



Title III USDE Monitoring

Office of Federal Program Administration,
Title III

January 4, 2011

Title III USDE Monitoring

- May 2005 USDE visited Colorado's Title III program and issued 13 findings
- September 2010 visit, USDE issued 4 findings
 - Only one finding remained from the 2005 visit

Title III USDE Monitoring

- September 14-17, 2010 USDE reviewed CDE's administration of the ESEA, Title III program
 - Standards, Assessment and Accountability
 - Instructional Support
 - Fiduciary

Pre-Site Evidence

- 15 Major Indicators in the three areas of
 - Standards, Assessment and Accountability
 - Instructional Support
 - Fiduciary
- CDE collected and uploaded State and District level documents in July 2010 for USDE to review prior to the September visit.

On-Site Review

- 15 Major Indicators in the three areas of
 - Standards, Assessment and Accountability
 - Instructional Support
 - Fiduciary
- USDE visited two school Districts
 - Aurora Public Schools
 - Jefferson County School District
- USDE spent a day and a half at CDE interviewing CDE staff and reviewing State documents

Post Review Findings

- September 17, 2010 – USDE held exit conference with CDE staff
 - Issued preliminary findings
 - Applauded Colorado’s Title III program including application, monitoring and AMAOs
 - USDE has 30 business days to issue final Monitoring report

Post Review Findings

- Two Areas in which USDE issued findings
 - Fiduciary
 - Private Schools

Fiduciary Findings

*(1) Supplement , not Supplant –ESEA,
Section 3115(g)*

The CDE has not ensured its Title III subgrantees meet requirements related to supplement, not supplant.

Fiduciary Findings

Supplement, not Supplant Resolution

1. Greater level of Review of the Title III Required Element #6 (Supplement, not Supplant) of the Consolidate Application.
2. Written guidance was sent December 17, 2010 via a memo to all Title III contacts.

Fiduciary Findings

Supplement, not Supplant Resolution, cont.

3. Supplement, not Supplant guidance on the CDE website

<http://www.cde.state.co.us/FedPrograms/tiii/tiii.asp>

4. Technical Assistance, as requested.

Fiduciary Findings

(2) District Allocations, Reallocations and Carryover - ESEA, Section 3115(b)

The CDE has not ensured that its Title III subgrantees meet requirements related to the maximum percentage allowed for administrative costs. This includes all direct and indirect costs.

Fiduciary Findings

District Allocations, Reallocations and Carryover Resolution

1. 2011-2012 Consolidated application budget will have locked administrative 2% costs for Title III that include indirect and direct costs.
2. Guidance will be given during 2011-2012 consolidated application trainings.
3. Technical Assistance, as requested.

Instructional Support Findings

(1) Private School Participation – ESEA Section 9501(a)(1)

The CDE does not have a mechanism to collect information on the number of private school ELL students served by Title III grantees.

Consequently, the CDE cannot determine whether subgrantees have provided services to private school ELL children, their teachers and other educational personnel on an equitable basis.

Instructional Support Findings

Private School Participation Resolution

1. New Data Table added to the 2011-2012 consolidated application to report private school students participating in Title III programs.

**Data will report on 2010-2011 participating private school participation*

2. Guidance provided during Title III consolidated application trainings.

Instructional Support Findings

Private School Participation Resolution

3. Title III website that provides guidance on LEAs responsibility in providing equitable services to nonpublic school students.

<http://www.cde.state.co.us/FedPrograms/tiii/tiii.asp>

4. Technical assistance, as requested.

Instructional Support Findings

(2) Private School Participation – ESEA Section 9501(a)(1)

The CDE has not ensured that the LEAs implement ED's guidance on their responsibility to assist with initial English language proficiency assessment and identification of LEP students enrolled in private schools.

Instructional Support Findings

Private School Participation Resolution

1. Written guidance was sent December 17, 2010 via a memo to all Title III contacts.
2. Additional language will be added to Section 9501(a)(1) indicator that already exists in Tracker.
3. Interview with Private school representatives required for onsite monitoring visits

Instructional Support Findings

4. Title III website that provides guidance on LEAs responsibility in providing equitable services to nonpublic school students.

<http://www.cde.state.co.us/FedPrograms/tiii/tiii.asp>

5. Technical Assistance, as requested.

Questions????

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