

FORMING A TITLE III CONSORTIUM – Guidance Document

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 a 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. The Office of English Language Acquisition Services (OELAS) provides the following guidance on consortia.

WHAT IS A CONSORTIUM?

A consortium is a collective group of LEAs who are eligible to receive Title III funds, but are below the 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.

WHAT ARE THE BENEFITS OF A CONSORTIUM?

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

WHO MAY JOIN A CONSORTIUM?

Any LEA may choose to join a consortium, regardless of allocation amount; however, an LEA with an allocation below the required \$10,000 threshold **MUST** join a consortium in order 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.

HOW IS A CONSORTIUM FORMED?

- 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 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.
- The Lead LEA/Fiscal Agent must notify OELAS of its participating members. The Lead LEA/Fiscal Agent must complete the **CONSORTIA – Lead Agent Funding Forms**. These documents can be found in the Required Documents section of the Title III Consortium application as well as in the Document Library in the Grants Management Enterprise system (GME).
- To acknowledge its consortium participation, each LEA member must complete the packet **CONSORTIA - Participating LEA Member – Certification and Assurances** found in the Required Documents section of the Title III Consortium application or in the Document Library in the Grants Management Enterprise system (GME).

WHAT ARE THE OPTIONS FOR TITLE III CONSORTIUM GRANTS?

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:

- Participating LEAs will collaborate to design one 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.
Example: The allocations of all members will be combined and used to pay for the services of a consultant who will provide professional development, coaching, parent trainings, etc. to all members of the consortium.

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.

Note: Regardless of consortium grant option, a breakdown must be provided for any items included in the grant application in which multiple LEA members are contributing to one specific expense.

Examples: Indirect Costs, administrative fees paid to the Lead LEA/Fiscal Agent

ROLES AND RESPONSIBILITIES OF THE LEAD LEA/FISCAL AGENT

Role: 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.

Responsibility: Distribute the required *CONSORTIA - Participating LEA Member – Certification and Assurances* documents to each participating LEA member.

Responsibility: 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 superintendents of districts/charter representatives agreeing to be members of the consortium. A sample *MOU* is provided as part of the *CONSORTIA – Lead Agent Funding Forms* document packet in the Title III Consortium application.

Responsibility: Abide by and communicate all grant dues dates and deadlines.

Responsibility: Obtain any and all information from LEA members necessary for submission of the original application, application revisions, reimbursement requests, and completion reports.

Responsibility: Ensure all sections of the funding application have been completed, including the Program Details page and any Related Documents, if applicable.

Responsibility: Upload all required documents to the consortium application.

Role: The Lead LEA/Fiscal Agent is the point of contact with OELAS for all communication regarding the Title III application.

Responsibility: Seek technical assistance as needed from OELAS grant specialists for itself and the LEAs participating in the consortium.

Responsibility: Communicate to LEA members all changes regarding the funding application and Integrated Action Plan (IAP) as requested in the History Log of the application by grant specialists.

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

Responsibility: Verify each LEA member’s budget aligns with their current year allocation and any incoming carryover, if applicable.

Responsibility: Ensure the professional development requirement has been included in each LEA member’s budget.

Responsibility: Ensure the parent/family engagement requirement has been included in each LEA member’s budget.

Responsibility: Ensure members have not exceeded the allowable 2% for direct administrative expenses.

Responsibility: Confirm members have not violated the supplement, not supplant requirement.

ROLES AND RESPONSIBILITIES OF THE LEA MEMBERS

Role: LEA members must comply with all Title III grant requirements.

Responsibility: Read and acknowledge the required *Title III Program Assurances* included in the *CONSORTIA - Participating LEA Member – Certification and Assurances* document packet provided by the Lead LEA/Fiscal Agent.

Role: LEA members must create the required Integrated Action Plan (IAP) and a budget designed to meet the specific needs of the LEA’s EL program.

Responsibility: Provide full details of the LEA’s Title III program and any other EL support in the Integrated Action Plan (IAP).

