TITLE III, PART A PROGRAM GUIDANCE

For Georgia Title III-A Directors – August 31, 2018

The documents included in the Title III, Part A Program Guide (PG) are intended to provide an overview of the authorizing statute, and not an exhaustive description. This PG should be used in conjunction with Georgia's Federal Programs Handbook and the U.S. Department of Education policy guidance. Special thanks are given to all internal and external reviewers, who provided feedback and suggestions.

Table of Contents

Georgia Department of Education
August 31, 2018

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*, seeks to ensure 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 as all students are expected to meet.

This guidance, intended for Georgia administrators of federal Title III, Part A[1] programs, addresses how 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), including through the provision of language support programs, activities that increase the knowledge and skills of teachers who serve ELs, and outreach toward EL families, parents and communities. 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 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) and/or local funding as required under Title VI of the Civil Rights Act of 1964 and the EEOA. Per these laws all States and LEAs must ensure that ELs can participate meaningfully and equally in educational programs and services. **To meet their state/local obligations under Title VI and the EEOA, LEAs must,** for example:

- 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.

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[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: 7/01/2018 – 9/30/2019
Georgia Department of Education
Title III, Part A Allocations

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

Title III, Part A Grant Timeline

Spring

- High EL-incidence 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 the systems.
- Low EL-incidence 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, gather and review data from Title III, Part A Programs.
- Evaluate effectiveness of Title III, Part A Programs.
- Review EL progress toward learning English and achieving State standards.
- Evaluate EL needs for the upcoming year and select Title III, Part A Programs to address EL needs.

Summer

- Independent Title III, Part A LEAs and Consortium Lead LEAs complete and submit annual Title III, Part A report to Georgia Department of Education (GaDOE)
- USDE announces Title III, Part A state award amount to GaDOE
- GaDOE calculates LEA subgrants based on LEAs' EL student numbers (drawn from the March FTE count)
- 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 allocations are presented to the State Board for review and approval
- Research the level of effectiveness (strong, moderate, promising) for selected Title III, Part A activities, strategies, and interventions to be implemented and document each one of these.
- If you can't find one of the three levels of effectiveness (strong, moderate, promising), design Logic Models to be used for selected Title III, Part A activities, strategies, and interventions to be implemented.

- As district CLIPs are approved, Independent LEAs and Consortia Lead LEAs complete Title III, Part A Program Information tab and budget.
- GaDOE Grants Accounting Unit begins loading funds into GaORS
- Participate in Federal Programs Budget Training Webinar
- OPTIONAL: Attend regional Title III, Part A Budget Training Sessions (See Title III, Part A website for dates, times and registration links.)
- Completion Reports for previous fiscal year due **October 30.**
- Review EL and Immigrant records in Student Information Systems for upcoming FTE Count.
- Title III, Part A Budget for current fiscal year due **October 1.**
- First FTE Count (1st Tuesday in October) – Immigrant funding calculated from this FTE Count.
- GaDOE calculates Immigrant funding for eligible LEAs.
- Immigrant allocations are presented to DOE State Board of Education.
- After State Board of Education approval, Immigrant funds are loaded by GaORS
- Regional Title III, Part A Immigrant Budget Training Sessions (Dates, times and registration TBA)

Winter

- Prepare for WIDA ACCESS for ELLs® testing (See ESOL Resource Guide & Assessment Webinars)
- Prepare for CFM monitoring (if applicable)

Title III, Part A: Language Instruction for English Learners Grant

How Allocations are Determined

Around July 1 of each year, the U.S. Department of Education (USDE) awards the Georgia Department of Education multiple formula grants, of which Title III, Part A is one. Upon receipt of this grant, the state must calculate each LEA's individual Title III, Part A allocation. LEAs receive Title III, Part A funding based on a formula prescribed by USDE.

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, Part A, Georgia elects to reserve 5% of its award for this *non-language, 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 record count. 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). Then, each 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 subgrant. LEAs that receive Title III, Part A English learner subgrants 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-allocation 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 LEA Title III, Part A 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 <u>one</u> member-LEA to act as fiscal agent and lead consortium LEA. 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** section, p. 17 and **Annual Reporting Requirements** section, p 20.)

Members of an 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 divisions with a final allocation of $10,000 or more that choose to exit the consortium and manage their Title III, Part A allocation independently.

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 Requirements:
- Adherence to standardized, statewide ESOL entrance and exit procedures **[Sec. 3113(b)(2)]** (*See* current *ESOL Resource Guide for specific criteria*. All ESOL program information is on the ESOL webpage under the Office of Curriculum and Instruction: http://www.gadoe.org/Curriculum-Instruction-and-Assessment/Curriculum-and-Instruction/Pages/English-to-Speakers-of-Other-Languages-(ESOL)-and-Title-III.aspx)

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

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

- Using Title III, Part A funds in ways that build capacity to support ongoing EL content area achievement **[Sec. 3113(b)(3)(E)]**

- LEA certification that all teachers in a Title III, Part A-funded language instructional program/activity are fluent in written and oral English and any other language that may be used for instruction. *This is included in the LEA Title III, Part A Assurances*. **[Sec. 3116(c)]**

- Assurance that the LEA is complying with the Title I parent notification of services requirement. *This is included in the LEA Title III, Part A Assurances*.

