



Richard Woods, Georgia's School Superintendent
"Educating Georgia's Future"

Frequently Asked Questions

Title I, Part A and Title III, Part A Parent, Family, & Community Engagement to Support English Learners (ELs)

1. Can districts continue to fund a parent engagement coordinator/specialist/etc. from Title III?

Title III-funded parent, family and community engagement activities must be supplemental to those required under state, Office for Civil Rights (OCR) or Title I and, to adhere to new Title III requirements under Sec. 3115 (c)(3), they must “enhance or supplement” the LEA’s Title III-funded language instructional program.

In addition to this new Title III requirement, in Title III, Section 3115(d)(6) of the Every Student Succeeds Act (ESSA), there are also *allowable* activities that permit EL outreach programs:

Providing community participation programs, providing family literacy services, and providing parent and family outreach and training activities to English learners and their families for the purpose of improving EL students’ English language skills *and* assisting parents and families in helping their children to improve their academic achievement and in becoming active participants in their children’s education.

Thus, to be funded under Title III, the parent engagement staff responsibilities must be one or more of the required or allowable activities, which themselves must clearly align with the above-stated purpose of Title III outreach, *and* be above and beyond that which districts are responsible for under Title I, Section 1112(e)(3)(C).

2. How does this affect funding for translations/interpretations?

The answer to this depends on how your district funds translation and interpretation services. Local or state funds must be used to pay for translations of documents that are provided to all parents (field trip forms, report cards, discipline handbooks, transportation information, etc.) Similarly, oral communications with the general parent population (parent-teacher conferences, non-Title program related school meetings, academic counseling, ‘robo-calls’, etc.) must be interpreted for EL parents using local funding. Required state/school parent/teacher conferences, Individualized Education Program (IEP) meetings, OCR notifications, student/discipline handbooks, and any other



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documents/meetings are the responsibility of the LEA and must be paid for with state/local funds. For more information, refer to OCR's [Information for Limited English Proficient \(LEP\) Parents and Guardians and for Schools and School Districts that Communicate with Them](#) Fact Sheet.

Title I funds for translations/interpretations for EL parents are still limited to Title I sponsored/required activities. A Title I family engagement activity, a Title I Newsletter, Title I required notifications, Annual Title I Meeting, and so on can be translated/interpreted using Title I funds at [Title I Schools](#). If a district decides to implement "Title I – like" activities/handouts at non-Title I schools, the translation/interpretation will become the responsibility of the LEA and thus require use of local funding sources.

3. Can districts continue to fund adult literacy/English classes from Title III funds?

If districts offered these courses to comply with the Parental Participation requirements of No Child Left Behind, Section 3302(e), those requirements have now moved to Title I, Section 1112(e)(3)(C) and continuing those classes under the ESSA should be a joint decision made between LEA Title III and Title I staff. Title I, Part A, Section 1116(e)(7) of the ESSA states that LEAs and Title I schools "may provide necessary literacy training from funds if the LEA has exhausted all other reasonably available sources of funding for such training." Title I funds can support adult literacy classes if identified as a need in the school/district comprehensive needs assessment (CNA). However, if classes are designed to lead to a GED type diploma, Title I cannot pay for the actual exam, as Title I funds can only lead to a regular school diploma. However, once Title I fulfills their new Parental Notification and Participation Requirements under the ESSA, Title III funds may support outreach activities held for the goal and purposes listed in question 1. For information regarding GED student scholarships, please contact the Technical College System of Georgia's Certified Literate Communities at <https://tcsg.edu/adult-education/certified-literate-community-program-clcp/>.

4. Which ELs should participate in supplemental English language supports? Which federal program can fund these supplemental services?

All LEAs must provide the core, state-funded English to Speakers of Other Languages (ESOL) language instruction educational program to all students who qualify as ELs. LEAs may also choose to use other federal, state or local funds to supplement their ESOL program for the benefit of those ELs with the greatest linguistic needs. In such cases, the Georgia Department of Education (GaDOE) recommends that Federal Programs Directors collaborate with ESOL staff in the district and, together, discuss how federal funds might be best used to support supplemental English language services.



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The GaDOE also recommends that LEAs that are not benefiting from Title III funding encourage Title I and ESOL staff to coordinate in determining which ELs would be most in need of supplemental language support and which supplemental services funded by Title I allocations may be appropriate and/or available. Any identified needs and goals related to providing supplemental English language supports in Title I schools must be included in the District/School Comprehensive Needs Assessment and District/School Improvement Plans and/or Title I plans.

LEAs that do receive a direct Title III allocation may use their funds to serve ELs enrolled in Title I and non-Title I schools. However, Title I allocations must not be used to serve ELs enrolled in non-Title I schools.

