



# Title III LEP and Consortium Applications

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ARIZONA DEPARTMENT OF  
**EDUCATION**

# Who is here today?



# Session Objectives

- Review Title III funding application requirements
- Learn about the process for forming a Title III Consortium
- Explore the roles and responsibilities for consortium members and the lead fiscal agent
- Understand Supplement, Not Supplant and how it pertains to Title III

# Acronyms

**ADE =**

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**EEOA =**

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**EL =**

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**ESEA =**

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**IGA =**

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**LEA =**

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**LEP =**

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**MOU =**

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**SNS =**

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# **Title III Requirements**

# Title III Federal Requirements:

1. Provide effective language instruction programs for English learners  
[Title III, Section 3115 (c) (1)]
2. Provide effective **professional development** to teachers and school leaders in educational strategies to best meet the academic and language needs of ELs [Title III, Section 3115 (c) (2)]
3. Provide and implement **parent, family, and community engagement** activities that supplement and enhance the EL program  
[Title III, Section 3115 (c) (3)]
4. Costs must be reasonable, allowable and allocable  
[Uniform Grant Guidance UGG]

# Program Review - Foundation

All grant expenses **must be** for the purpose of increasing English **language proficiency** and **academic achievement** of English learners by providing effective language instruction educational programs that meet their unique needs.



# Supplement, not Supplant

To determine allowability of expenditures, activities MUST:

1. **only** be provided for ELs and are **in addition to** what is being provided for non-ELs
2. not be funded with other Federal, State or local funds in the current or prior year
3. be **supplemental** to the LEA's civil rights obligations to ELs and their parents under Title VI and the Equal Educational Opportunities Act (EEOA)
4. not be required under other Federal, State or local laws



# Types of Title III Grants

## LEP

- Stand alone LEA Grant
- Allocation is \$10,000 or more

## Consortium

- 2 or more LEAs
- Total must equal AT LEAST \$10,000
- Identify Fiscal Agent
- IGA must be in place

# Types of Title III Grants

**LEP**

**Left hand up!**



**Consortium**

**Right hand up!**



**Unsure**

**Both hands up!**



# Title III LEP

# Elementary and Secondary Education Act (ESEA)

- ❖ A Title III subgrant be \$10,000 OR MORE in the initial allocation (without carryover)  
(ESEA Section 3114(b))
- ❖ An LEA may receive and allocate the Title III funds as a single LEA under the ESEA.

# FY25 Timeline

September 30, 2025	December 30, 2025
FY25 revisions must be director approved	FY25 Completion Reports must be approved by Grants Management

# FY26 Timeline

April 1, 2025	May 1, 2025	July 1, 2025
FY26 grant <b>application opens</b> in GME	suggested date to <b>submit</b> all funding applications	target date for FY26 grant approvals

# Title III

# Consortium

# Elementary and Secondary Education Act (ESEA)

- ❖ A Title III subgrant be at least \$10,000 (ESEA Section 3114(b) )
- ❖ An LEA may join with other LEAs to form a consortium of LEAs to receive Title III funds under the ESEA.
- ❖ One of the LEAs **must** serve as the fiscal agent for the consortium, and is legally responsible to the Department for the grant (34 CFR § 76.303)



# Most Common Consortium Types

- ❖ The LEA fiscal agent distributes a portion of the consortium's allocation to each member LEA based on the number of ELs in each LEA.
- ❖ The LEA fiscal agent provides consortium-wide services.



# Documents and Responsibilities

# Memorandum of Understanding (MOU)

**LEAD LEA/FISCAL AGENT FUNDING FORMS AND**  
**MEMORANDUM OF UNDERSTANDING**  
**CONSORTIA FUNDING FY25**

The superintendents or designees of each of the local educational agencies (LEA) listed on this document agree to form and participate in a Title III consortium of LEAs for the purpose of providing supplemental programs and services to eligible English learners. By affixing their signatures to these forms, the superintendents or designees certify that: (1) they will abide by all statutory requirements of Title III, Part A and (2) they will adhere to the legal assurances contained in the Title III Program Assurances.

