

# Federal Programs Handbook

## Social Circle City Schools

Written procedures for the implementation and  
monitoring of Federal Programs

(Title I, Part A; Title I, Part C; Title I, Part D; Title II, Part A; Title III, Part A;  
Title IV, Part A; Title V, Part B; Title IX, Part A-McKinney-Vento Act; IDEA;  
ESSER I/CARES ACT, ESSER II/CRRSA, ESSER III/ARP)

<b>FEDERAL PROGRAMS CALENDAR</b>	<b>8</b>
<b>PURPOSE</b>	<b>10</b>
<b>SECTION 1</b>	<b>11</b>
<b>MONITORING of SCHOOLS and PROGRAMS</b>	<b>11</b>
OVERVIEW	11
MONITORING OF PROGRAMS	12
Audits	12
Audit Finding Corrective Action Procedure	12
Reporting	12
Onsite Procedures	13
Timelines/Schedules	14
Technical Assistance	14
Data Review	14
Reporting and Corrective Actions(s) Processes	15
Verification of Required Corrective Actions	15
Identification of High Risk Schools	15
<b>SECTION 2</b>	<b>16</b>
<b>COMPREHENSIVE NEEDS ASSESSMENT PROCESS TO INFORM THE COMPREHENSIVE LEA IMPROVEMENT PLAN AND SCHOOL IMPROVEMENT/SCHOOLWIDE PLANS</b>	<b>16</b>
COMPREHENSIVE LEA IMPROVEMENT PLAN	16
COMPREHENSIVE NEEDS ASSESSMENT	17
Data Analysis	17
Guidance to Departments and Schools	17
DISTRICT IMPROVEMENT PLAN	18
Amendment of the Plan:	18
Resolution for Unapproved Plans	19
<b>SECTION 3</b>	<b>20</b>
<b>PRIVATE SCHOOLS SERVICES</b>	<b>20</b>
PRIVATE SCHOOLS	20
The following Procedures will occur should there be a future private school express an interest in consultation/participation:	21

Documentation for Participation	21
Identification of Participants	21
Finance	22
Complaints	22
Evaluation	22
Equipment	22
AFFIRMATION OF CONSULTATION WITH PRIVATE SCHOOL OFFICIALS	22
<b>SECTION 4</b>	<b>24</b>
<b>MAINTENANCE of EFFORT, COMPARABILITY, ASSESSMENT SECURITY</b>	<b>24</b>
MAINTENANCE of EFFORT (MOE)	24
COMPARABILITY	24
ASSESSMENT SECURITY	25
Consequences for Violations Related to Assessment Security	26
<b>SECTION 5</b>	<b>27</b>
<b>OVERARCHING PROCEDURES- INTERNAL CONTROLS, EXPENDITURE of FUNDS, INVENTORY, DRAWDOWNS, COST PRINCIPLES</b>	<b>27</b>
INTERNAL CONTROLS	27
EXPENDITURES	28
Requisition Process:	29
PROCUREMENT	31
Method for Conducting Technical Evaluation of Proposals and Selecting Recipients (§200.320(d)(3))	31
Sole Source Vendors	32
Procedures for Sealed Bids/Competitive Proposals	32
CONSULTANTS, CONTRACTS, PURCHASED SERVICES FOR FED. FUNDS	33
PERSONNEL COMPENSATION AND LEAVE	35
Permanent Schedules:	35
Time Sheets:	36
Split-Funded Time Logs:	36
Personnel Activity Reports:	36
Compensation Policy	36
Leave Policy	36
Risk Assessment	39
Reconciliation of Physical Inventory	39
Inventory	39
Maintenance and Repair of Equipment	41

Equipment Disposition Procedure (§200.313(c)(1)(2)):	41
Monitoring of Equipment	42
Missing Equipment Protocol and Adequate Safeguards to Prevent Loss, Damage, or Theft	42
TRANSFERABILITY	42
PROGRAM ACCOUNTING AND RECONCILIATION	43
DRAWDOWNS	43
GRANT APPLICATION PROCESS	45
<b>SECTION 6</b>	<b>46</b>
<b>PROGRAMMATIC REQUIREMENTS</b>	<b>46</b>
GENERAL LEA SELECTION AND ALLOCATION PROCEDURES	46
Procedures for Determining Rank Order Allocations	46
Attendance Area Determinations/Eligible Attendance Area Rankings	46
Eligible Attendance Areas:	47
Rank Order Within Schoolwide Programs	47
Equitable Services for Private School Participation	48
ALLOCATIONS AND CARRYOVER	49
WRITTEN PROCEDURES TO IDENTIFY TITLE I-ELIGIBLE STUDENTS	49
AMENDMENTS	50
CARRYOVER	50
RESERVATION OF FUNDS	50
Professional Development:	50
Neglected and Delinquent Children	52
Equitable Services for Private School Participation	52
Pre-Kindergarten Programs	53
Public School Choice Related Transportation and Flexible Learning Programs	53
<b>SECTION 7</b>	<b>54</b>
<b>NOTIFICATIONS TO PARENTS</b>	<b>54</b>
NOTICES to PARENTS of ENGLISH LEARNERS PARTICIPATING in TITLE I or TITLE III SUPPLEMENTAL LANGUAGE PROGRAMS Section 1112(e)(3)	54
PARENT RIGHT to KNOW TEACHER and PARAPROFESSIONAL QUALIFICATIONS	55
20 DAY NOTIFICATION	55
SCHOOL DESIGNATION STATUS	55
SCHOOL IMPROVEMENT LETTERS AND NOTIFICATIONS STATUS	55
FLEXIBLE LEARNING PROGRAM (FLP) NOTIFICATION	56
CORRESPONDENCE IN OTHER LANGUAGES	56

LEA PARENT & FAMILY ENGAGEMENT POLICY/PLAN	56
<b>SECTION 8</b>	<b>57</b>
<b>PARENT AND FAMILY ENGAGEMENT</b>	<b>57</b>
GUIDANCE: SCHOOL LEVEL PARENT AND FAMILY ENGAGEMENT EXPECTATIONS/PROCEDURES Title I, ESSA - Section 1116	57
PARENTAL ENGAGEMENT POLICIES/PLANS SEC. 1116(b) SEC. 1116(c) SEC. 1116(d) SEC. 1116(e) SEC. 1116(f)	60
PARENT AND FAMILY ENGAGEMENT SURVEYS/INPUT	60
Actions Taken by LEA to Improve the Quality and Effectiveness of Parent and Family Engagement Policies and Practices:	61
Distribution	61
SCHOOL-PARENT COMPACT	62
Parental Input on School Compacts	62
PARENT RESOURCE CENTER (PRC)	63
ANNUAL TITLE I MEETING	63
PARENT CAPACITY/LEA TECHNICAL ASSISTANCE	63
Monitoring of Building Parent Capacity	66
REQUIRED 1% SET ASIDE for PARENTAL ENGAGEMENT	67
BUILDING STAFF CAPACITY	67
Monitoring of Building Staff Capacity	67
<b>SECTION 9</b>	<b>69</b>
<b>TITLE I, PART A</b>	<b>69</b>
<b>IMPROVING the ACADEMIC ACHIEVEMENT of the DISADVANTAGED</b>	<b>69</b>
OVERVIEW	69
TITLE I DIRECTOR JOB DESCRIPTION	69
Federal Programs Secretary	70
ANNUAL TITLE I MEETING	70
DATA ANALYSIS	71
NEEDS ASSESSMENT	71
Components of a Schoolwide Program	72
LEA Schoolwide Guidance	74
Schoolwide Improvement Plan Development	75
Evidence Based Practices and Interventions	75
Definition	75
Implications	76

Feedback on School Improvement Plans	76
Resolution Procedures for Unapproved Schoolwide Improvement Plans	76
Documentation	76
CONSOLIDATION OF FUNDS	77
TECHNICAL ASSISTANCE	77
MONITORING PROCESS for TITLE I, PART A	77
Planning/Data Review	77
Budget	77
Professional Qualifications (in coordination with Title II)	78
Document Review	78
Parent Engagement	78
Reports	78
Corrective Action	78
Collection of Required Documents	79
TITLE I, PART A TARGETED ASSISTANCE SCHOOLS/PROGRAMS	79
COMMUNICATION WITH TITLE I PRINCIPALS and SCHOOLS	79
PRINCIPAL INVOLVEMENT	80
PROGRAM EVALUATION	80
Examples of Uses of Funds in a Schoolwide Program (Based on the Needs Assessment)	82
Examples of Title I Unallowable Expenditures	83
ACADEMIC ACHIEVEMENT AWARDS PROGRAMS	85
<b>SECTION 10</b>	<b>86</b>
<b>TITLE I, PART A SCHOOL IMPROVEMENT GRANT 1003(a) (84.010)</b>	<b>86</b>
<b>SECTION 11</b>	<b>86</b>
<b>SCHOOL IMPROVEMENT 1003(g) SIG (84.377)</b>	<b>86</b>
<b>SECTION 12</b>	<b>87</b>
<b>SERVICES for HOMELESS CHILDREN and YOUTH</b>	<b>87</b>
<b>SECTION 13</b>	<b>88</b>
<b>SERVICES FOR NEGLECTED and DELINQUENT CHILDREN</b>	<b>88</b>
<b>SECTION 14</b>	<b>88</b>
<b>PRE-KINDERGARTEN PROGRAMS</b>	<b>88</b>
<b>SECTION 15</b>	<b>88</b>

<b>CHARTER SCHOOLS</b>	<b>88</b>
<b>SECTION 16</b>	<b>89</b>
<b>TITLE I, PART C MIGRANT EDUCATION PROGRAM SERVICES</b>	<b>89</b>
<b>SECTION 17</b>	<b>90</b>
<b>FOSTER CARE TRANSPORTATION PLAN</b>	<b>90</b>
<b>SECTION 18</b>	<b>92</b>
<b>Title II, Part A: Improving Teacher Quality</b>	<b>92</b>
NEEDS ASSESSMENT and EQUITY ACTION PLAN	92
<b>SECTION 19</b>	<b>96</b>
<b>TITLE III: LANGUAGE INSTRUCTION FOR ENGLISH LEARNERS and IMMIGRANT STUDENTS</b>	<b>96</b>
Private Schools	98
<b>SECTION 20</b>	<b>100</b>
<b>TITLE IV, PART A: STUDENT SUPPORT and ACADEMIC ENRICHMENT</b>	<b>100</b>
<b>SECTION 21</b>	<b>100</b>
<b>TITLE V, PART B: RURAL EDUCATION INITIATIVE</b>	<b>100</b>
<b>SECTION 22</b>	<b>101</b>
<b>IDEA</b>	<b>101</b>
<b>SECTION 22</b>	<b>101</b>
<b>CARL D. PERKINS VOCATIONAL and APPLIED TECHNOLOGY ACT</b>	<b>101</b>
<b>SECTION 23: COMPLAINT PROCEDURES</b>	<b>102</b>
<b>SECTION 24: ETHICS and FRAUD, WASTE, and ABUSE</b>	<b>105</b>
<b>SECTION 25: RECORDS RETENTION</b>	<b>108</b>
Title 34 Code of Federal Regulations Parts 76 § 76.730 –	108

## Federal Programs Staff

<i>Name</i>	<i>Title</i>	<i>Federal Programs Roles</i>	<i>Contact Information</i>
Juanasha Watkins	Student Services Director	Title I-A, II-A, IV-A Director Title III Coordinator McKinney Vento Migrant N and D Foster Care Transportation	Juanasha Watkins <a href="mailto:juanasha.watkins@socialcircleschools.org">juanasha.watkins@socialcircleschools.org</a> Phone: 770-464-3781 Fax: 770-464-4919
Christina Sneed	Director of Special Education	IDEA Director	Christina Sneed <a href="mailto:christina.sneed@socialcircleschools.org">christina.sneed@socialcircleschools.org</a> Phone: 770-464-2731
Yolondias Colquitt	Family and Parent Engagement Coordinator	Family and Parent Engagement Contact	<a href="mailto:yolondias.colquitt@socialcircleschools.org">yolondias.colquitt@socialcircleschools.org</a>
Pam Gauntt	Special Education & Curriculum Administrative Assistant	All Federal Programs Special Education	<a href="mailto:pam.gauntt@socialcircleschools.org">pam.gauntt@socialcircleschools.org</a> Phone: 770-464-2731

## FEDERAL PROGRAMS CALENDAR

<i>Month</i>	<i>Event/Task</i>
July	Submission of CLIP Components
July – September	Development of School-Level Title I Budgets

August	<p>Title I Evidence Due:</p> <ul style="list-style-type: none"> <li>● School Designation Letter</li> <li>● Notification of Parent’s Right-to-Know Professional Qualifications</li> <li>● Parent Letters for Supplemental Language Services (if offered under Title I or Title III)</li> </ul>
August – September	<p>Upon Approval of CLIP, Submit Individual Federal Programs Budgets to GaDOE Begin Implementation of Equity Plan</p>
August – September	<p>Federal Programs Regional Training Sessions</p>
August – October	<p>Administration of Fall Parent Surveys</p>
September	<p>Submission &amp; Revision of Final Title I School-wide Plans Title I Parent &amp; Family Engagement Evidence Due:</p> <ul style="list-style-type: none"> <li>● Annual Parent Meeting</li> <li>● Distribution of LEA and School Parent &amp; Family Engagement Policies</li> <li>● Distribution of School-Parent Compacts</li> <li>● Dissemination of LEA Fraud, Waste, &amp; Abuse and Complaints Policy</li> </ul> <p>Review of Professional Qualifications Review of PL Plans or Goals</p>
October	<p>Private School Consultation</p>
October – February	<p>LEA Self-Monitoring of Schools – On-Site and Document Review</p> <ul style="list-style-type: none"> <li>● Refer to Program-Specific Checklists &amp; Requirements</li> </ul>
November	<p>Checkpoint for Title II-A Equity/Effectiveness Plan</p>
December	<p>Deadline to Comparability, Homeless, and Neglected &amp; Delinquent to DOE Private School Consultation Meeting</p>
January	<p>First Semester Periodic Certifications Due Evidence of Title I Parent Conferences Offered in Primary and Elementary Schools</p>
January – June	<p>LEA System and School Stakeholder Input Sessions for Planning Completion of System and School Comprehensive Needs Assessments Revision of parent and Family Engagement Policy/Plan and Parent-School Compacts</p>

January – May	GaDOE Technical Assistance Webinars, GCEL Conference, & Regional Training Sessions
February - May	Monitor and Update the Professional Qualifications (PQ) Portal
March	Update Recruitment Plans and Annual PQ Reminders
March – May	Administration of Spring Stakeholder Input Sessions and Surveys
May/June	Complete Annual Self-Monitoring Reports for Individual Programs, As Applicable Evaluation of Equity/Effectiveness Plan
June	Signed & Dated Federal Programs Inventory Forms Due 2nd Semester Periodic Certifications Due Submission of Final School-Level Title I, Title III and Title II Documentation Due GaDOE Federal Programs Conference
June - July	Submission of Proposed School-wide Plans, Parent & Family Engagement Plans, & Compacts Final District Improvement Plan Revisions Feedback on School Plans
Ongoing	Training and Technical Assistance for LEA Departments & Schools
Ongoing	Review of Drawdown Reports & Monitoring of Expenditures via Internal Controls
Ongoing	Title I/III Building Parent Capacity Activities (minimum of 2 per semester) Title I/III Building Staff Capacity Activities (minimum of 2 per semester) CNA and CLIP Process (Feedback Available on the Website) Monitoring of Title II-A Equity and Effectiveness Plan Activities

## **PURPOSE**

The purpose of this standard operations procedures handbook is to provide guidance for step-by-step, systematic approaches to managing the rules and guidelines of federal programs to ensure consistent compliance. The information provided may be used by staff to ensure that federal programs are being implemented accurately and effectively.

The step-by-step approach contained in this handbook will promote uniformity in operations as federal programs staff seeks to carry out related duties and responsibilities. The Georgia Department of Education (GaDOE) provides local educational agencies (LEAs) extensive guidance on the overarching requirements for federal programs via the on-site monitoring document that is used to ensure that LEAs are meeting all statutory requirements of federal programs. These specific requirements from the GaDOE document were used to create this handbook. Procedures, local and state Board policies, and checklists are included in this guide.

It is hoped that this guide will be useful to staff as they strive to comply with all federal programs statutory requirements.

## **SECTION 1**

### **MONITORING of SCHOOLS and PROGRAMS**

#### **OVERVIEW**

The Georgia Department of Education requires that the Social Circle City Schools monitor the implementation of Federal Programs and the expenditure of all funds associated with the program.

The following internal controls have been created and designed to provide reasonable assurance regarding the achievement of objectives in the effectiveness and efficiency of operations. The Georgia Department of Education (GaDOE) requires that each Local Educational Agency (LEA) monitor the implementation of federal programs and the expenditure of all funds associated with each program. Monitoring is an essential component of ensuring all facets of federal programs are being implemented as prescribed by the Every Student Succeeds Act (ESSA). It is a process of systematically providing technical assistance and collecting data in order to provide information that can guide program implementation.

Social Circle City School System (SCCS) is a small rural school system, therefore monitoring has never been an issue when it comes to meeting with principals and staff to fully support the particular needs of each school. The Director/Coordinator(s) of Federal Programs meet with central office administrative staff in addition to principals, and bookkeepers, when appropriate, to discuss budget and other federal program implementation requirements.

To that end, each federal program in the Social Circle City School System uses monitoring as a means of observation and recording of activities in participating schools. Critical to this process is the feedback provided to schools that can assist in improving student achievement. The Directors/Coordinators themselves undergo training from GaDOE and other sources to maintain their proficiency in federal program compliance requirements.

System monitoring addresses the following:

- Ensuring that all activities are carried out in accordance with federal compliance guidelines
- Monitoring inventory and equipment usage
- Attainment of academic achievement school improvement goals
- Compliance with budgetary guidelines

## **MONITORING OF PROGRAMS**

### **LEA MONITORING**

The Directors of Federal Programs will monitor program expenditures to verify that all program expenditures comply with federal program requirements. All documentation will be maintained that the LEA may need for future auditing/monitoring according to the LEA Monitoring Form which is issued annually by the GaDOE.

### **Audits**

The annual audit of all funds is conducted by the Georgia Department of Audits (DOAS). At the conclusion of the audit process, all audit findings and recommendation points are presented to the Superintendent and Chief Financial Officer (CFO) in an oral exit report. Following the exit conference the district receives a written copy of all findings and recommendation points. The written report is presented to the Board of Education. In the event a finding is related to a particular program rather than general financial matters, the CFO meets with the program director/coordinator to discuss and establish a corrective (CAP). The Chief Finance Officer (CFO) submits required written responses to all findings. This report is available to the public.

### **Audit Finding Corrective Action Procedure**

At the completion of an audit or monitoring the Social Circle City School System( if required) will develop a corrective action plan to address each finding reported by the auditors.

The status of the corrective action plan will be closely monitored by:

- Chief Financial Officer (CFO) – as related to specific financial issues
- Other Grant Administrators – as related to specific grant guidelines

Either of the above will ensure that all audit findings are resolved in a timely manner.

**Every effort is made to correct the finding immediately or within 30 days of audit completion.**

SCCS will refer to the following for guidance:

- “Financial Management for Georgia Local Units of Administration” (Chapter 38 “The Annual Audit”)
- GDOE Financial Review – Will work with the system to resolve and close audit findings.
- A-133 – Subpart C - .315 “Audit Findings follow up.”

### **Reporting**

Accurate, current, and complete disclosure of the financial results of the federal program is made in compliance with the requirements of the grant. An annual audit of all funds is conducted. At the conclusion of the audit process, all audit findings and recommendation points are presented to the Superintendent and CFO in an oral exit report. Following the exit conference the system receives a written copy of all findings and recommendation points. The written report is presented to the Board of Education. In the event a finding is related to a particular program rather than general financial matters, the Director of Finance meets with the program director to discuss and establish a corrective action plan (CAP). The Finance Director submits required written responses to all findings. This report is available to the public.

## **SCHOOL PROGRAM MONITORING**

Monitoring of participating schools is a critical component of ensuring that compliance is taking place at each school and within each program. The implementation, monitoring, and evaluation of federal programs is an ongoing process, spanning the entire school system. All participating schools are subject to on-site visits during the year to ensure compliance with Federal Program guidelines and regulations. In addition, throughout the year each school receives on-going support through regular on and off site meetings, staff meetings, district level meetings, site visits, phone calls, reports and emails. Feedback is provided to the principals through written and/or verbal communication and conferences. Documentation of professional learning sessions, technical assistance, and meetings is maintained by the schools and by program coordinators. Ongoing monitoring after training is conducted by the appropriate system federal programs coordinator to ensure compliance. Each Federal Program completes self-monitoring documentation that must be submitted and/or retained on an ongoing basis.

At regularly scheduled principals' and other designated meetings, principals have the opportunity to ask questions as well as receive further clarification regarding the requirements of each federal program administered within the district. Information is provided to principals related to the overview of program requirements which may include copies of GaDOE guidance, timelines, budget processes and forms, inventory management, schoolwide implementation, professional learning, parental involvement, fraud and complaint policy and other areas of federal programs as appropriate. Each federal program director provides specific program guidance with documentation guidelines which entails a list of items to be submitted in order to fully meet the requirements of the specific program. In addition, the principals are involved throughout the ongoing Comprehensive Needs Assessment (CNA) process to ensure all federal funds are expended in an optimal manner to achieve the goals within the District Improvement and System Strategic Plans.

Technical Assistance and monitoring feedback are offered at all times through email and phone communication, as well as school visits, to assist schools in analyzing data to identify priorities in instruction, professional learning, and effective budgeting. Principals are informed of the purpose of all federal programs as well as expectations and procedures related to allowable use of funds. District Change Team (DCT) meetings also provide principals with end of the year information and preliminary information related to the upcoming budget year.

### **Onsite Procedures**

On-site monitoring has been found to be the most effective way to fully support the particular needs of each school. Program directors meet regularly with the principal and assistant principal, when appropriate, to discuss budget and other Federal Program requirements, particularly the school improvement and parent engagement plans. Principals have the opportunity to ask questions related to their specific school and needs as well as receive further clarification regarding the requirements of each federal program administered within the system. Copies of program guidance provided by the GaDOE are also shared with principals. Principals are involved throughout the ongoing Comprehensive Needs Assessment (CNA) process to ensure all

federal funds are expended in an optimal manner to achieve the goals within the CLIP and District Improvement Plans (DIP) and School Improvement Plan (SIP).

Plans are checked against checklists provided by the program/department. Budgets are checked for allowable expenses. Feedback is provided verbally and/or in writing. The timeline for monitoring will be followed to ensure compliance with all federal programs. In addition, emails, staff meetings, and phone conversations take place throughout the year as a means of providing ongoing monitoring and communication with each school.

On-site visits from the program directors/coordinators occur during the year and may include classroom or stakeholder meeting observations, staff training, inventory sampling, and/or document review. On-site visits with schools also provide for individual and specific conversations regarding each school's needs. Following visits descriptive feedback is often provided to principals through phone calls, verbal feedback in staff meetings, and e-mail.

### **Timelines/Schedules**

Timelines provide an overview (which may not be all inclusive) of the activities that occur to ensure the successful implementation of the programs and compliance with state and federal regulations. Social Circle City School System Self-Monitoring Checklists and due dates for specific program components are available to all schools to ensure timeliness and adherence to all federal program requirements. Feedback will be provided to the principals either through checklists or verbal and or written descriptive information.

### **Technical Assistance**

Technical assistance is offered at all times through email and phone communication, as well as school visits, to assist schools in analyzing data to identify priorities in instruction, professional learning, and effective budgeting. District Change Team (system and school level leaders) meetings are held which includes a review of the purpose of all federal programs, as well as expectations and procedures related to allowable use of funds. Additional meetings are held to remind principals of end of the year information and to provide preliminary information related to the upcoming budget year. Documentation of professional learning sessions, technical assistance, and meetings is maintained by the appropriate federal program coordinator. Ongoing monitoring after training is conducted by the appropriate system federal programs coordinator to ensure compliance.

