

Office of English Language Acquisition Services

Title III Grants, Accountability & Monitoring

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OVERVIEW

- The purpose of Title III of the *No Child Left Behind Act of 2001* (NCLB) is to ensure that limited English proficient (LEP) students, including immigrant children and youth, develop English proficiency and meet the same academic content and achievement standards required of all children.
- Schools must use these funds to implement language instruction educational programs which carry out activities that use a scientifically based research approach. The district's plan for addressing the needs of LEP students and immigrant children and youth should be developed in consultation with teachers, researchers, administrators, parents, and the community.
- Title III funding comes in two parts, LEP and Immigrant Children and Youth, and is allocated on a formula basis according to the number of LEP and immigrant students in the district.

FUNDING



First Rule for applying for Grants.....



- Each LEA **MUST** have a Common logon and must be a GSA signer in order to access Grants through the “Grants Management Enterprise” system.
- For a Common Logon user name and password: contact the ADE **Support Center at 602-542-7378.**
- To be added to the GSA signer list: please contact the **Grants Management Unit at 602-542-3695** to obtain the paperwork which must be signed by Authorized Representatives.

Federal ELL Grants in OELAS:

◎ Federal ELL Grants

- Emergency Immigrant
- Title III LEP
- Title III Consortium
 - *An LEA that receives a grant under Section 3111(a) may collaborate or form a consortium with one or more LEAs to carry out a program for limited English proficient (LEP) students.*

How to access Fiscal ELL Grants...

◎ Common Logon

- Grants Management
 - Online Applications
 - Create New Application
 - Choose from ELL grants provided:
 - ✓ Title III LEP Program
 - ✓ NCLB Title III Consortium
 - ✓ Emergency Immigrant

Use of Federal Funds – Criteria

Costs must be...

- **reasonable**

- *A cost is reasonable if, in its nature and amount, does not exceed that which would be incurred by a prudent person under the circumstances prevailing at the time the decision was made to incur the cost.*

- **allocable**

- *A cost is allocable to a cost objective if the goods or services involved are chargeable or assignable to the cost objective in accordance with the relative benefits received.*

- **allowable**

- *A cost is allowable if it is necessary and reasonable for proper and efficient performance of the award and allocable to the award.*

(OMB Circular A-87)

Use of Federal Funds – Criteria (cont'd)

Do all of the proposed expenditures meet the following criteria:

- Are they allowable?
- Are they allocable?
- Are they reasonable and necessary to carry out grant functions?
- Should they be included in the 2% limit as administrative costs?
- Do they meet supplement, not supplant requirements?

Use of Federal funds – Required and Authorized:

- **Required LEP/Immigrant grantee activities (Section 3115(c)):**
 - Provide high-quality language instruction programs based on scientific research for teaching LEP children.
 - Provide high-quality professional development that is designed to improve instruction and assessment of LEP children, scientifically based, and of sufficient intensity and duration.
- **Authorized LEP grantee activities (Section 3115(d)):**
 - Upgrading program objectives and effective instructional strategies.
 - Identifying, acquiring, and upgrading curricula and materials.
 - Providing tutorials and intensified instruction.
 - Developing and implementing language instruction programs that are coordinated with other relevant programs and services.
 - Providing community participation programs, family outreach, and family literacy programs.
 - Improving instruction through educational technology, electronic networks for materials, training and communication, and incorporating resources into curricula and programs.

2% Cap on Administrative Costs

- ⦿ Districts have a limit of **2% of the Title III grant award for administration. (section 3115(b))**
- ⦿ **Administration = administrative costs + indirect costs**
 - *Examples of **administrative costs**:*
 - support staff, coordinators, & other personnel that perform administrative functions
- ⦿ **Indirect costs = organization-wide costs 1) incurred for a common or joint purpose benefiting more than one cost objective, and 2) not readily assignable to the cost objectives specifically benefitted**
 - *Example of **indirect costs**: utility costs*

(Source: OMB Circular A-87)

Supplement, not Supplant Requirement - General

Title III funds must be used to supplement the level of the level of Federal, State and local funds that, in the absence of Title III funds, would have been expended for programs for limited English proficient (LEP) students and immigrant children and youth.

(section 3115(g))

Supplement, not Supplant Requirement - General

The First Test of Supplanting: Required by Law

The Department assumes supplanting exists if – ***An LEA uses Title III funds to provide services that the LEA is required to make available under State or local laws, or other Federal laws.***

The Second Test of Supplanting: Prior Year

The Department assumes supplanting exists if – ***An LEA uses Title III funds to provide services that the LEA provided in the prior year with State, local or other Federal funds.***

Immigrant Children and Youth information:

The term immigrant children and youth means individuals who:

- are aged 3 through 21;
- **were NOT born in any State; and**
- **have NOT been attending one or more schools in any one or more states for more than 3 full academic years.**

Immigrant Children and Youth information:

How do I enter an Immigrant Need Code?