- Selection of one or more methods or forms of effective instruction to be used in the supplemental programs and activities provided to assist ELs in reaching English proficiency and meeting content standards **[Sec. 3115(f)(1)]**

Three Required Activities:

Portions of the Title III, Part A funding are required to be used for the following:

1. Provide *effective,* **supplemental language programs** that **demonstrate successes** in increasing ELs' English proficiency <u>and</u> content achievement.

2. Provide *effective* professional development (PD) for **teachers, administrators and other school personnel**. This PD must fulfill four (4) requirements. It 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 *(such as Georgia's Title I Parent-School Partnership programs).*

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 may be authorized to undertake certain specified 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. **[Sec. 3115(d)]**

Title III, Part A: Immigrant Students Grant

How 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

LEAs qualify for the 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 2016 an LEA enrolled 104 qualified immigrant students (see above for definition of *immigrant*) and in 2017 it served 111 immigrant students, its two-year average is 58. To receive an Immigrant grant, it must show a *significant increase* over that student average of 58. 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, it must be determined whether its current population constitutes a *significant increase* over the previous two-year average. For each LEA whose October FTE count indicates enrollment of 50 or more immigrant students, its two prior years' immigrant counts will be averaged. If the current count represents an increase of 10% or more over the average, the LEA qualifies for an Immigrant grant. *(See **Appendix C** for more details on Immigrant subgrant calculations.)*

The $10,000 minimum allocation requirement does not apply to Immigrant grants; therefore, it is possible for an LEA to receive an Immigrant allocation despite not meeting the minimum allotment for an EL allocation.

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:

- 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)

Title III, Part A is an important part of the LEA's Consolidated LEA Improvement Plan (CLIP). See the Federal Program's Handbook and the CLIP guidance for more information.

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 the CLIP and the EL Program Information Tab (also called the budget worksheet).

General Title III, Part A Assurances

The following Assurances 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, if the LEA wishes 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.

- **The LEA complies with standardized statewide EL entrance and exit procedures. [SEC. 3113(b)(2)]**
- **The LEA assures that all potential English Learners are screened within 30 days of enrollment. [SEC. 3113(b)(2)]**
- **The LEA assures compliance with the Title I requirement to test 100% of ELs on the ACCESS for ELLs® assessment. [Sec. 3113(b)(3)(B)]**
- **The LEA assures that all teachers in any Title III, Part A-funded language instruction educational program/activity are fluent in written and oral English. [SEC. 3116(c)]**

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

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

Georgia Department of Education
August 31, 2018

- **Click Consolidated Application>Application>Title Programs**

- **Select your district from the drop-down menu, then select search and your district will appear in the Application List.**

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

Georgia Department of Education
August 31, 2018

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

Application ▷					
Reports ▷	Title I-C, Migrant Education	Single District	Program Manager Revision Requested	New	Amendment No. 2
Online Help					
	Title II-A, Improving Teacher Quality	Single District	Approved	Program Manager Signed Off	Original
👤 Tammie Smith	Title II-A, Improving Teacher Quality	Single District	Approved	New	Amendment No. 1
Account Information	Title II-A, Improving Teacher Quality	Single District	New	New	Amendment No. 2
Add to Favorites	Title VI-B, Rural and Low Income	Single District	Approved	Program Manager Signed Off	Original
Help - Dticket	Title VI-B, Rural and Low Income	Single District	Approved	Program Manager Signed Off	Amendment No. 1
	Title VI-B, Rural and Low Income	Single District	Superintendent Signed Off	Program Manager Signed Off	Amendment No. 2
Hide Navigation ◀	**Federal Grants**				
	Program	Applied As	Budget Status	DC Status	Program Type
	Title III-A, Immigrant - 681	Single District	Approved	New	Original
	Title III-A, Immigrant - 681	Single District	Approved	New	Amendment No. 1
	Title III-A, Language Instruction for English Lear	Single District	Approved	New	Original
	Title III-A, Language Instruction for English Lear	Single District	Approved	New	Amendment No. 1
	Title III-A, Language Instruction for English Lear	Single District	Approved	New	Amendment No. 2
	State Grants				
	Program	Applied As	Budget Status	DC Status	Program Type
	Professional Learning	Single District	Approved	New	Original

Best viewed with Internet Explorer 6.0 or higher and Screen Resolution 1024 x 768 or greater

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

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

- **Use the text boxes provided to respond to each of the five questions. However, questions #2 & #3 do not apply to an LEA consolidating <u>all</u> its Title III, Part A funds in its Title I schoolwide schools and Question #5 <u>only</u> 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 Tab

Elements of this tab, in addition to elements of the CLIP, are reviewed to ensure that the LEA is providing compliant language instruction programs, professional learning and parent/family engagement activities, as per Title III, Part A law. The 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 of 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)]

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

The LEA monitors its own and its schools' Title III, Part A expenditures to ensure that the funds are used to supplement, and not supplant, state, local, and other federal funds, and the Title III, Part A unit of the GaDOE verifies compliance with this requirement when it performs its onsite and desktop Title III, Part A monitoring of Independent Title III, Part A LEAs and the Lead LEA of Consortia.

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."