### **Data Review**

Data is compiled, reviewed, and discussed during administrative (District Change Team and District Leadership Team) meetings, at teaching and learning meetings with principals and assistant principals, and at Board of Education meetings for the purposes of improving instruction and student learning. Data can include but is not limited to: current student assessment results, stakeholder perception data, attendance data, and process revision. Schools meet internally and analyze data with the intent of improving instruction. Principals review data with their teams to identify and address areas in need of improvement. This information is discussed in detail and included in the updated plans each year. Data helps to identify high risk

schools, populations, and/or specific content areas in need of additional support. All schools have access to system and/or school generated data which is used during the data analysis process.

### **Reporting and Corrective Actions(s) Processes**

At established deadlines, the program director/coordinator reviews evidence of compliance with the ESSA requirements. Likewise, following annual reviews by the Georgia Department of Audits and Accounts as well as monitoring by the Georgia Department of Education (GaDOE), all monitoring reports, audit findings, and/or required corrective actions are reviewed with system and school level leaders. A Corrective Action Plan is submitted to the Georgia Department of Education (GaDOE) if required, and the program director/coordinator is designated to monitor its implementation. In addition, training is used as a preventive measure to ensure compliance with program requirements.

Georgia Department of Education (GaDOE) expectations and requirements are proactively communicated to and shared with leaders. Upon completion of on-site visits and/or a review of documentation program directors note areas in need of completion and/or correction and provides detailed feedback to school principals, clearly articulating required corrective action with due dates.

Corrective actions, findings, areas of concern, and recommendations received through monitoring feedback are discussed with system and school level leaders in order to assist in understanding the critical need for compliance with federal guidelines. Professional learning is provided based on needs. Professional learning may be used as a preventive measure to ensure that all personnel have a clear understanding of all expectations for every facet of the various federal programs. Federal program coordinators, along with other district level staff and outside consultants, provide ongoing training as a means of ensuring that the system and schools are in compliance at all times.

At any time there is a need for corrective action the following steps will be followed:

- The Federal Programs Director/Coordinator will debrief with the administrator to discuss possible corrective actions.
- The Federal Programs Director/Coordinator and Principal/designee will agree on a corrective action with an implementation date.
- The Federal Programs Director/Coordinator will monitor to evaluate the completion of the corrective action plan.

### **Verification of Required Corrective Actions**

Documents are re-submitted for approval, with an appropriate checklist being used to verify that the corrective action has been taken. In the event a school does not submit the correct information or needs to re-submit documentation after redirection and clarification, a meeting is held, a phone call is made, the program director/coordinator visits the school, sends a memo of correction, or emails the principal describing the issue and detailing how to re-submit utilizing the most accurate information. Technical assistance is provided throughout the school year as needed.

### **Identification of High Risk Schools**

A review of student achievement data as well as compliance with federal programs requirements is used to determine high-risk schools. The district uses the Georgia Department of Education (GaDOE) checklists for the Title I Schoolwide Program, Parent & Family Family Engagement Policy, School-Parent Compact, Building Staff Capacity, Building and Parent and Family Document Distribution measures to identify potential high-risk schools or school-specific areas for improvement. No current SCCS has been identified as Priority or Focus schools.

## **SECTION 2**

### **COMPREHENSIVE NEEDS ASSESSMENT PROCESS TO INFORM THE COMPREHENSIVE LEA IMPROVEMENT PLAN AND SCHOOL IMPROVEMENT/SCHOOLWIDE PLANS**

#### **COMPREHENSIVE LEA IMPROVEMENT PLAN**

The GaDOE allows LEAs to submit one Comprehensive LEA Improvement Plan (CLIP) application for funding for numerous federal and state programs. Each year, the LEA submits the CLIP to the Georgia Department of Education in order to receive federal funds. The Directors of Federal Programs serve as the CLIP coordinators for the system. The CLIP is comprised of the Foster Care Transportation Plan, the Comprehensive Needs Assessment (CNA), the LEA Parent and Family Engagement Plan, and the District Improvement Plan. The Migrant Education Program Identification, Recruitment, and Data Collections Plan is not submitted by SCCS, as the system does not receive direct Title I, Part C funding. Through the spring, and summer the federal program coordinators review and revise current year CLIP descriptor narratives, through District Leader meetings.

Superintendent  
Asst. Superintendent(s)  
Principals/Assistant Principals  
Federal Program Directors (Title I, II, III, IV, Homeless Liaison/Migrant Contact, N and D Coordinator, ESOL Coordinator)  
Special Education Director  
Family and Parent Engagement Coordinator  
School Level Administrators  
Teacher Representatives  
System Parent Advisory Committee

CLIP goals are reviewed with parents, principals and district office throughout the year for feedback. Recommendations are reviewed from the feedback of parents at the annual Title I meeting held at primary and elementary schools. Minutes and sign in sheets are maintained for documentation of all meetings. The CLIP, data from the previous year's test scores, and the implementation plans are reviewed and revised, as needed. The CLIP and implementation plan changes are documented through the consolidated application. If revisions are needed, the document is updated to reflect those requested changes after consultation with appropriate

GaDOE federal program contacts. The CLIP is posted on the system's website with ongoing opportunities for electronic feedback .

### **COMPREHENSIVE NEEDS ASSESSMENT**

The Comprehensive Needs Assessment is conducted in the early spring and summer of each school year and reviewed during the principal's meeting prior to the beginning of the new school year. The superintendent, central office program administrators and other crucial staff, principals, and assistant principals, review data from all state-mandated assessments to include Georgia Milestones Assessment System, ACCESS for ELLs, Georgia Alternate Assessment, Georgia Kindergarten Inventory of Developing Skills, SAT, ACT, PSAT, and AP exams. Process, perception and demographic data, including Teacher and Leader Keys Effectiveness Systems reports; annual stakeholder surveys; demographic reports such as Student Record and FTE; and College and Career Ready Performance Index measures, are also part of the Comprehensive Needs Assessment. The Superintendent's Advisory Committee, which also includes parent and community stakeholders, and central office administrators review the data/needs assessments and requirements of all federal programs on an annual basis. These needs assessments drive the action/implementation planning for the upcoming year. The needs assessment includes determining the professional learning needs throughout the Social Circle City School System. The results of this needs assessment determine any prioritized areas of need/inequity and guide the development of the various documents and parts that make up the Comprehensive LEA Improvement Plan (CLIP), Equity Plan (as part of the CLIP), and each schoolwide plan and provide focus for the expenditure of funds. The CLIP components and implementation plan changes are documented through the Consolidated Application, per the guidelines provided by the Georgia Department of Education (GaDOE) Title I Division.

#### **Data Analysis**

All data are disaggregated by sub-group and to the individual student level. The Assessment Director presents data to the board of education at a fall meeting each school year and provides a summary of all test data for leadership and board members. School administrators receive ongoing technical assistance and training in the use of data during regularly scheduled principals' meetings, professional learning sessions, and other system level meetings. During the spring, central office personnel and school-level personnel analyze progress toward targets at both levels and begin to formulate action plans to address the critical needs the data reveals. The data are reviewed with parents and community stakeholders who offer suggestions on the Comprehensive LEA Improvement Plan (CLIP) components – the Comprehensive Needs Assessment and the District Improvement Plan. The District Improvement Plan describes critical issues, goals, timelines, and strategies for implementation. Teachers have access to the most recent as well as longitudinal data through the Statewide Longitudinal Data System (SLDS), ACCESS for ELL's, Georgia Alternative Assessment (GAA), Georgia Kindergarten Inventory of Developing Skills (GKIDS), Teacher and Leader Keys Effectiveness Systems (TKES/LKES) reports, surveys; annual stakeholder surveys, demographic reports such as Student Record and FTE; and specific student needs (i.e., sub-groups as illustrated in the College and Career Ready

Performance Index [CCRPI] measures), and the school system's Measure of Academic Progress (MAP) data.

### **Guidance to Departments and Schools**

The CLIP serves as the plan detailing coordination of various federal programs and identification of needs and in-turn budgeting for such needs with federal funds. The CLIP includes the following components: 1) district CNA report; 2) district improvement plan; 3) parent and family engagement plan; and the 4) foster care transportation plan. Program directors, department specialists, school and system leaders, as well as community and parent stakeholders are involved in the revision process. Parents are included in a variety of face to face meetings to provide feedback and have access to multiple online feedback processes. The system conducts an annual survey each year that allows parents to provide input. Parent input is examined and considered from these surveys and parent stakeholder meetings. Documentation includes sign-in sheets, agendas, meeting minutes, emails, survey responses and returned plans with comments. Feedback is recorded in meeting notes. Several subsequent meetings are arranged to garner input from all stakeholders. For example, input is solicited from district, school, and curriculum leaders at monthly administrative and curriculum meetings. Federal program coordinators gather all input and update the various components of the CLIP. The plan is submitted to the Superintendent for final approval.

### **DISTRICT IMPROVEMENT PLAN**

The District Improvement Plan (DIP), which addresses all federal program funding as well as the state professional learning allocation, defines the academic needs of the district and the aligned strategies to meet the identified goals. Program directors/coordinators work in coordination with external stakeholders to develop the DIP, and the DIP is posted online for community feedback. Budgets are submitted by each program director/coordinator following the approval of the CLIP by each assigned GaDOE program area specialist. In keeping with state and federal guidelines, prior to submitting the federal program budgets, the superintendent signs off on the Consolidated Application denoting agreement with each assurance and certifying the accuracy of the final fiscal reports/vouchers requesting payment contained in the application (2 CFR §200.415).

### **Amendment of the Plan:**

If, after the plan is implemented, there are significant changes in the direction of the plan, an amendment must be submitted by the LEA federal programs to the GaDOE. Following a data review and examination of the fidelity of implementation of the plan, schools and LEA departments that must proceed with a request to amend the School Improvement Plan (School-wide Plan) or DIP must place this request in writing with a rationale for the request. After consultation between the school and between the LEA department and the federal programs contact(s), an amendment will be submitted to the GaDOE for approval by the assigned program area specialist(s) After approval is received, the applicable budget(s) will be amended through the Consolidated Application and, following GaDOE budget amendment approval, the CSI Accounting System will be updated by the accountant to reflect the budget amendment(s).

### CLIP Schedule/Timeline

To ensure timely submittal to the GaDOE, the following timeline must be followed:

- Ongoing - The CLIP is made available on the system website. A feedback survey is provided on the web.
- August-July – The CLIP is made available to parents at each school. A feedback form is available.
- Ongoing– The CLIP components are made available during district parent meetings.
- January -April – The Comprehensive Needs Assessment includes stakeholder meetings at the district and school level to gather feedback and identify priorities.
- May - Review of recommended revisions and adjustments takes place with all stakeholder groups.
- May-June – Changes are made to the CLIP based on feedback obtained from multiple means and stakeholders.
- July – The CLIP is uploaded for GaDOE approval

### **Resolution for Unapproved Plans**

If the GaDOE requests revisions to the CLIP, Equity, or School Improvement Plans, the Directors of Federal Programs retrieve the requested changes from the Audit Trail in the GaDOE portal. The Directors of Federal Programs then communicate with the appropriate school or district based personnel to ensure that requested changes are completed in the consolidated application. The Directors of Federal Programs provides technical assistance as appropriate, makes corrections and/or approves corrections to CLIP, Equity, and/or School Improvement Plans and then resubmits the plans. This process is continued until each plan has been approved by GaDOE.

## **SECTION 3 PRIVATE SCHOOLS SERVICES**

### **PRIVATE SCHOOLS**

The Social Circle City School System currently has no Private Schools that have chosen to participate in the Title program(s). If SCCS ever has a Private School that chooses to participate, all regulations for private school participation will be followed. The private school worksheet will be completed and attached to the Consolidated Application to ensure that all reservations have been included.

Equitable services are provided to eligible private schools that choose to participate in the Title program. If necessary, funds are identified in the district set-aside portion of the Consolidated Application.

The schools would receive an equitable amount from reservations of funds for instructional and related activities before the funds allocating funds to public schools. Equitable services calculated from the applicable district set-asides each year, which are professional learning and parent and family engagement. The amount would be proportionate to the number of private school children from low-income families residing in Title I participating public school attendance areas.

Private schools per pupil allocations would be derived from the proportionality method this year required of each federal program.

ESSA Sections 1117 and 8501

Month	Activity (All Programs, Title I, Part A, Title II, Part A, Title III,)
October in preparation for the next school year (Title I, Part A, Title II, Part A, Title III and Title I Part C, Title IV A, Migrant, if applicable)	<p>-Obtain complete list of all private schools with students who are residents of the Local Education Agency (LEA) .Refer to the DE 1111 form.</p> <p>-Annually, contact officials of private schools with children who reside in the LEA regardless of whether the private school they attend is located in the LEA. (However Title II, Part A, and Title III can only serve students in private schools located in the district’s geographic boundaries.)</p>
November/December in preparation for the next school year	<p>-Participate in a meeting with private school officials, GaDOE officials, and system officials to explain the intent of Federal programs and the roles of public and private school officials and provide opportunities for the private school officials to ask questions.</p> <p>-Review with private school officials the timeline and consultation process. Establish a consultation calendar and procedures for collecting poverty data</p>

	<p>(i.e. data on low-income families) and enrollment data.</p> <ul style="list-style-type: none"> <li>● If available, use the same measure of poverty used to count public school children, e.g., free and reduced price lunch data, directly certified data such as in TANF and SNAP used for Community Eligibility Provision(CEP)</li> <li>● Note: Title II, Part A only requires enrollment data.</li> </ul>
December-Remainder of the year in preparation for the next school year	<p>Follow the Sample Timeline for LEA Federal Programs Coordination and Consultation with Private School Officials (Title I, Part A; Title II, Part A; Title I, Part C; Title III and ESOL) if any Private School opts to participate *Source: U. S. Department of Education, Private Schools Toolkit, 2006</p>

The federal government has issued the following guidelines in determining the eligibility requirements for private schools desiring to participate in federal program services:

**E-1. Which private school students are eligible to receive benefits?**

Private school students who are enrolled in nonprofit private elementary and secondary schools, including those in religiously affiliated schools, located in the LEA generally are eligible to receive services. Some ESEA programs restrict eligibility or participation to a particular group of students, such as LEP students, in which case the eligibility or participation of private school students likewise is restricted. See the GaDOE’s guidance on individual programs for specific eligibility requirements. See also J-1: Federal Resources and Guidance.

**E-2. Does the law require an LEA to provide equitable services to students and teachers in private for-profit schools?**

No. Section 9501(a) of ESEA requires an LEA to provide equitable services to teachers and students in “private elementary and secondary schools.” Section 9101(18) and (38) of ESEA defines “elementary schools” and “secondary schools” to mean “nonprofit institutional day or residential school[s]” that provide elementary and secondary education, respectively.

**The following Procedures will occur should there be a future private school express an interest in consultation/participation:**

**Documentation for Participation**

The private school must provide a copy of their 501(c)3 status.

**Identification of Participants**

The LEA will work closely with the private school to verify the attendance area of possible students. It is the responsibility of the private school to provide potential students’ names, addresses, and verification of free and reduced participation for qualification of the students.

### **Finance**

It would be the responsibility of the LEA to process third vendor work as well as materials via a requisition. No requests for reimbursement will be allowed as all purchases must be approved prior to the purchase. All materials and supplies purchased by the SCCS are the property of the SCCS. At the time the private school no longer participates, the property will be returned to the SCCS. An inventory will be maintained by the school and submitted to the SCCS. The private school will complete an inventory check twice per year as required.

### **Complaints**

Complaints by the private school are filed in compliance with the LEA complaint process (see Complaint Procedure.) All complaints will be addressed within 10 calendar days of filing and will be resolved within 60 days according to the process.

### **Evaluation**

At the end of April, SCCS will ask each participating private school to fill out a survey to evaluate provided services.

### **Equipment**

The private schools will follow the same procedure as Social Circle City School System schools.

## **AFFIRMATION OF CONSULTATION WITH PRIVATE SCHOOL OFFICIALS**

Section 1120(b) of the No Child Left Behind Act and §200.63 of the Title I regulations require a timely and meaningful consultation occur between the local education agency (LEA) and private school officials prior to any decision that affects the opportunities of eligible private school children, teachers, and other educational personnel to participate in programs under this Act, and shall continue throughout the implementation and assessment of activities under this section.

### **The following topics must be discussed during the ongoing consultation process:**

- How the LEA will identify the needs of eligible private school children.
- What services the LEA will offer to eligible private school children.
- How and when the LEA will make decisions about the delivery of services.
- How, where, and by whom the LEA will provide services to eligible private school children, including a thorough consideration and analysis of the views of the private school officials on the provision of services through a contract with a third-party provider.

- How the LEA will assess academically the services to eligible private school children in accordance with §200.10 and how the LEA will use the results of that assessment to improve Title I services.
- The size and scope of the equitable services that the LEA will provide to eligible private school children and, consistent with §200.64, the proportion of funds that will be allocated to provide these services.
- The method or sources of data that the LEA will use under §200.78 to determine the number of private school children from low-income families residing in participating public school attendance areas, including whether the LEA will extrapolate data, if a survey is used.
- The equitable services the LEA will provide to teachers and families of participating private school children.

If the LEA disagrees with the views of the private school officials on the provisions of services through a contract, the LEA must provide the private schools the reasons in writing why the LEA chooses not to use a contractor.

**SECTION 4**  
**MAINTENANCE of EFFORT, COMPARABILITY, ASSESSMENT**  
**SECURITY**

**MAINTENANCE of EFFORT (MOE)**

GADOE compares the fiscal effort of the preceding year to the second preceding fiscal year and makes the maintenance of effort determination available to the system through a marked “met” or “unmet” on the consolidated application. The calculation in the MyGaDOE portal determines which funds should be excluded from the calculation. Documentation for MOE is only required for districts that do not meet the required maintenance of effort. The Federal Programs Director(s) will pull the MOE information from the Consolidated Application each school year for documentation purposes (ESSA Sections 1118 and 8521).

**COMPARABILITY**

Social Circle City Schools does not have any duplication of grades, therefore we do not have to complete comparability of services. Due to our size and population growth, SCCS does not foresee any openings of additional schools in the near future.

Comparability is achieved through the use of two forms of documentation: the October FTE count and the faculty and staff listings from each school. The Director of Support Services DDS (Title I director) annually completes the Comparability of Services utility in the GaDOE portal. During the October CPI data collection, the superintendent, director of human resources, DSS (director of student services), and Assistant Superintendents review the funding sources and job codes for all employees to ensure accuracy. The Title I Comparability Report is submitted annually via the Consolidated Application in December.

To date, all schools have always provided comparable services. In the event that comparability is not met, the DSS (Title I director) will work with school system and school leaders to reassign personnel to ensure comparability of services to students in all Title I Schools.

Effective with the FY18 school year, comparability may be achieved through the equitable distribution of state and local resources to all schools as outlined in the aforementioned Resource Allocation Methodology Plan (RAMP). The RAMP is submitted as an attachment to the Consolidated Application, reviewed by the Georgia Department of Education (GaDOE) staff, and approved.

## ASSESSMENT SECURITY

The Social Circle City School System has a Test Security Plan which addresses consequences for any violation within the plan. The plan is available to employees through faculty meetings and trainings documented with sign-in sheets and agendas. The system Assessment Coordinator trains all school test coordinators on an annual basis regarding the Test Security Plan, the requirements at the school-level, and consequences for violation. Likewise, school test coordinators are required to re-deliver this training, including the consequences for violation of the test security measures. The system utilizes the steps within the Test Security Plan for monitoring and improving the on-going data quality of its assessment system. All employees participating in the preparation or administration of standardized tests are required to sign annually a Test Security Information Form for Examiners/Proctors/Coordinators, and examiners must submit after each test administration a signed Adherence to Procedures form, while principals must submit to the central office after each test administration the signed Principal's Certification of Adherence form.

The Social Circle City School System takes the ethical responsibility to provide secure and appropriate testing environments for its students very seriously. In any state or federally mandated test the SCCS expects its employees to act in accordance to specific guidelines mandated by the test and the general guidelines of the Georgia Department of Education. For every administration of a high stakes assessment the following guidelines will be followed.

- The system test coordinator will stay current on appropriate testing rules and practice by viewing required DOE webinars and reading all manuals and memorandums associated with the test.
- All school test coordinators will be appropriately trained by the system coordinator prior to the assessment window opening.
- School test coordinators will in turn provide mirrored training to all test examiners and proctors who will be taking part in the test.
- Records of participation and sign-in sheets of each of these meetings will be maintained.
- Trainings at every level will include a segment covering testing ethics and ethical behavior in testing environments.
- School Test Test Coordinators and Special Education Team Leaders are required to hold a separate training to review IEPs to ensure accommodations are provided according to IEPs and DOE /District guidelines. This training reviews the array of accommodations utilized for testing.
- Test materials, when on site, will be continuously maintained in a secured and locked room with access limited to only those who are functioning as school test coordinators or assistant test coordinators.
- School campuses will be quiet and organized on the day(s) of testing.
- All Schools are required to send home SCCS's Cell Phone Policy as notification of expectations for parents and students. SCCSs also has a cell phone collection document that will be completed and signed by students who do bring cell phones into the testing environment. Test Administrators are allowed to have their cell phone on their desk, out of sight during testing for emergency use only. They are instructed that at no time during

testing should they be in contact with their cell phone.

- Any irregularity or anomalous event taking place in a school during testing will be promptly and fully reported to the system test coordinator.
- Irregularities involving possibly illegal or unethical actions on the part of an employee will be reported to the Georgia Professional Standards Commission.
- If the anomaly rises to the level of an irregularity it will be promptly reported to the Georgia Department of Education.
- A testing calendar is posted on the Social Circle City Schools website for all parents. Reminder dates are posted on the local school websites and often are posted in the local newspaper. A variety of district resources are used, including but not limited to - School Messenger, school websites, and school marquees.
- When test results are returned they will be disseminated to students and parents in a reasonable time frame.
- Assessment results will be communicated to the public via press releases, sections of the website, and other means as necessary.

### **Consequences for Violations Related to Assessment Security**

Any employee who suspects a breach in assessment security must immediately report the breach to their immediate supervisor. Failure to report suspected breaches in assessment security can have negative implications upon an employee. In addition, any investigation that results in a determination of guilt related to violations of assessment security can result in loss of employment and a report filed with the Georgia Professional Standards Commission, which may result in loss of a teacher's certificate.

**SECTION 5**  
**OVERARCHING PROCEDURES- INTERNAL CONTROLS,**  
**EXPENDITURE of FUNDS, INVENTORY, DRAWDOWNS, COST**  
**PRINCIPLES**

**INTERNAL CONTROLS**

**Allowability Procedures (2 CFR 200.302(b)(7)) 5.1**

Any purchases made with federal funds must follow the guidelines for allowable costs. The Social Circle City School System federal programs will follow guidelines as detailed in EDGAR, 2 CFR Part 200; the Georgia Department of Education (GaDOE)'s Federal Programs Handbook; and memos, letters, and/or communication from the Georgia Department of Education (GaDOE) regarding allowable/unallowable purchases. All federally funded activities must follow the process below to ensure that the program director/coordinator, who has firsthand knowledge of federal and state program implementation requirements, examines requests for allowability (2 CFR §200.302(b)(7), 2 CFR §200.403, 2 CFR §200.432, 2 CFR §200.420-200.475, 2 CFR §200.421, 200.454(a-b), 2 CFR §200.94, 2 CFR §200.453).

The Federal Program Directors will authorize all purchases as outlined in the system's purchasing procedures in advance of all purchases. Program guidelines prohibit the use of federal program funds to: provide incentives to participants, supplant other local, state or federal initiatives, purchase foods (other than light refreshments for extended learning programs not scheduled as part of the regular school year and/or light refreshments for parent and family engagement activities), provide services outside the scope of the program's intended purpose, or purchase other materials or services that are strictly forbidden by federal or state guidelines.

Funding is determined based upon prioritized needs. Federal Program Directors will review proposed activities or items to ensure the guidelines of supplementing are met and to determine allowability. Expenditures must be aligned with budgeted items in the approved grant application. Source documentation is kept on file as required by grant guidelines. The appropriate program coordinator will direct any questionable expense to the GaDOE Area Program Specialist for that program for further clarification.

All purchases and/or contracts shall be awarded contingent upon an appropriation having been made and the availability of funds. All requests for purchases or contracts not provided for in the budget will require prior approval according to the dollar level of the purchase. Purchases from board members or companies in which the board member or a member of his/her immediate family has a controlling interest are prohibited. District staff members are prohibited from directing or approving purchases where there is a perceived or direct conflict of interest with such purchase.