Responsibility: Ensure all requested items in the IAP and the 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.

Responsibility: Confirm professional development for EL staff has been included in the IAP and the Title III budget.

Responsibility: Confirm parent/family engagement component has been included in the IAP and the Title III budget.

Responsibility: Verify supplanting does not exist.

1. Supplanting exists if an 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.

2. Supplanting exists if an LEA uses Title III funds to provide services that the LEA provided in the prior year with State, local, or other Federal funds.

3. Supplanting exists if an LEA uses Title III funds to meet its civil rights obligations to EL students.

Responsibility: Ensure budget requests do not exceed the total of the current year allocation and any incoming carryover, if applicable.

Responsibility: Ensure direct administrative expenses of the grant do not exceed 2% of the original allocation amount.

Responsibility: Notify the Lead LEA/Fiscal Agent to submit an application revision for each fiscal and/or programmatic change to an approved budget.


Responsibility: Provide a copy of the completed IAP with your budget requests to the Lead LEA/Fiscal Agent.

Role: LEA members must create effective narratives in the Integrated Action Plan in ALEAT which fully describe all Title III-funded programs and services.






Responsibility: Identify all Title III-funded programs and services with the Title III tag.

Responsibility: Identify non-Title III-funded programs and services which benefit ELs with the EL tag.




NAVIGATING THE TITLE III APPLICATION IN GRANTS MANAGEMENT ENTERPRISE (GME) SYSTEM

Prerequisites for Lead LEA/Fiscal Agent		Title III Program Area Action
Obtain user access in ADEConnect to Grants Management Enterprise (GME) system. Funding applications live in GME.		N/A
Notify OELAS Title III Fiscal Specialist of participating consortium members. OELAS may require GME and grant application training modules to lead agents needing extra support.		Verify current year allocations and incoming carryover amounts. Contact Grants Management to build funding application.




Prerequisite for LEA Members		Title III Program Area Action
Obtain user access in Common Logon to ALEAT. Integrated Action Plans live in ALEAT.		N/A

Lead LEA/Fiscal Agent Tasks for Application Submission		Title III Program Area Action
Once the funding application is open in GME, navigate to the Related Documents section of the funding application. 1. Download and complete required CONSORTIA – Lead Agent Funding Forms documents. 2. Download and distribute required CONSORTIA - Participating LEA Member – Certification and Assurances documents to each participating consortium member. 3. If desired, download and distribute the optional TEMPLATE - Title III Consortium Budget Requests document to each participating consortium member. 3. Upload all completed documents to the Related Documents section of the funding application.		Verify required documents are completed and uploaded to the funding application.
Complete the Program Details Section of the funding application. Ensure all <i>Title III Program Assurances</i> have been acknowledged.		Verify all sections of the Program Details have been completed and assurances have been acknowledged.
Compile individual members’ budgets and submit the Title III Consortium application on behalf of the consortium. Confirm with all participating members that the required professional development and parent/family engagement activities have been included in the application.		Conduct fiscal and programmatic review of the funding application. Communicate all feedback and necessary changes to Lead LEA/Fiscal Agent via the History Log of the Title III application.
Confirm with all participating members that the Integrated Action Plans (IAPs) have been completed in ALEAT. NOTE: IAPs are required for funding application review and approval.		Review each LEA members’ IAP. Communicate any changes necessary to Lead LEA/Fiscal Agent via the History Log of the Title III application. Communicate with individual LEA members, as needed.
Communicate all necessary changes to LEA members regarding the funding application and Integrated Action Plan as requested by Title III Program Area. Revise and resubmit funding application as needed until approved.		Review submitted funding application for approval. Review IAP and confirm all Title III-funded items are identified with the Title III tag. All EL-related items that are not Title III-funded should have an EL tag.