It may be important to note that the often-discussed provision in Section 1118(b) of the ESEA setting forth requirements that **Title I** subgrant funds supplement and not supplant non-Federal funds does not apply to Title III, Part A. **Title III, Part A does, however, contain its own provision** prohibiting supplanting of other Federal, State, and local funds, and that provision was not changed by the ESSA. (See Section 3115(g) of the ESEA).

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).

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.

Title III, Part A Budgeting

Budget Timeline – Please follow the Title I Budget Submission Timeline

- 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 Georgia Department of Education Title III, Part A Team provides LEAs with budget training via regional webinars scheduled during the month of **August**. Additionally, the Title III, Part A unit has developed a Title III, Part A-specific Chart of Accounts and *Guiding Questions Budget Chart* which are included as **Appendices E** and **F**. The *Guiding Questions* chart may assist LEAs in determining the allocability 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 increases our ability to approve budgets in their initial review.

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 call your Title III, Part A Regional Program Specialist 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 at http://www.gadoe.org/School-Improvement/Federal-Programs/Pages/Federal-Programs-Handbook.aspx) Title III, Part A costs for additional compensation to employees working off-contract 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 *Chart of Accounts* has been created for you directly from the state Chart of Accounts. (See the Title III, Part A website http://www.gadoe.org/School-Improvement/Federal-Programs/Pages/Title-III-Guidance.aspx or **Appendix E**.) The Function and Object Codes found in the Title III, Part A *Chart of Accounts* will be those made available for Title III, Part A 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 your District's Financial Accounting.
- Follow the Title III, Part A *Chart of Accounts* (**Appendix E**)
- Provide as much detail as possible in the line item descriptions. See Common Errors 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)]

- The 2% Direct Administrative Expenses <u>must not</u> be calculated on carryover funds. Only the Original Allocation may have the 2% direct administrative cost assigned to it.
- All expenditures in Function # Codes 2230 and 2300 (not to include indirect costs) will be calculated in the 2% Direct Administrative Cost

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 at http://www.gadoe.org/School-Improvement/Federal-Programs/Documents/handbook/OVERARCHING%20Information%20Master%208.2.2018%20MASTER%20FINAL.pdf

Beginning with the FY19 budget, LEAs must identify the Level of Effectiveness for items 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, they are welcome to design a Logic Model instead as a means to collect effectiveness data. Templates for LEA use can be found on the Federal Programs website and the Title III, Part A program website.

Common Budgeting Errors:
Lack of consistency
- If a salary or proportion of a salary is in the budget, ensure that the benefits 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.
- Indicate the percentage of voice/data costs to be charged to Title III, Part A.
- Correlate any voice/data charges to the proportion of salary charged to Title III, Part A.

Spending the Funds

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 *Administrator's Handbook on EDGAR*, 3rd Edition (2015). 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?" PowerPoint Presentation from the Federal Programs' Summer Conference 2018 found at: https://eventmobi.com/api/events/23329/documents/download/4d9edae4-b67f-4f25-bbe4-d42e97882b4f.pdf/as/Evidence-based%20Strategy%20or%20Intervention_%206.8.18.pdf

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.

- 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.
- Budget items for additional compensation to employees working off-contractual hours must include an informal job description of the Title III-compensated additional work to be performed.

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 or not 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, up to 25% of an original subgrant may be carried over into the next fiscal year. This carryover amount must be underlined completely spent in the following fiscal year, no exceptions. Any funds left unspent are returned to the GaDOE.
- Title III, Part A does not allow a District to submit a waiver for the carryover amount.
- When an LEA receives the official letter from the GADOE Grants Accounting Office announcing the Carry-Over Amount (**superintendent receives this letter**), the LEA has 45 days from the letter date to amend its budget to account for these additional funds. (This is done via the submission of a Budget Amendment for 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. (p. 113)*

- After your budget is approved by the Department, any transfer of funds from one function or object code to another would require a Budget Amendment to be submitted.
- Any Budget Amendment must be supported by the EL-related elements in the LEA's CLIP to show alignment with LEA initiatives.
- LEAs may submit a budget amendment in the Consolidated Application Portal until the federal programs award period of performance ends on September 30.
- Budget amendments are subjected to a comprehensive review process, which includes a review of the original budget.

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 are: 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:** FY19ApplingTitleIII-ALEP_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.
- <u>The Job Description Title **must** match the Job Title in the Budget</u>

Title III Educational Field Trip Approval Form

All requests for student field trips in either the Title III, Part A- A English Learner or Title III, Part A Immigrant Budgets **must** be accompanied by a completed *Field Trip Approval Form* uploaded in the Attachments Tab in 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:** FY19ApplingTitleIII-A ELFieldTripForm

The *Field Trip Approval* form template can be found on main page of the Title III, Part A Website, under **For Districts**.

Immigrant Program Information Tab & Budget

For LEAs allocated Immigrant subgrants, the Immigrant Program Information tab must be completed in concert with the Immigrant budget. Activities led by the LEA using Immigrant funds must be described in 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 Information question(s) and may only be made in support of allowable activities under the grant (*see p. 8.*) Districts must be careful to ensure that Immigrant supports are not language-focused but rather cultural/social-focused as federal monitors are very sensitive to this issue.

Note: If IMM and EL funds are co-mingled to fund the same type of activities, please clarify the percentage of funds used from each 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 in helping 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 an assessment of their risk. The Cross-Functional Monitoring process (CFM) includes staff from all Title I units, Title II, Title III, Part A, Title IV, IDEA, as well as staff from other departments/units. 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 - Federal Programs Monitoring website.