**LEAD LEA / FISCAL AGENT OF CONSORTIUM**

Lead Fiscal Agent: \_\_\_\_\_ LEA CTDS: \_\_\_\_\_



*Print name of administrator/contact person for the Lead LEA/Fiscal Agent:*

Administrator/Contact:

Title:

Mailing Address:

City:

State:

ZIP:

Telephone: (    )

Fax: (    )

E-mail:

# Fiscal Agent Responsibilities:

- ✓ ensure that consortium members fulfill their fiscal and programmatic responsibilities as subgrantees under Title III,
- ✓ maintain separate financial records for its members,
- ✓ communicate to all members any information from the Arizona Department of Education (ADE) relevant to the fiscal application and programmatic requirements of the funds,

# Fiscal Agent Responsibilities (continued):

- ✓ ensure expenditures requested for reimbursement align with the approved grant,
- ✓ submit timely and regular requests for reimbursement and disburse the funds throughout the project period,
- ✓ submit the Title III Consortium Completion Report, which includes final expenditures and the required documentation

# Member Documents

LEA NAME \_\_\_\_\_ CTDS# \_\_\_\_\_

**PARTICIPATING LEA MEMBER –**  
**CERTIFICATION AND ASSURANCES**  
**CONSORTIA FUNDING FY25**

The superintendent or designee of the local educational agency (LEA) listed on this certification document agrees to participate in a Title III consortium of LEAs for the purpose of providing supplemental programs and services to eligible English learners. By affixing their signature to the certification forms, the superintendent or designee certifies that: (1) they will abide by all statutory requirements of Title III, Part A and (2) they will adhere to the legal assurances contained in the Title III Program Assurances.

**PARTICIPATING LEA MEMBER - CERTIFICATION**

LEA Member: \_\_\_\_\_ LEA CTDS: \_\_\_\_\_

**Contact Information:**

Administrator/Authorized LEA Representative: \_\_\_\_\_

Title: \_\_\_\_\_

# Member Documents (continued)

Title III LEA Plan Requirements

\*LEA Name

\*CTDS

\*Entity ID

1. \*Describe the effective programs and activities, including language instruction educational programs, proposed to be developed, implemented, and administered under the subgrant that will help English learners increase their English language proficiency and meet the challenging State academic standards.

# Member Responsibilities

- ❖ Submit a budget to the fiscal agent which does not exceed its current year allocation plus carryover (unless the consortium is pooling funds)
- ❖ Follow timeline as set by the lead agent, consortium or ADE
- ❖ **Communication is key!**



# Budget Sample in Excel

TITLE III CONSORTIUM BUDGET REQUESTS				Federal Requirement: 2% limit on administrative costs	
LEA Name				Admin max allowed	<b>Federal requirement:</b> Title III requirements limit spending for administrative costs to 2% of an LEA's allocation (excluding carryover). Administrative costs are those expenses coded in <b>function codes 2300, 2400, 2500 and 2900</b> . Once the allocation amount is added to cells C5 and C6 of this template, the 2%cap will automatically be calculated to show the maximum amount allowable to be budgeted for admin costs.
Preliminary Allocation		\$0.00		\$0.00	
Final Allocation		\$0.00		\$0.00	
Incoming Carryover		\$0.00		n/a	
Total amount available to budget					
<a href="https://cms.azed.gov/home/GetDocumentFile?id=5acd37053217e1183c539f78">https://cms.azed.gov/home/GetDocumentFile?id=5acd37053217e1183c539f78</a>					
Budget Line		Budget Amount	GME Narrative	IAP Description	
Object Code	Function Code				
All grant requests must follow USFR Chart of Account coding requirements: <a href="https://www.azauditor.gov/usfr">https://www.azauditor.gov/usfr</a>					
Columns A - D are entered into GME by the Consortium Lead Agent				Column E is entered into the IAP by the LEA Representative	
<b>SAMPLE:</b> 6100	<b>SAMPLE:</b> 1000	<b>SAMPLE:</b> \$16,150	<b>SAMPLE:</b> partial salaries (1 at .3 FTE, 1 at .5 FTE) for 2 EL Intervention Instructional Support Specialists	<b>SAMPLE:</b> The EL Intervention Instructional Support Specialists are classified staff who will assist the HQ ELD teachers directly with small group instruction in the SEI classroom. They will provide push-in services during regular school hours. Instruction by these EL Specialists is provided under the direct supervision of HQ ELD teachers and will target, intervene and remediate identified learning gaps for qualifying ELs. EL students also receive other intervention services provided by the LEA but the services provided by the EL Specialists are highly focused additional support to reinforce language skills and boost language acquisition.	

