



**Beyond Title III: Support Multilingual Learners
with Title I and Other Funding Sources**

December 10, 2025
2:00pm ET

Dr. David Holbrook - NAELPA Executive Director


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Supporting Multilingual Learners with Title I
and other Funding Sources**

Dr. David Holbrook

*NAELPA-NAESPA
2025 Joint Webinar
December 10, 2025*



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Agenda

- EL Requirements in ESSA Title I
- Title I Funding to Support ELs/MLs
- Other ESSA Funding to Support ELs/MLs



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EL Requirements in ESSA Title I



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EL Related Changes made by ESSA

With the passage of the Every Student Succeeds Act (ESSA) in 2015, English learner* (EL) requirements in Title I under No Child Left Behind (NCLB) were retained, however, significant changes to English learner requirements were made, including moving sections of the law from Title III to Title I, removing accountability from Title III, and adding additional EL requirements in Title I.

**English learner is the term used in ESSA to identify students who are not English proficient*



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English Language Development Standards and English Language Proficiency Assessments

- ESSA removed the requirements to have English language development (ELD) standards from Title III and placed these requirements solely in Title I, Section 1111(b)(1)(F).
- ESSA also removed the requirements for English language proficiency (ELP) assessments from Title III. ELP assessment requirements for all ELs remain in Title I, Sec. 1111(b)(2)(G).



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Accommodations for ELs on ESSA Required Content Assessments

- Appropriate accommodations must be provided for ELs taking the annual content assessment (Title I, Section 1111(b)(2)(B)(vii)(III)). Without appropriate accommodations, ELs may not be able to fully demonstrate what they know and can do.
- It is also allowable (not required) to provide the annual content assessment in languages other than English. States must include in their ESSA State plans a definition of 'languages present to a significant extent' and are required to develop plans on providing assessments in those languages. NOTE: State are not required to implement those plans.



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EL Subgroup used for Title I Accountability

- For Title I accountability purposes, States have to select the number of years to include former ELs (ELs who attained English proficiency and are no longer receiving EL services) in the EL subgroup.
- Former ELs may be included in the EL subgroup for accountability for four years under ESSA.
- This is allowable but not required (see Title I, Section 1111(b)(3)(B)) and not all states chose the 4-year option or include former ELs in the EL subgroup at all.



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AMD and its relationship to ESSA Accountability

- Accountability for school and district academic performance is called Annual Meaningful Differentiation (AMD) in ESSA (see Title I, Section 1111(c)(4)(C)).

Annual Meaningful Differentiation

AMD includes an accountability indicator for ELs only (ELP) as well as differentiation requirements (disaggregation) for ELs for the other indicators.

School Improvement

The sole indicator for ELP means schools may be identified for Targeted Support and Improvement based solely on if the EL subgroup's ELP performance doesn't meet Title I accountability targets.



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EL Information included ESSA Report Cards

Required educational success of ELs reporting for States, Districts, and Schools

Subgroup Disaggregation	Progress and Attainment of English Proficiency	Meeting Long Term Goals and Interim Measures
Information on academic achievement and growth based on the State content test, disaggregated for ELs, must be included in state and local report cards.	Information on the number and percent of ELs achieving English proficiency (Section 1111(h)(1)(C)(iv)) must also be included on report cards.	Information on long-term goals and interim measures must be included on report cards, including, both progress toward and achievement of ELP.



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Required EL Parent Notification

- Parent notification for identification and placement of ELs is required of local education agencies (LEAs) in Title I, Section 1112(e)(3)(A) for all ELs in the LEA, not just those in schools that receive Title I funds. This letter is not required by ESSA Title III.
- ESSA Section 1116(f) requires LEAs to provide written communications related to parent and family engagement, to the extent practicable, in a language parents can understand.



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Eligibility for ELs for Title I Programs and Services

- Because all students in a schoolwide school are considered Title I students, ELs are automatically included as Title I eligible students in schools that operate a schoolwide program.
- English Learners in schools that operate a targeted assistance program are also eligible for Title I services based on the same criteria used to identify eligible students in the school.
- LEAs have some requirements related to all ELs and must meet those requirements for those ELs and their parents regardless of whether the ELs attend Title I funded schools or not.



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Title I Funding to Support ELs/MLs



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Title I EL Requirements and Funding

There are more requirements related to English learners (ELs) in ESSA Title I than there are in Title III. And some of those requirements have much greater impact on schools and LEAs.