As part of ongoing technical assistance, the CFO and program directors provide training and guidance through emails, meetings, and/or phone calls with school principals on allowability principles, including the requirement that all expenditures must be aligned with needs identified in the Comprehensive Needs Assessment and addressed in the District Improvement or School-wide Plan to support the program's purposes for improving the achievement of the school's lowest-performing pupils. If a cost is not aligned with the CLIP components, program purposes, or District Improvement or School-wide Plan, it is unallowable. Principals develop with their leadership teams School-wide Plans, which are reviewed by the Title I director as a component of the district's monitoring of its schools. Additionally, the Title I director reviews the school-level expenditure requests to ensure all items were included in the CLIP components and School-wide Plans.

### **METHODOLOGY TO ALLOCATE STATE AND LOCAL FUNDS TO EACH SCHOOL:**

Effective in FY18, Title I will use a Resource Allocation Methodology Plan (RAMP) to meet the supplement versus supplant test. To ensure that all schools receive all state and local funding earned, during its annual budget cycle, the system generates a personnel allotment sheet for each school for the next fiscal year. This sheet includes the projected enrollment as well as the number of certificated and non-certificated staff members earned with state and local funds to serve the anticipated enrollment for the coming year.

Federally funded personnel are in addition to the number of teachers required to meet maximum class size as determined by the system locally as part of the Strategic Waivers School System contract with the GaDOE. Moreover, the system provides each school with an instructional materials budget based upon the prior fiscal year's October FTE count. FTE program weights are applied to ensure that specialized instruction such as REP, EIP, CTAE, and special education is funded with state and local funds at a rate commensurate with program needs. Therefore, a school's instructional materials budget is computed by multiplying the number of FTE by the predetermined amount allocated for the FTE program category. These school-level instructional budgets are used for consumable materials, supplies, instructional software, and computing devices.

Social Circle City Schools has only one school per grade span and implements the Resource Allocation Management Plan (RAMP) for the equitable distribution of resources.

### **EXPENDITURES**

Funds are for allowable expenditures and are expended through the following process:

1. Schools, with the assistance of Program Directors/Coordinators develop budgets based on allotments (if available).
2. Allowable items are approved, or revisions are requested by the program director/coordinator.
3. After revisions have been made, the program director/coordinator approves school budgets and prepares set-aside budgets per guidelines.

4. The budget is uploaded into Consolidated Application.
5. After GaDOE approval, schools are notified to expend funds per submitted budgets.
6. Requisitions are made at the system and/or school-level.
7. Approval is obtained through the process described in requisitions section below.
8. An inventory list is kept at the school-level and contains the following elements: a description of the property, serial/identification number, source of funding (including the FAIN), who holds title, acquisition date/date of purchase, cost of property, percentage of federal participation if costs were shared, vendor name, school, equipment location, use/purpose, and current condition (Poor, Fair, Good, Excellent). The inventory is reviewed annually by the school-level administrator and by the program director/coordinator.
9. If purchasing books for Parent Resource Centers, book contents need to address areas in which parents may need assistance in supporting their child academically.
10. For purchases from district set-asides, the same process is followed but the program's purchasing secretary places the orders.
11. Once items are received, a signed copy of the packing list/invoice which has been verified as accurate is forwarded to the program director/coordinator as source documentation for audit/monitoring.

**Requisition Process:**

Federal programs purchasing follows, at minimum, all Social Circle City School System purchasing procedures.

Processing Schedule:

- Purchase orders received to SCCS Finance Dept. by the 2nd Thursday of the month will be processed by the 4th Thursday of the month
- Purchase orders received to SCCS Finance Dept. by the 4th Thursday of month will be processed by the 2nd Thursday of month.

1) The principal submits the requisition to the program director/coordinator, noting how the expenditure is addressing a section of the District Improvement Plan, School-wide Plan or CLIP components. Program Directors/Coordinators may also submit a requisition.

2) The program director/coordinator reviews the expenditure for allowability, reasonableness, necessity, allocability, adherence with period of performance, avoidance of conflict of interest, and compliance with cost principles and system procurement methods. After double-checking the account number with the approved school budget and the descriptions within the approved budget on the Consolidated Application, the program director/coordinator approves the requisition.

3) The requisition in the form of a purchase order is forwarded to the Federal Program Secretary/Finance Department for the obtaining of appropriate signatures.

4) The requisition is then sent to the CFO for signature.

5) The CFO forwards the requisition to the superintendent for the final signature.

6) If an expenditure is approved for school-level budgets, the program director/coordinator's secretary sends the requisition back to the school.

7) At this point, a purchase can be made by the school principal/assistant principal/bookkeeper (school-level expenditures) or the program director/coordinator's secretary (system-level set-asides).

8) All receipts are returned to the secretary for back-up documentation. Equipment and purchases with a shelf-life of longer than one year are logged on the school inventory forms as required under system inventory procedures.

The district does not make capital expenditures (object code 700) with most federal funds. If this should ever occur, approval via email must be obtained from the GaDOE.

Requisitions must include:

- Complete vendor information including phone number (and fax number if applicable)
- Ship to information including the address for the school
- Appropriate account number assigned by the system director/coordinator, principal or designee based on the budget sheets
- Sufficient detail to determine if each cost item is allocable, reasonable, and necessary.
- For micro-purchases of goods and services up to \$3,500 (individually or in aggregate) where there is no sole source vendor, the program director/coordinator has discretion to recommend the purchase without soliciting additional quotations or Internet searches;
- If a requisition is over \$3501, at least two written quotations solicited or at least two Internet searches for comparable products are to be conducted prior to approval of the purchase; (2 CFR §200.67, 48 CFR Subpart 2.1);
- For goods and services between \$3,501 and \$150,000 (individually or in aggregate) where there is no sole source vendor, at least two written quotations solicited or at least two Internet searches for comparable products conducted prior to approval of the purchase; 2 CFR §200.320
- Furthermore, in accordance with 2 CFR §200.88, 48 CFR Subpart 2.1, competitive proposals are required for goods and services (individually or in aggregate) in excess of \$150,000.
- No purchase or contract shall be divided into parts for the purpose of avoiding the above requirements.

Factors Affecting Allowability of Costs System staff must consider the following guiding questions when determining the allowability of a cost. In accordance with the federal cost principles, all costs budgeted and charged to a federal grant must be necessary, reasonable, allocable, and documented.

- Is the cost reasonable and necessary for the program?
- Do sound business practices support the expenditures?
- Does the expense support the purpose of the grant?
- Is the expense in compliance with laws, regulations, and grant terms?
- Is the price comparable to that of similar goods or services in the geographic area?
- Is the purchase supplemental in nature?
- Is the cost to be considered included in the plan?
- Does the system/school have the capacity to sustain what is purchased?

- Was competitive procurement used?
- If sole sourced, what is the reason?
- Is there enough time to implement the cost?

Federal funds cannot be used to purchase incentives for students, teachers, or to entice participation in professional learning activities. Food for parent involvement activities must be considered “light refreshments.” Light refreshments has been defined as donuts, fruit, muffins, juice, coffee, chips, pretzels, popcorn, raw vegetables and dip, nuts, cookies, brownies, punch, soda, and water. Light refreshments do not include pizza, sandwiches, or anything that could be considered any part of a meal. Federal funds can only be expended for those events that “build capacity.” This means schools/programs can fund a snack for a workshop teaching parents a specific skill, but cannot give snacks to parents volunteering.

## PROCUREMENT

To ensure open competition, the district uses the following procedures for procuring equipment, supplies, and contracted services (2 CFR §200.319(c) and 2 CFR§200.320(d)(3)):

- Sole source vendors are those individuals or companies that possess specialized knowledge, skills, or products for which there is no comparable measure. Included are contracted tutors and teacher mentors who have specific skills related to academic deficits or prioritized Title II-A needs identified through a school’s Comprehensive Needs Assessment or targeted within the School-wide Plan. Contracted tutors must hold or must have held valid Georgia teaching certificates in the content area or grade level for which the service is to be provided; be knowledgeable of best pedagogical practices in mathematics, English language arts, science, or social studies; possess the ability to manage the classroom environment; and be able to communicate effectively with school staff and parents. Teacher mentors must hold valid Georgia teaching certificates; must be recommended by the school principal to serve in role; and must be knowledgeable in coaching techniques to support new and struggling teachers.
- For micropurchases of goods and services up to \$3,500 (individually or in aggregate) where there is no sole source vendor, the program director/coordinator has discretion to recommend the purchase without soliciting additional quotations or Internet searches;[2 CFR §200.67 and §200.320(a), and 48 CFR Subpart 2.1]
- For small purchases goods and services [2 CFR §200.320(b)] between \$3,501 and \$150,000 (individually or in aggregate) where there is no sole source vendor, at least two written quotations solicited or at least two Internet searches for comparable products conducted prior to approval of the purchase;
- Simplified Acquisition Threshold (2 CFR §200.88, 48 CFR Subpart 2.1): Sealed Bids [§200.320(c)] are publicly solicited for items costing more than \$150,000. For goods and services in excess of \$150,000 (individually or in aggregate), in keeping the competitive sealed bid process outlined by system procedures will be used.
- Competitive Proposals [§200.320(d)]: Contract awarded to responsible vendor proposal who is most advantageous.
- Prior approval is needed for any individual item purchase over \$5,000.00

- Noncompetitive/Sole Source[§200.320(f)]: Only allow when the item is available from only one source.

**Method for Conducting Technical Evaluation of Proposals and Selecting Recipients (§200.320(d)(3))**

- All purchases shall be based upon acquisition of goods and services at the lowest cost while being best suited to meet the system’s needs.
- Vendors are placed on notice that lowest price alone will not be the sole determining criteria in the selection process.
- The SCCS reserves the right to award purchases on an individual item or combined item basis, whichever is in its best interest.

Quotations and or internet searches are required for purchases of more than \$3,500, and sealed bids are required for purchases of \$10,000 or more. The School District will follow the EDGAR requirements for collective expenditures totaling more than \$3500 from one vendor.

**Sole Source Vendors**

Noncompetitive Proposals [2 CFR 200.320(f)]

Procurement through solicitation of a proposal from only one source and may be used ONLY when one or more of the following circumstances apply:

1. The item is available only from a single source;
2. The public emergency for the requirement will not permit a delay resulting from competitive solicitation;
3. The Federal awarding agency or pass-through entity expressly authorizes noncompetitive proposals in response to written requests from non federal entity; or
4. After soliciting a number of sources, competition is determined inadequate.

Sole Sourcing Should Be Limited!

**Procedures for Sealed Bids/Competitive Proposals**

When spending federal funds, employees of the school district shall engage in comparative buying and obtain bids and quotes whenever appropriate. The Superintendent or his or her designee shall have the authority to issue regulations, invitations to bid, requests for proposals, or other procedures governing this process where there exists no specific state law or State Board rule which must be followed. In addition to price, the procedures established by the Superintendent may consider performance of the vendor with the School District, performance of the vendor with other customers, the convenience of the vendor to the District including whether the vendor is a local business, other benefits offered by the vendor or any other factor which may make the acceptance of a particular proposal from a particular vendor in the best interest of the School District.

At all times, the Superintendent shall follow any mandated processes required by state law, set forth in State Board of Education rules or procedures or regulations of the State Department of Education.

- An invitation to bid/Request for Proposal (RFP) will be placed on the system website and in the county's legal organ.
- The invitation to bid/Request for Proposal (RFP) will include a description (characteristics and specifications) of the goods or services to be provided, requirement the offeror must fulfill; factors to be used in evaluating the bid or proposal; date and time of the public bid openings.
- As bids are received by the designated system representative, they will be dated and stamped.
- At the appointed time, bids will be publicly unsealed and the results recorded by the designated system representative.
- The system representatives, including the CFO and Program Director, will evaluate all bids/Requests for Proposal (RFP) received by the designated due date. For sealed bids, the evaluation will consist of a price analysis comparing the values of similar products, goods, and services to determine the reasonableness of the bids. For competitive proposals, all submissions will be evaluated using a rubric provided to vendors as part of the RFP package.
- After a price analysis, the Program Director will submit to the Superintendent for Board of Education approval the recommended bid/proposal.
- Following board approval, a letter summarizing the results will be sent to all offerors.
- A firm fixed price contract award will be made in writing to the lowest responsive and responsible bidder.
- The system's vendor contracts for federal funds will contain the applicable provisions described in Appendix II to Part 200—Contract Provisions for non-Federal Entity Contracts Under Federal Awards.
- Vendors who wish to protest the results of the process must do so in writing using the procedures outlined in the bid or RFP package.
- These procedures do not apply to short-term contracted services such as professional consultants, retirees, or current employees or to situations in which a sole source vendor is the most viable option.
- No purchase or contract shall be divided into parts for the purpose of avoiding the competitive bid process.

The Board of Education may reject any or all bids. The Board may in its judgment consider such factors as service, location, and timeliness of delivery; therefore, they may accept the bid that appears to be in the best interest of the school system even if it is not the lowest bid. The Board reserves the right to waive any formalities in or reject any or all bids or any part of any bid. Any bid may be withdrawn prior to the scheduled time for the opening of bids. Contracts binding the school district can be made only by the Board or the Superintendent or approved agent

### **CONSULTANTS, CONTRACTS, PURCHASED SERVICES FOR FEDERAL FUNDS**

Contracts are required for all consultants and purchased services. Agreements are entered into between the Social Circle City School System and the consultant or contracted vendor. Each contract contains the following:

- Contracts are generated by the program director/coordinator. They also must be signed by the CFO and superintendent.
- Specific duties are specifically spelled out for each contract. The contract includes the description of the service, the time contracted for service, the rate of pay agreed to.
- The person must also submit to a criminal background check and sign the mandatory child abuse reporting acknowledgment if he/she is working with students. A copy of the vendor's driver's license or other photo ID must be provided with the initial contract.
- If the contract is with a TRS retiree the individual must be approved yearly through E-Verify prior to beginning services.
- If a contracted vendor is serving as a tutor, principals must submit the time logs based on the payroll deadlines established by the Finance Department. Each contract is signed by the following: contractor, superintendent, and program director/coordinator.

**Contract Administration [2 CFR200.318(b)]:** The program director/coordinator will maintain oversight of contracted vendors. Source documentation such as time sheets, sign-in sheets, agendas, invoices, or evidence of satisfactory completion of the terms of the contract must be verified and signed by the program director/coordinator prior to the payment for goods or services. Artifacts, daily sign in sheets, and completion records of all workshops are kept on file in the central office. The program director/coordinator signs off on all invoices/contracts prior to the issuance of payment for services by the Business Office. These contracts and invoices must be maintained and kept in the central office files.

**Conflicts of Interest:[2 CFR 200.318(c)]** Employees of the SCCS who are engaged in the selection, award and administration of contracts shall abide by the following:

- No employee, officer, or agent may participate in the selection, award, or administration of a contract supported by a federal award if he or she has a real or apparent conflict of interest (2 CFR §200.112, 2 CFR §200.318(c)(1)).
- Such a conflict of interest would arise when the employee, officer, or agent, any member of his or her immediate family, his or her partner, or an organization which employs or is about to employ any of the parties indicated herein, has a financial or other interest in or a tangible personal benefit from a firm considered for a contract.
- Officers, employees, and agents of SCCS may neither solicit nor accept gratuities, favors, or anything of monetary value from contractors or parties to sub-contracts.

Violation of these standards will result in reporting of said personnel to the superintendent of schools and, if appropriate, local authorities. Any misconduct could result in suspension, loss of employment, and any other consequences that are applicable by law. All violations of federal criminal law involving fraud, bribery, or gratuity violations potentially affecting the federal award will be reported to the system superintendent of schools as well as the Georgia Department of Education (GaDOE) (2 CFR §200.113).

The district requires vendors to disclose potential conflicts of interest with current or former Social Circle City Schools Board of Education members and employees when signing contracts (2 CFR §200.318(c)). Additionally, the district reviews the System for Award Management (SAM) list of suspended, debarred, and excluded vendors as part of the internal controls process.

Suspension & Debarment Procedures [2 CFR 180.220]: For procurement contracts/expenditures that include transactions expected to equal or exceed \$25,000, the program director/coordinator will check the federal System for Award Management (SAM) for suspension, debarment and exclusion of the vendor (2 CFR 180.220). Evidence of the verification can be in the form of a date/time stamped print screen or other digital method that is readily available or in the form of Suspension and Debarment Form signed by the individual performing the check. Documentation should include who checked, when it was checked and the query/web link criteria. A copy of the completed form or date/time stamped print screen is to be maintained in the program files.

Superintendent's Attestation: If required by GaDOE or law, annually, on the final fiscal report or voucher requesting payment, the superintendent will submit the certification attesting that cash receipts, expenditures, and disbursements are in compliance with the Elementary and Secondary Education Act (2 CFR §200.415)

### **PERSONNEL COMPENSATION AND LEAVE**

Federal funds expended on personnel can be monitored separately through payroll. Periodic certifications, collected twice yearly (January and May) and are signed by supervisors for those staff members who are paid 100% with federal funds, document allowable duties. Split-funded personnel submit time logs that document the amount of time spent in federal and non-federal duties. Other expenses are documented through purchase orders, which have been approved through the requisition process, and through travel authorizations, which are submitted on system Travel and Leave Requests and Travel Expense Reports, with automatic calculations and information available for reimbursements on mileage and meals.

### **PAYROLL**

The CFO is informed by the federal program director of the names of personnel paid with federal funds. After the September payroll has been posted, the Director of Federal Programs reviews a report generated that shows the name of the personnel paid with federal funds. This report should match the federally paid personnel names submitted on school budget sheets. If the names do not match, an investigation occurs and the matter is resolved, if necessary, through journal entries. The payroll report is generated and checked throughout the year. The payroll report is pulled and checked several times throughout the year as part of the drawdown process. At the beginning of the year, federally funded teachers are asked if they will complete a degree upgrade during the year. Budgets are built around the anticipated upgrade.

### **TIME AND EFFORT**

#### ***After-The-Fact Periodic Certifications:***

Federal law requires all employees, including teachers, paraprofessionals and other staff, who are paid with federal funds to document the time and effort spent within the program. Fully-funded federal personnel must submit after-the-fact assurances (Periodic Certification Form) documenting that they spent 100% of their time on allowable federal program-related activities (2 CFR §200.430(i)(1)(i,vii)). The program director/coordinator provides to each school a list of federal program employees and after-the-fact periodic certifications to complete with these

employees. The LEA enters the dates and names on each form and instructs the school to obtain the signatures of the employee and the school administrator. After-the-fact periodic certifications will be submitted after the conclusion of each semester and maintained at the central office.

**Permanent Schedules:**

A permanent schedule is required to be submitted along with periodic certifications of teachers or paraprofessionals who are being paid wholly with federal funds. Title I teacher schedules and paraprofessional schedules (showing paraprofessionals under the direct supervision of a teacher who meets professional qualifications) are signed and dated monthly by the employee and supervisor documenting allowable duties and submitted to the program director/coordinator.

**Time Sheets:**

A time sheet is completed by individuals providing additional or supplemental services. The sheet is approved and signed by the principal as well as the program director/coordinator, who forwards it for approval to the CFO for payment.

**Split-Funded Time Logs:**

Individuals who are paid less than 100% from federal funds or whose schedules change from day to day complete submit monthly time logs depicting the amount of time spent on federal duties matched, at minimum, the portion of their salary funded through the federal program. Monthly time logs are collected from split-funded personnel and maintained on file at the central office (2 CFR §200.430(i)(1-8)). The logs identify the time and duties funded by all fund sources, are reconciled each semester (2 CFR §200.430(i)(1)(viii)(B,C) (B)), and are signed and dated monthly. These personnel are instructed to monitor their own time throughout the month and the program director/coordinator approves the monthly time log via a signature and date after the fact (2 CFR §200.430(i)(1)(i,vii)).

**Personnel Activity Reports:**

A professional leave form is reviewed and recorded for those attending allowable professional learning activities funded by federal dollars. These leave forms are signed by the school principal verifying the activity, date of the absence(s), and name of the employee and are then signed off by the federal program coordinator who cross-references them prior to signing the drawdown report.

**Compensation Policy**

The Social Circle City School System follows the Social Circle City Board of Education Policy for compensation.

**Leave Policy**

The Social Circle City School System follows the Social Circle City Board of Education Policy for leave.

**TRAVEL [2 CFR 200.474(b)]**

**GUIDELINES (updated 1/1/18)**

- 1) Travel must be by the most direct route possible.

- 2) Only approved travel will be reimbursed to employees representing Social Circle City Schools.
- 3) The Director and/or the Supervisor must sign before submitting to the Superintendent for final approval and payment. Travel forms should be submitted, ideally within 10 days, but no later than 45 calendar days after completion of the trip or event. Expenses submitted in excess of 60 calendar days will not be reimbursed.
- 4) Normal commuting miles, from residence to primary work station, must be deducted when calculating total mileage reimbursement. Exception: Travel occurring on weekend or holiday outside of the normal work schedule.
- 5) One day trips:
  - a. Noon meals will not be reimbursed unless this meal is part of a required registration fee.
  - b. Employees who are more than 50 miles away from home or headquarters on a work assignment and are away for more than 12 hours may be reimbursed for meals according to the per diem rate, even when there is no overnight lodging. In this situation, employees are entitled to reimbursement for the noon meal. In addition to the noon meal, employees who depart prior to 5:30 am are entitled to reimbursement for breakfast expenses, and employees who return later than 7:30 pm are entitled to reimbursement for dinner expenses.
- 6) Overnight Travel:
  - a. Employees traveling on school business are allowed lodging expenses when their destination is located more than 50 miles from both their Primary Work Site and Residence.
  - b. Travelers should select the least expensive option available taking into consideration proximity to the business destination and personal safety. The traveler must inquire about the government rate availability, or the conference lodging rate, and select the lowest available rate.
  - c. Employees traveling overnight are generally eligible for per diem amounts designed to cover the cost of three (3) meals per day for all days on travel status, less any provided meals.
- 7) The meal reimbursement is \$28.00 per day for three meals. The single meal reimbursement is stated below:
  - a. Breakfast - \$6.00
  - b. Lunch - \$7.00
  - c. Dinner - \$15.00Copies of all receipts are required.
- 8) The meal rate for the high cost areas is \$36.00 per day. The single meal reimbursement will be as follows:
  - a. Breakfast - \$7.00
  - b. Lunch - \$9.00
  - c. Dinner - \$20.00The high cost areas are limited to metro Atlanta (Counties of Fulton, DeKalb, Cobb), Augusta (Richmond County), Brunswick (Glynn County) and Savannah (Chatham County). Copies of all receipts are required.

9) The current mileage rate is subject to change annually as announced by Georgia Department of Education. Regardless of stated mileage rate, employee will be reimbursed the current state approved mileage rate.

#### **STIPENDS GaDOE Rule 160-3-3-04**

Stipends for allowable, reasonable and necessary off-contract work hours to certified and classified staff are paid through payroll adhering to all federal labor laws. The federal program director determines the amount paid for certified staff. Documentation in the form of sign-in sheets, logs and or principal attestations are required with the payment request. All requests for payment are due in a timely manner.

#### **SUPPORTING SOURCE DOCUMENTATION**

Appropriate source documentation for time and effort, travel, equipment, and other purchases is maintained at the central office. Included are the following:

- Time and Effort Samples include: Fixed schedules, Monthly Attestations, Personnel Activity Reports, sign-in sheets, logs, agendas, Semi-Annual Periodic Certifications, split-funded time logs, memorandum for approval of payment for stipends/supplements
- General Ledger, Month end reports, and Requisitions
- Travel: Travel and Leave Requests, conference agendas, receipts, Travel Expenditure Reports
- Equipment: Requests, Purchase Orders, invoices, packing slips, receipts
- Contracted Services: Service contracts, time sheets, requests for payment, sign-in sheets from trainings, agendas from trainings
- Software: Requisitions, Requests for Pre-Approval of Federal Purchases, invoices/receipts

Purchases made with federal funds must fall within the grant period of performance. If costs are shared with another federal or state program, the expenditure total must be prorated according to the percentage of use by each program. Likewise, purchases that encompass multiple periods of performance must be prorated accordingly, as are leases and subscriptions that begin before or end after a grant's defined period of performance. Such proration must be clearly labeled on the invoice or Request for Pre-Approval of Federal Purchases.

