# TITLE III, PART A LANGUAGE PROGRAM HANDBOOK

For Georgia Title III-A Directors – Updated November 2019

The documents included in this Guidance for Title III, Part A Program Management are intended to provide an overview of the authorizing statute, and not an exhaustive description. This Guidance should be used in conjunction with Georgia's Federal Programs Handbook, Federal Programs Monitoring guidance, Federal Programs Consolidation of Funds Manual, Federal Programs Equitable Services resources on the Ombudsman website, and the U.S. Department of Education guidance. Special thanks are given to all internal and external reviewers, who provided feedback and suggestions.

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## Title III, Part A: Language Instruction for English Learners and Immigrant Students - Overview and Purpose:

*Title III of the Elementary and Secondary Education Act,* as amended by the *Every Student Succeeds Act*, was established with the intent and purpose that children and youth who are English Learners attain English proficiency, develop high levels of academic achievement in English, and meet the same challenging state academic content standards all students are expected to meet.

This guidance is intended for Georgia administrators of supplemental federally funded Title III, Part A[1] Language Programs. Title III, Part A funds may be used to provide supplemental services that improve the English language proficiency (ELP) and academic achievement of English learners (ELs), through the provision of supplemental language instruction educational programs (LIEP), professional learning activities that increase the knowledge and skills of teachers who serve ELs, and language-focused outreach activities toward EL families, parents and communities to enhance and supplement the LIEP. All services provided to ELs using Title III, Part A funds must supplement, and not supplant, the services that must be provided to EL students under Title VI of the Civil Rights Act of 1964 (Title VI), the Equal Educational Opportunities Act of 1974 (EEOA), and other requirements, including those under State or local laws.[2]

Specifically, all schools and school districts or Local Education Authorities (LEAs), including but not limited to Title III-A subgrantees, must provide ELs with effective English language development instruction using state (ESOL QBE/FTE) and/or local funding as required under Title VI of the Civil Rights Act of 1964 and the EEOA. According to these laws all States and LEAs must ensure that ELs participate meaningfully and equally in educational programs and services. **To meet state/local obligations under Title VI and the EEOA, LEAs must**:

- Identify and assess all potential EL students in a timely, valid, and reliable manner;
- Provide EL students with a language assistance program that is educationally sound and proven successful, consistent with *Castañeda v. Pickard* and the Supreme Court decision in *Lau v. Nichols*;
- Provide sufficiently well-prepared and trained staff to support the language assistance programs for EL students;
- Ensure that EL students have equal opportunities to meaningfully participate in all curricular and extracurricular activities;
- Avoid unnecessary segregation of EL students;

- Ensure that EL students who have or are suspected of having a disability under the Individuals with Disabilities Education Act (IDEA) or Section 504 of the Rehabilitation Act of 1973 are identified, located, and evaluated in a timely manner and that the language needs of students who need special education and disability related services because of their disability are considered in evaluations and delivery of services;
- Meet the needs of EL students who opt out of language assistance programs;
- Monitor and evaluate EL students in language assistance programs to ensure their progress with respect to acquiring English proficiency and grade level content knowledge, exit EL students from language assistance programs when they are proficient in English, and monitor exited students to ensure they were not prematurely exited and that any academic deficits incurred in the language assistance program have been remedied;
- Evaluate the effectiveness of a school district's language assistance program(s) to ensure that EL students in each program acquire English proficiency and that each program is reasonably calculated[3] to allow EL students to attain parity of participation in the standard instructional program within a reasonable period of time; and
- Ensure meaningful communication with limited English proficient (LEP) parents.

[1] Title III, Part A includes two types of subgrants to LEAs: EL formula subgrants (See ESEA section 3111 and 3114(a)) and Immigrant children and youth subgrants. (ESEA section 3114(d)).

[2] As recipients of Federal financial assistance under ESEA and other Department-funded grant programs, and as public entities, States and LEAs must also not discriminate against ELs in their educational programs based on race, color, national origin, sex, age, or disability

[3] As further explained in the 2015 EL DCL (*see, e.g.,* page 6), *Castañeda v. Pickard* requires that the program and practices used by the school (as part of the language assistance program) be reasonably calculated to implement effectively the educational theory adopted by the school.

# Title III, Part A: General Grant Information

## Legislative and Fiscal Data

**Identical for both *Title III, Part A: Language Instruction for English Leaners* (EL) and *Immigrant* grants**

Fiscal Year: 7/01/2019 – 9/30/2020
Georgia Department of Education
Title III, Part A Allocations

Federal Agency: U.S. Department of Education
FAIN: S365A190010
DUNS: 806743159
CFDA: 84.365A English Language Acquisition, Language Enhancement and Academic Achievement Program for Limited English Proficient Children

# Title III, Part A Grant Timeline

## Spring

- High EL-population LEAs begin planning in the Systems of Continuous Improvement framework (CLIP and Title III, Part A Program Information and Budget), ensuring EL elements are included across these five systems and appear in the LEA's CLIP.
- Low EL-population LEAs consider forming a consortium with nearby low-incidence LEAs. Fiscal agent/lead LEA initiates with participating members collaborative planning sessions to develop consortium's Title III, Part A initiatives. All consortium members include EL elements in their individual LEA Systems Plans (CLIP).
- If using Logic Model for evidence-based practices, LEAs gather and review data from Title III, Part A language activities for EL students, their families, and their teachers.
- LEAs evaluate the effectiveness of their Title III, Part A Programs.
- LEAs review EL students' progress toward learning English (ACCESS progress to proficiency score) and achieving State standards (GA Milestones Closing the Gap progress).
- LEAs evaluate EL students' needs for the upcoming year and start selecting evidence-based strategies, activities, and interventions to address EL students' needs, as that of their families and their teachers.

## Summer

- USDE announces Title III, Part A state award amount to all states
- GaDOE calculates LEA subgrants based on LEAs' EL student population (drawn from the March FTE EL student count + private schools' EL student counts)
- Small-allocation LEAs are advised of their approximate per-EL allocation to aid in consortium-membership decisions
- Consortia fiscal agent/lead LEAs submit consortium's MOU/agreement to GaDOE Title III, Part A office
- Independent and Consortia LEA subgrant Title III, Part A English learner allocations are presented to the State Board for review and approval
- LEAs continue researching the level of effectiveness (strong, moderate, promising) for proposed Title III, Part A activities, strategies, and interventions
- LEAs design Logic Models to be used for proposed Title III, Part A activities, strategies, and interventions when strong, moderate, or promising research evidence is not available.
- Title III-grantee LEAs participate in Federal Programs Overarching Budget Training Webinar

## Fall

- GaDOE Grants Accounting Unit begins loading funds into GaORS
- Title III-grantee LEAs participate in Title III, Part A Budget Training Webinar
- LEAs ensure all expenditures match the approved budget in order to close the previous fiscal year and prepare the Title IIIA Completion Reports - due **October 30.**
    - LEAs submit final amendments to previous fiscal year Title IIIA budgets.
    - Title IIIA budget amendments may be submitted any time prior to closing the fiscal year – or, if necessary, a fiscal year may be reopened to submit a final amendment and ensure expenditures and budgets match. There is no 25% leeway at the Function or Object level in Title IIIA due to Supplement Not Supplant.
- As district CLIPs are approved, Independent LEAs and Consortia Lead LEAs complete Title III, Part A Program Information and corresponding budget line item descriptions per Title IIIA Chart of Accounts and Guiding Questions for Budget Development tools.
- LEA's Title III, Part A English Learner Budget for the current fiscal year is due **October 1.**
- LEAs ensure EL and Immigrant students are coded correctly in the Student Information System before October FTE Count.

- First FTE Count (1st Tuesday in October) – Title IIIA Immigrant funding is calculated from this FTE Count.
- GaDOE calculates Immigrant funding for eligible LEAs.
- Immigrant allocations are presented to GaDOE State Board of Education.
- After State Board of Education approval, Immigrant funds are loaded by GaORS
- LEAs participate in Title III, Part A Immigrant Budget Webinar
- All LEAs participate in ACCESS Assessment Webinars and trainings along with their District Assessment Director/Coordinator – See GaDOE Assessment's ACCESS for ELLs webpage for more information.

### Winter

- Administer the WIDA ACCESS for ELLs® test to each English learner in the LEA, including those whose parents have waived ESOL services and EL/SWD who may not be receiving ESOL services either, to ensure 100% EL ACCESS Participation Rate
- Prepare for Federal Programs' CFM monitoring, when applicable.

## English Learner & Immigrant Subgrant Allocations

Around July 1 of each year, the U.S. Department of Education (USDE) awards the Georgia Department of Education multiple formula grants, including the Title III Language Instruction for English Learners and Immigrant Students grant. Upon receipt of this grant, the state must calculate each LEA's individual Title III, Part A English Learner and Immigrant allocations. LEAs receive Title III, Part A funding based on a formula described in Title III, Part A statute, Sec. 3111.

The USDE formula first requires states to reserve a portion of the grant for use with Immigrant students. No more than 15% of the Title III, Part A grant may be reserved for this purpose, and due to the fact that the majority of Georgia's immigrant students also receive support under the **English Learner** subpart of Title III, Georgia elects to reserve 5% of its award for this *non-linguistic, socio-cultural integration support* of Immigrant students. This results in 95% of the Title III, Part A funds provided to LEAs being used for the purpose of **language support** and 5% used for **immigrant cultural and social integration activities**.

Language support funding is based annually on the number of English learners reported as "EL=Y" on the March FTE student count plus the total number of ELs in private schools participating in Title IIIA. The total funds to be allocated are divided by the total number of EL=Y students across the state. This results in a per-EL allocation amount –

or per-pupil allocation (PPA). After that, the individual LEA's EL=Y count is multiplied by the per-EL allocation amount. The product is the LEA's Title III, Part A English learner grant award.

Federal regulations [Sec. 3114(b)] require a minimum allocation of $10,000 to receive a Title III, Part A English Learner subgrant. The state publishes the number of EL students needed to meet the $10,000 threshold. LEAs whose EL population is at or above the minimum number of ELs then qualify to receive Title III, Part A English learner subgrants and are referred to as **Independent Title III, Part A LEAs**.

## Forming a Regional LEA Title III, Part A English Learner Consortium

LEAs that do not qualify for an allocation of at least $10,000 may choose to partner with other small EL population LEAs to form a regional LEA **Title III, Part A Consortium**. This is permitted in Title III, Part A law, provided that the total English learner allocation for the LEAs participating in this regional consortium is greater than or equal to the $10,000 minimum award amount.

Thus, LEAs are permitted to create their own consortia. Together, regional LEA Consortium members must qualify for at least a $10,000 allocation to be approved for a grant as a Title III, Part A Consortium. LEAs that wish to combine their allocations must select one member-LEA to act as fiscal agent and lead for the consortium. Like Independent Title III, Part A LEAs, the fiscal agent/lead is permitted to use up to 2% of the consortium's grant for direct administrative costs. The fiscal agent/lead of an LEA Title III, Part A Consortium bears the following responsibilities:

a. Maintenance of the written MOU or agreement regarding consortium members' participation, uploaded to the Consolidated Application as a budget attachment;
b. Submission of the consortium's collaboratively developed Title III, Part A Program Plan, Assurances and Budget (including Amendments) in the Consolidated Application;
c. Ensuring that Title III, Part A funds are shared and spent to fully carry out the Program Plan, benefit all consortium members equally, and ensure fulfillment of Title III, Part A-required activities;
d. Control of all fiscal transactions of the consortium (requisitions, purchases, payments, etc.);
e. Maintenance of records of all inventory lists and financial transactions carried out on behalf of the consortium;

f. Expenditure monitoring of all participating LEAs to ensure compliance with Title III, Part A supplement, not supplant requirements; and
g. Fulfillment of data gathering, reporting and documentation submission requirements, on behalf of the Consortium, for Title III, Part A monitoring and reporting purposes. *(*See **Title III, Part A Monitoring** and **Annual Reporting Requirements**.)

Members of a regional LEA consortium must work closely and collaboratively during each phase of the yearly planning (CLIP, Title III, Part A EL Program Plan, Title III, Part A Budget and Assurances) to ensure that each LEA member's needs are adequately addressed – and then combined and jointly submitted in the consortium's single Title III, Part A EL Program Plan and Budget. For this reason, it is recommended that regional LEA Title III, Part A consortia consist of no more members than can be supported by a single LEA fiscal agent. More than four LEA members in a consortium may prove challenging to the fiscal agent from the standpoint of coordination of effort and data reporting. *(See **Appendices A** and **B** for sample LEA consortium forms and guidance.)*

The GaDOE considers consortium memberships finalized by **July 1** of each year. It is important to note that requests to join or exit a consortium will not be accepted after **July 1,** except in the case of an LEA choosing to exit the consortium because their final allocation was $10,000 or more and suddenly they could be an independent LEA.

## Title III, Part A EL Program Requirements

All Independent Title III, Part A LEAs and members of regional Title III, Part A consortia must adhere to several general requirements of the law as well as perform the three **Required Subgrantee Activities** described in Title III, Part A, **Sec. 3115(c).**

### General Assurances

1. The LEA assures compliance with the 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)]
   *Please see the statewide standardized EL Entrance and Exit Procedures outlined in the EL Language Programs – State Guidance document on the ESOL Language Program website.*
2. The LEA assures compliance with Sec. 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)].
4. The LEA assures that it annually assesses the English proficiency of all English learners participating in a program funded under this subpart, consistent with section 1111(b)(2)(G);
5. 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)]
6. **Beginning 2020-2021**: The LEA assures that it has selected one or more methods or forms of *effective* instruction to be used in Title III-funded programs and activities to assist EL students attain English proficiency and meet challenging state academic standards. [Sec. 3115(f)(1)]
7. 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)]
8. 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)]
9. 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]

## Required Activities

Portions of the Title III, Part A subgrant must be used for each one of the following activities required in Title IIIA statute, under the ESSA:

1. Provide *effective,* **supplemental language instruction educational programs** that **demonstrate success** in increasing EL students' English proficiency and content achievement. [See Section 3115(c)(1)]

2. Provide *effective* professional development (PD) for **teachers, administrators and other school personnel**. This PD must:
    a. Be designed to **improve the instruction and assessment of ELs**; and

b. Be designed to **enhance participants' ability** to understand and implement curricula, assessment practices and instructional strategies for ELs; and
c. **Prove effective** in increasing ELs' English proficiency ***or*** substantially increasing participants' subject matter knowledge, teaching knowledge or teaching skills; and
d. **Be of sufficient intensity and duration** to have a positive and lasting impact on teachers' performance in the classroom. **[**See Sec. 3115(c)(2)]

3. Provide and implement **parent, family and community engagement activities that enhance or supplement the Title III, Part A-funded language activities/programs**. This may include strategies that serve to coordinate and align related programs. [Section 3115(c)(3)]

## Authorized English Learner Activities

Due to the limited size of Title III, Part A allocations, most LEAs will expend the entirety of their funds on the fulfillment of the three required subgrantee activities. Should some Title III, Part A funds remain unencumbered after developing a needs-based program plan based on the three required activities, LEAs are authorized to undertake additional specific activities. These include upgrading program objectives, improving ELs' instructional program, providing ELs with tutorials and intensified instruction, developing and implementing effective Pre-K language programs, providing outreach programs and family literacy services, improving EL instruction – including ELs with special needs – by providing supplemental technology or access and offering programs or courses designed to help ELs achieve success in postsecondary education. [See Sec. 3115(d)]

## Coding English learners as Title III-served in the LEA's Student Information System (SIS).

- For federal reporting purposes as required under the ESEA/ESSA, all English learners who are receiving Title III supplemental language services must be coded in the LEA's SIS as Title III-served.
- Only English learners who are receiving District-provided core ESOL language instruction services are eligible to receive supplemental Title III language services as well.
- EL students whose parents have opted out of the district-provided core ESOL language program, or who are not receiving ESOL language instruction segments of services for other reasons, <u>are not eligible</u> to receive Title III supplemental language services either and **must not be** coded as Title III-served in the District's SIS. See Section 13, p. 7, of the *January 2019 Addendum to September 23,*

*2016 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).*

## Consolidating Federal & Local Funds

All Federal Programs information concerning the consolidation of Federal and local/state funds is available to schools and school districts (LEAs) on the Consolidation of Funds website. Please refer to those resources first. The information below is simply a summary of the information in the Consolidation of Funds (CoF) Manual.

A sample of Title IIIA Intents and Purposes Statements can be found in the Intents & Purposes Sample on the CoF website. Even though these sample statements are repeated on the next page, LEAs who are consolidating federal and local/state funds are expected to follow the COF guidance, templates, and resources found on the Federal Programs Consolidation of Funds website.

