DECISION MAKING AND TITLE III OF NCLB

by

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Decision Making and Title III of NCLB

A dissertation submitted in partial fulfillment of the requirements for the degree of Doctor of Philosophy at George Mason University

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Dedication

This is dedicated to my husband Jason, and my mother, Susan Fell. Both inspired me to chase my dreams and reach for the stars. Without them this would not have been possible.
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I would like to thank the many friends, relatives, and supporters who have made this happen. My loving husband, Jason, supported me through late night study sessions, weekend trips to the library, and countless gripe sessions. I would like to thank my mother, Susan who encouraged me to become a doctor when I was a little girl. I would like to thank my father, John for allowing me to live with him free of charge while I was a poor graduate student. Dr. Scott Bauer, the other members of my committee and the Education Leadership Program were of invaluable help and inspiration throughout this process. I would like to extend a special thank you to Dr. David Brazer for helping me all the way from California to organize my thoughts and to maintain focus. Finally, thank you to my research site and those who participated in my study for the patience and time you awarded me.
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Abstract

DECISION MAKING AND TITLE III OF NCLB

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George Mason University, 2015
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This study examines how school leaders within one school district make decisions regarding federal funding for English language learners (ELL), also called English learners (EL), and how they make sense of the policy that influences their practice. It is a descriptive case study that is qualitative in design—focusing on interviews with program leaders, observations of meetings, and archival data. Nine participants were interviewed for this study. This research has implications for policy and practice within the school district being studied, as well as for educators impacted by policy implementation elsewhere.

Within this school district, Title III funding is being spent in a way that benefits English language learners as a group; however, the goals of the school district are impeded by the interpretation of Title III and by outside organizational influences. School district leaders know they are required to spend federal money in allowable ways, but it is hard to make sense of what is an allowable expense due to interpretation of the law. Further, the current method that school district leaders use to allocate resources does
not accurately track where money is spent, therefore some English language learners in the school district are not benefiting from money they are entitled to through Title III.

This study is important because money allocation influences selection of programs and practices, as well as the decision making of principals and teachers, thus impacting student achievement. Looking at the decision making process and how leaders make sense of Title III policy within a school district may strengthen how they make their decisions, and it could alleviate the problems that arise during the decision making process. It is important to school and district leaders themselves, as it provides valuable insight with regard to funding the ELL program and how federal money impacts students.
Chapter One

The number of English language learners (ELLs), also referred to as English learners (ELs), in Virginia’s public schools increased by 298% between the 1999-2000 and 2009-2010 school years (National Clearinghouse for English Language Acquisition, 2011). According to the Virginia Department of Education (2011), there were over 125,000 ELL students enrolled in Virginia’s public schools during the 2013-2014 academic years. This group of students poses many challenges for school officials and policy makers due to the diverse and immediate needs inside and outside of the classroom (Ramsey & O’Day, 2010). Educators and policy makers alike are faced with pressures and expectations for educating these youth and must think about ways in which to do so effectively.

The No Child Left Behind Act of 2001 requires that all children be proficient in reading and math, and that every child receive the education and tools needed to accomplish this goal. The law acknowledges that specific groups may need additional support to reach academic and English language proficiency and provides monetary assistance to school districts to accommodate these students. Title III of NCLB sets specific goals for EL students to ensure that they develop and reach English proficiency, attain high levels of academic achievement in core content areas, and “meet the same academic content and achievement standards that other children are expected to meet”
The goals established through NCLB intend to level the playing field for ELL students and to ensure that schools are held accountable for their learning.

**Background of English Language Learners in Education**

The history of accommodating students whose primary language is not English is a political and contentious one that dates back to the conception of the United States (Brown, 1992; Nieto, 2009). Challenges related to educating this population and changes made as a result of legislation and litigation over time have been difficult for educators and policy makers alike due to required changes and updates (see Appendix A for a summary). Language education policy is not just about pedagogy; it involves social, political, and economic factors that influence school boards, state policy makers, and the federal government (Wiley, 2007). Gándara and Gómez (2009) describe the evolution of language acquisition policy and litigation and describe one of the earliest cases. In *Meyer v. Nebraska* (1923), the court ruled that it was acceptable to educate immigrant youth in their native language. The first piece of legislation that formally recognized the needs of limited English proficient students was the reauthorization of the Elementary and Secondary Education Act (ESEA) of 1965 in 1968, in which bilingual education policies were embedded (Stewner-Manzanaras, 1988). The Bilingual Education Act (BEA) within ESEA stated that Congress would provide financial assistance to school districts to create elementary and secondary school programs designed to meet the needs of limited English proficient students (Valencia, 2008); however, due to funding and implementation problems, the BEA was not carried out as intended.
*Lau v. Nichols* (1974) was the landmark case for ELL students. The United States Supreme Court ruled that merely providing equal access to education for those who do not speak native English is not an adequate educational opportunity. The ruling stated:

There is no equality of treatment merely by providing students with the same facilities, textbooks, teachers, and curriculum; for students who do not understand English are effectively foreclosed from any meaningful education. Basic English skills are at the very core of what these public schools teach...We know that those who do not understand English are certain to find their classroom experiences wholly incomprehensible and in no way meaningful. (*Lau v. Nichols*, 1974, p.3)

In the 1980’s there was strong opposition to bilingual education and the Bilingual Education Agency was changed so that funding went to English-only programs (Brown, 1992; Nieto, 2009). In the 1990s, the pendulum swung again in favor of bilingual education programs and the Improving America’s School Act of 1994 “signaled a new, more positive attitude toward primary language instruction and preferences for programs that served to conserve native languages and expand bilingualism” (Gándara & Gómez, 2009, p. 583). Most recently, with the creation of NCLB, bilingual education programs were frowned upon once again, and references to bilingual education were removed from the legislation. English language learners are now accounted for in a different way. ELL students are expected to learn English and are tested for proficiency in core academic classes just like their peers (Menken, 2010).

The changes in policy over the years led to ambiguity and uncertainty (Gándara & Baca, 2008) among school leaders regarding program implementation, including ways in
which federal money could be used to educate ELL students. With the inception of NCLB, the bar was raised for ELL students, teachers, and schools, as schools are required to make adequate yearly progress (AYP) toward proficiency defined in the bill for all students, including English language learners.

To account for this added pressure, the federal government allocates funding for students to assist schools in meeting stated goals.

The Title III State Formula Grant Program provides federal monies to the states for the education of these students. In return, states are required to demonstrate that students are proficient in state content and achievement standards in mathematics, reading or language arts, and science. (NCELA, 2011b p. 1)

Title III of NCLB provides supplemental funds for English language learner programs. These programs provide money to purchase resources such as additional instructional personnel, programs, services, and materials that will enhance a child’s education. Title III typically provides a supplement of approximately $100 per ELL served (Tanenbaum & Anderson, 2010).

Federal, state, and local entities contribute to the lump sum of money that a school district has for ELL students, but Title III money comes from the federal government and must be spent in specific ways. The money must be used to supplement current instructional practices such as providing professional development for educators and parental outreach. Federal funding is allocated to the states based on the number of ELLs served in that state. School districts request funding from the state through an online system where their goals for student achievement are listed and a budget worksheet that
displays how Title III money will be spent is provided. After the request is approved by
the state, the district is given permission to begin purchasing materials, services, etc. that
are disseminated through the school system. After purchases, the school district is
reimbursed by the state for the money spent.

Title III in Virginia

In the 2011-2012 academic year, funding allocated to English language learner
programs in Virginia was approximately 11.2 million dollars and the funding for 2012
and 2013 was approximately 11.6 million dollars (United States Department of
Education, 2012). This equates to approximately $120 per ELL in the state of Virginia.
Although overall spending on ELLs has increased under NCLB, grants are no longer
concentrated for maximum impact in particular schools (Antunez & Casserly, 2004), and
there is ambiguity in the procedures for reporting how money is spent (Ramsey & O'Day,
2010; Tanenbaum & Anderson, 2010). Although school systems maintain expense
reports to show what was purchased, budget documents fail to show how these resources
are distributed within school systems and in what capacity. Making sense of the policies
and guidelines that surround Title III, variation in reporting procedures, and decisions
about how organizational goals will be accomplished muddies the water and creates
difficult task for school leaders who must navigate the process.

Purpose

The purpose of this study is to determine how a single school district allocates
federal funding for ELL students. Through this study, I learned how Title III policy is
implemented within this school district, specifically how leaders make decisions
regarding what goods and services will be purchased for EL education and how these items are distributed to the schools. Tracking these specific decisions will show how English for Speakers of Other Languages (ESOL) program leaders make sense of the Title III policy, what factors contribute to the decision-making process of ESOL program leaders, who contributes to the decision-making process, and how Title III money is used.

Resource allocation has an impact on student achievement both at the district and school level (Gándara, Rumberger, Maxwell-Jolly, & Callahan 2003; Jimenez-Castellanos 2010a; Jimenez-Castellanos & Rodriguez. 2009). The intent of this study is not to highlight the equity or adequacy of categorical funding as other studies (Darden & Cavendish, 2011; Houck, 2010); rather, it is to examine the process that takes place before the spending occurs and follow the flow of money as it goes into the school district. The purpose of this study is to add to the existing research regarding school spending at its inception as opposed to looking at the results, thus helping reveal the path of the money through the school system and into the schools and how school leaders influence that process. The study deals with the process of Title III implementation so that school district personnel can critically examine and improve upon its practices to make the most of Title III funding.

Setting

Radcliff School System, the focus of this study, is a school district located in a large, diverse, suburban area in Virginia. The number of ELL students increased from 1,781 students in the 1999-2000 academic years to 13,959 students during the 2009-2010 academic year, an increase of 683.8% (NCELA, 2011b). Since 2010, the number of ELL
students has continued to rise, with the number of ELL students for the 2013-14 academic year reaching over 18,000 (Virginia Department of Education, 2011). With this explosion of ELL students in the district’s schools comes the added responsibility of school leaders to educate these students and meet the goals of the No Child Left Behind Act. It is important to acknowledge where this study is conducted because it is an area similar to many others in the United States where a steady increase in English language learners, limited funding for working with these students, and responsibility to uphold the regulations of the policy and obligation to meet school district goals leave personnel with important decisions surrounding funding and implementation.

**Research Questions**

To learn about decisions regarding federal funding for ELL students within a school district and how school leaders make sense of implementation of that federal policy, the following research questions are used within this study:

1. How do Radcliff School District central office leaders make sense of Title III policy?

2. What factors contribute to the decision-making processes of Radcliff School District central office leaders regarding the allocation of funding for ELL students?

3. How is Title III federal money allocated within Radcliff School District for English language learner education programs?

What is Title III money spent on?

**Significance**
This study adds to the existing literature regarding allocation of federal funds for ELL students by providing an in-depth look at the decision-making processes and spending practices of leaders within a school district. Literature is available regarding inter- and intra-district spending in the aggregate, and describing the national breakdown of uses for Title III money (Chambers, Lam, Mahitivanichcha, Esra, Shambaugh & Stullich, 2009; Jimenez-Castellanos, 2010a); however, there appears to be little clarity at the school district and school level regarding allocation and the flexibility of funding. This is significant because the school district and school are where the money has maximum impact on students. This may be the case even more so for English language learners who typically perform below their peers and need additional support. It is important for policy makers, education leaders, and the general public to know where the money is going, and why.

**Research Significance**

This study will constitute a starting place in determining how district-level and school administrators make decisions that influence schools, teachers, and ELL students. It will contribute to the existing body of research and recent evaluations that have been published regarding Title III and ELL funding (Cook, Linguanti, Chinen & Jung, 2012). Previous research provides little qualitative data reflecting the inner-workings of a large, heavily ELL-populated school district and how money is spent within that school district. My research provides a lens through which policy makers and educators can see how Title III policy is being implemented so that if change is needed, reform can take place.

The federal government and certain state education agencies have evaluated Title
III for accountability purposes and to gain understanding of English language learner program implementation. There is a steady increase in the number of ELL students in schools but their language proficiency and academic growth is hard to measure due to the fact that once students test out of ELL programs, their information is no longer collected and new, lower English proficiency level ELL students take their place, similar to a revolving door (Boyle, Taylor, Hurlburt & Soga, 2010; Ramsey & O'Day, 2010; Tanenbaum & Anderson, 2010). There is no specific published report of how money is used at the micro level and if money allocated to school districts for the use of ELL students is actually being used for those students. State and district officials reported that the amount of money provided for ELL students is not enough and there are disparities across the state and even across districts with respect to how money is spent (Cook, Linguanti, Chinen & Jung, 2012; Tanenbaum & Anderson, 2010), showing that funding for ELL students is different depending on the location and the leadership of each school agency.

Title III funds are used for instruction (staff, materials and equipment), instructional and student support (professional development or other support), and administrative costs (Chambers et al., 2009). Nationally, the majority of Title III funds is spent on instructional staff, materials, and other instructional services (386 million dollars or 74% of the overall spending), and the rest is spent on professional development, administrative costs, or other instructional materials (Chambers et al.). I address the same questions as Chambers et al. in this study, but at the school district and school level and with respect to Title III funds only. Looking at how funding is distributed at the local
level demonstrates how money is being put to use within the schools and how students are benefiting. Aggregate studies and evaluations have been done for categories of spending aspirations or intentions of Title III funding; whether school systems actually spend money this way, or if there is flexibility or adjustment during program implementation in how the money reaches the schools within a system is an added value of this study.

In addition to the government issued evaluations of Title III, there has been limited research conducted concerning spending for ELL students within school districts and between schools. Out of seventy empirical cost analysis studies of school districts published after 1990, only four directly dealt with ELL students “although each of the costing out methodologies accounted for ELLs in some way, the level of consideration and detail varied substantially across methodologies” (Jimenez-Castellanos & Topper, 2012 p. 204). Not only was limited information found regarding ELL students in cost analysis literature, but the findings of those cost-analyses were not consistent (Jimenez-Castellanos & Topper). There is a need for research that will assess whether and how districts are using the categorical aid allocated to ELLs (Jimenez-Castellanos & Topper). Problems include:

limited public transparency and accountability for resource allocation…funds misused at the school level to such a degree that they are highly related to low achievement, [and a] need to understand the cost of effective programs for English Language learners, which include both base funds and categorical funds ….(Jimenez-Castellanos, 2010b p. 18)
Thus both government evaluations and independent research suggest that more research needs to be conducted regarding funding for ELL students. This study will add to the existing body of research and help researchers, educators, and policy makers understand the process behind spending Title III money at the local level.

**Practical significance.** Currently, there is an achievement gap between ELL students and their English-only speaking counterparts (Gándara, Rumberger, Maxwell-Jolly, & Callahan, 2003; Gunderson, 2008). This gap is due in part to students’ lack of English language but also factors such as poverty, interrupted education, or unstable home situations (Collier, Combs, & Ovando, 2006). ELL students face additional challenges in school such as teachers and counselors who offer little support, leaving them to their own devices in a confusing environment (Ferguson, 2007).

The Virginia Department of Education (2013) reports in 2011 the rate of high school completion for ELL students was approximately 63%, whereas White and Black student subgroups had approximately an 86% and a 73% completion rate, respectively. ELL students are graduating at a 10-23% rate lower than their White and Black counterparts. In addition to lower graduation rates, the test scores on reading and mathematics standardized tests are also significantly lower for ELL students compared to White and Black students. During the 2013-2014 school year, 87% of White students and 71% of Black students passed their English Reading standardized test, while only 54% of ELL students passed (Virginia Department of Education, 2014c). The reading test is of the utmost importance for students in high school because it is a requirement for graduation. The results in mathematics are similar: 85% of White students and 69% of
Black students passed the mathematics standardized tests while only 63% of ELL students passed (Virginia Department of Education, 2014c).

Presently, school districts receive funding from local, state, and federal entities to put toward purchasing supplemental instructional materials to combat the statistically low graduation rates and academic disparities of ELL students, but how they make decisions on what programs to endorse, initiatives to start, or expenditures to make is not clear. By examining federal funding practices at the school district level, this study can help school leaders make more informed decisions and help educators better understand how decisions they make influence students.

Once school leaders and policy makers are aware of the funding processes that impact student learning and schools, they can execute decisions and implement initiatives in an efficient manner. Improving current spending practices across the school district and within schools so that money is being used for maximum impact on student learning and student achievement is an area of importance because it may help to close or narrow the achievement gap described above. Millions of federal dollars have been spent to educate ELL students in a manner appropriate for NCLB but because these mandates have been made in the last decade there is little research that shows how money is being disseminated within the school district and how leaders are making their decisions. This study will inform the practice of school leaders because every decision they make influences student outcomes.

**Personal significance.** As an ESOL teacher, I am deeply invested in the success of my students and the success of the community. I work to ensure my students are
academically and socially prepared for life after high school. This study has special significance to me because I have seen how Title III funding has been used in the past. As a practitioner and aspiring school leader, I believe that understanding current spending practices of school district leaders will lead to improved choices that benefit ELL students. It is for that reason that I have decided to focus my research efforts on answering how Title III federal money is being spent and what factors contribute to the distribution of funds.

**Definition of Terms**

The following terms are used throughout the study and are defined as follows:

An *English Language Learner* or ELL refers to someone who is acquiring proficiency in the English language. In this study, ELL refers to current students (in grades k-12) who receive services to help them acquire the English language such as special instruction by a certified teacher, instructional support or materials, or other accommodations. These students can be either recent immigrants or American-born citizens who have been in school since kindergarten but lack proficiency in the English language. Students who were at one time ELL but no longer receive accommodations have either opted out of the program or have demonstrated mastery of the English language by passing a test that is used to measure language growth. In Virginia, students are classified as ELL by scoring a one through six on the World Class Instructional Design and Assessment (WIDA)—a score of one designates the student as a novice English speaker and score of six indicates the student has reached English mastery. All states that are part of the WIDA Consortium follow this system of language proficiency testing and rating. Currently
there are twenty-nine states in the consortium, including Virginia (World-Class Instructional Design and Assessment, 2011).

*English learner* (EL) is a term that is synonymous with English language learner. It is used to describe students who are labeled as limited English proficient and who receive accommodations in their classes and on their state mandated tests. Some participants refer to English learners as ELL students or as ELs during the interviews or in documents.

*English as a Second Language* or ESL is a term used synonymously with ELL to describe students who are learning English as a second language.

*English for Speakers of Other Languages* or ESOL is also used to describe an ELL in the context of ‘the ESOL student’. In this study, ESOL can refer to a student or the program that the student is a part of. ESOL is the acronym associated with the program being studied in Radcliff School District.

*Limited English Proficient* is a term used to describe a student who receives ESOL services or one who is an English learner.

*No Child Left Behind* (NCLB) is the legislation signed into law by President George W. Bush in an effort to improve the current state of education with the intent of closing “the achievement gap with accountability, flexibility, and choice, so that no child is left behind” (No Child Left Behind Act of 2001, 2002, p. 1).

*Title III* is a section of NCLB that addresses the instruction of limited English proficient children and immigrant children. Title III designates money to states from the federal government to educate ELL students. Money can be used from the grant to
educate students who are deemed limited English proficient and can be spent on supplemental materials or instructional programs that will assist school districts in meeting the goals of Title III (United States Department of Education, 2004).

*Site-Based Management* is an organizational structure employed by the school district being studied in which principals have the ability to make decisions related to their schools with respect to staffing, budgeting, course offerings, structure, etc. “Site-based management may also be an administrative reform to make management more efficient by decentralizing and deregulating it…management efficiency presumably serves the ultimate goal of the organization—student learning” (David, 1995, p.2).
Chapter Two

The 2010 Census reports that the United States is becoming increasingly diverse (United States Census, 2010). The accountability provisions in the No Child Left Behind Act (2002) call for equal and adequate educational measures to ensure that all students reach their full academic potential regardless of race, social class, legal status, or language spoken. English language learners are diverse not only in ethnicity and the languages they speak, but they also have unique and demanding educational needs. For example, students who are labeled as English language learners may have varying academic proficiency or prior schooling, some may have had scarring pasts in war-torn or impoverished countries, and others may be experiencing poverty (Collier, Ovander, & Combs, 2006; Gándara & Contreras, 2009).

Title III of the NCLB Act provides support for the education of English language learners. As established in the previous chapter, more needs to be learned about the implementation of Title III and the flow of resources that support ELLs. The purpose of this section is to provide a review of literature and conceptual framework that will help the reader understand the constructs of this study. The literature review explains implementation of policies and funding specifically impacting English language learners. The conceptual framework explains the theory of decision-making that provides a research perspective to better understand what is taking place within Radcliff School
Review of Literature

To learn about which studies have already been conducted regarding Title III as a policy and money allocation for English language learners and to better understand the topic of decision making, I conducted a review of literature. Using electronic databases (Dissertation and Theses, EBSCO, ERIC, Google Scholar, JSTOR) and combinations of search words such as English language learner, decision making processes, allocation of federal funds, ELL policy implementation, and school funding, I looked at relevant literature and articles within peer-reviewed journals, legal documents, government reports, and policy briefs. Below I provide a summary of policy and funding as they relate to ELL education and later discuss conceptual theory that provides a lens in which to view this study.

Policy and Practice

The No Child Left Behind Act (2002) signaled a time of change in United States Education policy and practice. The Elementary and Secondary Schools Act of 1965 had major objectives of “increasing accountability for results, focusing on research-based practices (i.e., ‘what works’), providing better-quality instruction, and empowering parents with choice options” (Thomas & Brady, 2005 p. 55). Within the gradual development and implementation of language policy there have been sudden policy shifts that changed the direction of language policy altogether or created new regulations educators are required to implement. These sudden bursts or disruptions have an impact on student learning and on school operations in general.
Punctuated equilibrium is a theory that suggests that policy changes gradually, over time with sudden bursts of radical change (Baumgartner, Jones & Mortensen, 2014; Kingdon, 2003). This concept can be used to describe the NCLB legislation regarding English language learner education. Punctuated equilibrium helps explain that certain policy “should reveal long periods of stable, incremental change interrupted by bursts of lurching, large-scale change, followed again by stability and gradualism” (Cohen-Vogel & McLendon, 2009, p. 742). For example, the reauthorization of the *Elementary and Secondary Education Act (ESEA)*, being signed into law as the *No Child Left Behind Act*, was one of those bursts of change and since its inception, policy makers and education representatives have been tinkering with implementation of the law to get it right. The law, and specifically Title III of NCLB, gradually evolved and although the goal of educating all students remains the same, the means to achieve that goal have been altered or clarified as time has passed.

In the ESEA reauthorization of 1968 (the Bilingual Education Act) there was an accountability system for states that have English language learners; however, nearly 40 years later in 2002 NCLB completely changed how these students were educated, tested, and accounted for. Since the authorization of NCLB, there have been gradual changes or clarifications made to Title III to improve the law as well as scrambling among states to adhere to the rules yet maintain their own autonomy in how their education agency is run (Gándara & Baca, 2008). This tinkering might include educator-friendly guidelines for staying in compliance with the requirements of the law, clarification of the policy aims, looking at state plans for implementations, and reconfiguring an accountability system.
within Title III of NCLB.

When the Elementary and Secondary Education Act was reauthorized as No Child Left Behind, Title VII of ESEA (also referred to as the Bilingual Education Act) was changed to Title III of NCLB (National Association of Bilingual Education, 2009). Further, what was once a competitive grants system turned into an entitlement of funds based on the enrollment of ELL students. At the initiation of Title III, there were no clear guidelines regarding how money was spent. Since that time, the mandates of NCLB have developed as schools simultaneously adopt the policy and adapt their current practices.