#### **Invoices**

The following procedures will be used for Invoices:

- The school bookkeeper or the federal program secretary will match the order as he or she receives it with the purchase order. The purchase order cannot be paid unless the invoice matches.
- Receipt of Invoice: Invoice is received by system secretary/federal program secretary and forwarded to Accounts Payable.
- Accounts payable compares vendor invoices to purchase orders. If these items match, the invoice is entered as an account payable. If not, the Accounts Payable Clerk Specialist alerts the appropriate program/school bookkeeper or the appropriate program coordinator who work together to determine a solution.

Payment of Invoice:

The following procedures will be used for payment of invoices:

- The Business Office charges the expenditures to the proper fund/program designated on the purchase order by the program/school bookkeeper or coordinator in the system financial software.
- If invoices received that are charged to a federal program exceed the amount of purchase orders, the Business Office alerts the appropriate program/school bookkeeper who works together with the coordinator and determines a solution.
- Disbursement is not made until the invoice is validated as owned by the system and received by the location/bookkeeper.
- Open purchase order reports are followed up by the Business Office to the federal programs secretary/coordinator monthly and upon request to determine if goods or services have in fact been received but not invoiced by the vendor. Contact is made with the vendor to secure an invoice if such instances are noted.

**PROCUREMENT PROCEDURES to SAFEGUARD ASSETS and/or AVOID FRAUD and ERROR [§200.318(a)]**

Internal controls to segregate duties associated with cash management, reconciliation, and reimbursement are as follows:

**Risk Assessment**

The CFO, having received both formal and informal training, is familiar with the monetary guidelines of cash management. Majority of the programs operate on a reimbursement basis, and the accounts payable specialist is aware of the GaDOE guidelines and the Treasury Regulations at 31 CFR part 205, which implements the cash management Improvement Act of 1990 (CMIS), requires the state recipients to enter into an agreement which prescribes specific methods of drawing down federal funds for selected large programs.

The Directors of Federal Programs, having received both formal and informal training, are familiar with the monetary guidelines of cash management, allowable costs for federal programs, and compliance requirements of federal programs. The Directors of Federal Programs attends training provided by GaDOE to stay knowledgeable with regard to requirements for federal programs.

Each year, a risk assessment is performed by the GA Department of Audits to determine areas of financial and compliance risk to the School District. This assessment is also used to determine the District's level of acceptable risk and to determine where to focus efforts to close significant risks to the District financially, including federal resources.

## **EQUIPMENT 5.2 (2 CFR 200.313(d))**

**Property purchased with federal funds is to be used only for the purposes outlined in the grant.**

### **Requisition of Equipment**

All purchases with (federal funds) will be made only after proper approval (signed-off on) by the Federal Programs Director(s). Purchases must be allowable, supplemental, and consistent with academic assessment needs. Costs should be reasonable and necessary for operating federal programs. Federal funds are not to be used for general expenses required to carry out other responsibilities of a state or its sub recipients. Regardless of cost, items will be included on the inventory if they have a shelf life of more than one year. Books and consumable items are not included on the inventory.

### **Reconciliation of Physical Inventory**

Equipment purchased with federal funds is maintained on a spreadsheet that identifies the item, inventory/tag number, Federal Award Identification Number (FAIN), purchase order number, vendor, date of purchase, cost, location, and condition. There are no vendor contracts maintained.

### **Inventory**

An inventory of tangible personal property having a useful life of more than one year will be maintained at the system and/or school level. This includes all items purchased under state object codes 615 (expendable equipment) and 616 (expendable computer equipment). Inventories will be maintained on a spreadsheet that at minimum includes the following: description, serial/identification number, vendor, date of purchase, cost, location, and condition. Equipment purchased with federal funds is permanently marked with the program name (e.g., "Title I-A") and the fiscal year in which the equipment was purchased.

Inventory of all equipment and property belonging to any federal program will be identified and inventoried annually. The appropriate federal program coordinator will check equipment each spring. It is also recommended that a building-level administrator or designee verify an inventory of items purchased with federal funds each fall.

An electronic inventory database is maintained at the school-level by the designee selected by the principal. The database that is updated by the school principal or designee each time new equipment is purchased. All federally purchased property must be aligned with the program purpose (2 CFR §200.453(a)) and is identified by permanent markings on the equipment that signify the program name and the fiscal year the equipment was purchased. The database includes the item name, a description of the property, serial/identification number, source of funding (including the FAIN), who holds title, acquisition date/date of purchase, cost of property, percentage of federal participation if costs were shared, vendor name, school, equipment location, use/purpose, current condition, and disposition of equipment (2 CFR §200.313(d)).

School personnel must annually verify the location and condition of the equipment, and the physical inventory must be signed and dated by the person conducting the inventory. Each item

must be checked/noted on the inventory record specifically for condition and location. Technology personnel help determine the condition of electronic equipment.

When a piece of equipment purchased with federal funds needs to be disposed of, disposal forms are completed by the school and sent to the federal programs office where they are kept on file. Disposal occurs according to the Social Circle City School System disposal procedures.

Any equipment, materials and/or supplies purchased with federal funds are considered solely for the use of that program. It is suggested that pilferable items such as electronic equipment (iPads, tablets, Chromebooks, laptops) are stored in locking sync and charge carts when not in use. The school principal is responsible for training staff on the intended use of federally purchased property and for ensuring usage is aligned with the program's purpose and the School-wide Plan.

The LEA Disposition Policy, along with applicable state and federal laws, will be followed for the disposition of equipment and real property purchased with Title I, Part A and other federal funds (2 CFR §200.313(d)). Inventories reflect the reason for disposition, disposal date, and sale price (if applicable). A strikethrough on the inventory indicates disposal of the item. In keeping with 2 CFR §200.313(e), property purchased with federal funds is first offered to another federal program if no longer needed for the original program's purposes. Electronic and hard copies of the inventories are filed annually with the director(s) of federal programs.

#### **Maintenance and Repair of Equipment**

Each school is responsible for contacting the technology department for maintenance and repair of broken items. Schools are responsible for the tracking and monitoring of equipment that is out for repair.

#### **Equipment Disposition Procedure (§200.313(c)(1)(2)):**

In accordance with OCGA: 20-2-520 the Board has the power to sell, dispose of, or donate surplus property. Before any sale is made, however, the Board shall adopt a resolution declaring that the property is no longer necessary or convenient for school purposes and specifying the term and manner of the sale. The Board reserves the right to reject all bids and shall authorize the Superintendent or designee to conduct the sale.

The Superintendent shall establish procedures for the sale, disposal, or donation of unserviceable or surplus property and other items (except real estate and items purchased with Federal Funds) which is in the best interest of the school system. Such procedures shall provide for the sale, disposal, or donation of these items in the manner most advantageous to the school system, and shall conform to the rules and regulations of the State governing such matters.

Items purchased with Federal Funds must be disposed of according to the procedures set forth by the Georgia Department of Education for that funding source.

The following guidelines must be followed:

- Once a piece of equipment that was purchased with Title funds is no longer being used for its originally intended purpose, it can be designated as surplus. Once designated as

surplus, the item can be used for a different purpose outside of Title guidelines. School-based representatives must request approval from both the principal and the appropriate Title coordinator before items are designated as surplus so that a consensus is reached that the original purpose or intent has been met. An email is sufficient to achieve this.

- Items that are no longer usable need to be disposed of.
- A disposition form must be completed for any item that is declared surplus because it has met its originally intended purpose or because it is no longer usable. Disposition forms will be provided or located in your school's Google Title Programs Inventory folder.
- The date of disposition must be entered on the inventory sheet.
- Once a disposition form has been completed and the disposition date has been entered onto the inventory form, the item can be repurposed or disposed of. However, the item must remain on the inventory sheet for five years from the date of disposition before it can be removed from the inventory spreadsheet.

The school system does not lease equipment using Title funds. The school system does not have any targeted assistance schools.

When computer equipment is no longer operational, it will be recycled or disposed. A system Disposition Form must be completed and approved by the appropriate federal program coordinator prior to the disposal of any equipment. Inventory records will need to be corrected and maintained in the school's individual Inventory records. The Technology Department works with schools to dispose of and recycle all equipment following these procedures.

### **Monitoring of Equipment**

All equipment purchased is monitored by the appropriate system-level federal program coordinator and school level administration or their designee. All equipment purchased by schools is inventoried on a spreadsheet. For every new equipment item, a label with an ID number is attached to it and documented on the inventory sheet.

School-level Fall Physical Inventory: The principal or designee will complete a physical inventory check at each facility in the fall.

System-level Spring Physical Inventory: The appropriate federal program coordinator of each funding source or designee will complete a physical inventory check at each facility in the spring.

Current fiscal year purchase orders may be pulled from object codes 615, 616 to check not only if each item is in the inventory but is in the location that assigned, and being used for the intended purpose. The appropriate federal program director/coordinator of each funding source will communicate with each principal and school level inventory contact the results of the inventory monitoring check.

### **Missing Equipment Protocol and Adequate Safeguards to Prevent Loss, Damage, or Theft**

If it has been determined that an item purchased with federal money is missing, the following steps are to be taken:

- Report the missing item to the media specialist, who maintains school inventory, and the principal
- Report the missing item to the appropriate contact at the central office who will inform the appropriate central office personnel.
- If it has been determined that an item was stolen as a result of a break in, please file a report with the SR. Then send a copy of the report to the appropriate central office personnel.
- Attach the incident report to a Disposal Form and attach to the Inventory records. Submit a copy to the federal program director/coordinator.
- Make corrections to the inventory on the spreadsheet.
- Send an email to the appropriate federal program coordinator that the inventory has been updated.

\*\*Please note that schools may be required to replace the missing item from another funding source.

### **TRANSFERABILITY**

While LEAs are provided the opportunity to transfer funds under the Every Student Succeeds Act, the Social Circle City School Systems has chosen not to transfer federal funds.

### **CASH MANAGEMENT/PERIODIC DRAWDOWNS OF FUNDS**

#### **(2 CFR 200.313 (b) (6)) 5.3**

*Title I, Title IIA, Title IVA Flowthrough, Special ED Preschool, Perkins Program Improvement*

#### **SEGREGATION OF DUTIES:**

Duties are segregated within the fiscal management of the school system. As part of this segregation of duties, multiple signatures are required to process any requests for payment or purchase requisitions. Requisitions are initiated at the school or departmental level, approved by the program director/coordinator, and forwarded to the Superintendent for signature. The requisition/purchase order is then forwarded to the Business Department for a check of the account numbers and approval of the CFO.

Contracted vendors are paid through the accounts payable specialist after an invoice or time sheet has been approved by the program director/coordinator, a completed Request for Payment/Invoice signed by the vendor has been processed, and a pre-approved contract signed by the program director/coordinator, CFO, and superintendent is submitted (2 CFR §200.303(a)).

Payroll entries, stipends, and additional salary from service contracts are processed by the payroll manager based on personnel activity reports, memoranda, and time sheets approved by the program director/coordinator and verified by the employee's immediate supervisor. As with state and local funds, federal stipends are paid in accordance with the district's established procedures with regard to number of Professional Learning Units earned or any contracted work.

which is beyond the contract day or year (State Board Rule 160-3- 3-04 and LEA Board Policy GAD). Supplements are in accordance with agreed-upon calculations.

### **PROGRAM ACCOUNTING AND RECONCILIATION**

Program expenditures are monitored monthly.

Payroll and draw down reports are scrutinized, with time and effort and purchasing documentation checked against expenditures recorded in the electronic accounting system (GAORS). If discrepancies are discovered, the program director/coordinator investigates and resolves the issue with the CFO. At the conclusion of the sub-grant's period of performance, the CFO prepares and the program director/coordinator reviews the Program Completion Report for submission to the GaDOE (2 CFR §200.302(b)(5)).

Time and effort reports are signed by the principal as the employee's supervisor and then forwarded to the program director/coordinator for approval and maintenance.

### **DRAWDOWNS**

The CFO prepares the requisition of funds. The amount of the requisition is calculated by the Federal Programs Manager using the report of monthly expenditures as all requisitions are only done in arrears for purchases already made prior to the request. The claim is processed through GAORS or other specified invoice applications within the GaDOE Portal.

A monthly budget detail report is printed for each federal program. Drawdown amounts are calculated. The Budget Detail Report is submitted along with the monthly cover sheet to the Federal Program Coordinator/Director for approval. No drawdowns are performed without the signature. The CFO administers the drawdowns through the GaDOE portal/Financial Applications/GAORS/DE0147 at the intervals acceptable to the financial auditors. The CFO signs the coversheet.

Drawdowns are based on actual expenditures for the month. Actual expenditures are paid with the school system general fund prior to drawdown.

There is no cash involved as all drawdowns are directly deposited via ACH.

The CFO reconciles the bank statements.

The Business Department performs periodic review of the general ledger.

All reporting documentation is kept in the Business Department. It can be reviewed at any time.

**General Draw-down Schedule**

<b>Month of Expenditure</b>	<b>Month of Drawdown</b>
July	September/Budget Approval Required
August	September/Budget Approval Required
September	October
October	November
November	December
December	January
January	February
February	March
March	April
April	May
May	June
June	Deadline set by GaDOE for proper Fiscal Year receipt

Drawdowns will not be performed prior to obtaining the director of federal grant approval. Due to this procedure, federal funds deposited in the school system bank account may be delayed to the system. The Finance Department is requesting quick turnaround of signatures to assist in timely request of funds from GaDOE.

Federal grant end dates are September 30. Annual Completion Reports will be submitted to the director of Federal Grant for review and signature prior to closing the grant for the fiscal year. The completion report is due no later than October 3.

Approved purchase order procedures are followed for federal grant expenditures.

**GRANT APPLICATION PROCESS**

**Grant Request Procedures**

In some instances, a program or project calls for only one payment, most however require monthly requests that are submitted to GaDOE to obtain payments. These funds are usually requested by the 30th of each month with funds received by the 15<sup>th</sup> of the following month. The

amount of the request is usually set by the funds expended on a monthly basis. The expenditures include payroll, payroll taxes, supplies, travel, etc. Funds are received electronically at the bank. When notification is received from GaDOE we receive and post these to the individual grants.

Upon completion and approval of the Consolidated Application budget, the CFO enters the budget into the financial accounting system which is monitored at the GaDOE department of finance and accounting. If applicable, schools are provided a copy of the budgets that are entered into each school's facility code. Since almost all federal funds are spent on teachers' salaries, Parent Engagement funding is typically the only budgetary item that the Principals manage from Title I funds. However, in cases of additional funds being available, the Federal Program Director(s) will provide technical assistance in expending and monitoring funds.

The monthly budget detail report is printed for each federal program. Drawdown amounts are calculated. The Budget Detail Report is submitted along with the monthly cover sheet to the Federal Program Coordinator/Director for approval. No drawdowns are performed without the signature. The CFO administers the drawdowns through the GaDOE portal/Financial Applications/GAORS/DE0147 at the intervals acceptable to the financial auditors. The CFO signs the cover sheet.

## **SECTION 6 PROGRAMMATIC REQUIREMENTS**

### **WITHIN DISTRICT ALLOCATION PROCEDURES**

#### **SUPPLEMENT VS SUPPLANT**

Federal funds are only used to supplement and, to the extent practicable, increase the level of funds that would, in the absence of federal funds, be made available from non-federal sources for the education of students participating in programs. Federal funds are not used to take the place (supplant) of local, state, or other federal funding and are not provided to participating children when the same services are provided to non-participating children with non-federal funds.

Conversations regarding supplement vs. supplant are held quite often throughout the year.

In general, federal programs (such as Title II, Title IV) that apply the supplement versus supplant rule at the expenditure level follow these guidelines:

- The programs/activities provide supplemental services to programs that are required by federal, state, and local law.
- Federal funds do not support programs that were paid with state or local funds unless there has been evidence of precipitous decline.
- Federal funds are not supporting any programs that are being supported in other schools with state or local funds.

Schools, both Title I and non-Title I, are allocated local and state-funded resources in the form of personnel and instructional material budgets. Furthermore, state and local funds are used to fund professional learning activities, field trips, and textbooks for system and school initiatives as well as to maintain facilities and technology systems.

### **GENERAL LEA SELECTION AND ALLOCATION PROCEDURES**

#### ***Procedures for Determining Rank Order Allocations***

#### ***Attendance Area Determinations/Eligible Attendance Area Rankings***

The Eligible Attendance Area Spreadsheet is compiled utilizing data from the previous October's FTE free/reduced priced meal status as well as the following:

- Identifying eligible school attendance areas and ranking them by percentage of low-income children.
- Determining the ranking of each area.
- Determining the allocation for each area.

SCCS serves Title I schools in rank order of the percentage of poverty within the school as calculated on the Eligible Attendance Area Worksheet. SCCS utilizes grade span grouping. Schools are ranked in order from highest to lowest percentage poverty in an elementary grade span (PK-2 and 3-5). The single middle school grade span (6-8) and the single high school are not Title I schools.

### **Eligible Attendance Areas:**

The Georgia Department of Education (GaDOE) Eligible Attendance Area Worksheet is used to calculate the previous year's enrollment (from the October FTE count), pre-kindergarten information, and free or reduced priced meal status. The school nutrition director and FTE coordinator provide reports to the Title I director to ensure the accuracy of data pre-populated in the Eligible Attendance Area Worksheet within the Consolidated Application. For each school, the pre-kindergarten enrollment is automatically subtracted from the enrollment; likewise, the number of pre-kindergarten students qualifying for free/reduced priced meals is subtracted from the school's overall count of students eligible for free/reduced priced meals. The percentage of poverty automatically calculates via input of the required data through the following formula:

### ***School Poverty Percentage =***

$$100 * \frac{\text{Previous October's Total FRM Count Students} \textit{ Minus} \textit{ Pre-K FRM Count}}{\text{(Total FTE Enrollment from Previous October)}}$$

Schools are grade span grouped and rank ordered by poverty percentage, with the school with the highest poverty percentage ranked first and the school with the lowest poverty percentage ranked last in each grade span. Using the rank ordering, per pupil allocations in each grade span are calculated highest to lowest based upon the percentage of poverty or in a rank such that a school ranked at a higher poverty receives no less per pupil allocation than the lower ranked per pupil allocation. School-wide schools, those currently at 45% or greater poverty, or that have been a school-wide program and remain above the 35% poverty rate, are served. Currently, no schools are being served as targeted assisted programs. The Social Circle City School System does not use the Community Eligibility Provision (CEP).

Effective with the FY18 school year, equitable distribution of anticipated state and local resources to all schools as outlined is documented in the Resource Allocation Methodology Plan (RAMP). The RAMP is developed in concert by the central office administrators, submitted as an attachment to the Consolidated Application, reviewed by the Georgia Department of Education (GaDOE) staff, and approved. The RAMP includes calculations regarding the following considerations: grade-span specific student-teacher ratios; support and administrative staffing requirements; as well as instructional supplies, technology, and equipment allotments based upon per-pupil amounts. Implementation of the RAMP ensures that Title I funds are supplemental and, when distributed using the rank order, allocated appropriately.

### **Rank Order Within Schoolwide Programs**

Occasionally, schools participating in the SWP may choose to provide more intensive services to a smaller population of students either by academic need or subject area. In these circumstances, the school must then determine from the pool of eligible students which children will actually participate in the additional Title I program based on a determination of which children have the greatest need of special academic assistance and in which subject areas, based on the rank-order lists. The school has significant discretion in the factors that may be considered. However, the school must identify and rank order the students based upon multiple, educationally related, and objective criteria. For example, the school could concentrate resources on certain grades or in

certain academic subjects, or it may decide that homeless or limited English-proficient students have greater needs than other eligible students. A rank-order list prioritizing students to be served must be up-to-date and on-file in the Title I office. An Excel spreadsheet can assist in this rank order process.

It is recommended that school staff, in consultation with the Title I Program Director, review all the data available about the performance of eligible children, and then use their best professional judgment in making choices about any supplemental programs. The school must focus the additional services on children who are failing, or most at risk of failing, to meet State academic standards.

The following are guidance in the development and implementation of supplemental services (such as an extended school year, before- and after-school programs, summer programs).

1. Description of instructional strategies and programs that coordinate with and support the regular program.
  - Grades and subject areas to be served.
  - Instructional strategies to be used.
  - Scheduling models to be used.
  - Supplemental instructional activities.
2. Description of the method by which children with the greatest need are selected.
  - Pre-K–2 multiple selection criteria.
  - 3–12 multiple selection criteria.
  - Copy of multiple, educationally related, objective criteria worksheet for each subject and grade level of students being served.
3. Description of provisions made to serve all eligible children, including economically disadvantaged, disabled, migratory, LEP, and homeless children.
4. Description of provisions for instruction by highly qualified staff and a description of strategies used to provide professional development opportunities to teachers and other individuals as appropriate.
5. Process for reviewing the progress made by participating children on an ongoing basis and the process for evaluating and revising the program as needed to provide additional assistance to enable these children to meet the state content standards and state student performance standards.
6. Documentation of time logs and/or sign in sheets for students as well as teachers.
7. Notification to parents of students eligible for additional service.
8. Description of time, number of participants (teacher/student ratio), and pay rate.
9. Documentation of program effectiveness.

### **Equitable Services for Private School Participation**

**Private schools in the Social Circle City School System eligible attendance area have declined to participate in federal activities.** Students attending a private school would be subject to the same PPA provisioning as current Social Circle City Schools students that are allocated according to attendance areas. The private school worksheet would be completed and attached to the Consolidated Application to ensure that all reservations related to parental involvement, instructional lead teachers, professional learning, and paraprofessionals have been

reserved. The district uses the information provided by the GaDOE to determine reservations for parental involvement, FLP, Private Schools, indirect cost, and Neglected and Delinquent. Private and homeschooled students remain eligible for identification under Child Find for services through IDEA.

### **ALLOCATIONS AND CARRYOVER**

After receiving notification of the grant amounts from GaDOE, reservations in each budget are set aside for program-specific required components such as parent and family engagement, professional learning, neglected and delinquent, private school per pupil and equitable services, and homeless students. Administrative costs are also part of the LEA reservations, which are not included in the schools' per pupil amounts.

### **WRITTEN PROCEDURES TO IDENTIFY TITLE I-ELIGIBLE STUDENTS**

There are no targeted assistance programs in the district. The SCCS operates Title I School-wide Programs at two of four campuses (Social Circle Primary and Social Circle Elementary Schools). As such, all students on these campuses are eligible to participate in the Title I, Part A school-wide program. Per pupil amounts are allocated to schools in rank order of poverty based on the number of children from low-income families who reside in eligible attendance areas (children eligible for free/reduced priced meals under the Richard B. Russell National School Lunch Act). Low income is determined by the number of free or reduced priced meals at a school using the previous year's October FTE count. Higher ranking schools receive the same per pupil allocation or more than the schools ranked below those schools. The per pupil allocation is always large enough to provide a reasonable assurance that each school can operate its Title I program of sufficient quality.

At the conclusion of the grant's award period and no later than October 30, a Completion Report (2 CFR §200.302(b)(2); 2 CFR §200.327; 2 CFR §200.328) is submitted to the GaDOE. Up to 15% of the initial allocation in unobligated funds may be carried over to the next fiscal year and used in accordance with program guidelines as detailed below. Typically, carryover funds are allocated in one of two ways:

- (1) to schools by increasing the per pupil amount while maintaining rank order, basing that amount on the total number of children from low-income families in each area or
- (2) the funds are allocated back to all the schools on an equal basis to give each school an opportunity to spend the funds.

Either way, schools must submit a written description of the expenditure requests. To determine remaining Parent and Family Engagement, Flexible Learning Program, and private school funds, the Title I director would consult with the accountant, who generates an Expenditure Detail Report, and then uses the Carryover Worksheet in the Consolidated Application to report the carryover (if applicable).

Set-asides are re-calculated for per pupil amounts. Equitable services are also re-calculated depending on an allocation of funds for district-level activities.

Monthly budget sheets are monitored regularly throughout the year and calculations are made from these near the end of the school year to determine that no more than 15% will be carried into the following year. Should carryover occur in private school set-asides, those amounts will be added to the following year's private school set-aside funds.