### Title IIIA EL & Immigrant Intents & Purposes Statements

| Programs | Brief Summary of Purpose | SAMPLE Ways to Meet Purpose | Examples of Monitoring Documentation that would support Intents and Purposes |
|---|---|---|---|
| **Title III, Part A English Learners** | To assist English learners to attain English proficiency and develop high levels of academic achievement by (1) providing effective *supplemental* English language instruction to select EL students based on need **and** (2) providing effective EL-focused professional learning for all staff (teachers and school leaders) **and** (3) providing language-focused outreach programs for EL parents and families. | • Extra English language support to select EL students based on need<br>• English language instructional software programs<br>• After- or before-school or summer tutorial language-focused programs<br>• Language-focused training (stand-alone or embedded)<br>• EL-focused book studies in PLCs<br>• EL math specialist<br>• Data analysis to design language programs<br>• Language programs' curriculum mapping/development<br>• Instructional coaching<br>• Literacy classes for non-English-speaking parents<br>• EL parent training meetings on how to support English development of children at home | • Agendas (PL & parent)<br>• Attendance rosters for tutorials, with EL students highlighted<br>• Coaching Logs<br>• Data analysis documentation (pictures, charts, spreadsheets, etc.)<br>• Invoices with Title IIIA intents/purposes highlighted<br>• Job Descriptions<br>• Observation records<br>• PPTs (PL & parent)<br>• Products from PLCs<br>• Sign-In Sheets (PL & parent)<br>• Stipend Agreements<br>• Any other relevant documents |
| **Title III, Part A** | Based on an assessment of | Any of the above and/or any of the following: | Same as above, and/or… |

| | | | |
|---|---|---|---|
| **Immigrant Students** | immigrant students' unique needs, to assist immigrant children and youth (both ELs and non-EL immigrants) attain English proficiency (when applicable) and develop high levels of academic achievement. | • Diversity training for teachers & staff<br>• Recruitment of personnel specifically trained to provide services to immigrant students, such as tutoring for high school immigrant students.<br>• Mentoring and/or academic or career counseling for immigrant students<br>• Programs of introduction to U.S. school system and civics education for immigrant students and their families<br>• Identification, *development*, and acquisition of curricular materials, educational software, and technologies<br>• Sociocultural adaptation activities for immigrant students and their families<br>• Introduction to and providing community services for immigrant families (can be in coordination with community-based organizations/institutions)<br>• Family literacy, parent *and family* outreach, and training activities designed to assist parents *and families* to become active participants in the education of their children; | • Community services flyers, newspaper articles, etc.<br>• Family activity flyers, promotional materials, etc.<br>• Special program flyers, materials, etc.<br>• Attendance rosters for tutorials, with Immigrant students highlighted<br>• Counselor mentoring schedules<br>• Event schedules, community calendars, etc.<br>• Any other relevant documents |

## Allocating Title IIIA Consolidated Funds to Schools

Federal regulations require that each LEA consolidating federal and local funds in Fund 150 must document how the schoolwide plan (SWP) and Fund 150 budget meet the ***Intents & Purposes*** of each federal program consolidating. Please refer to the Consolidation of Funds (CoF) Manual for all requirements of LEAs consolidating local, state, and federal funds.

When a first year CoF LEA submits a Title IIIA budget, documentation from sample high EL-population schools will be reviewed to determine how the Intent & Purpose statements align or match with the SWP activities and are funded in the corresponding Fund 150. These documents should provide sufficient information to demonstrate how schools across the district are meeting the intent & purposes of Title IIIA in the three district-level required areas for activities: supplemental EL student language instruction

activities, EL-focused professional learning for teachers of ELs, and language-focused outreach activities to parents of EL students. These requirements are at the district, not school level. (Please review the Consolidation of Funds (CoF) Manual.)

### *Title IIIA EL & Immigrant Program Plans*

The LEA must also answer Questions #1 and #5 in the budget **EL Program Plan** (or Immigrant Program Plan, when applicable) which includes a description of the LEA's OCR-required language program and a description of how the LEA will ensure that elementary and secondary schools receiving Title IIIA funds assist English learners in (A) achieving English proficiency based on the State's English language proficiency (ELP) 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 (B) meeting the challenging State academic standards; family and community engagement in the education of English learners [See Section 3116(b)(2)].

Since the Title III, Part A subgrant is allocated to an LEA and not to individual schools, it is important that the LEA **in collaboration with the school leaders** identify the characteristics and needs of the English Learners in each school to determine how best to allocate the consolidated funds in order to meet these needs. An LEA would want to consider distributing the Title III funds at different percentages to each school, since each one has a different set of English Learners with a different set of needs.

### *Allocating Title IIIA funds to Non-Consolidating Schools*

First, the LEA must set aside Title IIIA funds for non-Title I schools that have English Learner students. Schools that are not consolidating federal funds would use their Title III funds to provide one of the following, as needed: [See Sec. 3115(c)(1-3)]

(1) Supplemental language instruction for those EL students who need it (ALL EL students should already be receiving ESOL language services.)
(2) EL-focused PD for all teachers and school leaders
(3) Language-focused outreach activities for EL parents that supplement and enhance (#1) above.

### *Comprehensive Needs Assessment*

Secondly, the LEA will want to determine which Title I schools have greater need for supplemental language services for their EL students. For instance, school leaders could prepare a chart or graph showing the characteristics and needs of the English Learners, their teachers and their families in each school which could help determine which schools need more Title IIIA funds and which need less.

***Chart 1:*** *Example: Comparing English Learner Data across Schools*

| | **Number & Percentage of ELs at each Proficiency Level Source: SLDS Data** |
|---|---|

| Name of School | School level (Elem, Mid, High) | EL Pop. & Share of Pop. | ACCESS Level 1 | ACCESS Level 2 | ACCESS Level 3 | ACCESS Level 4 | ACCESS Level 5 | # of ESOL Endorsed Teachers | # of EL-focused PD opportunities last year |
|---|---|---|---|---|---|---|---|---|---|
| | | | | | | | | | |
| | | | | | | | | | |
| | | | | | | | | | |

Additional information could be used to inform these decision-making processes; such as,

- Number of Students with Limited or Interrupted Formal Education (SLIFE)? _____
- Number of Newly arrived English Learners? _____
- Number of English Learners with Disabilities? _____
- How are the EL students doing on GA Milestones in each school?
    - In which grade level or subject matter do the EL students need more support? _____
    - CCRPI Closing the GAP – EL performance flags? _____
    - CCRPI Academic Achievement – EL subgroup performances? _____
- What is the **EL Exit Rate** at each school? _____
- What is the EL Progress toward Proficiency Score for each school? _____ (CCRPI Progress Indicator)
- What is the ESOL language program already offering for EL students at each school?
- How are Title I funds already being used to support English Learners progress toward English and academic proficiency?
- What are the EL parents' and families' needs? How are Title I funds already being used to support these needs?
- Who are the Immigrant students at each school?
    - What are their needs? Academic? Cultural adaptation? Linguistic?

After the information and data have been reviewed, school leaders will be able to identify schools with greater need for Title IIIA funds – funds to specifically help EL students learn academic English in order to be successful in school. The following characteristics are listed from greatest to least with regards to increasing students' risk for failure in school based on not being proficient in the language of instruction and assessment – English.

- Research shows that it takes, on average, 3-5 years to learn English as a 2nd language and 5-7 years to learn academic English – if there are no extenuating circumstances or characteristics as in the list in Chart 2.

***Chart 2:*** *List of EL Characteristics & other Factors that Increase Students' Risk for Failure in English-only Schools*

| |
|---|
| 1. Newly arrived and/or immigrant status |
| 2. Interrupted or limited or no formal prior education |

3. Undiagnosed learning difficulties/differences/disabilities
4. Students' previous experiences/background
   (Refugee from war-torn area? Emotional/social instability? Poverty? Health issues? Etc.)
5. Students' AGE factors –
   a. Overage for grade-level? Adult?
   b. Number of years left for student to learn English before aging-out of school
6. Students' grade level – Number & complexity of state academic standards to meet (Amount of English required increases at each successive grade level)
7. Students' literacy level in primary language
8. Number of years EL students have been in the ESOL Language Program
9. Teachers' & school leaders' professional qualifications to meet EL students' needs
10. Teachers' & school leaders' level of cultural proficiency
11. Students' primary language distance from English
    (Does primary language have a written code like English? A similar sound system? Etc.)

### *In what kind of schools would an LEA consider allocating more Title III funds?*

- Example: A Title I schoolwide high school or middle school with a large number and percentage of EL students who are either newly arrived immigrants with interrupted or limited prior formal education or may have suspected learning differences and have been in the ESOL program since Kindergarten.
- Example: Schools with high EL populations and low number of staff professionally qualified or with capacity to meet the needs.

### *In what kind of school would an LEA consider allocating less Title III funds?*

- Example: In a primary school where the majority of the English Learners were born and raised in the U.S., attended U.S. since PreK or K, and who may be Generation 2.5 (Grandparents were 1st-time immigrants), who are doing well in school compared to their English-only peers, who are showing progress on the ACCESS, and who are being promoted, not placed each school year.
- Example: Schools with low EL populations and most of the staff has the professional qualifications and capacity to meet the needs.

**NOTE:** There is NO poverty allocation methodology for allocating Title III, Part A funds to schools.

## Intent and Purposes Statement for each Consolidating School

- LEAs attach an *Intents & Purposes* statement for each school to the Fund 150 General Attachments Tab in the Consolidated Application (ConAPP), along with the school budgets.
- Title III Specialists review each consolidating school's *Intents and Purposes* Statement to be sure it aligns with Title IIIA required activities in Sec. 3115(c)(1-3) and the Purposes for which Title IIIA is allocated to LEAs described in **Sec. 3102 (1-5).**

## School Improvement Plan (SIP) for each Consolidating School

- Title III Specialists review each consolidating school's School Improvement Plan (SIP/SWP) in the manner explained in the Consolidation of Funds (CoF) Manual.
    - To make sure they align with the Intent & Purposes statements.
    - To make sure the plan addresses the language needs of English Learners, the EL-focused PD needs for their teachers and school leaders, and the language and cultural needs of their families.

## Fund 150 Budget for each Consolidating School

- When an LEA is consolidating funds, Title III Specialists will review the school Fund 150 budgets in the manner explained in the Consolidation of Funds (CoF) Manual.
    - To see how they align with the Intent and Purposes statements
    - To see how they align with the school budget
    - To see how budgeted items benefitting English Learners, their teachers and their families compare with the EL population for that school and the total proportionate share of Fund 150.
    - To be sure they have a budget for state and local funds, i.e. a budget for their state funded ESOL language program.
- The Title IIIA Program Specialist will contact the CoF state Manager if it is unclear how the school plans to address its Intents & Purposes statements; for instance, if there is no reference to budgeted items for language acquisition, PD, and parent outreach activities.
- The Title IIIA Program Specialist will complete a CoF Budget Worksheet to submit to Federal Programs and the LEA when the CoF budget needs revision.

## LEA Title III-A Budget (Both EL and Immigrant)

The Title III, Part A EL and Immigrant Budgets require a line item for each school (under 1000/881) with a notation in the budget line description that say, "Transferred to Consolidation of Funds". There should be a clear alignment between each school's Intents and Purposes, Schoolwide Plan, Fund 150 Budget in the manner explained in the Consolidation of Funds (CoF) Manual.

## Consolidated Carryover Funds

LEAs have 27 months in which to expend Title IIIA funds; the first 15 months are considered the initial "period of performance" or availability – from October 1 to the following Sept 30, including 90 days before Oct 1 (i.e. July-Sept) if desired. After that, the LEA may "carry forward unobligated balances to subsequent periods of performance" [2 CFR §220.308(d)(3)]**.** Funds that are not obligated in the 15-month period of performance, remain available for obligation in the succeeding fiscal year as

"carryover" funds. LEAs submit a Grant Completion Report to Grants Accounting to close-out the initial 15-month grant period.

When an LEA is notified of carryover funds, the LEA should consider allocating the additional funds **first** to the schools with the greatest EL student need, per the comprehensive needs' analysis described in the previous section "Allocating Consolidated Title IIIA funds".

When **changes** are made to the budget the LEA should contact the Title III Specialist to review the changes and ensure the budget still meets the *Intents and Purposes* of Title III, Part A. "LEAs are required to report deviations from budget or project scope or objective and request prior approvals from Federal awarding agencies for budget and program plan revisions, in accordance with this section" [**2 CFR §220.308(b)].**

- Examples of changes:
    - An after-school language program or supplemental language tutoring during the day was in the original *Intents & Purposes* statement. If these activities are removed from the budget, then the LEA would not be meeting the original Intent and Purposes for consolidating funds.
    - Several EL-focused PD opportunities were originally planned but never actually offered.
    - The school decides not to purchase the language software programs as planned.
    - Parent literacy services were implemented in a different school.
- Changes in the budget can also affect the percentages applied to each program in the consolidation. When budget revisions are made, the percentages to each program are subsequently changed. These new percentages will affect all purchases from the beginning of the fiscal year. See Consolidation of Funds (CoF) Manual.

Please see the Consolidation of Funds (CoF) Manual on the Consolidation of Funds website for detailed information.

# Title III, Part A: Immigrant Children & Youth Subgrant

## How Immigrant Subgrant Allocations are Determined

Per Title III, Part A law, a reservation of funds is made to provide cultural and social supports to students identified as immigrants. In Georgia, the amount reserved is 5% of the overall state Title III, Part A grant.

The definition of *immigrant* under Title III, Part A law is unique. A student is considered by Title III, Part A to be an immigrant if he/she meets three (3) 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

In the LEA's Student Information System (SIS), LEAs report their immigrant population to the state during the October FTE count using three data elements: the student's birth country, date entered U.S. schools, and, the use of an immigrant flag. The immigrant flag is a data element used to identify immigrant students who have not been in U.S. schools for more than three years (or 36 cumulative calendar months) due to a break or gap months/years in the student's enrollment in U.S. schools, even though the date they entered U.S. schools was more than three years ago. This may require a review of enrollment records.

When the state or the LEA runs a report of foreign-born students by date entered U.S. schools, a student with a break in enrollment or several months or a year of non-enrollment in U.S. schools would not be captured in this report. However, LEAs with knowledge of the student's enrollment gaps will flag the student as an immigrant using the immigrant flag in their SIS, thus allowing the state to capture these students who still qualify as immigrant.

It is important for LEAs to establish procedures that require personnel to review students with the immigrant flag in September each year to determine whether the immigrant flag is still accurate. If the student has completed the "three years in U.S. schools" since the last immigrant student count, the LEA would remove the immigrant flag prior to October 1st to ensure an accurate immigrant count for the October FTE report.

All students who entered U.S. schools beginning September 1 three years prior to the immigrant count year will automatically qualify as immigrant students for the October immigrant student count. In addition, all students flagged as immigrant students by the LEA will automatically be counted by the state as immigrant students. Therefore, it is incumbent on the LEA to ensure that immigrant student's with gaps in enrollment are

flagged, and that the flag is removed when the three years or 36 cumulative calendar, not school, months is complete.

LEAs qualify for the Title III, Part A Immigrant subgrant if they show a *significant increase* in Immigrant student enrollment. Per law, this increase must be measured against the previous two years' average. For example, if in 2017 an LEA enrolled 104 qualified immigrant students (see above for definition of *immigrant*) and in 2018 it served 111 immigrant students, its two-year average is 58. To receive an Immigrant grant in 2019, it must show a *significant increase* (defined at 10% increase in Georgia) from the previous two-year average. Title III, Part A requires that the increase in immigrant students be significant and the grant award be of sufficient size and scope to allow the recipient LEA to build future capacity to serve its immigrant population.

In Georgia, an LEA *may* qualify for an Immigrant subgrant if, based on the October FTE **count**, its most recently reported immigrant student population is 50 or more. If this is the case, the GaDOE calculates whether the LEA's current population constitutes a *significant increase* over the previous two-year average. If the current Immigrant count represents an increase of 10% or more over the previous two-year average, the LEA then qualifies to receive an Immigrant grant. *(See **Appendix C** for more details on Immigrant subgrant calculations.)*

The total Title III-A Immigrant portion is divided by the total current year Immigrant student population (counted in October FTE) in the qualifying LEAs to calculate a per-Immigrant student allocation. LEAs receive a Title IIIA Immigrant subgrant equal to the current number of Immigrant students multiplied by the state's per-Immigrant student allocation amount (PPA – per pupil allocation).

The Title III-A English Learner $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 receiving an EL allocation; and to receive a smaller Title III, Part A Immigrant allocation.

### Authorized Immigrant Activities

LEAs awarded Immigrant subgrants must use the funds to pay for activities that provide supplemental instructional opportunities for immigrant children and families. *It is important to note that **student language instruction** is **not** the purpose of the Title III, Part A Immigrant subgrant.* English learner grants support English language instruction, whereas Immigrant grants provide cultural and social supports.

