

TITLE III GRANTS – CROSSING THE FY 2019 FINISH LINE

MAY 2018 PELL MEETING

OFFICE OF ENGLISH LANGUAGE ACQUISITION SERVICES

ARIZONA DEPARTMENT OF EDUCATION



NICOLE VON PRISK, DIRECTOR OF TITLE III AND EL FUNDING

MARY RICCI-MARRIOTT, TITLE III FISCAL SPECIALIST

SESSION GOALS

We are here to help you

- plan for upcoming submission deadlines,
- interpret the fiscal and programmatic feedback and make necessary edits to the Title III grant application and Integrated Action Plan,
- ensure compliance with Title III grant requirements, and
- understand LEA obligations under other Federal and State laws.

**OELAS wants you to cross the finish line to
Application Approval!**



IMPORTANT DATES AND DEADLINES

FY 2019 TITLE III TIMELINE - ORIGINAL APPLICATIONS

OELAS Tasks	Due Date	LEA Tasks
	February 1, 2018	Revisit and revise FY 2018 Comprehensive Needs Assessment (CNA) and Integrated Action Plan (IAP) to determine FY 2019 needs
Begin review of all submitted applications and IAPs	March 1, 2018	Begin the FY 2019 funding application and IAP
	May 1, 2018	Ensure submission of the FY 2019 Original Application and IAP by this date
Anticipated approval of all FY 2019 Original Applications	July 1, 2018	

FY 2019 TITLE III TIMELINE - REALLOCATIONS

OELAS Tasks	Due Date	LEA Tasks
Receive final FY 2019 Federal award and calculate final allocations	July 2018	
Communicate final allocation amounts to all eligible LEAs	August 2018	Create a revised budget which includes additional FY 2109 funds
Submit reallocation file to Grants Team	October 2018	
Load additional FY 2019 funds into existing applications	November 2018	Revise FY 2019 application in GME; submit FY 2019 Application Revision by late November (actual date TBD)
Target date for Application Revision approvals	December 15, 2018	

FISCAL VS PROGRAMMATIC REVIEW



FISCAL REVIEW – REQUIRED COMPONENTS

Federal Requirements

- Effective language instruction educational programs for English learners
[Title III, Section 3115 (c) (1)]
- Professional Development
[Title III, Section 3115 (c) (2)]
- Parent, Family and Community Engagement
[Title III, Section 3115 (c) (3)]
- Integrated Action Plan
[Title III, Section 3116 (a) (b)]
- Reasonable, allowable and allocable costs
[Uniform Grant Guidance UGG]

State Requirements

- Follow USFR Chart of Accounts for accounting codes
 - Uniform System of Financial Records For Arizona School Districts
- <https://www.azauditor.gov/sites/default/files/USFR9817.pdf>
 - Uniform System of Financial Records For Arizona Charter Schools
- <https://www.azauditor.gov/sites/default/files/USFRCS.pdf>

Consortia Requirements

- Lead Agent Funding Forms
- Participating LEA Member – Certification and Assurances

FISCAL REVIEW - EXPENDITURES

- 2% cap on Direct Administration - Title III SEC.3115(b)
 - (Administration = admin, clerical and program management)
- Indirect Costs are allowable
- Supplement, not Supplant – Title III SEC.3115(g)
 - compare with previous year applications
 - verify other legal requirements (Title I, Title VI, SEI Model)
- Math calculations
 - line item totals must match narrative descriptions
 - benefits within customary 25%, or details provided
 - FTE is proportionate to salary request, and duties and responsibilities
- Expenditures in application = Title III tag in Integrated Action Plan

PROGRAM REVIEW – SUPPLEMENTAL ACTIVITIES

- Ensure activities are:
 - only provided for ELs.
 - in addition (not more of the same) to what is being provided for non- ELs.
 - **not** provided with other Federal, State, or local funds.
 - supplemental to the LEA's civil rights obligations to ELs under Title VI and the Equal Educational Opportunities Act (EEOA).
- Review comprehensive IAP details to identify programs/services/materials made available with other funds.

PROGRAM REVIEW - INTEGRATED ACTION PLAN (IAP)

- Confirm and verify alignment between the Integrated Action Plan (IAP) and the funding application.
- Ensure narratives in the IAP and/or the funding application fully describe EL programs/services/materials.

PROGRAM REVIEW – IAP TAGGING



Green tags = Funding

Title III funds support the program or activity.

FY18 IAP tag: TIII

FY19 IAP tag: FY19_TIII

<input type="checkbox"/>	FY19_MOWR
<input type="checkbox"/>	FY19_SIG
<input type="checkbox"/>	SIG
<input type="checkbox"/>	CS
<input type="checkbox"/>	FY19_CS
<input type="checkbox"/>	FY19CSGRAD
<input type="checkbox"/>	PD
<input type="checkbox"/>	CSI
<input type="checkbox"/>	TSI
<input type="checkbox"/>	TI-SW

Blue tags = Support for ELs

Other funds support the program or activity but EL students benefit.