The policy burst and the gradual tinkering with Title III of NCLB is shown in the timeline below with the initiation of NCLB being the disequilibrium burst and the following events representing the gradual development and defining of the law.

*Evolution of Title III of NCLB adapted from (OELA, 2008)*

- 2002: NCLB becomes a law (Policy Burst)
- 2003: The Department of Education releases a guide on Title III accountability
- 2003-2004: States are required to begin reporting Annual Measurable Achievement Objectives (AMAOs) and hold districts accountable for AMAO performance
- 2005: The Department of Education monitors the state’s implementation of Title III
- 2007: Some states are held accountable for not meeting ELL AMAOs and the Department of Education requires that they restructure
- 2008: The Department of Education issues a Notice of Final Interpretations
(Office of English Language Acquisition, 2008) outlining the Department’s interpretation of Title III

- 2009-2010: States’ AMAO targets and definitions are required to be consistent with the Department’s notice of Final Interpretations

Years after NCLB became a law, policy officials are still refining implementation. These periods of incremental change may lead to ambiguity and uncertainty among those trying to implement the policy (Weick, 1995). The concept of punctuated equilibrium suggests that soon there will be another massive overhaul and the law will be renamed, reconfigured, and there will be a shift to comply with the new laws in states and local education agencies.

**Policy impacting states.** As mentioned in chapter one there were several policy evaluations released by the Department of Education to better account for and understand Title III implementation. Ramsey and O'Day (2010) focused on how states were implementing the provisions in Title III of NCLB and summarized states’ actions including the benefits and the challenges of the program. Boyle, Taylor, Hurlburt, and Soga (2010) collected data from external sources and other reports published by government agencies and focused on how states are being held accountable for the provisions they have implemented. This policy brief details how only eleven states met their Title III goals, however certain districts within ‘fail’ states did meet their goals. Tanenbaum and Anderson (2010) provide a more in-depth look at how states are using Title III funds, and how implementation/accountability is working by using a more qualitative methodology for collecting their data. Data for this were collected through
telephone interviews with state and district level officials in six states, along with archival data. These authors found that although there are benefits of Title III accountability practices such as heightened awareness among schools, an emphasis on identifying and grouping students accordingly based on their English proficiency level and better professional and technical assistance for educators, there are also some negative aspects. These include finding staff that are qualified to teach ELL students, individual schools taking responsibility for their students, and lack of adequate funding.

Along with the policy briefs mentioned above, Cook, Linguanti, Chinen, and Jung (2012) provide insight into Title III accountability on the national level and provide qualitative data from a select group of states. Their report focuses on accomplishing three key objectives: describing the progress of implementing Title III across states, looking at the programs that states have in place to address the needs of their ELLs, and maintaining focus on the diversity of ELL students as a whole. According to this report, the way ELL students are identified differs in every state, the assessment or evaluation of academic and English performance varies from state to state, and there are a variety of ways these youth are educated. Further, these students’ accommodations are not consistent. States reported that there is alignment between state standards and limited English proficiency standards; however, there is variation in the annual measurable achievement objectives (AMAO) that states are required to meet. There is variability between states with respect to how students are identified and how they are serviced, and possibly there is variation among districts within one state.

The AMAO provision within NCLB not only sets goals for school districts
regarding these students, but it also allocates money to help the districts meet those goals. Though the AMAOs are similar to the expectations from Title I, states that do not meet them do not receive additional monetary support to help them reach their goals. Instead, after two consecutive years of missing goals, they are put on an action plan for improvement. “Only 10 states met their state-level AMAOs for the 2008–09 school year, but at the district-level, 55 percent of Title III districts nationwide reported meeting their AMAOs that year” (U.S Department of Education, 2012b, pg. 75); demonstrating the uniqueness of each district in their ESOL programs, and the variability among districts within states.

**Policy impacting practice.** Policies, initiatives and implementations impact instruction and student learning eventually. Although there is a long history of educating English language learners in the United States, there are still many questions regarding which instructional methods work best and how to accommodate the various languages, educational backgrounds, and cultures that exist within the ELL context. Further, schools must account for the training and professional development of teachers for each of these types of pedagogical practices. Some school districts report problems staffing teachers for ELL students that meet the highly qualified requirement of NCLB (Clewell, Cohen, & Murray, 2007). Methods of educating ELL students are still a matter of debate in the education arena and there are a variety of methods being used at this time in Virginia.

According to the Office of English Language Acquisition, Language Enhancement, and Academic Achievement for Limited English Proficient Students (2012), Virginia schools use a variety of English-only language instruction educational programs such as
structured English immersion, sheltered English instruction, content-based ESL, and pullout ESL. Virginia has also incorporated two-way immersion, transitional bilingual, dual language instruction, and developmental bilingual and heritage language instruction in some of its districts. “This wide range of programs in turn results in widely varying levels of improvement in English proficiency and in academic achievement among the U.S. ELL population” (Cortez & Villarreal, 2009 p. 10). There are many methods of educating these students yet the best way has yet to be determined. There are many different types of programs across the state and even within single districts. For example, bilingual education is a very popular method of language instruction because it harnesses the students’ strengths in their primary language and incorporates learning a new language while learning the necessary skills and content required by schools. However, the problem with bilingual education programs is there are so many different languages present in schools that attempting to enforce a bilingual model such as Spanish-English instruction (Spanish being the dominant language present in many school districts) would lead other language minority students to be isolated further. In Radcliff School District (the pseudonym for the school district in this study) for example, there are over one hundred languages present in the K-12 schools (Virginia Department of Education, 2012a). Attempting to educate all of these students in their native language would be impossible.

Due to the rapid increase of ELL students in the Radcliff area and in Virginia as a whole, it was necessary to hire more teachers who could work with these students to provide the education necessary to help them achieve their English proficiency and
mastery of content. It is estimated the “high LEP (Limited English Proficient) schools face more difficulty filling teaching vacancies and are more likely to rely on unqualified and substitute teachers than schools with few or no LEP children” (Cosentino de Cohen & Clewell, 2007 p. 4). Likewise, it may be that those who are hired are new to their profession and therefore inexperienced with meeting the demands of students who are underperforming their mainstream counterparts. Deployment and development of human resources to meet the growing needs of ELLs has considerable financial implications for schools and school systems.

**Funding**

It is important to know what happens to English language learner funding to see if money is impacting student achievement. District and school leaders’ decisions matter when it comes to how funds are used, how resources are distributed across the district, and how they are used within schools.

Federal policies currently place unprecedented demands on school district central offices to use a range of sources of “evidence,” “data”, and “research” to ground a host of decisions related to how central offices operate and how they work within schools. (Honig & Coburn, 2008, p. 580)

How this contributes to or influences decision outcome is unknown. Odden and Clune (1995) argue that poor resource distribution is a reason for low productivity in schools. Further, they advocate for greater equality in resources/funding across school districts, and for site-based management. Learning about resource distribution at the local level will determine if there is equality in funding across the school district and how site-based
management plays into the decision processes at the school district in this study.

Odden and Achibald (2000) suggest leaders must recognize a need for change in a program or a service, determine what should be changed about that program or service, and then create a strategy to implement that change. In looking at the implementation of supportive programs for immigrant students, Chu (2009) states that “school leaders need to consider the following to meet immigrant students’ needs: what approaches or programs should be included, what supporting services should be provided and what factors school leaders should consider in implementing a program” (p.69). For example, leaders need to look at all aspects of available options to find out what meets the needs of the English language learners in their district and schools before they make decisions regarding funding. Moreover, they must communicate with each other to learn what the needs are in each school.

Most education research regarding use of funding is focused on outcomes and productivity, not necessarily on the process of decision making itself (Hanushek, 1986; Hanushek & Lindseth, 2009; Marion & Flanigan, 2001; Odden & Archibald, 2000; Odden & Clune, 1995). This study seeks to complement what has already been done in education research and evaluations by providing empirical evidence about what is happening at the district level as decisions are being made.

**Funding for ELLs.** In a study comparing two schools within the same school district in California with diverse learners, Jimenez-Castellanos and Rodriguez (2009) found that decisions regarding the budget and actions by the school leader had a direct influence on ELL student achievement. The study sought to contribute to the discussion
regarding school finance and how the allocation of fiscal and personnel resources shape student performance. The authors call for more research regarding policy implementation at the district level and how educational responsiveness could improve performance. Using money for maximum impact on students helps accomplish that goal.

In a similar study, Jimenez-Castellanos (2010a) aimed to answer how educational resources were allocated among schools within a large district based on student demographics, if these resources were related to student achievement, and what role resource variation played in academic achievement among and between Title I and non-Title I schools that do or do not meet their adequate yearly progress goals. Positive correlations between funding and student achievement related to such things as higher teacher salary (thus more experienced teachers), higher attendance rates, newer schools, multi-purpose space, and fewer portable classrooms were found. Schools that received federal funding were given more per-pupil funds than schools that did not receive federal funding, but those schools that received less money received more hidden funds such as donations and other resources from parent boosters. This too indicates that how money is spent matters for students who typically underperform compared to their peers.

Han and Bridglall (2009) looked at the academic trajectories of ELL students in grades kindergarten through five and their relationship to resources. The study found that ELL students started kindergarten with reading and math skills well below their English-only speaking peers yet they were able to narrow the achievement gap by fifth grade to some extent based on the resources they received. The data suggest that strong school leadership, parent involvement/participation, teacher effort (planning, collaboration,
curriculum development), and physical resources help boost student achievement.
Because this study was conducted based on national data, it is hard to distinguish specific
information such as what parental involvement looks like, or which resources were
purchased for optimal effect.

**Conceptual Framework**

The review of literature outlined above showcases both the importance and
significance of funding for ELL students. The conceptual framework provided a
structure and acted as an organizational tool throughout data collection, coding, and
reporting processes. The conceptual framework guiding this research draws upon the
theory of decision making in order to understand the process school district leaders go
through while distributing federal money for ELL students, including how they make
sense of Title III policy or understand the policy they are implementing.

Policy is written with the intention of it being implemented in a faithful manner,
that is to say, policy is written with a goal in mind. The No Child Left Behind Act was
predicated on the Rational Actor Model (Allison & Zelikow, 1999), i.e., there are
specified goals defined with accountabilities, and the assumption is that states and
districts will make optimal choices on how to deploy resources to reach the pre-defined
goals. However, decision making within an organization is a complicated and convoluted
process that sometimes involves singular actors and other times involves multiple
stakeholders (March, 1994). For the purpose of this study, I focus on decision making
through the lens of rational systems because “rational theories of choice assume decision
processes that are consequential and preference-based” (March, 1994 p. 2). Decision
making theory such as the Rational Actor Model (Allison & Zelikow, 1999) provides a starting point from which to understand the flow of federal dollars for ELL students through the school district. By examining the goals of the district and its schools, how leaders in charge of spending federal dollars for ELL students make their decisions, and what those decisions are, the process of decision making as it relates to Title III funding and school system’s use of money becomes clearer.

Espoused Goals

When viewing a public school bureaucracy from the rational systems perspective, “[they] are collectivities oriented to the pursuit of relatively specific goals and exhibiting relatively highly formalized social structures” (Scott, 2003 p. 27). The school district in this study has goals defined in the superintendent’s strategic plan for education which includes vague goals for ELL students such as decreasing the number of ELL students who are identified as special needs students and increasing the number of ELL students participating in specialty and gifted programs (Radcliff School District, 2013a) however ELL academic or English language proficiency goals are not mentioned. The district has goals dictated by two higher government entities of the state and federal government that they must also address. “[The] ultimate goals of an organization are somewhat vague and imprecise…such general goals in themselves provide few clues for guiding behavior of participants” (Scott, 2003 p. 51). Although there are over-arching goals from the federal government as defined by Title III, the actual goals of the local education agency are less specific and it is assumed that they are working to accomplish the goals of Title III in addition to their own.
The nine goals of Title III are defined in the NCLB legislation (No Child Left Behind Act, 2002) but become less explicit at the state and local level. The goals of Title III in the No Child Left Behind legislation are as follows:

1. Help students obtain English proficiency
2. Help ELL students obtain academic achievement
3. Provide high quality language instruction to educational programs
4. Prepare ELL students to enter into English-only institutions
5. Establish, Implement, and sustain ELL programs
6. Promote parental outreach and community participation
7. Streamline English learning and content learning
8. To hold states accountable in the increase of English proficiency, and maintain Adequate Yearly Progress (AYP)
9. Provide states flexibility to implement language instruction educational programs based on research (adapted from the No Child Left Behind Act, 2002 p. 266).

The goals of Title III and the means by which to accomplish them are open to interpretation and different people and governmental entities understand them in different ways. In the Rational Actor Model, the decision maker is trying to meet the predetermined goals in the way that is value-maximizing; that is to say, in the way that will be the most cost effective, have the highest return on investment, or accomplish the goal in an expedited timeframe.

The goals of Virginia’s Department of Education programs supported by Title III funds intend to solve or minimize the disparities between non-English speaking students
or immigrant students and their peers that arise because of the language barrier, yet they are not explicitly listed. States must report the number of students receiving ELL services, scores of English proficiency tests, accommodations students are eligible to receive, scores on state mandated standardized tests, and more. School districts report to the state, and the state reports to the U.S. Department of Education. The hope is that by helping students obtain English proficiency, students will be better prepared and equipped to have a successful experience in schools.

The policy goals outlined by the Virginia Department of Education as they relate to ELL students and Title III spending are not entirely clear, though they are in line with federal expectations (Virginia Department of Education, 2012b). Additionally, the state establishes annual measurable achievement objectives that each district must meet. These measure progress in learning English, attainment of English proficiency, and performance toward meeting annual measurable objectives in reading and mathematics (Wright, 2013). The goals of the district related to ELL students and the use of Title III money are listed in a vision statement cited on the webpage (Radcliff School District, 2012) but not explicitly stated or connected to state AMAOs.

**Decision Making**

The Rational Actor Model (Allison & Zelikow, 1999) has four core elements that guide decision making processes for leaders. The first element is the goal of the individual (or in this case, the school district) and focuses on what is supposed to be accomplished through the decision. The second element explores alternatives or the options the rational actor must choose in a particular situation to accomplish said goal.
Third, the consequence to each alternative is weighed so that the best possible result can be identified. Finally, a decision is made based on the value maximizing option, meaning the option that will best accomplish the goal by spending the least money, resulting in expedited completion, meeting a political agenda, etc. In theory, the RAM would be an ideal process for leaders because all possible alternatives are known and there are not necessarily limits on time or money. In the RAM, ultimately, the best choice is made and the organization meets its goals.

Governmental organizations including school districts are faced with making decisions with limited information and tight schedules. Below is a diagram reflecting the Rational Actor Model as it relates to ELL students and Title III funding. Each level indicates the steps within the Rational Actor Model from looking at the goals, to considering alternatives to selecting a method of accomplishing those goals. The arrows in the diagram indicate the process that actors go through when making these decisions.
Figure 1. Rational Actor Model as it applies to the Title III fund decisions.

Though this model may work in theory, March (1994) argues that it is not necessarily accurate in practice. Individuals create a rationale for their decisions and try to support that rationale by claiming they acted in a rational manner. “Rationality is the set of skills or aptitudes we use to see if we can get from here to there- to find courses of action that will lead to the accomplishments of our goals” (Simon, 1993 p. 393).

Nevertheless, the RAM can be used as a lens for looking at the decisions of ESOL district leaders to examine the process of how they are faced with meeting goals, how they weigh their options and how they decide to spend money. Additionally, it can provide a starting point for looking at imperfections with the model and what might happen when
something goes awry.

School district leaders are tasked with understanding, adhering to, and applying education policy by distributing funds and services throughout the school district. They make decisions that they believe will accomplish the goals of the organization. “Although decision makers try to be rational, they are constrained by limited cognitive capabilities and incomplete information, and thus their actions may be less than completely rational in spite of their best intentions and efforts” (March, 1994 p. 9). Title III assumes a rational choice process, i.e., money is given to states, who are expected to distribute it rationally; money is distributed to districts, who are expected to make value-maximizing decisions to help students. However, humans are fallible and as such they can only make decisions with the information that is available at that time.

**Bounded Rationality**

March (1994) uses the concept of *bounded or limited* rationality to explain the decision making process and argues that there are many unknown elements which can make it difficult to select the best possible choice when making decisions. Risk and uncertainty, incomplete information about alternatives, and complexity cause rationality to be bounded (Simon, 1972). Other restrictions on rationality may be time, memory, and communication within the organization, leading to even more difficulty selecting the best possible means to achieve organizational goals. “There are limits on our knowledge, … ability to compute, to work out the consequences of what we do know…there is a further problem because final values themselves are not subject to a rational calculus, they are simply posited” (Simon, 1993 p. 397). The process of decision making is assumed to be
a rational process but because of bounded rationality the process is constrained.

The rational systems perspective (Scott, 2003) helps to explain the school system and the process of decision making itself by examining each part of the process of how decisions are made, as they are being made. The participants, no matter how well informed, will always have some sort of constraint on their decision making ability such as incomplete knowledge, limitations of time, or simply following a routine. The goals that the decision maker is trying to accomplish may be inconsistent or ambiguous so that he or she really is not sure of what it is the organization wants. The means by which to accomplish these goals or the guidelines themselves may be unclear, and leaders are forced to negotiate the way in which they accomplish their goals. As discussed above, sometimes not all the information is known to decision makers as they are tasked with problem solving. Sometimes decision makers are limited in the information they have access to and therefore might have chosen differently had they had unlimited access to and ability to understand information.

Problem solving is also somewhat routinized within organizations and people act how they are expected to, rather than making decisions for themselves (March & Simon, 1993). Further, as in most organizations there are limitations on time, and leaders are sometimes forced to make a decision although they are not completely confident that it is the best alternative. Bounded rationality “recognizes inescapable limitations of knowledge and computational ability of the agent” (Allison & Zelikow, 1999 p. 20). In other words, decision making does not always happen as the Rational Actor Model portrays, and oftentimes there are factors that play into the process that act as an
impediment. Sometimes decision makers do not or cannot consider all possible alternatives or consequences in selecting a certain alternative. “Finding the optimal alternative is a radically different problem from finding a satisfactory alternative” (March & Simon, 1993 p. 161). Decision makers must make a decision that meets the need at the time. “Instead of considering the ‘best possible’ action they search for an action that is ‘good enough’” (March, 1994 p. 9).

The Rational Actor Model assumes that the decision outcome will have a maximum impact on an actor’s utility function in terms of accomplishing the goal. However, often times the decision maker will simply choose the alternative that is ‘good enough’ or one that meets an immediate need although it may not be the best choice. This process is called satisficing. Satisficing involves “choosing an alternative that exceeds some criterion or target” (March, 1994, p. 18). The decision maker will make the selection based on looking at alternatives until one is found that can accomplish the goal in mind but is not necessarily the best possible choice. Below is the Rational Actor Model as it is influenced by the limitations of bounded rationality and satisficing.
Reconciling Ambiguity: Sensemaking

The Rational Actor Model (RAM) presents a systematic approach that allows organizations to operate in a value-maximizing way (Allison & Zelikow, 1999), that is that ESOL program leaders are making their decisions after careful consideration of outcomes and after carefully weighing means and ends based on abundant and decipherable information. According to the Rational Actor Model, the goals of the organization are known before options are considered, yet in Radcliff School District the goals are either unclear or change periodically.

Figure 2. Rational Actor Model influenced by elements of bounded rationality and satisficing.
As noted earlier, theory also success that in practice, leaders are unable to be as rational as the RAM suggests due to complications that arise in the decision making process and because information flow is seldom perfect; put simply, it is atypical for decision makers to have all of the information they need in a timely fashion, and the quality of the information that is available varies. Further, goals sometimes contradict or interfere with rational choices leaders try to make. How school leaders understand Title III policy and the steps that schools leaders go through to implement policy play a role in the decision making process. The distribution of Title III funds throughout the school district must be understood by examining how these leaders make sense of the policy that dictates their practice and the decisions that follow.

School leaders must make sense of the policies regarding the allocation of funding as they make their decisions. Further, school leaders must understand the rules, regulations, and organizational norms that guide their decision making processes and consider various influences that can affect the decision. Examining leaders’ sensemaking is the first step in understanding the decision-making practices of school officials because it explains why leaders act a certain way. “By nature, sensemaking is incremental, fluid, and recursive” (Datnow & Park, 2009 p. 351). Policy is deciphered and described for laymen and sense is made from the legal jargon and broad descriptions created by politicians and lawmakers. “Because sense-making occurs in a social context and is shaped by interactions at various levels and groups there can be different interpretations of the same message even within a single organization such as a school” (Datnow & Park, 2009 p. 351). Although there is one Title III policy, there may be many
interpretations of that policy as the people who must enact it make sense of the ambiguities, inconsistencies and constraints created by other actors involved in the process.

ESOL program leaders must make sense of the Title III federal policy. They must understand what is meant by the goals of this policy and also the guidelines for how federal money can be spent, they arrive at their own sense of the goals, procedures, and purposes of the act. They make their allocation decisions based on their own sensemaking, presumably within policy guidelines and organizational goals. Taking stock of leaders’ sensemaking during enactment is thus critical to understanding the implementation process and, ultimately, the effectiveness and utility of Title III itself. Ultimately when making sense of the policy and making sense of their decisions school district leaders have to justify those decisions to explain why they did what they did.

**Understanding Decision Choice: Logic of Appropriateness**

There are differences among districts within the same state in how Title III money is spent; each school district has discretion over how they use their Title III funds. Recent evaluative reports released by the federal government regarding Title III funding and implementation (Boyle, Taylor, Hurlburt & Soga, 2010; Ramsey & O'Day, 2010; Tanenbaum & Anderson, 2010) found disparities across the states and districts with respect to how students were being identified and reported, how money was being spent, differing goals of the states and organizations, and the differing types of program services students are offered. These reports demonstrate that there are differences in how states and local education agencies are spending their money, but what it does not provide are
reasons why. States and districts are challenged in meeting the criteria for the English language learners and may even be confused with how to best meet the goals of the policy (Cook, Linguanti, Chinen, & Jung, 2012). This may be due to a number of factors such as the influx of ELLs in that state, the existing programs in place, and the necessity to be frugal with the limited funds available for this subgroup. Unclear expectations along with limited information shared with and among school leaders lead to non-value-maximizing decisions.

In addition to following goals and procedures dictated by the federal or state governments, local decision makers may also be adhering to the norms of the organization. The rules and routines of the organization, the role of the individual or of the ELL program and the identity of the decision maker may play into evaluating decision criteria. March (1994) refers to the logic of appropriateness as a description of rational choice that focuses more on the identity of the decision maker and what the organization expects of that person rather than the logic of consequences, which focuses more on the effects of decisions. In other words, the decision maker does what is expected of him or her and not necessarily what will yield the best result.

Logic of appropriateness implies a decision is appropriate because it fits with the political nature, norms, or atmosphere of the school district. When the participant or rational actor makes decisions to meet a goal, it is possible that he or she makes that decision to accomplish the task at hand based on established norms or routines and to meet a role expectation, rather than any rational weighing of decision alternatives. School leaders may be making decisions in order to satisfy requirements and get the job
done without thinking about how decisions could be modified to better meet the needs of the schools and students (Scott, 2003). The goals of the organization are ambiguous and conflicting so the decision maker is forced to satisfice to meet the goals. An example of satisficing and following logic of appropriateness comes from the ambiguity embedded in budget management. The budget for the school district is written almost six months prior to the start of the school year in which it will be used. School district leaders may not yet know the needs of the schools, the enrollment of students, or how much monetary support will be given from the county based on tax revenue. With the limited information they have, with deadlines looming, and uncertainties regarding how much money will be spent, decisions have to be made, and they are often made based on a logic of appropriateness rather than of a careful analysis of alternatives.