LEAs must use Immigrant awards for one or more of the following activities as outlined in Section 3115(e):

- Family literacy, parent and family outreach and training designed to assist caregivers in becoming active participants in their child's education
- Recruitment of and support for personnel who have been specifically trained to provide services to immigrant students
- Immigrant student tutorials, mentoring and academic or career counseling
- Instructional supplies or transportation costs that are *directly attributable to the presence of immigrant students* in the LEA
- 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
- Offering comprehensive community services in coordination with entities that have expertise in working with immigrants
- Curricular materials, educational software or technology that supports the instructional or community services provided by this grant for immigrant students and families

## Consolidated Application, Part 1: The Comprehensive LEA Improvement Plan (CLIP)

The needs of English learner and Immigrant students should be addressed in the LEA's Consolidated LEA Improvement Plan (CLIP), just as any other subgroup, regardless of whether the LEA is receiving a Title IIIA subgrant or not. See the Federal Programs' Handbook and CLIP guidance for more information. Whether the LEA chooses to submit an S-CLIP or an online SLDS CLIP, several important elements must be present.

1. LEAs must include an ESOL teacher and/or ESOL Coordinator or Title IIIA director and parents of ELs in the CLIP decision-making processes. In the S-CLIP, the LEA must describe how EL teachers and parents of ELs were engaged in these processes. (See Sec.3116(b)(2)(C) and Title IIIA assurances.)

2. LEAs must describe the Strengths and Challenges of their EL Language Program – whether just an ESOL language program, or both an ESOL and a supplemental Title I/Title III EL Language Program. This description must be based on an analysis of English language proficiency (ELP) data and academic achievement data of English learners such as data found in CCRPI Progress toward proficiency ACCESS data and Closing the Gaps GA Milestones data. Other data may be used to inform the strengths & challenges section, such as demographic data, formative or LEA-gathered data, and perception data.

3. When determining root causes and identifying goals and action steps in the District Improvement Plan (DIP) of the SLDS CLIP, LEAs may want to address root causes directly affecting EL student progress towards English proficiency and/or academic achievement. If action steps are marked as Title IIIA action steps in the CLIP, these must be related to the three required activities in Title IIIA, i.e. must be Title IIIA-allowable.

## Consolidated Application, Part 2: Title III, Part A Program-Specific Elements

In order to receive any federal Title III, Part A funding, LEAs must complete an English Leaner (EL) Program Plan annually. The LEA must provide details of how the LEA is fulfilling the federal requirements of the core English language program (ESOL) and assuring the needs of ELs are met. The LEA Title III, Part A Plan includes elements found in the CLIP and the EL Program Information Tab (sometimes called the budget worksheet).

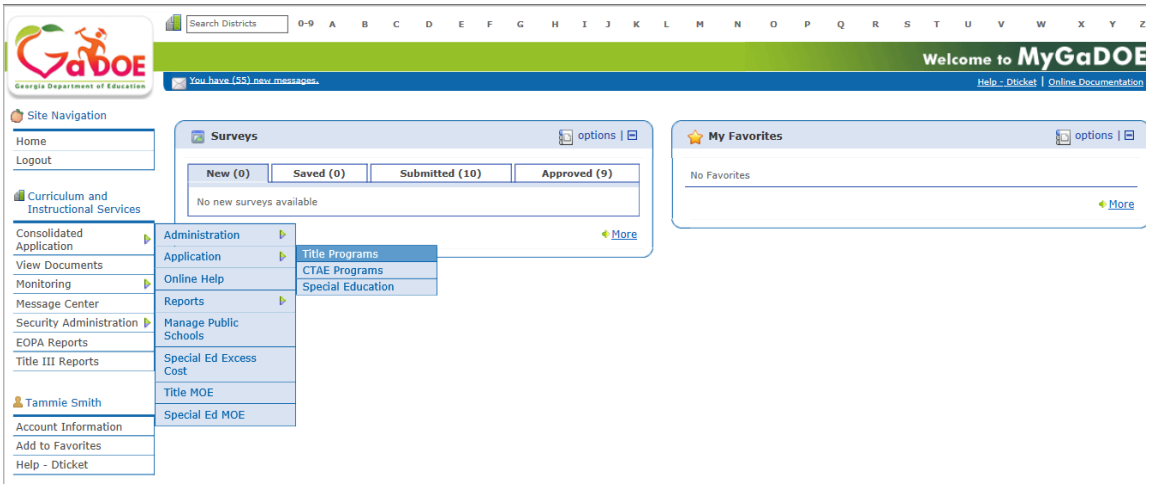
## General Title III, Part A Assurances

The Title IIIA assurances (see pp. 9-10) are included as a component of the online consolidated application (MyGaDOE portal) and must be accepted by the LEA superintendent prior to submission to the GaDOE, as part of the budget review/approval process to receive a Title III, Part A subgrant. This applies to all Independent Title III, Part A LEAs and LEAs acting as Lead Fiscal Agent for a regional LEA Title III, Part A consortium.

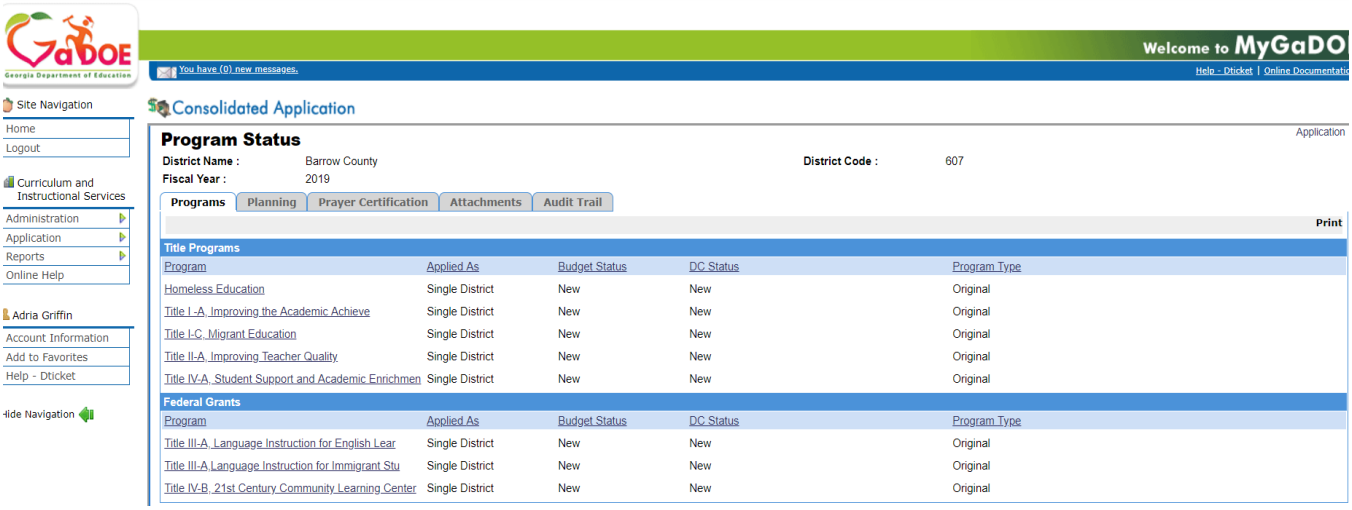
## Accessing the Title III, Part A Components of the Consolidated Application

1. Access the Consolidated Application using your personal login at the following link https://portal.doe.k12.ga.us/login.aspx

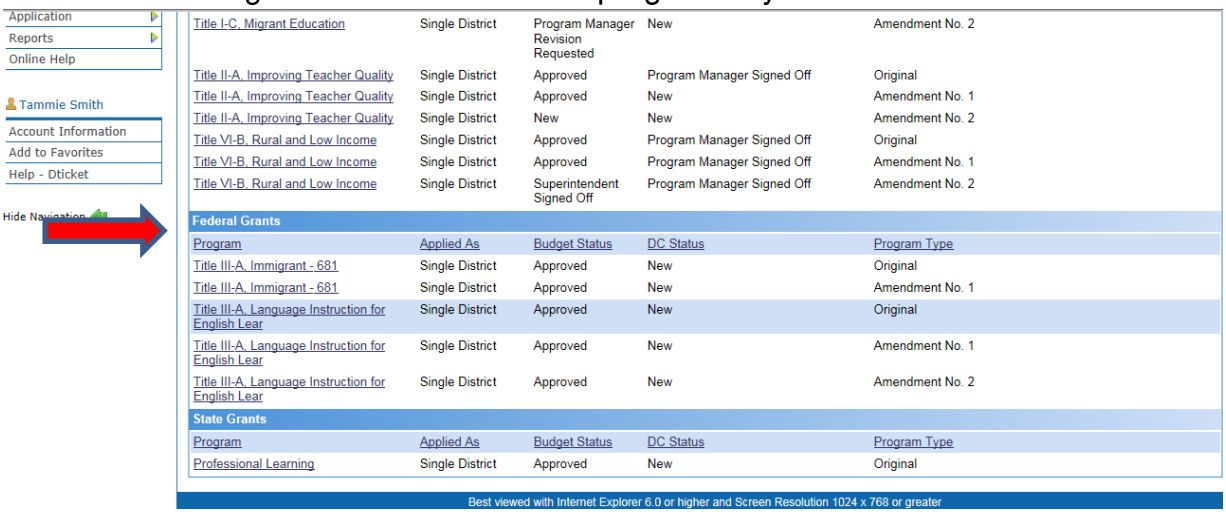
2. Click Consolidated Application>Application>Title Programs




3. Click on your district's name in the Application List. This will open the district's Programs page.

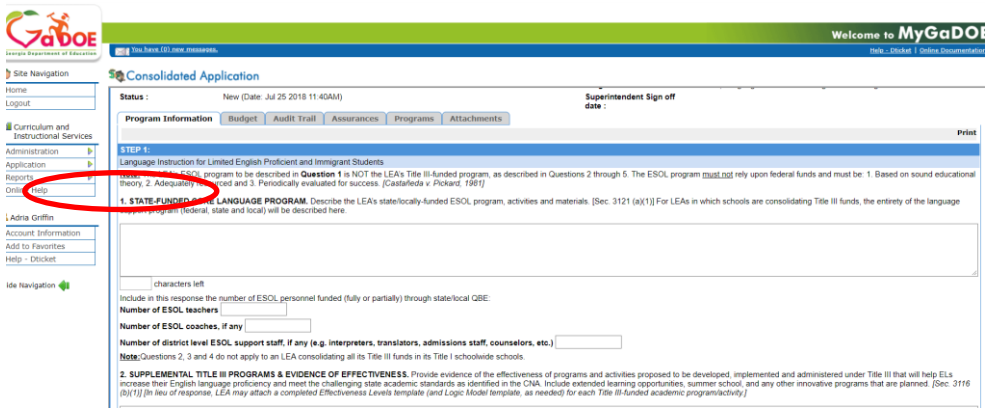



4. Using the drop-down menu to add programs, select *Title III, Part A Language Instruction for English Leaners* to add the program to your list.




5. Open the program tab by clicking on *Title III, Part A Language Instruction for English Learners*

6. Within the Title III, Part A page click the tab titled *Program Information.*



7. Use the text boxes provided to respond to each of the five questions. However, questions #2 & #3 do not apply to an LEA consolidating all its Title III, Part A funds in its Title I schoolwide schools and Question #5 only applies to LEAs distributing Title III, Part A funds directly to elementary and/or secondary schools. If a question does not apply to your LEA, please enter N/A in the text box.

## Completing the Title III, Part A Program Information

The LEA's EL Program Information is reviewed during the budget review/approval process, in addition to elements of the CLIP, to ensure that the LEA plans to provide supplemental, effective language instruction educational programs (LIEPs), effective EL-focused professional learning and effective EL parent/family engagement activities to supplement/enhance the LIEPs [See Section 3115(c)(1)(2)(3)].

The EL Program Plan questions are as follows:

1. 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, Part A funds, the entirety of the language support program (federal, state, and local) will be described here.)

2. Provide evidence of the effectiveness of programs and activities proposed to be developed, implemented and administered under Title III, Part A 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)]. This question does not apply to an LEA consolidating all its Title III, Part A funds in its Title I schoolwide schools.

3. 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)]. This question does not apply to an LEA consolidating all its Title III, Part A funds in its Title I schoolwide schools.

4. 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)]. This question does not apply to an LEA consolidating all its Title III, Part A funds in its Title I schoolwide schools.

5. 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)]. This question only applies to LEAs distributing Title III, Part A funds directly to elementary and/or secondary schools.

## Supplement Not Supplant in Title III, Part A

The LEA Title IIIA Director must oversee, manage, and monitor its Title III, Part A expenditures to ensure that the funds are used to supplement, and not supplant, state, local, and other federal funds. The GaDOE Title III, Part A Language Program verifies compliance with this requirement during onsite and desktop Federal Programs' Cross-functional monitoring of Independent Title III, Part A LEAs and Regional Consortium Lead LEAs.

It is important to note that the often-discussed provision in Section 1118(b) of the ESEA setting forth requirements for a **Title I** R/AMP methodology does not apply to Title III, Part A. **Title III, Part A statute** specifically prohibits supplanting of other Federal, State, and local funds, and this provision was not changed by the ESSA. (See Section 3115(g) of the ESEA).

**Title III, Part A Sec. 3115(g) SUPPLEMENT, NOT SUPPLANT**. – "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."

In general, it is presumed that supplanting has occurred:

1) if the SEA or LEA uses Federal funds to provide services that the State Educational Agency (SEA) or LEA was required to make available under other laws; or

2) the SEA or LEA uses Federal funds to provide services that the SEA or LEA provided with non-Federal funds in the prior year. See OMB Compliance Supplement, Department of Education Cross-Cutting Section, Part 4, Section 84 Section III.G.2.2, at 4-84.000-16, *available at* https://www.whitehouse.gov/wp-content/uploads/2018/05/2018-Compliance-Supplement.pdf.

Therefore, just as prior to enactment of the ESEA, as amended by the ESSA, Title III, Part A funds cannot be used to fulfill an LEA's obligations under Title VI of the Civil Rights Act of 1964 and the Equal Educational Opportunities Act (EEOA).

### What Must Title III Funds NOT be used for?

See *September 26, 2016, Nonregulatory Guidance: English Learners and Title III, Addendum Selected Topic 6*: Because section 3113(b)(2) of the ESEA requires a State to implement statewide exit procedures, a student who meets the exit procedures is no longer an EL for ESEA purposes, and the State may no longer use Title III funds for services for that student. This includes services for monitored EL students (those coded as EL=1 and El=2).

## Title III, Part A Budgeting

### Budget Timeline

Please follow the Federal Programs Budget Submission Timeline found in the Federal Programs Handbook

- August 1 – Budget Submission is Open, once LEA CLIP is approved
- July 1 – Fiscal Year Begins
- September 30 – Fiscal Year Ends (15-months following the July 1 opening)

### Budget Training

The GaDOE Title III, Part A Program Specialist Team provides LEAs with budget training via webinars scheduled during the month of **August**. Additionally, the Title III, Part A Language Program has developed several budget-building resources, such as the *Chart of Accounts* and *Guiding Questions Budget Chart* which are included in **Appendices E** and **F**. The *Budget Guiding Questions* Chart will assist LEAs in determining the allowability, allocability, reasonableness, and necessity of expenditure items. The chart also may act as a budget review checklist to ensure all Function & Object Codes are correctly attributed. Adhering to budget guidelines and verifying complete and correct accounting *prior to* submission, greatly supports the budget review/approval process.

### Supporting the EL Budget in the CLIP and Program Information Tab

Georgia's Systems of Continuous Improvement framework was designed to support LEAs' need for flexibility in using federal funds to supplement state and local funds to better meet the individual needs of their student population. Therefore, it is expected that EL-related needs will be addressed where applicable in the CLIP and that Title III, Part A funds may be used as source funds for EL-related action steps. Including ELs in Title III, Part A-allowable *Action Steps* and *Supplemental Supports* provides context and rationale for related expenditures found in the Title III, Part A Budget.

## Developing the Budget

The following section provides answers to many frequently asked questions related to Title III, Part A EL & Immigrant Budgets. Please feel free to contact the Title III, Part A Regional Program Specialist assigned to your LEA if you have any questions that are not addressed on the following pages.

### *Federal Cost Principles*

The LEA's Title III, Part A Budget must only include items that comply with the four Federal Cost Principles: **allowable, allocable, reasonable and necessary**. The burden of proof resides on the LEA to provide evidence of such. Portions of the Uniform Grant Guidance related to these requirements are provided for your review in **Appendix G**.

**Note: Title III, Part A will follow Federal Programs guidance for determining reasonableness of expenditures.** (See the Federal Programs Handbook)

For example, costs for additional compensation to employees working outside their contractual hours should adhere to the District's Federal Programs pre-determined hourly wage for such activities. Typically, an hourly wage for off-contract work is calculated as the employee's state salary hourly wage without the local supplement.

### *Federal Programs Chart of Accounts*

The Title III, Part A Budgeting Tools - *Chart of Accounts* has been created for you directly from the state Chart of Accounts. (See the Title III, Part A website or **Appendix E**.). The Function and Object Codes found in the Title III, Part A *Chart of Accounts* will be those made available for use in the Consolidated Application.