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.

To guide LEAs through the monitoring process, each Regional Title III, Part A Specialist provides 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 specialist, which will include the date, time and link for a live GoToWebinar training session giving participants an opportunity to learn details about the monitoring process and the required submissions as well as ask questions of their Title III, Part A monitor.

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 their assigned, live GoToWebinar training session. Questions related to these sessions should be directed to the LEA's assigned regional Title III, Part A Regional Specialist.

Will an LEA be Monitored Desktop or Onsite?

Federal Programs communicates with Superintendents of LEAs on the monitoring cycle to start the process of scheduling the onsite CFM date. Since it is possible for more than one CFM Onsite LEA visit to be scheduled by Federal Programs on the same date in different regions, creating a "double-booking" for the Title III, Part A Specialist assigned to those LEAs, the Title III, Part A Unit may designate some LEAs as Desktop Monitored, instead of Onsite. This designation will not occur until Federal Programs has scheduled all the onsite CFM visits for a monitoring cycle year, most likely in September each year.

The Desktop monitoring process does not include the onsite group interviews nor EL parent telephone interview components. Some CFM monitoring must be conducted via a review of monitoring documentation submitted electronically – hence the term Desktop.

Monitoring Support Documents

On the *Federal Programs – Title III, Part A* website is a section entitled "Title III, Part A Monitoring Documents". (http://www.gadoe.org/School-Improvement/Federal-Programs/Pages/Title-III-Monitoring-Documents.aspx) All LEAs are welcome and encouraged to review these documents to become familiar with what is required and will be requested of them when Title III, Part A monitoring is conducted in their LEA. *Those previewing these documents outside of their assigned monitoring year however, must recognize that monitoring processes may change slightly from one year to the next.* The training webinars provide specific guidance on how LEAs should use these documents as they prepare to be monitored.

LEAs may also wish to review the Cross-Functional Monitoring Indicators document that regional monitors use to review LEA programs and services offered under Title III, Part A. Title III will monitor **three Overarching Indicators (1, 3, and 5**) and five Title III, Part A-specific indicators (**Indicator 19.1, 19.2, 19.3, 19.4, & 19.5)** in the CFM Indicators document for a total of eight indicators. (http://www.gadoe.org/School-Improvement/Federal-Programs/Documents/Cross%20Functional%20Monitoring/FY19%20CFM%20Document%20Master%208.20.2018.pdf)

The supporting documents are organized by **Onsite** and **Desktop** monitoring. The supporting documentation must be organized in files named after each *CFM Indicator/Element Number*. See the *Organization for Monitoring (Sample)* document at http://www.gadoe.org/School-Improvement/Federal-Programs/Pages/Title-III-Monitoring-Documents.aspx These files, along with the *LEA Monitoring Data Rosters* excel spreadsheet must be submitted to the GaDOE in the secure GaDOE Portal messaging system, on the following dates:

1. Desktop documentation is submitted to the GADOE via the secure ConAPP portal **on** the CFM scheduled date. LEAs that are monitored via the Desktop process do not have parent or staff interviews conducted and, therefore, the GaDOE Desktop monitoring templates do not require LEAs to submit contact information for these groups.
2. Onsite monitoring documentation will be submitted to the GaDOE **four weeks** prior to the scheduled CFM onsite visit.

LEAs will have the option to submit Monitoring Files on a flashdrive via snail mail, if they prefer not to use the GADOE Portal messaging system. Files must be zipped before attaching to a message in the Portal – and the message will only allow one Monitoring Indicator File per message.

In addition, after the Fall 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 2018 (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 Monitoring Documentation submitted either **4 weeks before** the CFM onsite date (for Onsite LEAs) or **on the actual CFM** scheduled date (for Desktop LEAs). 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 (beginning in Fall 2018), and two years of ACCESS for ELLs scores (or other state's language assessment scores). Because it contains PII, it must be submitted either through the Portal messaging system or on the flash drive mailed to the regional specialist in charge of monitoring.

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.

The LEA will submit, one week prior to the CFM onsite visit, the completed *Data Related to Monitoring* form downloaded from 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 **4 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 Language Line 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 staff for three group interviews: administrators of high-density EL schools, regular education teachers of ELs, ESOL teachers of ELs. A fourth interview will be conducted with the Title III Director and any other Title III-funded personnel.
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 process completion.

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 **4 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.

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.

Post-Monitoring

Following the onsite visit/desktop review, the Title III, Part A Specialist has **30 days** to complete the monitoring report. The report is submitted electronically through the GaDOE Monitoring Portal and is reviewed by the Title III, Part A Program Manager who, upon approval, submits it to the Federal Programs Director for final review and approval. Once fully approved, it will be released to the LEA for review and response (if necessary). **Note**: Each LEA has <u>self-selected</u> the staff that are permitted Monitoring Portal access. 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. The LEA's plan must result in findings being fully corrected within **one year** with interim dates provided for progress checks/document submissions.

Corrective Action Plans are due **30 days** after the LEA receives the monitoring report from the GaDOE. 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 Regional 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 regional specialist will conduct a follow-up review of the LEA's 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 specialist.

