


TITLE III
Requirements and Responsibilities

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Purpose of Title III

1. Ensure ELLs and immigrant students will:

- Attain English proficiency.
- Develop high levels of academic attainment in core academic subjects.
- Meet the same challenging state academic standards as all children are expected to meet.
- Enter an all-English instruction setting.

2. Promote parent and community participation in bilingual/ESL education programs for LEP children.

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Eligibility

To be eligible for Title III funds, LEAs are required to:

- Complete the PIMS data collection on or before the established deadline.
- Complete the LEP SYSTEM data collection sections that have not been replaced by PIMS.
- Order, administer, assess ELLs with the required annual state assessment for English language proficiency, and return testing materials.

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An LEA receiving Title III LEP funding shall...

1. Increase the English proficiency of ELLs as demonstrated by student achievement.
2. Provide high quality professional development (PD).

These are required activities

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Title III Authorized Activities For LEP Funding

- Curricular Materials
- Technology
- Intensify Instruction
- Support personnel
- Tutorials, mentoring, academic or career counseling
- Community Programs/Services
- Parental Involvement/Outreach
- Supplemental Instructional Services
- Family Literacy Services

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LEA responsibilities for Immigrant Children and Youth (ICY) Funding

(1) IN GENERAL- An eligible entity receiving funds under section 3114(d)(1) shall use the funds to pay for activities that provide enhanced instructional opportunities for immigrant children and youth, which may include:

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ICY Funding Activities

- (A) family literacy, parent outreach, and training activities designed to assist parents to become active participants in the education of their children;
- (B) support for personnel, including teacher aides who have been specifically trained, or are being trained, to provide services to immigrant children and youth;
- (C) provision of tutorials, mentoring, and academic or career counseling for immigrant children and youth;

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ICY Funding Activities

- (D) identification and acquisition of curricular materials, educational software, and technologies to be used in the program carried out with funds;
- (E) basic instruction services that are directly attributable to the presence in the school district involved of immigrant children and youth, including the payment of costs of providing additional classroom supplies, costs of transportation, or such other costs as are directly attributable to such additional basic instruction services;

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ICY Funding Activities

- (F) other instruction services that are designed to assist immigrant children and youth to achieve in elementary schools and secondary schools in the United States, such as programs of introduction to the educational system and civics education; and
- (G) activities, coordinated with community-based organizations, institutions of higher education, private sector entities, or other entities with expertise in working with immigrants, to assist parents of immigrant children and youth by offering comprehensive community services.

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Professional Development Must Be...

- Designed to improve the instruction and assessment of LEP children;
- Designed to enhance teachers' ability to understand and use curricula, assessment measures and instruction strategies;
- Be based on scientifically based research; and
- Be of sufficient intensity and duration.

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Type of Professional Development Activity

As defined by USDE, PD reporting categories include:

- Instructional strategies for LEP students
- Understanding and implementation of assessment of LEP students
- Understanding and implementation of ELP standards and academic content standards for LEP students
- Alignment of the curriculum in language instruction educational programs to ELP standards
- Subject matter knowledge for teachers
- Other (Explain)

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LEAs Must Maintain PD Data.

Data must include:

1. Type of professional development activity.
2. Number of participants attending each type of PD activity. (see next screen)
3. Participant information.

**REPORTING REQUIREMENTS
INCLUDE...**

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Participant Information Required by USDE

Within each PD activity listed on the previous screen, LEAs must report the # of participants in each PD activity.

PARTICIPANT CATEGORIES ARE:

- content classroom teachers
- LEP classroom teachers
- principals
- administrators/other than principals
- other school personnel/non-administrative
- community-based organization personnel

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Sample USDE PD and Participant Data Table

Type of Professional Development Activity	# Subgrantees	
Instructional strategies for LEP students		
Understanding and implementation of assessment of LEP students		
Understanding and implementation of ELP standards and academic content standards for LEP students		
Alignment of the curriculum in language instruction educational programs to ELP standards		
Subject matter knowledge for teachers		
Other (explain in comment box)		
Participant Information		
	# Subgrantees	# Participants
PD provided to content classroom teachers		
PD provided to LEP classroom teachers		
PD provided to principals		
PD provided to administrators/other than principals		
PD provided to other school personnel/non-administrative		
PD provided to community-based organization personnel		
Total		

