

Quality Plans and Effective Articulation and Coordination Among State & Federal Programs

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Outcomes for Participants

- Learn the elements of an ESSA Title III quality plan
- Understand the intent and purpose of state and all supplemental federal programs.
- Become familiar with rules for coordinating federal funds.
- Acquire creative and effective ways for coordinating local, state and federal funds.
- Apply new knowledge

ESSA & Title III Local Plans

“(1) describe the effective programs and activities, including LIEP, proposed to be developed, implemented, and administered to help English learners ***increase their English language proficiency and meet the challenging State academic standards;***

- “(2) describe how the LEA will ensure that elementary schools and secondary schools receiving funds under this subpart assist English learners in—
- “(A) achieving English proficiency based on the State’s English language proficiency assessment under section 1111(b)(2)(G), consistent with the **State’s long-term goals**, as described in section 1111(c)(4)(A)(ii); and
- “(B) meeting the challenging State academic standards;
- “(3) describe how the eligible entity will promote **parent, family, and community engagement** in the education of English learners;

ESSA & Title III Local Plans

The local plan (4) contain assurances that each LEA—

- “(A) is complying with section 1112(e) prior to, and throughout, each school year as of the date of application;
- “(B) is not in violation of any State law, including State constitutional law, regarding the education of English learners, consistent with sections 3125 and 3126;
- “(C) has **consulted with teachers, researchers, parents & family members, school administrators, community members, public or private entities, and institutions of higher education, in developing and implementing such plan;** and
- “(D) will **coordinate activities and share relevant data under the plan with local Head Start and Early Head Start agencies, including migrant and seasonal Head Start agencies, and other early childhood education providers.**

ESSA and Quality Title III Plans

Title III Local Plan must have:

- Measurable objectives, evidence-based strategies.
- Proposed activities within the consolidated application must support the strategies and align well with the objectives
- The local plan must involve all stakeholders including parents, teachers, principals and community organizations
- The plan may be part of the District and School improvement plans to ensure better coordination and ELs' access to all state and federal funds they qualify for
- For a Consortium, the plan follows similar requirements and necessitates collaboration among all members
- The plan must be reviewed annually & adjusted as guided by data derived from student academic & language achievement results.

Coordination under ESSA

- **§ 3114 (3)(B) of Title III states:** “..provide and implement effective activities and strategies that enhance or supplement language instruction educational programs for English learners, which may include ***strategies that coordinate and align related programs.***
- Under Title III **§ 3113 (4)**, LEAs are to “ describe how the agency will ***coordinate its programs*** and activities with other programs and activities under this Act and other Acts.
- **§ 1111 of Title I Part A** addresses state plans & requires that states describe how to ***meet the needs*** of disadvantaged students, and ***English learners.***

Coordination Under ESSA

- § 1112(a)(1)(B): requires that district Title I programs coordinate with other programs
- § 1112(c)(4): requires that districts provide an assurance that they will “*coordinate and integrate services at the local educational agency or individual school level, such as services for English learners . . .*”
- § Title I Part C, Section 1304 (b)(1) (B) requires states to conduct joint planning among local, State, and Federal educational programs serving migrant children, including language instruction educational programs under part **A of Title III**;

Program Intent and Purpose

- Title I, Part A: Provide all children significant opportunity to receive a fair, equitable, and high-quality education, and to close educational achievement gaps **ESSA § 1111**
- Title III, Part A: help ensure that ELs, including immigrant children and youth, attain English proficiency and develop high levels of academic achievement in English and academic subjects; provide effective LIEP and develop capacity of personnel to provide effective LIEP, promote parent/family & community engagement and outreach **ESSA § 3001**

Program Intent and Purpose

- **Title II, Part A: ESSA § 2001(1-4)** Increase student achievement; improve quality & effectiveness of teachers, principals, & other school leaders; **increase number of teachers, principals, and other school leaders who are effective in improving student achievement**; provide **low-income and minority students greater access to effective teachers, principals & other school leaders.**
- **Section 31a:** Provide instructional and direct non- instructional support services for pupils to achieve **reading proficiency by the end of third grade and college and career readiness in 11th grade.**
- **ESSA 1301 (a) (1-5)** supporting high-quality and comprehensive educational programs and services that address the unique educational needs; ensure that migratory children who move among the States are not penalized by disparities among the States in curriculum, graduation requirements, and challenging State academic standards; ensure they meet the challenging State

Other Federal Laws

- **Title VI** of the Civil Rights Act of 1964 prohibits discrimination on the basis of race, color, and national origin.
- Under Title VI, “No person in the United States shall, on the ground of race, color, or national origin, be excluded from participation in, **be denied the benefits of**, or be otherwise subjected to discrimination under any program to which this part applies.”
- OCR requires providing an Alternative Language Program for ELs to ensure **equitable access to the state content standards.**

Criteria For Using Federal Funds

Reasonable- A cost is reasonable if, in its nature and amount, it does not exceed that which would be incurred by a prudent person under the circumstances prevailing at the time the decision was made to incur the cost.