Title III, Part A Annual Reporting Requirements

In the spring of each year, LEA Title III, Part A recipients (both Independent and Consortium Lead LEAs) must submit to the GaDOE information and data as required by USDE for the annual Consolidated State Performance Report (CSPR). This report provides the State and USDE with information about the performance of those ELs who are/were served under the LEA's Title III, Part A program. *Do not include in this report any ELs who were **not** Title III, Part A-served. (See* **Data Collections** *Student Record Data Elements* for more information about coding Title III, Part A-served and not-served ELs).

The required elements are included on a form, called "**Title III, Part A LEA Annual Report**," which is posted each spring on the Title III, Part A web page under *Title III, Part A Resources*. This form must be completed, signed by the Title III,

Georgia Department of Education
August 31, 2018

Part A director and LEA superintendent and submitted in **hard copy** to the Title III, Part A unit by **July 1** of each year. These reporting requirements can be found in Sec. 3121 of Title III, Part A law and are also listed below.

(1) 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;

(2) 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;

(3) 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);

(4) the number and percentage of English learners who exit the language instruction educational programs based on their attainment of English language proficiency;

(5) 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;

(6) 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

(7) any other information that the GaDOE may require.

2018- 2019 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)

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.

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.

Georgia Department of Education
August 31, 2018

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.

Signatures of Authorized Representatives:

_____	_____
Print Name	Print Name
Consortium Lead LEA Representative or Designee) (Superintendent or Designee)	Consortium Member LEA Representative (Superintendent or Designee)
_____	_____
Signature of Consortium Lead LEA Representative (WCSD)	Signature of Member LEA Representative
_____	_____
Date	Date
_____	_____
Print Name	Print Name
Consortium Member LEA Representative or Designee) (Superintendent or Designee)	Consortium Member LEA Representative (Superintendent or Designee)
_____	_____
Signature of Consortium Member LEA Representative	Signature of Member LEA Representative
_____	_____
Date	Date
_____	_____
Print Name	Print Name
Consortium Member LEA Representative or Designee) (Superintendent or Designee)	Consortium Member LEA Representative (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 Name	# Immigrant Students Reported in Current Year	LEA meets minimum number for Immigrant grant?	# Immigrant Students Reported Year One (2015-2016)	# 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 Years?
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.

> (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 <u>Title III, Part A purposes only</u> 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 – 2018-2019 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	

Georgia Department of Education
August 31, 2018

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			

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

For Commonly Used Budget Codes
FY19 Title III-A EL & Immigrant Grant FAIN: S365A180010

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

Function	Object	Description Questions Checklist	Title III Documentation to Maintain
1000 – Use for items directly related to the instruction of pupils	140	☐ Is the aide or paraprofessional working only with English Learners? ☐ Fully funded or split-funded? ☐ What is the Title III portion and who is paying the other portion? ☐ Is the Job Description uploaded? ☐ What's the level of effectiveness for a paraprofessional?	• Job Description • PARs or Time Log • Student Roster • Research on effectiveness with ELs and/or District data as evidence of effectiveness • Other documentation as necessary
	199	☐ Is this additional compensation for an employed teacher working off-contract hours? ☐ Pay rate per hour? ☐ Is this rate the typical district rate per hour for this type of work? ☐ How many hours? ☐ How many teachers? ☐ Have you uploaded an *informal job/work description*? ☐ What's the level of effectiveness for tutoring or whatever these teachers are doing?	• Dated/Timed/Signed Teacher Attendance Rosters • Dated/Timed/Signed Student Attendance Rosters • Lesson Plans and/or other instructional documentation • Signed Periodic Certification • Job/Work Description • Research on effectiveness with ELs and/or District data as evidence of effectiveness • Other documentation as necessary
	210	☐ State Health for whom?	
	220	☐ FICA for whom? Medicare for whom?	
	230	☐ TRS for whom?	
	260	☐ Workers Comp for whom?	
	290 - 292	☐ Other benefits for whom? Which benefits?	
	300	☐ Contracted tutoring? How many hours of service? ☐ Credentials of tutors for working with ELs?	• Dated/Timed/Signed Tutor Attendance Rosters
		☐ For which students? ☐ Which contracting company? ☐ Has the district checked the suspension/debarment list for federal programs for this company/individual? ☐ What's the level of effectiveness for this vendor?	• Dated/Timed/Signed Student Attendance Rosters • Lesson Plans and/or other instructional documentation • Signed Periodic Certification • Contract Description • Federal Programs Handbook policies/procedures • Research on effectiveness with ELs and/or District data as evidence of effectiveness • Other documentation as necessary
	532	☐ Do regular education students use this same software? How is the software funded for them? ☐ Will only ELs use this software? ☐ What is the subscription year for these licenses? (must benefit the ELs in this grant period) ☐ What is the name of the instructional software? ☐ Is it designed to increase the academic English language proficiency of English Learners? Is it effective? ☐ What's the level of effectiveness for these software programs?	• P.O.s • Research on effectiveness with ELs and/or District data as evidence of effectiveness • Other documentation as necessary