FY18 and FY19 IAP tags: ELL

Action steps should have **EITHER** a Title III funding tag **OR** an ELL program tag, not both.

PROGRAM REVIEW – ONE IAP, TWO FISCAL YEARS' TAGS

STOP!!



Don't change FY 2018 tags.

Tagging the FY 2019 Integrated Action Plan (IAP)

1. Adding a new FY 2019 expense = new action step + *FY19_TIII* tag + due date to reflect the FY 2019 project period.
2. Keeping the same FY 2018 expense/action step = add *FY19_TIII* tag + extend due date to include FY 2019.

PROGRAM REVIEW – ONE IAP, TWO FISCAL YEARS' TAGS continued

STOP!!



Don't change FY 2018 tags.

Tagging the FY 2019 Integrated Action Plan (IAP)

3. Changing an FY 2018 action step in any way (for example, the FTE, number of staff, names of trainings, etc.),

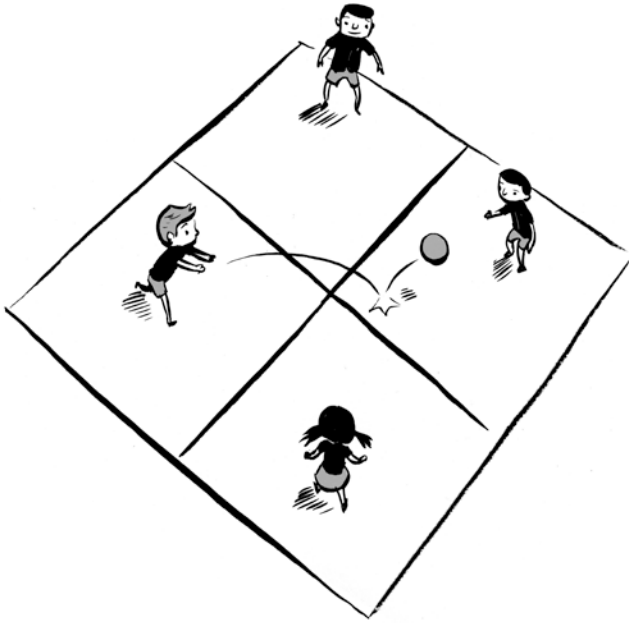
-EITHER-

create new action step + *FY19_Thru* tag + due date to reflect the FY 2019 project period.

-OR-

revise existing action step to clearly identify the change for FY 2019 + *FY19_Thru* tag
+ extend due date to include FY 2019.

FOUR SQUARE ACTIVITY - GROUP REFLECTION



- Designate a time-keeper and a scribe.
- Using the paper at your table, the scribe will label Quadrant 1 “Positives” and label Quadrant 2 “Challenges”
- Time-keepers will set a two minute timer on their cell phone and begin at the signal.
- Tablemates will share their FY19 “positive” submission stories with each other. Scribes will write as many ideas as time allows.
- When given the signal, repeat the activity for submission “challenges.”



INTERPRETING APPLICATION AND IAP FEEDBACK



SUPPLEMENT, NOT SUPPLANT (SNS) – WHAT IS IT?

Title III funds must add to (supplement) and not replace (supplant) funds made available from other Federal, State, or local funds.

- Supplanting exists if funds are used to:
 - provide programs/services which are provided to non-EL students,
 - provide programs/services required by other Federal, State, or local laws, and
 - provide programs/services previously funded with Federal, State, or local funds.
- Determining if a cost is supplemental is situation specific in each LEA.
- Supplanting rules for Title III are NOT the same as for other Title funds.

WHY DOES SNS MATTER?

- The supplement, not supplant (SNS) provision is designed to protect English learners and the funding that LEAs are entitled to receive on their behalf.
- Title III funds provide LEAs with additional financial resources to meet the unique instructional needs of English learners.
- EL students (and their families) must be provided the same opportunities as non-ELs.
- Title III funds are not intended to fill in the funding gaps.

LEA OBLIGATIONS OUTSIDE OF TITLE III

All LEAs have obligations to English learners and limited English proficient parents under Title VI of the Civil Rights Act of 1964 and the Equal Educational Opportunities Act (EEOA).

- Meaningful and equal participation

<https://www2.ed.gov/about/offices/list/ocr/docs/dcl-factsheet-el-students-201501.pdf>

- Parent communication

<https://www2.ed.gov/about/offices/list/ocr/docs/dcl-factsheet-lep-parents-201501.pdf>

Title III funds may not be used for programs or services required as part of an LEA's civil rights obligation.

ACTIVITIES REQUIRED UNDER OTHER LAWS

- AZELLA testing and any testing-related activities
(required by state and federal law)
- Translating of required communication, sharing common information, communicating with parents in a language they can understand
(required by Title VI of the Civil Rights Act of 1964)
- Writing ILLPs
(required by state law)
- SEI Endorsement coursework
(required by state law)

FISCAL AND PROGRAMMATIC CHANGES FOR FY 2019



2% LIMITATION AND INDIRECT COSTS

Federal requirements limit LEA spending for direct administrative expenses
- Title III SEC. 3115 (b)

- In the previous rule under NCLB, the 2% limitation included both direct administrative expenses AND indirect costs.