If you are contemplating a budget item that does not align to any of the Function and Codes provided in the Title III, Part A *Chart of Accounts*, please contact your Title III, Part A Regional Program Specialist to learn whether a new function/code may be added.

### *Functions, Object Codes, & Line Item Descriptions*

- Use the appropriate Function & Object Codes per the state Chart of Accounts
- Follow the Title III, Part A *Chart of Accounts* (**Appendix E**)
- Provide as much detail as possible in the line item descriptions. See Guidance Questions Chart and Common Errors listed below.
- Include the level of effectiveness (strong, moderate, promising, or logic model) for any item purchased under Function Codes 1000, 2100, 2210, and 2213.

### *Direct Administrative Expenses – 2% Cap*

Title III, Part A law allows LEAs to expend no more than 2% of the subgrant on direct administrative expenses. [Sec. 3115(b)].

- To ensure school districts use the maximum percentage for direct administrative expenses allowed in Title III, Part A, the LEA may set aside 2% of the original allocation for this purpose.
- The *Federal Programs Handbook*, p. 43, provides a table showing each federal program's maximum percentage for Administration. These percentages represent the maximum set aside amounts allowed by each program.
- Please remember to "round-down" when calculating the allowable 2% administrative costs, instead of using traditional mathematical practices of rounding up; since Title IIIA statute limits the administrative costs to 2% of the original allocation.
- All expenditures in Function # Codes 2230 and 2300 (not to include indirect costs) should be calculated in the 2% Direct Administrative Cost.

### *Indirect Costs*

Although not required, under the ESSA, LEAs are permitted to charge the Title IIIA subgrant a portion of the school district's indirect costs to run the program, when these are reasonable for the size of the allocation and the required activities that must be implemented. The LEA must use the district's negotiated Indirect Cost Rate as published on the Title I, Part A Other Resources website and the Indirect Cost worksheet published on the Title IIIA Program Management Guidance website under *Budget Development Tools.*

### *Evidence-based Practices –*

The Federal Programs Handbook, Overarching Requirements, Chapter 9, is the best source to understand the new ESSA requirements for demonstrating the effectiveness of federally funded activities, strategies, and interventions. LEAs must abide by the principals and processes established in this guiding document found on the Federal Programs website.

Under the ESSA, LEAs must identify the level of effectiveness for activities, strategies and interventions budgeted in Functions 1000, 2100, and 2210/2213. If the LEA cannot find a strong, moderate, or promising level of effectiveness for an activity, strategy, or intervention, a Logic Model may be designed and implemented instead to collect effectiveness data. Templates for LEA use can be found on the Federal Programs website and the Title IIIA Program Management Guidance website.

## Common Budgeting Errors:

Lack of consistency

- If a salary or proportion of a salary is in the budget, ensure that the benefits and tools or supplies for the position align proportionally.
- If substitutes are in the budget, ensure their benefits are also in the budget and vice versa.

Lack of specificity

- Specify conferences to be attended, curricula, book titles, etc. to be purchased, vendor names, etc. to ensure they are English language focused.
- Indicate the percentage of voice/data costs to be charged to Title III, Part A, when applicable. Correlate any voice/data charges to the proportion of salary charged to Title III, Part A.

## Title IIIA Expenditures

### *Uniform Grant Guidance*

The LEA Title III, Part A Director is expected to manage Title III, Part A expenditures by adhering to the Uniform Grant Guidance in the most recent edition of the *Administrator's Handbook on EDGAR*. Relevant sections of the **EDGAR** Handbook are referenced, with selected citations in **Appendix F**.

### *Internal Controls*

The LEA ensures that it complies with the procedure for ensuring that federal funds are expended according to program requirements, evaluated and monitored for effectiveness and adhere to cost principles outlined in **2 CFR Part 200, Subpart E.** See also **EDGAR 2 CFR Part 200, §200.303 Internal controls** in Appendix F.

### *Supporting Documentation*

The LEA maintains accounting records that are sufficient to permit preparation of reports, tracing of funds to a level of expenditures, identification of the source and use of funds, and budgetary control. The LEA maintains accounting records that are supported by source documentation and costs are allowable under applicable laws and regulations. See **EDGAR, 2 CFR Part 200 §200.302 Financial Management** in Appendix F.

**Examples of Supporting Documentation:**

- Tutoring Documentation
    - List of Students tutored
    - Student Sign-In Sheets/Dated/Signed
    - Teacher Sign-In Sheets/Dated/Signed, Teacher Lesson Plans
- Record of Inventory

    - Include Fiscal Year's Federal Grant Award Identification Number (FAIN) on Inventory record
    - Written inventory procedures for all Federal Programs in LEA
- Professional Learning Activities
    - Agendas
    - Sign-in Sheets - Dated/Signed, indicating Role of participants
    - Handouts
- After-the-Fact Periodic Certifications
    - Written plan detailing when after-the-fact periodic certifications will be conducted (Federal Programs)
- Detailed Time Logs
- Written procedures & written or digital evidence of LEA verification for suspension and debarment.
- *Strong, Moderate, Promising or* Logic Model Evidence for expenditures charged to function codes 1000, 2100, 2210 & 2213 that student interventions improve English proficiency and academic achievement, that teacher and administrator PD is of a high-quality, personalized, and increases their capacity to teach ELs, and that parent, family, & community engagement strategies are effective
    - "Demonstrates a rationale based on high-quality research findings or positive evaluation that such activity, strategy, or intervention is likely to improve student outcomes, and includes ongoing efforts to examine the effects of such activity, strategy, or intervention."
    - GaDOE Federal Program staff will guide LEAs to consider the levels of evidence when budget planning/review, monitoring activities, and support the use of available websites/resources. Please refer to the "Is this an Evidence-Based Strategy or Intervention?"

### *Compensation*

- All Title III, Part A-funded positions or proportionate positions, additional compensation, stipends, etc. should be supported by narrative in the LEA's CLIP, Program Information Tab, and budget description. Uploading a Logic Model will not suffice for a description of an EL Program Plan with funded positions.
- All salaried positions must be accompanied with a formal Job Description. If the salary is funded from two fund sources, the job description must indicate the tasks performed for each funding sources, by percentage. If the LEA cannot revise an existing Job Description due to Board rules, the LEA must submit a Job Description amendment specifying which activities/tasks are funded with Title IIIA and which are not.
- If the LEA budgets additional compensation to employees working off-contractual hours, then an informal job description of the Title III-compensated additional

work to be performed and expected deliverables must be uploaded in the Attachments section and submitted along with the budget.

### *Contracted Services*

- Indicate whether the contracted services are provided by internal staff or outside consultants
- Identify who the District will contract with for these services; how the District complies with Federal requirements for contracted services (suspension/debarment requirements) and whether the District will enter into a written contractual agreement.

### *Travel Expenses*

- Travel costs must adhere to the LEA's Federal Programs policies, procedures, and processes
- Meals and mileage are reimbursed according to state travel guidelines
- USDE is not allowing out-of-country travel with Title III, Part A funds

## Carry-Over Amounts

- Districts are strongly encouraged to spend 100% of their Title III, Part A subgrant during the 15-month period of performance. However, if necessary, any unexpended funds will be carried over to the next fiscal year. These carried-over funds must be completely spent in that fiscal year, no exceptions. Any unexpended grant funds at the end of 27 months for that grant are returned to the GaDOE.
- Any unexpended administrative funds may be used for administration in the carryover-amended budget as well. The LEA should calculate the portion of unexpended administrative funds to re-budget in the carryover amendment and ensure the district is not budgeting more than 2% of the **original** (previous year's) allocation on administration. In this way, any unexpended administrative set-aside funds from the previous year can be added to the current year's 2% administrative funds.
- LEAs typically receive official letter from the GADOE Grants Accounting Office announcing the carry-over amount.

## Amendment Processes

Per **EDGAR 2 CFR Part 200, §200.308 (b)** *Recipients are required to report deviations from budget or project scope or objective and request prior approvals from Federal awarding agencies for budget and program plan revisions, in accordance with this section.*

- After the LEA's budget is approved by the GaDOE, any transfer of funds from one function or object code to another requires a budget amendment to be submitted. There is no 25% leeway as in Title I, Part A.
- Any budget amendment must be supported by EL-related elements in the LEA's CLIP to show alignment with LEA initiatives.
- Any budget amendment must include changes to the EL Program Plan to ensure both the Plan and the Budget align.
- LEAs may submit a budget amendment in the Consolidated Application Portal as long as the fiscal year has not been closed (Completion Report Submitted).
- Budget amendments are subject to a comprehensive review process, which includes a review of the original budget.
- Please Note:
  Budget amendments should clearly indicate where and why INCREASES were made and/or DECREASES were made to the originally approved budget. In addition, if any new activity, strategy, intervention is in the amendment, the LEA must amend the EL Program Plan to align with the Amended Budget as well.

## Required Attachments

### *Job Descriptions*

All fully or proportionally funded positions included in the Title III, Part A Budget (including positions coded to Object Code 199) must be accompanied with a **Job Description** uploaded in the Title III, Part A Attachments Tab in the ConApp for review along with the budget. The document naming conventions for Job Descriptions include the Fiscal Year, District Name, Specific Grant Name and Job Title *that matches the Job Title in the Grant from which the full or proportional salary is being funded.* **Example:** FY20ApplingTitleIII-A_SIOPInstructionalCoachJobDescription.

- The Job Descriptions must specify which tasks are funded with state/local funds and which tasks are funded with federal funds.
- Any administrative duties should be reflected in the job description.
- The phrase "and any other tasks as assigned" is not acceptable in a federally funded Job Description. This type of "duty" must be funded with state/local funds.
- Federally funded positions cannot manage/oversee non-federally funded positions.
- The Job Description Title **must** match the Job Title in the Budget

### *Title III Educational Field Trip Approval Form*

All requests for student field trips in either the Title III, Part A English Learner or Title III, Part A Immigrant Budgets **must** be accompanied by a completed *Field Trip Approval Form* uploaded in the Title III Attachments section of the ConAPP. This form will be

reviewed by GaDOE federal programs staff along with the Title III, Part A budget. The Field Trip Form should follow these naming conventions: Fiscal Year, District Name, Specific Grant Name, and Document Title. **Example:** FY20ApplingTitleIII-A ELFieldTripForm

The *Field Trip Approval* forms (one for English Learner Field Trips and one for Immigrant Field Trips) template can be found in the Budget Development tools section of the Title IIIA Program Management Guidance website.

## Immigrant Program Information & Budget

For LEAs that receive an Immigrant subgrant, the Immigrant Program Information tab must be completed and submitted with the Immigrant budget. Activities led by the LEA using Immigrant funds must be described in a detailed narrative in the Immigrant Program Information Tab. Each expenditure noted in the IMM budget must be linked to the activities specified in the Immigrant Program and may only be made in support of allowable activities under the grant. [See Section 3115(e)]

Districts must be careful to ensure that Immigrant supports are not language-focused but rather are focused on cultural and social-adjustment to U.S. schools. In fact, Districts must identify who the Immigrant students are, what their needs are, and what their families' needs are as well. Many immigrant students are already fluent in English are not English Learners and do not need EL services.

**Note:** If IMM and EL funds are co-mingled to fund the same type of activities, LEAs must clarify the percentage of funds used from each Title IIIA program in relation to the percentage of EL and/or IMM students benefiting from those activities.

## Title III, Part A Monitoring

Under Sec. 3113(b)(8), states awarding Title III, Part A subgrants to LEAs must monitor the progress of each eligible entity receiving the subgrant to ensure English Learners achieve English proficiency and further assist the LEAs if the strategies funded under this subgrant are not effective. Federal Programs Cross-functional Monitoring of LEAs takes place on a four-year rotational cycle; however, LEAs may be embedded out-of-cycle into a monitoring year based on a Federal Programs risk assessment or a GaDOE audit risk assessment.

The Cross-Functional Monitoring process (CFM) includes staff from Federal Programs, IDEA, and other agency departments. Monitoring visits typically last one to two days

and the visit dates are agreed upon by GaDOE federal programs staff and central office staff at the LEA. All information about CFM monitoring can be found on the Federal Programs Monitoring website including the posted monitoring cycle.

### Preparing for a Title III, Part A Monitoring Visit

Three types of Title III, Part A-funded LEAs are eligible for Title III, Part A monitoring, as part of Cross-Functional Monitoring (CFM) process:

1. Those receiving **Independent** Title III, Part A EL Allocations,
2. Those acting as **Lead LEA** in a Consortium, and
3. **Any LEA** in receipt of Immigrant funds.

After the Federal Programs statewide Cross-Functional Monitoring Webinar in August each year, the regional Title III, Part A Specialists will provide either virtual or face-to-face trainings to the LEAs on the current monitoring cycle. Thus, the LEAs preparing to be monitored will receive communication directly from their assigned Title III, Part A regional specialist, which will include the date, time and link for either a *GoToWebinar* training session or an onsite training visit to give LEAs an opportunity to learn details about the monitoring process and the required submissions as well as ask questions.

It is important to note that changes and improvements are made to the Cross-Functional Monitoring process each year. Therefore, a training webinar held in a prior year – though helpful – may not be comprehensive or fully aligned to the current year's monitoring process. For this reason, it is **highly encouraged** that LEAs preparing to be monitored attend the Federal Programs training webinar and the Title IIIA regional training. Questions related to these sessions should be directed to the LEA's assigned regional Title III, Part A Program Specialist.

### Which CFM Process - Desktop or Onsite?

To start the process of scheduling the onsite CFM date, the Federal Programs Director communicates with Superintendents of LEAs identified for monitoring. Since it is possible for the CFM Onsite visits to be scheduled on the same date creating an overlap for the Title III, Part A Specialist assigned to those LEAs, some LEAs will be designated as a Desktop review (monitoring documentation submitted electronically), instead of Onsite. In FY20, LEAs were also given the flexibility to choose whether they wanted a Desktop or Onsite review.

The Desktop monitoring process typically does not include the onsite group interviews nor EL parent telephone interview components; however, if necessary, if will include some virtual group interviews. It always includes an interview with the Title IIIA Director.

## Supporting Documentation

LEAs must review the most current Cross-Functional Monitoring Indicators document on the Federal Programs Monitoring website

Title III will monitor **five Overarching Indicators (1, 2, 3, 4, and 5**) and five Title III, Part A-specific indicators (**Indicators 18.1, 18.2, 18.3, 18.4, & 18.5)** in the CFM Indicators document for a total of ten indicators.

Title III, Part A Language Program website, Title III, Part A Monitoring Documents, has all the documents LEAs need to prepare documentation for review.

1. Title IIIA Program Overview Form (similar to an Annual Report)
2. Title IIIA Monitoring Guide (provides guiding questions for the Indicators)
3. Title IIIA Monitoring Data Rosters (Excel spreadsheet to be populated by LEAs with EL and Immigrant student data)
4. Title IIIA Monitoring Training PPT
5. Staff Interview Sign-In Sheet
6. Letter to Parents regarding Telephone Interviews

All LEAs are encouraged to review these documents to become familiar with what is required and will be requested of them during Federal Programs CFM process. *Those previewing these documents outside of their assigned monitoring cycle, however, must recognize that monitoring processes may change slightly from one year to the next.* The CFM training webinars and Programs Specialists' individual training will provide specific guidance on how LEAs should use these documents as they prepare to be monitored.

The supporting documentation must be organized in files named after each *CFM Indicator/Element Number*. These files, along with the *LEA Monitoring Data Rosters* excel spreadsheet must be submitted to the GaDOE in the secure SLDS Monitoring Portal, on the following dates:

1. Desktop documentation is submitted to the GADOE via the secure ConAPP portal **on** the CFM scheduled date.
2. Onsite Title IIIA monitoring documentation will be submitted to the GaDOE **two weeks** prior to the scheduled CFM onsite visit.

Files may need to be zipped before submitting in the Monitoring Portal – the Title IIIA Specialist will explain more details.

In addition, after the Oct FTE reports are submitted to the state, the LEA will be provided, with an ***LEA Monitoring Data Roster*** excel spreadsheet**,** pre-populated from Data Collections, that should be reviewed and updated accordingly to ensure the data is

correct and **current**. For instance, all new EL students enrolled in Fall 2019 (Kinder and other) will need to be added to the roster. Withdrawn EL students should be deleted.

After the data cleaning process, this LEA Monitoring Data ROSTER will be included in the Title IIIA Monitoring Documentation submitted either **2 weeks before** the CFM onsite date or **on the CFM** Desktop date. This roster includes students' name, grade, school, GTID, EL status code, name of ELA & ESOL teacher, ESOL status, segments, model, course name, Screener date/score, and two years of ACCESS for ELLs scores (or other state's language assessment scores).

Note: Because it contains PII, it must be submitted through the secure ConAPP Email system to the regional Title IIIA Program Specialist assigned to monitor that LEA.

If the LEA receives funding from the Title III, Part A Immigrant subgrant, the supporting documentation will be submitted along with the supporting documentation for the EL subgrant, as indicated in the Monitoring Checklist. If only the Title III, Part A Immigrant Program is chosen for a monitoring review, this documentation will also be submitted per Federal Programs Indicators and submission process.