	610	☐ Are these consumable instructional resources only for ELs' language instruction in the supplemental Title III program? ☐ Are these instructional resources that enhance/expand the existing language program (ESOL)? ☐ Are these manipulatives, flashcards, or other type of resources? ☐ Do other federal funds and/or local funds provide these supplies for regular ed students? ☐ Have you specified the resources, and named most of them? ☐ Do these resources benefit the ELs in this grant period? ☐ What is the "per-unit" cost?	• P.O.s • Labeled & Inventoried • Internal control processes • Inventory processes • Other documentation as necessary
	611 – Supplies, Technology Related (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? ☐ How many will be purchased? ☐ What is the "per-unit" cost? ☐ Who will use them? ☐ If it is headsets, will they be used for assessment?	• P.O.s • Labeled & Inventoried • Internal control processes • Inventory processes • Federal Programs Handbook policies/procedures • Other documentation as necessary
	615 – Expendable equipment	☐ Do regular education students use this same resource? How is it purchased for them? ☐ What is the "per-unit" cost? ☐ Who will be using them? Will only ELs use these electronic devices? ☐ How is it reasonable & necessary?	• Labeled & Inventoried • Internal control processes (only for EL use in the Title III program) • Inventory processes • Federal Programs Handbook policies/procedures • Other documentation as necessary
	616 – Expendable Computer Equipment (ex: printers, computers, etc.)	☐ How many computers? Printers? ☐ What is the per unit cost? ☐ How is it reasonable & necessary? ☐ Who will be using them? ○ Will only ELs use this expendable equipment? ☐ Do regular education students receive these items through local or other federal funding sources?	• P.O.s • Labeled & Inventoried • Internal control processes (only for EL use in the Title III program) • Inventory processes • Federal Programs Handbook policies/procedures • Other documentation as necessary
	641	☐ Are these supplemental textbooks (i.e. the District has already purchased ESOL textbooks)? ☐ Are they designed to increase the academic English language proficiency of English Learners? Are they effective in doing so? ☐ What is the name of the books? ☐ How many will be purchased? ☐ What is the per unit cost? ☐ What's the level of effectiveness for these resources? ☐	• P.O.s • Research on effectiveness with ELs and/or District data as evidence of effectiveness • Labeled & Inventoried • Internal control processes • Inventory processes • Federal Programs Handbook policies/procedures • Other documentation as necessary •
	642	☐ Are these print resources other than textbooks? ☐ What are they? (Name them) ☐ How will they be used? ☐ How many will be purchased? ☐ What is the per unit price? ☐ What's the level of effectiveness for these resources?	• P.O.s • Research on effectiveness with ELs and/or District data as evidence of effectiveness • Labeled & Inventoried • Internal control processes • Inventory processes • Federal Programs Handbook policies/procedures • Other documentation as necessary
	810	☐ Is this a subscription fee or a license or registration? ☐ How much is each fee? ☐ How does the activity accomplish the intents and purposes of the grant? ☐ For how many EL students? (summer registration fees) ☐ What's the level of effectiveness for these resources? ☐	• Student registration documentation • Other documentation as needed • Federal Programs Handbook policies/procedures • Research on effectiveness with ELs and/or District data as evidence of effectiveness • Other documentation as necessary

2100 – EL Parent & Pupil Services	142	☐ Does this clerical position solely support the Title III language programs?	• Student Rosters • Job Description • Periodic Certification • Time Logs if split-funded • Other documentation as needed
	172 & 173	☐ Does the District use local/other state or federal funds to provide a student advisor or counselor specifically for English Learners? ☐ Will this position be above & beyond the EL counselors already provided? ☐ Will the person in this position only work with EL students participating in the EL language program? ☐ Job Description uploaded? ☐ What's the level of effectiveness for these positions? ☐	• Student Rosters • Job Description • Periodic Certification • Time Logs if split-funded • Other documentation as needed • Research on effectiveness with ELs and/or District data as evidence of effectiveness
	176	☐ Does the District use local/other state or federal funds to provide a school social worker specifically for English Learners? ☐ Will this position be above & beyond the school social workers already provided? ☐ Will the person in this position only work with EL parents of students participating in the Title III language programs? ☐ Job Description uploaded? ☐ What's the level of effectiveness for these positions?	• Student Rosters • Job Description • Periodic Certification • Time Logs if split-funded • Other documentation as needed • Research on effectiveness with ELs and/or District data as evidence of effectiveness
	177	☐ Is this a Parent Involvement position supplemental to Title I? ☐ Has the Job Description been uploaded? ☐ Is this position fully funded or split-funded? ☐ If so, what is the Title III portion and who is paying the other portion? ☐ What's the level of effectiveness for these positions?	• Job Description • Periodic Certification • Time Logs if split-funded • Parent Event Yearly Plan/Schedule, Agendas, Attendance Rosters, Surveys, Feedback, and related documentation
			• Research on effectiveness with ELs and/or District data as evidence of effectiveness
	199	☐ Is this additional compensation for someone working with parents or providing other services to students? ☐ What's the level of effectiveness for this type of work?	• Informal job description • Student rosters • Time logs • Agendas, Notes, Other documentation • Research on effectiveness with ELs and/or District data as evidence of effectiveness
	220 - 292	☐ Benefits (see 1000)	
	530	☐ Who is traveling? ☐ Why are they traveling? ☐ Where are they traveling? (specify)	• Travel Documentation • Federal Programs Handbook policies/procedures
	610	☐ What supplies? Have you specified them? ☐ For which parents? ☐ Why? ☐ Reasonable & Necessary?	• P.O.s • Labeled & Inventoried, unless consumable • Internal control processes • Inventory processes • Federal Programs Handbook policies/procedures
	611 – Supplies, Technology Related (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? ☐ How many will be purchased? ☐ What is the "per-unit" cost? ☐ Who will use them?	• P.O.s • Labeled & Inventoried • Internal control processes • Inventory processes
	615 & 616 (expendable equipment / expendable computer equipment)	☐ How many items? ☐ What is the per unit price? ☐ Is it reasonable & necessary? ☐ Who will be using them? ☐ Do regular education students receive these items through local or other federal funding sources? ☐ Will only ELs or their parents use these items	• P.O.s • Labeled & Inventoried • Internal control processes • Inventory processes • Federal Programs Handbook policies/procedures
	810	☐ Conference registration? What conference? ☐ For Whom? ☐ For what purpose?	• Conference Documentation • Federal Programs Handbook policies/procedures
2100 – EL Parent & Pupil Services		☐ What's the level of effectiveness for this type of conference/PD?	• Research on effectiveness with ELs and/or District data as evidence of effectiveness