Under ESSA, direct administrative expenses and indirect costs are two independent calculations.

- **Calculation #1:** Direct administrative expenses (function codes 2300, 2400, 2500, 2900) may not exceed 2% of the current year award amount.
- **Calculation #2:** The approved indirect cost rate may be applied to the balance of the total budget amount (current year plus carryover) minus direct administrative expenses and/or capital items at a per unit cost of \$5000.

CODING CHANGES FOR CONFERENCES AND TRAININGS

USFR Chart of Accounts: Function Code 2213

- Instructional Staff Training—Activities associated with the professional development and training of instructional personnel....and other activities related to the ongoing growth and development of instructional personnel.

USFR Chart of Accounts: Function Code 2570

- Noninstructional Personnel Training—Activities associated with the professional development and training of noninstructional personnel.
- Due to workshop content, EL Coordinator Boot Camp and the PELL Meeting must be coded in this function code.
- Function Code 2570 impacts the 2% cap for direct admin

CONSORTIUM DOCUMENTATION

Lead Agent Funding Forms

- **NEW** Assurance: Provide a copy of the Memorandum of Understanding (MOU) to participating members
- **REMOVED:** MOU Signature page (now embedded in the *Participating LEA Member – Certification and Assurances* documents)

Participating LEA Member – Certification and Assurances

- **NEW** Assurance: Acknowledge receipt of the MOU from the lead agent
- **RECOMMENDED:** Provide an electronic copy of the Title III portion of Integrated Action Plan to the lead agent

Funding Application

- **RECOMMENDED:** Provide an electronic copy of the Title III application to each member

CAPITAL/EQUIPMENT CODING

Capital

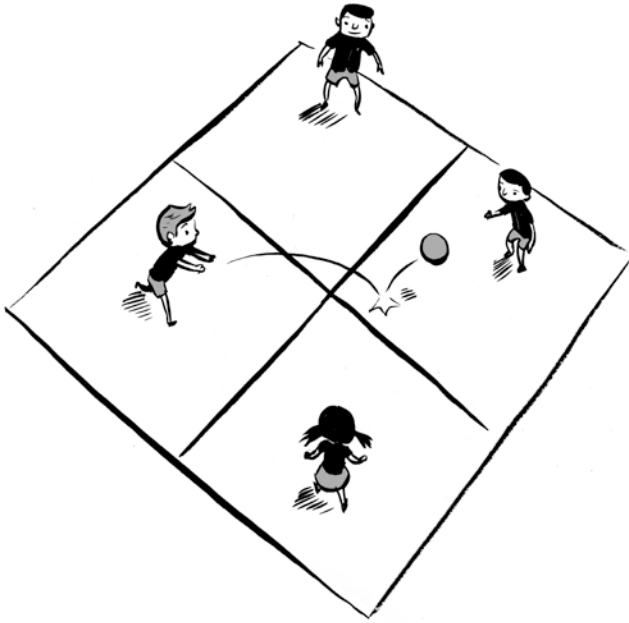
- Federal threshold is \$5000 per unit cost
- Object codes 6733, 6736, 6739 for public districts / Object code 0190 for charters

Equipment

- State has no dollar threshold
- Object codes 6731-32, 6734-35, 6737-38 for public districts / Object code 6600 for charters
- USFR Chart of Accounts defines equipment items
- Items not specifically identified in USFR must meet ALL criteria below to be considered equipment
 - useful life of at least a year,
 - typically repaired rather than replaced, AND
 - the unit does not lose its identity through incorporation into a different unit.

Capital outlay worksheet required in GME for capital and technology related equipment

FOUR SQUARE ACTIVITY - FINDING SOLUTIONS



- Using the paper at your table, label Quadrant 3 “Solutions” and label Quadrant 4 “Contacts”
- Designate a new time-keeper and a new scribe.
- Time-keepers will set a two minute timer on their cell phone and begin at the signal.
- Tablemates will select one or two submission “challenges” and brainstorm possible solutions or suggestions for improvement. Scribes will write as many ideas in Quadrant 3 as time allows.
- Tablemates will each enter their name and LEA affiliation in Quadrant 4.





WHERE TO FIND HELP ONLINE

U.S. Department of Education – Every Student Succeeds Act (ESSA)

<https://legcounsel.house.gov/Comps/Elementary%20And%20Secondary%20Education%20Act%20Of%201965.pdf>

Office of Civil Rights

<https://www2.ed.gov/about/offices/list/ocr/ellresources.html>

Arizona Department of Education – Office of English Language Acquisition Services – (602) 542-0753

<http://www.azed.gov/oelas/>

Arizona Auditor General – USFR Chart of Accounts

Arizona School Districts: <https://www.azauditor.gov/sites/default/files/USFR9817.pdf>

Arizona Charter Schools: <https://www.azauditor.gov/sites/default/files/USFRCS.pdf>