- Enter in your LEAs Student Management System
 - Need Group: ED –Economic Disadvantage
 - Need Code: 8 -Immigrant

Or... You may also enter the Immigrant Need code via SAIS Online

- SAIS Online: Add Support Program Participation
- Need Group: ED –Economic Disadvantage
- Need Code: 8 -Immigrant

Funding for Immigrant Children and Youth:

- The Arizona Department of Education prepares and allocates funds to eligible LEAs, i.e., districts and charter schools, who meet the criteria identified in SEC. 3114, of the No Child Left Behind Act of 2001.
- This act provides for awards of subgrants to eligible entities in the State that have experienced a significant increase in the percentage or number of immigrant children and youth. We have defined significant increase as at least 10 or more children and/or a 25% increase in the number of immigrant children and youth.

Use of Federal funds – Authorized:

- **Authorized Immigrant Children and Youth grantee activities (Section 3115(e)):**
 - Family literacy, parent outreach, and training activities designed to assist parents to become active participants in the education of their children.
 - Support for personnel, including teacher aides who are providing services to immigrant children and youth.
 - Provision of tutorials, mentoring, and academic or career counseling.
 - Identification and acquisition of curricular materials, educational software, and technologies to be used in the program.
 - Basic instructional services that are directly attributable to the presence in the LEA of immigrant children.
 - Other instructional services (i.e., introductory programs to the educational system in the United States and civics, government, history, etc).
 - Activities, coordinated with community-based organization or other entities with expertise in working with immigrant, to assist parents.

PRIVATE SCHOOL PARTICIPATION IN TITLE III PROGRAMS

AUTHORITIES

- *No Child Left Behind Act of 2001*, Title IX, Part E, Sections 9501-9506
- Education Department General Administrative Regulations (EDGAR), Part 76, Sections 76.650-76.662

STATUTORY/REGULATORY REQUIREMENTS

- After timely and meaningful consultation with appropriate private school officials, local educational agencies (LEAs) receiving Title III funds must provide educational services to limited English proficient (LEP) children and educational personnel in private schools that are located in the geographic area served by the LEA.
- To ensure timely and meaningful consultation, the LEA must consult with appropriate private school officials during the design and development of the Title III program on issues such as:
 - how the LEP children's needs will be identified;
 - what services will be offered;
 - how, where, and by whom the services will be provided;
 - how the services will be assessed and how the results of the assessment will be used to improve those services;
 - the size and scope of the services to be provided to the private school children and educational personnel;
 - the amount of funds available for those services; and
 - how and when the LEA will make decisions about the delivery of services, including a thorough consideration of the views of the private school officials on the provision of contract services through potential third-party providers.

PRIVATE SCHOOL PARTICIPATION IN TITLE III PROGRAMS – Cont'd

- Title III services provided to children and educational personnel in private schools must be equitable, timely and address their educational needs.
- Funds provided for educational services for private school children and educational personnel must be equal, taking into account the number and educational needs of those children, to the funds provided for participating public school children.
- Title III services provided to private school children and educational personnel must be secular, neutral, and non-ideological.
- LEAs may serve private school LEP children and educational personnel either directly or through contracts with public and private agencies, organizations, and institutions.
- The LEA must retain the control of funds used to provide services and the title to materials and equipment purchased with those funds.
- Services for private school children and educational personnel must be provided by employees of the LEA or through a contract made by the LEA with a third party.
- Providers of services to private school children and educational personnel must be independent of the private school and of any religious organization, and the providers' employment or contract must be under the control and supervision of the LEA.
- Funds used to provide services to private school children and educational personnel must not be commingled with non-Federal funds.

Fiscal Monitoring for up coming school years:

- OELAS will conduct a **fiscal desk monitoring and possible onsite visits of each year.**
 - The fiscal monitoring will consist of:
 - Reviewing prior year expenditure reports outlining the use of Title III funds
 - A random sampling of expenditures that may require more supporting documentation from the LEA
 - A random sampling of physical inventory (capital outlay purchases)
 - Reviewing time and effort logs
 - Comparing completion reports to be vetted against expenditures and supporting documentation submitted

Web links and Resources:

- Office of Management & Budget (OMB) Circular A-87:
http://www.whitehouse.gov/omb/circulars_a087_2004
- EDGAR –(See parts 76 and 80 in particular):
<http://www2.ed.gov/policy/fund/reg/edgarReg/edgar.pdf>
- Monitoring Documents and Information:
<http://www.azed.gov/english-language-learners/monitoring-documents/>
- ALEAT Continuous Improvement Plan Guidance Documents:
<http://www.azed.gov/english-language-learners/title-iii/>
- Title III FAQ's:
<http://www.azed.gov/wp-content/uploads/PDF/TitleIIIFAQs.pdf>

ADE Title III Contact Information:

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