Allocable- A cost is allocable to a cost objective if the goods or services involved are chargeable or assignable to the cost objective in accordance with the relative benefits received.

Allowable- A cost is allowable if it is necessary and reasonable for proper and efficient performance of the award and allocable to the award. **(OMB Circular A-87)**

Supplement, not Supplant

Title III Part A; Title I, Part A; Title I, Part C as well as Title II, Part A have supplement, not supplant requirements:

- Title I, Part A: in both schoolwide and targeted assistance schools, funds must supplement, and not supplant non-Federal funds § **1114(2)(B)***
- Title III, Part A: funds must supplement, and not supplant services provided in the prior year or other Federal, State, and local funds § **3115 (g)**
- Title I, Part C: § 1306 (a)(B) (iii) the State plan is not to supplant State efforts or administrative funding.

****A fact sheet issued Sep 1, 2016 provides three options for demonstrating SNS***

Layers of Education & Supports for ELs

4th – Title III supplemental services beyond the 1st, 2nd & 3rd layers: must include additional direct instruction that helps close the achievement gap, professional development, and parent outreach

3rd – Supplemental support from Title I, Part A and 31a ‘at risk’ program

2nd – OCR mandated alternative language program that provides to students English language instruction and meaningful access to the core curriculum (1st layer)

1st – Basic, local board-adopted curriculum that all students receive.

**LEA General Fund
Responsibility**

Intent and Purpose: Professional Development

- Title I, Part A: Focused on proficiency and basic core academic areas
- Aligned to the continuous improvement plan
- Only for staff who work closely with targeted assistance students in a targeted building
- Can fund all staff in schoolwide as long as it is aligned with identified need in that building as referenced in the continuous improvement plan
- Can fund everyone in ***focus and priority*** schools that are currently applying to become schoolwide.

Intent and Purpose: Professional Development

Title III Sec. 3111

- Aligned with the Title III Plan included within the district's continuous improvement plan (DIP, SBDIP).
- Focused on language and content instruction
- Provided **Only** for teachers, paraprofessionals, parents, community members of ELs, personnel & principals.
- Is systemic, systematic and job-embedded
- The plan is evaluated annually following the Title III indicators; If in coordination with other initiatives, use MDE's Program Evaluation Tool (PET).

Title I, Part C

- Aligned with the plan (DIP, SBDIP)
- Provided **only** for staff of migrant students
- Evaluated annually following the indicators

Intent and Purpose: Professional Development

Title II, Part A:

- Aligned with the DIP/SBDIP.
- Focus on teacher, paraprofessional and administrators' quality & leadership.
- Can fund everyone in both targeted assistance, schoolwide schools and non-Title I schools.

31a:

- Aligned to the DIP/SBDIP/SIP
- Ensures that 3rd graders are on grade level in reading; that 11th graders are career & college ready
- Supports MTSS – especially in grades K-3
- Can fund all staff

Guiding Principles: Title I, Part A; Title III, Title I, Part C; Section 31a and Section 41

Hired staff:

- **Must be supplemental to teachers of record***
- Must be supervised (If paraprofessionals at all times)
- Must be highly qualified (endorsed if for ELs) receiving ongoing research-based staff development.
- Must work with identified eligible students.
- **May not be assigned any administrative roles unless the position includes split responsibilities.**

Intent & Purpose: Parent Involvement

Title I, Part A ESSA Section 1116- Identify the strategy the local educational agency will use to implement effective parent and family engagement:

- Parent involvement policy & parent involvement plan
- Evaluate the plan annually
- Include parents in the development, revision implementation and evaluation of the plan
- Parent involvement activities are delivered in a language parents understand
- Develop & review a parent-school compact outlining each stakeholder's responsibilities to help students achieve.

ESSA Title I, Part A

- Parent notification for identification for and placement in an ESL program is **required under Title I, Part A § 1111(e)(3)(A)** for districts that use Title I, Part A or Title III to serve ELs
- Parent outreach emphasizes meetings with parents **more strongly than before** and even mentions “*regular meetings*” (Title I § **1111(e)(3)(C)**)

Intent & Purpose: Parent Involvement: Title III & Title I, Part C

- Focuses on parent, family & community engagement
- Parent involvement plan is guided by parental input and active participation
- Supplemental to, and well coordinated with, Title I Part A policy and plan
- Aligned to students' academic objectives
- Activities for parent, family and community engagement are delivered in a language parents can understand
- Parent engagement plan is evaluated annually
- No parent engagement rules for Title II, Part A.

Administrative & Indirect Costs

- Administrative costs are associated with overall project management and administration and are not directly related to the provision of services or otherwise allocable to program cost objectives/categories.
- Indirect costs represent the expenses of doing business that are not readily identified with a particular grant, but are necessary for the general operation of the organization.
- Common administrative cost function codes are: 226,283,231-single audit, 261 building operational services, 281 central office program evaluation, and indirect cost.

