



ARIZONA DEPARTMENT OF EDUCATION

Title III Consortium – Overview and Guidance Document

Background

Under Section 3114(b) of Every Student Succeeds Act (ESSA), a State educational agency shall not award a sub-grant from an allocation made under subsection (a) if the amount of such sub-grant is less than \$10,000. Therefore, LEAs who would not otherwise qualify for an individual sub-grant because they do not qualify for an award of at least \$10,000 may submit a joint application with one or more LEAs to qualify.

What is a Consortium?

A consortium is a collective group of LEAs who are eligible to receive Title III funds but are below the \$10,000 threshold for an individual application. One LEA or County Superintendent's Office must agree to serve as the Lead LEA/Fiscal Agent of the consortium.

Who may join a Consortium?

Any LEA may choose to join a consortium, regardless of allocation amount, however, LEAs with an allocation below the required \$10,000 threshold **MUST** join a consortium to receive funds. The combined Title III original allocations of all members must meet or exceed \$10,000. Carryover amounts are not included when determining the required threshold.

What are the benefits of joining a Consortium?

LEAs can access Title III funds to provide supplemental support for English learners. Title III-funded support **must** include:

1. Programs that increase English language proficiency and student achievement in core content classes

2. Effective professional development opportunities for classroom teachers, principals, administrators, and other school personnel designed to improve instruction and assessment of ELs
3. Effective strategies and activities for parents and family members of ELs that enhance or supplement language instruction educational programs for English learners

How is a Consortium created?

An individual LEA or a County Agent may form a consortium.

- An LEA interested in forming a consortium can reference the Title III Allocations List located on the OELAS website and contact other LEAs to determine interest. The combined Title III allocations of all participating LEAs must meet or exceed \$10,000.
- The LEA agreeing to serve as the Lead LEA/Fiscal Agent must notify OELAS of its intent to form a consortium and provide a list of participating consortium members.
- The Lead LEA/Fiscal Agent must complete the *Consortia – Lead Agent Funding Forms*. This document can be found in the Related Documents section of the Title III Consortium application or in the LEA Document Library in the Grants Management Enterprise system (GME).
- To acknowledge its consortium participation, each LEA member must complete the *Consortia - Participating LEA Member - Certification and Assurances* form found in the Related Documents section of the Title III Consortium application or in the LEA Document Library in the Grants Management Enterprise system (GME).
- All LEAs must describe their EL/Title III program by completing *the Title III LEA Plan Requirements - Consortium Members* forms found in the Related Documents section of the Title III Consortium application or in the LEA Document Library in the Grants Management Enterprise system (GME).
- An Intergovernmental Agreement (IGA) is recommended for Title III consortium members. The IGA should clearly outline the handling of administrative duties, management of funds, and filing grant reports for all members.

What are the options for Title III Consortium grants?

LEAs participating in a Title III Consortium have options for how the consortium will allocate and expend funds. Each of the available options are listed below and **MUST** be determined at the time of consortium formation and fully outlined in the required Memorandum of Understanding (MOU).

Option #1:

- Each participating LEA member will create a unique plan for spending the full amount of its individual Title III budget (current year allocation and carryover, if applicable).
- The Lead LEA/Fiscal Agent will keep all separate budget plans on file and disseminate the appropriate funds to each member. The grant application will separately identify each LEA member's budget.

Option #2:

- Consortium members collaborate to design one comprehensive plan which combines the allocations of all members AND benefits all members of the consortium.
- This option must be clearly outlined in the Memorandum of Understanding, or alternate agreement, created by the Lead LEA/Fiscal Agent AND agreed upon by all members. The grant application will also identify how funds have been combined for a common purpose which benefits all consortium members.

P.D. Example: *The allocations of all members will be combined and used to pay for the services of a consultant who will provide professional development to all members of the consortium. All members equally share the cost and receive benefit from these services.*

Option #3:

- The consortium will use a combination of Option #1 and Option #2 by collaborating with some LEA members and disseminating funds separately for other LEA members.
- Budget items which are a collaborative request must be clearly detailed as such in the grant application.

What are the duties and responsibilities of the Lead/LEA Fiscal agent?

Duty:

The Lead LEA/Fiscal Agent assumes the responsibility of completing and submitting the Title III application, reimbursement requests, and completion report on behalf of the consortium.

Responsibilities:

- Submit a Memorandum of Understanding (MOU), or alternate agreement, that outlines how the consortium will meet all Title III grant requirements. This MOU, or

alternative arrangement, must be signed by the Superintendent/Charter Representative who agree to be members of the consortium. A sample MOU is provided as part of the *Consortia – Lead Agent Funding Forms* document in the Title III Consortium application.

