



COLORADO
Department of Education

Title III, Part A - Language Instruction for English Learners and Immigrant Students

Introductions

Our Team

Structure of webinar

Recording for future viewing

- Will go through slides and respond to questions at the end
- Please feel free to type in questions into chat box
- Or at the end, we will open up microphones

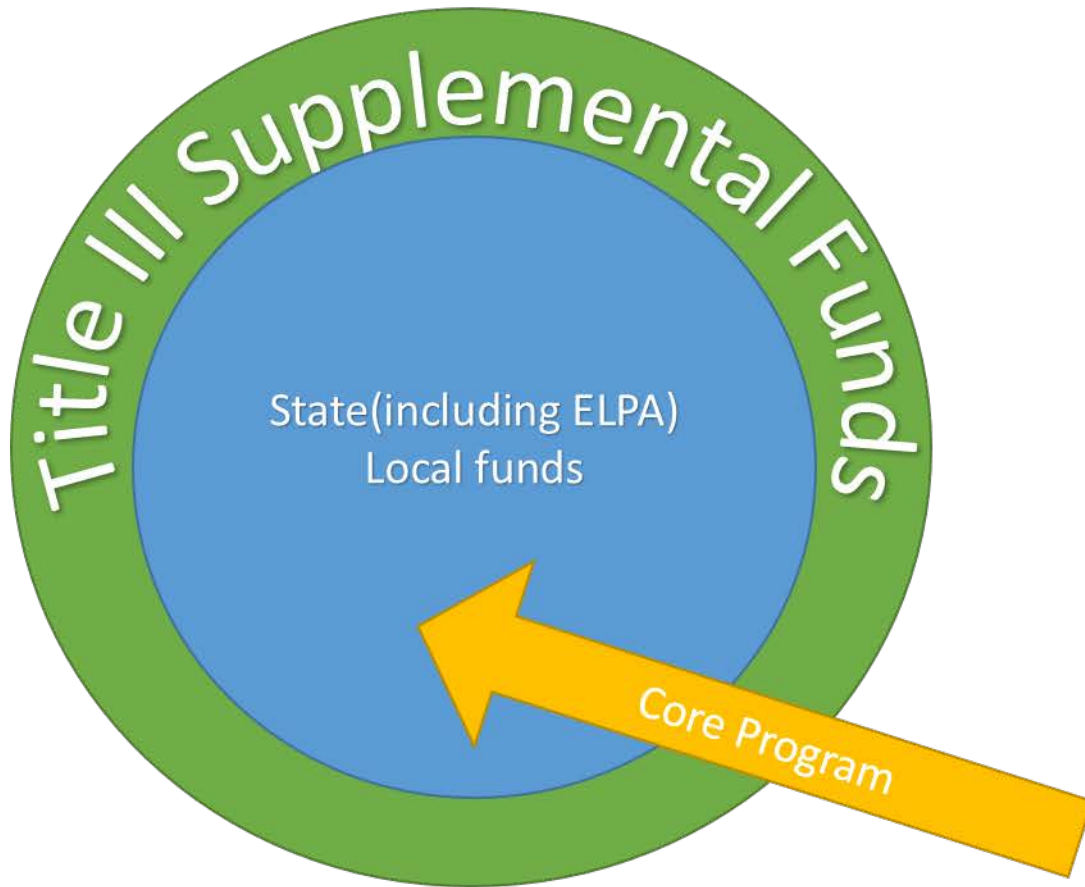


Purpose:

This webinar is designed to support LEAs in the planning and implementation of Title III, Part A and Title III, Immigrant Set-Aside services for staff and students.

Title III Program Components

Title III Programming



ELD Core Programming

According to USDE, a core program is a set of instructional services and curricula designed to help ELs acquire English proficiency and meet high academic standards. The core program is composed of characteristics, principles, and practices that have been developed based on theory and research and serves as a blueprint for which the schools within the district (LEA) follow.

