

***Coordinating Services Among Title I, III and Early
Childhood to Better Serve English Learners
From PreK-12***

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Outcomes for Participants

- Learn the elements of an ESSA Title III quality plan
- Understand the intent and purpose of 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 Language Instruction Educational Program (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);

ESSA & Title III Local Plans

- 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;

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

- “(A) is complying with section 1112(e) prior to, and throughout, each school year;
- “(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;

ESSA & Title III Local Plans

“(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.

Quality Title III Plans

- The local plan must be guided by a comprehensive needs assessment and involve all stakeholders
- Must have measurable objectives, evidence-based strategies. Proposed activities must support the strategies and align well with the objectives
- Plan may be part of the LEA's school improvement plan to ensure better coordination and ELs' access to all state and federal funds
- 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;

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. Ensure that the cost is **consistent with** the LEA's plan **and** the consolidated application.

Steps for Coordinating Spending Federal \$\$\$

4. Determine if proposed activity is **necessary, reasonable and allowable**

<http://www.whitehouse.gov/omb/circulars/a087/2004#43>

5. Maintain intent and purpose of each federal program, and the supplement not supplant requirements.

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)**

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 I Part C: 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 academic standards; help migratory children overcome educational disruption, cultural & language barriers, social isolation, various health-related problems; help them benefit from State and local systemic reforms.

Program Intent and Purpose

Title II, Part A: ESSA §2001(1-4) Increase student achievement; improve quality and effectiveness of teachers, principals, and other school leaders; increase number of teachers, principals, & other school leaders who are effective in improving student achievement; and provide low-income and minority students greater to effective teachers, principals & other school leaders.

Supplement, not Supplant Requirements

Title III Part A; Title I, Part A; Title I, Part C 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

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.

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

Guiding Principles: Title I, Part A & C ; Title III

Hired staff:

- Must be supplemental to teachers of record
- Must be supervised (If paraprofessionals at all times)
- Must meet SEA's certification/licensing requirements (endorsed if for ELs) and be engaged in an ongoing research-based staff development.
- Must work with identified eligible students.
- May not be assigned any administrative roles unless the position includes split responsibilities.

ESSA and Early Childhood

- An LEA may use Title I funds to implement a preschool program throughout the district to benefit all preschool students in the district if all the schools in the district are operating schoolwide programs.
- A district may serve Prek children who reside in specific Title I school attendance areas served by some or all of its Title I schools if a district does not have sufficient Title I funds to operate a preschool program for the district as a whole.
- Title I Part A funds can be used to support evidence-based early childhood home visiting programs, including use of the 1 % set aside for family engagement.

Source: EducationalCouncil; ¹Parents as Teachers as distributed through CCSSO.

ESSA and Early Childhood- Coordination

- An LEA may use Title I, Part A funds to improve the quality or extend the day or number of days of state preschool, Head Start, or CBO early learning program for eligible children. Funds may be used to provide preschool services for Title I, Part A eligible children who:
 - Are not eligible for Head Start services based on income requirements;
 - Are eligible for Head Start but not served in a Head Start center due to unmet need;

Coordination with Early Childhood, Cont'd

- Are enrolled in a state preschool, Head Start, child care, or CBO early learning program and are in need of additional services; or
- Would benefit from home visiting because they are most at risk of failing to meet the state's challenging academic standards.

Source: EducationalCouncil; Parents as Teachers as distributed through CCSSO.

Coordination with Early Childhood

- In MI preschoolers (4 year olds) are identified for EL services (optional) based on the home language survey and developmentally appropriate screeners.
- Preschoolers are screened on the ELP assessment once they transition to Kindergarten
- LEA affiliated preschool programs are supported by Title III over and above early childhood funding
- Title III funded professional learning activities include preschool teachers and other staff members with focus on second language development

What's allowable under ESSA?

- SEAs must coordinate with other programs that provide services to children, including Head Start and IDEA.
- SEA must provide assistance to LEAs choosing to use Title I funds to support early childhood education programs.
- SEA must include on a state report card the number and percentage of children enrolled in preschool programs.
- SEA can develop state plans that address the comprehensive needs of all young children.
- SEA can integrate early education data with state longitudinal data systems.
- SEA can implement strategies, including high-quality early learning, to improve struggling schools.
- SEA can align state early learning guidelines and K-12 standards. Source: EducationalCouncil

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.

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.

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
- 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: 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-** Cost for professional development to all summer school teachers on deeper learning strategies across the curriculum.

Example 6: Early Literacy

- Hire a literacy coach to support job-embedded professional learning focused on PreK-3 (Title II)
- Hire an ESL coach to support second language development strategies applied by teachers of ELs (Title III)
- Invest in a “book study” for all staff (local funds/ Title II)
- Acquire classroom libraries of leveled books (Title I in SW)
- Pay substitutes for MTSS/PLC discussions (local funds)

Examples of Coordinating Funds

With a Partner

Draft one example of a well-coordinated initiative and how it can be funded by several funding sources

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