NAVIGATING THE TITLE III APPLICATION IN GRANTS MANAGEMENT ENTERPRISE (GME) SYSTEM (con't)

Lead LEA/Fiscal Agent Tasks After Grant Approval		Title III Program Area Action
Submit Title III Consortium application revisions on behalf of the consortium. Note: Application revisions must be submitted with every fiscal or programmatic change to the original approved application.		Conduct fiscal and programmatic review of Title III Consortium application revisions. Communicate changes as needed through the History Log.
Submit timely and regular Title III reimbursement requests on behalf of the consortium. Note: Justifications must be provided in the History Log for any requests exceeding 20% of the budget.		No action needed from OELAS. Grants Management will process Title III reimbursement requests and collaborate with OELAS, as needed.
Submit Title III Consortium Completion Reports (CR) on behalf of the consortium. Note: Ensure the CR Program Details section is completed. For each participating consortium member, complete and upload one LEA Member Final Expenditures Report found in the CR Required Documents section.		No action needed from OELAS. Grants Management will process Title III completion reports and collaborate with OELAS, as needed.

NAVIGATING THE INTEGRATED ACTION PLAN (IAP) IN ALEAT

LEA Member Tasks		Title III Program Area Action
Create a comprehensive plan of support for English learners based on identified needs of LEA. Complete the Integrated Action Plan (IAP) in ALEAT to thoroughly describe all programs, services and activities the LEA will create and/or implement to support English learner students. Within the IAP: 1. Ensure the required professional development and parent engagement activities have been included. 2. Ensure Title III-funded activities are tagged with a Title III tag. Use an ELL tag for activities which support the EL program but are not funded with Title III funds. 3. Ensure IAP has been completed and a copy provided to the lead LEA/fiscal agent at the same time as submitting budget requests.		Conduct fiscal and programmatic review of Integrated Action Plan. Provide all feedback via the History Log of the funding application for lead LEA/fiscal agent to share with LEA members. Regional Specialists from OELAS may communicate directly with LEA members as needed.
Create a Title III budget based on the current year allocation and carryover, if applicable, to support the LEA's Integrated Action Plan. Ensure the required Title III activities are included for funding. Provide budget information to lead LEA/fiscal agent to identify the specific budget requests for Title III expenses. All budget requests must follow the USFR Chart of Accounts coding requirements.		Conduct fiscal and programmatic review of each LEA members' budget within the consortium application. Provide all feedback via the History Log of the funding application for lead LEA/fiscal agent to share with LEA members. Regional Specialists from OELAS may communicate directly with LEA members as needed.
Revise the IAP and Title III budget as needed throughout the year for any fiscal or programmatic change to an approved IAPs and budget. Notify lead LEA/fiscal agent to submit a Title III Consortium Application Revision.		Conduct fiscal and programmatic review of revised IAPs and applications. Provide all feedback via the History Log of the funding application for lead LEA/fiscal agent to share with LEA members. Regional Specialists from OELAS may communicate directly with LEA members as needed.

Lead LEA/Fiscal Agent Checklist for a Successful Grant Submission	
	Are the <i>Lead Agent Funding Forms</i> completed and uploaded to the application?
	Are the <i>Participating LEA Member – Certification and Assurances</i> documents completed for each member and uploaded to the application?
	Is the Program Details section of the funding application complete?
	Did all members include the required professional development in their budget?
	Did all members include the required parent/family engagement activity?
	Did each member abide by the 2% limitation for direct administrative expenses?
	Does the total of budget requests for each member match their individual allocation?
	Do all items listed in the narrative descriptions equal the line item totals?

Participating LEA Member Checklist for a Successful Grant Submission	
	Are the <i>Participating LEA Member – Certification and Assurances</i> documents completed and returned to the Lead LEA/Fiscal agent?
	Is the required professional development included in the IAP and the budget?
	Is the required parent/family engagement activity included in the IAP and the budget?
	Do all budget requests meet the supplement, not supplant requirement?
	Are direct administrative expenses within the allowable 2%?
	Are budget requests correctly coded to meet USFR Chart of Accounts requirements?
	Does the Integrated Action Plan fully describe the Title III program and funding support?
	Do the narratives in the application have clear and sufficient information?
	Is the math correct?