title III to be an immigrant if he/she meets three requirements:

1. Born outside of the U.S. or Puerto Rico
2. Enrolled in U.S. schools for less than 3 years
3. Is between the ages of 3 and 21
How LEAs Qualify to Receive Immigrant Funds

LEAs qualify for Immigrant funds if they show a “significant increase” in immigrant students. Per law, this increase must be measured against the most recent two years’ average.

In Georgia, an LEA may qualify for an Immigrant grant if, based on March FTE its most recently reported immigrant student population is 50 or more.

The $10,000 minimum allocation requirement does not apply to Immigrant grants, therefore it is possible for an LEA to receive an Immigrant allocation despite not meeting the minimum allotment for an EL allocation.
## Immigrant Definition & Allocation Rules on T3 Website

**TITLE III, PART A–SUBGRANT FOR IMMIGRANT CHILDREN AND YOUTH**

**GEORGIA’S ELIGIBILITY REQUIREMENTS**

**Immigrant Children and Youth Subgrant Eligibility Requirements:**

Districts qualify for an Immigrant subgrant if their immigrant student count is at or above 50 and that number represents an increase of at least 10% over the LEA’s previous two-year average immigrant population.

<table>
<thead>
<tr>
<th>District Name</th>
<th># Immigrant Students Reported in Current Year</th>
<th>LEA meets minimum number for Immigrant grant?</th>
<th># Immigrant Students Reported Year One (2015-2016)</th>
<th># Immigrant Students Reported Year Two (2016-2017)</th>
<th>Minimum Number Current-Year Immigrant Students Needed to Qualify</th>
<th>Is Current-Year Number ≥ 10% the Average of the Previous 2 Years?</th>
</tr>
</thead>
<tbody>
<tr>
<td>SAMPLE 1 A County Schools</td>
<td>600</td>
<td>Yes</td>
<td>570</td>
<td>585</td>
<td>636</td>
<td>NO</td>
</tr>
</tbody>
</table>

(10%-increase over average of Year 1 and Year 2)
Authorized Immigrant Activities

1. Family literacy, parent and family outreach and training designed to assist caregivers in becoming active participants in their child’s education

2. Recruitment of and support for personnel who have been specifically trained to provide services to immigrant students

3. Immigrant student tutorials, mentoring and academic or career counseling
Authorized Immigrant Activities

4. Instructional services, supplies or transportation costs that are *directly attributable to the presence of immigrant students* in the LEA.

5. Other instructional services to assist *immigrant students in achieving* in U.S. schools, such as programs of introduction to the U.S. educational system and civics education.

6. Offering comprehensive *community services* in coordination with entities that have expertise in *working with immigrants*.

7. Curricular materials, educational *software* or *technology* that *support* the instructional or community services provided by this grant for *immigrant students and families*. 

6/11/2018
#6. Supplement/Not Supplant
Title III Sec. 3115 (g)

• “Federal funds made available under this subpart shall 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 and Immigrant children and youth and in no case to supplant such Federal, State, and local public funds.”
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 non-federal funds?

3. Would the expenditures or activities happen in the absence of Federal funds?
#7.

Building the Budget
Georgia’s Systems of Continuous Improvement
Developing Budgets

District Develops Federal Program Budgets

- District Plans for Federal Programs to Supplement the Action Steps
- District Creates Action Steps to Address Needs
- Needs Identified in the CNA

Identified needs are the core of the budget development and approval process.
FY 19 Consolidated LEA Applications
### Consolidated Application Programs – Federal Grants – Title III-A