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eGrant Data Collection



Program Year is currently 2007 - 2008 System Will Timeout at 8:12:12 PM

Type of Professional Development Activity for 2007-2008

In the table below, check which professional development activities were provided with Title III funds in the 2007-2008 project year (July 1, 2007 - September 30, 2008):

<input checked="" type="checkbox"/>	Instructional strategies for LEP students
<input checked="" type="checkbox"/>	Understanding and implementation of assessment of LEP students
<input type="checkbox"/>	Understanding and implementation of ELP standards and academic content standards for LEP students
<input checked="" type="checkbox"/>	Alignment of the curriculum in language instruction educational programs to ELP standards
<input checked="" type="checkbox"/>	Subject matter knowledge for teachers
<input checked="" type="checkbox"/>	Other (explain in comment box)
List all comments for 'Other'	
<input type="text"/>	

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eGrant Data Collection (cont.)

Participant Information – In the table below provide the number of participants (teachers, administrators and other personnel) who participated in the professional development (PD) activities reported.

Activity	Number of Participants
PD provided to content classroom teachers	<input type="text"/>
PD provided to LEP classroom teachers	<input type="text"/>
PD provided to principals	<input type="text"/>
PD provided to administrators other than principals	<input type="text"/>
PD provided to other school personnel/non-administrative	<input type="text"/>
PD provided to community-based organization personnel	<input type="text"/>
Total	<input type="text"/>

[Complete List of Grant Session Variables](#)

Project ID =
COOKIE - project_id =

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Appropriate Use of Funding

Funds *must be* used for programs and activities that will supplement, not supplant, the core ESL program.

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Supplement not Supplant General Principle

The Title III supplement not supplant requirement is intended to ensure that supplemental services provided with Title III funds are in addition to, and do not replace or supplant, supplemental services that students would otherwise receive.

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Title III Supplement not Supplant Requirement

- Title III funds must be used to supplement the level of Federal, State, and local funds that, in the absence of the Title III funds, would have been expended for programs for ELLs and immigrant children and youth (ICY).

Section 3115(g) of ESEA

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Test of Supplanting

Supplanting exists if Title III funds are used to provide services :

- That the LEA is required to provide under State, local, or other federal laws.
- That it provided in the prior year with State, local, or other federal funds.

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Therefore, Title III Funding...

may not be used to provide core instructional programming, hire staff, pay for assessment of ELLs, and/or provide resources/materials that would be required and/or needed to implement a program under PA School Code Chapter 4.26. Doing so would demonstrate supplanting rather than supplementing.

For more information on Chapter 4.26 v. Title III, review the Parent Consent document located on the PDE ESL web page.

<http://www.pde.state.pa.us/esl>

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Determination of Supplanting

Any determination about supplanting is very fact specific, and it is difficult to provide general guidelines without examining the details of individual situations.

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TITLE III

- LEAs with ELLs receive funding for LEP required and authorized activities for ELLs.
- **ONLY** LEAs with an **INCREASE** in Immigrant Children and Youth (ICY) receive funding for required and authorized activities for ICY. ICY funds are found on the rider of the Title III application funding agreement.
- LEAs must be able to report on required and authorized activities conducted with LEP and/or ICY funds.

THESE FUNDS, ALTHOUGH RELATED, ARE MAINTAINED SEPARATELY FOR REPORTING SUPPLEMENTAL SERVICES AND PROGRAMS PROVIDED.

FUNDS SHOULD NOT BE COMINGLED.

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Allocation Minimum

- LEAs that are eligible for a \$10,000 allocation may apply individually **OR** choose to join a consortium.
- LEAs with less than a \$10,000 allocation **must** enter into a consortium to accept the funds.

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Consortium Responsibilities

- **Must meet all Title III requirements just as any individual LEA.**
- **Participating LEAs entering a consortium must develop a written Memorandum of Understanding (MOU) or other written alternative arrangement for meeting Title III requirements.**
- **LEAs that enter a consortium must work with the consortium lead to enter into agreement for the program/services that will be provided to member LEAs.**

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Consortium Fiscal Agent Role

- LEAs in a consortium must designate one of the LEAs as fiscal agent in the Title III grant application to the SEA.
- Fiscal agents must ensure all LEAs fulfill their fiscal and programmatic responsibilities, including meeting AMAOs as per the MOU.
- An educational service agency (IU) that is the designated fiscal agent has the same responsibilities as any LEA.
- The fiscal agent maintains all funding for its member LEAs.