**Conclusion**

The decision making process and how the Director of ESOL makes sense of education policy as it relates to distribution of federal funding and English language learner education is a critical factor within this study. The conceptual framework of rational decision making described thus far can help us understand this process better. By recognizing the desire to make rational decisions and the reality of being limited in the ability to do so, we can look at the utopia of Rational Actor Model and the reality of bounded rationality, the process of sensemaking, and the impact of norms and routines on decision choice. While the Rational Actor Model and established Title III policy, assume that the decision makers have all the information, time, and power to meet their goals, because of uncertainty, ambiguity, and limitations, district leaders are bounded in their
ability to do so. An added complexity in the decision-making process is that school leaders are having to make sense of the policy that dictates what their goals are, and how they are supposed to meet them; the sensemaking process goes unaccounted for in expectations related to implementation of evaluations of the effectiveness of policy.

The framework above depicts the elements related to Title III funds allocation through the lens of decision making. The Rational Actor Model has elements that can be used to explain the decision making process, but challenges play into that process, creating confusion. How school leaders understand federal and state policy regarding the education of English language learners influences the decision making process and the means, or methods, employed to meet the goals set forth by the organization or individual.

In the chapters that follow, the decision making process used by school leaders in a school district in Virginia regarding the allocation of Title III funds is examined. The decision making process is looked at and analyzed through the lens of the Rational Actor Model, augmented by the perspectives gained by applying the concepts of bounded rationality, sensemaking, and logic of appropriateness to better understand decision choices.
This qualitative case study took place during the 2013-2014 academic year in the Radcliff School District. The study includes interviews, review of archival data, and observations in order to answer the research questions. The purpose of this section is to describe the research context and methods used to collect and analyze the data. This study answers the following research questions:

1. How do Radcliff School District central office leaders make sense of Title III policy?
2. What factors contribute to the decision-making processes of Radcliff School District central office leaders regarding the allocation of funding for ELL students?
3. How is Title III federal money allocated within Radcliff School District for English language learner education programs?
   a. What is Title III money spent on?

**Research Design**

I chose to use a descriptive case study design because the focus of the study was a specific issue within Radcliff School District that needed to be identified and explained (Merriam, 2001). A descriptive case study allows for a descriptive and realistic analysis of the phenomena studied within a particular context. “Looking for the critical case is
particularly important where resources may limit the evaluation to the study of only a single site… the site that would yield the most information and have the greatest impact on the development of knowledge” (Patton, 2002, p. 236). A case study design is employed to gain an in-depth understanding of the situation and meaning for those involved. Although the findings of the study are significant to Radcliff School District, they are also valuable for others to gain understanding of the phenomena so they can learn from the case and perhaps apply some principles to their practices and illuminate a particular issue (Creswell, 2008). In a case study such as this, “the interest is in the process rather than outcomes, in context rather than a specific variable, in discovery rather than confirmation” (Merriam, 2001 p. 19). The phenomena in question is the decision making processes that revolves around Title III funding in one school district. Qualitative methods such as interviewing participants, observing meetings, and reviewing archival documents are the best possible way of answering the research questions because they involve not just the results of decision making but an examination of the process itself.

Understanding the meaning of events, situations, experiences, and actions of the participants; understanding the context of how participants act; identifying unanticipated phenomena and understanding the process by which events and actions take place; and developing an explanation are intellectual goals that help justify the purpose of using a qualitative method of research (Maxwell, 2005). For this study, I drew from three different areas: participant interviews with a set of semi-structured interview questions, observation of the budget process and leadership meetings, and the examination of
documents regarding expenditures for ELL programs and materials. Through the collection of qualitative data, I was able to learn about what is happening in this school district with respect to Title III spending and tell the story of resource allocation through the lens of an outsider.

This is a case study of how school leaders make decisions about funding for English language learner education. School leaders spend money in accordance with federal regulations and guidelines, yet how they make those decisions is unknown. This study describes how a small number of school district leaders influence a large number of people through their decisions.

**Setting**

This case study takes place in Radcliff School District (RSD), the pseudonym given to a large suburban school district in Virginia. The school district, the schools, and the participants in this study have all been given pseudonyms as a way of protecting their anonymity, though the demographic information is accurate. This school district has over 85,000 students, making it one of the largest school districts in the state (Virginia Department of Education, 2011). According to the Virginia Department of Education (2011), during the 2013-2014 academic year, there were over 18,000 ELL students enrolled that make up approximately 21% of the school-age population. This school district has seen a steady growth of ELL students that reflects the growth of ELL students in many school districts in Virginia.

Radcliff School District has site-based management at their schools and in their central office, meaning that decisions are located within the department they impact.
Schools and departments are responsible for themselves in terms of budget decisions, staffing, resource allocation, though they do submit their plans to an associate superintendent to review, approve, and/or amend to ensure alignment and compliance with (Radcliff School District, 2013b). Site-based management is supposed to give more autonomy to school leaders to make decisions that will benefit specific populations.

“Since a system of uniform centrally-determined allocations generally fails to satisfy the instructional needs of all students, a system which enables schools to receive resources according to their precise mix of student needs should provide more comparative advantages” (Radcliff School District, 2013b p. 8). Although this may seem contradictory, in Radcliff School District budget decisions of federally supported programs are made at the central office level. For example, decisions made regarding Title III funding are made within the ESOL department at the central office. In this context, the term site-based extends to the individual departments at the central office level, as well as to the schools.

Participants

Participants in this study were selected based on purposive sampling, using the job title and role they hold in the school district (Creswell, 2008). I selected participants who were in leadership positions at the central office level who work in or with the ESOL program office. I also selected three principals from each level (elementary, middle, and high school) to interview at schools that have high proportions of ESOL students enrolled in their programs. A high school ESOL department chair was interviewed formally using an interview protocol but was unable to provide detailed responses due to her limited
experience with Title III, while other department chairs (elementary and middle level) within the county were interviewed informally at observations and their ideas or comments were transcribed. Using purposive sampling allowed me to develop an understanding of the topic by gaining useful information about the experiences of participants, who all work with high numbers of ELL students and should be informed of Title III policy and funding.

Criterion sampling is a form of purposive sampling that is used to “review and study all cases that meet some predetermined criterion of importance” (Patton, 2002 p. 238). The criteria for those interviewed were job descriptions or roles that included making decisions about federal, state, and local funds. Specifically, I interviewed nine participants who work at the school district central office or within schools. These district-level and school-level administrators were selected to be interviewed because they met the criteria listed above and have information to share regarding how Title III money is used within the district. Due to the limited number of people who are involved with the Title III funding process, I was unable to interview more participants. Even so, not all participants interviewed were able to provide much information, thus the difference in length of interviews for each participant. These participants told me about their responsibility and their input in the decision-making process. Although the principals may not be able to spend the Title III money directly; nevertheless, it is important to know about their involvement in the decision-making process and to learn what they know about Title III impacting their schools.
During the interview process I asked if participants recommend that I speak to anyone else that may be able to answer my research questions. This “snowball” or “chain” (Patton, 2002 p. 237) sampling could have provided valuable additions to my data that otherwise might have gone unnoticed; however, no additional interviewees or participants were suggested, probably because the number of central office leaders involved in the process is small to begin with. According to Patton, “there are no rules for sample size in qualitative inquiry” (p. 244), and thus I selected the participants whom I thought were necessary to answer the research questions. Because so few people are involved in the grant writing and decision making process, it was not necessary to interview more.

**District-level Administrators**

The district level administrators interviewed in this study were the Associate Superintendent for Student Learning and Accountability, Director of ESOL, Administrative Coordinator, the ESOL Bookkeeper, and the Supervisor of English Learner Instruction. These participants are district leaders who are responsible for communicating and coordinating with school principals to ensure that each school is meeting district goals and complying with federal and state policy regarding the education of these students. These participants were selected because as school district leaders with varying titles, it was assumed that they all had valuable input and insight regarding the decision making process of Title III funding, as well as a deep understanding of the policy itself.

**School-level administrators**
School principals were selected for this study based on the enrollment of ELL students in their schools. School principals may not have a say in how the money is distributed within the school district; however, their input provides valuable supporting evidence as to how Title III funds are used by the schools. One principal per level (elementary, middle, and high school) was selected to participate in this study. The school data profiles as of October, 2013 indicate that Oliver High School has an ELL population that accounts for 18.1% of the total student body, Starr Middle School has 29.9% of their population classified as ELL students, and in Radford Elementary School, 61.1% of the student population is made up of ELL students (Radcliff School District, 2013c). The high school and middle school selected have the highest percentage of ESOL students enrolled at their levels, and the elementary school has the third highest percentage of ESOL students enrolled compared to other schools within the school district. These students come from all over the world and are at varying levels of language proficiency. I thought it was important to include an elementary, middle, and high school in this study so that I could learn how the different school levels may manage or receive goods and services from Title III and how that impacts the students or the school site.

**ESOL Department Chairs**

Department chairs often have the ability to make budgetary decisions with money provided by the principal for that department, purchase instructional supplies and materials for ELL students, and provide information to the principal and district officials regarding the needs of the department. Although their budget comes predominately from
local and state dollars, they still have a voice and an opinion regarding how money is spent. One department chair was interviewed privately using the interview protocol but was unable to provide much information, and responded to most questions in one word answers. Other department chairs in this school district were observed at their leadership meetings throughout the school year and two were informally interviewed regarding Title III funding processes. It is highly recommended that all department chairs attend these meetings, though attendance varied from meeting to meeting. I sat in on these meetings and observed five district-wide ESOL department chair meetings throughout the school year. By listening and observing the actions and discussion during these meetings, I learned whether department chairs are included in the decision making process regarding Title III funding and their understandings of Title III policy.

Data Collection Methods

I collected a variety of data to learn about funding and the actual use of money designated for ELL students. I collected and used data from the 2013-2014 academic year and also discussed several issues with participants that would impact funding during the 2014-2015 academic year. I interviewed participants first and at those initial meetings I collected some archival data that participants were willing to share such as emails, forms, and budget documents. I observed meetings as they were scheduled and based on my availability. If there were follow-up questions for the participants after I looked over documents or observed the meetings, I either requested a second meeting, or asked for clarification via email. This follow-up interaction was on an as-needed basis.

Interviews
The initial interviews lasted from just over 3 minutes to over an hour based on who the participant was and how detailed their responses were to the questions. The interviews took place throughout the 2013-2014 academic year. All interviews were semi-structured in design to allow for the participant to expand on and explain in detail information regarding the funding process. The length of the interviews varied significantly based on how informed the participant was on the topic. Some participants were only able to give one word or short responses to questions because they had so little involvement in the decision making process or an unclear understanding of Title III in general (see Appendix B). A structured interview is one that asks participants to answer questions from a list of options (Willis, 2007). I used an interview protocol (see Appendixes C and D), with the ability to ask the participants follow-up questions if needed in order to ensure consistency in the interviews. Probes and detailed follow-up questions were used to obtain specific information and get clarification from the participant (Glesne, 2006; Patton, 2002).

I interviewed the participants individually to maintain confidentiality and because those who currently have leadership positions within the school district such as central office employees, principals, and department chairs provided unique perspectives. They helped me see the process through the lens of a participant and actor—someone who deals with decision making almost every day. I was able to get a more accurate understanding of their individual perspectives whereas during group interviews the narrative might have been jeopardized by group dynamics and it may have been harder to gain honest opinions and experiences. I conducted follow-up interviews or emails for
some of the participants if I needed clarification about what was discussed in our meetings, but these were on an as-needed basis and were less structured.

Kvale (2006) writes about the power dynamics in research interviews and the roles of the interviewee and interviewer. I was the one asking the questions and directing the conversation; however, the participants still dominated the conversation by speaking freely and elaborating on each answer. They had information that I sought and were therefore ‘gatekeepers’ of valuable data to which I needed access. Kvale outlines the ‘rules’ for a research interview and reminds us that interviews need not be so one-sided. Although I was the one conducting the interview, the participants helped me by providing answers to my questions.

**Interview questions.** Participants were asked a set of interview questions based on their position and their role (see Appendixes C and D). Participants were given an informed consent sheet prior to the interview so they were aware of the research and what it entailed (see Appendix E). I began each interview by asking the participants about their educational experience and their years of experience within that particular role.

“Experience/behavior questions are generally the easiest ones for a respondent to answer and are good places to begin to get the interviewee talking comfortably” (Glesne, 2006 p. 82). I asked questions that relate specifically to the research questions but also that address the conceptual framework of rational decision making theories such as “how do you make sense of Title III policy?”, or “are you able to successfully meet the needs of ELL students with money from Title III?”. I always concluded the interview by asking if there is anything more participants want to share or anything that they thought I should
have asked them. This last technique was to persuade them to share personal opinions and to address anything they feel was left unquestioned. The principal purpose of the interviews was to directly address the research questions from a variety of participants. The interviews were audio recorded and later transcribed. The transcriptions were sent to the subjects to be approved for accuracy and to give the participants a chance to clarify statements or change text that they were uncomfortable with, also called member checking (Cresswell, 2008). After the participants approved the transcriptions, the text was coded and analyzed.

Observations

According to Creswell (2008), observations are the process of gathering information by observing people and places at a research site. I observed a variety of meetings among the administrators at central office and between principals and department chairs. In Radcliff School District principals meet regularly as a group and are often briefed about certain issues and policies within the district. It is at some of these meetings that ESOL administrators at the district level and principals come face-to-face to discuss issues pertinent to ELL education. Two of these meetings were observed. Additionally, department chairs meet regularly with representatives from central office to discuss policy, operations protocol, and money. Five of these meetings were observed. It is at these meetings where new information is disseminated and certain decisions are discussed. The ESOL leadership team that worked closely with me throughout the course of this study introduced me and explained to those participants at the meetings who I was, what I was doing and copies of the informed consent for observations were offered to
participants (see Appendix F). Observations “include the opportunity to record information as it occurs within a setting [or] to study actual behavior” (Creswell, 2008 p. 221).

An observation protocol (Appendix G) was used with each observation to ensure that I was constantly looking for information that answers the research questions. In this protocol, I included both descriptive and reflective (Creswell, 2008) field notes so I have a record of what I saw and what I thought. The goal of observations is to see how participants communicate with each other and interact in their natural setting. “Observations of staff interaction and decision making processes also provide opportunities for evaluators to note things that do not happen” (Patton, 2006 p. 296). In other words, I wanted to see if the discussion at meetings matched what participants said in the interviews as a way of triangulating data (Maxwell, 2009). I focused on how the leadership team shared information and asked for input from the teachers. Several discussions, questions, and comments by department chairs were noted and added valuable data to the research study.

**Documents**

I examined the finance reports describing what was purchased and the various grant applications sent to the state requesting Title III funds. Additionally, I reviewed emails sent to principals and department chairs regarding programs and materials purchased through Title III funds. The reports accurately reflect the actions of participants. “By using a combination of observations, interviewing, and document analysis, the fieldworker is able to use different data sources to validate and cross-check findings”
I used the coding index (Appendix H) to help me analyze the documents, though the majority of documentary material I received were related to the budget and were straightforward. According to Merriam (2001), using documents as data is not much different from interview or observational data. The budget documents also provided some “quasi-statistics” (Maxwell, 2009) that shed light on money allocation across the school district in terms of which schools are getting what resources. “Quasi-statistics not only allow you to test and support claims that are inherently quantitative, but also enable you to assess the amount of evidence in your data that bears on a particular conclusion or threat, such as how many discrepant instances exist and from how many different sources they were obtained” (Maxwell, 2009 p. 245). The documentation is key because it is the piece that ties the interviews and observations together by tracking how the money is spent and therefore strengthens the reliability of the study through triangulation. The variety and richness of the data allowed me to triangulate what the participants say with what they do, and the end result. Below is a table of the research questions; including what data will be needed to answer them, who will provide that data, and the method of collection that was employed.

Table one shows the data collected, the subject who provided the data, and data collection method that was used to answer each of the research questions. This table helped me identify what needed to be done in order to answer the research questions.

Table 1
Research Questions and Proposed Data

<table>
<thead>
<tr>
<th>Research Questions</th>
<th>Data</th>
<th>Participant</th>
<th>Collection Method</th>
</tr>
</thead>
</table>

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How do Radcliff School District central office leaders make sense of Title III policy?

- Interviews, observations, copy of guidelines, grant proposal
- Director of ESOL program leaders
- Interviews, Documents, Observations

What factors contribute to the decision making processes of Radcliff School District central office leaders regarding the allocation of funding for ELL students?

- Interviews, observations, memos from the state and local education agency, strategic plan, performance goals
- Director of ESOL, Associate Superintendent for Student Learning and Accountability, Principals, Department chairs
- Interviews, Documents, Observations

How is Title III federal money allocated within Radcliff School District for English language learner education programs?

- 2013-2014 Budget information, interviews
- Director of ESOL
- Interviews, Documents

What is Title III money spent on?

- Expense invoices
- Director of ESOL Bookkeeper
- Interviews, Documents

Triangulation

Triangulation is the process of using multiple data-collection methods to contribute to the validity or trustworthiness of the data (Glesne, 2006). I wanted to see how the participants come to an agreement with each other in terms of how to use the money and if there is discussion about how the money was spent. I observed meetings and staff gatherings in which the budget was discussed for the approaching fiscal year, such as meetings between the ESOL director and ESOL department chairs or principals.

“[Triangulation] reduces the risk that your conclusions will reflect only the systematic biases or limitations of specific source or method, and allows you to gain a broader and more secure understanding of the issues you are investigating” (Maxwell, 2012 p. 106).
looked at the budget documents shared with me to determine if there was a connection to how participants described the grant writing and allocation process. “Each data source contributes] to the researcher’s understanding of the whole phenomenon. This convergence adds strength to the findings as the various strands of data are braided together to promote a greater understanding of the case” (Baxter & Jack, 2008 p. 554)

The variety of sources not only helped answer my research questions, but addressed the constructs from my conceptual framework. The Rational Actor Model and its variations helped me to analyze observations of meetings among ESOL program leaders, principals, and other stakeholders and provided insight into what takes place during the decision making process. Interviews with participants and questions that were geared toward their choices, decisions, and outcomes were of value for looking at how RAM is used and how the decision making process deviates from RAM. Throughout the study I looked for ways in which the Rational Actor Model is limited or bounded and used the observations of what does not go according to plan; interview questions that ask participants to reflect on what happened and why; and documents that show the purchase of goods and memos from the state for revisions to grant proposals or clarifications in the proposed budget plan. I observed how stakeholders understand Title III policy in the organization, specifically as school leaders such as principals and department chairs asked questions regarding Title III policy or funding and while the ESOL program leaders provided explanations. I asked interview questions related to understanding of policy to gain insight into what school leaders know, do not know, and want to know about the policy.
Procedures

Recruitment Methods and Project Timeline

I requested permission from George Mason University’s Institutional Review Board and the Radcliff School District to conduct the research, by completing the appropriate paperwork and communicating with both parties (see Appendix I). Once I received permission from both institutions, I contacted each of the participants via email to explain the purpose and intent of the study and asked if they were willing to participate (see Appendix J). If they agreed, I started gathering data via interviews. I collected data through the 2013-2014 academic year. During the spring and summer is when most budget decisions are made, as the fiscal year for schools begins on the first of July. This allowed me to see how leaders planned to spend the money, and what actually happened once the new fiscal year began. I began writing my analysis after the collection of data was complete in the summer of 2014.

Table two shows the data collection timeline for this research including obtaining permission from the research sites, contacting participants, interviewing those participants, and conducting follow-up meetings. The research timeline took place over the course of one year.
Table 2
Data Collection Timeline

<table>
<thead>
<tr>
<th>Dates</th>
<th>Steps</th>
<th>Process and data</th>
</tr>
</thead>
<tbody>
<tr>
<td>Summer 2013</td>
<td>Request permission from IRB and RSD (Radcliff School District) to conduct research</td>
<td>Submit required forms, answer questions</td>
</tr>
<tr>
<td></td>
<td>Contact potential participants and schedule meetings for initial interviews</td>
<td>Send introductory email, pursue with a phone call or visit if necessary</td>
</tr>
<tr>
<td>Fall 2013</td>
<td>Conduct interviews and begin to gather archival data, attend meetings of ventral office personnel as needed</td>
<td>Interview ESOL program leaders</td>
</tr>
<tr>
<td>Academic Year 2013-2014</td>
<td>Attend department chair meetings (one per month) and continue interviews</td>
<td>Interview principals and department chairs from selected schools</td>
</tr>
<tr>
<td>May and June, 2014</td>
<td>Conduct follow-up interviews or send emails for verification</td>
<td>Interview or email participants who can provide clarity to what was observed/read throughout the data collection process</td>
</tr>
</tbody>
</table>

Analysis

The data were sorted into categories from the location and level and then coded using open and etic coding. Open coding “relates to reading the data, and arranging it into categories that facilitate comparison between things in the same category and that aid
in the development of theoretical concepts” (Maxwell, 2005 p. 96). Etic coding uses constructs established by the researcher that the participants also mention that are crucial to the framework of the study (Creswell, 2008), in this case the concept of decision-making using the Rational Actor Model. I used codes such as individual to show when one person makes an executive decision regarding funding, organizational to show that the organizational goals impacted the decision-making process. If there was a situation in which participants were struggling to meet a deadline, the code would be time constraint which would fit into the broader theme of bounded rationality (see Appendix H for the coding index). Interviews were coded using open and etic coding. These codes helped me focus on data that are relevant to my research questions and provided some guidance when disaggregating the data. This type of open coding is what Maxwell (2005) calls substantive. “Substantive categories are primarily descriptive in a broad sense that includes description of participants’ concepts and beliefs” (Maxwell, 2005 p. 97). As I read through the various interviews, I looked for what emerged within them and also across all of them as they related to my research questions and conceptual framework.

**Interview analysis**

The interviews from all participants were recorded and transcribed. After the interviews were transcribed they were sent to the participant for final approval and to give the participant a chance to clarify or adjust anything he or she felt was inaccurate. Interviews were sorted based on the role of the participant. For example, those participants who work at central office were grouped together for the preliminary unit of analysis and principals were grouped together for analysis. Afterward, I looked at the
transcriptions to see if there were differences in codes/themes among those at the school level compared to those at the central office. I familiarized myself with the transcripts by reading them several times while making memos regarding codes and themes that were found within the text. After reading through the texts, I condensed the codes into categories that described or answered my research questions through the lens of my conceptual framework. Then I compared the categories and looked for similarities and differences among the interviewees and their responses. To report the findings I provide a narrative discussion of the codes, themes, and categories found within my data and how they relate to the research questions in Chapter four.

Observation Analysis

Field notes of the observations were taken while on site to make a record of behaviors or comments of those in the meetings, for example the expressions of the participants, the formality of the meeting, and body language of the participants as the meeting progressed. These notes were analyzed using the same open and etic coding methods from the interview analysis. This data enhanced the understanding of the phenomenon because it provided insight into the nonverbal and verbal communication that occurs between participants. However, none of the meetings observed had Title III or anything related to budget decisions on the agenda. Title III was only brought up once, when a teacher started to ask questions about it. I looked for themes and codes that emerged as I read through the observation field notes and for similarities and differences between the interviews and the observations.