# FY26 Timeline

Early January 2025	Late January 2025	Early February 2025	Late February 2025
survey sent out to <b>existing</b> consortia lead fiscal agents	deadline to complete Title III consortium survey ( <b>existing consortia</b> )	meeting for interested LEAs <b>not yet in a Consortium</b>	inform ADE of <b>new</b> TIII Consortia



April 1, 2025	May 1, 2025	July 1, 2025
FY26 grant <b>application opens</b> in GME	suggested date to <b>submit</b> all funding applications	target date for FY26 grant approvals

# Self-Reflection/Turn & Talk

- Do we have enough ELs to qualify for Title III funds for an LEP application?
- Do we explore joining a Title III Consortium to access Title III funds?
  - I need to ask more questions at the LEA level.
- My next task in determining Title III funds or the process for my LEA is to...



# Regardless of Application Format

# Programmatic Questions



# Title III LEA Plan Requirements

## LEP

	Assurances
	<a href="#">Title III Assurances</a>
	Title III LEP
	<a href="#">Budget</a>
	<a href="#">Budget Overview</a>
	<a href="#">Budget Overview Plus/Minus</a>
	<a href="#">Capital Outlay Worksheet</a>
	<a href="#">Title III LEA Plan Requirements</a>
	<a href="#">Related Documents</a>
	Substantially Approved Dates
	<a href="#">Substantially Approved Dates</a>
	<a href="#">Substantial Approval Guidance</a>
	Title III LEP Checklist
	<a href="#">Title III LEP Checklist</a>
	All

## Consortium

### Related Documents

District - FY 2025 - **Medium Risk** - Title III Consortium - Rev 0 - Title III Consortium

Go To

ALL INFORMATION SUBMITTED TO ADE IS PUBLIC INFORMATION. Organizations uploading documents to GME must ensure that the information contained in the document does violation. Submission of such documents will result in delay of approval or other action in GME until the document is removed.

Required Documents		
Type	Document Template	Document/Link
Consortia - Lead Agent Funding Forms [Upload at least 1 document(s)]	<a href="#">Consortia - Lead Agent Funding Forms</a>	
Consortia - Participating LEA Member - Certification and Assurances [Upload at least 1 document(s)]	<a href="#">Consortia - Participating LEA Member - Certification and Assurances</a>	
Title III LEA Plan Requirements_Consortium Members [Upload at least 1 document(s)]	<a href="#">Title III LEA Plan Requirements_Consortium Members</a>	

Optional Documents		
Type	Document Template	Document/Link
Affirmation of Consultation with Tribal Representatives (EMAIL TO Tribal.Consultation@azed.gov - DO NOT UPLOAD)	<a href="#">Affirmation of Consultation with Tribal Representatives</a>	
Eligible Private School Service	N/A	
Title III Consortium - Budget Requests	<a href="#">Title III Consortium Budget Requests Template</a>	
Title III Funded Equipment (Object Code 6600) for Charter LEAs	<a href="#">Title III Funded Equipment for Charter LEAs</a>	
Other	N/A	

# Questions

1. Describe the effective programs and activities, including language instruction educational programs, proposed to be developed, implemented, and administered under the subgrant that will help English learners increase their English language proficiency and meet the challenging State academic standards.

