**Forming or Joining a Title IIIA Consortium**

**Quick Reference Guide**

The state of Massachusetts awards Title IIIA grants to school districts based on the number of students identified as English learners (ELs) in the March student data transmission (SIMS). A school district is eligible if the calculated per-pupil amount adds up to an allocation greater than or equal to $10,000 (Title IIIA, [Section 3114(b)](https://oese.ed.gov/offices/office-of-formula-grants/school-support-and-accountability/essa-legislation-table-contents/title-iii-part-a/#TITLE-III-PART-B:~:text=in%20the%20State.-,LIMITATION.%E2%80%94,-A%20State%20educational)). If a school district does not reach this eligibility threshold, they may apply for a Title IIIA grant jointly with other districts in a consortium in order to be eligible to participate in Title IIIA.

**Considerations for Joining or Forming a Title IIIA Consortium**

A consortium that receives a Title IIIA allocation is expected to meet the same standards as all other Title IIIA grant recipients and follow the same Title IIIA requirements in carrying out the grant activities to increase the English proficiency of ELs by providing: 1) effective supplemental language instruction, 2) high-quality professional development, and 3) effective parent engagement activities, per Section 3115(c).

**Intent to Participate**

Title IIIA consortium applicants are required to indicate that they will join a consortium on their annual Intent to Participate form in [GEM$](https://mass.egrantsmanagement.com/) so that the grant funds may be allocated accordingly for the upcoming fiscal year.

**Title IIIA Consortium Responsibilities**

The responsibilities for both the consortium fiscal lead and the consortium member districts are described in detail in the [sample MOU](https://www.doe.mass.edu/federalgrants/titleiii-a/resources/sample-consortium-mou.docx). Briefly, these are as follows:

**Fiscal Lead**

1. Consult with member districts to identify the needs and in the MOU complete the Needs Assessment summary table.
2. Consult with member districts about appropriate Title IIIA activities to meet the identified needs and complete the Title IIIA Program Activities table on the MOU.
3. Facilitate the signing of the MOU by member districts and upload a signed and dated copy in GEM$.
4. Complete and submit the Title IIIA grant application in GEM$, including the *Non-profit Private School Participation* page with counts for member districts’ private school participation.
5. Initiate all Title IIIA grant revisions in GEM$, and ensure the MOU is re-signed by all member districts with each Title IIIA program modification and GEM$ revision.
6. Fully control all Title IIIA finances throughout the duration of the grant, including signing of all contracts and hiring/payment for Title IIIA program staff, including stipends. **No reimbursements for member districts are allowed.**
7. Provide consortium members (including member districts’ private schools) with agreed-upon services as defined in the MOU.
8. Communicate with all Title IIIA consortium members on topics such as provision of services, emerging needs of the EL population (including private school students), and necessary Title IIIA program modification and/or GEM$ revisions.

**Member Districts**

1. Consult with private schools within their school district’s geographical boundaries. Complete the [Affirmation of Consultation Form](https://www.doe.mass.edu/federalgrants/resources/equitableservices-essa/affirm-consultation.docx) and upload the document in GEM$ for all participating schools.
2. Complete the *Consortium Members Non-profit Private School Participation* page in GEM$ and share the reported private school EL counts on this page with the Title IIIA consortium fiscal lead.
3. Communicate with the fiscal lead on topics such as provision of services, emerging needs of the EL population (including private school students), and Title IIIA program modification when a change is needed in the approved GEM$ application.
4. Sign and the initial MOU and re-sign with each Title IIIA program modification and GEM$ revision.
5. Participate in the Title IIIA program activities as defined in the MOU.

**Memorandum of Understanding**

In order to create a consortium for the purposes of the Title IIIA grant, participating school districts must collectively enter into a [Memorandum of Understanding (MOU)](https://www.doe.mass.edu/federalgrants/titleiii-a/resources/sample-consortium-mou.docx) that states their agreement to form a Title IIIA consortium. The MOU must describe the manner in which the consortium will meet the Title IIIA requirements, including, but not limited to, those listed below under "Responsibilities of Fiscal Lead Agencies" and "Responsibilities of Participating LEAs".

By signing the MOU, the consortium members commit to participating in the grant activities proposed in the Title IIIA GEM$ application. However, consortium members are not required to participate in all proposed grant activities. Any Title IIIA grant revision must be completed in GEM$ by the fiscal lead. As part of the revision, the fiscal lead must upload a re-signed MOU acknowledging the member districts’ understanding and approval of the Title III grant modification(s).

**Provision of Equitable Services to Nonprofit Private Schools**

Services under Title IIIA, Part A must be meaningfully offered to nonprofit private schools to benefit eligible students, educators, and families, in a manner comparable to public school students’ services. DESE has published an [ESSA Equitable Services for Private Schools Resource Guide](https://www.doe.mass.edu/federalgrants/resources/equitableservices-essa/rg-eqserv.docx), outlining important guidance for the public schools’ outreach and consultation with the nonprofit private schools within their geographical boundaries. This expectation applies to all Title IIIA consortia members with private schools in their geographical boundaries.

In GEM$, all member districts complete the *Consortium Members Non-profit Private School Participation* page and upload all relevant Affirmation of Consultation forms. The fiscal lead completes the *Non-profit Private School Participation* page with all participating private school counts for each member district. All counts must be entered manually on this page by the fiscal lead district.

Below is an example for Nauset:



**Amendments/Revisions**

* Required when there is any significant change in program objectives; any increase or decrease in the total amount of the grant; an increase in a line of the budget that exceeds $100 or 10% of the line (whichever is greater) or exceeds $10,000.
* All consortium members re-sign the MOU with each Title IIIA program amendment/revision.
* For all FY24 and beyond FC 0180 grants approved or administered through Grants for Education Management System (GEM$), the revisions must be processed in GEM$.

**Supplement not Supplant in Title IIIA**

* Title IIIA is a supplemental grant. As such, Title IIIA cannot be used to fund activities that are required to be provided by the consortium member districts for the education of ELs to meet the requirements of Title VI of the Civil Rights Act, or other federal, state and local requirements.
* As a general rule, if a particular activity was paid with other funds, the same activity cannot be paid with Title IIIA funds in the current year. Theuse of Title IIIA funds to pay for services to ELs that were paid for in prior years with federal, state, or local funds raises a presumption of supplanting.
* All expenses, in addition to being allowable, have to be necessary and reasonable. § 200.403(a)