Title III, Part A Including Immigrant Set-Aside: Allocations

- Colorado's Title III allocation is based on the number of English Learners reported through the American Community Survey and U.S. Census data. CDE reserves 5% of its Title III allocation for the Immigrant Set-Aside grant.
- [Additional Information: US Census](#)
- Annual LEA (District or Consortia) allocations are based on the number of English learners reported through the annual Student October Count. The previous Student October count informs the subsequent school year Title III allocation.
- Title III Immigrant Set-Aside: CDE determines local allocations based on the number and average number of immigrant students reported through the annual Student October Count in **three** school years prior to the current school year.
- [Allocations may be accessed here](#)

Purposes

The purposes of Title III, Part A are to:

- Ensure ELs and immigrant children and youth attain English proficiency and develop high levels of academic achievement;
- Assist all ELs in meeting Colorado Academic Standards (CAS)
- Establish, implement, and sustain effective English language development (ELD) programs designed to assist in teaching ELs

Purposes, cont.

The purposes of Title III, Part A are:

- Develop and enhance the capacity of teachers principals and other school and district leaders to provide effective instructional programs for ELs, and
- To promote parental, family, and community participation in ELD programs.

Requirements

Required activities include:

1. ELD programs that have successfully demonstrated increasing English language proficiency and academic achievement.
2. Providing effective professional development to all staff that relates directly to the instruction of ELs that support their linguistic, academic, and social-emotional challenges and opportunities of ELs.
3. Providing and implementing other effective activities and strategies that enhance or supplement ELD programs for ELs. These activities and strategies must include parent, family, and community engagement activities, but may also include strategies that coordinate and align related programs.

Use of Funds

Allowable Activities Include:

- Upgrading ELD program objectives and effective instructional activities.
- Improving ELD programs for ELs by identifying, acquiring, and upgrading curricula, instructional materials, educational software and technology, and assessment procedures that improve content and language acquisition.
- Providing community participation programs, family literacy services, and parent outreach and training activities to EL students and their families.
- Providing tutoring and intensified instruction for EL students.
- Offering early college high school or dual/concurrent enrollment programs or courses designed to help ELs achieve in postsecondary education.
- Developing and implementing effective preschool, elementary or secondary school ELD programs that are coordinated with other relevant programs and services.
- Improving the instruction for EL students, including EL students with a disability or identified as gifted in a specific area.

Unallowable Expenses

- W-APT, WIDA Screener, or ACCESS 2.0
 - ELPA requires LEAs to identify, provide services, and annually evaluate ELs. LEAs cannot use Title III to purchase these materials, train teachers, or provide FTE/subs/release time to administer assessments.
- Core Resources
 - Curricular resources for ELD or content blocks
 - ELD Resources - EL Achieve, Pearson Language Central, National Geographic Edge, Reach, Inside the USA
 - [READ Act approved programming](#)
 - FTE for ELD or content areas

Title III, Part A Supplement, Not Supplant

Title III funds must only be used to provide additional services, staff, programs, or materials that are not provided with State or local resources absent federal funds; federal funds cannot pay for resources that would otherwise be purchased with State and/or local funds.

Supplanting occurs when the LEA provides services that:

- are required under other federal, state, or local laws, or
- were provided with non-federal funds in prior years

If there is ever a question about the use of Title III Part A funds, reach out to your [regional contact](#) or state Title III Coordinator for further support.

Fiscal Supplement, Not Supplant

Title III funds cannot be used to pay for an activity (supplies, curricular resources, FTE, stipends, etc.) that was previously paid for with another funding source.

Considerations:

How was it funded in the past? Other federal or state and local funds?

Programmatic Supplement, Not Supplant

Title III funds cannot be used to pay for an activity (supplies, curricular resources, FTE, stipends, etc.) that is required for local ELD programming per Civil Rights, DoJ, and State laws or required by local policies, Consent Decrees, or agreements.

Considerations:

- How is this activity supplemental to the core ELD program?
- How is the program specifically designed for ELs?
- Does ELPA require?
- READ Act?

Supplement, Not Supplant Examples

Example 1 - An ELD teacher is funded for 0.5 FTE with ELPA funds. Your district requests to use Title III to increase FTE for the teacher to provide additional ELD support, professional development, or family outreach. Can the district use Title III funding for the increased FTE?

Example 2: An ELD teacher in your district was funded with ELPA, but ELPA funding decreased because of lower EL student counts. Can the district use Title III funding to make up the difference?

Additional Fiscal Considerations

Allocation Minimum/Consortia Requirement

- An LEA or consortium allocation must meet or exceed \$10,000 in order to apply for a Title III grant.
- Title III Immigrant Set-Aside does not have a minimum allocation in order to accept the funds.