Document Analysis
Documents were read and coded using the coding index for information relating to the research questions. After they were coded with the coding index, they were put into categories based on the type of document: budget documents, emails, and grant applications. There were spreadsheets of budget breakdowns for immigrant youth and limited English proficient funds (i.e., the allocation of the Title III money broken into programs/services provided); the superintendent’s proposed and approved budget; two copies of the grant application: one initial and one final; and emails from the ESOL program office to principals offering programs/professional development/services with Title III funds.

In addition, there was also email correspondence between myself and the participants in which they answered follow up questions. The codes used for the interview analysis are also applied to the document analysis, but other information discerned from the documents is more straightforward such as the allocation of money. These documents helped me understand how the money is requested and how it is disseminated through the school system.

**Validity**

A validity threat to this study is my personal bias because I am an ESOL teacher. This ties into my personal significance because as a vested member of a school community I want districts to be successful. I avoided bias and subjectivity by adhering to the interview and observation protocols and reporting data as it related to my research questions, and by using member checks. Member checks are when the participants check the accuracy of the transcriptions or provide clarifications to follow up questions. “This
check involves taking the findings back to participants and asking them about the accuracy of the report” (Creswell, 2008 p.267). I obtained access to school leaders and records from the district because of my job; however I did not interview participants from my school nor did I share who was or was not being interviewed for this study in order to maintain some level of discretion and confidentiality with the participants.

Maxwell (1992) highlights multiple forms of validity that can be used to contribute to a qualitative study. Descriptive validity, interpretive validity, and theoretical validity are used to show validity in a study but also assist with the understanding of the qualitative study. “These three types of [validity] are the ones most directly involved in assessing a qualitative account as it pertains to the actual situation on which the account is based” (Maxwell, 2002 p. 292). There is room for interpretation about what is going on and how it relates to the theories discussed above in the conceptual framework. To me, validity means accurate, logical, and consistent. If research is an accurate, logical, and consistent account of the phenomenon being studied then it is valid and should be considered high quality. Validity is used to assess what is happening from the researcher’s perspective, what is happening from the participants’ perspective, and how these relate to the theory behind the study.

Cho and Trent (2006) write about validity as being transactional and transformational. Transactional validity is the “interactive process between the researcher, and the collected data that is aimed at achieving a relatively higher level of accuracy and consensus by means of revisiting facts, feelings, experiences, and values or beliefs collected and interpreted” (p. 321). By doing things such as member checking,
collecting rich data, or looking for findings that are inconsistent or discrepant (Cho & Trent, 2006; Maxwell, 2005; Patton, 2006), I checked the accuracy of the data as I collected them, and asked follow up questions of my participants if I was unclear about some of the statements or what I observed them doing or saying.

**Generalizability**

In qualitative research, generalizability can be seen as a form of validity but is not always necessary. The need for generalizability depends on the study’s purpose and design. Generalizability is the ability to apply findings from one study to other similar situations; in this case it may be applicable to other districts that have seen similar increases in ELL population. Maxwell (2005) differentiates between internal generalization and external generalization. Internal generalization focuses on all elements within a single study; do they all relate to each other and are they all accounted for? “Internal generalizability refers to the generalizability of a conclusion within the setting or group studied, while external generalizability refers to its generalizability beyond that setting or group” (Maxwell, p. 115). In terms of external generalizability, this study may relate to what is happening in other school districts regarding Title III funding and decision-making in general. However, a limitation regarding the generalizability of this research site is the fact that the school district was investigated by the United States Department of Justice. The findings from the investigation and the subsequent actions taken by the leadership of the school system are unique to this district and thus the findings of this study may not extend to other school districts that have seen similar growth, yet have not had a government entity telling them what to do.
There may be consequences from my research including implications for further research, a call to change/reform, or perhaps those involved will be more cognizant of their actions as they go through the fiscal process. The school district in question may find the results of my study informative and other districts that have experienced growth similar to Radcliff School District may learn from this example.

**Reliability**

A researcher must be careful, consistent, and meticulous in monitoring or controlling the data collected. Being able to report valid, quality data, the researcher must take great care to ensure the data collected are protected. “The credibility of the qualitative methods, therefore, hinges to a great extent on the skill, competence, and the rigor of the person doing fieldwork as well as things going on in a person’s life that might prove a distraction” (Patton, 2005 p. 14). It is of the utmost importance for the reliability of this study that I have a firm understanding of and organizational system for the data collected so that everything can be analyzed and reported in a systematic way. “If a later investigator followed the same procedures as described by an earlier investigator and conducted the same case study all over again, the later investigator should arrive at the same findings and conclusions” (Yin, 2009 p. 45). Through following my interview and observational protocol, operationalizing my data collection methods, analyzing the data using a coding index and recording each of the steps I took throughout the data collection timeframe, I ensure that this aspect of reliability was achieved.
Limitations

This study is a case study so therefore the findings are limited to the research site. However, because this is a large, diverse school district that has seen a large influx in English language learners, other school districts may be able to learn from their example. Policy makers may be able to use this case study as an example of a correct or incorrect application of policy. Limitations in interviews may include “possible distorted responses due to personal bias, anger, anxiety, politics, and simple lack of awareness since interviews can be greatly affected by the emotional state of the interviewee at the time of the interview” (Patton, 2006, p. 306). Observations and documentation help make up for interviews that are lacking in clarity or specifics. The use of various data sources and triangulation between sources helps to account for limitations that arise due to interview complications.

Conclusion

This study was designed to add to existing research regarding the monetary resource allocation within a large, diverse school district involving key players from the school central office and various school sites as it relates to English language learners and federal funding for a fiscal year. A case study was used to help answer the research questions. Data collection procedures, analysis, and reporting methods were aligned so that a narrative of resource distribution, understanding of Title III policy, and how decisions are made within this particular setting could be reported as a detailed analysis.
Chapter Four

Below I provide evidence that demonstrates Radcliff School District is allocating Title III funding for ELL students in ways that are compliant with federal legislation but due to an unclear decision-making process and evolving interpretations of policy, expenditure processes may be inefficient. The current methods of tracking the money and allocating funding to schools is not transparent, therefore it is difficult to say if all ELL students within the district are benefitting from the funding as it is intended. Over the course of this study, I learned that many of the participants interviewed at the school level do not fully understand the implications or intent of Title III funds and are confused about how the money is spent; and, while those at central office understand the policy, they do not participate in the decision-making process.

This section is organized by addressing the research questions through the lens of the conceptual framework explained in section two. I begin with a brief description of Radcliff School District including a narrative on events that have taken place there in recent years that shape current spending practices and decision making processes. Themes that emerged through analysis of the interview, documentation, and observation data will be discussed. Below I address the budget timeline and allocation of funding before describing how school leaders understand the policy and make their decisions.
Context: Radcliff School District

Radcliff School District espouses to provide quality education for ESOL students and to make progress on the goals set by the state and federal government regarding annual measurable achievement objectives. Through Title III funding, the school district is able to provide supplemental resources for these students to help them reach federal and state goals. Decisions made regarding how Title III funds are spent within the school district come down to a handful of people who work in the central office of the school district.

As described in chapters two and three, the ESOL department at the central office level operates within a long-standing tradition of decentralized management with the majority of the decision-making falling on the shoulders of the ESOL program director. In this site-based school system, principals at schools have the autonomy to make decisions impacting their schools in terms of staffing, budget allocation, discipline, etc., and the same goes for departments at the central office. For example, within the ESOL department, the director has the same responsibility of managing her budget, providing professional development, or spearheading learning initiatives. Money from local, state, and some federal entities is distributed to the schools and principals have discretion to make decisions on the use of these funds; however, money from Title III is allocated by the central office, i.e., principals do not get Title III funding to spend as they choose. This process will be explained later in this section. The ESOL director is responsible for writing and coordinating the Title III grant, and other participants interviewed disclosed that she independently writes and submits the grant with little assistance from them.
Radcliff School District has undergone several state and federal audits as well as an investigation by the Department of Justice. The state and federal audits are a regular occurrence for any school district and happen in pre-determined cycles. Federal program monitoring happens for schools in Virginia every five years (Virginia Department of Education, 2014a). The Department of Justice (DOJ) recently became involved in this school district. The DOJ responded to a complaint filed by a parent of a student regarding the provision of ESOL instruction at one of the schools within the district. After the initial investigation into that case, a larger one was launched into the operations of the school district as a whole. Through this investigation, the DOJ found several compliance issues regarding the provision of ESOL services that needed to be addressed including:

- Appropriate ESOL services to all ELs, qualified ESL/ELD and sheltered content teachers, qualified administrators of ESOL programs, appropriate procedures and services for EL SWDs [students with disabilities], adequate materials to implement ESOL services, meaningful communications with LEP parents, appropriate registration materials and opt-out procedures, nondiscriminatory student discipline, and effective monitoring and evaluation of the District’s EL programs (United States Department of Justice Office of Public Affairs, 2013, p 5).

These issues were addressed in a settlement agreement between Radcliff School District and the Department of Justice reached in August, 2013. Federal and state audits and the
settlement agreement have impacted how Title III is spent in a number of ways, addressed in the narrative below.

I will provide answers to the research questions by describing resource allocation in Radcliff School District as a process and a product. I begin by describing how Title III money is spent and distributed within the school district and how school leaders make sense of the policy they are implementing, and I then describe and analyze how ESOL program leaders make their decisions, and in closing, discuss implications for research and practice from these findings.

Findings

Title III Funding in Radcliff

Title III funding differs from money that comes from the local jurisdiction because it is an allocation from the federal government based on student enrollment. Reimbursements are paid to each school district within that state based on the number of ESOL students enrolled. The director of ESOL in Radcliff referred to the grant as an entitlement grant. “If you have the bodies you are entitled to the money, you just have to show and prove…have evidence that you are using the money in a way that is allowable.” The amount of Title III funding on a per-student basis equates to approximately one hundred dollars per ELL student.

On more than one occasion, the principals and school district leaders interviewed in this study spoke about the district budget being a major concern in their planning and implementation of the ESOL program, but they did not distinguish between local funding and Title III funding. According to the bookkeeper interviewed, for the 2013-2014
school year the money spent on ESOL instructional programs from local and state funding was approximately $1,220,000 whereas the money coming from Title III of NCLB was approximately $1,702,110. There are specific guidelines regarding how Title III money can be spent, specifically it is used to supplement instruction. The bookkeeper explained that the majority of local funds used in the ESOL program offices were spent on administrative positions, while Title III money was spent on student learning. The positions that were fully paid for with Title III money are for specialists who are supposed to assist schools with instruction, and the professional development coordinator: “the professional development coordinator… is 100% grant but [the director], myself, her executive secretary, all of the central registration personnel including two assessment specialists are all 100% locally funded”. Other positions may be funded partially by local funds and partially by Title III funds. The administrative coordinator of the ESOL program explained how Title III funds could be used in more detail: “it can’t be used to supplant things that are provided to all students so if you provide something to all students in the county, you can’t use Title III money to fund those same activities for ESOL students.” The supervisor for EL instruction provided an example of supplanting:

You can spend the money on anything that is above and beyond what is required by the law… for instance, IPADS in the classroom- it is not essential for instruction so you can provide IPADS; however if you’re getting IPADS with local funds for kids and not providing them for ELs that would be considered
supplanting because if you have the funds to provide them for other kids and not for ELs then that would be considered prejudice essentially.

Negotiating the meaning of what is an allowable and non-allowable expense is integral in understanding the policy itself, but also in the funding and decision-making processes.

**Order of events.** To understand the decision-making process and how Title III money is used, it is important to know the step-by-step order of events in which the funding is obtained and spent because it is different from other funds that school districts receive. The Title III funding process begins when school districts report to the state how many ESOL students are enrolled by September 30 of each school year (the numbers calculated are used for the budget allocation of the following academic year). For the 2013-2014 academic year, the enrollment numbers from September 30, 2012 were used to calculate the allocation. The state collects the enrollment information and shares it with the federal government. The state superintendent submits a memo that says they have awarded the allocations to each of the school divisions in Virginia for the amount of money they will receive based on the prior year’s enrollment. According to the director, “The state-level superintendent puts out a memo that says she has awarded the allocations to each of the school divisions in Virginia for the amount of money they will receive based on those enrollment numbers.”

School districts fill out an application describing how they are going to use that money, which is submitted via an online program called Omega prior to the memo being released in anticipation of funding. In preparing the proposal, the district assumes that the allocation will remain the same or increase based on the increase in students;
however, adjustments are made as needed after the official memo is released. The application acts as a grant proposal for the Title III funds and is submitted on July 1, 2013 for the 2013-2014 school year. Below is a timeline that shows the Title III budget cycle for the 2013-2014 academic year.

- September 30, 2012: Enrollment of students is reported to the state
- February- May 2013: Planning and writing the grant
- July 1, 2013: Grant proposal is submitted to the state via online system called Omega
- July 1, 2013: If approved the school district will have the 2013-2014 funds available on a reimbursement basis as of July 1
- September 6, 2013: Superintendent of Virginia releases a memo with specific allocations for each school district
- September- October, 2013: Changes are made to the grant as needed based on the amount designated to the school district
- October 2013-July 2014: If needed, amendments are made and submitted to the state for approval

The federal money that is applied for and used has a quick turnaround time. The plan is created for how to spend the money before the school district knows how much money they will be allotted. Once approved, the school district can start spending money on grant-funded programs and services and the state will reimburse them with the money they receive from the federal government. The process is very time consuming because often it takes several amendments to the grant proposal before it is approved by the state.
According to the application guidelines released by the state of Virginia, the criteria for application approval is as follows:

- Funds must supplement the core programs and services and core language programs and services provided to ELLs as required under other local, state, and federal laws.
- Funds must be used for programs that will increase the English language proficiency and academic achievement in core content classes of ELLs and immigrant students.
- Funds must be used to provide sustained high-quality professional development.
- Programs must be based on scientifically-based research.
- Funds for parental outreach programs that assist families with the attainment of English language proficiency and assist their children with attaining academic achievement.
- Administrative costs are limited to 2 percent or less of the LEP sub grant award.
- LEP sub grants that fall below $10,000 require that school divisions must apply in consortium with one or more other school divisions to reach the $10,000 threshold (Virginia Department of Education, 2014b p.3)

The number of people involved in the grant writing process and the planning process are significantly fewer than the number involved in the budget decisions regarding local and state funds. The ESOL program director is the one who writes and submits the grant though she does meet periodically with the Associate Superintendent of Student Learning and Accountability who explained:
I meet with the director and she keeps me apprised of the status of the grant as we move throughout the year. We don’t check in on that once a week, but we check in with that periodically to ensure we’re on target or not on target.

There are few meetings and work sessions regarding preparation of the Title III proposal and although approval of the grant is needed by the superintendent and several of his staff members prior to the final version being sent to the state, there are fewer steps in the decision-making and budgeting process than for the rest of the school system budget.

**Allocation of Title III funds.** The way Radcliff School District allocates Title III money is based on several factors. Once the grant is approved, the director will let the principals or the department chairs know of opportunities to use professional development or materials that benefit students. Principals or department chairs can request to be a part of an activity or use resources obtained through the grant and are later reimbursed for them. The director does not need to be specific in the grant in terms of with who gets what money and why. To the contrary, she lists the activity and why it is beneficial and then the schools have the option of participating or not participating. She stated:

>You can be very specific in the schools that you target but you can also just name an activity that you’ll use it for and then you focus in on how is your activity assisting English learners without supplanting their requirements.

The school principals and department chairs must contact the central office ESOL team to let them know if they want to partake in the activities and in what way, but not all
schools chose to participate and some schools may not be aware of grant-funded opportunities.

The decisions made by the ESOL program director are not always final, because making changes to the grant is possible. “Revisions are changes that are necessary to the program application, or budget before approval can be granted…Amendments are changes that are made to the program application or budget after the approval of the application” (Virginia Department of Education, 2014b p. 3). The director claims to make decisions to get the most use out of the money, i.e., to optimize. “That is my grant management style, I like to be sure that there are certain funds available to all schools and there are funds available to support the needy schools.” She controls the grant, but allows flexibility with money moving from one initiative to another based on the participation and interest of schools and principals.

For example, if there is an opportunity or an initiative that she would like to start implementing she tells all the schools in the district about it and they can choose to participate. “My management style is, I am going to put out the invitation and see how many schools will take advantage of it and see how much money I can allocate toward that and what kind of price I can negotiate.” The money that is not used for that particular initiative can then be allocated to other activities based on the response of the principals. An example of this is funding that Radcliff School District received for the number of immigrant youth enrolled in the schools, a sub-grant of Title III. The director started an initiative for immigrant youth tutoring after school and allocated approximately $45,145.00 for the salary and benefits of the tutors and the supplies. Fewer than 20% of
the schools opted to participate in the program. Not all of the money was used so it was transferred into another immigrant youth category and principals had the option of participating in that activity instead. Another example is that about 55% of the schools participate in a parental outreach program. The bookkeeper gave another concrete example of this in how she is trying to track the money more closely:

One of the things I am trying to do is look at the dollars by project versus as a whole. You know we have certain allocations for each project that we have in the grant and to know where those dollars are being spent, how much money is being taken advantage of…when you send them out to [XX] schools, you have funding for [XX] schools but only ten are taking advantage of it…we are trying to figure out how to re-allocate those funds to a different project.

Currently, Radcliff is going through an ongoing budget analysis in which they have refocused their attention and goals so they better align with the state recommendation of decision choices. The state wants school districts to spend less on material items and instead focus on instruction and professional development. The bookkeeper acknowledged without funding from Title III there is no way Radcliff could afford the professional development that Title III has allowed them to do. In the grant award year 2012 (academic year 2013-2014) the award amount was $1,702,110.74. This equates to about $91.73 per ELL level 1-6 student within the school district who is receiving services, who is being monitored, or who has opted out of receiving services.

A breakdown of the amount allocated within each category of Title III is as follows as found in the grant application that was most recently amended in May 2014:
Table 3  
*Title III Allocation within Radcliff School District*

<table>
<thead>
<tr>
<th>Category</th>
<th>Dollar Amount Allocation</th>
<th>Percent of Grant</th>
</tr>
</thead>
<tbody>
<tr>
<td>1000 Personnel</td>
<td>$962,770.53</td>
<td>56.5%</td>
</tr>
<tr>
<td>2000 Benefits</td>
<td>$228,281.73</td>
<td>13.4%</td>
</tr>
<tr>
<td>3000 Purchased/Contractual Services</td>
<td>$386,295.91</td>
<td>22.6%</td>
</tr>
<tr>
<td>4000 Internal Sessions</td>
<td>$0.00</td>
<td>0%</td>
</tr>
<tr>
<td>5000 Travel or Other</td>
<td>$30,000.00</td>
<td>1.7%</td>
</tr>
<tr>
<td>6000 Materials/Supplies</td>
<td>$94,762.57</td>
<td>5.5%</td>
</tr>
<tr>
<td>7000 Payment to Joint Operations</td>
<td>$0.00</td>
<td>0%</td>
</tr>
<tr>
<td>8000 Capital Outlay</td>
<td>$0.00</td>
<td>0%</td>
</tr>
<tr>
<td>9000 Other</td>
<td>$0.00</td>
<td>0%</td>
</tr>
</tbody>
</table>

*Note. Percent totals less than 100 due to rounding*

Within each category of the Title III Grant application, the director needs to explain how the money will be spent and justifies the amount. Within each section of the grant there is a justification for the amount spent and a breakdown of how much money is spent (See Appendix K). The director is in charge of making the allocation decisions:

I lead the process of looking at the strategic plan, what its initiatives are, looking at the schools of improvement that have been in accountability status...then I say
how does the English learner population factor into that, that helps to determine what activities are needed.

Not only does she look at the data regarding school performance, but she also meets with other departments to see what they are doing, and how the ESOL office can help. “I am gathering information from other [departments] and the superintendent’s staff and then I am the point person who is connecting with other offices and putting together what other action steps are.” The director stated that she has not held formal meetings to brainstorm how Title III money can be used instead she does it individually.

The bookkeeper acknowledged that when she started in her position in 2013 there was no method of tracking how much money was left in each category after schools would take advantage of certain programs. Since she began, she created a spreadsheet that shows when money was spent and how much was left over after the end of each month.

I have been working on it by breaking it down by project so that I’ll be able to say we have $5,000 left on this project what do you want to do with it, do you want to put it into schools resources, do you want to put that into professional development…

This gives her and the director an idea of what is left over and what can be redistributed. They use this information to help move money from one category to another so that more schools can use programs or services based on need. Although the funds are categorized in the Omega grant system, they can flow from one category to another if needed and the director only needs to submit an amendment to the grant for the state to approve. The
bookkeeper explained, “as long as what you’re using the money for is within your grant application, for the most part it is within our discretion so long as there is a reasonable justification for it.” The director’s goal is to submit one amendment per year due to the lengthy process but that amendment can have multiple changes. She does not create new categories or programs but rather will transfer money based on the need or popularity of programs or services.

For example, if not many teachers apply to attend a conference, they will take the leftover funding and move it into a category having to do with professional development. There is flexibility in funding within the parameters of the grant but only so much as what has already been approved. The ability to keep the funds liquid could be considered beneficial since there is always money within any given category for schools to take advantage of selected programs and services; however, not all schools elect to participate. It is also true, though, that this method of allocating funds is devoid of any evaluation of program impact or progress toward specific objectives; it is based largely on demand rather than any measure of effectiveness. From the perspective of the Rational Actor Model, the value being maximized is more attuned to school and teacher preferences than to any indicator of learning outcomes.

Within each category, a description of what is actually purchased is provided. For example under personnel, the salaries and benefits of over 20 people are supplemented in part by funding from Title III. The professional development purchased by Title III funds includes courses taken at local universities, and consultant-based and webinar-based professional development. What is not tracked is how much money each school is
getting or how often a school participates in grant funded opportunities. “We don’t have to actually write in the schools into the grant that will be supported.” Although every school has the ability to participate in certain activities, or purchase certain Title III funded materials, not all schools do. The director stated “I’d like to keep it open and I’d like to support schools in need so it really depends on the activity.” Although there is flexibility with how funds are used, this means that not all ELL students are benefitting from Title III funds because certain schools and teachers may not be participating in the programs or services offered by the ESOL office.

When asked about how much money went to each school and if there was a correlation between schools with high number of ELL students receiving the highest number of Title III funded programs, professional development, or instructional materials, the central office staff persons interviewed were not able to tell me, though they did say it might be possible to track based on the journal vouchers (JV’s) that schools submit to receive reimbursement. When prompted to see if I could gain access to that information I was told it would take too long to gather and my request was denied. More to the point, the office in charge of these allocations does not track this information. Additionally, none of the principals interviewed could tell me how much Title III money (in the form of instructional materials, reimbursements, professional development etc.) reached their schools (much less how these resources impacted instruction), although they did have an understanding that Title III money impacts their schools.

The middle school administrator stated professional development for their teachers was provided with Title III funds. Additionally, she said there was a materials
inventory conducted at their school site where the teachers wrote down what they had and what they wanted and then the ESOL office provided materials through Title III:

[They had to] fill out a form which they would have to put in a justification why they wanted this material and it went from that level to the administrative level and [then the] ESOL district office had to approve it. So it was reviewed at several levels.

The elementary school administrator did not know how much Title III money reached the school, but she did acknowledge benefiting from Title III funding:

I mean, we get things but I am not exactly sure…I know at the school level if they ask for something, especially with the new agreement that we have, they get whatever they ask for…we’ve never been denied anything that we’ve asked for.