**Program Status**

**District Name:** Appling County  
**Fiscal Year:** 2018  
**District Code:** 601

#### Title Programs

<table>
<thead>
<tr>
<th>Program</th>
<th>Applied As</th>
<th>Budget Status</th>
<th>DC Status</th>
<th>Program Type</th>
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<tbody>
<tr>
<td>Education for Homeless Children and Youth</td>
<td>Single District</td>
<td>New</td>
<td>New</td>
<td>Original</td>
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<tr>
<td>Title I-A, Improving The Academic Achievement</td>
<td>Single District</td>
<td>New</td>
<td>New</td>
<td>Original</td>
</tr>
<tr>
<td>Title I-A, Neglected &amp; Delinquent</td>
<td>Single District</td>
<td>New</td>
<td>New</td>
<td>Original</td>
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<tr>
<td>Title I-C, Migrant Education</td>
<td>Single District</td>
<td>New</td>
<td>New</td>
<td>Original</td>
</tr>
<tr>
<td>Title II-A, Improving Teacher Quality</td>
<td>Single District</td>
<td>New</td>
<td>New</td>
<td>Original</td>
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<tr>
<td>Title VI-B, Rural and Low Income</td>
<td>Single District</td>
<td>New</td>
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#### Federal Grants

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<tr>
<th>Program</th>
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<th>Budget Status</th>
<th>DC Status</th>
<th>Program Type</th>
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<tr>
<td>Title III-A, Immigrant - 681</td>
<td>Single District</td>
<td>New</td>
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<td>Original</td>
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<tr>
<td>Title III-A, Language Instruction for English Lear</td>
<td>Single District</td>
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<td>Original</td>
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<tr>
<td>Title IV-A, Student Support and Academic Enrichment</td>
<td>Single District</td>
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<td>Original</td>
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</table>
### Budget Tab

#### Consolidated Application

**Budget**

- **District Name**: Appling County
- **Fiscal Year**: 2018
- **Status**: New (Date: Jul 20 2017 4:12PM)
- **District Code**: 601
- **Program**: Title III-A, Language Instruction for English Lear
- **Superintendent Sign off date**: 

The Budget Tab shows the following allocations:

- **Current FY Allocation**: $0.00
- **Additional Allocation**: $0.00
- **Carry Over**: $0.00
- **Total Grant Award**: $0.00
- **Transfer Amount**: $0.00
- **Total Amount to be Budgeted**: $0.00
- **Not Budgeted Funds**: $0.00

#### Budget Detail

<table>
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<tr>
<th>Fiscal Year</th>
<th>From Program</th>
<th>School</th>
<th>To Sub-Grant</th>
<th>To Program</th>
<th>Function</th>
<th>Object</th>
<th>Units</th>
<th>Price</th>
<th>Amount</th>
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<td>$0.00</td>
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6/11/2018
Program Information Tab

Program Information

District Name: Appling County
Fiscal Year: 2018
Status: New (Date: Jul 20 2017 4:12PM)

District Code: 601
Program: Title III-A, Language Instruction for English Learner - Original
Superintendent Sign off date: 

STEP 1:
Language Instruction for Limited English Proficient and Immigrant Students

1. Describe the effective 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.

2. Describe the effective professional development that will be provided to educators working with English learners to ensure systematic growth for English learners in English language and academic content skills. Indicate the topic, the intended participant group for each offering and the planned duration of each offering.

3. Describe how the eligible entity 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.

4. Describe the LEA’s policies and procedures for:
   - entering students into the ESOL program;
   - exiting students from the ESOL program, and;
   - monitoring exited students’ progress for a period of at least two years.

5. Describe how the LEA will provide technical assistance and support to its schools and educators to ensure effective implementation of its Title III-funded initiatives.
1st Question:

1. STATE-FUNDED CORE LANGUAGE PROGRAM

Describe the LEA’s state/locally-funded ESOL program, activities and materials. [Sec. 3121 (a)(1)]

• The LEA’s ESOL program may 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]

Note: 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.
1st Question Continued:

1. STATE-FUNDED CORE LANGUAGE PROGRAM (Cont.)

Include in this response the number of ESOL personnel funded (fully or partially) through state/local QBE:

- # of ESOL teachers
- # of ESOL coaches, if any
- # of district level ESOL support staff, if any (e.g. interpreters, translators, admissions staff, counselors, etc.)

Note: A number must be entered even if it’s a zero (0).
2nd Question:

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 complete Effectiveness Levels template (& Logic Model template, as needed) for each Title III-funded program/activity.
Note: Questions #2, #3 & #4 do not apply to an LEA consolidating all its Title III funds in its Title I schoolwide schools.