The LEA will submit, one week prior to the CFM onsite visit, the completed *Title IIIA Program Overview Form* which can be found on the Title III-A Monitoring website.

### Onsite Monitoring Visit Components

Onsite monitoring includes a telephone **EL Parent Interview** process which is implemented as follows:

1. Complete EL Parent information on the LEA Monitoring Data ROSTER, submitted via ConAPP portal **2 weeks prior to** onsite visit.
2. Download the English and translated invitation letter **templates** from the Title III-A Monitoring website. Complete the templates with District letterhead and appropriate dates.
3. Send (can be mailed) Invitation-to-Interview Letters to all parents of ELs in LEA **two weeks prior to the CFM onsite visit.**
4. The Title III, Part A bilingual Parent Liaison will use the information on this list to call parents and ask them interview questions in Spanish, or in other languages (using interpretation services).

Onsite monitoring includes a face-to-face group **Staff Interview** process, implemented as follows:

1. Complete staff information on the appropriate tab of the LEA Monitoring Data ROSTER.
2. The Title III, Part A Specialist will select Title III-funded personnel to interview and possibly administrators of high-density EL schools, regular education

teachers of ELs, ESOL teachers of ELs for group interviews. The Title IIIA Director will be interviewed as well. In LEAs with large EL populations and several Title III-funded personnel, the specialist will select a sample from all categories of funded staff.

3. The Title III, Part A Specialist will inform the LEA **one week prior to the onsite visit** of the names of the selected personnel for the group interviews.
4. Prior to the visit, LEA will complete a Staff Interview Sign-In Sheet (downloaded from Title III-A Monitoring website), with the names of the personnel, their titles and roles.
5. During the visit, group interviews (lasting 45-50 min each) will be conducted per schedule sent **one week in advance** by Title III, Part A Specialist. All interviewees will sign this document as evidence of the interview process. Participants will have the opportunity to describe the elements of the district's Title IIIA language programs. This information will be triangulated with submitted documentation.

Onsite monitoring includes an EL Record Review process, implemented as follows:

1. The LEA will review a pre-populated LEA Monitoring Data Roster (delivered via ConAPP from Data Collections) and updated/complete it (aka "clean it up") to submit back to the GaDOE **2 weeks prior to the onsite visit.**
2. The Title III, Part A Specialist will review the information submitted in the LEA Monitoring Data ROSTER.
3. The Specialist will notify the LEA **1 week prior to the onsite visit** which EL student records will be reviewed onsite.
4. The LEA will have the selected EL Student Records ready for review on the date of the CFM onsite visit. On page 25 of the EL Language Programs – State Guidance, posted on the ESOL Language Program website LEAs will find a list of the core EL documents that will be reviewed onsite.

The Title III, Part A specialist will triangulate data from staff interviews, supporting documentation, and GaDOE documentation to inform the CFM Title III, Part A Report. Some financial documentation may also be reviewed onsite as necessary. If necessary, additional documentation may be requested to ensure accurate interpretation of LEA's processes.

### Post-Monitoring

Following the onsite visit/desktop review, the Title III, Part A Program Specialist will complete a CFM Report submitted electronically through the GaDOE Monitoring Portal. The Title III, Part A Program Manager reviews the Program Specialist's CFM Report before submitting it to the Federal Programs Director for final review and approval.

Once fully approved, it will be released to the LEA for review and corrective action response when applicable.

**Note**: Each LEA has self-selected the staff that are permitted access to the Monitoring Portal. If not provided with Monitoring Portal access, a Title III, Part A Director expecting a monitoring report should communicate with Portal-approved colleagues to ensure that he/she is advised when the LEA's Title III, Part A report is submitted to the LEA from the GaDOE.

If Title III, Part A findings were assigned to the LEA, a "Corrective Action Plan" (CAP) must be developed to address and correct the findings. A Title III-A CAP template is attached to the Indicators in the Title III, Part A monitoring reports that have findings and a separate template must be submitted to describe the plan for resolving each finding. LEAs submit their CAP(s) as attachments in the GaDOE Monitoring Portal using a Title IIIA CAP Template. The LEA's CAP must fully correct the findings in written processes which the LEA is expected to fully implement. Subsequent monitoring of the LEA will include a review of any previous CAP processes and implementation.

Corrective Action Plans are due **on the date designated** in the CFM Portal by the Federal Programs Director. The Regional Title III, Part A Specialist reviews the CAP(s) and either approves the plans or suggests changes. The CAP is approved in the Monitoring Portal process by the Program Specialist, Program Manager, and Federal Programs Director. After that, the LEA may implement the CAP. Once the LEA has completed its year-long corrective action process, the Title III, Part A Program Specialist will conduct a follow-up interview with the LEA to discuss progress to ensure the CAP has been fully implemented as planned.

Questions about this post-monitoring process should be directed to the LEA's regional Title III, Part A Program Specialist.

## Monitoring LEA's English Language Proficiency (ELP) Assessment Participation Rate

According to Title I, Part A statute in ESEA/ESSA §1111(b)(2)(G), "local educational agencies (LEAs) in the State will provide for an annual assessment of English proficiency of all English learners in the schools served by the State educational agency (SEA)". Furthermore, 34 CFR § 200.6(h)(1)(ii) requires "each LEA to use such assessment to assess annually the English language proficiency, including reading, writing, speaking, and listening skills, of all English learners in kindergarten through grade 12 in schools served by the LEA." Additionally, 34 CFR §200.6(5) states, "A State

must provide for an alternate English language proficiency assessment for each English learner covered under paragraph (a)(1)(ii) of this section who cannot participate in the assessment under paragraph (h)(1) of this section even with appropriate accommodations."

And finally, Title III, Part A statute in ESEA/ESSA § 3113(b)(3)(B), requires the SEA to ensure that eligible LEAs receiving Title III funds annually assess the English proficiency of all English learners, consistent with the Title I, Part A statute.

The annual English language proficiency (ELP) assessment in Georgia is the WIDA ACCESS for ELLs® 2.0 and the Alternate ACCESS. The ELP assessment participation requirement includes EL students whose parents have waived ESOL language program services or who may not be receiving ESOL services for other reasons. Please review state guidance on this requirement in EL Language Programs – State Guidance, posted on the ESOL Language Program website.

Therefore, each year, the Division of Federal Programs Title I, Part A and Title III, Part A review LEAs' annual ELP Assessment Participation Rates based on the previous school year's test administrations of the Alternate ACCESS and ACCESS for ELLs 2.0.

**If an LEA's ELP Assessment Participation Rate is less than 100%,** then the LEA will determine the reasons or categories of reasons that led to this rate. A best practice would be to establish and implement procedures that ensure the ELP assessments are administered to all EL students annually.

**If the LEA's ELP Assessment Participation Rate is less than 95%,** then the LEA will determine the reasons that led to this rate. The LEA will download and complete the Excel Spreadsheet called *Access Non-participation Reasons* on the Title I, Part A Other Resources webpage. When completed, this file will contain Personally Identifiable Information (PII) and may not be submitted via regular email. Therefore, the LEA will submit the completed file (Access Non-participation Reasons) to the Title I, Part A (& Title III, Part A when applicable) Program Specialist using the ConAPP Secure Portal. The Secure Email message system is found on the blue bar across the top of the main Portal page.

District leaders will want to contact their Title IIIA Specialist or ESOL Language Program Manager for some ideas on best practices regarding identification of English learners during the testing window. Another contact resource is the GaDOE Assessment Specialist or System Testing Coordinator (STC) for ideas on best practices regarding testing ELs and coding reasons for missing language subtests.

### Additional Information:

As the LEA reviews the non-participation reasons for missing language subtests, district leaders (Title I, Title III, and Assessment) may want to consider the following questions:

- Were some language subtests not administered? Why not? Were they administered, but not scored? Why not?
- Was the reason incorrectly reported for not scoring or not administering a language subtest?
- Were there any technical glitches that prohibited online testing and we didn't request paper testing instead?
- Did we not know these students were coded as English learners?
- Did these students transfer to our district from another school district and our registration process didn't identify student status fast enough during the testing window?
- Did we fail to ensure transfer EL students were tested?
- Did we incorrectly think EL/SWD students didn't need to be tested?
- Did we incorrectly think we didn't have to administer the tests to students whose parents waived ESOL language instruction services, or students not in ESOL?

Please visit the Title III, Part A Language Program website to view a technical assistance recording on the 2019 ELP Assessment Participation Rate monitoring process in FY20.

## Title III, Part A Equitable Services for Participating Private/Non-Profit Schools

Students identified as English learners as well as teachers, principals and other school leaders in private, non-profit schools are eligible to participate in Title III, Part A equitable services. The use of funds must be to improve the English language proficiency of identified English learners, educators' professional knowledge related to working with English learners in their classroom and/or engagement with parents and families of English learners in the private school. Funds may also be directed toward costs related to the assessment of the quality of Title III services rendered to the private school(s).

All information regarding equitable services in private schools participating in Federal Programs may be found on the Federal Programs' Ombudsman website. This website includes templates, a handbook, and the districts' current Equitable Services Allocations (Proportionate Share) per Federal Program.

### Private School Participation

LEA subgrantees are required to consult with all private schools within the geographic boundaries of the district, after which these schools have the option to participate in

Title III, Part A equitable services. The private school's share of the Title III, Part allocation would be calculated as the LEA subgrant, minus 2% administration costs, divided by the total number of both LEA and private school English Leaners. This results in a smaller per pupil allocation (PPA) than the original LEA received. Private schools must participate in meaningful consultation with the LEA per Federal Programs Requirements as described in the Federal Programs Handbook and the State Ombudsman website. See also the nonregulatory Guidance for Title IIIA Equitable Services found on the Title IIIA Program Management Guidance website.

### Notifications

Title III, Part A and Title VIII of ESSA require that public LEAs annually contact appropriate officials of all private schools within the geographic boundaries of the LEA to determine if they want to participate in the Language Instruction for English Learners and Immigrant Students' program, regardless of previous participation decisions made by those private school officials.

(See Federal Programs Handbook, pg. 71 for Notification Requirements; p. 74 for Consultation & Planning Requirements; and p. 80 for Private School Carryover)

### Allocations

LEAs with private schools participating in Title III, must collaborate with the private non-profit schools to identify the English Learners at each private school. The LEA will submit this private school EL count to the GaDOE in the spring of every year.

Allocations and the methodology used to determine the allocations are posted to the State Ombudsman's website. Title III, Part A allocations are determined based on the prior year's reported number of identified English learners in each private school in an LEA. The private school per pupil English learner allotment is equal to the LEA's per pupil English learner allotment without the 2% administrative set-aside.

## Proportionate Share

Section 8501(a)(4) of the ESEA, as amended by the ESSA, requires that expenditures for educational services and other benefits for eligible private school children, their teachers, and other educational personnel serving those children, under Title III, Part A, be equal to expenditures for the public-school program, considering the number and educational needs of the children to be served.

The State Educational Agency (SEA) receives the federal funding and disperses it to the LEAs and informs the private school officials of the amount of funding available to serve their students, their parents and their teachers in each of the programs. GADOE will also inform private school officials about how their proportionate share of funding was calculated. This information is posted on the Ombudsman's website. In addition, the Title III-A Method for Calculating Proportionate Share is on this webpage. (See

Federal Programs Handbook) An LEA may not expend more Title IIIA funds on private schools' equitable services than what has been allocated.

### Calculating Proportionate Share for Equitable Services under Title III, Part A

Georgia determines the amount required for Title III, Part A equitable services to participating private schools based on the total enrollment of private and public-school English learner (EL) students in a school district, assuming these numbers also accurately reflect the relative needs of EL students and their teachers in the public and private schools.

**Chart 7:** *Example of formula to determine amount for Title III, Part A equitable expenditures*

| **A. Number of English Learner (EL) Students** | |
|---|---|
| A1: LEA EL Enrollment | 100 |
| A2: Participating Private School EL Enrollment | 10 |
| A3: Total EL Enrollment = A1 + A2 | 110 |
| **B. Title III, Part A Allocation** | |
| B1: Total LEA Allocation | $15,000 |
| B2: 2% Administrative Costs (for public and private school programs) | $300 |
| B3: LEA Allocation minus Admin Costs = B1 – B2 | $14,700 |
| **C. Per Pupil Rate** | |
| C1: B3 divided by A3 | $133.64 |
| **D. Equitable Services** | |
| Amount LEA must reserve for equitable services for private school children, their teachers, and other educational personnel = A2 x C1 | $1336.36 |

## Eligible Activities

LEAs providing private school equitable services to English learners and/or their educators may do so in accordance with all allowable use of funds. Title III, Part A requires services to be in support of English learners' development of English proficiency, EL-related professional learning opportunities and/or school engagement with parents of English learners.

(See Federal Programs Handbook for Program Implementation & Record Keeping; for Complaints; and for the Role of the state Ombudsman)

Please visit the Ombudsman website for a wide variety of forms, resources, and training PPTs. In addition, it is important to become familiar with the new Private School Platform in SLDS – ES4PS.

In addition, LEAs may choose any valid/reliable ELP assessment to identify and assess English learners in private schools participating in equitable services. See options in Chart #8 below.

***Chart 8:*** *English Language Proficiency Assessment Options Available for Private Nonprofit Schools in GA Participating in Equitable Services in FY19*

| | Name of Assessment | Test Developer | Web Address |
|---|---|---|---|
| 1 | English Language Proficiency Assessment for the 21st Century (**ELPA21**) | UCLA – CRESST (possibly open source now?) | http://www.elpa21.org/ |
| 2 | **IDEA** Proficiency Test (IPT) | Ballard & Tighe Publishers | www.ballard-tighe.com |
| 3 | **LAS-LINKS** English Language Proficiency Test | Data Recognition Corporation (DRC) | http://laslinks.com/ |
| 4 | Language Proficiency Test Series (**LPTS & ELPTS**) | MetriTech, Inc. | www.metritech.com |
| 5 | **Questar** | Educational Testing Services (ETS) | http://www.questarai.com/assessments/english-language-proficiency-assessments/ |
| 6 | Stanford English Language Proficiency Test 2 (**SELP2**) | Pearson English Learning System | http://www.pearsonenglishlearningsystem.com/assessment |
| 7 | Test of English Language Learning (**TELL)** | Pearson – Learning Assessments | https://www.pearsonassessments.com/feature/tell/index.html |
| 8 | **WIDA MODEL** Assessment | Univ. of Wisconsin-Madison for WIDA Consortium | https://wida.wisc.edu/assess/model |
| 9 | Woodcock-Muñoz Language Survey III | Available @ Nelson & Houghton Mifflin Harcourt | http://www.nelson.com/assessment/clinical-wmls.html https://www.hmhco.com/shop/k12/WoodcockMunoz-Language-Survey-III/id/1683301 |

# Appendix A – Regional LEA Consortium Development Guidelines

**Guidelines for Title III, Part A Consortium Memorandum of Understanding or Agreement between Lead Applicant LEA and Member LEAs**

1. On the MOU/Agreement, list the acting fiscal agent for the consortium, as well as each LEA that will be participating in the consortium. Include the signatures of the superintendents/designees of the LEAs participating in the Title III, Part A Consortium.

2. Develop a common plan to use the Title III, Part A funds efficiently to meet the identified needs of the consortium members. The plan must detail the activities that each member of the group will perform to carry out the purpose of ensuring that ELs develop English proficiency and meet the same academic content and achievement standards that all students are expected to meet. The plan must include the following three elements:
    a. How the participating LEAs will supplement services for ELs;
    b. How professional development will be provided to improve instruction for ELs; and
    c. What outreach services and/or activities will be provided to EL parents, families or communities.

3. State the responsibilities of the fiscal agent which must include:
    a. Maintenance of the written MOU/agreement regarding consortium members' participation;
    b. Submission of the Consortium's collaboratively developed Title III, Part A Program Plan, Assurances and Budget (including Amendments) in the Consolidated Application;
    c. Ensuring that Title III, Part A funds are shared and spent to fully carry out the Program Plan, benefit all consortium members equally, and ensure fulfillment of Title III, Part A-required activities;
    d. Control of all fiscal transactions of the consortium (requisitions, purchases, payments, etc.);
    e. Maintenance of records of all inventory lists and financial transactions carried out on behalf of the consortium;
    f. Expenditure monitoring of all participating LEAs to ensure compliance with Title III, Part A supplement, not supplant requirements; and

g. Fulfillment of data gathering, reporting and documentation submission requirements, on behalf of the Consortium, for Title III, Part A monitoring purposes.