The principals at the schools understand the policy enough to know that they benefit from Title III funding, and they acknowledge the ability to ask for things from the ESOL office, but they do not clearly understand the process or the restrictions associated with Title III funding. Because the majority of decisions are made at the central office level by one person, there is uncertainty about Title III among the administrators interviewed.

**Understanding Title III in Radcliff**

The Rational Actor Model presumes a logic of action that suggests that decision makers have a clear and relatively unambiguous sense of the goals and expectations associated with a choice opportunity, and further, that they have the information they need to weigh choice alternatives in order to select an optimal path. Evidence related to Title III decisions in this school district suggests that the goals themselves are less than
clear to decision makers at the outset of their choice opportunities; instead, they seem to engage in an ongoing process of interpretation as the decision-making process unfolds. The procedures themselves seem reasonably well understood, but the linkage between choices and outcomes related to goals is considerably murkier, particularly the connection between resource allocation choices and goals of quality instruction and learning.

A challenge regarding Title III is that different people interpret the guidelines in different ways and over the lifetime of the NCLB law, new guidance and direction has become available. School officials are affected by punctuated equilibrium (Baumgartner, Jones, & Mortensen, 2014; Kingdon, 2003) because as they learn the policy and try to implement it, there are gradual changes and clarifications made by their superiors at the state or federal level, which change what they are able to do with the money. According to the program director, “if there is a request that comes in and I am unclear…we contact our region IV supervisor.” There is a chance for school district leaders to make sense of the policy as they work their way through the grant writing process with the help of those in leadership positions at the state. The interpretations of the policy cause disturbances in the equilibrium and those at the school district level have to make sense of the policy as it evolves.

There are supports in place to assist school leaders with understanding Title III policy, including professional organizations such as the Virginia ESOL Supervisors Association (VESA) or at an annual grant coordinator academy each summer. The director explained, “The states… all had an organization to help each other and they have
sort of like sub-committee groups that help the new persons and in July they have a brand new coordinator’s academy so they do have a system set up to help people understand.”

Additionally they can appeal to the state with questions and concerns that they have while they are writing or editing their grant in order to make sense of what they are doing but interpretations of the policy from the state education agency or policy makers can change even within the grant award year.

One participant noted that the state does provide one-on-one consultation while grant coordinators are filling out the application to provide assistance:

[The support] was good because it walked me through some stuff I was thinking about purchasing and I realized I can’t justify that with the new restrictions so I am going to have to pull that piece out and it enabled me to re-work it a little bit.

The coordinators of the grant, or in the case of Radcliff School District the director of ESOL, can request assistance from the state to help with the grant proposal. The state leaders give direction for how district leaders should be writing the grant. “They would tell us flat out, we are going to deny your first request because we are certain there is going to be something in there incorrect because this is so new.” The one-on-one discussion with the leaders from the state helps grant coordinators understand the policy. “It gives us an opportunity to set up that one-on-one time to walk through how we can meet the needs of students without supplanting.” The gradual changes in interpretation of the policy by the state and federal officials make it difficult for program leaders to fully make sense of policy.
Within Radcliff School District the responsibility of understanding and implementing the Title III grant rests on the shoulders of the ESOL program director. The director is responsible for filling out the grant, explaining the grant and spending processes to her superiors, or working with other departments and schools to coordinate how the grant money can be used. Every participant interviewed identified the ESOL program director as being the one in charge of understanding, writing, and submitting the Title III grant. Very few of the participants interviewed had a firm grasp on the Title III policy itself or how it can impact schools. All three principals interviewed said that they had heard of Title III but they were not exactly sure what it was for. The participants at the school district central office all knew what it was for, but acknowledged difficulty in making sense of it.

Even the director expressed frustrations with understanding of Title III policy regarding her interpretation of the policy versus the interpretation of those at the state and federal level. In the past, she had justified many of her decisions by what was written in a Title III handbook for educators, yet her interpretation was different from others. For example, in reference to a decision choice related to expenditure of Title III monies, she said: “...the new interpretation of how the federal government has interpreted that language...they went back and said well schools are expected to provide core language instruction so that should not come from these dollars.” After receiving this interpretation, her grant proposal had to be revised to shift money from one funding category to an allowable one. This creates a distortion in the decision process because the district’s primary grant writer has insufficient information to weigh choice
alternatives during grant writing, and the goal becomes compliance instead of optimizing learning outcomes. Rather than having clear and unambiguous guidelines, she has to engage in a “testing” process regarding her decision choices. She had relied on materials in a handbook for educators, but her interpretation differed from that of state officials.

Guidance is available to assist school leaders in how they make sense of and understand the policy as they make decisions, but there is less flexibility in what the money can be used for because over time, the interpretation of the policy is becoming more specific. The director was using a reference booklet that was published shortly after the inception of NCLB by the Office of English Language Acquisition, Language Enhancement and Academic Achievement for Limited English Proficient Students (2002) which essentially is a reprint of Title III of NCLB to justify her decision-making process and to make sense of the Title III policy. After the federal audit of Virginia in 2008 and again in 2012, she realized that her interpretation of the grant differed from interpretations by the state and federal governments.

An example of how interpretation or understanding of Title III policy impacted schools is evident in the implementation of Radcliff School District’s past summer school program for English language learners, funded in part by Title III. This program was meant to promote English language development and to assist students in achieving academic success. The program was even given an award for “significant contribution to education in Virginia” (Radcliff County, 2011) and allowed high school ELL students to take academic classes they could use toward graduation in order to increase their chances of graduating on time and catching up academically to their non–ELL peers. Classes
such as government, algebra, English, and biology were offered to students in a 6 week period in an ELL–only environment and they were given the same rigorous curriculum, the same state mandated test, and students were held to the same expectations as those students who took these courses during the school year.

The summer school program began in 2003 and continued until 2012 when Title III funding was cut. Since that time, school officials have figured out a way to continue running the program using local funds or by transferring money from one location to another. The funding was cut because after an audit by the federal government, the state of Virginia was told that they were at fault for allowing Radcliff to spend the Title III money because the school district was supplanting funds that were supposed to be coming from the local education agency in providing an education for all students. Although the school district does not provide summer school for all students, they do provide instruction in core-curriculum classes during the school year thus they are not allowed to use Title III money to pay for ESOL core curriculum during the summer months. All of a sudden, a program that was meant to help students graduate in a timely manner was no longer funded. School leaders had to scramble to find funds elsewhere so that the program could continue running in some capacity. Additionally, they had to figure out how they were going to spend the money that had originally been allocated to that program in new ways in a short period of time. At no time were the ultimate outcomes of the program in terms of student learning used as a criterion for decision-making.
Although the goals of Radcliff School District and the goals of the NCLB are well aligned with respect to student learning, parental engagement, and well-qualified teachers (Radcliff School District, 2013a), policy makers and educators interpret the means by which those goals are accomplished differently. This divergent interpretation puts a roadblock into place. The gradual interpretations, clarifications, and required changes of Title III funding at the micro level make it difficult for the program to run smoothly. One participant noted:

We were being audited by the federal government and the federal government essentially said from what I understand, it wasn’t that [we] were doing it wrong before, it was that Virginia with a previous administration had had a more liberal interpretation of the grant and how the grant should be funding local education agencies and with the new administration coming in they viewed it much more strictly.

When asked if the participant was referring to a new administration in Richmond (state government employees) or those in Washington, D.C. (federal government employees), she clarified by saying the federal officials. “It was the federal administration, so with the new president and...Arne Duncan”. When prompted about what she meant by this she explained:

…with the VDOE, it is a five-year cycle so every school division is, well audited is not the correct term but they are checked up on every five years so...They probably got hit so they had had their year previous with Bush and then the five year hit with Obama.
The change in administration at the federal level led to a different interpretation of the NCLB legislation and the expectations from the Department of Education changed. One participant noted, “Title III funds have changed drastically in the past year. It used to be a more flexible interpretation of the grant in what was considered allowable expenses and they were always very clear that it was supplemental.” Educators are impacted by limited information and the various interpretations of the law as time passes. Although there was a new administration in 2008, it wasn’t until several years later that they were audited and things started to actually impact the school district. The summer school example shows school leaders scrambling to do something in order to spend the money in an acceptable way:

It got tricky last year with the stricter interpretation of the grant and so there was at one point in a meeting when we were like “ok, you told us everything we can’t spend money on, can you just tell us what we can spend money on?” and they were like “ok, you can spend money on this, and this, and this” and it was kind of hunting and finding things that would really help kids.

Every time these clarifications are made, Radcliff regroups and starts spending their money in other ways that are suggested by the state level leaders.

In the descriptions of process presented above, procedural concerns and compliance with regulations tend to dominate the discussion, with a gradual tightening of policy resulting in fewer degrees of freedom for local actors. From the rational actor perspective, throughout the resource allocation process criteria related to student learning, parental engagement, and highly qualified teachers are not applied and considered by
leaders. Value maximizing, to the degree it exists at all, deals with maximizing results vis-à-vis procedural proxies for valued outcomes. Organizational routines (Levitt & March, 1988; March, 1994) emerge that are repeated over time to lesson ambiguity and help decision makers make sense of various requirements. The ultimate connection with espoused outcomes is inferred and supplanted by measures related to implementation; it is assumed that decisions lead to valued results.

**Understanding Title III at the school level.** All of the principals interviewed know about Title III but are unclear about how it can and does impact schools. The principals want to know more and want to be included in more of the discussions and decisions regarding how money can be spent, and how it can help the schools. They seem happy with the programs or materials that are being offered yet they want more autonomy to make decisions about the money that will impact their schools. One administrator noted that a large amount of professional development was provided with Title III funds for the teachers at her school but she would like the funds to be spent on things such as technology or reducing class size. “I think technology is the great equalizer …and dare I say? Smaller class sizes.” There are unclear expectations and understandings of where the money can be spent, and in what capacity.

The high school administrator interviewed knows the law but is unclear how it is applied to the schools. “I do know it is a federal program that provides resources to schools for specific populations…as far as the specific regulations, I am not totally familiar with it.” An example of how the high school administrator and the ESOL director used Title III policy to their advantage is demonstrated with the summer
enrichment program. The ESOL program director traded funding with the high school principal so that the program could continue. Money from the school budget went to the summer school program and in return the Title III money was spent on instructional materials for ESOL students at his school:

I was asked by the director of ESOL if I would be willing to support our ESOL students through a summer school scholarship and in exchange she would provide $15,000 in resources. I sent $15,000 to central office, which they then used to create a summer school program for our students and they in turn bought me $15,000 in resources identified by our ESOL teachers.

In this case, the director and the school administrator acted in what they believed was in the best interest of the students and used their own interpretations of the law and regulations on how the money could be used to exchange funds.

None of the observed meetings between department chairs and the ESOL leadership team in the 2013-2014 academic year had Title III on the agenda and it was only once brought up in a discussion regarding the ordering of materials. At one of the meetings, one teacher asked, “What is the process for ordering through the grant?” and the director replied, “We don’t have a process.” The director explained to the teachers that money was allocated in late winter once she saw what was available and then figured out where she can spend the money. There is little understanding of the grant with respect to what it can be used for and how it can help schools because so few people manage the grant funds and even they are negotiating the expectations and regulations with what it can be spent on. This centralization of decision making leads to confusion
among other members of the community because teachers want to know how money meant for students can benefit their schools. The teachers need resources and would like to use Title III money to get those resources.

The teachers at the schools are confused because of the lack of information and the unclear process for using grant money or taking advantage of grant-funded opportunities. The elementary school department chair said that she tried to order picture dictionaries with grant money but there was a snafu because the books could not be purchased with the grant money even though the teachers wanted it for their resource library. Dictionaries cannot be paid for with Title III grant money and the teacher had not been told that, nor understood that while ordering. The other teachers in the meeting were left confused and frustrated because although it had been explicitly asked, there was no real explanation of why or how they could use the Title III funds. Principals and teachers know they get things from Title III but they are not exactly sure what or why and school district leaders know they have to spend the money in allowable ways, but due to the ever-changing interpretation of the law, it is hard to make sense of what is allowable. This is significant because the ESOL program leaders, the principals, and the teachers are all confused about what the money can be used for. The elementary administrator said, “I don’t really feel like we have a good understanding of those funds and how they are being spent. Where we get that money from, or who figures those numbers out.” The goals toward which they are working are unclear and there is no clear guideline for what money is spent on and how it is used in schools.
**Decision Making**

In Radcliff School District, the ESOL program director makes the majority of the decisions and people rely on her to make the best decisions for the organization and for the students. The director began working in the school district about three years ago amidst the start of the state and federal audits and the Department of Justice investigation. She has acted as a liaison for the school district to the state and to the district’s teachers. Every single participant interviewed referenced her as someone they go to for guidance and to ask questions regarding Title III funding. If she does not know, she relies on the state ESOL office to answer questions for her and they in turn would ask federal officials for assistance. She is also the only one involved in preparing the grant application for Title III funds. There are avenues of support for grant coordinators in Virginia such as the Virginia ESOL Supervisors Association (VESA) and regional meetings in which directors can meet with each other and discuss what is going on in their school districts. Recently, the state has posted PowerPoint presentations and directions for applying for and amending their Title III grant proposals on their website (Virginia Department of Education, 2012b).

The Rational Actor Model described in chapter two fails to fully describe the organizational processes of Radcliff School District. Although there is an autonomous decision maker who has clearly defined goals, she does not have the ability to choose from alternative methods due to outside influences such as changes in interpretation of the policy, by the Virginia Department of Education, the Department of Education, and the Department of Justice. The ultimate goals of the policy become supplanted by
procedural compliance. Therefore this decision maker’s value maximizing choices that would be expected in the RAM are derailed. This particular model does not fully represent the decision-making processes within the school district. Goal-oriented decision making is hindered by outside influences and by ineffective procedural norms including limited information, routines and time restrictions which will be discussed below.

**Goals and outside influences.** At the broad level, the goals of the Radcliff School District ESOL Program do fall in line with the goals of Title III and NCLB. The annual measurable achievement objectives of students making academic progress, obtaining English language proficiency, and making gains in reading and math scores all correlate with NCLB and Title III. Only two people interviewed mentioned the word “goals” in their dialogue about Title III funding and decision making processes, showing that perhaps goals are not always considered when making decisions about how money is spent. Further, the goals that were mentioned had nothing to do with the annual measurable achievement objectives and instead focused on doing what they were told by state or federal officials. Hence, complying with the procedural requirements of the policy appears to be the operational goal considered by district decision makers.

The bookkeeper explained that because of the audit several years ago, and because of the Department of Justice agreement, the goals of the district have been refocused so that they align more with state recommendations. For example, the state would rather school districts spend money on professional development than instructional materials because if professional development goes directly to the teachers, it is definitely
reaching the students in some way, whereas instructional materials could be used by any student (not just ELLs), or teachers might not ever use those materials. This demonstrates a breakdown of the Rational Actor Model, because choice has been constrained to a number of approved or preferred choices. Instead of her choosing from a selection of alternatives on how to spend the money derived from a search among many alternatives, she is essentially told how to spend the money.

The director spoke at length about the goals of the organization, the goals of each department within the organization and trying to align the monetary allocation to meet those goals. She spoke of trying to maximize the impact the money can have on the school district by collaborating with these departments, which could be seen as a value-maximizing aspect of the Rational Actor Model, at least in terms of efficiency criteria. The example she gave was about professional development: the goals of human resources, the office of professional learning, and the Title III grant allow money to be used toward high quality teachers so those three offices coordinate to offer more professional development for more teachers:

The Title III grant application has always had a section on coordinating services, it has always asked how is the way you’re using the money for Title III working with the other Titles but in the last two years Virginia has made it very specific and they are expecting us to be pooling our money…towards activities that will benefit the whole school division.

They were not coordinating services prior to the Virginia Department of Education telling them they should, but now they are:
They had this section in the application that said how are you coordinating services…now they are looking much more carefully that you are actually combining, pooling your funds so that each grant is not replicating the activities in another grant.

Due to outside influences the decision making processes such as collaboration among departments and with other NCLB funded grants have been altered.

The Department of Justice began an investigation in Radcliff School District regarding how the schools were running their ESOL programs in the 2012 academic year. Since the settlement agreement with the Department of Justice was reached in August 2013, the funding focus has shifted to spending money on professional development, similar to the suggestion of the state. Every single participant interviewed referenced the Department of Justice when talking about how or why money was spent a certain way although the DOJ and Title III are not interrelated.

One participant expressed his sentiments in working with the DOJ: “They have their belief system with how things should be happening and even though that is not law you have very little choice when making those decisions because your alternative is to be taken to court.” The settlement agreement changes the focus of school leaders and limits their decision making discretion. The participant mentioned above felt as though the district was forced to make decisions based on the DOJ agreement and not necessarily what was in the best interest of the students. Through the settlement agreement (Department of Justice, 2013), the district specifically agreed to:
• Provide all ELL students with adequate English Language Development (ELD) and content instruction provided by teachers with appropriate qualifications/training
• Monitor the progress of ELL teachers and administrators toward obtaining required training, and ensure that administrators account for the use of appropriate ELD and sheltering techniques in teacher evaluations
• Require principals or other designated administrators to receive training regarding their ELL program-related responsibilities
• Modify the district’s registration and enrollment practices to ensure that students are able to access its programs regardless of race, national origin, or immigration status
• Provide ELL students and LEP parents with meaningful access to discipline and special education forms, codes, notices, procedures, and meetings
• Institute cultural responsiveness training for teachers to promote effective engagement with students from diverse cultural and linguistic backgrounds; and
• Collect and review data to identify and address any student disparities and to evaluate the effectiveness of ELL programs (p. 1)

These newly identified obligations place an unexpected burden on school district leaders because they limit choice in regard to how Title III money should be spent.

The Rational Actor Model describes the decision maker as having a goal and choosing the best alternative to meet that goal, but when the goals change or are influenced by others there is a break down in the RAM model and the director is not able
to act in a way that makes the best use of her time or of the Title III money. All alternatives are not fully considered because school district leaders are trying to follow the new protocol that may not allow them to spend the money in the optimal fashion. In addition to restricted choice, school district leaders and principals encounter roadblocks in the decisions they make because of limited information, outdated expectations or routines, and time restrictions. The concept of bounded rationality as it relates to the Rational Actor Model and the framework discussed in section two explain what is happening in Radcliff School District more accurately with regard to the decision-making process.

**Limited information.** Many of the participants interviewed both at the school level and in the central office expressed frustration regarding their own limited knowledge of Title III funding and the decision making process in general. This limited information stems from the lack of communication between central office staff and school administrators regarding what Title III is, what it can be used for, and how it could benefit the schools. Communication problems may stem from differing interpretation and implementation of the policy.

**School level.** All school level administrators and department chairs interviewed mentioned similar frustrations regarding the funding process. One principal interviewed said, “I don’t really feel like we have a good understanding of those funds and how they are being spent; where we get that money from or who figures those numbers out.” One department chair interviewed said, “I really don’t have a lot of knowledge about how it
[Title III funds] is allocated within the district…that information is never shared with us.”

Another principal said:

I don’t think the Title III money was advertised to the principals as very clear as this money is being used for this purpose…I wasn’t clear how much money it was, exactly where it goes, if it was available to us for an additional resource if we wanted to request something which would have been helpful to know five years ago.

In addition to lack of information regarding the funding, some principals expressed frustration and lack of information regarding materials and resources that are purchased and given to them. One administrator said:

It is kind of haphazard on if you know about it. For something as large a resource as this was I thinking it would have been beneficial if the school had been made aware of how we could utilize the funding.

The director selects programs and materials that could supplement instruction for English language learners but not all schools take advantage of these programs and therefore not all ELL students are benefiting. Principals may not participate in the programs because they do not know about them or the information may be shared but they do not fully understand what they are supposed to do with it. The bookkeeper explained the funding process the principals must follow to receive goods or services paid for by Title III:

We send out a form saying if you are interested in buying [materials] for your school, these are your instructions. You have X amount of dollars to spend, please submit your specific requests…the [administrative coordinator]…would
approve, sign, and review all of the materials orders. She would then send them to me for my review just to make sure that the money factor was ok. It would then go back to the school, they could then order the [materials].

After a proof of purchase plus all accompanying paperwork is sent back to the bookkeeper, schools get reimbursed for the money they spent on materials purchased with grant money. If principals and those at the school level were more informed about the Title III process such as the timeframe for ordering, or the materials available they might take advantage of more opportunities.

Further, it is worth noting that the centralized choice model is at odds with the decision-making culture of this site-based school system. If school leaders and teachers had a say in the grant writing process, they could better communicate their needs with the director and they could plan to spend the money in ways that would have a greater impact on student learning based on the needs of the schools.

**Central office level.** Much like the principals and department chairs who have frustrations with limited information being shared about what Title III is and how schools can benefit, the participants at central office have their own frustrations. Many of the participants at the central office level said that they were not involved in the grant writing process at all and they had limited knowledge of details of the grant itself. For people who are a resource for school level educators, this seems disconcerting because principals and ESOL teachers look to them for guidance. Additionally, the director works with limited information from state officials while planning and writing the grant. For example, she said one frustration was, “how you are going to use your money is always
due before you actually know how much money you have coming.” While completing the grant, the director assumes she will get the same or a similar amount year after year. Oftentimes the central office administrators may need clarification from state officials regarding what can be written in the grant and they are unable to answer those questions in a clear manner. One participant said that he had asked about a new regulation for the Annual Measurable Achievement Objectives and his contact at the state did not have an answer. One central office official expressed another example of limited information:

Sometimes we will call the state directly and work with the folks there to try to get interpretations. Often times …you get answers like “well that is for the local jurisdiction to decide or figure out” so you sort of get grey nebulous answers from them…but that causes us to use our best judgment, our educated decision in that case.

If state officials are unable to effectively answer questions regarding Title III or resource allocation, the school district ends up making their best guess as to what to do. Unclear goals and miscommunication interfere with a decision maker’s ability to make a rational choice, since participants are not able to make informed decisions and the whole concept of rationality becomes sub-optimal. When participants try to consider alternatives and they are not given full information, the model falls apart because they are not able to make an informed decision. The rationale becomes limited or bounded, by things such as shifting goals, time constraints, ineffective routines, and limited information. Actors satisfice rather than optimize.
Routines. I found that school-level officials were having a hard time changing routines that had been in place previous years. Once the federal government and the state gave more explicit guidelines regarding their interpretation of how the money could be spent after the audit, a challenge for the school district was changing the grant to match the new guidelines and phasing out the use of money that was already committed to certain purchases or initiatives. The director stated that a big challenge was working through how the grant was already committed and not interfering with the school district’s budget. They were only allowed to spend money as it was committed to certain categories but they were not allowed to spend it on materials or programs that they had initially planned: “Everything that is written in the grant, how it is written has to be tied to the budget lines so you have to create codes and that was a big challenge.” An example of this was more explicit guidance on the purchase of bilingual dictionaries. The school district is allowed to purchase bilingual dictionaries for use in a resource library within schools but not for use in a core classroom because “principals are expected to use some of their school allocation for local funds to pay for things that will enhance content area classes.” Prior to this guidance, bilingual dictionary sets were purchased for use in the classrooms but now principals are expected to do this with money from their local budgets. The routine has changed causing leaders to make decisions about how else to use the money, so that student learning can still be impacted.