3rd Question:

3. SUSTAINED 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)]

• In lieu of response, LEA may attach a complete Effectiveness Levels template (& Logic Model template, as needed) for each Title III-funded program/activity.
Note: Questions #2, #3 & #4 do not apply to an LEA consolidating all its Title III funds in its 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)]

- In lieu of response, LEA may attach a complete Effectiveness Levels template (& Logic Model template, as needed) for each Title III-funded program/activity.
5th Question:

5. TITLE III PROGRAM OVERSIGHT

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)]
 Budgeting for Allowable Title III Activities

- FY19 Chart of Accounts
- FY19 Budget Q & A Chart

Title III Program Planning

- Comprehensive Needs Assessment - Title III Considerations
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- Field Trip Approval Form
- Private Schools and Title III Services

Immigrant Grant Guidance

- Immigrant Definition and Allocation Rules
- Immigrant Funds - Allowable Activities
Federal Programs
Chart of Accounts
• Functions
• Objects

Line Item Descriptions
• Consistency
• Specificity


Budget Q & A Chart
http://www.gadoe.org/School-Improvement/Federal-Programs/Pages/Title-III-Guidance.aspx

Tools for Creating a Budget
Period of Performance

• Flexibility

• Funds intended to benefit students in the fiscal year through the grant period (GAN)

• Purchases may extend beyond one year to take advantage of cost reductions IF the students in the current fiscal year receive benefit from the purchase.

• Leases/Licenses: IF instructional software subscriptions are purchased after January, the LEA **must** provide explanation within budget description indicating how students in current fiscal year will benefit from purchase.
Functions 2210 & 2213?

• In general, **2213** should be used for **professional development of instructional staff**: teachers, paraprofessionals, principals, assistant principals and instructional coaches.

• **2210** is for the **Improvement of Instructional Services** and should not be used for any PD costs.
  - **Instructional coaches providing direct services to students** should be coded in 2210.

• **NOTE**: State-required **ESOL programmatic PD cannot be charged to Title III**.
2% Admin CAP

- 2% CAP of the *original allocation* for direct admin expenses
- Includes **DIRECT Admin Costs** + Audit Costs.
- Both Functions 2230 + 2300 (*No Indirect costs*)

**Note:** Code Title III Directors’ registration & travel to conferences that deal with administration of the grant in Function 2230 (i.e. GCEL, Federal Programs’ Conf)
Required Attachments

Attachments are required **only if the district is requesting funding for the following:**

• **Formal Job Description(s)** for all Title III-funded staff

• **Informal Description** of Title III work coded as additional compensation (object code 199)

• **Field Trip Request Form** - include copies of the request for DOE approval
### Consolidated Application

**Title III Attachments!**

<table>
<thead>
<tr>
<th>Item#</th>
<th>Uploaded File</th>
<th>Created Date</th>
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<tbody>
<tr>
<td>4</td>
<td>FY 2018 Foster Care Education.pdf</td>
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<td>5</td>
<td>FY 2018 Foster Care Education.pdf</td>
<td>7/25/2017 4:34:22 PM</td>
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</table>
Prior to Budget Approval

• Must have an approved CLIP
• All outstanding audit and monitoring findings must be cleared.
• Detailed budget, Program Plan, and relevant attachments must all be submitted.
Title III-A Carryover
(T3 PG, p. 22)

• Districts are expected to spend 100% of the original Title III-A fund allocation during the 15-month period of performance.

• However, if necessary......25% of the ORIGINAL allocation may be carried over to the next fiscal year.

• LEAs will receive a letter from the GADOE Grants Accounting Office announcing the Carry-Over amount.
  • The LEA then has 45 days to amend the Budget!

• All carryover funds MUST be 100% expended in the following fiscal year, NO exceptions.

• Any unspent funds are returned to the GADOE.
Amendment Process
(T3 PG, p. 23)

• See EDGAR 2 CFR Part 200.308

• After initial Budget approval, any transfer of funds from one function or object code to another requires a Budget Amendment to be submitted for approval.

• Amendments are supported in CNA/DIP & Program Plan

• Amendments may be submitted until the end of the budget period (Sept 30).

