

Title III, Part A Language Instruction for English Learners and Immigrant Youth Allowable Use of Funds

The purpose of Title III, Part A (Title III) is to improve the education of English learners (ELs) and immigrant children and youth (IY) by assisting students in learning English and meeting the challenging state academic standards. Broadly, local educational agencies (LEAs) can use Title III, Part A funds for items such as resources to support strong English learner (EL) instructional practices, teacher professional development, and EL family support and engagement. (ESSA, Title III, Part A § 3102)

Federal funds made available under Title III, Part A shall be used to supplement the level of federal, state, and local public funds that, in the absence of such availability, would have been expended for programs for limited English proficient children and immigrant children and youth (ESEA § 3115(g)). For more information on the supplement not supplant provision of Title III, see the [Title III Supplement Not Supplant Guidance](#).

Prior to utilizing Title III funds, each cost must be budgeted and deemed reasonable, appropriate, and necessary. (2 CFR § 403(a-c))

- **Budgeted:** Is the cost clearly documented within the budget of the Title III section of the Consolidated Funding Application (CFA) in ePlan?
- **Reasonable:** Would the cost withstand public scrutiny? Are the costs consistent with state and federal policies and procedures?
- **Appropriate:** Does the cost comply with federal program requirements, guidance and follow established policies, and procedures?
- **Necessary:** Is the cost essential to carry out the intent and purpose of the program?

It is important to note that only active ELs (Ls and Ws) and Immigrant students may be served under Title III. Students who have exited ESL services (T1, T2, T3, and T4) may not be served with Title III funds.¹ (ESSA, Title III, Part A § 3114(d))

Required Uses of Title III, Part A Funds²

LEAs **must** use Title III, Part A funds for three activities under ESEA § 3115(c)(1-3):

1. Providing **effective language instruction educational programs (LIEPs)** that meet the needs of ELs and demonstrate success in increasing English language proficiency and student academic achievement.

¹ The *L* English language background classification, is defined as first language is not English and qualifies for direct English as a second language (ESL) service. The *W* English language background classification is defined as an English learner who declined direct ESL services in order to receive ESL services in a regular classroom. The *T1* English language background classification, is defined as first transition year from ESL after exit; *T2* is defined as second transition year from ESL after exit; *T3* is defined as the third transition year from ESL after exit; and *T4* is defined as the fourth transition year from ESL after exit. For more information on EL and immigrant student coding, see the [FPO Data Manual](#).

² For more information on the allowable use of Title III, Part A funds see [Title III Non-Regulatory Guidance](#).

2. Providing **effective professional development** to classroom teachers (including teachers in classroom settings that are not the settings of LIEPs), principals and other school leaders, administrators, and other school or community-based organizational personnel, that is:
 - Designed to improve the instruction and assessment of ELs,
 - Designed to enhance the ability to understand and implement curricula, assessment practices and measures, and instructional strategies for ELs,
 - Effective in increasing children’s English language proficiency or substantially increasing the subject matter knowledge, teaching knowledge, and teaching skills of such teachers, and
 - Of sufficient intensity and duration (which shall not include activities such as 1-day or short-term workshops and conferences) to have a positive and lasting impact on the teachers’ performance in the classroom.
3. Providing and implementing **other effective activities and strategies** that enhance or supplement language instruction educational programs for ELs, which ***must*** include:
 - **parent, family, and community engagement activities**, and
 - ***may*** include strategies that serve to coordinate and align related programs.