4. Specify how the consortium will meet the reporting provisions of Title III, Part A, which annually requires
    a. A description of the programs and activities conducted by the consortium LEAs with Title III, Part A funds, which shall include a description of how such programs and activities supplemented programs funded primarily with State or local funds;
    b. A description of the number and percentage of English learners in the programs and activities who are making progress toward achieving English language proficiency, as described in section 1111(c)(4)(A)(ii), in the aggregate and disaggregated, at a minimum, by English learners with a disability;
    c. The number and percentage of English learners in the programs and activities attaining English language proficiency based on State English language proficiency standards established under section 1111(b)(1)(F) by the end of each school year, as determined by the State's English proficiency assessment under section 1111(b)(2)(G);
    d. The number and percentage of English learners who exit the language instruction educational programs based on their attainment of English language proficiency;
    e. The number and percentage of English learners meeting challenging State academic content and student academic achievement standards for each of the 4 years after such children are no longer receiving services under this part, in the aggregate and disaggregated, at a minimum, by English learners with a disability;
    f. The number and percentage of English learners who have not attained English language proficiency within 5 years of initial classification as an English learner and first enrollment in the member LEAs; and
    g. Any other information that the GaDOE may require.

5. A Consortium receiving Title III, Part A funds must use those funds:

    ‘‘(1) to increase the English proficiency of English learners by providing effective language instruction educational programs that meet the needs of English learners and demonstrate the effectiveness successes in increasing—

‘‘(A) English language proficiency; and

‘‘(B) student academic achievement in the core academic subjects; and

‘‘(2) to provide effective professional development to classroom teachers (including teachers in classroom settings that are not the settings of language instruction educational 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 English learners;

‘‘(B) designed to enhance the ability of such teachers, principals, and other school leaders to understand and use implement curricula, assessment practices and measures, and instructional strategies for English learners;

‘‘(C) based on scientifically based research demonstrating the effectiveness of the professional development in 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 and duration (which shall not include activities such as one-day or short-term workshops and conferences) to have a positive and lasting impact on the teachers’ performance in the classroom, except that this subparagraph shall not apply to an activity that is one component of a long-term, comprehensive professional development plan established by a teacher and the teacher’s supervisor based on an assessment of the needs of the teacher, the supervisor, the students of the teacher, and any local educational agency employing the teacher, as appropriate; and

(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.”

*ESEA, as amended by the ESSA,* Title III, Part A Section 3115(c)

# Appendix B –LEA Consortium Sample MOU or Agreement

Elementary and Secondary Education Act, Title III, Part A, Part A,
Language Instruction for ELs LEA Consortium
Memorandum of Understanding/Agreement, (Insert) School Year

This Memorandum of Understanding/Agreement represents the agreed-upon Title III, Part A program, services and products to be provided to English learner (EL) students in the W County School District, the X County School District, Y City Schools and the Z Charter School, (Members), during the [insert] school year. The W County School District (WCSD) will act as lead local educational agency (LEA) and member. The consortium shall be named the W County Title III, Part A Consortium (the Consortium).

The WCSD will be responsible for acting as the fiscal agent for the Consortium and will submit the W County Title III, Part A Consortium Program Plan, Budget and any subsequent Amendments, file the required expenditure reports and maintain fiscal records for the Consortium. The Consortium will plan to expend all Title III, Part A funds during the [insert year] grant year. WCSD must continue to serve as the fiscal agent for the Consortium until all funds are expended or, at maximum, for the duration of the 27 months grant period.

SAMPLE

According to the [insert year] Georgia Department of Education Title III, Part A calculations, based on [previous year] Student Record data submitted by the Members to the GaDOE, the Consortium enrolled [insert EL Counts] EL students, which results in a subgrant amount of approximately [insert grant amount]. In its role as the lead LEA, the Consortium will support a total amount of programs, services, and products as indicated below:

| Program/Service/Product | Approximate Cost |
|---|---|
| Lead LEA may claim up to 2% Direct Administrative Costs (Consortium grant amount allocation X 2%) | $_____ |
| Lead LEA may claim program related indirect expenses | |
| (Expenses cannot exceed Lead LEA's approved indirect cost) | $_____ |
| Reimburse purchase of ___ as supplemental instructional resources | $_____ |
| Reimburse costs of after-school programs for materials/staff hours | $_____ |
| Provide professional development series regarding effective EL student | $_____ |
| instructional practices to # consortium teachers, staff and administrators @ $____ each. | |

| | |
|---|---|
| Reimburse costs of EL parent/family engagement materials/activities | $_____ |
| **Anticipated Total Title III, Part A Consortium Grant allocation** | **$_____** |

[1] *Source: CADOE, March 2017, Adapted for use in Georgia.*

In addition to the above services and products, the WCSD will coordinate regular meetings for the purpose of assessing the needs of the Consortium.

Changes regarding the provision, the scope and/or nature of the planned services must be made by agreement of the Members and submitted in accordance with the GaDOE budget amendment procedures. Funds must be USDE before the end of the 27 months grant period.

As lead LEA, the WCSD is responsible for gathering Consortium data, compiling, completing and submitting the Annual Title III, Part A Report to the GaDOE and, as a Title III, Part A subgrantee, engaging in Title III, Part A monitoring on behalf of the Consortium.

Signature of the LEA representative represents the indication that the Consortium has met and conferred, and the member LEAs are in agreement to all stated requirements and responsibilities.

SAMPLE

**Signatures of Authorized Representatives:**

| | |
|---|---|
| Print Name<br>Consortium Lead LEA (Fiscal Agent) Representative<br>(Superintendent or Designee) | Print Name<br>Consortium Member LEA Representative<br>(Superintendent or Designee) |
| Signature of Consortium Lead LEA (Fiscal Agent) Representative (WCSD) | Signature of Member LEA Representative |
| Date | Date |
| Print Name<br>Consortium Member LEA Representative<br>(Superintendent or Designee) | Print Name<br>Consortium Member LEA Representative<br>(Superintendent or Designee) |
| Signature of Consortium Member LEA Representative | Signature of Member LEA Representative |
| Date | Date |

| | |
|---|---|
| Print Name<br>Consortium Member LEA Representative<br>(Superintendent or Designee) | Print Name<br>Consortium Member LEA Representative<br>(Superintendent or Designee) |
| Signature of Consortium Member LEA Representative | Signature of Member LEA Representative |
| Date | Date |

# Appendix C –2018-2019 Immigrant Definition and Funding Matrix

## 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.

| District | # Immigrant Students Reported in Current Year | LEA meets minimum number for Immigrant grant? | # Immigrant Students Reported Year One (2015- | # Immigrant Students Reported Year Two (2016-2017) | Minimum Number Current-Year Immigrant Students Needed to Qualify | Is Current-Year Number ≥ 10% the Average of the Previous 2 |
|---|---|---|---|---|---|---|
| **SAMPLE 1** A County Schools | **600** | Yes | 570 | 585 | **636** (10%-increase over average of Year 1 and Year 2) | NO |
| **SAMPLE 2** B County Schools | **274** | Yes | 250 | 233 | **267** (10%-increase over average of Year 1 and Year 2) | YES |
| **SAMPLE 3** C County Schools | **75** | Yes | 115 | 90 | **114** (10%-increase over average of Year 1 and Year 2) | NO |
| **SAMPLE 4** D County Schools | **35** | No | N/A | N/A | Does not meet initial minimum (50) for subgrant consideration. | NO |

**Immigrant Children and Youth:**

The term immigrant means individuals who:

(A) are aged 3 through 21;

(B) were born outside of the U.S. and Puerto Rico

(C) have been attending one or more schools in any one or more States for less than 3 full academic years.

**U.S.:** This includes each of the 50 States, the District of Columbia, and Puerto Rico. This definition is for Title III, Part A purposes only and is unlike the definition of "State" in Section 9101 of the Elementary and Secondary Education Act (ESEA), which applies generally to ESEA programs. Section 9101 does include the outlying areas.

# Appendix D – FY20 Title III, Part A Chart of Accounts

| Object Codes | 1000 Instruction | 2100 Pupil Services & Family Engagement | 2210 Improvement of Instructional Services. | 2213 Instructional Staff Training | 2230 General Administration | 2300 Audit Cost and Indirect Cost | 2700 Student Transportation Services |
|---|---|---|---|---|---|---|---|
| 110 - Instructional Staff/Coach | | | | X | | | |
| 113 - Substitute | | | X | X | | | |
| 114 - Substitute | | | X | X | | | |
| 116 - Professional Dev.Stipends | | | | X | | | |
| 140 - Aides, Paraprofessionals | X | | | | | | |
| 142 - Clerical | | X - For Title III Program only | | | X | | |
| 172 - Elementary Counselor | | X - Supplemental | | | | | |
| 173 - Secondary Counselor | | X - Supplemental | | | | | |
| 176 - School Social Worker | | X - Supplemental | | | | | |
| 177 - Family Services, Parent Coordinator | | X - Supplemental; for Title III Program only | | | | | |
| 180 - Bus Drivers | | | | | | | X - **Approved** activities only (field trips, after-school tutoring, summer school) |
| 190 - Other Management Personnel | | | X | | X - Title III Director | | |
| 191 - Other Administrative Personnel | | | X | | X | | |

| Object Codes | 1000 Instruction | 2100 Pupil Services & Family Engagement | 2210 Improvement of Instructional Services. | 2213 Instructional Staff Training | 2230 General Administration | 2300 Audit Cost and Indirect Cost | 2700 Student Transportation Services |
|---|---|---|---|---|---|---|---|
| 199 - Other Salaries and Compensation | X - Tutoring after school or in the summer by Employee; | Supplemental compensation for employees who: teach English and/or literacy classes for EL or Immigrant parents; offer services in the parent outreach program | | | | | |
| 210 - State Health Insurance | X | X | X | X | X | | X - **Approved** activities only |
| 220 - FICA | X | X | X | X | X | | X - **Approved** activities only |
| 230 - TRS | X | X | X | X | X | | X - **Approved** activities only |
| 250 - Unemployment Compensation | X | X | X | X | X | | X - **Approved** activities only |
| 260 - Workers' Compensation | X | X | X | X | X | | X - **Approved** activities only |
| 280 - Benefit in Lieu of Soc.Security | X | X | X | X | X | | X - **Approved** activities only |
| 290 - Other Employee Benefits | X | X | X | X | X | | X - **Approved** activities only |
| 291 - Dental Insurance | X | X | X | X | X | | X - **Approved** activities only |
| 292 - Life Insurance | X | X | X | X | X | | X - **Approved** activities only |
| 300 - Purchased Professional/Tech Svcs. | X - Contracted Tutoring non-employee | X | X | X | | X - Audit Cost | |

| Object Codes | 1000 Instruction | 2100 Pupil Services & Family Engagement | 2210 Improvement of Instructional Services. | 2213 Instructional Staff Training | 2230 General Administration | 2300 Audit Cost and Indirect Cost | 2700 Student Transportation Services |
|---|---|---|---|---|---|---|---|
| 430 - Repair, Maint. Services | | | | | X | | |
| 432 - Repair and Maint-Tech Related | X | X | X | X | X | | |
| 441 - Rental of Land, Buildings | | | X - PD Venues | X - PD Venues | | | |
| 519 - Student Transportation Purchased From Other Sources | | | | | | | X - **Approved** activities only (field trips, after-school tutoring, summer school) |
| 530 - Communications, telecommunications | | | X | | X | | |
| 532 - Web-based Subscriptions & Licenses | X | X | X | X | | | |
| 580 - District Staff Travel | | X | X | X | | | |
| 595 - Other Purchased Svcs. | X | X | X | X | | | X |
| 610 - Supplies | X | X | X | X | X | | |
| 611 - Supplies: Technology Related | X | X | X | X | X | | |
| 612 - Computer Sofware that is Actually Owned on Hard Disk | X | X | | | | | |
| 615 - Expendable Equipment - calculators, VCRs, DVD players | X - Supplemental | X - Supplemental | X - Supplemental | X - Supplemental | X | | |

| Object Codes | 1000 Instruction | 2100 Pupil Services & Family Engagement | 2210 Improvement of Instructional Services. | 2213 Instructional Staff Training | 2230 General Administration | 2300 Audit Cost and Indirect Cost | 2700 Student Transportation Services |
|---|---|---|---|---|---|---|---|
| 616 - Expendable Computer Equip. <$5,000 - computers, printers, disk drives, smartboards | X - Supplemental | X - Supplemental | X - Supplemental | X - Supplemental | X | | |
| 620 - Energy | | | | | | | X - **Approved** activities only (field trips, after-school tutoring, summer school) |
| 641 - Textbooks | X - Supplemental | | | | | | |
| 642 - Books (Non-Textbooks) & Periodicals | X | X | X | X | | | |
| 810 - Registration Fees | X | X | X | X | X | | |
| 880 - Fed. Indirect Cost Charges | | | | | | X - Indirect Cost | |
| 881- Schoolwide Allocations | X | X | X | X | | | |

Appendix E – Budget Guiding Questions Chart

# Guiding Questions & Documentation
# For Title III-A English Learner & Immigrant Budgets

## FY20 Title III-A EL & Immigrant Grant FAIN: S365A190010

**Note:** *By answering these questions for each budget item, you ensure that the item is allowable, allocable, reasonable, & necessary – before submission!*

OVERARCHING Question to guide Budget Development: **IS IT IN THE EL PROGRAM PLAN?**

| Function | Object | Description Questions Checklist | Title III Documentation |
|---|---|---|---|
| **1000 – Use for items directly related to the instruction of pupils** | **140** Aides and Paraprofessionals | ☐ Is the aide or paraprofessional working only with English Learners?<br>☐ Is the para pro working under the direction of an ESOL teacher (supplemental)?<br>☐ Is the aide fully or partially funded with this grant?<br>☐ What is the Title III portion and who is paying the other portion?<br>☐ Is the Job Description uploaded?<br>☐ Does it clearly separate the split-funding duties?<br>☐ **Did we include these additional details:** What are the employment terms? Full time? For how many days? Part time? If part time – provide details, rate of pay? Hourly, if so, amount? Salaried? With or without benefits?<br>☐ Did we label the level of effectiveness for this para-pro? | • Job Description<br>• PARs or Time Log<br>• Student Roster<br>• Work schedule<br>• Effectiveness data / evidence |
| | **199** Other Salaries and Compensation | ☐ Who will these teachers be teaching?<br>☐ Is this additional compensation for an employed teacher working off-contract hours or a non-employed teacher?<br>☐ What is the hourly pay rate?<br>☐ Is this rate the federally approved district rate per hour for this type of work? | • Dated/Timed/Signed Teacher Attendance Rosters<br>• Dated/Timed/Signed Student Attendance Rosters<br>• Lesson Plans and/or other instructional documentation |

| | | | |
|---|---|---|---|
| | | ☐ How many hours? Or how many days?<br>☐ How many teachers?<br>☐ Have you uploaded an informal job/work description?<br>☐ Did we specify the timeframe for the work? Before school, after school, summer, Saturday school, etc.?<br>☐ Did we label the level of effectiveness for this activity/strategy/program? | • Signed Periodic Certification<br>• Job/Work Description<br>• Effectiveness data on LIEP program (tutoring? Summer school? After school?)<br>• Other documentation as needed |
| | **200** | ☐ Are all types of benefits included in this Object Code?<br>☐ Who are all these benefits for?<br>☐ Do the benefits match the personnel in this section?<br>☐ Is this the way the Finance Department wants benefits coded? | |
| | **210**<br>State Health Insurance | ☐ State Health for whom? | |
| | **220**<br>FICA | ☐ FICA for whom? Medicare for whom? | |
| | **230**<br>TRS | ☐ TRS for whom? | |
| | **260**<br>Workmen's Compensation | ☐ Workers Comp for whom? | |
| | **290 – 292**<br>Other Benefits | ☐ Other benefits for whom? Which benefits? | |
| | **300**<br>Purchased Professional Services | ☐ Is this contracted tutoring?<br>☐ Which contracting company?<br>☐ How many hours of service?<br>☐ Have we described the credentials of tutors for working with ELs?<br>☐ For which students?<br>☐ If $\geq$ $25,000, has the district checked the suspension/debarment (SAM) list for federal programs for this company/individual? | • Dated/Timed/Signed Tutor Attendance Rosters<br>• Dated/Timed/Signed Student Attendance Rosters<br>• Lesson Plans and/or other instructional documentation<br>• Signed Periodic Certification<br>• Contract Description<br>• Federal Programs Handbook policies/procedures |

