Department of Education & Workforce

Guidelines for Title III Consortia

Issue Date: 5/14/2026
Sources: Elementary and Secondary Education Act (ESEA) as reauthorized by the Every Student Succeeds Act (ESSA)
Key Words: Title III; Title III Consortia; English learners; funding; language instruction educational program
Summary: This document provides guidelines and requirements for establishing, joining and maintaining effective Title III English Learner consortia.

General Information

School districts and community schools with Title III English Learner (EL) allocations of less than $10,000 must join or form a consortium to participate in the Title III grant program[1]. A school district or community school may join with other districts and/or community schools to form a consortium of local educational agencies (LEAs) to receive Title III formula funds[2]. Under this arrangement, the sum of all members' Title III EL allocations must be greater than or equal to $10,000. In a Title III consortium, one of the LEAs must agree to serve as the lead LEA or fiscal agent of the consortium. The lead LEA shall be the sole grantee and shall administer the subgrant on behalf of all consortium members.

To access Title III funding, LEAs that receive less than $10,000 should be familiar with the process to form or join a consortium. Such a district or school could, for example, form a consortium with other LEAs to receive Title III funds or enter into an agreement with a larger neighboring district or school to receive services provided by the larger district or school. Some examples of consortia models in Ohio include:

- The fiscal agent provides consortium-wide services, such as professional development and supplemental instructional materials, directly to all districts and schools in the consortium.
- The fiscal agent enters into a contract with another entity to provide services to the member districts and schools.
- The fiscal agent distributes a portion of the consortium's allocation to each member district or school based on the number of ELs in each district or school.

[1] ESSA 3114(b) –A state educational agency shall not award a subgrant from an allocation made under subsection 3114(a) if the amount of such subgrant would be less than $10,000.

[2] 34 CFR § 76.303 – Joint applications and projects

Required and Authorized Subgrantee Activities

While Title III consortia fiscal agents are ultimately responsible for the administration of Title III among their respective member LEAs, all consortium participants should be familiar with the general purposes, required subgrantee activities and authorized activities under Title III. Detailed information is available in the Title III Purposes and Subgrantee Activities in the CCIP Document Library.

Title III EL Allocations

To determine a district's or community school's Title III allocation and whether consortium membership is necessary, LEAs must monitor their reported data and allocations. Title III EL allocations are calculated annually and are posted in the CCIP Document Library (CCIP Document Library >> Consolidated Funding Application >> Title III Language Instruction for Limited English Proficiency and Immigrant Students >> Allocations).

The Department calculates Title III EL allocations with the preceding fiscal year's enrollment data on a per pupil basis. Each LEA's allocation considers the number of English learners enrolled in the LEA, as well as the number of ELs enrolled and reported in the nonpublic school(s) located within the public district's boundaries. Public districts and community schools report their EL enrollment data in the Education Management Information System (EMIS). Nonpublic schools report their EL enrollment data in the Nonpublic Data System (NPDS). To ensure the most accurate allocations, districts and community schools should be aware of the EMIS Data Collection Calendars and report English learner counts by the established deadlines.

Preliminary allocations. Ohio receives preliminary information from the U.S. Department of Education about its Title III award in spring. With this award notification and with midyear student collection data, the Department calculates and posts the Title III EL Preliminary Allocations. Districts and schools may begin submitting the required consortium forms once the preliminary allocations are announced in the CCIP Document Library.

Final Allocations. Ohio receives final information about its Title III award in the fall. With this award notification and with end-of-year student collection data, the Department calculates and posts the Title III EL Final Allocations. By this time, consortium relationships are established, though allocations will be adjusted based on Ohio's final Title III award and data from the final reporting period of the preceding fiscal year. The Department may revise Final Title III allocations on occasion depending on the appropriation of funds from the U.S. Department of Education.

Responsibilities of Fiscal Agents

The consortium's lead LEA or fiscal agent shall be the sole grantee and shall administer the subgrant on behalf of all consortium members. The fiscal agent also is responsible for the following:

- The fiscal agent must have a valid Information Retrieval Number (IRN).
- The fiscal agent will complete, maintain and submit to the Department the required application materials annually, including but not limited to:
- The consent of member LEA superintendents to membership in the consortium (see the Title III Consortium Signature Page);
- The Title III Consortium Participation Form; Due by June 1st.
- Any agreements or memorandums of understanding (MOUs) between the fiscal agent and member LEAs.
- The fiscal agent will ensure consortium members fulfill their fiscal and programmatic responsibilities as subgrantees under Title III. See Title III Purposes & Subgrantee Activities for information about the required and authorized use of funds.
- The fiscal agent is responsible for the financial transactions of the consortium (requisitions, purchases, payments, etc.) and for maintaining records of the transactions carried out on behalf of the consortium.
- The fiscal agent will ensure that Title III transactions are allowable per federal and state guidance. See Title III Purposes & Subgrantee Activities for information about the use of Title III funds.
- The fiscal agent is responsible for completing and submitting Title III grant compliance surveys and any other necessary reports to the Department.
- The fiscal agent will conduct and document the meetings and correspondence with members, which determine the needs and activities of the consortium.
- The fiscal agent will complete and submit to the Department an annual evaluation of consortium membership satisfaction.
- The fiscal agent will encourage consortium members to expend all Title III funds during the grant year. If all funds are not expended within the grant year, the lead LEA will continue to serve as the fiscal agent for the consortium for the duration of the 27 months grant period and/or until the funds are expended. The Department will collect any unexpended funds after the end of the grant period.