Other Authorized Uses of Title III, Part A Funds

In addition to the required three activities above, LEAs may spend their Title III funds on other supplemental activities, including:

- Upgrading program objectives and effective instructional strategies;
- Improving the instructional program for ELs by identifying, acquiring, and upgrading supplemental curricula, instructional materials, educational software, and assessment procedures (not including LEA-wide adoption initiatives);
- Providing supplemental tutorials and academic or career and technical education, and intensified instruction to ELs, which may include supplemental materials in a language that the student can understand;
- Developing and implementing effective supplemental preschool, elementary school, or secondary school language instruction educational programs that are coordinated with other relevant programs and services;
- Improving the English language proficiency and academic achievement of ELs;
- Providing community participation programs, family literacy services, and parent and family outreach and training activities to ELs and their families to improve the English language skills of ELs, and to assist parents and families in helping their children to improve their academic achievement and becoming active participants in the education of their children;
- Improving the instruction of ELs, which may include ELs with a disability, by providing for the acquisition or development of supplemental educational technology or instructional materials; access to, and participation in, electronic networks for materials, training, and communication; and incorporation of these resources into curricula and programs (not including LEA-wide adoption initiatives);
- Offering supplemental early college high school or dual or concurrent enrollment programs or courses designed to help ELs achieve success in postsecondary education; and
- Carrying out other activities that are consistent with the purpose of Title III, Part A subgrants. [ESEA § 3115(d)(1-9)].

As with all Title III costs, the three required Title III EL activities—effective LIEPs, effective professional development, and effective parent, family, and community engagement activities, as well as the other authorized activities described above - must be supplemental to state and locally funded programming the LEA is delivering to meet its civil rights obligations to ELs. See [Title III Supplement Not Supplant Guidance](#) for more information.

The table below, which is not exhaustive, provides general guidance on what types of Title III expenses are allowable and unallowable within these larger categories. Funds may be utilized on eligible EL and immigrant students.

Table of Allowable and Unallowable Costs

Expenditure	Allowable Costs	Unallowable Costs
Administrator Salaries	<ul style="list-style-type: none"> Hire staff up to the maximum 2% permitted for administrative costs (inclusive of direct and indirect costs) 	<ul style="list-style-type: none"> Administrative costs above 2%
Instructional/ Professional Staff	<ul style="list-style-type: none"> Supplemental instructional coaches for ELs Teachers for extended day/extended year-only if the activity is Title III specific and supplemental to what is provided to all students Teachers for TIII supplemental parent ESL classes 	<ul style="list-style-type: none"> Core instruction teachers, including ESL teachers during the school day
Support Staff Salaries	<ul style="list-style-type: none"> Secretary/Bookkeeper for Title III grant work—only the portion of salary that is specific to the Title III program Paraprofessionals to assist ESL students in class ESL family, literacy, and parent outreach liaison 	<ul style="list-style-type: none"> Entire salary unless the individual's entire responsibility is Title III Screening students for English learner (EL) status Substitutes for staff to administer required EL screening or assessment
Stipends	<ul style="list-style-type: none"> ESL teacher collaboration to upgrade an already established ESL curriculum Stipends for teachers to attend professional development (PD) to benefit the language acquisition of ELs Tutors under the direction of an ESL licensed teacher Staff for summer/extended day programs 	<ul style="list-style-type: none"> Funding for LEA interpreters/ translators Funding to write ESL curriculum

Expenditure	Allowable Costs	Unallowable Costs
Contractual Services	<ul style="list-style-type: none"> • Consultants to improve best practices for the teaching of ELs • Consultants to provide training to educators to be culturally aware • Consultants for non-public school equitable participation 	<ul style="list-style-type: none"> • LEA-sponsored PD
Supplies and Materials	<ul style="list-style-type: none"> • Supplemental supplies to be used strictly for Title III sponsored professional development • Supplemental Title III meeting supplies such as chart paper, pens, binders, easels • Supplemental supplies and materials for ESL summer and extended day programs • Nutritional snacks for students during ESL summer and extended day programs • Supplemental reading texts for ESL classroom language enhancement • Supplemental technology equipment and electronic devices for the purpose of ESL instruction • Supplemental ESL-specific software • Supplemental bilingual textbooks and ancillary materials • Non-public school materials for ELs as agreed to through LEA consultation, such as leveled readers and initial assessment testing materials. Materials remain property of the LEA and must be labeled and inventoried. 	<ul style="list-style-type: none"> • Supplies to be used in the general education classroom or by students for core programs or instruction • Teacher evaluation system-related data systems • Items required under federal or state law: <ul style="list-style-type: none"> ◦ Classroom textbooks (non-bilingual) ◦ WIDA assessment materials ◦ Items needed for EL identification ◦ Items or program aspects associated with the creation and monitoring of required Individual Learning Plans (ILPs)
Assessment Materials	<ul style="list-style-type: none"> • Supplemental assessments for progress monitoring or benchmarking of ELs to determine interim growth (supplemental to what is provided for all students) 	<ul style="list-style-type: none"> • LEAs may not use Title III funds for purposes related to identification and reclassification of ELs • Assessment materials for the LEA