| | | | |
|---|---|---|---|
| | | ☐ Timeframe for the work? Before school, after school, summer, Saturday school, etc.?<br>☐ Is the level of effectiveness for this activity/strategy/program labeled in the descriptor? | • Effectiveness data / evidence<br>• Other documentation as needed |
| | **532**<br>Communications/Web-Based Subscriptions & Licenses | ☐ What is the name of the instructional software?<br>☐ How many licenses will be purchased?<br>☐ What's the per unit price (reasonable?)?<br>☐ Do regular education students use this same software? How is the software funded for them?<br>☐ Will only ELs use this software?<br>☐ Is it designed to increase the academic English language proficiency of English Learners?<br>☐ What is the subscription year for these licenses? (It must benefit the ELs in this grant period)<br>☐ Has the level of effectiveness for these interventions been labeled?<br>☐ Has it been effective with your EL students? | • P.O.s<br>• Date of subscription clearly marked<br>• Intended participants in the software program clearly marked (only for ELs. Not EL=1 or EL=2 nor ESOL=No students)<br>• Research on effectiveness with ELs and/or District data as evidence of effectiveness<br>• Effectiveness data / evidence |
| | **610**<br>Supplies | ☐ Have we specified the resources, and named them?<br>☐ Have we indicated that these are consumable instructional resources only for ELs' language instruction in the supplemental Title III program (LIEP)?<br>☐ Are these instructional resources that enhance/expand the existing language program (ESOL)?<br>☐ Have we explained how other federal funds and/or local funds provide these supplies for regular ed students?<br>☐ Do these resources benefit the ELs in this grant period? | • P.O.s<br>• Internal control processes<br>• Inventory processes (only for EL use in the Title III program) |
| | **611**<br>Supplies, Technology Related<br>(ex: flash drives, monitor stands, Kindles, iPads below capitalization threshold) | ☐ Do other federal funds and/or local funds provide these technology related supplies/resources for regular ed students?<br>☐ How many will be purchased?<br>☐ What is the "per-unit" cost?<br>☐ Who will use them?<br>☐ Have we mentioned that headsets will or will not be used for assessment? | • P.O.s<br>• Internal control processes<br>• Inventory processes (only for EL use in the Title III program)<br>• Signed/dated yearly inventory review<br>• Federal Programs Handbook policies/procedures |

| | | | |
|---|---|---|---|
| | | ☐ Does the LEA have inventory procedures to prevent fraud, waste & abuse of pilferable items? | |
| | **615** Expendable equipment | ☐ Do regular education students use this same resource? How is it purchased for them?<br>☐ What is the "per-unit" cost?<br>☐ Who will be using them? Will only ELs use these electronic devices?<br>☐ How is it reasonable & necessary?<br>☐ Does the LEA have inventory procedures to prevent fraud, waste & abuse of pilferable items? | • P.O.s<br>• Signed/dated yearly inventory review<br>• Internal control processes (only for EL use in the Title III program)<br>• Inventory processes<br>• Federal Programs Handbook policies/procedures |
| | **616** Expendable Computer Equipment (ex: Chromebooks) | ☐ How many computers? Printers?<br>☐ What is the per unit cost?<br>☐ How is it reasonable & necessary?<br>☐ Who will be using them?<br>▪ Will only ELs use this expendable equipment?<br>☐ Do regular education students receive these items through local or other federal funding sources?<br>☐ Does the LEA have inventory procedures to prevent fraud, waste & abuse of pilferable items? | • P.O.s<br>• Internal control processes (only for EL use in the Title III program – district designed)<br>• Signed/dated yearly inventory review<br>• Inventory processes<br>• Federal Programs Handbook policies/procedures |
| | **641** Textbooks (Printed) | ☐ Are these supplemental textbooks (i.e. the District has already purchased ESOL textbooks)?<br>☐ Are they designed to increase the academic English language proficiency of English Learners? Are they effective in doing so?<br>☐ What is the name of the books and/or the vendor?<br>☐ How many will be purchased?<br>☐ What is the per unit cost? (to demonstrate reasonableness) | • P.O.s<br>• Internal control processes (only for EL use in the Title III program – district designed)<br>• Federal Programs Handbook policies/procedures |
| | **642** Books (other than textbooks) and Periodicals | ☐ Are these print resources other than textbooks?<br>☐ Are these resources supplemental to the LEA's ESOL program?<br>☐ What are they? (Name them)<br>☐ How will they be used?<br>☐ How many will be purchased?<br>☐ What is the per unit price? | • P.O.s<br>• Documentation that supports the supplemental nature of the purchased resources<br>• Internal control processes (only for EL use in the Title III program – district designed)<br>• Federal Programs Handbook policies/procedures |

| | | | |
|---|---|---|---|
| | **810**<br>Dues and Fees | ☐ Is this a subscription fee or a license or registration?<br>☐ How much is each fee?<br>☐ How does the activity accomplish the intents and purposes of the grant?<br>☐ Has the level of effectiveness for this activity/strategy/program been labeled?<br>☐ If these fees are for summer school registration or credit recovery courses, how many EL students?<br>☐ Are these only for EL students? (not for EL=1 and EL=2 students nor for EL students who aren't receiving ESOL language instruction) | • Student registration documentation<br>• Student participation documentation<br>• Federal Programs Handbook policies/procedures<br>• Effectiveness data / evidence<br>• Other documentation as needed |

| Function | Object | Description Questions Checklist | Title III Documentation |
|---|---|---|---|
| **2100 – EL Parent & Pupil Services** | **142**<br>Clerical Staff | ☐ Does this clerical position solely support the Title III language programs?<br>☐ Is this position fully or partially funded?<br>☐ Is a job description attached that clearly shows only Title IIIA duties for the Title IIIA funded portion? | • Student Rosters<br>• Job Description<br>• Periodic Certification<br>• Time Logs, if split-funded<br>• Other documentation as needed |
| | **172 & 173**<br>Counselor | ☐ Does the District use local/other state (QBE/FTE) or federal funds to provide a student advisor or counselor specifically for English Learners?<br>☐ Will this position be above & beyond the EL counselors already provided?<br>☐ Will the person in this position only work with EL students participating in the EL language program?<br>☐ Is this position fully or partially funded?<br>☐ Is a job description attached that clearly shows only Title IIIA duties for Title IIIA funded portion? | • Student Rosters<br>• Job Description<br>• Periodic Certification<br>• Time Logs, if split-funded<br>• Social Worker Yearly Plan/Schedule, Agendas, Attendance Rosters, Surveys, Feedback, and related documentation<br>• Other documentation as needed |
| | **176**<br>School Social Worker | ☐ Does the District use local/other state (QBE/FTE) or federal funds to provide a school social worker specifically for English Learners? | • Student Rosters<br>• Job Description<br>• Periodic Certification<br>• Time Logs, if split-funded |

| | | | |
|---|---|---|---|
| | | ☐ How will this position be above & beyond the school social workers already provided?<br>☐ Will the person in this position only work with EL students participating in the Title III language programs?<br>☐ Is this position fully or partially funded?<br>☐ Is a job description attached that clearly shows only Title IIIA duties for Title IIIA funded portion? | • Social Worker Yearly Plan/Schedule, Agendas, Attendance Rosters, Surveys, Feedback, and related documentation<br>• Other documentation as needed |
| | **177**<br>Family Services/Parent Coordinator | ☐ Is this a Parent Involvement position supplemental to Title I? How?<br>☐ Is this position fully funded or split-funded?<br>☐ If so, what is the Title III portion and who is paying the other portion?<br>☐ Has the Job Description been uploaded?<br>☐ Are the Title IIIA duties clearly specified in the Title IIIA portion? | • Job Description<br>• Periodic Certification<br>• Time Logs, if split-funded<br>• Parent Event Yearly Plan/Schedule, Agendas, Attendance Rosters, Surveys, Feedback, and related documentation |
| | **199**<br>Other Salaries and Compensation | ☐ Is this additional compensation for someone working with parents or providing other services to students?<br>▪ Who are these teachers working with?<br>☐ Is this additional compensation for an employed teacher working off-contract hours or a non-employed teacher?<br>☐ What is the hourly pay rate?<br>▪ Is this rate the federally approved district rate per hour for this type of work?<br>☐ How many hours? Or how many days?<br>☐ How many teachers?<br>☐ Have we uploaded an informal job/work description?<br>☐ Did we specify the timeframe for the work? Before school, after school, summer, Saturday school, etc.?<br>☐ Did we label the level of effectiveness for this activity/strategy/program? | • Informal job description<br>• Student and or parent rosters<br>• Time logs<br>• Agendas, Notes, Other documentation<br>• Deliverables / Artifacts from the work accomplished<br>• Effectiveness data / evidence |
| | **200**<br>Benefits | ☐ Are all types of benefits included in this Object Code?<br>☐ Who are all these benefits for?<br>☐ Do the benefits match the personnel in this section? | |
| | **300** | ☐ Who is the contract with?<br>☐ Who is being served by the contract? | • Contractor's EL Parent Engagement Plan |

| | | | |
|---|---|---|---|
| | Contracted Professional Services | ☐ What are the deliverables – how many hours of service/training is in the contract?<br>☐ What is the rate of pay?<br>☐ Has SAM been checked if the cost is ≥ $25,000?<br>☐ Is the contracted vendor a system employee or not?<br>☐ Is the label the level of effectiveness for this activity/strategy/program in the descriptor? | • Parent Sign in sheets for contracted workshops/training<br>• Agendas<br>• Invitations/flyers<br>• Effectiveness data / evidence |
| | **580**<br>District Staff Travel | ☐ Who is traveling?<br>☐ Why are they traveling?<br>☐ Where are they traveling? (specify)<br>☐ How is it related to the EL Parent Engagement program?<br>☐ How does it enhance the Title IIIA LIEP?<br>☐ Is the label the level of effectiveness for this activity/strategy/program in the descriptor? | • Travel Documentation<br>• Federal Programs Handbook policies/procedures<br>• Effectiveness data / evidence |
| | **610**<br>Supplies | ☐ What supplies? Have we specified them?<br>☐ For which parent engagement program are these supplies?<br>☐ How are they necessary for the activity/strategy/program?<br>☐ How are they reasonable & necessary?<br>☐ If we have participating **private schools**, have we specified the ELP screening & assessment materials for these schools only?<br>☐ Did we stay within the equitable services allocation amount? | • P.O.s<br>• Internal control processes (only for use in Title IIIA programs)<br>• Federal Programs Handbook policies/procedures |
| | **611**<br>Supplies, Technology Related<br>(ex: flash drives, monitor stands, Kindles, iPads below capitalization threshold) | ☐ Do other federal funds and/or local funds provide these technology related supplies/resources for regular ed students?<br>☐ How many will be purchased?<br>☐ What is the "per-unit" cost? (reasonableness)<br>☐ Who will use them?<br>☐ Why are they necessary? | • P.O.s<br>• Internal control processes (only for use in Title IIIA programs)<br>• Signed/dated annual inventory review<br>• Inventory processes<br>• Federal Programs Handbook policies/procedures |
| | **615 & 616**<br>(expendable equipment / expendable computer equipment) | ☐ How many items?<br>☐ What is the per unit price?<br>☐ Is it reasonable & necessary?<br>☐ Who will be using them? | • P.O.s<br>• Internal control processes (only for use in Title IIIA programs)<br>• Inventory processes<br>• Signed/dated annual inventory review |

| | | | |
|---|---|---|---|
| | | ☐ Do regular education students receive these items through local or other federal funding sources?<br>☐ Will only ELs or their parents use these items | • Federal Programs Handbook policies/procedures |
| | **642**<br>Books (other than textbooks) and Periodicals | ☐ Are these supplemental to what the district already provides?<br>☐ What are they? (Name them)<br>☐ How will they be used?<br>☐ How will they be purchased?<br>☐ What is the per unit cost?<br>☐ How will they be used? | • P.O.s<br>• Internal control processes (only for use in Title IIIA programs)<br>• Federal Programs Handbook policies/procedures |
| | **810**<br>Dues and Fees | ☐ Have we named the conferences for this registration fee?<br>☐ Who will be participating in the conference?<br>☐ For what purpose?<br>☐ How does the activity accomplish the intents and purposes of the EL Parent Engagement Program?<br>☐ Has the level of effectiveness for this activity/strategy/program been labeled? | • Conference Documentation<br>• Redelivery Documentation<br>• Federal Programs Handbook policies/procedures<br>• Effectiveness data / evidence |

| Function | Object | Description Questions Checklist | Title III Documentation |
|---|---|---|---|
| **2210 – Improvement of Instruction -** Includes all activities that enhance the instructional experience of the students. This includes technology | **190 or 191**<br>Teachers, Other Management and other Administrative Personnel | ☐ What is this position?<br>☐ Is this fully funded or split-funded?<br>☐ What is the Title III portion and who is paying the other portion?<br>☐ Is there a corresponding Job Description uploaded in the ConAPP for this position?<br>☐ How does this position accomplish the intents and purposes of the grant?<br>☐ Why is this position necessary?<br>☐ Is the salary reasonable & adheres to LEA Federal Policies/Procedures? | • Job Description<br>• Periodic Certification Forms<br>• Time Logs, if split-funded<br>• Daily work schedule |

| | | | |
|---|---|---|---|
| services, academic coaches, online learning programs for the students, etc. | **199**<br>Other Salaries & Compensation | ☐ Is this additional compensation for someone providing EL-related professional development or doing curricular work to school/district staff?<br>☐ How many staff members are getting this additional compensation?<br>☐ What is the hourly rate?<br>▪ Does the hourly rate match the District's Federal Programs' hourly rate for additional compensation?<br>☐ How many hours (or days) of additional work does this include?<br>☐ How does this align with the District's Title IIIA EL-focused PD Plan?<br>☐ Have we uploaded an informal job/work description?<br>☐ Did we specify the timeframe for the work? Before school, after school, summer, Saturday school, etc.?<br>☐ Did we label the level of effectiveness for this activity/strategy/program? | • Informal job description<br>• Time logs<br>• Agendas, Notes, Other documentation<br>• Deliverables / Artifacts from the work accomplished<br>• Federal Programs Handbook policies/procedures<br>• Effectiveness data / evidence |
| | **200**<br>Benefits | ☐ Are all types of benefits included in this Object Code?<br>☐ Who are all these benefits for?<br>☐ Do the benefits match the personnel in this section? | |
| | **300**<br>Purchased Professional Services | ☐ How do the contracted services improve instruction for ELs?<br>☐ Who is being contracted?<br>☐ What is the contract cost?<br>☐ What deliverables does the contract include?<br>☐ Is the contracted vendor a system employee?<br>☐ Has SAM been checked, if contract is ≥$25,000?<br>☐ Is the label the level of effectiveness for this activity/strategy/program in the descriptor? | • Dated/Timed/Signed PD Participants<br>• Signed Periodic Certification<br>• Copy of contract<br>• Federal Programs Handbook policies/procedures<br>• Effectiveness data / evidence<br>• Other documentation as needed |
| | **432**<br>Repair/Maintenance | ☐ Is this Title III equipment that is being repaired/maintained?<br>☐ Is the repair cost reasonable? Necessary? | • Inventory demonstrating this is Title IIIA equipment being repaired<br>• P.O. demonstrating reasonableness of repair cost |

| | | | |
|---|---|---|---|
| | **441**<br>Rental | ☐ Is the rental of venues for Title III PD only?<br>☐ Have we provided a justification why an outside venue needs to be rented for this PD?<br>☐ Is the rental cost reasonable?<br>☐ Have we specified the venue being rented and its cost? | • P.O. or invoice or contract with rental venue demonstrating dates venue was rented that align with PD documentation AND reasonableness of venue rental<br>• Justification for outside LEA venue rental |
| | **532**<br>Web-based Subscriptions & Licenses | ☐ Is there demonstrated evidence that this software license/subscription increases teachers' capacity to understand and implement curricula, instruction & assessment specific to English Learners?<br>☐ Is the subscription year within the 15-month grant period of performance?<br>▪ If not, have we provided a justification?<br>☐ Did we label the level of effectiveness? | • P.O. or invoice showing dates of subscription within 15-month grant period<br>• Effectiveness data / evidence |
| | **580**<br>Travel | ☐ Who is traveling? (specify the # of personnel)<br>☐ Where are they traveling?<br>☐ What is the conference name?<br>☐ How does this travel accomplish the intent/purposes of the grant?<br>☐ How is it reasonable & necessary?<br>☐ Does it adhere to the LEA's Federal Programs Travel Policies & Procedures?<br>☐ Have we labeled the level of effectiveness for this activity/strategy/program in the descriptor? | • Travel documentation<br>• Federal Programs Handbook policies/procedures<br>• Effectiveness data / evidence |
| | **595**<br>Other Purchased Services | ☐ Are these purchased services for Title III PD only?<br>☐ How do these purchased services improve instruction for ELs?<br>☐ What is the purchase cost?<br>☐ What does that include?<br>☐ Has SAM been checked, if services are ≥$25,000?<br>☐ Have we labeled the level of effectiveness for this activity/strategy/program in the descriptor? | • Dated/Timed/Signed PD Participants<br>• P.O.s or invoices<br>• Service Description<br>• Federal Programs Handbook policies/procedures<br>• Effectiveness data / evidence<br>• Other documentation as needed |

