

## Resource 6: Local Educational Agency (LEA) Allocations Checklist

Note: The LEA should be able to answer “yes” to each question on this checklist.

1. LEA Administration	Yes
a. Has the LEA reserved no more than 2% for administration of the <i>Title III</i> grant?	
b. Has the LEA reserved at least 98% of its allocation for required and allowable nonadministrative activities?	
c. Based on job function, did the LEA include all staff members who perform administrative functions in direct administrative costs?	
d. Are Personnel Activity Reports (PARs) available for all administrative personnel who are funded by more than one source (split-funded), or has a substitute system for time-and-effort reporting been established? PARs must: <ul style="list-style-type: none"> <li>– Account for the total time.</li> <li>– Be prepared and signed at least monthly.</li> <li>– Be signed by the employee.</li> <li>– Reflect the actual work performed.</li> <li>– Be examined regularly and used to adjust salary, if necessary.</li> </ul>	
e. Have semiannual certifications been prepared for all staff solely funded under <i>Title III</i> ?	
2. LEA Activities	Yes
a. Does the LEA’s plan include provision of the three required activities under <i>Title III</i> (a) to supplement the core language instruction educational program (LIEP); (b) to provide high-quality professional development to improve the instruction and assessment of English learners (ELs) and/or enhance teachers’ ability to understand and use curriculum, assessment measures and instructional strategies for ELs; and (c) to provide other effective activities and strategies that enhance or supplement LIEPs for ELs, such as parent, family, and community engagement activities?	
b. Are other uses of funds planned for other authorized activities, such as: <ul style="list-style-type: none"> <li>– Upgrade program objectives and instructional strategies.</li> <li>– Acquire curricula and instructional materials.</li> <li>– Provide tutorials/intensified instruction and academic or career and technical education.</li> <li>– Develop and implement effective preschool, elementary school, or secondary school LIEPs that are coordinated with other relevant programs and services.</li> <li>– Provide community participation programs, family literacy services, and parent and family outreach and training activities to ELs and their families.</li> <li>– Acquire or develop educational technology or activities that help ELs learn English and meet academic standards.</li> </ul>	

2. LEA Activities	Yes
<ul style="list-style-type: none"> <li>– Offer early college high school or dual-enrollment courses designed to help ELs achieve success in postsecondary education.</li> </ul>	
<p>c. Are the proposed LEA expenditures:</p> <ul style="list-style-type: none"> <li>– Allowable?</li> <li>– Allocable?</li> <li>– Reasonable and necessary to carry out grant function?</li> </ul>	
<p>d. Does the LEA use <i>Title III</i> funds to supplement rather than supplant other federal, state, and local funds?</p> <p>Use the following questions to identify services the LEA would provide in the absence of <i>Title III</i> funds:</p> <ul style="list-style-type: none"> <li>– What is the instructional program/service provided to all students?</li> <li>– What does the LEA do to meet civil rights requirements?</li> <li>– What services is the LEA required to provide, according to federal, state, and local laws or regulations?<sup>1</sup></li> <li>– Was the program/service previously provided using state, local, or federal funds?</li> </ul>	
<p>e. Do the LEA’s proposed activities reveal supplementing (not supplanting) when assessed by two tests or assumptions from the U.S. Department of Education (ED)?</p> <ul style="list-style-type: none"> <li>– <i>Test 1</i>: ED assumes supplanting exists if the LEA uses <i>Title III</i> funds to provide services that the LEA must provide under state, local, or other federal laws.</li> <li>– <i>Test 2</i>: ED assumes supplanting exists if the LEA uses <i>Title III</i> funds to provide services that the LEA provided in the prior year(s) with state, local, or other federal funds. (Note: This assumption can be rebutted with evidence provided by the LEA.)</li> </ul>	
<p>f. If applicable, does the LEA ensure that equitable services to ELs and teachers in private schools are provided? Such as:</p> <ul style="list-style-type: none"> <li>– The LEA maintains title to all materials, equipment, and property purchased with <i>Title III</i> funds.</li> <li>– The LEA makes the purchase of materials or procured services. The LEA does not reimburse private schools using federal funds.</li> </ul>	

<sup>1</sup> Note: It is not considered supplanting to use *Title III* funds for EL-related activities under *Title I* that were previously required by *Title III* (Non-Regulatory Guidance: English Learners and *Title III* § A-4).