Time. Time constraints play a huge role in the decision making processes and allocation of resources in Radcliff School District. Central office staff members face the challenge of red tape regarding getting the grant approved, purchasing the resources, and
seeking reimbursement from the state in a timely manner. Schools face a challenge of taking advantage of funding opportunities by required deadlines. The middle school administrator interviewed said that she had just found out about an immigrant youth tutoring program and “just made the deadline;” though she was certain she would get it, she seemed stressed regarding the short timeline. Another opportunity that reached schools with a quick turn-around deadline was reimbursement for the money spent at the school level for a parent liaison position. For example, one principal received an email on March 12, 2014 regarding the opportunity to seek reimbursement though Title III, Immigrant Youth funds for money that had been spent on the parent liaison position. In order to receive the funding, the principal or his designee needed to complete a six-step process by April 5 including some extensive anecdotal data collection for the ESOL office records. Although three and a half weeks may seem like a long time to collect these materials, some principals may have chosen not to participate due to the fast deadline or the work involved.

The director expressed great frustration with time constraints associated with Title III funding and the grant writing process in general. There are multiple people at each level who need to approve the grant before it gets sent to the state and it can take months for it to reach a certain level and even then it may be denied and the process would have to start over again:

The [grant writing] process might be improved by [decreasing] time and streamlining it so there would be less waiting period between approval and action. For approval of the grant and action steps to put the grant in place and then time
management in our own division processes for that expending money, JVing [writing Journal Vouchers for schools to seek reimbursement from the county], getting the money back in the account so [it can be spent again] is a long process too.

In May of 2014 the final grant amendment process for the 2013-2014 Academic year was approved after months of waiting. The money for the 2013-2014 school year was allocated, although the academic school year was nearing an end and the spending process had already begun. There is overlap between grant allocation and academic years, however the process for revisions and amendments and the time it takes to seek approval from the state is too long.

**Summary of Results**

Because of the method and process of using grant funding, not all schools are taking advantage of grant-funded opportunities therefore students at those schools could potentially be left out. Limitations on decision making such as time constraints, lack of communication, and unclear goals or expectations create challenges for school district leaders. Currently, there is no way of telling how much money is going into each school, so it is not clear if the schools with the highest number of ELL students are receiving the highest amount of funds, or if schools with needs that match provided services are actually taking advantage of these.

Currently, Radcliff School District is meeting their Annual Measurable Achievement Objectives. Although AMAO data are not available online, the school
district is on track for meeting targets. A representative from the school district provided the below information below:

[Radcliff School District’s] K-12 English Learners have consistently surpassed the Virginia targets for AMAO 1 - Progress for more than three years based on performance in WIDA ACCESS for ELLS tests in more than five years. In addition, [RSD] English learners consistently meet VA Targets for AMAO 2 - Proficiency, having surpassed the VA target in three of the most recent four years reported through 2013-14

Schools in Radcliff School District did well on AMAO 3, which gauges the performance on reading and mathematics Standards of Learning tests. For example, all of the high schools in the school district met the achievement objectives or maintained current progress for the end of year tests. The majority of the middle and elementary schools met the achievement objectives for the reading and mathematics tests as well. The fact that Radcliff School District is meeting their AMAOs on a consistent basis shows that ELL students are making progress toward obtaining English proficiency and academic achievement, thus meeting the objectives of Title III of NCLB. However, ELL students are still lagging behind their white and mainstream counterparts in academic achievement tests and on-time graduation.

Title III support may be beneficial for student learning but it is hard to know if all students are getting the money to which they are entitled. Similarly, it is hard to know what impact use of these funds has, and because of the nature of the funding, the school district will continue to get federal funding for ELL students regardless of achievement.
outcomes. The participants at the school level interviewed would like to have more input in what programs and services are funded through Title III. They would like the decision-making process to be more transparent and to be included in the process. School level employees do not have a clear understanding of what Title III is, and how it can benefit their students.

Although the funding may be beneficial and can help RSD supplement instruction for ELL students, it is clear that the funding is not enough. One participant summarized the situation within Radcliff School District:

For a county like ours that has had relatively speaking this huge influx of ESOL, it is a significant struggle because research on best practices hasn’t caught up to what the right thing to do is, often times we’ll get mixed messages…I think you see huge demands being placed on our teachers, and administrators and anybody involved in ESOL because the funding has not caught up to the expectations that are to be produced working with ESOL students.

Decision-making is an on-going process and the participants involved in this study are learning as they implement Title III policy. The reality of the decision making process is it is not perfect and if anything it is messy, retrospective and needs improvement. The Rational Actor Model is an ineffective tool in describing the decision-making process as it happens in Radcliff School District because participants are bounded in rationality and satisfice in order to put the policy into practice.
Chapter Five

The purpose of this research was to examine decision-making processes as they relate to Title III policy and money allocation. The research questions regarding how Title III policy is understood, how leaders make their decisions, and how Title III money is spent were answered by interviewing a variety of participants within one school district, reading through budget documents, and observing meetings in which decisions are made and information is shared.

Understanding the allocation of resources within a school district and in certain schools is relevant to multiple stakeholders because money allocation influences principals, teachers, and students. Looking at the decision making process and how leaders understand Title III policy within this school district may strengthen how they make their decisions. It is important to school and district leaders themselves, as it provides valuable insight with regard to funding the ELL program and its impact on students. In this chapter I summarize the findings of the study and discuss implications for practice and research. I conclude the chapter with my final thoughts.

Summary of Findings

Professionals in Radcliff School District know little about the federal policy they are implementing. All participants were familiar with the term Title III, but few were able to explain its intent or how it is implemented within the school district. The
guidance provided by state officials changes periodically after a change in federal government employees who interpret that policy. This follows the trend of punctuated equilibrium discussed in chapter two. With the sudden policy burst and subsequent gradual changes, discussed in chapter two, allocating and spending the money is an ongoing process with new guidelines and clarifications being made all the time. The current process of decision-making regarding Title III money does not follow the Rational Actor Model due to participants being bounded by previous routines, time restrictions, limited information, and other roadblocks. The concept of bounded rationality applies to the school district and those who are in it due to the bureaucratic structure of the school system at the local and state level as well as outside influences such as the Department of Justice and the United States Department of Education.

At the school level, principals and department chairs would like to know more about the Title III funding and spending process so that they can take advantage of the opportunities presented and also so they can add their input to the decision-making process. One participant at the school level said he wished that the school district leaders would do a needs assessment before spending the money so that they could learn what the schools and students need before spending money on things they do not need or will not use. The time frame for hearing about Title III opportunities and filing the appropriate paperwork is too short. The schools would like to see the funding go more toward instructional supplies and supplemental materials; yet, with the guidance from the state and federal governments in addition to the settlement with the Department of Justice, the school district is required to focus the majority of their attention on...
professional development with the hope that if the teachers are well prepared, more students will benefit. Because there is an almost equal and quite substantial local outlay of funds to support ELL learning, choices may be accommodated in the final analysis, but how these choices unfold and how most influences them in similarly unclear

Decision-making seems more guided by criteria related to compliance and efficiency than to the espoused goals of improving teaching and learning for ELL’s, particularly in relation to meeting the dictates of state and federal policy actors. The ESOL program leaders appear to be following a logic of appropriateness in the decision making process, spending the money in a way that they think will be deemed acceptable while following the rules set by the state and federal entities. The director is trying in earnest to spend the money in ways that will benefit the schools by looking at the strategic plan and trying to determine where the need is, however the critical element is that she is not consulting with the schools while making her decisions. The time line mandated for decisions is deleterious to effective and efficient outcomes. At the district level, choice is restricted to preferred or pre-ordained solutions informed to some degree by teacher or school demands as measured by their election to use services or materials included in the district’s grant. There is no evidence that choice is informed by optimizing gains in student learning.

**Understanding Policy**

Radcliff School District central office leaders attempt to make sense of Title III policy while working through the grant writing process, the spending process, and the allocation of funds. They learn about the policy as they go through the steps of grant
writing, receiving funds, spending the funds, and allocating them to the schools that participate in grant funded programs or initiatives. They understand Title III as a policy but how to implement it is ambiguous, and they seem to be making sense of the policy as they act and as they receive on-going feedback from state officials. They intend to follow the guidelines and recommendations of the state and federal government but on several occasions have been corrected during audits or investigations by federal agencies. This leads to the decision choice being taken away and meeting the goals of the organization become less important than following the rules or guidelines of the policy and settlement agreement.

Sensemaking concerning Title III policy is ongoing, and participants are constantly learning and adjusting based on the guidance they are given from others. They make sense of the policy as they go through the motions of planning, placing the money, and initiating spending processes but because the interpretation is always changing, participants may not fully understand what it is they are doing.

**Decision Making Process**

Not many people are involved in the decision making process for Title III fund use. According to participants, the director writes the grant and makes decisions on what is requested with grant funds based on her interpretation of the needs of the school district. She does touch base with her superiors to keep them apprised of what she is doing; however, according to other participants interviewed she does not ask the opinions of teachers, principals, or others within the ESOL central office department while writing
the grant. This is especially odd in a system that has a long tradition of site-based management.

The Rational Actor Model embedded in the law and used here as a lens to look at decision making in RSD does not accurately describe the process that was observed. There is a presumption that decisions are made in a rational manner in which the goals of the organization are considered and the best method of reaching those goals is chosen. Yet, ESOL program leaders seem only to consider compliance of the Department of Justice and are satisficing in order to accomplish tasks. Value maximizing decisions would directly impact student learning thus meeting the AMAO targets of ELL students reaching academic and English proficiency. Although many of the prescribed allowable expenses may impact student learning, there has not been an assessment of effectiveness so their impact is not known. In other words, rather than evaluating decisions based on goals, compliance is used as a primary criterion of effectiveness and efficiency. The criteria used when making decisions are focused on compliance -- staying within the parameters of what is an allowable expense and being sure to only purchase goods or provide services that supplement current educational practices.

Title III money may not be used to buy the same thing for ESOL students that non-Title III money is buying for mainstream students. This in itself may create confusion for the director during the grant writing process due to the structure of site-based management in Radcliff School District. Principals in Radcliff are able to use their budgets in whichever way will benefit the school. That means every single principal purchases different goods for their school so finding resources that have not already been
purchased by principals to supplement instruction may be difficult. The fine line between supplementing versus supplanting is constantly a factor in the decision making process. It is unclear how or if the director communicates with principals to glean information related to these decisions. This limited communication fits the parameters of bounded rationality from both the director and the school principals’ roles. The principals’ decisions are bounded or constrained by the ESOL director naming programs and offering pre-selected, limited choices to the schools, and the ESOL director’s choices are bounded because of her lack of communication and collaboration with school principals to find out what they need and what they want.

An unintentional consequence of the Department of Justice investigation is that the decision-making process shifts away from making value-maximizing decisions, that is to say, meeting the goals of the organization of student learning, and instead focuses on meeting the requirements set forth in the settlement agreement. The director satisfices in order to comply with the suggestions from the settlement agreement and therefor is not making the most value maximizing decisions for the ELL students in the district.

**Allocation of Title III Funds**

The consequences of the decision-making in Radcliff School District is that some students and some schools are receiving programs or services paid for by Title III funds and not all schools take advantage of grant funded opportunities. One consequence of the decision-making process is few people are involved and few people understand the intricacies of the Title III policy and implementation. Principals and teachers know that
they get things from the grant, but they are not involved in the decision-making process and therefore do not know how to access grant-funded opportunities or goods.

**Unanticipated Findings**

Something that surprised me was the flexibility of funding once the grant was written and approved. The fact that the director has the ability to move funds within categories based on the demand of the principals, schools, and students was surprising but convenient. The fact that she is able to leave open certain opportunities for any school that wants to participate seems generous; however, given the findings related to school-level personnel awareness of and confusion about Title III funding, schools may not be actually aware of the opportunities that are available and the work required for them to take advantage of the grant opportunities may be prohibitive.

Another thing that surprised me was the ability of the director to trade funds with principals in order to achieve program goals. The fact that several schools received Title III money to fund materials such as smart boards and other supplemental classroom materials, in exchange for the schools’ local funds paying for the ESOL summer school seemed in sharp contrast with the general theme of worrying primarily about compliance as a criterion for decision making. While such a process may be legitimate within the letter of the federal regulations, it may also be that the district is not following the spirit of the federal accountability rules, i.e., the expenditure of federal funds may be supplanting local expenditures. Yet, this demonstrates the capacity of local leaders to deal with the constraints imposed on their decision making in order to allocate funds to
programs that are believed to be most consequential to student learning, begging the question whether such remedies might be available in other instances.

**Implications for Research and Practice**

Overall, this study suggests that the Rational Actor Model does not apply to decisions being made within this school district. School leaders are typically unable to consider choice alternatives because of time constraints, limited information, and pre-existing routines and are bounded in their rational decisions. The focus of meeting the espoused goals of the organization is not as important a complying with state or federal requirements. Additionally, the outcomes of those decisions are not evaluated so the effectiveness of how money is spent regarding student achievement is not considered. This finding is significant because achievement for all students is the purpose of the No Child Left Behind Act, and why Title III exists. The main goal of the policy itself gets lost in the bureaucratic procedure and compliance. Although compliance to the state and federal government is necessary, one would expect the student achievement goals to be at least equally important.

Title III funding is a necessary component of ESOL program management and implementation. In order for school districts to continue to operate, Title III money must continue or increase to meet the increasing demands and expectations of NCLB. If researchers want to continue looking at Title III and how funding is impacting students I would suggest several follow-up studies to this one.

**Implications for Research**
This study provided information about how decisions are made related to Title III within one school district. Though other studies discussed in chapter one looked at program implementation and accountability, they did not look at the processes that school leaders go through when making their decisions. What I learned is that the ESOL program within the school district remains faithful to accountability and implementation but does not consider how their decisions impact student achievement.

In the future, generalizability of these findings may be addressed through a comparative study that looks at how school districts within the state manage Title III money and how the process looks in those districts in order to establish similarities and differences and see if those practices impact student achievement. It would be interesting to see if the Rational Actor Model describes the decision process in other districts. It would also be beneficial to continue to examine the decision making processes of Radcliff School District in a longitudinal study to see if there were changes in how decisions are made over time, specifically after the Department of Justice settlement agreement expires. This study suggests that there should be a study at the state level that looks at how state education leaders communicate the expectations and guidelines to the school districts and how the state evaluates the use of funding related to ELL education.

Locally, demands and expectations required by the state and the DOJ settlement take their toll on the employees of the school district. While so much money is being poured into professional development for teachers, I wonder what the ESOL teacher retention rate is in Radcliff School District and if it has changed due to the settlement agreement. The additional professional development and time commitments that go
along with training may take their toll on employees who know that other districts to not require as much professional development.

**Implications for Policy**

School leaders in all districts need to maintain focus on what is important: student achievement. The goal of promoting student achievement should constantly be considered when making decisions. Policy makers and state legislators must be sensitive to the impact of complex and rapidly changing ambiguous legislation and strive to create legislation and guidelines that are easy to interpret and implement. The grant writing and funding allocation process needs to be streamlined to make it more transparent and easier for those involved. Additionally, the interpretation of the legislation should not change based on who holds political office at that time.

Subsequent to finalizing this dissertation, a letter was released by the Department of Justice regarding ELL education (United States Department of Justice, 2015). Informally known as the Dear Colleague letter, this document has policy implications, though it is not policy. It shows that a federal agency is aware of the discrepancies between and within school districts related to the use and effectiveness of Title III funding. The letter highlights previous litigation and legislation about student civil rights and makes suggestions “to assist SEA’s [State Education Agencies], SD’s, [School Districts] and all public schools in meeting their legal obligations to ensure that EL students can participate meaningfully and equally in educational programs and services” (United States Department of Justice, 2015 p. 2). The guidance provided also suggests how school districts should spend their Title III allocation.
While potentially helpful, guidance such as this leaves open a significant question that poses a dilemma for policy makers, namely the degree of uniformity expected or allowed related to how federal funds are used at the local level. Identifying allowable expenditures, on the one hand, credentials certain research-based programs and practices. On the other hand, this also implies that there are specific uses of funding that can work to address any achievement gap existing in any school system eligible for Title III funding. Flexibility is inherently reduced at the local level, precisely constraining those most knowledgeable about and able to deal with the learning needs and circumstances of specific children. Balancing flexibility and accountability is an inherent issue in all education policy; how this balance is struck is a significant issue related to Title III.

**Implications for Practice**

This study demonstrates how important it is to communicate goals and plans between and among staff so they can be included in the decision making process or at least be made aware of what is going on so that they are informed about how money meant for students is being spent. It would be sensible if the ESOL program director communicated better with schools and principals to align program and school goals and learn about the needs of the students at each school. There seems to be a contradiction within the county related to the ideals of site-based management as described in the district’s budget handbook with the practices that are occurring. The suggestion of a needs assessment by one of the participants is particularly insightful because it shows that the participants at the school level are not asked their opinion about Title III. School district leaders should communicate more effectively with the staff in the schools to
allow them more time, and more information about the programs and services available through Title III. Including others in the decision making process, to the extent possible, would be consistent with site-based practice and provide needed information for improving decision outcomes. This would also allow better coordination of federal money expenditures and local/state expenditures while being accountable for allowable expenses.

At this time in Radcliff, money is tracked for the district as a whole, but the bookkeeper and the central office leaders were unable to identify what schools were receiving services, which were participating in certain activities or even the monetary amount that flows into each school. At the basic level, these data are needed to know if the schools with the higher number of ESOL students are receiving more Title III benefits than the schools with a lower number. Under the current system, not every school is benefiting from Title III funds, and the consequence of this is uncertain.

Finally, while Title III money is spent on ESOL students in certain allowable ways, money that comes from local and state funds is given to schools and the ESOL program office. The bookkeeper mentioned that there were more Title III funds than local funds yet both amounts of money were significant (approximately $1.2 million of local and state funds and $1.7 million of Title III funds). How local and state funds are spent was not the focus of this research yet it may be beneficial for the ESOL program leaders to consider how that money is spent when making their decisions because there may be more freedom with those funds, as opposed to Title III funds. Additionally, a follow-up
study to differentiate the two pots of money and how they are distributed might be interesting for school leaders and policy makers alike.

**Final Thoughts**

Researching this school district and writing this dissertation was an eye-opening learning experience. Not only in the art of conducting research but also learning about the inner workings of a large school district such as Radcliff. This has taught me that communication and clear expectations are necessary for effective leadership and to better meet the goals of the organization. Most participants interviewed are eager to be involved in the process and would probably have valuable input but have not yet been asked.

I think it would be better to make sure that there is more equity across the school district with Title III money reaching the schools and the students that need it as opposed to the ones that simply take advantage of the opportunities. That being said, the programs that are in place may not be beneficial because there has not been a formal unit of analysis to see if or how they impact student learning.
# Appendix A

## Timeline of Legislation or Litigation Impacting English Learners

<table>
<thead>
<tr>
<th>Event</th>
<th>Implications</th>
</tr>
</thead>
<tbody>
<tr>
<td>Meyer v. Nebraska (1923)</td>
<td>Ruling: it is acceptable to educate immigrant youth in their native language</td>
</tr>
<tr>
<td>Civil Rights Act (1964)</td>
<td>Title VI prohibited discrimination in government programs that receive federal funds</td>
</tr>
<tr>
<td>Elementary and Secondary Education Act as Amended (1968)</td>
<td>Had the first official bilingual education policy in the BEA (Title VII) *first piece of legislation that formally recognized the needs of ELLs</td>
</tr>
<tr>
<td>Lau v. Nichols (1974)</td>
<td>Ruling stated that providing equal access to education for those who do not speak English was not enough.</td>
</tr>
<tr>
<td>Plyler v. Doe (1982)</td>
<td>Ruling stated that all school age children were entitled to a free public education regardless of their immigration status</td>
</tr>
<tr>
<td>NCLB 2002</td>
<td>Requires all students meet the same</td>
</tr>
</tbody>
</table>
Title III part A of this bill is specifically for ELL students and provides funding to help school divisions accommodate these students.
## Appendix B

### Interview Log

<table>
<thead>
<tr>
<th>Date (oldest first)</th>
<th>Type (observation, interview, etc.)</th>
<th>Participant</th>
<th>Site/Location</th>
<th>Time (how long)</th>
</tr>
</thead>
<tbody>
<tr>
<td>10/03/13</td>
<td>Interview</td>
<td>Associate Superintendent for Student Learning and Accountability</td>
<td>Central Office</td>
<td>43:27</td>
</tr>
<tr>
<td>10/10/13</td>
<td>Interview</td>
<td>Director of ESOL</td>
<td>Central Office</td>
<td>1:05:57</td>
</tr>
<tr>
<td>10/28/13</td>
<td>Interview</td>
<td>ESOL Administrative Coordinator</td>
<td>Central Office</td>
<td>23:06</td>
</tr>
<tr>
<td>11/06/13</td>
<td>Interview</td>
<td>High School Administrator</td>
<td>High School</td>
<td>15:52</td>
</tr>
<tr>
<td>11/12/13</td>
<td>Interview</td>
<td>Supervisor of EL Instruction</td>
<td>Central Office</td>
<td>30:07</td>
</tr>
<tr>
<td>11/13/13</td>
<td>Interview</td>
<td>High School Department Chair</td>
<td>High School Classroom</td>
<td>3:30</td>
</tr>
<tr>
<td>12/19/13</td>
<td>Interview</td>
<td>Book Keeper</td>
<td>Central Office</td>
<td>46:43</td>
</tr>
<tr>
<td>01/28/14</td>
<td>Interview</td>
<td>Middle School Administrator</td>
<td>Middle School</td>
<td>25:07</td>
</tr>
<tr>
<td>02/21/14</td>
<td>Interview</td>
<td>Director of ESOL</td>
<td>Central Office</td>
<td>1:06:52</td>
</tr>
<tr>
<td>03/12/14</td>
<td>Interview</td>
<td>Elementary School Administrator</td>
<td>Elementary School</td>
<td>09:17</td>
</tr>
</tbody>
</table>
Appendix C

Questions for Central Office Staff Members: Associate Superintendent for Student Learning and Accountability, ESOL Program Director, ESOL Administrative Coordinator, Director of Finance, and the ESOL Bookkeeper

Background

1. Please state your name and your job title.

2. How long have you been in your position?

3. Tell me a little bit about your educational background and interests

Decision making and Sensemaking

4. Title III of the No Child Left Behind Act is a grant program specifically for ESL and migratory students. How do you acquire these funds?

   • Are you the person who actually writes and submits the grant? Who is involved in this process?

   • Is there anyone who supervises your work on the grant proposal?

   • What are some of the challenges you face in writing this grant?

   • How much money are you guaranteed through Title III funds?

5. What can Title III money be used for?

   • Can you provide some examples of services that are paid for through Title III funding?

     ○ How do you make sure all of the money that can be used, is used?
• Do you feel you are able to successfully meet the needs of ELL students with Title III funds?

6. How is Title III money used in this school district?

7. Understanding policy is sometimes difficult as different people interpret it in different ways. How do you make sense of the Title III policy?
   • What happens when there is a disagreement over the interpretation of the policy?
   • Is there a higher authority to whom you appeal when there is a disagreement?
   • What kind of support is available from the state in the form of understanding and implementing Title III policy?
   • Do you ever work with or consult colleagues in other school districts who have a similar responsibility?

8. Can you tell me about the process of allocating funding meant for ESL students to schools?
   • What happens when you are notified that you have been approved for the funds?
   • How does the school district decide how to allocate resources?
   • Are resources allocated in dollar terms, or are schools given goods and services?

9. Who or what do you consult when making decisions regarding the purchasing of resources?

10. Who do you speak with regarding what types of purchases you make?
    - (if needed) The superintendent? The school principals? The ESOL teachers themselves?

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11. Who or what contributes to the spending process and the distribution of goods/services?