There are three areas of Title I funding that LEAs can use to support ELs:

- School Improvement Grants
- Parent and Family Engagement Reservations
- School Improvement and Collaboration Reservations



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School Improvement Grants – Tied to Accountability

Accountability for English Learners

- Prior to ESSA, accountability for ELs progress toward and attainment of ELP was only found in Title III. Under NCLB, accountability for ELs academic performance was found in both Title I and Title III.
- ESSA removed all accountability requirements from Title III, retained EL accountability for academic performance in Title I, and added accountability for ELP and academic growth to Title I, Sec. 1111(c)(4)(B).
- Since there is no longer accountability for ELP nor EL content achievement in Title III, this places a significant burden on Title I regarding ELs attainment of ELP, EL and academic achievement.



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EL Accountability Indicators

Accountability indicators are used to make decisions regarding which schools are identified for School Support and Improvement

There are five accountability indicators found in Title I.

- 1111(c)(4)(B)(i) academic achievement (growth for High Schools at the State's discretion)
- 1111(c)(4)(B)(ii) growth or another meaningful measure (for non-high schools)
- 1111(c)(4)(B)(iii) graduation rates (for schools graduating students only)
- 1111(c)(4)(B)(iv) ELs progress toward English proficiency
- 1111(c)(4)(B)(v) school quality or student success indicator (chosen by the state)
- In addition to the ELP indicator, the other four indicators must be reported out for all students and for ELs separately (disaggregated).



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School Support and Improvement

Title I, Section 1003 says States must reserve (set aside) funding to provide grants for School Support and Improvement. It indicates that States must reserve 7% of the Title I, Part A funds it receives for school improvement purposes (95% must be used for either formula or competitive grants to LEAs for school support and improvement).

- Schools identified for Comprehensive Support and Improvement must develop an improvement plan that address the reasons why the school was identified based on the indicators in the previous slide for all students and separately for each subgroup. This means that if the EL subgroup is not meeting targets, this must be addressed in the school improvement plan AND school improvement funds can be used for these activities.
- Schools may be identified for Targeted Support and Improvement based solely on the performance of the EL subgroup as well.

*And Sec. 1111(b)(3) indicates that LEAs Title I plans must describe how the LEA will carry out its responsibilities related its schools identified for Support and Improvement.



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Parent and Family Engagement Reservation

Reservations aka Set-asides

- LEAs receive Title I grants from their state education agency. Before they send Title I funding to schools, LEAs are required to reserve or set aside funding for various activities.
- Set-asides happen before determining how much funding each Title I eligible school receives and are used by the LEA to carry out LEA wide activities.



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Regular Meetings with the Parents of ELs

Regular means more than once a year

- Title I, Section 1112(e)(3)(C) requires the holding and sending notice of opportunities for regular meetings for the purpose of formulating and responding to recommendations from parents of ELs assisted by Title I or Title III.
- NOTE: This is an LEA level requirement, not a school level requirement.
- These meetings must include the parents of all ELs, not just the parents of ELs served in Title I funded schools.



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Title I Outreach to the Parents of ELs

Title I has specific LEA requirements to “implement an effective means of outreach to parents of English learners” (Sec. 1112(e)(3)(C))1112(e)(3)(C)(i)(I-II)

- (i) Each LEA receiving Title I funds “shall implement an effective means of outreach to parents of English learners to inform the parents regarding how the parents can -
 - (I) be involved in the education of their children; and
 - (II) be active participants in assisting their children to—
 - (aa) attain English proficiency;
 - (bb) achieve at high levels within a well-rounded education; and
 - (cc) meet the challenging State academic standards expected of all students.”



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EL Parent and Family Engagement

Parent and family engagement policies are required for Title I funded districts and separately for Title I funded schools

- Title I, Section 1116 outlines significant requirements related to engaging parents and families, including the policies mentioned in the subtitle.
- Section 1116(a)(3) includes the requirement that LEAs receiving \$500,000 or more in Title I, Part A funds must reserve (set aside) at least 1% of its Title I funds “to carry out the activities described” in Section 1116.
- If a Title I funded district or school has ELs in its student population, this should be reflected in the activities outlined in its Parent and Family Engagement Policy and the set aside must “be used to carry out activities” identified in those policies (Sec. 1116(a)(3)(D)).