Administration Costs

- An LEA may use no more than 2 percent of its LEA funds for direct administrative costs. However, as a result of the ESSA changes, any funds the LEA reserves for administrative costs may be used only for direct administrative costs. This provides an LEA with flexibility to apply its restricted indirect cost rate to the portion of its subgrant that it does not reserve for administrative costs.

Additional Fiscal Considerations Cont.

Carryover Limits

- There is not a statutory limitation on carryover under Title III, Part A; however, funds should be drawn down in a timely manner.

27 month expiration

- Federal grants expire after 27 months. There is no recourse for recovering funds after expiration. Grant balances may be accessed by viewing the Distribution Reports.
- [Distribution Reports may be found here](#)

Reasonable and Necessary

- Funded activities must be reasonable and necessary.

Non-public Schools

- Eligible students attending a non-public school may receive equitable services under Title III, Part A.
- LEAs must ensure that timely and meaningful consultation occurs with appropriate private school officials with the goal of reaching agreement on how to provide equitable and effective programs for eligible students.
 - The results of consultation must be submitted annually to the non-public school ombudsman by May 31.
 - [The consultation form and additional guidance may be accessed here](#)

Title III Immigrant Set-Aside

Title III, Immigrant Set-Aside Purpose

The Title III Immigrant Set-Aside grant is designed to support school districts that have experienced a significant increase in immigrant students over the past two years. This program provides enhanced instructional and supplemental support opportunities for immigrant students and their families.

Title III, Immigrant Set-Aside

Immigrant Children and Youth

Immigrant children and youth, as defined by Title III for the use of Title III - Immigrant Set-Aside funds and reporting requirements, include children and youth that:

- Are between the ages of three years old and twenty-one years old;
- Were not born in the United States or any U.S. Territory; and,
- Have not attended school in the United States for more than three full academic years.*
 - To determine the number of “full academic years” a student has been enrolled in U.S. schools, count only the cumulative amount of time a child has been enrolled in U.S. schools. If a student leaves the U.S. and returns, the time out of the country does not count toward the three years.

Title III, Immigrant Set-Aside Continued

Examples of Immigrant Children and Youth

Example 1: Puerto Rican students may not be counted as immigrant students. However, foreign exchange students and children of U.S. military personnel born on U.S. bases abroad may be counted as immigrant students.

Example 2: Student moved to the U.S. this year from Canada and is a native speaker of English. This student may be classified as an immigrant student.

Example 3: Student moved to the U.S. four years ago and attended school in Texas, returned to Mexico for two years and attended school there, then enrolled in your school in Colorado. This student may be classified as an immigrant student.

Requirements: Title III Immigrant Set-Aside

LEAs that receive Title III Immigrant Set-Aside funds are required to submit a narrative describing how they propose to serve immigrant children and youth, and their families, for the school year in which they receive an allocation. The narrative must align to the budget that is also submitted annually.

Use of Funds: Title III Immigrant Set Aside

Allowable Activities Focused on Immigrant Children and Youth

- Family literacy, parent outreach, and training activities to help parents to participate actively in their children's education.
- Support for personnel, including teacher aides, specifically trained to serve immigrant children.
- Tutoring, mentoring, and academic or career counseling.
- Identification and acquisition of supplemental curricular materials, and educational software and technologies.
- Basic instruction services directly attributable to their enrollment; classroom supplies, costs of transportation, etc.
- Other instruction services to assist immigrant students: civics education, introduction to educational system, etc.
- Activities coordinated with community-based organizations, institutes of higher education, and private sector entities to assist parents by offering comprehensive services.

Title III, Part A: Consolidated Application Considerations

What helps to expedite final approval?

- Thorough responses to all pieces of each narrative question
 - Narrative responses should include a description of every proposed activity
 - Narrative responses match budgeting items
- Meets fiscal *and* programmatic 'Supplement, Not Supplant' guidelines
- Meets 2% admin cap
 - Under ESSA, LEAs can take 2% direct admin and approved Indirect cost rates

Consolidated Application: Considerations

In developing a response to questions in the Consolidated Application, the LEA must include the following:

- Activities must specifically address the linguistic and academic needs of EL students and/or their families.
- Activities must specifically address how each activity is supplemental to the core programming for ELs.
- Activities must specifically address how each activity will be used to expand, enhance or modify existing EL programs.
- Activities funding purchased services or curricular resources must specifically address the parties involved, length of the relationship, and the purpose of the contract.