12. Do you have any discretion or flexibility with how Title III funds are used?

13. Do you have to justify your decisions in any way? How so?

14. How do you ensure that resources are being used properly across the school district?
   - What checks and balances are in place regarding the allocation of funding?

15. How do you receive feedback from those that are directly impacted by Title III funds?

16. Do you have ideas about how the whole process might be improved?

**Wrap-Up**

17. Is there anything that you would like to talk about that we have not discussed or any questions you think I should have asked?

18. Is there anybody that you think would be helpful for me to speak to regarding Title III funding in this district?

**If needed probes for certain questions:**

- How do you know?
- Why did that happen?
- Why did you come to that decision?
- What happened?
Appendix D

Questions for Principals and ESOL Department Chairs

1. How many ESOL students do you have in your school?

2. How are Title III funds allocated within this school district?

3. Do you know approximately how much money the school district is given for this grant?

4. Has your school benefited from Title III funded programs, professional development, or instructional materials?

5. If yes, in what way? If no, why not?

6. Could you say approximately how much Title III money reaches this school?

7. Could this school benefit from extra funds for ESOL instructional programs?

8. How would you like to see Title III funds distributed?

9. What is your understanding of Title III policy? Are you able to make sense of it?
   If no, who do you go to for guidance?

If needed probes for certain questions:

- How do you know?

- Why did that happen?

- Why did you come to that decision?

- What happened?
Appendix E

Sensemaking and Decision-Making with Title III of NCLB
INFORMED CONSENT

RESEARCH PROCEDURES
My name is Megan Lynch and I am a doctoral student at George Mason University. I am requesting your participation in research as a part of my doctoral dissertation. This research is being conducted to understand the elements of sensemaking and decision making in the allocation of money from Title III funds of NCLB. Research procedures include observations of meetings in which the budget decisions for Title III money are discussed as well as reviewing documents related to the allocation of Title III funds. Due to your experience and role at the research site, you would be a valuable contributor of information as well. If you agree to participate, I will conduct an interview that will last between 45 minutes and an hour and ask questions related to Title III procedures, funding, allocation, and use of money within the school district. The interview will be recorded. Recordings will be discarded once they are transcribed and analyzed. Your name, the name of your school and the name of the district will not be used in published documents.

RISKS
There are no foreseeable risks for participating in this research, as names of individuals and the research site will remain anonymous.

BENEFITS
There are no benefits to you as a participant other than to further research in education leadership and policy. In addition, the benefits to the research site are to learn about their operating procedures and learn about how Title III funds are impacting student learning and schools.

CONFIDENTIALITY
The data in this study will be confidential. Your name will not be included in the manuscripts of interviews or in other collected data; and you will have the opportunity to select a pseudonym or one will be selected for you. The schools and district will also be given pseudonyms. The data will be stored on a secure, password protected computer and any printed material will be kept in a locked location until it is disposed of.

PARTICIPATION
Your participation is voluntary, and you may withdraw from the study at any time and for any reason. If you decide not to participate or if you withdraw from the study, there is no penalty or loss of benefits to which you are otherwise entitled. There are no costs to you or any other party.

CONTACT
Megan R. Lynch, an ESOL teacher in Prince William County Schools, is conducting this
research. Mrs. Lynch is a doctoral student at George Mason University and she is under the direction of Dr. David Brazer, Graduate School of Education at Stanford University. If you have questions about this study, you may contact me, Mrs. Lynch at mfell@gmu.edu or 703-915-1974 for questions or to report a research-related problem. You may also contact my dissertation advisor, Dr. David Brazer at dbrazer@stanford.edu. You may contact the George Mason University Office of Research Integrity & Assurance at 703-993-4121 if you have questions or comments regarding your rights as a participant in the research.

This research has been reviewed according to George Mason University procedures governing your participation in this research.
Appendix F

Sensemaking and Decision making with Title III of NCLB
INFORMED CONSENT

RESEARCH PROCEDURES
My name is Megan Lynch and I am a doctoral student at George Mason University. I am requesting your participation in research as a part of my doctoral dissertation. This research is being conducted to understand the elements of sensemaking and decision making in the allocation of money from Title III funds of NCLB. Research procedures include observations of meetings in which the budget decisions for Title III money are discussed as well as reviewing documents related to the allocation of Title III funds. I will be observing certain meetings for the majority of the 2013-2014 academic year and will collect data from them only as they relate to the topic of interest. The meetings will be recorded. Recordings will be discarded once they are transcribed and analyzed. Your names, the names of your schools, and the name of the district will not be used in any published documents. Observations are only to learn about information regarding how federal money for ELL students is used.

RISKS
There are no foreseeable risks for participating in this research, as names of individuals and the research site will remain anonymous.

BENEFITS
There are no benefits to you as a participant other than to further research in education leadership and policy. In addition, the benefits to the research site are to learn about their operating procedures and learn about how Title III funds are impacting student learning and schools.

CONFIDENTIALITY
The data in this study will be confidential. Your name will not be included in the manuscripts of interviews or in other collected data. The schools and district will also be given pseudonyms. The data will be stored on a secure, password protected computer and any printed material will be kept in a locked location until it is disposed of.

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Megan R. Lynch, an ESOL teacher in Prince William County Schools, is conducting this research. Mrs. Lynch is a doctoral student at George Mason University and she is under the direction of Dr. David Brazer, Graduate School of Education at Stanford University.
If you have questions about this study, you may contact me, Mrs. Lynch at mfell@gmu.edu or 703-915-1974 for questions or to report a research-related problem. You may also contact my dissertation advisor, Dr. David Brazer at dbrazer@stanford.edu. You may contact the George Mason University Office of Research Integrity & Assurance at 703-993-4121 if you have questions or comments regarding your rights as a participant in the research.

This research has been reviewed according to George Mason University procedures governing your participation in this research.
Appendix G

Observation Protocol

Date of Observation:

List of Participants:

Title of Meeting:
Reason for Meeting:
Primary speaker:
Primary message:

Discussion:

Decision:

Result:
Other:
Appendix H

Coding Index

Decision making (Rational Perspective):
- Organization
- Individual
  - Structure/ Role
  - Goals
- Goals
  - Federal
  - State
  - Organizational (School District)
  - ELL Department
  - Individual
- Alternatives
- Consequences
- Value Maximizing Alternative

Bounded Rationality
  - Time Constraint
  - Limited Information
  - Routinization
  - Satisficing
- Logic of Appropriateness
- Logic of Consequences

Sensemaking
as a process
as a product
  Understanding
  Interpretation
  Implementation
  Action
  Reflection
Appendix I

August 22, 2013

Megan Lynch
2025 S. Quincy Street
Arlington, VA 22204

Dear Ms. Lynch:

This letter is to inform you that your request to conduct research on how
allocates federal funding for English language learner students has been approved by
administration. Approval has been granted and is subject to final authorization given by
principals of any schools involved. The following stipulations apply to the approval:

- All information disclosed by participants regarding Title III funding and procedures must be
done in accordance with policy and guidance.
- All participants will grant permission before the researcher attends, observes, and/or
records meetings with the exception of meetings in a public forum such as School Board
meetings.
- Any reference to the Division and participants involved in the study would be done using
pseudonyms to maintain anonymity.
- Principals may be contacted for selection of specific schools.

Participation by all parties is voluntary requests a copy of the findings from the research
when it is complete.

We wish you success with your study.

Sincerely,

[Signatures]

Supervisor of Program Evaluation
Institutional Review Board
Application Form

Instructions:
1. OTI certification (www.otiprogram.org) must be completed for all team members at the time of application submission.
2. Complete all sections and required addenda. Submit one complete package with all enclosures to IRB@gmu.edu or through campus mail MS605.
3. Projects with funding/proposed funding must include a copy of the grant/application or proposal.
4. Research may not begin until you have received notification of IRB approval.
5. Handwritten and incomplete forms cannot be accepted.

1. Study Title: Sensemaking and Decision Making with Title III of NCLB

2. Study Investigators
   A. Principal Investigator (must be faculty/staff and meet PI Eligibility, University Policy 4012)
      Name: Dr. David Brazer         Department: College of Education and Human Development
      Mail Stop: 4C7                Phone: 703-993-3634          E-mail: sbrazer@gmu.edu
   B. Co-Investigator/Student Researcher
      Name: Megan R. Lynch         Department: Education Leadership
      Mail Stop/Address: 2025 S. Quincy Street Arlington, VA 22204 Phone: 703-915-1974
      E-mail: mfelg@gmu.edu
   C. Are there additional team members? No ☐ Yes ☐ If yes, attach Addendum J to list additional team members
   D. Do any investigators or team members have conflicts of interest related to the research? No ☐ Yes ☐ If yes, explain

3. Study Type: ☐ Faculty/Staff Research ☐ Doctoral Dissertation ☐ Masters Thesis
               ☐ Student Project (Specify ☐ Grad or ☐ Undergrad) ☐ Other (Specify)

4. Complete Description of the Study Procedures
   A. Describe the aims and specific purpose of the study: The purpose of this study is to determine how a single school district allocates federal funding for English language learner (ELL) students. I want to learn how Title III of the No Child Left Behind Act is implemented within a school district, specifically the purchased goods and services that are used for ELL education. This study will show how ELL program leaders make sense of the Title III policy, what factors contribute to the decision making processes of ESL program leaders, and how Title III money is allocated. This research is being conducted to understand the elements of sensemaking and decision-making in the allocation of money.
   B. Provide a COMPLETE description of the study procedures in the sequence they will occur including the amount of time each procedure will take (attach all surveys, questionnaires, standardized assessment tools, interview questions, focus group questions/prompts or other instruments of data collection). After receiving permission from George Mason University's Institutional Review Board and the school district to conduct the research, I will contact each of the potential participants via email (initial email that will be sent to participants is attached) to explain the purpose and intent of the study and ask if they are willing to participate. If they agree, I will be able to start gathering data via interviews (interview questions for various participants are also attached) and will begin to attend meetings for observations (observation field note protocols are attached).
C. Describe the target population (age, sex, ethnic background, health status, etc.): The targeted population of participants are people currently employed by the school district who make decisions regarding Title III funding. They are of various ages, sex, ethnicities, etc and will be chosen to participate in this study on the basis of their role in the school district and their willingness to participate in the study.

1. Summarize the inclusion/exclusion criteria for participation in the study: Leaders within the participating school district who make decisions regarding funding for ELL students and programs will be asked to participate.

2. Are there any enrollment restrictions based on gender, pregnancy, race or ethnic origins? ☑ Yes ☐ No If yes, please describe the process and reasons for restriction(s):

3. Do you have a relationship to any participants? ☑ Yes ☐ No If yes, please describe how you will manage any possibility of undue influence: I am employed by the school district where this study will take place, but participants are not responsible for my professional evaluation and I do not provide any feedback or supervision to them. I do not regularly interact with participants.

4. Estimated number of subjects (may use a range): 12

5. Estimated amount of total participation time per subject: 45 minutes to an hour of interview, and sharing of archival documents. Participants will also be observed in a variety of locations including school board meetings, team meetings, and department meetings all of which are open to the public.

D. Where will the study occur (list all study sites and collaborators)? The central office of a school district and three schools within that same district

E. Describe other approvals that have been/will be sought prior to study initiation (facility authorizations, biosafety review, IRB approval from collaborating institutions, etc.): Approval is pending from the participating school district and research will not begin until that approval has been granted.

5. Recruitment and Consent

A. Describe the processes used for selecting subjects and the methods of recruitment, including use of advertising. Include when, how, and by whom the subjects will be recruited (attach all recruitment materials including flyers, emails, SONA posting, scripts, etc.)? The criteria for the participants will be based on the job title and role they hold in the school district and I will select them based on purposive sampling. I will interview people whose job descriptions or roles include making decisions about federal, state, and local funds. School district central office leaders and several site level administrators including high school principals and ELL department chairs will be interviewed because they all have valuable information regarding how Title III money is used within the district. As I begin working with participants, there may be an opportunity to expand my participant pool based on the recommendations of participants.

During the interview process I will ask if they recommend that I speak to anyone else that may be able to answer my research questions.

B. Describe the consent process including how and where the consent will take place, who will conduct the consent process, and information that will be discussed with and distributed to subjects (attach all consent documents): Prior to being interviewed, participants will be given informed consent. Once they have read the document and agree to participate, the interview will begin. A copy of the informed consent will be retained by participants.

C. Is a waiver of signature of Informed Consent being requested? ☑ Yes ☐ No If yes, complete the following:

1. This waiver is being sought because (check one):
   ☐ The only record linking the subject and the research would be the consent document AND
the principal risk would be potential harm resulting from a breach of confidentiality.

☐ The research presents no more than minimal risk of harm to subjects AND involves no procedure for which written consent is normally required outside of the research context.

2. Explain why the waiver of signature is being requested:

6. Privacy & Confidentiality
   A. How will you protect the privacy of the participants and the confidentiality of the data obtained?
      The participating education agency will be given a pseudonym as well as any schools visited within that district. Individual participants will also be given pseudonyms. Original documents, interviews, and observation notes will be kept confidential but the school district will have access to the final report and can release findings at their discretion but not until the completion of the research.
   B. What individually identifiable information will be collected? No individual identification information will be collected other than recorded interviews in which the participants will be recorded with the use of pseudonyms.
   C. Where will the data be stored (Copies of records should be stored on Mason property)? On the researcher’s personal computer that is password protected, on the recording device, and in a private locked location accessible only to the researcher.
   D. How long will the data be stored? Throughout the duration of the data collection and until the dissertation is completed. Between three years and five years.
   E. What, if any, are the final plans for disposition/ destruction of the data [data must be retained for at least 3 years after the study ends]? The data that is stored on the computer will be deleted from the hard drive, the audio of the interviews will be disposed of/deleted after they are transcribed and coded.
   F. Will results of the research be shared with the participants? ☒ Yes ☐ No If yes, describe how this will be accomplished: The results from the research will be shared with the participating education agency and they can share the information gained as they wish (upon completion of the study). The research will be available for them to use at their discretion once the study is complete.
   G. Will individually identifiable information be shared with anyone outside of the research team (if yes, please explain and be sure to include this information in the consent form)?
      ☒ Yes ☐ No If yes, please explain:

7. Risks
   A. Summarize the nature & amount of risk if any (include side effects, stress, discomfort, physical risks, psychological and social risks): There are no foreseeable risks for participating in this research, as names of individuals and the research site will remain anonymous.
   B. Estimate the probability if any (e.g. not likely, likely, etc.) that a given harm may/will occur and its severity: No harm is likely to occur due to this research to any of the participants nor to the school district being studied.
   C. What procedure(s) will be utilized to prevent/minimize any potential risks? Complete discretion will be used to prevent identifiable information from the participants to be released. They will be given pseudonyms and will remain anonymous.

8. Benefits
   A. Describe any probable benefits (if any) of the research for the subject(s) (Do not address compensation in this section): There are no benefits to the participant other than to further research in education leadership and policy. The benefits to the research site are to learn about their operating procedures and learn about how Title III funds are impacting student learning and schools.
   B. Describe the benefits to society and general knowledge the study is likely to yield: This study will
9. Financial Information

A. Is there any external funding for this project? ☐ Yes ☑ No
   If yes, funding agency ___________________________ and OSP proposal # ________________ (attach grant application)
B. Are there financial costs to the subjects? ☐ Yes ☑ No If yes, please explain:
C. Will subjects be paid or otherwise compensated for research participation? ☐ Yes ☑ No
   If yes, please respond to the following questions:
   1. Describe the nature of any compensation to subjects (cash, gifts, research credits, etc.):
   2. Provide a dollar amount/research credit amount, if applicable:
   3. When and how is the compensation provided to the subject?
   4. Describe partial compensation if the subject does not complete the study:
   5. If research credit, what is the non-research alternative to research participation?

10. Special Topics

A. Will the study involve minors? ☐ Yes ☑ No
   If yes, complete addendum A
B. Will the study involve prisoners? ☐ Yes ☑ No
   If yes, complete addendum B
C. Will the study specifically target pregnant women, fetuses, or neonates? ☐ Yes ☑ No
   If yes, complete addendum C
D. Will the study involve FDA regulated drugs (other than the use of approved drugs in the course of
    medical practice)? ☐ Yes ☑ No
   If yes, complete addendum D
E. Will the study involve evaluation of the safety or effectiveness of FDA regulated devices? ☐ Yes
    ☑ No
   If yes, complete addendum E
F. Will false or misleading information be presented to subjects (deception)? ☐ Yes ☑ No
   If yes, complete addendum F
G. Will participants be audio or videotaped? ☐ Yes ☑ No
   If yes, complete addendum G
H. Will the research involve other potentially vulnerable participants (e.g. disabled or addicted
    individuals, populations engaging in illegal behavior)? ☐ Yes ☑ No
   If yes, complete addendum H
I. Will the research be conducted outside of the United States? ☐ Yes ☑ No
   If yes, complete addendum I

11. Investigator Certification

I certify that the information provided in this project is correct and that no other procedures will be
used in this protocol. I agree to conduct this research as described in the attached supporting
documents. I will request and receive approval from the IRB for changes prior to implementing these
changes. I will comply with all IRB policies and procedures in the conduct of this research. I will be
responsible for ensuring that the work of my co-investigator(s)/student researcher(s) complies with
this protocol. I understand that I am ultimately responsible for the entire conduct of this research.

[Signatures]

Principal Investigator Signature ___________________________ Date ________________

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Addendum G – Audio or videotape

1. Describe the use of audio or videotape (including purpose): Interviews with participants will be audiotaped using a hand-held digital voice recorder, uploaded to the researcher’s computer and later transcribed so that the interview analysis and coding procedures can be more precise and accurate.

2. If the audio/video tape consent is separate from the informed consent discuss method of audio/video consent and attach consent form: The informed consent forms for both interview participants and those present at the observations include information about being audio recorded.

3. What are your plans for storage of the audio/video taped material during the course of the data collection? I will audio tape the interviews and observations of meetings. Both sets of data will be uploaded to a secure computer where the files will be stored. They will be deleted off the recording device as soon as they are uploaded. The password protected computer with the audio files and transcripts of interviews will be kept in a secure, locked location.

4. What are the plans for ultimate disposition or storage of the audio/video taped material (ensure that this information is included in the consent form)? Upon completion of the study, the data will be held for several years and then disposed of by being deleted from the hard drive of the computer.
To Whom It May Concern:

My name is Megan R. Lynch and I am a doctoral student at George Mason University and a teacher within this school district. I am requesting your participation in research as a part of my doctoral dissertation. This research is being conducted to understand the elements of sense making and decision making in the allocation of funds received from Title III funds of NCLB. My specific request is to interview you for approximately 45 minutes to learn more about Title III allocation and expenditures in this school division. Research procedures also include observations of meetings in which the budget decisions for Title III money are discussed as well as reviewing documents related to the allocation of Title III funds.

If you agree to participate, I will ask questions related to Title III procedures, funding, allocation, and use of money within the school district. The interview will be recorded and later transcribed for the purpose of analysis and upon completion of the study the audio recording and the transcription will be destroyed. You will be given a pseudonym for the interview and there will be no specific references to you in any published material. The interview questions will only relate to your professional role and the procedures that take place within the school district.

Thank you for your time and consideration. I would be happy to answer any questions you may have about the study or myself and I look forward to hearing from you.

Sincerely,
Appendix K

Virginia Department of Education
Office of Program Administration and Accountability
P. O. Box 2120
Richmond, Virginia 23218-2120

A. COVER PAGE
Title III, Part A, Language Instruction for Limited English Proficient and Immigrant Students
2013-2014 Individual Program Application
Elementary and Secondary Education Act of 1965 (ESEA), as amended by the No Child Left Behind Act of 2001—Public Law 107-110

To be Completed by School Division

<table>
<thead>
<tr>
<th>Applicant (Legal Name of Agency)</th>
<th>Division Number</th>
<th>Title III Coordinator</th>
</tr>
</thead>
<tbody>
<tr>
<td>Mailing Address (Street, City or Town, Zip Code)</td>
<td>Mailing Address: same as applicant address</td>
<td></td>
</tr>
<tr>
<td>Phone (cell)</td>
<td>Fax</td>
<td>Phone (work)</td>
</tr>
</tbody>
</table>

2013-2014 Title III, Part A Allocation: $1,782,108.74
LEP Award Amount: $1,518,796.10
LV Award Amount: $183,351.64

Place an “X” in the box if the division is the Consortium Lead School Division.

If checked, divisions must complete the “Immigrant and Youth” tab, in red, to describe the Immigrant and Youth Program.

LOCAL EDUCATIONAL AGENCY CERTIFICATION

Use of Funds: The applicant designated above applies for an allocation of federal assistance as appropriated under ESEA. Funds are available to support local education reform efforts that are consistent with statewide education reform efforts to: 1) provide funding to implement promising education reform programs and school improvement programs based on scientifically-based research; 2) provide a continuing source of innovative and educational improvement; 3) meet the educational needs of all students; and 4) develop and implement education programs to improve student achievement and teacher performance.

Specific uses of funds for this application are found in the “Guidelines, Instructions, and Assurances” document located on the Department of Education’s Web site at:


Assurances: The local educational agency assures that the Title III, Part A, program will be administered and implemented in compliance with all applicable statutes, regulations, policies, program plans, and applications. Additionally, the local educational agency agrees by signing below to implement the general and program specific assurances located in the “Application Guidelines, Instructions, and Assurances” document. The assurances and signed cover page are to be retained at the division level.

Title III, Part A
2013-2014 Individual Application
Certification: We hereby certify that, to the best of our knowledge, the information contained in this application is correct. The agency named above has authorized us as its representatives to file this application, and such action is recorded in the minutes of the School Board meeting held on March 20, 2013.

<table>
<thead>
<tr>
<th>Superintendent’s Signature</th>
<th>Board Chairperson’s Signature</th>
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<tbody>
<tr>
<td>Superintendent’s Name</td>
<td>Board Chairperson’s Name</td>
</tr>
<tr>
<td>Date</td>
<td>Date</td>
</tr>
</tbody>
</table>

Application Submission, Approval, and LEA Expenditure of Funds: In order for the funds to be expendable by July 1, 2013, the electronic application must be received at the Virginia Department of Education by July 1, 2013, through the file submission process of the Online Management of Education Grant Awards (OMEGA) system.

An Award Notification is issued by the Virginia Department of Education through OMEGA once an application is fully approved and the allocation is available.

Page 1
## APPLICATION INFORMATION

<table>
<thead>
<tr>
<th>2012 - 2013 Allocation</th>
<th>2012-2013 Consolidated</th>
<th>PROGRAM</th>
<th>2013 - 2014 Allocation Total</th>
</tr>
</thead>
</table>

1. **Title III, Part A, Limited English Proficient**: Total of \(a + b + c + d + e\), only 4. or only 2.  
   - **a.** LEF Subgrant  
     - Not part of a consortium  
     - Total of all consortium member allocations  
   - **b.** LEF Subgrant  
     - Consortium Lead  
   - **c.** LEF Subgrant  
     - Subtotal  
   - **d.** Subtotal  
   - **e.** Subtotal

## REVISIONS AND AMENDMENTS

Place an "X" in the box indicating whether it is a revision or amendment. Provide an explanation for all programs in one cell per revision or amendment, including the location of the changes. (i.e. tab num. cell A75, row 101, etc.)

1. **Revision**  
   **Amendment**
   - For Supers. memo 20K-13 released 9.6.13, H. funds were allocated to [SID]. The grant revision includes IVT projects and use of funds.