2210 – Improvement of Instruction -	• includes all activities that enhance the instructional experience of the students. This includes technology services, academic coaches, online learning programs for the students, etc.		
	110 or 190 or 191	☐ What is this position? ☐ Is this fully funded or split-funded? ☐ What is the Title III portion and who is paying the other portion? ☐ Is there a corresponding Job Description uploaded in the ConAPP for this position? ☐ How does this position accomplish the intents and purposes of the grant? ☐ Job Description uploaded? ☐ What's the level of effectiveness for this position?	• Job Description • Periodic Certification Forms • Time Logs if split-funded • Research on effectiveness with ELs and/or District data as evidence of effectiveness
	220 - 292	☐ Benefits (see 1000)	See other Function Codes
	300	☐ Do the contracted services improve instruction for ELs?	See other Function Codes
	432	☐ Is this Title III equipment that is being repaired/maintained?	See other Function Codes
	441	☐ Is the rental of venues for Title III PD only?	See other Function Codes
	532	☐ Is there demonstrated evidence that this software license/subscription increases teachers' capacity to understand and implement curricula, instruction & assessment specific to English Learners? ☐ Is the subscription year within the 15-month grant period of performance?	• Research on effectiveness with ELs and/or District data as evidence of effectiveness • P.O.s showing date of purchase
	580	☐ Who is travelling? ☐ Where are they traveling? ☐ What is the conference name? ☐ How does that accomplish the intent/purposes of the grant? ☐ What is the level of effectiveness for participation in these types of conferences or the follow-up activities required?	• Travel Documentation • Federal Programs Handbook policies/procedures • Research on effectiveness with ELs and/or District data as evidence of effectiveness
	595	☐ Are these purchased services for Title III PD only? ☐ What is their level of effectiveness?	• P.O.s • Other documentation • Research on effectiveness with ELs and/or District data as evidence of effectiveness

	610 – supplies	☐ What are the supplies to be purchased? ☐ How do they accomplish the intent/purposes of the grant? ☐ Who is using them?	• See other Function Codes
	611 – Supplies, Technology Related (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? ☐ How many will be purchased? ☐ What is the "per-unit" cost? ☐ Who will use them?	• P.O.s • Labeled & Inventoried • Internal control processes • Inventory processes • Federal Programs Handbook policies/procedures
	615 & 616 (expendable equipment / expendable computer equipment)	☐ Do other federal funds and/or local funds provide these items to all teachers? ☐ Are these items for Title III PD only? ☐ What is the per-unit cost? ☐ How many will be purchased? ☐ Is it reasonable & necessary? ☐ Who will be using them?	• P.O.s • Labeled & Inventoried • Internal control processes • Inventory processes • Federal Programs Handbook policies/procedures
	642 – professional books	☐ Specify the names of the books/authors ☐ Specify the quantity of books ☐ Purpose for these books?	• P.O.s • Labeled & Inventoried • Internal control processes • Inventory processes • Federal Programs Handbook policies/procedures
	810	☐ Registration for which conferences? ☐ Who is attending? ☐ Why? ☐ What is the level of effectiveness for participation in these types of conferences or the follow-up activities required?	• P.O.s • Conference Agendas & Attendance Rosters • Redelivery Documentation • Federal Programs Handbook policies/procedures • Research on effectiveness with ELs and/or District data as evidence of effectiveness