Expenditure	Allowable Costs	Unallowable Costs
Professional Development	<ul style="list-style-type: none"> • Effective ESL professional development for classroom teachers, principals, and other school leaders, administrators, and other school or community based organizational personnel • Professional development related to: <ul style="list-style-type: none"> ◦ ESL strategies and implementation of programs ◦ Identification and reclassification procedures ◦ Language acquisition theory and research • Supplemental training opportunities to enhance the ability to understand and implement ESL curricula, assessment practices, and measures, and instructional strategies • Supplemental printing/copying for ESL PD • NOTE: LEAs who receive Title III funds must provide professional development designed to improve the instruction and assessment of ELs (ESEA § 3115(c)(2)(A)) 	<ul style="list-style-type: none"> • Training or training materials associated with law or rule, such as WIDA assessment administration training
Travel (Conference & Course Registration)	<ul style="list-style-type: none"> • Conference registration for ESL educators to attend conferences to benefit the language acquisition of ELs • Expenses for transportation, per diem, and lodging if the costs are reasonable and necessary to participate in the conference • Out-of-State travel costs should be minimal, reasonable, and meet the intent and purpose of the program • Non-public school allocation for ESL PD: this must be consistent with TIII regulations found in Title VIII 	<ul style="list-style-type: none"> • Meals (aside from per diem), unless included in conference registration fee • Meals for school/LEA PD meetings • Travel costs for officials such as the superintendent, or board members may not be funded with Title III

Expenditure	Allowable Costs	Unallowable Costs
<p>English Learner Family Support & Engagement</p>	<ul style="list-style-type: none"> • Translation or interpretation specific to the Title III program only, including explanations of: <ul style="list-style-type: none"> ○ Anticipated length of service ○ Exit from ESL services • Supplemental parent and family engagement for EL families, including: <ul style="list-style-type: none"> ○ ESL instruction for parents ○ Training on parent engagement and educational involvement ○ Supplemental texts and materials to support student learning at home ○ Supplemental lending technology to assist with communication ○ Translation or interpretation for parent and family engagement specific to the Title III program • To increase participation or attendance to meet program objects during Title III engagement events, the following expenses are allowed: <ul style="list-style-type: none"> ○ Light refreshments ○ Translation and Interpreter services ○ Transportation • Nutritional snacks for children in child care while parents are participating in grant activities • NOTE: LEAs who receive Title III funds must provide and implement parent, family, and community engagement activities that enhance or supplement language instruction educational programs for ELs [ESEA § 3115(c)(3)] 	<ul style="list-style-type: none"> • Translation or interpretation required under other laws: <ul style="list-style-type: none"> ○ IEP-related or core education information ○ General school information ○ Testing/assessment procedures ○ Title I, Part A parent and family engagement requirements ○ Information on why ESL services are being provided ○ Predicted outcomes for graduation ○ Translation or interpretation required under Office of Civil Right statutes ○ Non-discriminatory procedures ○ Essential school information • Gift cards • Door prizes
<p>Other Costs</p>	<ul style="list-style-type: none"> • Supplemental memberships/subscriptions for ESL PD • Supplemental, experiential field trips for ELs in the extended day program • Supplemental transportation for ELs for summer/extended day program 	
<p>Indirect Costs</p>	<ul style="list-style-type: none"> • LEA indirect cost rates (indirect costs are part of 2% administrative cap) 	<ul style="list-style-type: none"> • Indirect rate greater than the percentage assigned to LEA