5. Who is responsible for notifications to parents of ELs?

The notification of a child's initial/continued eligibility for ESOL services is the responsibility of the local school staff.

6. Who is responsible for notification to parents of federally-funded supplemental services for ELs?

Although any staff member may distribute the notification, it is the responsibility of the district's Title I staff to document that parents of ELs were notified of participation in a federally-funded supplemental English language support service per Section 1112(e)(3) and Section 1112(e)(4).

It is an LEA's decision as to who in the district is responsible for the dissemination of this Title I notification. However, Title I staff are accountable.

7. How does this notification impact parents of ELs in non-Title I schools?

Title I, Part A, Section 1112(e)(3)(A) requires *an LEA* to disseminate a Title I-compliant notice that informs parents if their EL student is being offered federally-funded supplemental language services. Thus, if Title I or Title III funds are intended to be used to supplement an EL's ESOL program, the LEA is responsible for ensuring that the EL's parent is informed of this supplemental offering. The notice, among other things, offers the parent the choice to allow or refuse the title-funded service.

As this is an LEA-level requirement, it must be fulfilled by all LEAs in receipt of Title I funds that puts either Title I or Title III funds to use in supporting a student's supplemental language instructional program. It is not a school-level requirement and thus a school's status as Title I or non-Title I is not relevant. (Parents of EL students who are **not** provided supplemental language support through Title I or Title III should not be given a notice advising them of their child being offered federally-funded supplemental language services.)



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However, since Title I funds cannot serve non-Title I School students, LEAs may use local funds or district Title III funds to meet the parent notification requirement (per the U.S. Department of Education's (USDE) Non-Regulatory [Guidance](#), question A-4, September 2016. Note that this interpretation will be revised as additional guidance from USDE is provided to SEAs). As always, LEAs are encouraged to select a cost-effective method to notify parents. For example, methods such as sharing in a parent-teacher conference, sending a secure email message, and using a password-protected LEA's parent portal access to a message do not require additional funds.

The GaDOE will monitor for compliance with the federal requirement that **any** parent whose student is offered Title-funded supplemental language support has been provided the appropriate notification (whether or not his/her school is a Title I school).

8. Will the parent and family engagement component of monitoring change?

The GaDOE team who monitors compliance of parent and family engagement requirements of Title I, Part A, focuses on Section 1116. Beginning in the 2017-2018 school year, the GaDOE team reviewed documentation for Title I, Part A, Section 1112(e)(3)(A) in addition to Section 1116. Section 1112(e)(3)(A) requires LEAs to notify parents of participating ELs the reasons for identification of their child as qualifying for placement in a Title-funded supplemental language instruction educational program as well as other specific requirements.

9. How has cross-functional monitoring changed since FY18?

Cross-functional monitoring changed to address the requirements of the ESSA. While both programs collaborate together for program implementation, the requirement will be monitored within the program where the statute resides.

10. How should Title I, Part A and Title III, Part A collaborate within the Georgia's Systems of Continuous Improvement framework and completion of the district and school comprehensive needs assessment (CNA) and the district and school improvement plan?

As with all Federal programs, coordination for service delivery is important. LEA staff working with Title I, Part A and Title III, Part A should have consistent, on-going collaboration procedures in place for working within the Georgia's Systems of Continuous Improvement framework. This will help streamline offerings, maximize use of resources and assure compliance with all programs' expenditure rules.

RESOURCES

To download a template of the parent notice in English and 14 other languages, please visit the Family-School Partnership Program's Parents of ELs webpage at



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<http://www.gadoe.org/School-Improvement/Federal-Programs/Partnerships/Pages/Parents-of-English-Learners.aspx>.

For questions regarding how this parent notice will be reviewed during the GaDOE Cross-Functional Monitoring process, as described in Section 1112(e)(3)(A) of the ESSA, please contact your Family Engagement Specialist based on your geographic location. Their service area and contact information are available at <http://www.gadoe.org/School-Improvement/Federal-Programs/Partnerships/Pages/Contact-Us.aspx>.

For questions about using Title I funds for translations, interpretation, dissemination methods of the notice, and supplemental English language supports in Title I schoolwide schools, please contact your Title I Area Specialist. Contact information is available at <http://www.gadoe.org/School-Improvement/Federal-Programs/title-i/Pages/Disadvantaged-Children.aspx>.

For LEAs with questions regarding the use of their Title III allocation, please contact your Title III Regional Specialist. Contact information is available at <http://www.gadoe.org/School-Improvement/Federal-Programs/Pages/Title-III.aspx>.

For additional information, please visit the:

- [Title I, Part A Handbook](#)
- [Title III Resource Guide](#)
- [GaDOE Parents of English Learners Webpage](#)