2213 – Instructional Staff Training	**Instructional Staff Training –** 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 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.	
	113	☐ Are the substitutes for teachers attending a Title III training?	• Substitute periodic certification
	114	☐ Are the substitutes for teachers attending a Title III training?	• Substitute periodic certification
	116	☐ Are you paying Professional Development Stipends to teachers for participating in a Professional Development Course or Workshop? ☐ Does the Stipend amount match the District's established stipend written in its Financial Policy? ☐ What is the stipend amount? (reasonable/necessary)	• Source Documentation (agendas, sign-in sheets, rosters, course completion verification, etc.) for Professional Learning • Federal Programs Handbook policies/procedures
	220 - 290	☐ Benefits (see 1000)	
	300	☐ Who is being contracted? ☐ For what are they being contracted? ☐ Has the district checked the suspension/debarment list for federal programs for this company/individual? ☐ How do these services accomplish the intent and purposes of the grant? ☐ What is the level of effectiveness for participation in this PD workshop or the follow-up activities required?	• P.O.s • Signed Contract • PD Attendance Rosters, Agendas, Handouts • Federal Programs Handbook policies/procedures • Research on effectiveness with ELs and/or District data as evidence of effectiveness
	580	☐ Who is traveling? ☐ Where are they traveling? ☐ What is the conference name? ☐ How does that accomplish the intent/purposes of the grant?	• Travel Documentation • Federal Programs Handbook policies/procedures
	595	☐ Are these purchased services for Title III PD only? ☐ What is their level of effectiveness?	• P.O.s • Other documentation • Research on effectiveness with ELs and/or District data as evidence of effectiveness
	610 - Supplies	☐ What are the supplies to be purchased? ☐ How do they accomplish the intent/purposes of the grant? ☐ Who is using them?	• P.O.s • Labeled & Inventoried • Internal control processes • Inventory processes • Federal Programs Handbook policies/procedures
	611 – Supplies, Technology Related (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? ☐ How many will be purchased? ☐ What is the "per-unit" cost? ☐ Who will use them?	• P.O.s • Labeled & Inventoried • Internal control processes • Inventory processes • Federal Programs Handbook policies/procedures
	615 & 616 (expendable equipment / expendable computer equipment)	☐ How many items? ☐ What is the per unit price? ☐ Is it reasonable & necessary? ☐ Who will be using them? ☐ Do regular education teacher receive these items through local or other federal funding sources?	• P.O.s • Labeled & Inventoried • Internal control processes • Inventory processes • Federal Programs Handbook policies/procedures
	642	☐ What books are being purchased? ☐ How many? ☐ For what?	• P.O.s • Labeled & Inventoried • Internal control processes • Inventory processes • Federal Programs Handbook policies/procedures
	810	☐ Registration for which conferences? ☐ Who is attending? ☐ Why? ☐ What is the level of effectiveness for participation in these types of conferences or the follow-up activities required?	• P.O.s • Conference Agendas & Attendance Rosters • Redelivery Documentation • Federal Programs Handbook policies/procedures • Research on effectiveness with ELs and/or District data as evidence of effectiveness

2230 – General Administration of Grant	142	☐ DIRECT Administration Costs ☐ Are the total **DIRECT Admin costs** in 2230 and **AUDIT costs** in 2300 ≤ 2% of the Original Allocation?	See other Function Codes
	190	☐ Is this a portion of the Director's salary? What %age? ☐ Job Description?	See other Function Codes
	191	☐ Is this a portion of the Director's salary? What %age? ☐ Job Description?	See other Function Codes
	200 Benefits	☐ (see other Function Codes for question ideas)	See other Function Codes
	430	☐ (see other Function Codes for question ideas)	See other Function Codes
	432	☐ (see other Function Codes for question ideas)	See other Function Codes
	530 communications	☐ (see other Function Codes for question ideas)	See other Function Codes
	610	☐ (see other Function Codes for question ideas)	See other Function Codes
	611	☐ (see other Function Codes for question ideas)	See other Function Codes
	615 & 616	☐ (see other Function Codes for question ideas)	See other Function Codes
	810	☐ (see other Function Codes for question ideas)	See other Function Codes
2300 Audit Cost & Indirect Costs	300	☐ Audit Costs	
	880	☐ Federal Indirect Costs	
2700 – Transportation	180	☐ Where are the bus drivers taking the students? ☐ Which students? ☐ Why? ☐ How many hours? Hourly rate? ☐ Has the Field Trip Form been Completed & Uploaded?	• Bus driver periodic certification • Field Trip Forms in ConAPP as Attachment
	519	☐ What are the student transportation services purchased from other sources? ☐ What are the sources? ☐ How do they support the Title III language programs? ☐ Are they reasonable & necessary?	• Contracts • Date/Time services rendered • Description of services rendered
	595	☐ What are the other purchased services? ☐ How do they support the Title III language programs? ☐ Are they reasonable & necessary? ☐ Does your district pay one transportation cost or pay the drivers and fuel separately? ☐ Has the Field Trip Form been Completed & Uploaded?	• Contracts • Date/Time services rendered • Description of services rendered • Federal Programs Handbook • Complete & upload Field Trip Forms in ConAPP as Attachment • Federal Programs Handbook
	620	☐ Transportation bus fuel costs for what? ☐ For whom? ☐ Why? ☐ Are the fuel costs reasonable & necessary? ☐ Has the Field Trip Form been Completed & Uploaded?	• Complete & upload Field Trip Forms in ConAPP as Attachment • Federal Programs Handbook

- 1000
- 2100
- 2210
- 2213
    - o 113 – Substitute/Temporary Employee
    - o 114 – Substitute/Temporary Employee
    - o 116 – Professional Development Stipends
    - o 200 – All Benefit Categories
    - o 300 – Purchased Professional and Technical Services
    - o 580 – Travel - Employees
    - o 610 – Supplies
    - o 611 – Supplies – Technology Related
    - o 612 – Computer Software
    - o 615 – Expendable Equipment
    - o 810 – Dues and Fees
    - o 890 – Other Expenditures
- 2230
- 2300
- 2700

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.*