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2. Describe the effective professional development for classroom teachers, principals and other school leaders, administrators, in support of the education of English learners.



# Questions

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2. Describe the effective professional development for classroom teachers, principals and other school leaders, administrators, in support of the education of English learners.
3. Describe how the eligible entity will ensure that elementary schools and secondary schools receiving funds under this subpart assist English learners in:
  - a. achieving English proficiency based on the State's English language proficiency assessment under section 1111(b)(2)(G),
  - b. consistent with the State's long-term goals, as described in section 1111(c)(4)(A)(ii); and
  - c. meeting the challenging State academic standards.

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  - b. consistent with the State's long-term goals, as described in section 1111(c)(4)(A)(ii); and
  - c. meeting the challenging State academic standards.
4. Describe how the eligible entity will promote parent, family, and community engagement in the education of English learners.

# Budget Narratives



# ADE Budget Narrative Guidance

<https://gme.azed.gov/DocumentLibrary/ViewDocument.aspx?DocumentKey=2350268&inline=true>

## Grants Management Resource Library

1

### Grants Management Resource Library Search

Choose Keyword:

Or Enter Text:

Below is the Grants Management Resource Library. Expand the nodes to view the folder

### Grants Management Resource Library [Expand All] [Collapse All]

#### + CARES Act Funding


#### + Fund Alerts


#### - GME User Resources/Training


##### + Completion Reports


##### + Fiscal Monitoring


##### - Funding Applications


 [Substantial Approval FAQs](#)


 [ADE Budget Narrative Guidance](#)

 [Holds Infographic](#)

 [Capital Outlay Worksheet \(Fast Facts\)](#)

 [Entitlement vs. Competitive Funding Applications \(Fast Facts\)](#)

 [Funding Application User Roles \(Infographic\)](#)

 [Cost Allocation Plan Internal Service Fund Flyer](#)

# Supplement, not Supplant

Determining SNS is situation specific based on all programs and services provided by an LEA

- Supplement = to add to; to go above and beyond
- Supplant = to replace

## Why does SNS matter?

- ❖ All students have the right to receive an education that is equal to that of their peers, regardless of language proficiency.

# Determining Supplement, not Supplant

- ✓ supplemental to the core program
- ✓ not purchased for non-qualifying students or by other funding sources
- ✓ only for ELs, teachers of ELs, or families of ELs



# Supplemental or Supplanting Title III Funds

# Determining Supplement, not Supplant

Key questions to consider when determining whether Title III funds can be used without violating the supplement not supplant requirement.

1. Is the instructional program, service, or supply provided to all students?
2. Is the LEA required to provide the service by Federal, State, and local laws or regulations?
3. Was the program or service previously provided/funded with federal, state, or local funds?



# Check for Understanding:

**Approvable**

**Not Approvable**

**It depends; We  
need more  
information.**

## Check for Understanding:

- Can Title III funds pay for a teacher for Targeted and/or Integrated Instruction?

**No.** Title III funds cannot fund items that are required of the LEA.

## Check for Understanding:

- Can Title III funds pay for compensatory instruction?

**It depends.** Is this service also available to non-ELs through other funding sources?

## Check for Understanding:

- Can Title III funds be used to pay for interpreting services for students and their parents at parent-teacher conferences?

**No** – LEAs are required to provide information in a language that is understood by the parents

## Check for Understanding:

- Can Title III funds be used to pay for student i-pads?

**It depends** – Are i-pads currently funded for other (non-EL) students or have they been purchased in the past year using other funding sources?

## Check for Understanding:

- **Can Title III funds be used to pay for interpreting during a family literacy night held exclusively for families of ELs?**

**Yes – If the event is supplemental (above and beyond what is offered to all families), then interpreting services would be allowable**

# Revisiting the Session Objectives

- Review Title III funding application requirements
- Learn about the process for forming a Title III Consortium
- Explore the roles and responsibilities for consortium members and the lead fiscal agent
- Understand Supplement, Not Supplant and how it pertains to Title III

# Questions





# Thank you!

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ESEA Field Day Questions