Title III, Part A Narrative Responses

Narrative Question 1: Evidence of parent and family engagement activities specific to families of ELs*

Narrative Question 2: Each activity described in the budget (aside from family engagement or PD) - all of the other activities/programs for which your district/LEA is using Title III funds for **Updated for 2019/2020**

Narrative Question 3: Professional development - sufficient duration and intensity to provide appropriate support for ELD teachers and any teacher, administrator, or staff member working with ELs*

* Family engagement and professional development may be provided with Title III, other federal, or state and local funds. No matter how it is funded, LEAs must describe the activities in these narrative questions.

Consolidated Application: Considerations Cont.

LEAs should also consider the following in developing a response:

- How the district is meeting ELD core programming requirements, set forth under Title VI of the Civil Rights Act of 1964 enforced by the Office for Civil Rights (OCR) and the Equal Educational Opportunities Act of 1974 enforced by the Department of Justice (DOJ).
- How stakeholders were engaged in the Consolidated Application process.
- Supports that address the linguistic, social-emotional, and academic challenges and opportunities of English learners.
- LEAs under OCR/DOJ agreements or consent decrees must ensure that Title III funds are not being used to fund activities within the consent decree or agreement.

- Translation/Interpretation Services
 - Translation/interpretation can only be used for activities non-essential to the students' education or personal well-being. Anything that needs to be communicated regarding the student's academic successes or challenges or the health and safety of the student needs to be translated or interpreted with general funds
 - Examples of essential communication include: parent conferences, report cards, parent requests for information, IEP meetings/plans, communications after an incident at school, PTA meetings, etc.

Consortium Considerations

- Each member of consortium/BOCES needs to provide a response to each question on their own or the consortium must accept responsibility for specific requirements on behalf of all members or provide a response that is applicable to all members
 - Example 1 - A BOCES may provide all of the PD for all member districts so the response to Narrative Question 3 may just be what supports the BOCES provides
 - Example 2 - A BOCES/consortium may summarize activities provided by a few LEAs.
 - District A, District B, and District C provide adult education classes in Spanish for families of ELs.

Title III Scenarios

Scenarios Part 1

#1 Your district would like to use Title III funds to pay for a literacy teacher/interventionist at XYZ school who will specifically teach a literacy block to only EL students. Is this allowable?

#2 Your district would like to pay for EL students to attend summer school. Is this allowable?

#3 One of your schools used Toyota Family grant for an EL family liaison for three years. With the funding ending, as well as the demonstrated success and continued need for the position, you would like to use Title III funds to pay for the salary and continue the position. Will this be approved?

Scenarios Part 2

#4 Your district would like to purchase services to translate enrollment documents, report cards, and general school documents. Is this allowable?

#5 Your district would like to pay for transportation for EL services to a school for students whose home school does not provide ELD. Is this allowable?

#6 Your district would like to fund a 1.0 FTE for an EL instructional coach who will provide specific EL focused PD to content teachers, as well as coaching, observing, and providing feedback to instructional staff. Is this allowable?

Scenarios Part 3

#7 Your district would like to pay for field trip scholarships for EL students. Is this allowable?

#8 My district would like to pay for all EL teachers in the district to attend EL Achieve training. Is this allowable?

#9 My district would like to offer incentives in monetary form for all educators that complete their 45 hour EL PD requirements. Would this work under Title III?

#10 My district would like to offer a 45 hour EL PD.
Can we do this?

Scenarios Part 4

#11 One of our elementary schools has a high number of dually identified (EL and SPED) students. They would like to pay for 1.0 FTE SPED teacher to work with EL student using Title III funds.

#12 Our district would like to pay for stipends for teachers to become certified in WIDA screener using Title III funds.

Supports & Resources:

[For more information on Title I USDE: Non-Regulatory Guidance- English Learners and Title III Program](#)

[For more information on Title I USDE: ESSA Webinar Audio Recording on Non-Regulatory Guidance](#)

[For more information on Title I USDE: Title III Guidance - English Learners](#)

[For more information on English Learner Professional Development Requirements for educators](#)

Resources and Contacts

For more information on Title III

- Contact: Morgan Cox, Director: cox_m@cde.state.co.us
- Contact: Robert Thompson at Thompson_R@cde.state.co.us

[For more information on CLDE](#)

[For more information on Title III Resources](#)

Questions?
Comments?