### **AMENDMENTS**

Budget amendments are submitted by the Federal Program Directors/Coordinators for any changes in the original approved budget.

### **CARRYOVER**

Typically, carryover funds are allocated in one of two ways: (1) to schools by increasing the per pupil amount maintaining rank order, basing that amount on the total number of children from direct certified students in each area or (2) the funds are allocated back to all the schools on an equal basis and each school is given an opportunity to spend the funds. Set asides are recalculated when carryover is included.

Monthly budget sheets are monitored regularly throughout the year and calculations are made from these near the end of the school year to determine that no more than 15% will be carried into the following year. Should carryover occur in Parental Engagement, those amounts will be added to the following year's Parental Involvement set aside funds.

### **RESERVATION OF FUNDS**

After receiving notification of the Title I, Part A grant amounts from GADOE, reservations in each budget are set aside for required components such as parent involvement, professional learning, neglected and delinquent, private school per pupil and equitable services, and homeless students. Administrative costs are also part of the reservations, which are not part of the schools' per pupil amounts. The remainder of Title I funds are allocated to schools based on per pupil allocation, as determined by the percentage of students qualifying for free and reduced price meals.

#### **Professional Development:**

There are no Title I schools in the Social Circle City School System designated as Priority or Focus Schools; therefore, the system is not required to spend ten percent of funds for this cause. A lesser amount is allowable in professional development for ensuring professional qualifications of teachers.

System leaders support schools in developing, revising, implementing and coordinating school improvement and schoolwide plans during regularly scheduled meetings of administrators and

other support personnel as applicable. During the meetings, data is analyzed to identify and develop solutions to challenges related to instructional strategies, parent and family engagement, professional learning, and budgets. Each school identifies professional learning needs through the comprehensive needs assessment process and development of school and system improvement plans. Professional learning priorities are reviewed by members of the District Change Leader Team to ensure alignment.

Professional Learning in SCCS is standards based, results-driven, and job-embedded. It is designed to improve student achievement by enhancing teacher content expertise and developing appropriate pedagogical skills. Professional Learning needs are assessed during the Comprehensive Needs Assessment process. Student achievement data, graduation data, and performance data are analyzed, and desired outcomes are stated. The Federal Program Director(s) and the Professional Learning Coordinator review the combined data to develop plans for professional learning that are both school and system based. Once plans are designed and approved, the focus becomes the implementation of quality professional learning. Evaluations of professional learning training sessions and the analysis of the evaluations are ongoing. Adjustments in content and skills to be addressed are continuous. Assessing, applying, and sustaining content knowledge and skills that educators need to improve student learning are priorities.

Professional learning will focus on increasing the ability of the teaching staff and administration to help all students achieve high academic standards and eliminate the achievement gap that separates low-income and minority students from other students. Social Circle City Schools will target local, state and federal funds to schools that have the lowest proportion of highly qualified teachers; have the largest average class size; or are identified for school improvement under section 1116(b). The SCCS will provide training to enable teachers, paraprofessionals and administrators to address the needs of students with different learning styles, particularly students with disabilities, students with special learning needs (including students who are gifted and talented), and students with limited English proficiency; improve student behavior in the classroom and identify early and appropriate interventions to help students; involve parents in their child's education; and understand and use data and assessments to improve classroom practice and student learning.

**Parent Involvement Required 1% Set Aside for Parental Involvement:** Systems receiving Title I allocation greater than \$500,000 must reserve at least 1-percent of its allocation for planning and implementing effective parental involvement activities to ensure that parents are provided opportunities and experiences that enable them to promote high student academic achievement and be involved in an effective partnership with the school. Social Circle City School System does not receive an allocation greater than \$500,000 and therefore is not required to set aside for Parent Engagement.

In the event SCCS is required, principals have the option of expending their 95% portion of the required 1% set aside in Parent Engagement funds or submitting them back to the system level. Principals, with input from parents, will typically decide to direct those funds to a system level parent engagement activity/project by signing a District-wide Parent Activity Assurance form.

The funds would then be used at the system level to fund a Family Engagement Specialist who serves all schools. Title I parents would be informed about the 1% set aside during the Fall Annual Meeting and participate in the discussion regarding this requirement each Spring during Title I planning meetings held at each school. If the total 1% is not expended, the difference must be carried over to the following fiscal year.

**Homeless Children and Youth:** **The SCCS does not receive direct funding from the McKinney Vento Homeless Program Children and Youth Assistance Act.** The system utilizes a home survey to identify homeless students. The system Homeless Liaison is consulted if any staff member suspects that a student qualifies for homeless services. The Homeless Liaison then investigates. Upon identification, homeless students are eligible for free and reduced priced meals, Title I services, and enrollment in the applicable gifted, special education, CTAE, remedial, and general education courses. Transcripts are evaluated by school counselors for students in grades 9-12 to ensure pupils are scheduled into the next appropriate course needed for graduation. In all grades, grades from accredited institutions are accepted without validation, and a homeless student's course of study is continued without disruption. The director for curriculum and instruction will be consulted in instances in which scheduling must be adjusted to enable a homeless pupil transferring into the system the opportunity to earn partial or pro-rated credit. The district submits, through the Consolidated Application and Student Record, information about the number of homeless children and reports educational and related support needs through an annual survey in the MyGaDOE portal.

The homeless liaison supervises and works very closely with the school guidance counselors, transportation and administrative services to assure students receive the services they need. School supplies will be issued as needed and/or requested. A portion of donated supplies shall be retained by each school for the purpose of assisting homeless students. When donated supplies have been depleted, students shall use Title I resources. Students in all four schools of SCCS may benefit from Title I Homeless Children and Youth set aside. Method 1 is the way SCCS determines set side amounts.

**Method #1: Identify Homeless Students' Needs and Fund Accordingly** The best way to determine the set-aside is to conduct an assessment of the number and needs of homeless children and youth residing in the local educational agency (LEA) and determine how much it costs to pay for the services that homeless children need and reserve that amount of Title I, Part A funds to pay for them. To make this determination, the LEA should look at how much it cost the previous year to have the Homeless Liaison fulfill the requirements set out in Section 722(g)(6) of the McKinney-Vento Homeless Assistance Act. In addition to coordinating the identification and school enrollment of homeless children, this provision of the law requires liaisons to inform parents of homeless children about "educational and related opportunities available to their children," assist parents of homeless children in accessing school transportation, and provide public notice of the educational rights of homeless children at places like soup kitchens and family shelters. Based on the previous year's cost data, the LEA can allocate the Title I, Part A set-aside, taking into account any anticipated changes in the population and/or of homeless students.

### **Neglected and Delinquent Children**

The reservation amount provided by GaDOE in the Title I, Part A allocation letter and worksheet is the amount set aside for neglected or delinquent children. The Annual Survey of Local Institutions for Neglected or Delinquent Children is completed each year and is based on the number of children residing at the home for 30 consecutive days, with at least one day being in October. The Social Circle City System has no neglected, delinquent, or residential facilities within its geographic borders.

### **Equitable Services for Private School Participation**

**Private schools in the Social Circle City School System eligible attendance area have declined to participate in federal activities.** Students attending a private school would be subject to the same PPA provisioning as current Social Circle City Schools students that are allocated according to attendance areas. The private school worksheet would be completed and attached to the Consolidated Application to ensure that all set asides related to parental involvement, instructional lead teachers, professional learning, and paraprofessionals have been reserved. The district uses the information provided by the GaDOE to determine reservations for parental involvement, FLP, Private Schools, indirect cost, and Neglected and Delinquent. Private and homeschooled students remain eligible for identification under Child Find for services through IDEA.

### **Pre-Kindergarten Programs**

There are no Title I-funded pre-kindergarten programs in the Social Circle City School System.

### **Public School Choice Related Transportation and Flexible Learning Programs**

**SCCS is not required to offer Public School Choice or Flexible Learning Programs (FLP) in the present fiscal year.** Should a school be identified as a Priority or Focus School, five percent of the LEA allocation will be set-aside for FLP.

## **SECTION 7**

### **NOTIFICATIONS TO PARENTS**

#### **NOTICES to PARENTS of ENGLISH LEARNERS PARTICIPATING in TITLE I or TITLE III SUPPLEMENTAL LANGUAGE PROGRAMS Section 1112(e)(3)**

If the district elects to provide supplemental language services for English learners using Title I or Title III funding, a letter must be sent to parents within the first 30 days of the school year or within two weeks of a student's eligibility for services. Letters are sent only to the parents of students served in the supplemental language program funded with federal dollars. A parent may decline these additional opportunities, which are offered in addition to regular EL services funded with state and local dollars.

The letter must indicate:

- the reasons for the identification of their child as an EL and in need of placement in a supplemental language instruction educational program;
- the child's level of English proficiency, how such level was assessed, and the status of the child's academic achievement;
- the methods of instruction used in the supplemental language program in which their child is, or will be, participating and the methods of instruction used in other available programs, including how such programs differ in content, instructional goals, and the use of English and a native language in instruction;
- how the program in which their child is, or will be, participating will meet the educational strengths and needs of their child;
- how such program will specifically help their child learn English and meet age-appropriate academic achievement standards for grade promotion and graduation;
- the specific exit requirements for the program, including the expected rate of transition from such program into classrooms that are not tailored for ELs, and the expected rate of graduation from high school (including four year adjusted cohort graduation rates and extended-year adjusted cohort graduation rates for such program) if funds under this part are used for children in high schools;
- in the case of a child with a disability, how such program meets the objectives of the individualized education program of the child, as described in section 614(d) of the Individuals with Disabilities Education Act (20 U.S.C. 1414(d)); and
- information pertaining to parental rights that includes written guidance—
  - detailing the right that parents have to have their child immediately removed from such program upon their request;
  - detailing the options that parents have to decline to enroll their child in such program or to choose another program or method of instruction, if available;
  - and assisting parents in selecting among various programs and methods of instruction, if more than 1 program or method is offered by the eligible entity

## **PARENT RIGHT to KNOW TEACHER and PARAPROFESSIONAL QUALIFICATIONS**

Parents are informed of their rights to know the qualifications of their child's teacher and paraprofessionals in multiple languages as appropriate. This information is made available through a school letter, student handbook/agenda book with a parent signature required, website, the Annual Title I Meeting, and other newsletters sent home with students.

All notices and information required must be in a uniform and understandable format, including alternative formats upon request and, to the extent practicable, in a language that parents understand. Parents may request and receive information regarding:

- Whether the student's teacher—
  - has met State qualification and licensing criteria for the grade levels and subject areas in which the teacher provides instruction;
  - is teaching under emergency or other provisional status through which State qualification or licensing criteria have been waived; and
  - is teaching in the field of discipline of the certification of the teacher.
- Whether the child is provided services by paraprofessionals and, if so, their qualifications.

If a student has been assigned to or has been taught for four or more consecutive weeks by a teacher who does not meet the professional qualifications outlined in the Every Student Succeeds Act (ESSA), parents are provided a written timely notice via letter sent home with students. Retired professionally qualified teachers are most often used to fill long-term substitute situations.

## **20 DAY NOTIFICATION**

Parents will be notified when their child has been taught for 20 days by a teacher who does not meet the school system's Professional Qualification (PQ) requirements as outlined in the Comprehensive LEA Improvement Plan (CLIP). Parents of special education students who have been taught for 20 days by a teacher who does not meet the Georgia Professional Standards Commission (GaPSC) certification requirements will also be sent a notification. Notifications must occur within 10 business days following the four consecutive weeks.

## **SCHOOL DESIGNATION STATUS**

A school identified as needing Comprehensive or Targeted Support Interventions will receive the support of the LEA and/or School Improvement Division of the GaDOE as appropriate. Parents will be notified of each school's designation status using multiple means of communication.

### **SCHOOL IMPROVEMENT LETTERS AND NOTIFICATIONS STATUS**

When required, sample academic designation (school status) notification letters and ESEA parental notification requirements are provided to Priority and Focus Schools. The letters describe the current academic designation status and relative ESEA requirements for schools. In addition to these letters, the LEA provides to each school a dated annual notification letter as an additional mechanism of informing all parents of their rights regarding federal programs, FERPA, etc. These letters, which indicate each school's status and provide contact information for school officials, are sent home with students at the beginning of school, and the information is also reviewed at the Annual Title I Meeting. Documentation of when and how the letters are sent to parents is required to be kept within the school's Title I and Title II notebooks. School improvement information can also be accessed on the system and each school's website.

### **FLEXIBLE LEARNING PROGRAM (FLP) NOTIFICATION**

For any identified Priority and Focus Schools, two annual notifications are made to parents/guardians regarding the Flexible Learning Programs (FLP). These notifications are mailed to parents via the U.S. Postal Service, with additional notification through newspaper articles and the website of the Social Circle City System.

### **CORRESPONDENCE IN OTHER LANGUAGES**

All LEA/school correspondences to parents are sent in an understandable and uniform format and, to the extent practicable, provided in a language that the parents can understand. When parents need correspondence in another language, efforts are made to provide either written support or support through an interpreter. The ESOL, as well as other school staff who are fluent in other languages, supports these efforts. The LEA utilizes code of ethics trained personnel as well as technological applications to provide assistance to schools when needing translation of a document or interpretation, and high school foreign language instructors are sometimes requested to assist in this task. The system has partnered with Language Line services to provide immediate telephonic interpretation services to parents and school personnel.

### **LEA PARENT & FAMILY ENGAGEMENT POLICY/PLAN**

Each school is required to communicate in multiple ways the annual LEA Parent and Family Engagement Policy/Plan, which is also posted on the school and system websites. It is available in the front office of the Board of Education and each school. Parents receive a paper copy in the form of a flyer at the beginning of each school year.

## **SECTION 8**

### **PARENT AND FAMILY ENGAGEMENT**

#### **GUIDANCE: SCHOOL LEVEL PARENT AND FAMILY ENGAGEMENT** **EXPECTATIONS/PROCEDURES Title I, ESSA - Section 1116**

The school system will put into operation programs, activities, and procedures for the engagement of parents and family members in all of its schools with Title I, Part A programs. These programs, activities, and procedures will be planned and operated with meaningful consultation with parents and family members of participating children. Each Title I school will:

- Involve parents, in an organized, ongoing, and timely way, in the planning, review, and improvement of programs under Title I, Part A, including the planning, review, and improvement of the school parent and family engagement policy and the joint development of the school-wide program plan under Section 1114(b) of the Every Student Succeeds Act (ESSA).
- Update the school parent and family engagement policy periodically to meet the changing needs of parents and the school, distribute it to the parents of participating children, and make the parent and family engagement policy available to the local community.
- Provide full opportunities, to the extent practicable, for the participation of parents with limited English proficiency, parents with disabilities, and parents of migratory children, including providing information and school reports required under Section 1111 of the ESSA in an understandable and uniform format, including alternative formats upon request and, to the extent practicable, in a language parents understand.
- If the schoolwide program plan under Section 1114(b) of the ESSA is not satisfactory to the parents of participating children, submit any parent comments on the plan when the school makes the plan available to the local educational agency.
- Be governed by the following statutory definition of parent and family engagement and will carry out programs, activities, and procedures in accordance with this definition:

Parent and family engagement means the participation of parents in regular, two-way, and meaningful communication involving student academic learning and other school activities, including ensuring:

- a) Parents play an integral role in assisting their child's learning
- b) Parents are encouraged to be actively involved in their child's education at school
- c) Parents are full partners in their child's education and are included, as appropriate, in decision-making and on advisory committees to assist in the education of their child
- d) Other activities are carried out, such as those described in Section 1116 of the ESSA

Each Title I school will develop a Parent and Family Engagement Policy/Plan that gives additional attention to the areas indicated below:

- 1) Develop jointly with, and distribute to, parents and family members of participating children a written parent and family engagement policy, agreed on by such parents, that shall describe the means for carrying out the requirements of Section 1116. Parents shall be

notified in an understandable and uniform format and, to the extent practicable, provided in a language that parents can understand. Such policy shall be made available to the local community and updated periodically to meet the changing needs of parents and the school.

- 2) Convene an annual meeting, at a convenient time, to which all parent of participating children shall be invited and encouraged to attend, to inform parents of their school's participation under Title I and to explain Title I, its requirements, and to right of parents to be involved.
- 3) Offer meetings using a flexible schedule, such as meetings in the morning or evening, and may provide, with funds provided under Title I, transportation, child care, or home visits as such services relate to parent and family Engagement to eliminate parent and family engagement barriers.
- 4) Involve parents, in an organized, ongoing, and timely way, in the planning, review, and improvement of programs under Title I, including the planning, review, and improvement of the school Parent and Family Engagement Plan and the joint development of the school-wide program plan under section 1114(b), except that if a school has in place a process for involving parents in the joint planning and design of its programs, the school may use that process, if such process includes an adequate representation of parents of participating children.
- 5) Provide parents of participating students timely information concerning:
  - a) Title I programs in the school.
  - b) A description and explanation of the curriculum in use at the school, the forms of academic assessment used to measure student progress, and the achievement levels of the challenging State academic standards; and
  - c) If requested by parents, opportunities for regular meetings to formulate suggestions and to participate, as appropriate, in decisions relating to the education of their children and respond to any such suggestions as soon as practically possible.
- 6) If the school-wide program plan under Section 1114(b) is not satisfactory to the parents of participating children, submit any parent comments on the plan when the school makes the plan available to the LEA.
- 7) Jointly develop with parents for all children served under Title I a School-Parent Compact that outlines how parents, the entire school staff, and students will share the responsibility for improved student academic achievement and the means by which the school and parents will build and develop a partnership to help children achieve the state's high standards. Such compact shall:
  - a) Describe the school's responsibility to provide high-quality curriculum and instruction in a supportive and effective learning environment that enables the children served under Title I to meet the challenging academic standards, and the ways in which each parent will be responsible for support their children's learning, such as monitoring attendance, homework completion, and television watching; volunteering in their child's classroom; and participating, as appropriate, in decisions relating to the education of their children and positive use of extracurricular time.
  - b) Address the importance of communication between teachers and parents on an ongoing basis through, at a minimum:

- i. Parent-teacher conferences in elementary schools, at least annually, during which the compact shall be discussed as the compact relates to the individual child's achievement;
  - ii. Frequent reports to parents on their children's progress;
  - iii. Reasonable access to staff, opportunities to volunteer and participate in their child's class, and observation of classroom activities; and
  - iv. Ensuring regular two-way, meaningful communication between family members and school staff, and, to the extent practicable, in a language that family members can understand.
- 8) Provide assistance to parents of children served by the school, as appropriate, in understanding such topics as the challenging state academic standards, state and local academic assessments, the requirements of Title I, how to monitor a child's progress, and work with educators to improve the achievement of their children.
- 9) Provide materials and training to help parents work with their children to improve their achievement, such as literacy training and using technology (including education about the harms of copyright piracy), as appropriate, to foster parental involvement.
- 10) Educate teachers, specialized instructional support personnel, principals, and other school leaders, and other staff, with the assistance of parents, in the value and utility of contributions of parents and in how to reach out to, communicate, and work with parents as equal partners, implement and coordinate parent programs, and build ties between parents and the school.
- 11) To the extent feasible and appropriate, coordinate and integrate parental involvement programs and activities with other federal, state, and local programs, including public preschool programs, and conduct other activities, such as parent resource centers, that encourage and support parents to fully participate in the education of their children.
- 12) Ensure that information related to school and parent programs, meetings, and other activities is sent to the parents of participating children in a format and, to the extent practicable, in a language the parents can understand.
- 13) Develop appropriate roles for community-based organizations and businesses in parent and family engagement activities, including providing information about opportunities for organizations and businesses to work with parents and schools, and encouraging the formation of partnerships between elementary, middle, and secondary schools and local businesses that include a role for parents
- 14) Conduct other activities, as appropriate and feasible, such as parent resource centers and opportunities for parents to learn about child development and child rearing issues beginning at the birth of a child, that are designed to help parents become full partners in the education of their children.
- 15) To the extent practicable, provide opportunities for the informed participation of LEP parents and family members, parents of migratory children, and parents and family members with disabilities including providing information related to school and school reports required under Section 1111 in a format and, to the extent practicable, in a language such parents understand.

## **SCCS PARENT and FAMILY ENGAGEMENT**

Social Circle Schools focus heavily on affording parents substantial and meaningful opportunities to participate in the education of their children. The purpose of parental involvement under Title I, Part A is to promote active involvement of parents as partners with the school. It is the goal of SCCS to ensure that Title I parents and their children receive services and assistance that will lead to improved academic achievement. SCCS recognizes that parents are an integral part of a child's success in school, starting with the concept of being the child's first teacher. As a conduit for their children's success, the district will assist parents of all socioeconomic levels in solidifying their ongoing commitment to their child's success.

Each school is required to nominate a parent representative for the district Superintendent's Parent Advisory Council. At the beginning of each year, the parent advisory names, addresses, phone numbers and e-mail addresses are submitted to the superintendent, who utilizes them as the system's advisors for the purpose of reviewing required components of the Strategic Plan, the LEA Parent and Family Engagement Policy, and federal program requirements (CLIP, budgets, parent and family engagement). Invitations to the meetings are via phone calls and e-mails. The Superintendent's Parent Advisory Council and other open meetings serve as the mechanisms for the annual evaluation of the LEA Parent and Family Engagement Policy, which is also posted on the system website for feedback. Schools also use their parent advisors to review the required components of all federal programs. In addition, School Councils also serve as parent advisors. School Council meetings are open to the public and are announced flyers, newsletters, marquees and/or websites. Parents are instrumental in the revision of the School Improvement Plan, Parent and Family Engagement Policy, and School-Parent Compacts as well as the system-level Parent and Family Engagement Policy. School Councils review the results of the annual surveys and help make decisions for yearly parent and family engagement activities. The system Parent and Family Engagement Plan is published annually on the district webpage and is available in the front office of the Board of Education.

## **PARENTAL ENGAGEMENT POLICIES/PLANS SEC. 1116(b) SEC. 1116(c) SEC. 1116(d) SEC. 1116(e) SEC. 1116(f)**

Title I, Section 1118 of the Elementary and Secondary Education Act of 1965 (ESEA) requires that each school receiving Title I, Part A funds develop jointly with, agree on with, and distribute to parents of participating children a written parental involvement policy. All children at SCPS and SCES participate in Title IA.

Social Circle City School System is committed to cultivating and sustaining partnerships with parents and community stakeholders, and encourages their participation in the development, implementation, review and evaluation of its parental involvement policy/plan. This written policy/plan focuses on improving academic achievement and school performance and outlines how the system will coordinate, provide technical assistance and other support to schools in planning and implementing effective parental involvement activities, training, and workshops. The LEA, school, parents, and community stakeholders will jointly develop and agree on the Parental Engagement Policy/Plan which will describe the means for carrying out Title I, Part A requirements. The policy/plan will be made available to the local community and parents of

students enrolled in the SCCS using multiple means. The policy/plan will be available on the Title I page of the district's website (www.socialcircleschools.com), on individual schools' websites, sent home with students in flyer form, in hard copy format in the main office of each school and the Board of Education, and in various other locations.

### **PARENT AND FAMILY ENGAGEMENT SURVEYS/INPUT**

***Process to Collect:*** Schools hold individual meetings in the spring for review of the system and school Parent Engagement Plans. All Title I parents, teachers, administrators, and other school personnel in the system are invited to the meetings to provide input. Parents and other stakeholders are to be notified by invitation sent by each individual school. Parents who cannot attend the meetings will be given the opportunity to obtain a copy from the main office of each school and submit input before final revisions are approved. The LEA Parent Engagement Policy checklist will be applied to district and school plans. Revision dates will be clearly marked on each plan. The Family Engagement Coordinator and/or the Title I Director will review plans before or during on-site monitoring visits.

An annual survey is provided to schools. Advertisement of the survey and requests for completion occur through automated phone calls, newsletters, the website, and other announcements. Parents are informed of the availability of a paper survey as well as web-based. The surveys are collected and compiled and the following year's parent and family engagement activities are built from the responses.

***Process to Review:*** The results of the survey are shared among several groups of stakeholders, including, but not limited to, parents, school and central office employees, and community members. School Governance Teams and those attending Annual Title I Meetings. The results of the survey are used to review and revise schoolwide and parent engagement plans and components.