Responsibilities of Consortium Members

Consortium members will communicate and cooperate in a timely fashion to assist the fiscal agent in the compliant administration of the Title III grant. The consortium members also are responsible for the following:

- Consortium members ensure the provisions received through the Title III consortium are supplemental to the programs and services districts and community schools provide to meet their civil rights obligations to English learners. Review federal Supplement, Not Supplant guidance for extended explanation.
- Consortium members discuss and document a common understanding, such as through a memorandum of understanding or service plan, with the fiscal agent that defines the role and responsibilities of the consortium lead and members, as well as the services, materials and supplies to be provided by the consortium.
- Consortium members will fulfill their fiscal and programmatic responsibilities as subgrantees under Title III per state and federal statute and policy.

The consortium will participate in the assessment of members' needs, including:

- Improving the effectiveness of their EL programs;
- Providing effective professional development that improves the education of ELs;
- Supplementing their EL programs' parent, family and community engagement activities; and
- Coordinating and aligning Title III activities and related programs.
- Consortium members agree to effectively and efficiently use Title III funds to meet the identified needs of the consortium members based on the needs assessment.
- The consortium will plan to expend all Title III funds during the grant year.
- Consortium members will participate in meetings, correspondence and other interaction with fiscal agents to facilitate administration of the grant.

Instructions for Forming a Consortium

Step 1 – Fiscal agent and members become familiar with Title III provisions, purpose and regulations

Review federal and state guidance regarding English learners, Title III and consortia:

- U.S. Department of Justice & U.S Department of Justice, Dear Colleague Letter on English Learners
- Every Student Succeeds Act, Title III, Sections 3001-3203 (pp.197-214)

- Non-Regulatory Guidance: English Learners and Title III of the ESEA, as amended by the ESSA Supplement Not Supplant Provision of Title III of the ESEA
- Title III, Part A, English Language Acquisition, Language Enhancement, and Academic Achievement Equitable Services to Private School Students, Teachers and Other Education Personnel
- Title III Purposes and Subgrantee Activities

Step 2 – Fiscal agent confirms members and submits completed forms to the Department

From the CCIP Document Library, download and complete the Title III Consortium Participation Form Due June 1st and Title III Consortium Signature Page (MOU) uploaded to the budget details page in CCIP funding application. . The forms are fully functional when opened with Adobe applications and/or Internet Explorer. Based on the browser you are using, please consider the directions below:

Chrome, Firefox, Edge, and other browsers (the form may not be fully functional):
- Save the Consortium Participation Form and Signature Page on your device.
- Open and fill out with Adobe Acrobat (Reader or Professional).

Internet Explorer:
- Fill out in the IE browser, save on your computer and submit via email; or
- Complete the same steps above for Chrome browsers.

Submit the participation form and signature page electronically to the Department to Michael Crace, Title III Coordinator at michael.crace@education.ohio.gov. Maintain the completed forms in the fiscal agent's records. Department staff will send confirmation of submission within two to three business days after receipt.

Step 3 – The Ohio Department of Education and Workforce approves the consortium and posts the funds

After the Department approves the consortium, the funds from the member LEAs' allocations transfer to the lead LEA's funding application in the CCIP. Fiscal agents should review the consortium's member list and allocation for accuracy and contact the Department with any concerns.

Important Notes:

- Participating districts and community schools should complete their ESEA grant applications in CCIP as soon as possible to ensure the earliest substantially approved

date. Funding applications submitted in authorized representative status by July 1st will have a July 1st substantially approved date.

- To maximize the time Title III consortia, have to expend funds, the consortium form deadline was moved to late spring for the 2025-26 grant cycle. The deadline for 2025-26 school year is June 1st, 2025. Hereafter, these forms will be due on June 1st.
- In the funding application, consortium participants should leave the Title III Budget page blank. Consortium participants, however, must complete the required narrative sections of the Title III Budget Details page.

Instructions for Joining a Consortium

School districts and community schools that would like to join a Title III consortium should contact the Title consortium fiscal agents directly to express their interest. The most recent Title III Consortium list is posted on the Department Title III website- search key word Title III Consortium.

Consortium Models

In Ohio, two Title III consortium models are common. The difference between the models is which LEA acts as the fiscal agent.

1. **District/School-based Consortia.** School districts and community schools form a consortium with one of the districts or schools designated as the fiscal agent.
2. **ESC-based Consortia.** School districts and community schools with a regional educational agency, such as a county educational service center (ESC), designated as the fiscal agent.

A third possible model is to create a consortium under the fiscal agency of the state, though this model currently does not exist in Ohio.

Questions?

Contact Michael Crace, Title III coordinator michael.crace@education.ohio.gov (614)387-7555