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| | **610**<br>Supplies | ☐ What are the supplies to be purchased?<br>☐ How are they related to the activities in this Function?<br>☐ Who is using them? | • P.O.s<br>• Internal control processes (only for Title IIIA programs)<br>• Federal Programs Handbook policies/procedures |
| | **611**<br>Supplies, Technology Related<br>(ex: flash drives, monitor stands, Kindles, iPads below capitalization threshold) | ☐ Do other federal funds and/or local funds provide these technology related supplies/resources for teachers?<br>☐ How many will be purchased?<br>☐ What is the "per-unit" cost?<br>☐ Who will use them? | • P.O.s<br>• Internal control processes (only for Title IIIA programs)<br>• Inventory processes<br>• Signed/dated annual inventory review<br>• Federal Programs Handbook policies / procedures |
| | **615 & 616**<br>(expendable equipment / expendable computer equipment) | ☐ Do other federal funds and/or local funds provide these items to all teachers?<br>☐ Are these items for Title III PD only?<br>☐ What is the per-unit cost?<br>☐ How many will be purchased?<br>☐ Is it reasonable & necessary?<br>☐ Who will be using them? | • P.O.s<br>• Labeled & Inventoried<br>• Internal control processes (only for Title IIIA programs)<br>• Inventory processes<br>• Signed/dated annual inventory review<br>• Federal Programs Handbook policies / procedures |
| | **642**<br>Books (other than textbooks)<br>and Periodicals | ☐ Specify the names of the books/authors<br>☐ Specify the quantity of books<br>☐ Identify the purpose for these books? | • P.O.s<br>• Internal control processes (only for Title IIIA programs)<br>• Federal Programs Handbook policies / procedures |
| | **810**<br>Dues and Fees | ☐ Have we named the conferences for this registration fee?<br>☐ Who will be participating in the conference?<br>☐ For what purpose?<br>☐ How does the activity accomplish the intents and purposes of the District Title IIIA PD Plan?<br>☐ Has the level of effectiveness for this activity/strategy/program been labeled? | • Conference Documentation<br>• Redelivery Documentation<br>• Federal Programs Handbook policies / procedures<br>• Applicable effectiveness data / evidence |

| Function | Object | Description Questions Checklist | Title III Documentation |
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| **2213 – Instructional Staff Training**<br>Activities associated with the professional development and training of instructional personnel. These include such activities as in-service training (including mentor teachers), workshops, conferences, demonstrations, courses for college credit (tuition reimbursement), and other activities related to the ongoing growth and development of instructional personnel. Training that supports the use of technology for instruction should be | **113**<br>Substitute for Teacher | ☐ Are the substitutes for teachers attending a Title IIIA-funded PL training? (regular substitutes for ESOL teachers are not allowed in Title IIIA ex. Sick, maternity, medical or personal leave) | • Substitute periodic certification |
| | **114**<br>Substitute for Paraprofessional | ☐ Are the substitutes for paraprofessionals attending a Title III training? (regular substitutes for ESOL teachers are not allowed in Title IIIA ex. Sick, maternity, medical or personal leave) | • Substitute periodic certification |
| | **116**<br>PD Stipends | ☐ Are these Professional Development Stipends to teachers for participating in an EL-focused Professional Development Course or Workshop?<br>☐ What is the stipend amount? (reasonable/necessary)<br>☐ Does the Stipend amount match the District's established stipend written in its Financial Policy? | • Source Documentation (agendas, sign-in sheets, rosters, course completion verification, etc.) for Professional Learning<br>• Federal Programs Handbook policies/procedures |
| | **199**<br>Other Salaries & Compensation | ☐ Is this additional compensation for someone providing EL-related professional development to school/district staff?<br>☐ How many teachers are getting this additional compensation?<br>☐ What is the hourly rate?<br>▪ Does the hourly rate match the District's Federal Programs' hourly rate for additional compensation?<br>☐ How many hours (or days) of additional work does this include?<br>☐ How does this align with the District's Title IIIA EL-focused PD Plan?<br>☐ Have we uploaded an informal job/work description?<br>☐ Did we specify the timeframe for the work? Before school, after school, summer, Saturday school, etc.?<br>☐ Did we label the level of effectiveness for this activity/strategy/program? | • Informal job description<br>• Time logs<br>• Agendas, Notes, Other documentation<br>• Deliverables / Artifacts from the work accomplished<br>• Federal Programs Handbook policies/procedures<br>• Effectiveness data / evidence |
| | **200**<br>Benefits | ☐ Are all types of benefits included in this Object Code?<br>☐ Who are all these benefits for?<br>☐ Do the benefits match the personnel in this section? | |

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| included in this code. The incremental costs associated with providing substitute teachers in the classroom (while regular teachers attend training) should be captured in this function code. All costs should be charged to this code regardless of whether training services are provided internally or purchased from external vendors. It should be noted that the salary of a teacher who is attending training would still be reported in function 1000. | **300**<br>Purchased Professional Services | ☐ Who is being contracted?<br>☐ For what are they being contracted?<br>☐ Has the district checked the suspension/debarment list for federal programs for this company/individual if expense is over $25K with one vendor?<br>☐ How do these services accomplish the intent and purposes of the grant?<br>☐ How are these services reasonable & necessary?<br>☐ Did we label the level of effectiveness? | • P.O.s<br>• Signed Contract<br>• PD Attendance Rosters, Agendas, Handouts<br>• Federal Programs Handbook policies/procedures<br>• Effectiveness data / evidence |
| | **580**<br>Travel | ☐ Who is traveling?<br>☐ Where are they traveling?<br>☐ What is the conference name?<br>☐ How does that accomplish the intent/purposes of the grant?<br>☐ Applicable effectiveness label for the activity/strategy/program (matching EL PD Plan effectiveness label) | • Travel Documentation<br>• Federal Programs Handbook policies/procedures<br>• Effectiveness data / evidence for the larger activity/strategy/program this travel was a component of…. |
| | **595**<br>Other Purchased Services | ☐ Are these purchased services for Title III PD only?<br>☐ How do these purchased services improve teachers' practice?<br>☐ What is the purchase cost?<br>☐ What does that include?<br>☐ Has SAM been checked, if contract is ≥$25,000?<br>☐ Applicable effectiveness label for the activity/strategy/program (matching EL PD Plan effectiveness label) | • P.O.s<br>• Dated/Timed/Signed PD Participants<br>• P.O.s or invoices<br>• Service Description<br>• Federal Programs Handbook policies/procedures<br>• Other documentation as needed<br>• Effectiveness data / evidence for the larger activity/strategy/program this travel was a component of…. |
| | **610**<br>Supplies | ☐ What are the supplies to be purchased?<br>☐ How do they accomplish the intent/purposes of the grant?<br>☐ Who is using them? | • P.O.s<br>• Internal control processes (only for Title III programs)<br>• Federal Programs Handbook policies/procedures |

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| | **611**<br>Supplies, Technology Related<br>(ex: flash drives, monitor stands, Kindles, iPads below capitalization threshold) | ☐ Do other federal funds and/or local funds provide these technology related supplies/resources for teachers?<br>☐ How many will be purchased?<br>☐ What is the "per-unit" cost?<br>☐ Who will use them? | • P.O.s<br>• Internal control processes (only for Title III programs)<br>• Inventory processes<br>• Signed/dated annual inventory review<br>• Federal Programs Handbook policies/procedures |
| | **615 & 616**<br>(expendable equipment / expendable computer equipment) | ☐ How many items?<br>☐ What is the per unit price?<br>☐ Is it reasonable & necessary?<br>☐ Who will be using them?<br>☐ Do regular education teacher receive these items through local or other federal funding sources? | • P.O.s<br>• Labeled & Inventoried<br>• Internal control processes (only for Title IIIA programs)<br>• Inventory processes<br>• Signed/dated annual inventory review<br>• Federal Programs Handbook policies/procedures |
| | **642**<br>Books (other than textbooks) and Periodicals | ☐ What books are being purchased?<br>☐ How many?<br>☐ For what? | • P.O.s<br>• Internal control processes (only for Title IIIA programs)<br>• Federal Programs Handbook policies/procedures |
| | **810**<br>Dues and Fees | ☐ Registration for which conferences?<br>☐ What is the focus of this conference?<br>☐ Who is attending?<br>☐ Why?<br>☐ How is it reasonable & necessary?<br>☐ When the conference is a component of the district Title III EL PD Plan, has the effectiveness label been identified? | • P.O.s<br>• Conference Agendas & Attendance Evidence<br>• Redelivery Documentation<br>• Federal Programs Handbook policies/procedures<br>• Effectiveness data / evidence |

***Overarching Question for Functions 2230 + 2300: Have I exceeded the 2% CAP for Direct Administrative Costs?***

| Function | Object | Description Questions Checklist | Title III Documentation |
|---|---|---|---|
| **2230 – General Administration of Grant** | **142** Salary of Secretarial Staff | ☐ Are the secretary's duties related directly to the management of the grant?<br>☐ Is this position partially or fully funded in Title IIIA?<br>☐ Does the job description clearly indicate Title III grant management duties in the Title IIIA portion?<br>☐ Has the job description been uploaded? | • Periodic Certification or split funded time logs<br>• Job Description |
| | **190** Other Management Personnel | ☐ Is the Title IIIA director's salary partially or fully funded in Title IIIA?<br>☐ Does the job description clearly indicate Title IIIA grant management duties in the Title IIIA portion?<br>☐ Has the job description been uploaded? | • Periodic Certification or split funded time logs?<br>• Job Description |
| | **191** Other Administrative Personnel | ☐ Is the Title IIIA director's salary partially or fully funded in Title IIIA?<br>☐ Does the job description clearly indicate Title IIIA grant management duties in the Title IIIA portion?<br>☐ Has the job description been uploaded? | • Periodic Certification<br>• Job Description |
| | **200** Benefits | ☐ Are these for the personnel listed above? | |
| | **430** Repair & Maintenance | ☐ Is this for Title IIIA purchased equipment that is being used to administer and manage the grant? | • P.O.s |
| | **432** Repair & Maintenance – Technology | ☐ Is this for Title IIIA purchased equipment that is being used to administer and manage the grant? | • P.O.s |
| | **580** Travel | ☐ Is this the director's travel to grant management conferences and trainings? | • Travel Documentation<br>• Federal Programs Handbook policies/procedures |
| | **610** Supplies | ☐ Are these reasonable & necessary to manage the grant? | • P.O.s |
| | **611** Supplies – Technology | ☐ Are these reasonable & necessary to manage the grant? | • P.O.s |

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| | **615 & 616**<br>Expendable Equipment | ☐ Are these reasonable & necessary to manage the grant?<br>☐ Are LEA Federal Programs inventory procedures followed? | • P.O.s<br>• Federal Programs Handbook policies/procedures |
| | **810**<br>Dues and Fees | ☐ Is this subscription necessary to manage the grant?<br>☐ Is this a conference registration for the Title IIIA director to attend a conference focused on managing the grant? | • P.O.s<br>• Federal Programs Handbook policies/procedures |
| | **882**<br>Consolidation of Administrative Funds* | ☐ If the LEA is consolidating admin funds, have we budgeted all the 2% of the original allocation here?<br>☐ Did we round up or round down? (must round down any 2% amounts with cents) | **NO DOCUMENTATION NEEDED!** |
| **2300**<br>**Audit Cost & Indirect Costs** | **300**<br>Purchased Professional Services | ☐ Audit Costs | • P.O. |
| | **880**<br>Federal Indirect Costs | ☐ IF the LEA is charging Indirect Costs to Title IIIA, does the Indirect Cost Rate match the LEA's negotiated Federal Programs' Indirect Cost Rate?<br>☐ Have we attached Title III's Indirect Cost Worksheet? | • Copy of LEA's negotiated Indirect Cost Rate<br>• Indirect Cost Worksheet (downloaded from Title IIIA website) |

**Only for LEAs with GaDOE approval to consolidate administrative funds.*

| Function | Object | Description Questions Checklist | Title III Documentation |
|---|---|---|---|
| **2700 - Transportation** | **180**<br>Bus Drivers | ☐ Where are the bus drivers taking the students?<br>☐ Which students?<br>☐ Why?<br>☐ How many hours? Hourly rate?<br>☐ Has the Field Trip Form been completed & uploaded, and pre-approved?<br>☐ Has the summer school been approved?<br>☐ Is the cost reasonable & necessary? | • Bus driver periodic certification<br>• Field Trip Forms in ConAPP as Attachment<br>• List of EL students participating in the activity requiring transportation<br>• Evidence that these EL students represent the same share of the activity that is indicated in the transportation costs. |

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| | | ☐ Is this activity split-funded with other federal programs?<br>▪ If so, does this cost represent the share of EL population in the activity? | |
| | **519**<br>Student Transportation Purchased from Another LUA | ☐ Why are the student transportation services purchased from other sources?<br>☐ What are the sources?<br>☐ How do they support the Title III language programs?<br>☐ How is this reasonable & necessary? | • Contracts<br>• Date/Time services rendered<br>• Description of services rendered |
| | **595**<br>Other Purchased Services | ☐ What are the other purchased services?<br>☐ How do they support the Title III language programs?<br>☐ Are they reasonable & necessary?<br>☐ Does your district pay one transportation cost or pay the drivers and fuel separately?<br>☐ Has the Field Trip Form been completed, uploaded, and pre-approved? | • Contracts<br>• Date/Time services rendered<br>• Description of services rendered<br>• Federal Programs Handbook<br>• Approved Field Trip Forms in ConAPP as Attachment<br>• Federal Programs Handbook |
| | **620**<br>Energy | ☐ Transportation bus fuel costs for what?<br>☐ For whom?<br>☐ Why?<br>☐ Are the fuel costs reasonable & necessary?<br>☐ Has the Field Trip Form been completed, uploaded, and pre-approved? | • Approved Field Trip Forms in ConAPP as Attachment<br>• Federal Programs Handbook |

## Appendix F - Uniform Grants Guidance / EDGAR (selections)

**EDGAR, 2CFR, Part 200, §200.403 *Factors affecting allowability of costs.*** *Except where otherwise authorized by statute, costs must meet the following general criteria in order to be allowable under Federal awards:*

*(a) Be necessary and reasonable for the performance of the Federal award and be allocable thereto under these principles… (p. 131)*

**EDGAR, 2CFR, Part 200, §200.404 *Reasonable costs.*** *A cost is reasonable if, in its nature and amount, it does not exceed that which would be incurred by a prudent person under the circumstances prevailing at the time of the decision was made to incur the costs…In determining reasonableness of a given costs, consideration must be given to:*

*(a) Whether the cost is of a type generally recognized as ordinary and necessary for the operation of the non-Federal entity or the proper and efficient performance of the Federal award.*

*(b) The restraints or requirements imposed by such factors as: sound business practices; arm's-length bargaining; Federal, state, local, tribal, and other laws and regulations; and terms and conditions of the Federal award.*

*(c) Market prices for comparable goods or services for the geographic area.*

*(d) Whether the individuals concerned acted with prudence in the circumstances considering their responsibilities to the non-Federal entity, its employees, where applicable its students or membership, the public at large, and the Federal government.*

*(e) Whether the non-0Federal entity significantly deviates from its established practices and policies regarding the incurrence of costs, which may unjustifiably increase the Federal award's cost. (p. 131)*

**EDGAR, 2CFR, Part 200, §200.405 *Allocable costs.***

*(a) A cost is allocable to a particular Federal award or other cost objective if the goods or services involved are chargeable or assignable to that Federal award or cost objective in accordance with relative benefits received….(p. 132)*

*(d) Direct cost allocation principals: If a cost benefits two or more projects or activities in proportions that can be determined without undue effort or cost, the cost must be allocated to the projects based on the proportional benefit. (p. 132)*

**EDGAR 2 CFR Part 200, §200.303 Internal controls.** The non-Federal entity must: (p. 108-109)

*(a) Establish and maintain effective internal control over the Federal award that provides reasonable assurance that the non-Federal entity is managing the*

*Federal award in compliance with Federal statues, regulations, and the terms and conditions of the Federal award…*

*(b) Comply with Federal statues, regulations, and the terms and conditions of the Federal awards.*

*(c) Evaluated and monitor the non-Federal entity's compliance with statues, regulations, and the terms and conditions of Federal awards.*

*(d) Take prompt action when instances of noncompliance are identified including noncompliance identified in audit findings.*

*(e) Take reasonable measures to safeguard protected personally identifiable information and other information the Federal awarding agency or pass-through entity designates as sensitive….*

**EDGAR, 2 CFR Part 200 §200.302 Financial Management.** *(b) The financial management system of each non-Federal entity must provide for the following: (p. 108)*

*(a) Identification, in its accounts, of all Federal awards received and expended and the Federal programs under which they were received…*

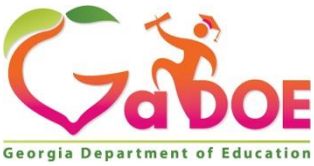
*(b) Accurate, current, and complete disclosure of the financial results of each Federal award or program in accordance with the reporting requirements set forth in §200.327 and §200.328…*

*(c) Records that identify adequately the source and application of funds for federally funded activities…*

*(d) Effective control over, and accountability for, all funds, property, and other assets…(5) Comparison of expenditures with budget amounts for each Federal award.*

*(e) Written procedures to implement the requirements of §200.305 Payment.*

*(f) Written procedures for determining the allowability of costs in accordance with Subpart E – Cost Principles.*

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