



OFFICE OF ENGLISH LANGUAGE ACQUISITION SERVICES

Supplementing without Supplanting: Title III Funding

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Objectives

- Review the findings from the recent USDOE monitoring of Arizona's Title III program.
- Understand the use of Title III funds and appropriate requests for expenses in the grant application.

Use of Funds: Overview

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)

United States Department of Education Monitoring Visit

May 19-22, 2014

3 LEA on-site monitoring visits

2 LEA phone/desk monitoring

1 day to interview ADE staff

Element 1.2 English Language Proficiency (ELP) Assessment

Finding:

- The ADE has not provided evidence that all of its subgrantees annually assess the English language proficiency of all LEP students in grades K-12.
- The ADE was unable to provide a full explanation of the reasons that these students were not assessed on the AZELLA.

Element 1.2 English Language Proficiency (ELP) Assessment

Further action required:

- The ADE must develop and provide to ED a detailed plan and timeline for ensuring that all students identified as LEP and served by Title III are administered the annual ELP assessment.
- The ADE is advised to further refine its data verification procedures so that the SEA can verify reasons for student non-assessment on the AZELLA and follow up with LEAs to identify any patterns of non-assessment.

Element 1.3 – Annual Measurable Achievement Objectives (AMAOs)

Finding:

- The ADE did not ensure that all Title III subgrantees separately inform parents of the LEA's failure to meet AMAOs not later than 30 days after such failure occurs.
 - Two subgrantees reviewed sent the AMAO parental notification letters for the 2013-2014 school year more than 30 days after being notified by the ADE of their AMAO status.

Element 1.3 – Annual Measurable Achievement Objectives (AMAOs)

Further action required:

- The ADE must develop and implement a plan to ensure that Title III subgrantees that do not meet AMAOs inform parents not later than 30 days after such failure occurs.

Element 3.2 – LEA Allocations, Reallocations and Carryover

- The ADE did not ensure that subgrantees are in compliance with the two-percent administrative cap under Title III.
- In several LEAs reviewed, administrative positions funded under Title III were not included in the two percent cap. As a result, several LEAs reviewed exceeded the two percent administrative cap.

Element 3.2 – LEA Allocations, Reallocations and Carryover

Further action required:

- The ADE must develop and implement a plan to ensure that Title III subgrantees abide by the two percent administrative cap. The SEA must submit this plan to ED, along with evidence of implementation.

Element 3.4 – Supplement, Not Supplant

Finding:

- While ADE does monitor subgrantees and annually review their local plans, the ED team identified numerous incidences of potential supplanting violations during the review, as evidenced by the following:

Element 3.4 – Supplement, Not Supplant

Finding:

- One subgrantee spent Title III funds on SEI Liaisons whose major responsibility was keeping other school personnel updated regarding current mandates under State models for language instruction educational programs.

Element 3.4 – Supplement, Not Supplant

Finding:

- Another subgrantee spent Title III funds on an English Language Learner (ELL) Specialist. It was not evident that this position was different from or supplemental to the other five ELL Specialists paid for with local funds.

Element 3.4 – Supplement, Not Supplant

Finding:

- One subgrantee hired a technology specialist whose position was very general and did not appear to support nor supplement services for ELLs.

Element 3.4 – Supplement, Not Supplant

Finding:

- One subgrantee spent Title III funds on translation and interpretation services including training on ethics for interpreters, translation memory software, and two computers used primarily for the translation of general documents.
- These expenditures supported translation of general information in the LEA, rather than Title III-specific translation activities or supplemental translation above and beyond that provided by the LEA to all students.

Element 3.4 – Supplement, Not Supplant

Further action required:

- The ADE must develop and provide ED with a detailed plan, including a timeline for annually ensuring that Title III subgrantees comply with Title III non-supplanting requirement.
- The SEA's plan should include review of subgrantee plans and budgets; and, in instances where those plans include Title III supplemental staff, the SEA should ensure that these individuals do not provide any services that would have been expended for LEP students in the absence of Title III funding.
- The plan must address how the State will annually ensure that Title III subgrantees comply with the Title III non-supplanting requirement.

Supplementing without Supplanting: Looking at Title III

Use of Funds: Overview

Required LEP grantee activities

- × 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.

(Section 3115(c))

2% Cap on Administrative Costs

× Districts have a limit of **2% of the Title III grant allocation 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

(OMB Circular A-87)

Supplement, not Supplant

Title III funds must be used to supplement 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 students... Section 3115(g)

Supplement, not Supplant

The First Test of Supplanting: Required by Law

Supplanting exists if an LEA uses Title III funds to provide services that the LEA is required to make available under State/local laws or other Federal laws.

The Second Test of Supplanting: Prior Year

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.

Supplement, not Supplant

Title III Grant Applications

Salaries

- × Job title
- × Highly Qualified?
- × Working only with ELLs?
- × FTE or hourly
- × Main responsibilities
- × If Paraprofessional: Highly Qualified and working under direct supervision of a Highly Qualified teacher?

Example

Pay 10 HQ teachers to provide supplemental reading and math interventions after school to support ELL students (3 days a week - \$25 an hour = \$20,000)

Title III Grant Applications

Benefits

- × Job title
- × Amount and/or Percentage
- × Breakdown

Example

Benefits for 10 HQ ELL tutors @ \$2,850. Includes FICA, ASRS, Workers Comp.

Title III Grant Applications

Professional Development

- × Instructional focus
- × Date and/or duration of trainings
- × Teachers of ELLs?
- × Training provider (*e.g., consultant, coach, ADE*)

Example

Staff development consultant to train 30 SEI teachers on ELD methodologies for 7 days, \$4,000 per day, \$28,000 total.