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MOUs should include...

The responsibilities of the consortium lead and its member LEAs including but not limited to:

- ✓ Required English proficiency and PD plan,
- ✓ Other authorized activities,
- ✓ Parental notification – program placement and AMAOs,
- ✓ Improvement plan responsibilities if the consortium fails to meet AMAOs for 2 consecutive years,
- ✓ How the funds will be spent among member LEAs, AND
- ✓ Non-public/private school contact procedure for participation in Title III SUPPLEMENTAL funding.

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Parent Notification Requirements

Parent notification of **Title III Supplemental Programs** must take place within 30 days after the beginning of the school year and within 14 days of enrollment within the LEA during the school year .

Title III 20 USC 7012 Section 3302 Parental Notifications

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Parent Notification Requirements

If a child is identified for and placed in a Title III supplemental program, LEAs must inform parents of the...

- Identification process
- Assessment results and academic status
- Method of instruction
- How the program will meet the educational strengths and needs of the child

CONTINUED...

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Parent Notification Requirements

- How the program will specifically help the child learn English and meet academic achievement standards for grade promotion and graduation.
- Specific exit requirements, the expected rate of transition into all-English classrooms and, if funds are used at the secondary level, the expected rate of graduation.
- How children with a disability, and those with an individualized education plan, will have their LEP needs met.

Refer to the LEA's ESL Program Plan and/or include relevant pieces of the general program description with the letter.

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Parents May...

- Have the right to immediately remove their child from **Title III supplemental programs** upon their request.
- Have the right to decline enrollment in the **Title III supplemental program** or choose another program or method of instruction, if available.
- Request the LEA's assistance in selecting among various programs and methods of instruction offered by Title III.

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To provide communications for non-English speaking parents/students in other languages, please visit **WWW.TRANSACT.COM**
An account login is necessary.



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REVIEW

If a LEA receives TITLE III LEP funding, it:

- Shall increase student English proficiency.
- Shall provide professional development.
- May choose among other authorized activities after meeting the requirements of English proficiency and PD.
- Notify parents of a child's TITLE III SUPPLEMENTAL program eligibility.
- LEAs in consortia must enter into a written MOU with the lead LEA and its member LEAs for programming, services, and accountability related to Title III.

What's New?

- **Collection of detailed PD data and participant information on the eGrant System.**

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Annual Measurable Achievement Objectives (AMAOs)

To measure *student's development and attainment of English proficiency while meeting challenging State academic content and student academic achievement standards required by section 1111(b)(1).*

Title III 20 USC 6842 (a)(1)

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Performance targets that include:

Making progress toward English language proficiency as measured by the state English language proficiency (ELP) assessment (currently the ACCESS for ELLs®)

Attaining English language proficiency as measured by the ACCESS assessment

Meeting AYP as measured by the state content assessment (PSSA/PASA)

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Consortia and AMAOs

How does a SEA determine whether a consortium has met Title III AMAOs?

A SEA must aggregate the data from all LEAs in the consortium to determine if the consortium as a whole met each of the Title III AMAOs.

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Consortia and AMAOs
CONTINUED

How should a consortium notify parents if it fails to meet Title III AMAO targets?

The fiscal agent must ensure that notice is provided to parents. The fiscal agent may either delegate this responsibility to each member of the consortium, or the fiscal agent may choose to notify all parents served by the consortium.

This should be included in the MOU.

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Consortia and Improvement Plans

The fiscal agent is responsible for ensuring that an improvement plan is developed and submitted to the SEA.

- *May delegate the drafting of plan to LEA members*
- *Plan must include the specific areas that caused failure to meet AMAOs and include specific areas that caused the consortium to not meet AMAOs*

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Parent Notification Requirements

Failure to meet AMAOs



- A separate parent notification is needed when a LEA fails to meet AMAOs in any fiscal year.
- Parents must be notified not later than 30 days after the failure occurs.
- The notice must be provided in an understandable format and, to the extent practicable, in a language the parent can understand.