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School Improvement and Coordination of Services

Requirements in Regulations

- The purpose of regulations is to help clarify requirements set out in the law.
- Laws are written and passed by Congress (legislators).
- Regulations are written by government agencies, but have to be approved by Congress.
- Regulations have the force of law.



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Can Title I Funds be Used for EL Programs?

- The answer is YES. Title I, Section 1112(e)(3)(A) says, “Each local education agency using funds under this part or title III to provide a language instruction educational program . . .”
- The words, “this part”, refer to the section of ESSA, which in this case is Title I, Part A, which shows that Title I funds can be used to provide EL programs.
- Providing EL programs with Title I funds is usually related to EL accountability requirements, proactively to help meet targets, or reactively when failing to meet targets.



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Coordination of Services Requirements

Title I requires that Title I services are coordinated and integrated with services for ELs

- Title I, Sec. 1112(a)(1)(B) indicates that schools districts may receive a Title I grant only if they have an approved plan which is “coordinated with other programs under this Act” and other laws.
- Title I, Sec. 1112(c)(4) also requires districts to include an assurance in their Title I plan that they will ‘coordinate and integrate services provided by Title I with other education services at the district or school level’. Services for ELs are specifically mentioned in this section.



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Supporting ELs with Title I Reservations

- As mentioned, Title I reservations or set-asides are funds that the LEA holds to use to meet requirements for districts that receive Title I funds.
- We've seen that there are a number of LEA level requirements related to providing services to ELs and their parents and families.



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Does Title I Include a Set Aside for ELs?

- ESSA statute (law) does not include a specific mention of reserving Title I funds to meet an LEA's requirements related to ELs.
- In order to justify setting aside Title I funds to use to meet an LEA's responsibilities toward ELs, we need to look to regulations.
- Education regulations (34 CFR 200.77(f)) provides the requirements for reserving Title I funds at the LEA level to address school improvement and coordinated services



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Title I EL Reservations – Education Regulations

34 CFR § 200.77 Reservation of funds by an LEA.

Before allocating funds in accordance with § 200.78, an LEA must reserve funds as are reasonable and necessary to:

(f) Conduct other authorized activities, such as early childhood education, school improvement and coordinated services.



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Other ESSA Funds to Support ELs/MLs

While Title III funds are designated to support ELs and Title I has significant requirements to support ELs, other ESSA funding streams may or must be used to support ELs, their parents and families, and the educators that serve them.



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Title I, Part C – Migrant Education Programs

- Title I, Part C provides funding for LEAs or a 'local operating agency' to address the needs of migratory children that result from their migratory lifestyle.
- Title I, Part C, Section 1306(b)(2) indicates that if an LEA or local operating agency has funds that remain after meeting the unique educational needs of migratory children, those funds may be used to provide services that are allowable or required under Title I, Part A.



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Title II – High-Quality Educators

- While Title III has requirements to provide professional learning opportunities to educators that serve ELs, there are similar requirements in Title II.
- Title II, Section 2103(b)(2) requires that programs and activities funded by LEAs using Title II funds must address the learning needs of all students, including . . . English learners.
- Title II, Section 2103(b)(3)(F) indicates that it is allowable to use Title II funds for “developing programs and activities that increase the ability of teachers to effectively teach ELs so that ELs can meet the challenging State academic standards.”



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Title IV, Part A – Student Support and Academic Enrichment Grants

- There are three separate uses of Title IV, Part A funds that may or must be implemented depending on the amount of funding an LEA receives. Two of these activities can definitely be used to support ELs. One relates to technology purchases.
- Activities to support Well-Rounded Educational Opportunities (Sec. 4107(a)(3)) can include LEAs developing, implementing, and strengthening programs to teach a number of academic subjects in such a way that it allows ELs greater access to the academic content being taught.
- Included in the list of academic subject is 'foreign language instruction', which is cited as a source of using Title IV, Part A funds to implement the Seal of Biliteracy.



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Non-Federal Funds

- Most states include in their school funding formula a weight for students that are ELs. It's usually an additional amount that is a percentage of the per pupil base funding that is added to the funding per EL student.
- Some states have funding streams that are designated to provide services for ELs.
- Be creative with the funds that are available. If your state provides funds for professional learning, if you can, look into using those funds to provide professional learning for content teachers on how to serve ELs.
- Technology funds can often be used to support software purchases to support/enhance EL programs.



