



**National Association of State Title I  
Directors and TESOL Joint Statement  
on the Reorganization of the Title III  
State Formula Grant Administration**

*October 27, 2008*



Over the course of the last decade, the population of English language learners in the public education system has increased by more than 56%, with over 5 million English language learners now enrolled in U.S. schools. With English language learners present in almost every district, school, and classroom in the United States, meeting the educational needs of these students has become one of the most pressing and critical issues facing the U.S. educational system.

Although the No Child Left Behind Act (NCLB) requires states to close the achievement gap for English language learners, many states struggle to effectively serve these students. Within NCLB, Title III is the only section of the law that is specifically focuses on addressing the English language proficiency of English language learners. Developing academic proficiency in English is critical for the academic achievement of English language learners, and thus Title III and the Office of English Language Acquisition (OELA) serve a vital role in the U.S. educational system.

In June, the U.S. Department of Education announced that the administration of the Title III State Formula Grant Program would be moved from OELA to the Office of Elementary and Secondary Education (OESE). The stated purpose of this reorganization is to ensure that the U.S. Department of Education has in place a coordinated, consistent, and comprehensive system for administering Title III, including the monitoring of State and district compliance in conjunction with similar requirements under Title I.

Given this particular situation, TESOL and the Title I Director's Association urge the Department to address the following issues in the best interests of the students that are served:

*Maintain the unique pedagogical focus of the Title III grant program*—As stated above , Title III is the only section of NCLB specifically focused on addressing the English language proficiency of English language learners. Title I and Title III each have a different purpose and focus, and the integrity of each program must be maintained. For Title III, this means maintaining the program's exclusive focus on second language acquisition, and ensuring the formula grant staff is knowledgeable of second language pedagogy and methodology in order to effectively enforce compliance. For Title I, this means understanding the elements of second language acquisition and effective language acquisition programs, and being aware of the key differences between these and Title I programs.

*Improve coordination and articulation between Title I & Title III*—Both Title I and Title III address academic areas that are critical for success in school. As many English language learners are eligible for both Title I and Title III programs, this reorganization

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presents an opportunity for improved coordination and articulation between Title I and Title III at both the state and federal levels. Procedural issues may be worked out, and each program may learn from the other. Furthermore, as English language learners develop academic language proficiency and exit language instructional programs, clearer articulation between the two programs can ensure that the academic needs of these students are still being addressed. Most importantly, this reorganization presents an opportunity for transparency and open communication between Title I and Title III, especially in addressing challenging issues.

*Foster meaningful collaboration*—Language acquisition occurs throughout the school day and across all academic content areas: thus effective and meaningful collaboration between ESL/bilingual educators and content-area teachers is essential for English language learners' academic success. This reorganization represents an opportunity for the Title I and Title III offices at the federal level to encourage and foster such meaningful collaboration at the state and local level. It is essential that Title I and Title III work in close collaboration on improving the education of English language learners and coordinate their efforts to reach all schools and teachers.

As the population of English language learners continues to increase in U.S. schools, the entire public education system must be sensitive to the needs of these students at its core in order to ensure that all students succeed academically.