3 HQ SEI teachers to attend OELAS Conference, \$395 each, \$1,185 total.

Title III Grant Applications

Professional Development for **administrators** must be coded under 2300 and counts towards the 2% cap on administrative expenses.

Title III Grant Applications

Travel

- × Training or conference
- × Number of attendees
- × Teachers of ELLs?
- × Number of days
- × Location

Example

Hotel and transportation expenses for 2 ELL teachers to attend 3 day ELL strategies conference in Tucson, \$1,800.

Title III Grant Applications

Capital Outlay

- × Item(s)
- × Description of how item(s) will be used to supplement instruction
- × Used only with ELLs?

Example

Purchase 10 iPads for the sole and exclusive use of Title III students to increase language acquisition through the use of vocabulary and grammar applications. Applications are supplemental to core instruction and support the delivery of the ELP standards.

Continuous Improvement Plans

- ✘ Continuous Improvement Plans are meant to be a comprehensive plan of how your LEA will improve educational outcomes in the upcoming school year.
- ✘ This includes how you will use Title III funds to improve outcomes for English Language Learners.
- ✘ All major elements of your grant application (salaries, professional development, capital outlay) **must** be described in your Continuous Improvement Plan.



LEAs

Current LEA:
Sample LEA - Technical Assistance

[Setup & Maintenance](#)

[LEA Overview](#)

[Monitoring](#)

[Plan](#)

[LEA File Cabinet](#)

[Plan Tags](#)

[Home](#) > [Sample LEA - Technical Assistance](#)



LEA OVERVIEW

3

Sample LEA - Technical Assistance

Select School Year:

2014 - 2015 School Year

[Update](#)

[Instruments \(13\)](#)



[Continuous Improvement Plan Goals \(6\)](#)

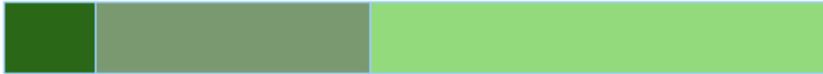


[Schools \(7\)](#)

[Go To Plan Overview](#)

Action Steps: 9

Status:



● Completed (1) ● Not Begun (5)

● In Progress (3) ● Suspended (0)



Page size: 25

1 to 6 of 6 items

Title	Strategies/ Action Steps	Last Updated
Standard 1 - Continuous Improvement	3/4	Tee Lambert 07/12/2013
Standard 2 - LEA Leadership	4/1	Tee Lambert 07/12/2013
Standard 3 - Curriculum and Instructional Systems	1/1	Tee Lambert 07/12/2013
Standard 4 - Supplemental Supports & Interventions	2/3	Tee Lambert 07/12/2013
Standard 5 - Data, Assessment and Evaluation	0/0	Tee Lambert 07/12/2013
Standard 6 - Stakeholder Relations	1/0	Tee Lambert 07/12/2013



Page size: 25

1 to 6 of 6 items

LEA INFORMATION

LEA Type	Title I
Title III Funds:	Yes

ONSITES

[Schedule Onsite](#)



LEAs

Current LEA: **Sample LEA - Technical Assistance**

[Setup & Maintenance](#)

LEA Overview

Monitoring

Plan

LEA File Cabinet

Plan Tags

[Home](#) > [Sample LEA - Technical Assistance](#) > [Plan](#)



CONTINUOUS IMPROVEMENT PLAN 📄 0 🔍 + 💬 2 Sample LEA - Technical Assistance - 2014 - 2015 School Year

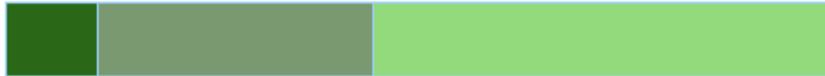
Select School Year:

2014 - 2015 School Year

Last Updated : Tee-LEA Lambert 11/21/2013 9:45 AM

Action Steps: 9

Status:



- Completed (1)
- Not Begun (5)
- In Progress (3)
- Suspended (0)

TOTAL PLAN FUNDS:
\$0.00

Budgeted :	\$0.00
Actual :	\$0.00

Plan | Timeline | Budget | Manage Goals | Reports

▼ FILTERS

Status: Funding Source: SEA Tag: LEA Tag: Assignment:

Update: Goal: Type: Active Retired

Requires PD: Budgeted : \$0.00
Actual : \$0.00

Add Strategy



GOAL: <u>Standard 4 - Supplemental Suppor...</u>	STRATEGIES: 0 of 2 Complete	ACTION STEPS: 1 of 3 Complete ▲ 2 Overdue	Budgeted: \$0.00
	TASKS: 0 of 7 Complete		Actual: \$0.00

Timely and additional instructional and/or behavioral services focused on individual student needs and that are in addition to core instruction.

Indicators of an effective LEA:

SSIS 1 - Supports the framework that provides appropriate interventions and extended learning services for all students.

SSIS 2 - Provides timely and accurate data to determine interventions at the school and individual level.

SSIS 3 - Provides sufficient resources required to support and maintain interventions.

SSIS 4 - Ensures that personnel providing interventions are highly qualified and effective.

SSIS 5 - Supports the coordination of supplemental and intervention services.

Hide Detail

Add Action Step



STRATEGY: <u>Interventions for Struggling Stu...</u>	ACTION STEPS: 1 of 1 Complete	TASKS: 0 of 2 Complete	Budgeted: \$0.00
			Actual: \$0.00

Develop strategies and action steps that address the LEA intervention programs for supporting at-risk students.

Hide Detail

Add Task



ACTION: <u>Program development</u>	Responsible:	Tasks: 0 of 2 Complete	Budgeted: \$0.00
STATUS: <u>Completed 11/14/2012</u> Update Progress	Due Date: 9/30/2011		Actual: \$0.00

Conduct data analysis to determine the targeted areas of the intervention program.

Hide Detail