• Amendments are subject to a comprehensive review process, including the original budget.
# 8. Spending the Funds
Uniform Grant Guidance

• The LEA Title III Director is expected to manage Title III expenditures by adhering to the Uniform Grant Guidance in the Administrator’s Handbook on EDGAR, 3rd Edition (2015).
2 CFR Part 200 Requires Procedures

- Written Cash Management Procedure - §200.302(b)(6) and §200.305
- Written Allowability Procedures - §200.302(b)(7)
- Written Procedures for managing equipment §200.313(d)
- Written Conflicts of Interest Policy - §200.318(c)
- Written Procurement Procedures - §200.319(c)
- Written compensation and leave policies §200.430
- Written Travel Policy - §200.474(b)

Written policies and procedures are required!
Procedures for Checking Suspension and Debarment – 2 CFR § 180.25(a)
Procedures for Financial Management

• Include information on:
  – Your accounting system(s)
  – How budgets are loaded onto the system
  – Process for comparing budgets to expenditures
  – Process for drawing down funds
  – Process and authorizations for budget revisions
  – Period of performance and when obligations are made
  – Process for carryover
  – Process for completing the completion reports

• Incorporate state/agency requirements
Internal Controls

- The LEA establishes and implements procedures for ensuring that federal funds are expended according to program requirements, evaluated, and monitored for effectiveness, and that expenditures adhere to Federal Cost Principles as outlined in 2 CFR Part 200, Subpart E.

1. Allocable
2. Allowable
3. Necessary
4. Reasonable

See Title III Program Guide Appendix G!
Supporting Documentation

• The LEA maintains accounting records that are sufficient to permit:
  • Preparation of reports
  • Tracing funds to a level of expenditures
  • Identifying source & use of funds
  • Budgetary control

See Title III Program Guide Appendix G!
Sample Documentation

Tutoring

Inventory

Professional Learning

Time & Effort

Procedures & Processes

Evidence of Effectiveness*

See Title III Program Guide pp. 21-22

6/11/2018
Time and Effort

- Flexibility
- Twice a year OR once a year as detailed in your district’s written procedures
- Supporting documentation is still required
- Individual personnel activity record (PAR) signed by employee or supervisor with knowledge of the work performed
- Group PAR signed by supervisor with knowledge of the work performed
- Time logs can be submitted quarterly or monthly
# Procurement

<table>
<thead>
<tr>
<th>Description</th>
<th>Criteria</th>
<th>Methodology</th>
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<tbody>
<tr>
<td>Micro-purchase*</td>
<td>Up to $3,500</td>
<td></td>
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<td>(2 CFR §200.67, 48 CFR Subpart 2.1)</td>
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<tr>
<td>Small Purchase</td>
<td>Up to $150,000</td>
<td>2 price or rate quotations</td>
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<td>(2 CFR §200.320)</td>
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<tr>
<td>Simplified Acquisition Threshold*</td>
<td>$150,000+</td>
<td>RFP – sealed bids</td>
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<tr>
<td>(2 CFR §200.88, 48 CFR Subpart 2.1)</td>
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*48 CFR Subpart 2.1 (Definitions) – Updated periodically for inflation

- If a micro-purchase is questioned, a review of websites would be sufficient to establish the cost as reasonable. (USDE FAQs on 2 CFR Part 200, Subpart D Question 19, March 17, 2016)

- USDE FAQs on 2 CFR Part 200, Subpart D Question 10, March 17, 2016 states that including vendors who are contractors in writing RFPs limits competition.
Suspension and Debarment

- Non-federal entities are subject to the non-procurement debarment and suspension regulations implementing Executive Orders 12549 and 12689, 2 CFR part 180.

- These regulations restrict awards, sub-awards, and contracts with certain parties that are debarred, suspended, or otherwise excluded from or ineligible for participation in Federal assistance programs or activities.
Suspension and Debarment Cont.