2. **Revision**  
   **Amendment**
   - For Supers. memo 033-14 released 2.13.14, LEF funds are by 54,750%. The added allocation appears in Object code 1000 for smart phones monthly svc current in meeting program design

3. **Revision**  
   **Amendment**
   - Summer High School News/2nd class needs to be expanded by 1 class for ELP level 2; reference object code 1000, section D, Overview

4. **Revision**  
   **Amendment**
   - Expand career development courses for IV to include English Learners ages 18-22; Blended IV and LEF Funds; reference section F, number 7, object code 1000

5. **Revision**  
   **Amendment**
   - Blended funding for Division 7 ESLC, College Information Night; Blended IV and LEF funds; Reference section F and p.23 IV

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*Note* 2013-2014 Individual Application
Title III funds cannot be used for core programs and services and core language programs and services for ELLs that are required under other local, state, and federal laws to include Title I of the ESEA, Title VI of the Civil Rights Act of 1964, and the Lau v. Nichols U.S. Supreme Court decision of 1974. Among core programs and services and core language programs and services are the following:

- identifying, screening, placing, and assessing ELLs
- implementing effective, scientifically-based instructional programs and services to meet ELL academic and language needs;
- engaging qualified personnel to provide core instruction or core language instruction to ELLs as required by federal, state, or local laws;
- providing school-level, division-level, state, or federal information that is (not specific to Title III) to the parents of ELLs in, to the extent practicable, in a language the parents understand;
- implementing effective monitoring of formerly ELP students (Level 6, Year 1 and Year 2); and
- purchasing or administering the annual English language proficiency (ELP) assessment or providing training to administer the ELP assessment.

Items included in the budget sections of the Title III application must align with the program descriptions in the local plan provided in the Program Overview section.

<table>
<thead>
<tr>
<th>OBJECT CODE</th>
<th>EXPENDITURE</th>
<th>LEP Subgrant</th>
<th>Immigrant and Youth Subgrant</th>
<th>FTEs</th>
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<tbody>
<tr>
<td>940</td>
<td>Personal Services</td>
<td>Administration</td>
<td>192,954.56</td>
<td>19,842.80</td>
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<tr>
<td></td>
<td></td>
<td>Teachers</td>
<td>379,902.74</td>
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<tr>
<td></td>
<td></td>
<td>Support Professionals</td>
<td></td>
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<tr>
<td></td>
<td></td>
<td>Other</td>
<td>2,07,902.83</td>
<td>127,677.85</td>
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<tr>
<td></td>
<td>Total Personal Services</td>
<td></td>
<td>616,056.28</td>
<td>146,720.85</td>
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<tr>
<td>940</td>
<td>Employee Benefits</td>
<td>Fixed Charges</td>
<td>24,140.77</td>
<td>11,520.51</td>
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<tr>
<td></td>
<td></td>
<td>(Administrative and Instruction)</td>
<td>186,251.72</td>
<td>6,378.70</td>
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<tr>
<td></td>
<td>Total Employee Benefits</td>
<td></td>
<td>210,372.25</td>
<td>17,999.21</td>
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<tr>
<td>4000 Purchased Contracted Services</td>
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<tr>
<td>Supportive Services (Ind., Direct)</td>
<td></td>
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<tr>
<td>EVALUATION SERVICES</td>
<td></td>
<td></td>
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<tr>
<td>Professional Development</td>
<td>338,220.00</td>
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<td>Other</td>
<td>37,000.00</td>
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<tr>
<td>Total Purchased Contracted Services</td>
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<th>5000 Internal Services</th>
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<td>POST Transportation</td>
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<td>Fuel Services</td>
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<td>Other</td>
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<td>Total Internal Services</td>
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<table>
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<th>6000 Other Charges</th>
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<td>Total (Grant Administrative)</td>
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<td>Maintenance of Plant</td>
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<td>Security of Plant</td>
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<tr>
<td>Indirect Cost</td>
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<tr>
<td>Other</td>
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<tr>
<td>Total Other Charges</td>
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</table>

<table>
<thead>
<tr>
<th>7000 Materials and Supplies</th>
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<td>Total Materials and Supplies</td>
<td>87,037.45</td>
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<table>
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<tr>
<th>8000 Capital Outlay</th>
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<tbody>
<tr>
<td>Total Capital Outlay</td>
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</table>

**TOTAL SUBMISI BUDGET** | 1,538,756.00 |
**TOTAL ALLOCATION** | 1,702,110.74 |

Note: Object codes 7000 and 9000 are not used in application budgets or in requests for reimbursements for this federal grant.

Note: Expenses for parent involvement programs are to be incorporated into the appropriate object code(s) based on the category of the related charge.
C. DETAILED BUDGET BREAKDOWN

Include a detailed breakdown of the budget categories for Object Codes 1000-6000 and 8000, as shown on page 10.

**DETAILED BUDGET DESCRIPTION OF OBJECT CODE 1000**

If applicable, indicate the positions and FTEs supported with funds from this program.

Blended pool costs include: FTE 5.0 in Perng Specialist, FTE 2.2 for Perng Coord, & 8 for Perng Sup. totaling FTE 8.0 grant-funded toward 11.0 EISOL

Perg II positions. Filty rate noncontract time for cert. staff is $25/hr for grant activity planning & execution, FEP instructr salary, & curriculum wrk such as SOL & ASOL standards dev, OD course dev. Filty rate for OD wrk & delivery is $35/hr. Substitute tchr costs, full (902) or half (346) day.

Summer school & off-contract supplemental pay for cert. staff, including ret. EISOL teachers, at $35/hr for 6 hrs pay & $25/hr for full Academic year & summer mentors at $30/hr. Temp secrty/tchr help toward the grant execution is $13/hr or the contractual rate, to cover PD support. Funds include interpreting & translating servs for Title IIIA activities. Bookkeeper costs represent the 2% administrative cap. Blended funding for new school-based parent liaison positions on EISOL & local funds and blended local/FY funding for existing positions at 15 schools according to the ratio of FY students to student membership. Blended funding for teachers for Career Dev courses.

<table>
<thead>
<tr>
<th>Item Description</th>
<th>Funding Source</th>
<th>FTEs</th>
<th>Total Cost</th>
</tr>
</thead>
<tbody>
<tr>
<td>Grant-funded cert staff incl summer school site coordinator, TAs</td>
<td>LEP Funds</td>
<td>8</td>
<td>578,028.51</td>
</tr>
<tr>
<td>Filty tchr rates: w/abh plng, curs dev @ $25/hr, w/abh divry-cm @ $30/hr</td>
<td>LEP Funds</td>
<td></td>
<td>138,730.00</td>
</tr>
<tr>
<td>Hourly tchr rate @ $10/hr for 250 hrs of early intervention services</td>
<td>LEP Funds</td>
<td></td>
<td>5,850.00</td>
</tr>
<tr>
<td>Teacher substitutes for FEP trainings, projects, OD, conferences</td>
<td>LEP Funds</td>
<td></td>
<td>24,199.00</td>
</tr>
<tr>
<td>Hourly rate for interpretation and translation for Title IIIA activities</td>
<td>LEP Funds</td>
<td></td>
<td>5,000.00</td>
</tr>
<tr>
<td>Filty rate for assn, temp secret @ $10/hr</td>
<td>LEP Funds</td>
<td></td>
<td>19,700.00</td>
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<tr>
<td>Partial booker eqts @ 2% of LEP Award minus total benefits @ $29,835/yr</td>
<td>LEP Funds</td>
<td></td>
<td>23,209.77</td>
</tr>
<tr>
<td>HS newcomer 3 course instructor over 6 wks: 6 hrs/day @ $30/hr</td>
<td>LEP Funds</td>
<td></td>
<td>21,243.00</td>
</tr>
<tr>
<td>Print Liaison, Tit- Mentee, Tutoring, Print Advt &amp; Career Dev Lehr</td>
<td>Immigrant and Youth Funds</td>
<td></td>
<td>146,720.00</td>
</tr>
</tbody>
</table>

Total for Object Code: **9.0**

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**DETAILED BUDGET DESCRIPTION OF OBJECT CODE 2000**

Indicate the fixed charge categories (such as FICA, health, etc.) and specify the amount of each.

FICA benefits are allocated towards the supplemental hours of work for teachers and paraprofessionals. In addition, benefits for the 7.1 positions are based on the standard [REU] amount as follows: 7.6% FICA, 12.1% VOS, 2.9% [REU] retirement, and 7.8% health. FICA benefits for Title IIIA positions of Counseling Coordinator and 3 parent liaisons; FICA for certified tutors, temps, mentors, and parent academic teachers.
<table>
<thead>
<tr>
<th>Item Description</th>
<th>Funding Source</th>
<th>Total Cost</th>
</tr>
</thead>
<tbody>
<tr>
<td>Benefits for the 8.0 position at about 100% actual</td>
<td>LEF Funds</td>
<td>182,331.25</td>
</tr>
<tr>
<td>FICA for all teacher and paraprofessional supplemental pay</td>
<td>LEF Funds</td>
<td>17,150.95</td>
</tr>
<tr>
<td>Benefits for the bookkeeper costs at salary or 2% of 30,000.53</td>
<td>LEF Funds</td>
<td>6,090.53</td>
</tr>
<tr>
<td>FICA for 1Y grant activities</td>
<td>Immigrant and Youth Funds</td>
<td>17,999.29</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Total for Object Code</td>
<td></td>
<td>228,281.98</td>
</tr>
</tbody>
</table>
### JUSTIFICATION FOR PROFESSIONAL DEVELOPMENT - OBJECT CODE 2000

If program funds are expended for professional development, justify such expenditures by demonstrating a relationship between the proposed expenditure for professional development and the program services and activities described in the application. Please indicate how these funds will support any services and activities that are described in this application.

PD activities/training is extremely expensive to the school district and for ESG. Leads to adoption of a scientifically-based research/ best practices including: WIDA, Kagan, TSOL, ASCD, CAL, Early Childhood, Assessment, SPED, Parent Trainings, admin & SE teachers, VESA Conf. (oral course through GMU & JMU to lead to ESL certification. Costs for vendors for comprehensive training in Key EL techniques & cultural incorporations). Workshops & conferences. Funding for monthly testing agents for cell phones and PD dedicated copies for student test copies.

<table>
<thead>
<tr>
<th>Item Description</th>
<th>Funding Source</th>
<th>Total Cost</th>
</tr>
</thead>
<tbody>
<tr>
<td>Tuition-free courses @ (CO) college tuition for chil in ESL lab</td>
<td>LEP Funds</td>
<td>52,500.00</td>
</tr>
<tr>
<td>Conf reg for TESOL, ASCD, WIDA, VESA, &amp; training by prof Kagan, CAL</td>
<td>LEP Funds</td>
<td>6,000.00</td>
</tr>
<tr>
<td>TESOL State Conference reg for agents, shared staff, specialists, presenters</td>
<td>LEP Funds</td>
<td>15,000.00</td>
</tr>
<tr>
<td>Specialized ESL and ELL workshops for all educators, admin, ESL leaders &amp; parents</td>
<td>LEP Funds</td>
<td>80,000.00</td>
</tr>
<tr>
<td>Building-based ESO. Program Enhancement Plan &amp; Implementation</td>
<td>LEP Funds</td>
<td>30,000.00</td>
</tr>
<tr>
<td>Tenders to train consta in EL techniques (ASCD, MCESI, XVPP)</td>
<td>LEP Funds</td>
<td>48,543.31</td>
</tr>
<tr>
<td>Monthly service fee for phones.</td>
<td>LEP Funds</td>
<td>5,727.69</td>
</tr>
</tbody>
</table>

Total for Object Code: 224,230.51

### DETAILED BUDGET DESCRIPTION OF OBJECT CODE 2000

Provide a description of evaluation services or other expenditures related to purchased or contracted services that are not related to the professional development described above.

Publishing Company consultants will provide training in material use for implementing ELLs materials and WIDA in Prune Protocol. CAL and Finance contracted for DHR school-wide training. External outsourcing of translations for Title IIA ESO. Program document, Funding for svo-staff and DEEDP meetings to provide refreshments and materials. A continued subscription to Culturegramas for District-wide use as a resource. The Literacy initiative is expanded to establish building-based ESO. Program Enhancement Plans which may include consultation services to result in high quality instruction, effective program design through scheduling structures that meet ELL needs for academic and language support, and to include ESO. Program evaluation to identify strengths, needs, and recommend research-based expert practices necessary for ELLs to meet achievement expectations. Contractual services to create and run own online professional development on instructing ELLs and to create digital workbooks. Student leadership conference costs to be funded with local funds based on the FY fund/student ratio.

For FY, 2013-14 Individual Application
<table>
<thead>
<tr>
<th>Item Description</th>
<th>Funding Source</th>
<th>Total Cost</th>
</tr>
</thead>
<tbody>
<tr>
<td>Subscriptions to Culturagram annual fee</td>
<td>LEP Funds</td>
<td>$13,925.00</td>
</tr>
<tr>
<td>Translation Title 3 forms, parent communie ps 2 lang by exstd agencies, postal exp</td>
<td>LEP Funds</td>
<td>$5,000.00</td>
</tr>
<tr>
<td>Trng ELL Literacy, e.g., ELL teachers, Reader Theatre Writers' Workshop, WIDA Prime</td>
<td>LEP Funds</td>
<td>$10,000.00</td>
</tr>
<tr>
<td>CAL and Pearson SEOP cohorts</td>
<td>LEP Funds</td>
<td>$50,000.00</td>
</tr>
<tr>
<td>Develop &amp; run online Web L2 Trng Modules</td>
<td>LEP Funds</td>
<td>$30,000.00</td>
</tr>
<tr>
<td>Consulting, SPED/ELL, scheduling, job-embedded support, ESL, prg eval,</td>
<td>LEP Funds</td>
<td>$40,000.00</td>
</tr>
<tr>
<td>Summer high school field trips transportation cost</td>
<td>LEP Funds</td>
<td>$2,000.00</td>
</tr>
<tr>
<td>Student Language field trips transportation &amp; overnight expenses, and Student Expo cost for</td>
<td>Immigrant and Youth Funds</td>
<td>$11,000.00</td>
</tr>
<tr>
<td></td>
<td>Total for Object Code:</td>
<td>$162,055.00</td>
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</table>
### JUSTIFICATION FOR INTERNAL SERVICES - OBJECT CODE: 4000

If program funds are expended for internal services, describe these services below:

<table>
<thead>
<tr>
<th>Item Description</th>
<th>Funding Source</th>
<th>Total Cost</th>
</tr>
</thead>
<tbody>
<tr>
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</table>

Total for Object Code: $0.00

### JUSTIFICATION FOR TRAVEL COSTS - OBJECT CODE: 5000

Travel must be justified by demonstrating a relationship between the proposed travel and the needs of the program. Please indicate the estimated cost and the estimated number of people attending:

The $50 grant-funded RSD Program Staff is to provide consultative services to all K-12 RSD schools and all central offices. Travel to and from the sites for individual, small and large group presentations, workshops, courses, and trainings is a potential travel need. Intra-county travel as it relates to their positions and the professional development responsibilities they need to provide to others throughout RSD. Some external travel for RSD administrative staff, ESDU staff, and content teachers serving ELLs to regional and state meetings, and other professional development as needed. (RSD) policy/procedures for this in conjunction with the VDOE requirements for travel reimbursement will be followed. Travel costs will be covered for consultants providing services in RSD to benefit ELLs.
<table>
<thead>
<tr>
<th>Item Description</th>
<th>Funding Source</th>
<th>Total Cost</th>
</tr>
</thead>
<tbody>
<tr>
<td>Intra-school division tti of FTE 8.0 gram-funded specialists/coord, travel related to FTE</td>
<td>LEP Funds</td>
<td>10,000.00</td>
</tr>
<tr>
<td>Travel exp for cont for FTE 8.0 EBSOL prog staff, and admin (hotel, airfare, travel)</td>
<td>LEP Funds</td>
<td>10,000.00</td>
</tr>
<tr>
<td>Consultant Travel</td>
<td>LEP Funds</td>
<td>10,000.00</td>
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Total for Object Code: 30,000.00
### DETAILED BUDGET DESCRIPTION FOR OBJECT CODE 5000

If applicable, indicate indirect costs charged to this program. Indirect costs cannot be claimed against capital outlay and equipment.

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<th>Item Description</th>
<th>Funding Source</th>
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<tbody>
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Total for Object Code: $0.00

### JUSTIFICATION FOR MATERIALS AND SUPPLIES - OBJECT CODE 6000

Provide a description of materials, supplies, and all equipment less $5,000 per unit. Indicate the estimated quantity of each item.

Cost for K-12 academic: dictionaries, math manipulatives, ormitt academic high interest readers, graph paper, IEP/504, & literacy shifting materials; Summit schs K-12 newcomer class materials for ELP/Pk 1 & 2. Prof resource materials such as ISOP/WIDA, ACCESS/ASCD & CAL: TEP start-up & replacement materials; readers for ELL: Family Literacy & Kinder biling/acy. Blind finding for Tech for Instr SpEd/s role (projector, Ipads, laptops, mice, Iphones) 6 subs identified for ESOI Enhancement Plan (software subscriptions and programs, SmartBoards, Ipads, Ipods, Kindles) increase ELL Literacy. ESOI, LaBesp summer retreat expenses to include materials & meals. SEB Coalition mtg materials & refreshments. Blind info puch in ref. for ESOI, staff in PD role.

<table>
<thead>
<tr>
<th>Item Description</th>
<th>Funding Source</th>
<th>Quantity</th>
<th>Total Cost</th>
</tr>
</thead>
<tbody>
<tr>
<td>K-12 Summer sch mls (textbooks, readers, binders, journals, suppl)</td>
<td>LEP Funds</td>
<td>6,000.00</td>
<td></td>
</tr>
<tr>
<td>Adapted texts, graph novels, K12 resources for trage/bilinguacy, mandated</td>
<td>LEP Funds</td>
<td>1,500.00</td>
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</tr>
<tr>
<td>Wholshp mls: CPKs/TL/En/SOS/WS/Wo, new KID/ESOL tools, TAs</td>
<td>LEP Funds</td>
<td>5,231.37</td>
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</tr>
<tr>
<td>ILL Parent materials, supplies, curric, interpretation headsets</td>
<td>LEP Funds</td>
<td>4,000.00</td>
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</table>

Total ELL Part A
2013-2014 Individual Application
<table>
<thead>
<tr>
<th>Item Description</th>
<th>Fund</th>
<th>Amount</th>
</tr>
</thead>
<tbody>
<tr>
<td>Tech, pads, iPods, smart phones, accessan</td>
<td>LEF Funds</td>
<td>1,000.00</td>
</tr>
<tr>
<td>Tmt. mthr. for NCLB proj. food, mpl incl. thumbnails, CD's, pref res</td>
<td>LEF Funds</td>
<td>3,000.00</td>
</tr>
<tr>
<td>Printing Costs for Training materials, student information, translations</td>
<td>LEF Funds</td>
<td>1,270.50</td>
</tr>
<tr>
<td>Literacy building materials for IGKZ schools all $175 per school</td>
<td>LEF Funds</td>
<td>16,239.00</td>
</tr>
<tr>
<td>Slwres e.g., BAZ Kaka, READTHO, E-Libraries, large lang. System.44</td>
<td>LEF Funds</td>
<td>48,366.66</td>
</tr>
<tr>
<td>School-based tutoring program supplies &amp; materials</td>
<td>Immigrant and Youth Funds</td>
<td>7,725.10</td>
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<tr>
<td></td>
<td>Total for Object Code</td>
<td>94,262.53</td>
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</table>
All capital outlay expenditures over $5,000 per unit must be approved in advance by the Department of Education. If the school division has established a threshold of a lesser amount, items equal to that amount or greater must also receive prior approval by the Department of Education. Equipment quantities must be specified.

<table>
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<tr>
<th>Item Description</th>
<th>Funding Source</th>
<th>Quantities</th>
<th>Total Cost</th>
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Total for Object Code

0.00

0.00

DETAILED BUDGET DESCRIPTION FOR OBJECT CODE 8000

Provide a description for expenses related to object code 8000 not included in the justification above.

<table>
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<tr>
<th>Item Description</th>
<th>Funding Source</th>
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<th>Total Cost</th>
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Total for Object Code 0.00 0.00

Page 8
EXPENDITURE ACCOUNTS DESCRIPTIONS

These accounts are for budgeting and recording expenditures of the educational agency for activities under its control. Below are definitions of the major expenditure categories. The descriptions provided are examples only. For further clarification on the proper expenditures of funds, contact your school division budget or finance office, the grant specialist in the Virginia Department of Education, or refer to the appropriate federal act.

OBJECT CODE DEFINITIONS:

1000 PERSONAL SERVICES - All compensation for the direct labor of persons in the employment of the local government. Salaries and wages paid to employees for full- and part-time work, including overtime, shift differential, and similar compensation. Also includes payments for time not worked, including sick leave, vacation, holidays, and other paid absences (jury duty, military pay, etc.), which are earned during the reporting period.

2000 EMPLOYEE BENEFITS - Job-related benefits provided employees are part of their total compensation. Fringe benefits include the employee's portion of FICA, pensions, insurance (life, health, disability income, etc.), and employee allowances.

3000 PURCHASED/CONTRACTUAL SERVICES - Services acquired from outside sources (i.e. private vendors, public authorities or other governmental entities). Purchase of the service is on a fee basis or fixed time contract basis. Payment for rentals and utilities are not included in this account description. (You can only charge indirect on the first 25,000 of a contract). Allowable payments would be to individual or firms that are independent contractors and not employees of the grantee or subgrantee organization. The word honorarium is sometimes used to characterize such payments; it can be problematic when included in a grant because it can be seen as gratuity. On the other hand the term "fee" is commonly used and will raise fewer questions.

4000 INTERNAL SERVICES - Charges from an Internal Service Fund to other functions/activities/elements of the local government for the use of intergovernmental services, such as data processing, automotive/motor pool, central purchasing/central stores, print shop, and risk management. These services are provided by internal services within the School District and possibly the county but not a vendor.

5000 OTHER CHARGES - Includes expenditures that support the program, including utilities (maintenance and operation of plant), staff/administrative/consultant travel, travel (Staff/Administration, office phone charges, training, leases/rental, indirect cost, and other. Meals for working lunch and dissemination of material is capped at the per diem rate for the meal listed in the state travel policy times the number of persons.
**Note:** Indirect cost cannot be claimed against capital outlay and equipment.

**6000 MATERIALS AND SUPPLIES** - Includes articles and commodities that are consumed or materially altered when used and minor equipment that is not capitalized. This includes any equipment purchased under $5,000, unless, unless the LEA has set a lower capitalization threshold. Therefore, computer equipment under $5,000 would be reported as “materials and supplies.” Food purchased for the program (Parental Involvement and food required for the program).
7000 PAYMENT TO JOINT OPERATIONS - For Annual School Report purposes only. (Not used in application budgets or request for reimbursements)

8000 CAPITAL OUTLAY - Outlays that result in the acquisition of or additions to capitalized assets. Capital Outlay does not include the purchase of equipment costing less than $5,000 unless the LEA has set a lower capitalization threshold.

9000 OTHER USES OF FUNDS - Debt Service and fund transfers, used with governmental funds only (not used in application budgets or request for reimbursements).
References


Biography

Megan R. Lynch graduated from Indiana University in 2005 with a Bachelor of Science in Secondary Education. She graduated from the University of Virginia in 2006 with a Masters of Education in Curriculum and Instruction. She has taught English as a Second Language for nine years in Virginia. Her interests include education leadership, ESL policy, at-risk youth, and student achievement.