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Some Title I References for EL Requirements in ESSA

- Adoption of ELP Standards – Section 1111(b)(1)(F)
- EL Accommodations for content tests – Section 1111(b)(2)(B)(vii)(III)
- Content tests in other languages – Section 1111(b)(2)(B)(ix)
- ELP Assessment required – Section 1111(b)(2)(G)
- Assessment exemption for recently arrived ELs – Section 1111(b)(3)(A)
- EL Subgroup includes 4-year option for former ELs – Section 1111(b)(3)(B)
- Accountability goals for ELs – Section 1111(c)(4)(A)(ii)
- Accountability Indicator for ELs – Section 1111(c)(4)(B)(iv)
- EL reporting in State and Local Report Cards – Section 1111(h)(1)(C)(iv)
- Title I Coordination with other EL programs – Section 1112(c)(4)
- Outreach to the Parents of ELs – Section 1112(e)(3)(C)
- ELs eligible for Title I Targeted Assistance services – Section 1115(c)(2)(A)



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Build a network of peer support



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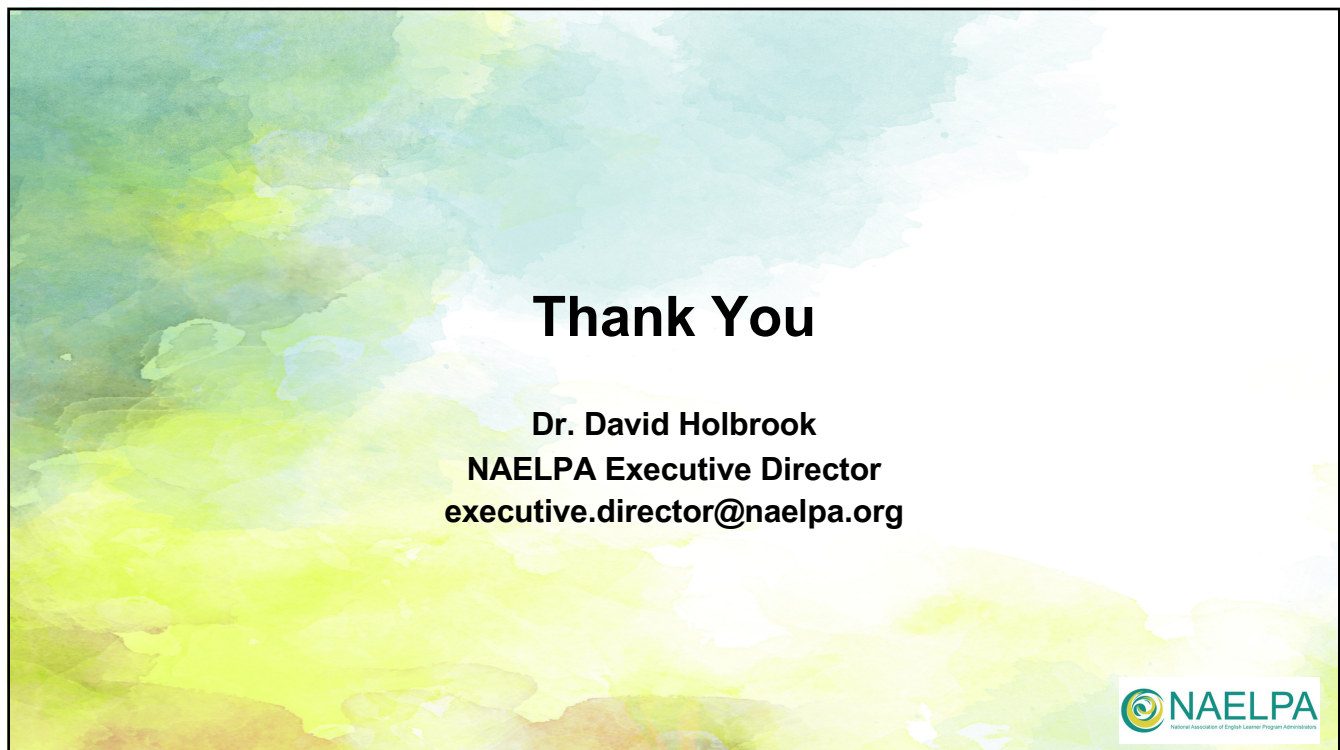
Opening Remarks and District Highlight Keynote led by Joanne Clyde

Tan Huynh

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Thank You

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