2 CFR 180.220 Procurement contracts included as covered transactions:

• Any contract or subcontract expected to equal or exceed $25,000 must be checked against the System for Award Management (SAM) for suspension or debarment (includes contracted tutors)

• Evidence of the verification can be in the form of a date/time stamped print screen or other digital method that is readily available

• Documentation should include who checked, when it was checked and the query criteria
Suspension and Debarment Website

Search Records

Search Tips to Get Started:
- Looking for entity registration records or entity exclusion records in SAM? Use Quick Search if you know an entity’s Business Name, DUNS Number or CAGE Code. Use Advanced Search to structure your search using multiple categories and criteria.
- Are you a Federal government employee? Create a SAM user account with your government e-mail address and log into SAM before searching to see FOUO information and registrants who chose to opt out of the public search.
- Conducting small business-focused research? In addition to what is contained in SAM, small businesses can provide the Small Business Administration (SBA) supplemental information about themselves. Use the SBA's Dynamic Small Business Search to conduct further market research.
- Trying to find a contractor participating in the Disaster Response Registry? Use the Disaster Response Registry Search to locate contractors willing to provide debris removal, distribution of supplies, reconstruction, and other disaster or emergency relief services in the event of a national disaster.

Choose Quick Search or Advanced Search

QUICK SEARCH:

Enter your specific search term
(Example of search term includes the entity’s name, etc.)

DUNS Number Search: Enter DUNS number ONLY
CAGE Code Search: Enter CAGE code ONLY

SEARCH

ADVANCED SEARCH:
Use specific criteria in multiple categories to structure your search.

ADVANCED SEARCH - ENTITY
ADVANCED SEARCH - EXCLUSION
DISASTER RESPONSE REGISTRY SEARCH

△ SAM.gov will be down for scheduled maintenance Friday, 03/31/2017, from 8:00 PM to Midnight (EDT).
Other Expenditure Items?

See Title III Program Guide pg. 22.

- Additional Compensation?
- Contracted Services?
- Travel Expenses?

For Supporting Documentation see Budget Q & A Chart & 2019 CFM Rubric
Georgia’s Systems of Continuous Improvement
Evidence-based Interventions and Activities

- Documentation should be on file at the LEA to support interventions and activities planned by the district/school.
Quarterly Drawdown Reports

• The DOE Title III team will provide districts with quarterly Title III drawdown reports.

• Ms. Kimberly Lacewell will email the reports to the district contacts.

• Title III Directors should use these reports to monitor timely expenditure of funds.

REMINDER!

• Title III only permits districts to carryover 25% of the Original Title III Allocation. There are no Title III waivers available that would allow districts to exceed the 25%.
Ms. Cori Alston, Program Manager  
[calston@doe.k12.ga.us](mailto:calston@doe.k12.ga.us)  
404.656.2067

## Title III Program Specialists

<table>
<thead>
<tr>
<th>Northeast Region</th>
<th>Mid Region</th>
<th>South Region</th>
</tr>
</thead>
<tbody>
<tr>
<td>Dr. Adria Griffin</td>
<td>Ms. Dely Roberts</td>
<td>Ms. Tammie Smith</td>
</tr>
<tr>
<td><a href="mailto:agriffin@doe.k12.ga.us">agriffin@doe.k12.ga.us</a></td>
<td><a href="mailto:droberts@doe.k12.ga.us">droberts@doe.k12.ga.us</a></td>
<td><a href="mailto:tsmith@doe.k12.ga.us">tsmith@doe.k12.ga.us</a></td>
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<tr>
<td>678-416-1273</td>
<td>470-421-9976</td>
<td>678-794-3667</td>
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<table>
<thead>
<tr>
<th>Northwest Region</th>
<th>ESOL Program</th>
<th>Admin. Assistant</th>
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<tbody>
<tr>
<td>Dr. Meg Baker</td>
<td>Dr. Jacqueline Ellis</td>
<td>Ms. Kim Lacewell</td>
</tr>
<tr>
<td><a href="mailto:mbaker@doe.k12.ga.us">mbaker@doe.k12.ga.us</a></td>
<td><a href="mailto:jellis@doe.k12.ga.us">jellis@doe.k12.ga.us</a></td>
<td><a href="mailto:klacewell@doe.k12.ga.us">klacewell@doe.k12.ga.us</a></td>
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<tr>
<td>678-794-3695</td>
<td>404-463-1858</td>
<td>404-463-0505</td>
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6/11/2018