#### **Actions Taken by LEA to Improve the Quality and Effectiveness of Parent and Family Engagement Policies and Practices:**

The Title I Director and Family Engagement Coordinator review the annual survey results, as well as all feedback received during the annual needs assessment process. Additions/deletions/revisions are discussed and agreed upon during this meeting. Formatting and revisions are made after the meeting and then provided to stakeholders for review and suggestions. Parent involvement workshops and activities are planned for the following year based on information gained during the annual needs assessment process. Materials are also purchased for parent resource centers based on expressed needs. Many opportunities are provided for building strong parent capacity. The purpose is to ensure effective parental involvement and to support a partnership among schools, parents, and the community to improve student academic achievement, through the following activities: Annual meetings; Conferences; E-mail communications; Phone calls; Parent workshops and activities; Home visits, Family nights; Volunteering; Parent advisory meetings; Open Houses; Annual notification of school designation; Newsletters/flyers/brochures; Website information; Annual notification of School Improvement status (if applicable), Remind 101, School Governance meetings; and Board of Education meetings.

### **Distribution**

The policy/plan will be made available to the local community and parents of students enrolled in the SCCS using multiple means. The policy/plan will be available on the Title I page of the district's website (www.socialcircleschools.com), on individual schools websites, sent home with students in flyer form, in hard copy format in the main office of each school and the Board of Education, and in various other locations. Copies are also available in Parent Resource Centers.

Plans include district and school improvement/schoolwide plans, engagement policies, school compacts, comprehensive LEA improvement plan, parents' right to know, complaint procedures, and policy on ethics and fraud, waste and abuse. Many of these plans are included in student agendas. An automated calling system and information in first day packets inform parents about the availability of these plans.

### **SCHOOL-PARENT COMPACT**

The jointly developed compact, revised annually, reflects the district and school academic achievement goals and includes responsibilities for the school, parent, and students. The LEA informs all schools of the requirement of distribution of the School-Parent Compact in a timely manner (by the end of October).

Schools are expected to use the template provided by the state to ensure all components and content are in compliance. The Title I Director reviews plans with the principals and PEC in June and technical assistance provided as needed. Input, distribution and content follow the same procedures as the development of Parent Engagement Plans. Compacts are to be posted on the school websites and in a language parents can understand.

All Title I schools, School-Parent Compacts, are distributed to all students in the registration/enrollment packet and reviewed at the Annual Title I Meeting. It is the responsibility of the Principal and the Parent Engagement Coordinator to make sure that all compacts are jointly developed, reviewed and revised annually. The parent compacts will reflect the district and school academic achievement goals and includes responsibilities for the school, parent, and students. Each participant must have a separate signature and date line. **The revision date will be clearly marked on each compact.**

Copies of the signed School-Parent Compacts are kept on file at the school and a random sample of these copies are placed in the school's Title I documentation files for review by the LEA. Compacts are to be posted on the school websites and in a language parents can understand.

### **Parental Input on School Compacts**

It is the responsibility of the principal, in coordination with the school system Family Engagement Coordinator, to make sure that all compacts are reviewed and revised annually with input from parents and families. The review and revision will occur in the Spring of the year at annual planning meetings, school governance meetings, and parent workshops. Revision dates will be clearly marked on each compact. An invitation will be sent home to all parents in the

school and meeting dates will be publicized in school newsletters, local newspapers, and on each school's web site. The Family Engagement Coordinator will be responsible for coordinating with schools to schedule meetings and collect required information (agenda, meeting notes, and sign in sheets). Parent compacts will include responsibilities for the teachers, parents, and students. Compacts will be distributed to all parties involved for signatures each fall. Copies of the signed parent compacts are kept on at the school level.

The school must provide evidence of parent comments/input into the development of the School-Parent Compact, age appropriateness of the compact, and samples of completed compacts with dates and appropriate signatures.

### **PARENT RESOURCE CENTER (PRC)**

All Title I schools have Parent Resource Centers (PRC) containing a variety of materials, supplies, books, technology, media, and resources available to parents for use at the school or for checkout to supplement academic instruction at home. Parents are informed of their school's Parent Resource Center through presentations made at the Annual Title I Meeting as well as through flyers/newsletters. Websites are also used to distribute information regarding the materials and resources available to parents. PRC and other parent and family engagement resources provided by GaDOE through webinar sessions are shared with Title I school principals, who are responsible for planning parent and family engagement initiatives and disseminating information in their schools.

### **ANNUAL TITLE I MEETING**

All Title I schools are required to hold an annual meeting and submit required documentation, which includes a copy of the invitation/notice to all parents, agendas, and sign-in sheets. The meeting will be held at a convenient time for all Title I parents to learn about the requirements listed in Section 1116. These items will be placed in the school-level Title I documentation files. A presentation (Power Point, or other like program) describing the requirements of Title I is provided to schools for technical assistance to ensure communication of the required components of the Title I program, including the School Improvement Plan, LEA and school Parent and Family Engagement Policies, School-Parent Compact, and Flexible Learning Program if applicable – as well as the need to review and revise these plans with parents. Meetings are announced via written notice, message recordings, school marquees, and advertisements to parents on the school websites. The Annual Title I Meeting must be held in a timely manner (by the end of October). A second meeting is offered at an additional time for those unable to attend the scheduled meetings at the school(s).

### **PARENT CAPACITY/LEA TECHNICAL ASSISTANCE**

Information is provided to school personnel and parents on how to build parent capacity through presentations made during meetings, through response to parent needs on surveys, through information received from the GADOE Parent Engagement department, and through student handbooks, newsletters, and flyers. Guidance and sample communications to schools are provided by the LEA for the development of Parent and Family Engagement Plans, Parent and Family Engagement Policies, and School-Parent Compacts. Evidence of this training must be

maintained in the school-level Title I documentation files, which will be reviewed by the Title I director using the GaDOE Building Parent Capacity Checklist.

Developed parent engagement activities are to be aligned to school improvement initiatives is a part of the School Improvement Process. The building principals and the Family Engagement Coordinator consider and plan based on the six requirements for building capacity by answering the following questions:

1. What strategies/materials have been offered to parents on understanding academic content standards?

(ex: Parent Resource Center, monthly activities on items requested on surveys, booklets, pamphlets (i.e., homework help), monthly newsletters, Math Nights for Parents, Books, parent meetings for orientation/content; workshops on literacy, parent nights, books available for checkout, brochures, handouts, Home-School Connection newsletter)

2. What training has been offered to parents related to literacy and the use of technology?

(Family Literacy Day, monthly newsletters, handouts, technology assistance..)

3. How have faculty and staff been encouraged to communicate with and involve parents in their child's education?

(Letters sent home encouraging parents to contact teacher, principal, or counselor to schedule conferences, view information on website, communicating by phone, e-mail or social media (Remind, Talking Points), suggestion boxes, open door policy, e-mail addresses to parents, PTO, agenda use, early AM/extended hours, home visits, mail, teleconference, parenting classes.)

4. What efforts have been made to foster parental involvement in prekindergarten programs?

(Transition meetings, collaborative meetings at Head Start..)

5. What attempts have been made to communicate parental involvement information to parents using language parents can understand?

(Google Translate, Talking Points, home visits, interpreted phone calls via Language Line)

6. What other support do parents receive for parental involvement activities?

(Communities in Schools, Relay for Life, AdvancED/SACS, Veterans Day Program, Breast Cancer Awareness, collections for food banks/clothing banks....Each of these provide opportunities for other adults and entities to share in the education process; some by volunteering personally and others through donation of their organizations' time or talent as well as material or monetary resources)

7. How have parents been involved in the decision-making for their child? For the school?

a) For their child? - RTI meetings, IEP meetings, conferences with teachers, School Council, Personal Advisements, surveys

b) For the school? - PAC, School Council, AdvancED (SACS), Title I Parent and Family Engagement, PTO meetings, Title I Parent Advisory Council and annual meetings

8. What information has been distributed to parents about helping their children learn at home?

(Newsletter, website-school and individual, special programs: Math Calendars and Activities, Literacy Day, teacher websites (flash cards, assignment, homework, directions for math, vocabulary...), accessing on-line educational websites, test-taking tips, study guides and tips, teacher websites)

9. How have parents been encouraged to volunteer at the school?

(Poster in front hall, handbook, PTO meetings, newsletter, website, clubs, family events (Thankful for Families, Veterans Day...), car pick-up line, complete surveys, notes from teachers and counselors, personal invitations, opportunities to volunteer in classrooms, media center, cafeteria, chaperoning, assist with assemblies, tutoring, festivals, and room parents)

The Title I Director works with schools to provide training for principals and parent involvement coordinators to understand the six areas for building capacity. Schools are expected to document their efforts in building capacity in each of the required areas. Principals are responsible for working with their PEC coordinators to plan how they will address these six areas and provide documentation to the Director of Support Services at the end of each year.

Technical Assistance is provided through a variety of avenues:

- Professional learning sessions during administrative and curriculum meetings.
- Professional learning sessions conducted during faculty meetings
- One on one meetings held at each school site between the DSS (Title I director) and/or Family Engagement Coordinator and school leaders.
- The creation and sharing of a Federal Programs Handbook.
- Technical assistance with planning, organizing, and conducting parent meetings.
- Ongoing emails and phone calls.

Schools are informed of requirements regarding:

- 1) School Parent Involvement Plan
  - a) Parents must be involved in development
  - b) DSS provides template for schools to use as starting point – schools may choose either traditional or innovative template
- 2) Compact
  - a) Parents must be involved in development
  - b) Outlines how parents, staff, and students share responsibility for improved academic achievement
  - c) DSS provides template for schools to use as starting point – schools may choose either traditional or innovative template
- 3) Annual Meeting

- a) Held at a time convenient for parents
- b) Provides opportunity for parents to learn about their school's participation in Title I, the 1% set aside and how their child will be served in Title I (if required)
- 4) Educating staff in the value and utility of parents
  - a) Principals at Title I schools are required to offer on-going training to staff regarding the value and utility of parents. Principals provide training at faculty meetings, before parent/teacher conferences, and at other timely events.
  - b) The DSS provides on-going training to Title I principals on the value and utility of parents
- 5) Notifying parents that their child attends a Title I school
  - a) Signage inside and outside of schools
  - b) Indicate Title I status on school website
  - c) Indicate Title I status on school newsletters and Title I newsletter

The Title I Director provides technical assistance for schools as they plan and implement parent engagement activities designed to improve academic achievement. The director meets with the Title I school principals to review parent involvement requirements along with the 1% set-aside in the Title I budget for parent involvement activities, (if applicable).

### **Monitoring of Building Parent Capacity**

The Social Circle City School System (SCCS) monitors its schools continuously to ensure that parents are involved at Title I schools. The GaDOE Parental Engagement Compliance and Parent Notification Checklist is used by the Director of Support Services to ensure that schools are completing all requirements. There are regularly scheduled meetings with the Parent Engagement Coordinator to review parent involvement requirements. The PEC provides documentation to the Director of Support Services at the end of each year.

Opportunities for all parents at each Title I school to build their capacity in supporting the education of their child as documented by the district office per Title I school using a checklist that includes evidence of:

- In Person meeting such as the Annual Title I meeting or online options as the primary method of building parent capacity
  - Agendas with topics such as the challenging State academic standards; State and local academic assessments; Title I, Part A requirements; how to monitor a child's progress and work with educators to improve the achievement of their children; such as literacy training and using technology (including education about the harms of copyright piracy); other reasonable support as parents may request
  - Presentation slides, training materials, handouts, or meeting minutes / notes that show evidence of topics discussed
  - Sign-in sheets with date, roles of attendees, and signatures of parents
  - Methods (2 or more) of invitation to all Title I parents and family members
- Continuous communications with parents such as using the parent portal, social media postings, text messages, or links to articles, videos, newsletters, tip sheets, flyers handouts, brochures, website screenshots, and other online resources relevant to the topics such as the challenging State academic standards; State and local academic

assessments; Title I, Part A requirements; how to monitor a child's progress and work with educators to improve the achievement of their children; such as literacy training and using technology (including education about the harms of copyright piracy); other reasonable support as parents may request

### **REQUIRED 1% SET ASIDE for PARENTAL ENGAGEMENT**

SCCS currently does not have an annual budget exceeding \$500,000 thus is not required to set aside 1% for parent engagement. However schools opt to reserve funds in the budget to increase parent capacity for engagement and the system employs a Parent Engagement Coordinator who serves all Title I Schools.

In the event the allocation exceeds \$500,000 principals will have the option of expending the 1% in Parent Involvement funds or submitting them back to the system level. Principals, with input from parents, will provide input to direct those funds to a system level parent engagement activity/project. The funds will be used at the system level to fund a portion of the salary for a Family Engagement Coordinator who serves all schools. Title I parents are to be informed about the 1% set aside during the Fall Annual Meeting and participate in the discussion regarding this requirement each Spring during Title I planning meetings held at each school.

### **BUILDING STAFF CAPACITY**

Each Title I school educates its teachers, leaders, and other staff in the value and utility of contributions of parents. Schools will provide training on ways to build parent capacity through at a minimum two methods per semester. Trainings should include: best ways to reach out to, communicate with, and work with parents as equal partners, communicate with EL parents, implement and coordinate parent programs, and build ties between parents and the school. Each school is required to develop ways to engage parents as a part of the school improvement process. This training should be led by the principal.

The first training must be at an in-person or online faculty meeting, while the other methods may include emails with links to articles, social media postings, online training videos, tip sheets, flyers, brochures, website screenshots, and other online resources.

Effective with FY18, parents must also be surveyed regarding topics on which training designed to build staff capacity for working with families should be provided.

#### **Monitoring of Building Staff Capacity**

Documentation must be maintained by retaining sign in sheets and agendas. The principal and the Title I Director using the GaDOE Building Staff Capacity Checklist will monitor trainings.

Schools must provide evidence of:

- In person or online faculty meetings as primary method of building school staff capacity

- Agendas with topics such as the value and utility of contributions of parents; how to reach out to, communicate with, and work with parents as equal partners; implement and coordinate parent programs; build ties between parents and the school; how to coordinate and integrate programs and activities with other Federal, State, and local programs including public preschool programs and parent resource centers; how to ensure information is sent to parents in a format and to the extent practicable in a language that parents can understand; the Family and Community Engagement Structures of Georgia's Systems of Continuous Improvement
  - Presentation slides, training materials, handouts, or meeting minutes/notes that show evidence of topics discussed
  - Sign-in sheets with date, roles of attendees, and signatures of teachers, specialized instructional support personnel, principals, other school leaders, and other school staff
- Continuous communications with faculty such as emails with links to articles, social media postings, online training videos, tip sheets, flyers, handouts, brochures, website screenshots, and other online resources.

**SECTION 9**  
**TITLE I, PART A**  
**IMPROVING the ACADEMIC ACHIEVEMENT of the DISADVANTAGED**

**OVERVIEW**

Title I, Part A is a part of the Elementary and Secondary Education Act of 1965 as amended by the Every Student Succeeds Act (ESSA). This Act provides federal funds through the Georgia Department of Education to local educational agencies (LEAs) and public schools with high numbers or percentages of poor children to help ensure that all children meet challenging State academic content and student academic achievement standards.

Social Circle City Schools targets the Title I, Part A funds received to schools with the highest percentages of children from low-income families. These funds may be used for children from preschool aged to high school but SCCS elects to direct funds particularly to the primary and elementary schools. Title I, Part A is designed to support State and local school reform efforts tied to challenging State academic standards in order to reinforce and enhance efforts to improve teaching and learning for students. Title I, Part A programs must be based on effective means of improving student achievement and include strategies to support parental involvement.

While required under Title I, Part A local educational agencies (LEAs) are required to provide services for eligible private school students if so desired. At this time, no private school entity has selected to participate in the Title I, Part A program.

The SCCS Title I, Part A Program Office provides technical assistance, resources, and program monitoring of SCCS Title I schools to ensure that all children have an opportunity to obtain a high quality education and to achieve proficiency on high academic standards.

**TITLE I DIRECTOR JOB DESCRIPTION**

Director Under the direction of the Assistant Superintendent for Teaching and Learning, the Title I Director will carry out the following duties:

- Coordinate, monitor, and provide technical assistance to schools for Title I, Part A
- Monitor program implementation of all Title I schools to ensure compliance with system, state and federal guidelines
- Monitor all purchases to ensure that expenditures are allocable, reasonable, and necessary. Ensuring all system policies for purchasing, expending funds, and inventorying equipment are followed to avoid fraud, waste, abuse, and corruption. No items will be purchased without prior approval, and all items purchased must be a part of the approved budget.

- Approve each purchase requisition/order, travel expense statement and professional learning (PL) leave that is funded through Title IA. Meet with the Business Office as needed and request financial reports to ensure alignment and balance on at least a monthly basis. Meet with and/or email principals or designees to ensure accuracy of school budgets.
- Ensure system and school inventories are maintained electronically and kept up to date.
- Complete a physical inventory check at each facility each year. Purchase Orders are pulled from object codes 615, 616 to verify if each item is included in each school's and the central office's inventory.
- Ensure training occurs on the responsibility regarding fraud and the channels to report it if suspected annually.
- Coordinate with directors/coordinators for each federal program with the exception of Special Education.

### **Federal Programs Secretary**

Under the direction of the Federal Programs Directors, the Federal Programs Secretary will carry out the following duties for Title I:

- Assists the Business Services Department with processing purchase requisitions, verifying available funds for accounts charged to system accounts, and payment of invoices.
- Reviews financial information for potential budget variances and assists to ensure fund balances are accurate.
- Maintains a wide variety of financial records to ensure compliance and the availability of documentation.
- Reviews purchase requisitions, travel expense statements, and registration payments for compliance and accuracy.
- Assists auditors by providing supporting documentation and/or information on internal processes (including financial documents, professional learning documentation, equipment inventory, and all Title IA cross functional monitoring documents)

### **ANNUAL TITLE I MEETING**

All Title I schools are required to hold an annual meeting and submit required documentation, which includes a copy of the invitation/notice to all parents, agendas, and sign-in sheets. The meeting will be held at a convenient time for all Title I parents to learn about the requirements listed in Section 1116.

These items will be placed in the school-level Title I documentation files:

- A PowerPoint or other presentation describing the requirements of Title I
- An agenda
- Sign in sheets

The presentation includes the School Improvement Plan, LEA and school Parent and Family Engagement Policies, School-Parent Compact, and Flexible Learning Program if applicable – as well as the need to review and revise these plans with parents.

Meetings are announced via written notice, message recordings, school marquee, and advertisements to parents on the school websites. The Annual Title I Meeting must be held in a timely manner (by the end of October). Two opportunities for meetings to facilitate the scheduling needs of parents are to be offered. Sign-in sheets and agendas are required and collected from the Annual Title I Meeting.

### **DATA ANALYSIS**

Social Circle City Title I Schools utilize system assessment summary reports to provide visual representation of data as the data relates to District and School Improvement Plans. All data are disaggregated by sub-group and to the individual student level. The Assessment Director presents data to the board of education annually and provides a summary of all test data for leadership and board members. School administrators receive ongoing technical assistance and training in the use of data during regularly scheduled principals' meetings, professional learning session, and data meetings. During the spring and summer, central office personnel and school-level personnel analyze progress toward targets at both levels and begin to formulate action plans to address the critical needs the data reveals. The data are shared with parents and community stakeholders who offer suggestions on the Comprehensive LEA Improvement Plan (CLIP) components – the Comprehensive Needs Assessment and the District Improvement Plan. The District Improvement Plan describes critical issues, goals, timelines, and strategies for implementation. Teachers have access to the most recent as well as longitudinal data through the Statewide Longitudinal Data System (SLDS), ACCESS for ELL's, Georgia Alternative Assessment (GAA), Georgia Kindergarten Inventory of Developing Skills (GKIDS), Teacher and Leader Keys Effectiveness Systems (TKES/LKES) reports, surveys; annual stakeholder surveys, demographic reports such as Student Record and FTE; and specific student needs (i.e., sub-groups as illustrated in the College and Career Ready Performance Index [CCRPI] measures), and the school system's Measure of Academic Progress (MAP) data. (See CLIP)

### **NEEDS ASSESSMENT**

Social Circle City Schools are required to provide documentation of the system's needs. The annual needs assessment is conducted through the continuous improvement process and the data revealed from analysis of the Georgia Milestones Assessment System, ACCESS for ELLs, Georgia Alternate Assessment, and Georgia Kindergarten Inventory of Developing Skills (GKIDS) as well as other state and national tests; Teacher and Leader Keys Effectiveness Systems (TKES/LKES) reports; annual stakeholder surveys; demographic reports such as

Student Record and FTE; and specific student needs (i.e., sub-groups as illustrated in the College and Career Ready Performance Index [CCRPI] measures). Action plans are developed for the areas in need of improvement and then expenditures are aligned accordingly. (see CLIP) Sign-in sheets and agendas are required and collected from meetings.

### **TITLE I, PART A SCHOOL-WIDE PROGRAMS**

The purpose of schoolwide Title I programs is to improve the entire educational program in a Title I school, which should result in improving the academic achievement of all students, particularly the lowest-achieving students. The goal of such a program is to assist the lowest-achieving students to demonstrate proficiency on academic achievement standards.

A Title I schoolwide program is a comprehensive reform strategy designed to upgrade the entire educational program in a Title I school. Under the ESEA section 1114(a)(1), as amended by ESSA, as school may operate a schoolwide program if it meets any of the following conditions:

- A Title I school with 40 percent or more of its students living in poverty, regardless of the grades it serves.
- A Title I school that receives a waiver from GaDOE to operate a schoolwide program without meeting the 40 percent poverty threshold.

This schoolwide reform strategy requires a school to:

- Conduct a comprehensive needs assessment.
- Identify and commit to specific goals and strategies that address those needs.
- Create a comprehensive plan.
- Conduct an annual evaluation of the effectiveness of the schoolwide program and revise the plan annually or as necessary.

Adopting this strategy should result in an ongoing, comprehensive plan for school improvement that is owned by the entire school community and tailored to its unique needs. Schoolwide programs are not required to identify specific students as eligible. They must supplement (enhance) rather than supplant (take the place of) the services participating students would receive if they were not participating in the schoolwide program.

### **Components of a Schoolwide Program**

Each schoolwide program must create a plan to address the eighteen components, ten of which are required, of a schoolwide program listed below:

1. Use such program's resources to help participating children meet the state's challenging student academic achievement standards expected for all children.
2. Use effective methods and instructional strategies that are based on evidence based research directly tied to the comprehensive needs assessment and academic standards that strengthens the core academic program of that school and that:
  - a. Provide opportunities for all children in the school to meet or exceed Georgia's proficient and advanced levels of student performance.
  - b. Are based upon effective means of raising student achievement.

- c. Use effective instructional methods that increase the quality and amount of learning time.
  - d. Address the needs of all children, particularly targeted populations, and address how the school will determine if such needs have been met and are consistent with improvement plans.
3. Provide instruction by highly qualified teachers.
4. Professional development for the staff to enable all children in the school to meet performance standards.
5. Strategies to increase parental involvement.
6. Plans for assisting preschool children in the transition from early childhood programs to local elementary school programs.
7. Measures to include teachers in the decisions regarding the use of assessments to provide information on, and to improve, the performance of individual students and the overall instructional program.
8. Coordination and integration of federal, state, and local services and programs.
9. Activities to ensure that students who experience difficulty mastering standards shall be provided with effective, timely assistance, which shall include:
  - a. List state and local educational agency programs and other federal programs that will be included.
  - b. Description of how resources from Title I and other sources will be used.
  - c. Plan developed in coordination with other programs, including those under the School-to-Work Opportunities Act of 1994, the Carl D. Perkins Vocational and Applied Technology Act, and National and Community Service Act of 1990.
10. Activities to ensure that students who experience difficulty mastering standards shall be provided with effective, timely assistance, which shall include:
  - a. Measures to ensure that a student's difficulties are identified on a timely basis.
  - b. Periodic training for teachers in the identification of difficulties and appropriate assistance for identified difficulties.
  - c. Teacher-parent conferences that detail what the school will do to help the student, what the parents can do to help the student and additional assistance available to the student at the school or in the community.
11. Description of how individual student assessment results and interpretation will be provided to parents.
12. Provisions for the collection and disaggregation of data on the achievement and assessment results of students.
13. Provisions to ensure that disaggregated assessment results for each category are valid and reliable.