Title III 20 USC 7012 (b)(c)

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Non-Public (NP) and Private School Participation

WHO?, WHAT?, HOW?



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NP and Private School Participation

- Timely and meaningful consultation
- Equitable services and participation
- Provision of supplemental services
- Identification and Assessment
- AMAOs
- Private School Student Count
- The LEA IS NOT OBLIGATED TO PROVIDE A CORE PROGRAM AS PER CHAPTER 4.26

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Consultation



- Send letter to schools **within the geographic boundaries** served by the LEA
- Meet and discuss
- Determine equitable services based on funding

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Consultation Requirements

- How needs of LEP students will be identified
- What supplemental services will be offered
- How, where, and by whom supplemental services will be provided
- Assessment of supplemental services and use of assessment results to improve services
- Size and scope of services to be offered to private school students and educators
- Amount of funds available
- Delivery of supplemental services

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Provision of Supplemental Services

- The LEA employees, or third party LEA contractors, must provide the supplemental services.
- The LEA may not give funds directly to the the non-public school. The LEA must retain control of the funds.

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Equitable Supplemental Services and Participation

- Supplemental services do not have to be identical to those provided to public school students and educators.
- Supplemental services must be equitable and timely and address private school student and educator needs.
- Funds are based on private school student numbers the same as funds for public school children.

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AMAOs

Non-public schools are not required to meet the Title III AMAOs

BUT

this must be determined *at the time of consultation and be part of the written agreement.*

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LEA RESPONSIBILITY

The LEA maintains the final responsibility for ELL identification and eligibility for ***Title III supplemental programs.***



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Student Count for Non-Public Schools

- LEAs shall include currently identified ELLs in private schools by including the student count on the designated screen in the LEP SYSTEM.
- LEAs CANNOT anticipate future student counts and may only report currently identified ELLs for Title III funding.

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NP School Participation Documents and Guidance

<http://www.pde.state.pa.us/esl/cwp/view.asp?a=3&Q=100957&eslNav=|6445|&eslNav=|5743|>

Included resources are:

- [Q&A for Title III Non-Public School Consultation](#)
- [Q&A for Title III Non-Public School Consultation](#)
- [Sample Letter for Non-public Title III Participation](#)
- [Sample Letter for Non-public Title III Participation](#)
- [USDOE Presentation on Non-public Private School Participation Under Title III](#)
- [Title III Private School Participation](#)

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Thank You!

Contact Information

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Title III Application Process

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Title III Program Manager
Pennsylvania Department of Education
Division of Federal Programs

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Allocations

- 2007/2008 Title III Allocation?
\$11,342,519

- 2008/2009 Title III Allocation:
\$11,325,615

- 2009/2010 Title III Allocation: ???

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2008/2009 Data Collection Required by USDE

Why?

- Required by USDE

Who?

- All LEA's that received Title III on their own
in 2008-2009
and
- Consortium leads that received Title III for
2008-2009

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2008/2009 - Data Collection Required by USDE

What?

- LEA's must keep track of the impact of
Professional Development activities used
with Title III funding for 2008-2009

When?

- Report will open from October 1-31,2009

Where?

- E-grants
 - Main Menu-Title III 2009-2010 PD

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**QUESTIONS: REGARDING ALLOCATION,
APPLICATION, TIMELINE AND EGRANT SYSTEM**

Contact:

Division of Federal Programs: 717 783-2193

Regional Coordinators

- | | | |
|---------------------|--------------------|--------------|
| • Virginia Baker: | IUs 1, 3 | 717 783-9164 |
| • Norma Hull: | IUs 8, 11, 16 | 717 783-7790 |
| • Don McCrone: | IUs 10, 17, 18, 19 | 717 783-6902 |
| • Susan Popielski | IUs 2, 26 | 717 783-1330 |
| • Cindy Rhoads: | IUs 15, 22, 23, 25 | 717 783-9167 |
| • Veronica Shaffer: | IUs 5, 6, 9 | 717 783-6904 |
| • Karl Streckewald: | IUs 4, 7, 27, 28 | 717 783-3381 |
| • George Raynes | IUs 14, 20, 21, 29 | 717 783-7815 |
| • Amy Walter | IUs 12, 13, 24 | 717 783-6829 |

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2009-10 Title III Application

- The electronic application is on the Division of Federal Programs eGrant System.
- Must print and mail signed application to PDE.
- Start date is the data the authorized officer signs the application or the date received in the Division of Federal Programs, the later of these two.