- Distribute the required *Consortia- Participating LEA Member – Certification and Assurances* documents to each participating LEA member.
- Distribute the required *Title III LEA Plan Requirements- Consortium Members* form to all participating members.
- Abide by and communicate all grant due dates and deadlines.
- Obtain information from LEA members necessary for submission of the original application, application revisions, reimbursement requests, and completion reports.
- Ensure all sections of the Funding Application have been completed.
- Upload all required documents to the consortium application.
- Complete and submit the Title III application, all reimbursement requests, and the completion report on behalf of the consortium.

Duty:

The Lead LEA/Fiscal Agent is the point of contact with the Arizona Department of Education for all communication regarding the Title III application.

Responsibilities:

- Seek technical assistance as needed from ADE grant/program specialists for the participating consortium LEA members.
- Communicate with LEA members any changes pertaining to the Funding Application.

Duty:

The Lead LEA/Fiscal Agent is responsible for ensuring that LEAs in the consortium fulfill their fiscal and programmatic responsibilities under Title III.

Responsibilities:

- Verify each LEA member’s budget aligns with their current year allocation and any incoming carryover, if applicable.
- Ensure the professional development requirement has been included in each LEA member’s budget.

- Ensure the parent/family engagement requirement has been included in each LEA member's budget.
- Ensure funding requests increase the English proficiency of English learners and immigrant children and youth by providing effective language instruction educational programs (LIEPs)
- Ensure members have not exceeded the allowable 2% for direct administrative expenses.
- Confirm members have not violated the supplement, not supplant requirement.

What are the Duties and responsibilities of LEA members?

Duty:

LEA members must comply with all Title III grant requirements.

Responsibilities:

- Read and acknowledge the required Title III Program Assurances included in the *Consortia - Participating LEA Member – Certification and Assurances* document provided by the Lead LEA/Fiscal Agent.
- Consult with the LEA's stakeholder team to determine English Learner program needs and budget requests.
- Complete the *Title III LEA Plan Requirements - Consortium Members* document describing the LEA's EL program and providing details of the LEA's Title III program.
- Ensure all requested items in the Title III budget are supplemental (above and beyond) to what is provided for non-EL students and in addition to the LEA's instructional program for ELs.
- Confirm professional development for EL staff has been included in the Title III budget.
- Confirm parent/family engagement component has been included in the Title III budget.
- Confirm funding requests increase the English proficiency of English learners and immigrant children and youth by providing effective language instruction educational programs (LIEPs)
- Verify supplanting does not exist.
 - Supplanting exists if the LEA uses Title III funds to provide programs and/or services that the LEA is required to make available under State or local laws, or other Federal laws.
 - Supplanting exists if the LEA uses Title III funds to provide services that the LEA provided in the prior year with State, local, or other Federal funds.

- Supplanting exists if an LEA uses Title III funds to meet its civil rights obligations to EL students.
- Ensure budget requests do not exceed the total of the current year's allocation and any incoming carryover, if applicable.
- Ensure direct administrative expenses of the grant do not exceed 2% of the original allocation amount.
- Notify the Lead LEA/Fiscal Agent when an application revision is needed for fiscal and/or programmatic changes to an approved budget.

What is the time commitment when an LEA joins a Title III Consortium?

- Title III consortium agreements are one-year commitments aligned with the fiscal year.
- Members may reconsider participation annually.
- It is the responsibility of the Lead/LEA Fiscal agent and the participating members to revisit the terms annually.

How do members leave the Title III Consortium?

- Consortium members must complete all annual obligations once an agreement has been made between the LEA and the Lead/LEA Fiscal agent.
- An LEA that wishes to leave a consortium after the fiscal year is complete must provide written notification to the consortium Lead/LEA Fiscal agent and to the Arizona Department of Education.
- Any unspent Title III funds by the LEA remain with the consortium's Lead/LEA Fiscal agent.

What happens if a Consortium member is not completing its responsibilities?

- The Lead/LEA Fiscal agent must document if an LEA is unresponsive or does not meet the obligations/terms of the Title III Consortium.
- The Lead/LEA Fiscal agent must reach out to the Arizona Department of Education if the issue/unresponsiveness persists.
- The Lead/LEA Fiscal agent must provide written documentation to the Arizona Department of Education if a request is made to have a consortium member removed.

What is the Title III Consortium timeline?

Month	Task	Due Date
February	ADE survey sent out to existing Consortium Lead/LEA Fiscal agents to determine if any changes are needed for the new fiscal year	Last day of February
March	ADE posts preliminary allocations on the OELAS website	TBD
April	LEAs notify ADE of any new Title III Consortium applications	April 30
May	Suggested month to submit all funding applications	
July	Target date for director approval of the current year funding application	July 1
September	Current fiscal year applications close in GME; all application revisions need to be director approved	September 30
December	Current fiscal year completion reports need to be approved by Grants Management	December 30