14. Provisions for public reporting of disaggregated data.

15. Plan developed during a one year period, unless the LEA, after considering the recommendation of its technical assistance providers, determines that less time is needed to develop and implement the schoolwide program.

16. Plan developed with the involvement of the community to be served and individuals who will carry out the plan including teachers, principals, other school staff, pupil service personnel, parents and students (if secondary).

17. Plan available to the LEA, parents, and public.

18. Plan translated to the extent feasible, into any language that a significant percentage of the parents of participating students in the school speak as their primary language. Plan is subject to the school improvement provisions of Section 1116.

In addition, the school providing a schoolwide program must also evaluate its plan by reviewing, on an ongoing basis, the progress of all children. If necessary, the school must adjust its plan to provide additional assistance such as an extended school year, before and after school programs, summer programs, and training for teachers on how to identify students requiring additional assistance and how to implement student achievement standards in the classroom.

Two schools within the Social Circle City School System Title I schools conduct Schoolwide Programs. This allows all children and all parents an opportunity to have equal access to all related Title I assistance. Schoolwide Plans are updated and verified using a checklist during a school leadership meeting. Parents are also invited to participate in system and school level Parent Advisory Council meetings. All schools notify stakeholders in multiple ways; notice of the meeting dates placed on each school's marquee; in each school newsletter; on the web site. Parents and other stakeholders are to be notified by invitation (flyer) sent from each individual school and all stakeholders will be notified using each school phone messaging system. Parents that cannot attend the meeting will be given the opportunity to obtain a copy from each school and submit input before the final revisions are approved. Revision dates will be clearly marked on each plan. The system Family Engagement Coordinator will be responsible for collecting required documentation (agenda, meeting notes, and sign in sheets). At these meetings, parents and other stakeholders are given an opportunity to provide input on the Schoolwide Title I Plan, School Improvement Plan, Parent/Student/Teacher Compacts, Parent Involvement Plans, and the Comprehensive LEA Improvement Plan.

The DOE Checklist for Input provides guidance for determining compliance.

### **LEA Schoolwide Guidance**

On-site meetings are held with principals to discuss the current status of their plans in regard to checklist components. Missing or items in need of revision are noted and then rechecked when the revised plan is submitted. Copies of agendas and sign-in sheets from such meetings will be collected and stored in Title I files as evidence and documentation of meetings. As previously stated, system leaders support schools in developing, revising, implementing and coordinating school improvement and schoolwide plans during regularly scheduled administrative meetings. During the meetings, data is analyzed to identify and develop solutions to challenges related to

instructional strategies, parent engagement, professional learning, and budgets. The district also works with each school to provide schools with technical assistance on finalizing their plans.

### **Schoolwide Improvement Plan Development**

School Improvement Plans (Title I School-wide Plans), based on the needs assessment and the identified goals and strategies are required for each Title I school. In principals' meetings, the LEA provides guidance to schools about the development, implementation, and review of school-wide programs to assist the lowest-achieving students in meeting the state's high academic expectations. School-wide programs are not required to identify eligible students, as all pupils in the school may be served.

Principals are required to provide documentation of their schools' needs. This is provided by the annual needs assessments, the professional learning plan, and the data revealed from analysis of the Georgia Milestones Assessment System, ACCESS for ELLs, Georgia Alternate Assessment, and Georgia Kindergarten Inventory of Developing Skills as well as other local, state and national tests; Teacher and Leader Keys Effectiveness Systems reports; surveys; annual stakeholder surveys; demographic reports such as Student Record and FTE; and specific student needs (i.e., sub-groups as illustrated in the College and Career Ready Performance Index measures). Title I schools must develop plans for the areas in need of improvement and then align expenditures accordingly.

School Improvement and Schoolwide Plans are updated each spring for the following school year. School leadership teams conduct spring meetings at which representatives from various grade levels, content areas, and departments, as well as system and school administration and parents meet to develop a plan. During meetings, instructional strategies, parental involvement initiatives, and professional development activities are planned after a careful analysis of various data. Assistance is provided to schools in their use of funds to accomplish initiatives in their school improvement and schoolwide plans.

School administrators present their school plans as they work with other schools, system leaders, and parents to develop a system improvement plan. It is through this process that the LEA oversees the development of school improvement plans.

The following documentation will be maintained: meeting notices, letters/invitations to all parents, dated agendas, and sign-in sheets documenting stakeholder involvement in the development of the School-wide Plan. Suggestions for revision of the School-wide Plan (School Improvement Plan) may occur via feedback forms posted on the system website; parent conferences; and other announced stakeholder meetings. After revisions are made, parents are notified through subsequent meetings, parent conferences, and school newsletters that the plans can be accessed online, at the school, or a hard copy can be mailed to them upon request.

### **Evidence Based Practices and Interventions**

#### **Definition**

The term "evidence-based", when used with respect to a state, local educational agency, or school activity, means an activity, strategy, or intervention that

- demonstrates a statistically significant effect on improving student outcomes or other relevant outcomes based on:

- strong evidence from at least one well-designed and well-implemented experimental study;
- moderate evidence from at least one well-designed and well-implemented quasi-experimental study; or
- promising evidence from at least one well designed and well-implemented correlational study with statistical controls for selection bias; or
- demonstrates a rationale based on high quality research findings or positive evaluation that such activity, strategy, or intervention is likely to improve student outcomes or other relevant outcomes and includes ongoing efforts to examine the effects of such activity, strategy, or intervention

### **Implications**

During annual planning workshops, school level leadership identify and record the extent to which the activities, strategies, and/or interventions contained in their school improvement/schoolwide plans meet the various levels of qualifying as being evidence based: strong, moderate, promising, or otherwise provide a rationale for improving student outcomes.

### **Feedback on School Improvement Plans**

A minimum of two meetings are typically held in regard to the School Improvement Plans. These occur during the beginning of the year, in which all components of the program are discussed. Discussions in the first meeting include what is required for update and addition to the plans as related to the School-wide Program Checklist. These meetings are held with individual school personnel in the fall using the checklist as a guide. The second meeting is held during the second semester to determine the progress of each school in completing the School-wide Program Checklist. The completed checklist and the School-wide Plan are maintained in the school-level Title I files for review by the Title I director.

### **Resolution Procedures for Unapproved Schoolwide Improvement Plans**

Missing components or items in the School Improvement Plans (School-wide Plans) in need of revision are marked on the Georgia Department of Education (GaDOE) School-wide Program Checklist and then re-checked by the Title I director) when the revised plan is re-submitted by a designated due date .The school attaches to its School-wide Plan a copy of the completed, signed and dated checklist verified by the director. .An approved School Improvement Plan (School-Wide Plan) is required prior to the submission of expenditures within the school-level allocation. Technical assistance and support to schools is provided in the areas of the annual needs assessment, comprehensive planning, budgeting, implementation, and ongoing evaluation of each school-wide program.

### **Documentation**

Meeting notices, letters/invitations to all parents, dated agendas, and sign-in sheets documenting stakeholder involvement in the development of the School-wide Plan are to be maintained at the school level. Suggestions for revision of the School-wide Plan (School Improvement Plan) may occur via feedback forms posted on the system and/or school website; parent conferences; and other announced stakeholder meetings. After revisions are made, parents are notified through

subsequent meetings, parent conferences, websites, and/or school newsletters that the plans can be accessed online, at the school, or a hard copy can be mailed to them upon request.

Sign-in sheets and agendas are required and collected from meetings. Plans are presented, reviewed, and revised annually by parents, teachers, and administrators and tentatively approved at the central office by the Title I director each spring in anticipation of the new school year. Final edits occur in the fall following revisions made after a review by the director. The GaDOE School-wide Program Checklist is to be used to verify that the required components are included in each plan, which includes strategies for whole school reform. On-site meetings are held with principals to discuss the current status of their plans in regard to the checklist components.

### **CONSOLIDATION OF FUNDS**

The Social Circle City School System consolidates federal funds from Title IA and state funds..

### **TECHNICAL ASSISTANCE**

Schools are provided with technical assistance throughout the school year and by a variety of means which includes on-site visits, principal's meetings, phone calls, emails, etc. There is an open door/phone/e-mail type policy with the Federal Programs Director. In addition to the technical assistance listed above, Title I also provides guidance and technical assistance through the following means:

- July/August principals' meetings with all schools, which includes specific information for Title I principals
- Formal meetings held at the central office (Title I, administrative, principals, parents)
- Formal meetings held at the school site
- Informal meetings and conversations held before, during or after other administrative/principal, and other meetings held at the central office
- Informal meetings and conversations held before, during or after meetings held at Title I schools
- Parent and family engagement meetings/workshops/activities
- Phone calls to and from school personnel
- E-mails to and from school personnel
- Checklists
- Documentation files/notebooks listing required evidence
- Samples of required documents provided throughout the school year

### **MONITORING PROCESS for TITLE I, PART A**

Monitoring of all Title I schools is an ongoing process which includes:

#### **Planning/Data Review**

- Review of Title I Schoolwide Plans and CLIP
- Analyze results
- Plan for improvement

- Update plans with all required components
- Review collaboration expectations with other programs

### **Budget**

- A Resource Allocation Methodology/Plan (RAMP) for equitable allocation of funds to meet Supplement and Not Supplant regulations
- Establish budget priorities with principals and district office
- Determine set aside amounts
- Ensure local budgets are consistent with schoolwide plans
- Director of Support Services approves all purchase requests/orders
- Adhere to all local, state, and federal guidelines/policies

### **Professional Qualifications (in coordination with Title II)**

- Schools are informed of the PQ requirement
- Selection and hiring of PQ personnel reviewed with HR officer
- Confirmation of Title I paid personnel
- Paraprofessional and Paraprofessional Assurances (as applicable)
- Schedules documenting paraprofessional supervision by PQQ teacher (as applicable)

### **Document Review**

- Review components of schoolwide plans
- Budget updates
- Requirements for agendas, sign-in sheets, minutes
- Periodic Certification in December and May
- Time-logs for split funded personnel (as applicable)
- Inventory Requirements

### **Parent Engagement**

- Review of required documents and process for parent engagement
- Review revised Parent Engagement Plan and School Parent Compacts
- Annual Meeting
- Review purpose to increase parent engagement, to include non-English speaking parents, to support students academically
- Notification requirements: Parent Right to Know;
- Training/Workshops support core academics
- Evidence of parent feedback and input; surveys or meeting minutes

### **Reports**

- Discrepancies, error or omissions are addressed individually

### **Corrective Action**

- Areas of concern will be addressed with each principal or designee
- Guidance or Professional Development will be provided as needed or requested
- Results of TA will be reviewed during on-site visits to individual schools
- Dates for resubmission will be established

- Status of all corrective action plans will be tracked until verified
- Verification of corrective action plans will occur by review of requested documentation and/or by on-site visit depending upon the nature of the cited corrections.

Formal and informal meetings (on-site and system) as well as phone calls and e-mails provide technical assistance and monitoring feedback to the Title I administrators throughout the school year. The DSS (Title I Director) meets with the principal, Parent Engagement Coordinator (PEC) and bookkeeper when appropriate, to discuss Title I budget expenditures and other Title I requirements, specifically the Title I School-wide Plan and the school's Parent and Family Engagement Plan. The plans are reviewed using the Georgia Department of Education (GaDOE)'s School-wide Program and Parent and Family Engagement Checklists are provided to ensure all requirements are met. The DSS reviews the Title I School Budget and the Consolidated Application with each principal and bookkeeper, as needed. There is continuous feedback throughout the year between the DSS and school-level personnel through formal and informal (onsite and system) meetings, emails, phone calls, visits, and monthly principal's meetings to provide technical assistance and monitoring. At a minimum of once during the school year, a formal meeting is held on-site to review personnel expenditures and obligations through the end of the grant period as well as other object code expenditures.

If/When schools need to correct or re-submit an item, the DSS will visit the school, send a memo of correction, email the principal, or phone the principal describing the issue and how to effectively resolve the issue or problem, which must be re-submitted prior to obtaining the director's signature on the program checklists. Monthly payroll and budget status reports are reviewed by the DSS, and principals are contacted immediately to resolve variances. Title I personnel are required to acknowledge degree upgrades so that budgets will reflect the additional expense.

### **Collection of Required Documents**

A meeting is held at the beginning of the year to discuss the components of the program and the required documentation. Follow-up meetings, phone calls, and e-mails support the acquisition of required documents. All required documentation is provided to principals and/or the Parent Engagement Coordinator (PEC). Samples and forms, including semi-annual periodic certification forms, are provided by the Director of Support Services- DSS (Title I director) to school personnel who are required to provide documentation to the DSS (Title I director) as well as maintain a copy in their files. The documents are required to be submitted to the DSS at the end of the school year but may also be submitted on an ongoing basis.

## **TITLE I, PART A TARGETED ASSISTANCE SCHOOLS/PROGRAMS**

None of the Social Circle City School System schools are participating in a targeted assistance (TA) program. Should it be decided that schools eligible for targeted assistance will be served, the TA program will be implemented according to the appropriate TA guidelines.

## **COMMUNICATION WITH TITLE I PRINCIPALS and SCHOOLS**

Communications with principals and other school personnel occur through either large/small group Title I or administrative meetings, formal and informal individual meetings, e-mail, or by phone. Because of the size of the Social Circle City School System, the communication between the DSS and principals occurs frequently, and principals are encouraged to call or email directly any questions or concerns about budgets, procedures, or any other requirements of the federal programs administered by the district. Communication is two-way and schools do not hesitate to call if they have questions or concerns about budgets, procedures, or any other requirements of Title I and vice versa.

## **PRINCIPAL INVOLVEMENT**

Principals are involved in all aspects of the Title I program. They are invited to meetings, provided guidelines and expectations, and are requested to provide feedback on those as well as due dates and other general procedures. Principals are directly responsible for the presentation, review, and revision of their school's policies and procedures as related to the School Improvement Plan, Parent and Family Engagement Plan and activities, and the School-Parent Compact. Samples of required information are provided to principals (i.e., parents' right to know, school improvement notification, etc.) to utilize to suit their school's needs. Annually a meeting is held that reviews the purpose of all federal programs, as well as expectations and procedures related to allowable use of funds. Additional meetings are held to remind principals of end of the year information and to provide preliminary information related to the upcoming budget year. Documentation of professional learning sessions, technical assistance, and meetings is maintained by the appropriate federal program coordinator. Ongoing monitoring after training is conducted by the appropriate system federal programs coordinator to ensure compliance.

## **PROGRAM EVALUATION**

As part of the continuous improvement cycle, an annual Title I evaluation will be conducted by the identified stakeholders to determine the effectiveness of interventions and to plan for the subsequent year's program. Results of the program evaluation will be filed with the Title I director. The Superintendent's Advisory Council, consisting of parent and community representatives, will review the Parent and Family Engagement Policy; feedback from stakeholder surveys will be used by the district office to assess expenditures related to the required 1% Parent and Family Engagement set-aside. At the school and district level, a review of the College and Career Ready Performance Index and disaggregated results of standardized test scores will be conducted with identified stakeholder teams, including School Leadership Teams, School Councils, and district staff. A summary of the program evaluation will be included in each School-wide Plan.

The effectiveness of the Title I program is evaluated annually. The evaluation considers all aspects of the Title I program, including effectiveness of policies, involvement of

parent/guardians and impact of equitable services for private school children, if applicable. The following primary questions guide program evaluation: (1) What has worked well in the Title I program? (2) What has not worked well in the Title I program? (3) How should the Title I program be refined? The data are analyzed and the results of these analyses are used as the source of evidence to answer these questions.

1. Information is collected in the form of formative and summative student performance data; surveys; attendance data; and other data from students, teachers, and administrators. Additionally, a program evaluation survey is distributed to all Title I families in Title I schools. To the extent practicable, the survey is made available in multiple languages.
2. The data are analyzed by the Title I director with the assistance of other staff, as needed.
3. As necessary and appropriate, the results of the analysis are shared with the District Change Leadership (DCL) and District Change Team (DCT), principals, system administrators, parents, and other stakeholders to determine necessary and important changes that should be made to the Title I program to better serve its students.
4. The results of the evaluation, including information about any changes to the Title I program, are shared with district and school officials and distributed to all Title I families in Title I schools. To the extent practicable, the evaluation results are made available in multiple languages.

Sign-in sheets and agendas are required and collected. The GaDOE Program Evaluation form(s) will be used to verify that the required components are included.

[Checklist for Input](#)

[Assessing the Findings for the Annual Title I Parent and Family Engagement](#)

### **TITLE I BUDGETS**

Upon approval of the District Improvement Plan (DIP), principals are informed of their Title I allocation. School budget amounts are distributed to schools with specific requirements for expenditures for supplies, equipment, professional learning (if applicable), and parent and family engagement. When requests for expenditures are received, these are reviewed by the DSS for allowability. If changes or clarification are desired, the DSS either calls or submits changes by e-mail notification to the principal. The director reviews monthly status reports once budgets are received, reviewed, and approved at the local and state level. Once schools are notified that funds have been approved and may be expended, the schools submit requisitions and utilize the Social Circle City School System Internal Controls Process. The requisitions are cross-referenced with the budget entered in the Consolidated Application and the school-level allocation to ensure the accuracy. Budgets are reviewed and at least one formal meeting is held to review the budgets with the principals and the bookkeepers, if applicable, for each school.

**If applicable**, parents are given the opportunity to provide input about the use of the required 1% Parent and Family Engagement set-aside. The schools will provide evidence of this input through survey data, copies of dated meeting notices, agenda/minutes, sign-in sheets, comment cards, and/or letters to parents.

Once approved by the Georgia Department of Education (GaDOE), the CFO enters the federal budget in the accounting system (2 CFR §200.302(b)(3)). Each program director/coordinator verifies monthly detail reports the amount entered for each function, object, and facility, noting any discrepancies between the approved budgets and the accounting system.

**Schools may not requisition items until they have been notified that the budget(s) has been approved at the state level.** Once approval of the application has been made, schools are notified to spend the Title I budget and provide check dates to complete purchases (exceptions typically include expenditures for parent and family engagement and professional learning). Before making any purchases, schools must follow the Social Circle City School System Internal Controls Process located in this handbook.

Set aside funds are tracked through the identifier code 8010. Variances are investigated and resolved as soon as possible.

After funds are obligated, draw downs are requested at least monthly based on actual incurred rather than anticipated expenditures. The Social Circle City School System uses the GaDOE LUA Chart of Accounts and the Grants Accounting Online Reporting System (GAORS) to plan, budget, expend, and draw-down funds. School and system-level budgets are also built based upon the required set-asides and amounts for neglected students, private school participation, homeless, parent and family engagement, professional learning for teachers who do not meet professional qualifications, and the other general provisions as required (Flexible Learning Programs).

The DSS (Title I director) initiates budget amendments in the Consolidated Application when needed; similarly, the DSS is responsible for processing amendments automatically populated for carryover or reductions in allocations. As amendments are approved, revisions are made within the accounting system by the CFO. In coordination with the Business Department, the DSS reviews monthly budget status reports, the budget submitted through the Consolidated Application, draw-down reports and periodic payroll reports. These are used to monitor expenditures for all programs and to verify that the appropriate personnel are coded and paid from designated federal programs budget (2 CFR Part 200).

### **USE OF FUNDS**

The purpose of Title I funds is to enable schools to provide opportunities for at-risk and disadvantaged children to acquire the knowledge and skills contained in the challenging state content standards and to meet the challenging state performance standards developed for all children. The law provides many flexibilities and opportunities for local educational agencies (LEAs) and schools to meet the purposes of Title I. In schoolwide programs, an LEA may use Title I funds for any activities that are part of the schoolwide program plan and are evidence-based. Although a school may use Title I funds to serve all students in a schoolwide program, there must be protections to ensure that low-achieving students and historically underserved populations of students do not get ignored.

### **Examples of Uses of Funds in a Schoolwide Program (Based on the Needs Assessment)**

- Increased learning time
- High-quality preschool or full-day kindergarten
- Evidence-based strategies to accelerate the acquisition of content knowledge for English Learners
- Equipment, materials, and training needed to compile and analyze data to monitor progress, alert the school to struggling students, and drive decision making
- Devices and software for students to access digital learning materials and collaborate with peers, and related training for educators
- Instructional coaches to provide high-quality school-based professional development
- Evidence-based activities to prepare low-achieving students to participate successfully in advanced coursework
- School climate intervention, e.g., anti-bullying strategies, positive behavior interventions and supports
- Activities that have been shown to be effective at increasing family and community engagement in the school
- Family literacy programs

### **Examples of Title I Unallowable Expenditures**

The following are examples of unallowable expenditures and CANNOT be included in the Title I school budget. Monies spent on any unallowable items must be removed from the Title I budget.

- School resource officer, security guard (exceptions may be allowable for specific Title I events conducted outside normal school hours)
- Clinic aide, school nurse, clinic supplies
- Custodian, custodial supplies (exceptions may be allowable for specific Title I events conducted outside normal school hours)
- Cafeteria worker, cafeteria supplies
- ELL coordinators, ELL required forms and tests
- Behavioral intervention positions must be addressed in the Title I schools' SWP plans with supporting needs assessment documentation
- Incentives, rewards, certificates, door prizes, raffle items, etc.
- Marketing items such as brochures, banners, and flags (unless Title I Reward Schools, National Title I Distinguished Schools or Reward District)
- Memberships for professional organizations not related to Title I
- Field trips (all field trips must receive prior approval from the Department)
- Food items (unless light snacks purchased for parent trainings)
- Guidance counselors, unless the position is beyond district allocation, are allowable if 100-percent of their time is spent working on Title I related guidance/academic issues

Items purchased through Title I must be permanently marked with Title I and the fiscal year the items were purchased. The DSS monitors the expenditures by signing off on requisitions, which must be for the items requested on the budget worksheet. Expenditures are also monitored through monthly budget status reports.

Internal Control Procedures for Title I- Cash Management

Cash management internal controls represent an application of common sense and prudent conduct to the use and proper safeguarding of district assets. Proper internal control mechanisms provide management with a reasonable assurance that intended safeguards are being practiced consistently. Therefore, the integrity of any cash management activity depends on the application of internal control principles and standards. The following identifies the monitoring and reimbursements.

Procedures	Person Responsible	Timeline
<p>The system's CFO ensures procedures are followed to adequately handle the cash management of the Title I funds.</p> <p>The CFO makes sure that all appropriate information concerning the program's expenditures is obtained before completing a request for funds from GaDOE.</p>	CFO Federal Programs Director	ongoing
<p>The CFO reviews the expenditures incurred and the forecasted expenditures then compares them to the cash on hand for the Title I programs. The he/she determines the amount of the drawdown needed from GaDOE.</p> <p>CFO reviews and submits the request for funds from GaDOE via the Grants Accounting Online Reporting System.</p>	CFO Federal Programs Director	ongoing
<p>The CFO ensures that cash related transactions occur only after the approval of an individual with delegated authority to make approvals. Cash related transactions are being fully documented so that an undisputable audit trail exists. Cash related transactions are recorded promptly during each step of the cash handling function.</p> <p>Reimbursements are made only after the costs have been incurred with the proper documentations and approval signatures.</p>	CFO Federal Programs Director	ongoing
<p>Provisions are made for the regular review and comparison of transaction documentation to detect errors and duplicate payments.</p>	CFO Federal Programs Director	ongoing

Cash related duties, such as maintenance of accounts receivable, cashiering, accounting, disbursing, and collecting funds are segregated. Also cash related accounts are frequently reviewed and reconciled with subsidiary records.	CFO Federal Programs Director	ongoing
--	--	---------

### **ACADEMIC ACHIEVEMENT AWARDS PROGRAMS**

Academic Achievement Awards Program Schools are selected for the program based on the reward status as defined by the US Department of Education. Two categories of Reward Schools are eligible to be included receive awards:

1. Highest-Performing Reward School –a Title I school among the Title I schools in the State that have the highest absolute performance over a number of years for the All Students group and for all subgroups based on statewide assessments, and, at the high school level, is also among the Title I schools with the highest graduation rates. A school may not be classified as a Highest-Performing School if there are significant achievement gaps across subgroups that are not closing in the school; or
2. High-Progress Reward School – a Title I school among the ten percent of Title I schools in the State that are making the most progress in improving the performance of the ALL Students group over a number of years on the statewide assessments, and at the high school level, is also among the Title I schools in the State that are making the most progress in increasing graduation rates. A school may not be classified as a High-Progress school if there are significant achievement gaps across subgroups that are not closing in the school.