Administrative cost

- Title III: LEAs have a limit of 2% of the Title III subgrant for administration. (**Section 3115(b)**). The 2% administrative cap includes both administrative costs + indirect costs.
- Title I, Part A: LEAs have a limit of 10% for administration including indirect cost. (2% when ESSA is in effect)
- Title II, Part A: administrative cost may not exceed 5%
- Title I, Part C: administrative cost may not exceed 15%

Steps for Coordinating Spending Federal \$\$\$

1. Prioritize and identify the **comprehensive initiative** the school wants to implement that will have a positive **impact on student achievement**.
2. Identify the **component costs of the initiative**. Determine which federal program is the best fit for funding based on its purpose and eligibility requirements.
3. Determine if **necessary, reasonable, allowable** - https://www.whitehouse.gov/omb/circulars_a087_2004#43
4. Ensure that the cost is **consistent with** the LEA's DIP/SIP/SBDIP **and** the consolidated application.

Let's Discuss!

Examples of well-coordinated initiatives



Example 1 : Intensive professional development

- Title I, Part A: Professional development on appropriate instructional strategies for struggling readers, including reasonable related costs (stipends and substitute teachers).
- Title III, Part A: Supplemental professional development to EL staff, and other school and community-based organizations' personnel on second language acquisition strategies in support of the reading strategies (*e.g. how to write language and content objectives aligned with WIDA and MI's content standards*).

Example 1 (cont'd) : Intensive professional development.

- Title II, Part A: Reading teachers modeling best practices in classrooms.
- Title I, Part C: Professional development on strategies for removing barriers to learning /culture-specific competencies.
- 31a State/local funds: Professional development books on reading strategies for struggling readers to support this initiative.

Example 2: Instructional coaches to provide job-embedded professional development

- Title I, Part A: Hiring instructional coaches to assist teachers in delivering improved classroom instruction across content areas (can be ESL endorsed)
- Title II, Part A: Professional development on improving student behavior; identifying early and appropriate interventions to help students with special needs.
- Training on how to use data and assessments to improve classroom practices and student learning.
- Title III, Part A : Hiring ESL/bilingual coaches to train teachers on teaching oral language and language development strategies to English learners.

Example 3: Aligning instruction across grades that is responsive to student needs

- Title I, Part A: Hiring data experts to coach staff on how to read data, interpret results, identify gaps in achievement and determine interventions (schoolwide). In targeted assistance, only school personnel working closely with targeted assistance students can participate. Can include all staff in ***focus and priority*** schools
- Title II, Part A: Professional development (learn how to) involving collaborative groups of teachers & admin. on how to use data and assessments to improve classroom practices and student learning. Entire staff can participate SW or TA including non-Title I staff.
- Title III: Vertical and horizontal alignment of supplemental curricula for English language learners designed to improve English proficiency and academic achievement.

Example 4: Improve Parent/Family Engagement

- **Title I, Part A** – A districtwide bilingual parent educator (teacher position) to ensure systemic planning and delivery of parent engagement plan(s).
- **Title I, Part A** – School level parent liaisons in a schoolwide school to support family literacy, parent discussions and education. In a TA-focus on parents of TA students
- **Title III LEP or Immigrant** – ESL teacher to provide ESL courses to parents of English learners in partnership with Adult ESL/ABE
- **Section 31a**- Instructional materials to send home with eligible/ identified students for reading improvement.
- **Title I, Part C** – Bilingual parent liaisons for migrant students to assist with community outreach for migrant families.

Example 5: School Culture and Climate

Title I, Part A:

- Meeting time to identify Culture and Climate as goal areas
- Time to collaborate with stakeholders in identifying concern specifics (surveys, discussions)
- Review research on the area thru the School Improvement Team
- Identify supports from the National School Climate Center
- Determine how to implement the desired culture and climate shifts.
- Conduct family engagement opportunities and trainings
- Provide relevant field trips and assemblies
- Obtain supplementary books, magazines with cultural sensitivity
- Evaluate the implemented initiative(s)

Example 5: School Culture and Climate (cont'd)

Title II, Part A:

- Professional development on climate and culture (key speaker(s), book studies)
- Relevant workshops and peer learning experiences
- Teacher, school leader recruitment to address culture concerns
- Evaluate the trainings and decisions to hire targeted staff

Title III:

- Hire supplementary teachers and staff with cultural sensitivities/competence
- Conduct parent, family & community workshops and trainings
- Obtain bilingual relevant software to support individual learning
- Engage students in relevant field trips and assemblies
- Evaluate the implemented initiative(s) in coordination with Title I Part A and Title II, Part A.

Example 6: Extended Learning

- **Title I, Part A** – ELA Interventionists teaching struggling EL readers
- **Title III (EL)** – Certified & endorsed EL teachers working with struggling EL readers on language development/scaffolding content, over and above the intervention provided by the Title I, Part A Interventionists
- Title II, Part A- Cover cost for professional development to all summer school teachers on critical thinking/metacognitive strategies across the curriculum.

Examples of Coordinating Funds

AT YOUR TABLE

Draft one example of a well-coordinated initiative and how it can be funded by several funding sources (both state and federal funds).

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