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**Title III Allocations for
2009-2010**

- 2009-2010 Title III Allocations will be based on the numbers taken from:
 - PIMS (LEP and immigrant count entered by each LEA)
 - LEP system (Number of non public students)
- Both LEP and PIMS will close ???
- LEA's are responsible for the accuracy of the numbers entered.

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2009-10 Application Timeline

- eGrant application opened for entry *June 1
- Preliminary allocations available on the Division of Federal Programs website *June 1
- Application submit button activated *June 1
- Application due date *July 1

* Estimated dates subject to change.

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Fiscal Requirements

- **Quarterly Reports**
 - Continued monthly payments
 - Due on the 10th working day of January, April, July and October
 - Submitted on line via the PDE Web Portal/FAI System
 - Submitted to the Labor, Education Comptrollers Office
 - Funds will be suspended if quarterly report is not submitted by due date.

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Fiscal Requirements (Contd.)

- **Final Expenditure Reports (FER)**
 - Closes projects by reporting that funds have been expended in compliance with the approved budget.
 - Due as soon as the project funds are spent but no later than 30 days after the termination of the project.
 - Completed online through the e-Grants System
 - Final budget must match expenditures on the FER

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Monitoring of Title III

- Title III is part of the Division of Federal Programs' (DFP) Consolidated Program Review.
- Monitoring is conducted on a 3 year cycle.
 - Schedule is available on the Division of Federal Programs website.
 - Consortium lead is monitored with follow up visit to one or two of the consortium districts.

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Determining Allocations for LEP Funding

- Funding is determined by the number of LEP students reported to PDE on the PIMS SYSTEM.
- Allocations are based on a per pupil LEP student amount.
- All LEAs must complete the PIMS SYSTEM and the LEP SYSTEM regardless of their intent to apply for Title III funds.

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Requirements

- Title III funding has both required and authorized activities.
- Required activities must be carried out by all LEAs receiving Title III funds.
Refer to the Title III Updates Presentation to for specific information on required and authorized activities.
- The following screens outline other appropriate uses of Title III funding.

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Appropriate Uses of LEP Funds

- Curricular Materials
- Technology
- Intensify Instruction
- Support personnel
- Tutorials, mentoring, academic or career counseling
- Community Programs/Services
- Parental Involvement/Outreach
- Supplemental Instructional Services
- Family Literacy Services

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Determining Allocations for Immigrant Funding

- A discretionary allocation is given to LEAs with an increase in immigrant children.
- Formula to determine the immigrant allocation is prescribed by USDE.
- LEAs that receive an immigrant allocation must use these funds for immigrant children.

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Appropriate Uses of Immigrant Funds

- Activities that provide enhanced instructional opportunities for immigrant children and youth.
- Support for personnel, including teacher aides specifically trained (or are being trained) to provide services to immigrant children and youth.
- Supplemental instruction services.

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Appropriate Use of Immigrant Funds (Contd)

- Other instructional services designed to assist children to achieve in elementary and secondary schools in the U.S.
- Activities coordinated with community-based organizations, institutions of higher education, private sector entities or other entities to assist parents by offering comprehensive community services.

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Restrictions

- The LEA may use up to 2% of their allocation for administrative costs.
- Regardless of the LEA's State approved indirect cost rate, administrative costs may not exceed 2%.

Although the eGrant System may show a higher allowable indirect cost rate, it may NOT exceed 2%.

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RESOURCES

- www.pde.state.pa.us/esl
- <http://www.pde.state.pa.us/k12/cwp/view.asp?a=166&Q=45958&k12Nav=|3137|&k12Nav=|1141>
- <http://www.ed.gov/about/offices/list/oii/nonpublic/title3-factsheet.html>
- <http://www.ed.gov/about/offices/list/oii/nonpublic/title3-factsheet.html>
- www.transact.com
- www.ed.gov
- <http://www.ncela.gwu.edu/>

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