Reward Schools are required to complete a narrative and attach it narrative to the consolidated application when submitting budgets. Schools must provide a narrative description that summarizes the activities and materials to be funded using the Title I, Part A Reward Schools Award of the Title I, Part A Reward District Award for each school in the LEA or LEA receiving an award. The summary must delineate the decision making process utilized at each Reward School in the LEA or Reward District for determining the expenditure of the Title I, Part A Reward Schools and Reward Districts Award funds. Please include a listing of the staff with job titles involved in the decision making process.

- What processes and procedures does the school / LEA have in place to monitor the use of Title I, Part A Reward Schools / Districts Awards monies?
- What internal controls does the school / LEA have in place to promote efficiency of implementing the plans for this award, assure appropriate use and expenditure of Academic Achievement funds, and to safeguard assets and / or fraud and error? Schools receiving monetary awards must use funds for educational purposes only:
- Resources / instructional materials
- Monetary awards for current year employees
- Schoolwide projects; such as computer labs, materials and supplies for the media center, science labs Expenditure of funds must be allowable and reasonable in accordance with OMB Circular A-87 and EDGAR 74.36.

## **SECTION 10**

### **TITLE I, PART A SCHOOL IMPROVEMENT GRANT 1003(a) (84.010)**

An amendment to Georgia's ESEA Flexibility Waiver, approved in June 2015, modified the formula for identifying Priority, Focus, and Reward Schools. Social Circle City Schools, under these revised guidelines, does not currently have any Priority or Focus Schools and does not receive the School Improvement Grant 1003(a). Should SCCS have any identified Priority or Focus Schools, the Director of Support Services (Title I director) will provide written guidance and technical support to the schools in developing, revising, implementing and coordinating the School Improvement Plan through monthly principals' meetings, emails, and frequent phone calls. The LEA supports the schools in the development of their School Improvement Plans to include analyzing data to identify and develop potential obstacles and solutions to ensure an optimal learning environment for all students.

In the identified schools, Flexible Learning Programs will be designed in concert with parents and implemented to supplement instruction. Notifications will be sent to all parents of students at the identified Priority and/or Focus Schools, inviting them to apply for FLP services. From those who apply, students will be selected to participate in federal rank order as follows:

- *Rank Order I:* Students with disabilities, English learners, or free or reduced priced meal pupils who are not meeting state standards as identified by state assessment results; and if funding levels allow,
- *Rank Order II:* All other students not meeting state standards as identified by state assessment results; and if funding levels allow,
- *Rank Order III:* Students who are meeting standards as identified by state assessment results.

The Title I Director will meet with the administrators of each identified Priority and/or Focus School to analyze and revise the School Improvement Grant budget and Justification of Expenditures for the Consolidated Application. The LEA and each school work together to ensure all professional learning activities are sustained, data-driven, and focused on student instructional needs. The LEA utilizes the same internal controls to ensure all expenditures are in alignment with the School Improvement Plan and the budget entered into the Consolidated Application.

## **SECTION 11**

### **SCHOOL IMPROVEMENT 1003(g) SIG (84.377)**

No Social Circle City Schools have been identified as SIG 1003(g). Schools which meet the requirements of being identified as Priority Schools will follow all state and federal guidelines and procedures.

## **SECTION 12**

### **SERVICES for HOMELESS CHILDREN and YOUTH**

The Social Circle City School System Director of Student Services serves as the homeless liaison and meets with school personnel to discuss the requirements of the McKinney-Vento Homeless Education Act. Among the topics discussed are the transportation requirement for schools of origin and the definition of and services for students identified as homeless. The Director of Student Services supervises and works very closely with the school guidance counselors and Communities in Schools to ensure students receive the services they need. Homeless liaison contact information is provided during enrollment also provided at the Annual Title I Meetings, and school or guidance offices. Local board policy JBC(1) details the identification, enrollment, and service procedures for homeless students. Upon identification, homeless students are eligible for free and reduced priced meals, Title I services, and enrollment in the applicable gifted, special education, CTAE, remedial, and general education courses. Transcripts are evaluated by school counselors for students in grades 9-12 to ensure pupils are scheduled into the next appropriate course needed for graduation. In all grades, grades from accredited institutions are accepted without validation, and a homeless student's course of study is continued without disruption. The director of curriculum and instruction will be consulted in instances in which scheduling must be adjusted to enable a homeless pupil transferring into the system the opportunity to earn partial or pro-rated credit. The district submits, through the Consolidated Application and Student Record, information about the number of homeless children and reports educational and related support needs through an annual survey in the MyGaDOE portal.

Method #1: Identify Homeless Students' Needs and Fund Accordingly The best way to determine the set-aside is to conduct an assessment of the number and needs of homeless children and youth residing in the local educational agency (LEA) and determine how much it costs to pay for the services that homeless children need and reserve that amount of Title I, Part A funds to pay for them. To make this determination, the LEA should look at how much it cost the previous year to have the Homeless Liaison fulfill the requirements set out in Section 722(g)(6) of the McKinney-Vento Homeless Assistance Act. In addition to coordinating the identification and school enrollment of homeless children, this provision of the law requires liaisons to inform parents of homeless children about "educational and related opportunities available to their children," assist parents of homeless children in accessing school transportation, and provide public notice of the educational rights of homeless children at places like soup kitchens and family shelters. Based on the previous year's cost data, the LEA can allocate the Title I, Part A set-aside, taking into account any anticipated changes in the population and/or of homeless students.

### **SECTION 13**

#### **SERVICES FOR NEGLECTED and DELINQUENT CHILDREN**

There are no neglected and delinquent facilities located within the Social Circle City School System's geographic boundaries. The reservation amount provided by GaDOE in the Title I, Part A allocation letter and worksheet is the amount set aside for neglected or delinquent children. The Annual Survey of Local Institutions for Neglected or Delinquent Children is completed each year and is based on the number of children residing at the home for 30 consecutive days, with at least one day being in October.

### **SECTION 14**

#### **PRE-KINDERGARTEN PROGRAMS**

There are no Title I-funded pre-kindergarten programs in the Social Circle City School System.

### **SECTION 15**

#### **CHARTER SCHOOLS**

There are no charter schools in the Social Circle City School System; however, should a charter school open in SCCS and qualify for services/resources, planning would occur via discussions with representatives from the charter school. The charter school would be required to submit a plan describing how the funds will be used to support instruction and ensure that all students meet high academic achievement and performance standards. Federal programs directors will approve the charter school's plan and maintain the plan and any documentation of the planning process as well as any documentation needed for audit purposes. Like private school consultations, the charter schools will be notified regarding the federal funds available and the other provisions of ESSA governing Title schools such as professional qualifications of teachers and paraprofessionals, choice and supplemental educational services, and unsafe schools.

### **SECTION 16**

#### **TITLE I, PART C MIGRANT EDUCATION PROGRAM SERVICES**

Potential migrant students are identified through the GaDOE Parent Occupational Survey, which is a portion of the annual student back-to-school enrollment packet for all returning students and in the enrollment packet for all new students. Surveys which meet the indicators for possible migrant services are forwarded to the Migrant Education Program (MEP) specialist at Abraham Baldwin Agricultural College. SCCS is notified monthly via the MyGaDOE portal of any new migrant students approved by the MEP office, new migrant students are coded in the Student Information System, and the school nutrition director alerted, as these students are eligible for free/reduced meal services. Upon this notification, the director of curriculum and instruction (Title I-C contact) accesses the Migrant Student Information Exchange (MSIX) to obtain any educational or health records.

There are currently no students or out-of-school youth (OSY) identified as migrant in the system. When migrant students are identified, a Comprehensive Needs Assessment and delivery plan are developed in conjunction with the MEP specialist at Abraham Baldwin Agricultural College (ABAC), which serves as the MEP Consortium fiscal agent.

Upon enrollment, students are administered a universal screener in reading and math. Migrant students participate in all LEA services based on a review of academic records, current assessments and program eligibility. A family interview, conducted upon registration, determines needs. Such services may include after-school tutoring to assist them with homework, understanding the English language, and providing materials for English language acquisition. Using the Priority for Services (PFS) form provided by the ABAC office and local assessments, the district designs services that include EIP/REP, gifted, and CTAE courses that meet student needs. In addition, the LEA coordinates after-school tutoring and/or summer instruction if needed with the MEP consortium. The district makes parents aware of these opportunities, and all migrant students in Title I schools participate in school-wide programs. The MEP consortium recruits OSY for services that may include GED preparation. The district notifies the consortium contact if aware of any OSY and pre-school students.

## **SECTION 17**

### **FOSTER CARE TRANSPORTATION PLAN**

In order to expedite the enrollment and continuous service to children in foster care, a foster care transportation plan has been developed with input from the Department of Children and Family Services (DFCS) and representatives of the Social Circle City School System. The SCCS Director of Student Services will serve as the point of contact who coordinates with local DFCS. This individual will assume responsibility for streamlined communication and collaboration with DFCS case managers and education support monitor (DFCS POC). Such collaboration will ensure the smooth implementation of provisions outlined in ESSA to include: thoughtful Best Interest Determinations (BID); appropriate and timely transportation plans for those children placed out of the zone of their school of origin; and, immediate enrollment and records transfer. In addition, the LEA POC will facilitate training for LEA staff with regards to the unique challenges of children in foster care; ensure monitoring of attendance and progress of foster children enrolled in LEA; and, ensure effective and confidential data collection and sharing.

Real time coordination will occur between case managers (CM), education support monitor (ESM-DFCS POC), homeless liaison (HL- LEA POC), foster parents (FP), and court-appointed special advocates (CASA) when applicable, regarding foster children entering and exiting care; changing placements; enrollment and withdrawal; and making best interest determinations. When transportation is an issue, those parties will collaborate to develop a transportation plan that meets the needs of the individual child. “No cost plans” will be explored first and may include the following:

1. Foster parent transports child to school of origin (SOO) (within 25 miles round trip); or
2. Foster parent transports child to nearest school transportation pick up location; or
3. LEA will follow the existing plan for transporting children with disabilities when the foster child is disabled.

In the event that the above options are not feasible and additional costs are incurred, SCCS and DFCS will share transportation costs:

- Default to predetermined LEA responsibility for costs incurred as the result of re-routing of county buses while DFCS will assume responsibility for costs associated with reimbursing Foster Parents or contracting with transportation companies.
- Initial transportation planning will occur at the lowest level between CM, (DFCS, POC), and SW (LEA POC). Foster Parents and CASA will be included as appropriate. Disputes will be forwarded to the Superintendent and DFCS Director for resolution.
- Final determination of how to pay for additional transportation costs will be made by the LEAs Transportation Director.
- Daily attendance will not be impacted by transportation disputes between SCCS and DFCS. SCCS will provide or arrange for transportation to and from school of origin during the dispute process.

In the event that additional transportation costs are unavoidable, SCCS and DFCS will share transportation costs. The DFCS will assume financial responsibility for extraordinary costs such as contracting with transportation companies or paying foster parents to transport farther than 25 miles.

Final determination of how to pay for additional transportation costs will be made by LEA superintendent with input from the LEA Title I director and Director of Student Services. In accordance with ESEA section 1112(c)(5)(B)(i), LEA will provide or arrange for adequate and appropriate transportation to and from the child's school of origin during the dispute resolution process. SCCS will assume financial responsibility for costs associated with re-routing LEA transportation.

## **SECTION 18**

### **Title II, Part A: Improving Teacher Quality**

#### **NEEDS ASSESSMENT and EQUITY ACTION PLAN**

The Social Circle City School District completes an annual Comprehensive Needs Assessment(ESEA Sec. 2122(c)(1), Sec. 2122(b)(7), Sec. 2122(c)(2)) that addresses each of the following areas:

- *Professional Learning*
  - o Student Supports and Interventions
  - o Teacher Development
  - o Leader Development
  - o Professional Growth
  
- *Personnel*
  - o Recruitment
  - o Retention

- o Effectiveness
  - *Factors Affecting the Learning and Work Environments*
    - o Climate
    - o Support Programs & Interventions
  - *Title II, Part A Administration*
    - o Prioritizing Funds
    - o Needs Assessment/Consultation
    - o Internal Controls

All required components are addressed and all required stakeholders are invited to participate in some portion of the needs assessment process. The Title II, Part A director reviews annual guidance to determine what must be addressed. Supporting documentation is kept on file by the Title II, Part A director for each required component in support of the data summary and needs analysis provided. These data are gathered, reviewed and used to determine the needs that will be reported in the CLIP components and Equity Action Plan, which will guide the selection of strategies to be included in the budget.

In the spring, the Title II, Part A director works with required stakeholders to determine equity gaps and draft the annual LEA Equity Action Plan in accordance with SEA requirements. The Equity Action Plan is monitored by the Title II director throughout the year, and all activities must be allowable and aligned with the initiatives included in the plan. Documentation of approved activities supporting the Equity Action Plan initiatives is maintained at the central office by the Title II director (ESSA Sec. 1111(g)(1)(B), 1112(b)(2), 2101(d)(2)(E), 2103(b)(3)(B)).

### **PROFESSIONAL LEARNING**

The district coordinates federal, state, and local professional learning funds and reviews proposed activities as part of the development of the CLIP components. Certified employees are required to participate in high quality professional learning each year. Annually, principals verify/confirm each teacher's effectiveness in meeting the needs of diverse learners and that the teacher has participated in high-quality professional learning. Social Circle City Schools maintains 100% participation for all actively employed certified teachers. Using the Georgia Teacher Keys Effectiveness platform, each teacher identifies a professional learning goal and approved professional learning opportunities. Additionally, requests for professional learning expenditures (conferences, books, seminars) are evaluated by the central office for alignment with the district improvement plan. System leaders and teachers generate professional learning opportunities that are derived from needs assessment data, and proposed funding sources.

All Social Circle City Schools professional learning activities will be based on a review of evidence-based research with the focus on increasing student achievement. Research or effectiveness data is maintained to support the activities selected at the school-level, while the Title II director reviews district-level activities. The district uses Teacher and Leader Effectiveness Measures, coupled with student achievement data, to schedule system- and

school-level professional learning activities to meet identified needs. The purpose of professional learning is to enable teachers to become or continue to be highly effective and successful classroom teachers. Professional learning activities funded with Title II, Part A must support the district's Effectiveness Plan, which is submitted with the Title II annual budget.

### **TITLE II-A FUNDED ACTIVITIES and EFFECTIVENESS EVALUATION**

The Title II, Part A director will draft the annual Effectiveness Plan based on the DIP/CLIP and current planned budget expenditures in accordance with SEA requirements. The Effectiveness Plan is revised and uploaded if a budget amendment is submitted due to a change in needs and/or a significant change in budgeted strategies. Effectiveness of federally funded activities is evaluated annually using available student achievement results, process data, and stakeholder perception data (ESEA Sec. 2101(2), Sec. 2122(b)(2); 2 CFR 2 CFR §200.328(a)). Historical and longitudinal data are reported and compared to evaluate the impact of interventions. Artifacts and evidence of implementation are collected from schools as part of the ongoing monitoring process. This summary of program effectiveness is included in the subsequent year's Comprehensive Needs Assessment and is used to guide the development of the following year's program.

### **INTERNAL CONTROLS**

All written internal controls, procurement standards, and inventory/property management outlined in Section \_\_ of this handbook apply for Title II as well. The supplement not supplant test resides at the expenditure level for Title II.

### **PARENTS' RIGHT TO KNOW TEACHER AND PARAPROFESSIONAL QUALIFICATIONS**

Parents are informed of their right to know the qualifications of their children's teacher and paraprofessionals. This information is made available through a variety of means, including: notification letter, student handbook, website, and other newsletters sent home with students. All notices and information required must be in a uniform and understandable format, including alternative formats upon request and, to the extent practicable, in a language that parents understand. Parents may request and receive information regarding:

- Whether the student's teacher—
    - o has met State qualification and licensing criteria for the grade levels and subject areas in which the teacher provides instruction;
    - o is teaching under emergency or other provisional status through which State qualification or licensing criteria have been waived; and
    - o is teaching in the field of discipline of the certification of the teacher.
- Whether the child is provided services by paraprofessionals and, if so, their qualifications.

Principals are required to notify in writing the parents of those students who are taught four or more weeks (20 or more consecutive school days) by a teacher who does not meet professional qualifications. Copies of these communications are forwarded to the HR Director for

documentation. Questions regarding professional qualifications are submitted to the Title II, Part A area specialist by the Title II, Part A director.

### **NON-PROFESSIONALLY QUALIFIED TEACHERS AND PARAPROFESSIONALS**

If the Social Circle City School District employs on a full-time basis a non-PQ teacher or paraprofessional, a written plan will be developed within the Teacher Keys Effectiveness System. Each plan will contain documentation of progress made by the teacher and/or paraprofessional in meeting the requirements outlined in the plan. The plan will be written with input from the teacher/paraprofessional, principal, and Department of Human Resources and will be monitored by the principal and the Department of Human Resources.

Any teacher who does not hold a clear renewable (standard professional) certificate will have a written plan in the Teacher Leader Effectiveness System. Documentation of progress will be kept in the TKES platform regarding meeting the requirements outlined in the plan. The plan will be developed with input from the teacher, principal, and Department of Human Resources and will be monitored by the principal and the Department of Human Resources.

Teachers serving in an alternative setting must meet the professionally qualified requirements outlined in the Every Student Succeeds Act if they are the teachers of record. When the consultative method is applied, schools document ongoing substantial, meaningful collaboration with a professionally qualified teacher. Documentation is maintained at the school by the principal.

### **TRAINING OF PRINCIPALS**

The Social Circle City School District will train principals annually on the professional qualifications requirements for the hiring and placement of teachers and paraprofessionals. Such training will be documented with sign-in sheets and agendas and will utilize the GaDOE-produced materials.

### **INSTRUCTIONAL PARAPROFESSIONALS**

Paraprofessionals paid with federal funds must be assigned duties that are instructional in nature only and must be under the direct supervision of a professionally qualified teacher. Currently, no paraprofessionals are paid through Title II-A funding. In addition, all principals will provide training regarding the duties and assignments of paraprofessionals.

### **PRIVATE SCHOOLS**

There is one private school located within the geographic boundaries of the Social Circle City Schools District. Social Circle City Schools and the Title II-A program adhere to procedures outlined in the Private Schools section of this handbook. Copies of private school letters, mail receipts, agendas, sign –in sheets and affirmation of schools declining consultation are all maintained on file.

## **SECTION 19**

### **TITLE III: LANGUAGE INSTRUCTION FOR ENGLISH LEARNERS and IMMIGRANT STUDENTS**

SCCS receives funds to assist English Learners through the state's Title III Consortium. Funds from the Consortium are used to supplement the state funded ESOL program and can be requested to provide additional services that improve the English language proficiency and academic achievement of English learners (ELs) through the provision of language support programs, activities to increase the knowledge and skills of teachers who serve ELs, and outreach toward EL families, parents and the community. All services provided ELs through Title III funds must supplement, and not supplant, the services that must be provided to ELs under Title VI of the Civil Rights Act of 1964 (Title VI), the Equal Educational Opportunities Act of 1974 (EEOA), and other requirements, including those under State or local laws.<sup>2</sup>

ESOL and Title III hold students accountable for progress in, and attainment of, English language proficiency. Upon attainment of English language proficiency, students exit from supplemental language services as outlined in the TITLE III and **ENGLISH TO SPEAKERS OF OTHER LANGUAGES HANDBOOK for Social Circle City Schools.**

General Title III requirements of all LEAs include:

- Adherence to standardized, statewide ESOL entrance and exit procedures
- Screening of all potential ELs within 30 days of enrollment in a school
- Compliance with Title I requirement to test 100% of ELs on the ACCESS for ELLs assessment
- Using Title III funds in ways that build capacity to support ongoing EL content area achievement
- LEA certification that all teachers in a Title III-funded language instructional program/activity are fluent in written and oral English and any other language that may be used for instruction.
- Assurance that the LEA is complying with the Title I parent notification of services requirement.
- Selection of one or more methods or forms of effective instruction to be used in the supplemental programs and activities provided to assist ELs in reaching English proficiency and meeting content standards
  - Provide effective, supplemental language programs that demonstrate success in increasing ELs' English proficiency and content achievement
- Provide effective professional development (PD) for teachers, administrators and other school personnel. This PD must fulfill 4 requirements. It must:
  1. Be designed to improve the instruction and assessment of ELs; and
  2. Be designed to enhance participants' ability to understand and implement curricula, assessment practices and instructional strategies for ELs; and

3. Prove effective in increasing ELs' English proficiency or substantially increasing participants' subject matter knowledge, teaching knowledge or teaching skills; and
  4. Be of sufficient intensity and duration to have a positive and lasting impact on teachers' performance in the classroom.
- Provide and implement parent, family and community engagement activities that enhance or supplement the Title III-funded language activities/programs. This may include strategies that serve to coordinate and align related programs (such as Georgia's Title I Parent-School Partnership programs).

**SCCS does not qualify for Immigrant funds due to low incidence of immigrant families.** Any student enrolling to SCCS who was born outside of the United States or Puerto Rico and has been enrolled in US schools less than 36 consecutive months, is to be identified as an immigrant student.

SCCS registration form Section 8 requires parents to complete the following:

- Country of birth
- Date first entered US
- Date first entered a US school (k-12)
- If country is outside of the US, has student enrolled in US schools for less than 36 cumulative months (yes or no)
- Has student attended school(s) outside of the US (other than DOD schools) since first time entering into a US school (yes or no).

Student immigrant information is to be coded in SIS (Infinite Campus) under Census-People-Demographics.

The following three questions included on the system enrollment form and are embedded in the enrollment process for all students:

1. Which language does your child best understand and speak?
2. Which language does your child most frequently speak at home?
3. Which language do adults in your home most frequently use when speaking with your child?

Social Circle City Schools also includes an additional question:

4. If possible, would you prefer notice of school activities in a language other than English? If yes, which language?

Students answering "English" to all three questions will be classified as native English-speaking; such students are not eligible for ESOL instruction.

Students providing an answer other than "English" to any of the three questions will be referred to the system ESOL/Title III Coordinator as well the school's assigned ESOL teacher who will conduct the appropriate WIDA screening. The ESOL teacher needs a copy of the Student's Registration form for documentation of the Home Language Survey and access to any student records from the student's last school.

**Title III law requires that students be screened for eligibility within 30 days of enrollment.** SCCS is required to send notification, in a language and format appropriate for the reader, to parents of ELs who have been selected to participate in the LEA's Title III or Title I supplemental language program. This notice, distributed within the first 30 days of enrollment or identification for a supplemental language program, also permits the parent to waive participation in the Title-funded services.

Students identified as ESOL are flagged in the SIS (IC).

The system Title III Coordinator administers the program and manages its budget. All purchases follow internal controls and inventory guidelines outlined.

### **Private Schools**

Title III of the ESEA allocates funds to LEAs that may be used to provide services and materials for limited English proficient students (LEP) and immigrant students enrolled in nonpublic schools. The number of Title III-eligible private school students is annually reported in Student Record by LEAs and these private school English Learner counts are included in the annual Title III district allocations. LEAs must ensure that Title III funds expended on nonpublic school services are done so in accordance with federal regulations and for the purpose of providing high-quality professional development and assisting LEP students achieve English proficiency and meet academic standards.

LEAs receiving Title III funds must annually provide private schools located in the geographic area served by the LEA with a timely and meaningful opportunity to participate in educational services intended for LEP children and educational personnel. To ensure this timely and meaningful consultation, the LEA must consult with appropriate private school officials during the design and development of the Title III program on issues such as:

1. How the LEP student's needs will be identified
2. What services will be offered
3. How, where and by whom the services will be provided
4. How the services will be assessed and how the results of the assessment will be used to improve those services
5. The size and scope of the services to be provided to the private school children and educational personnel
6. The amount of funds available for those services
7. How and when SCCS will make decisions about the delivery of services, including a thorough consideration of the views of the private school officials on the provision of contract services through potential third-party providers.

**At this time, there are no private school in the geographic boundaries of SCCS which have indicated interest in participating in Title III.** At such time a private school wishes to participate, SCCS will follow all regulations and guidelines as outlined in the Title III Federal Program Guidance for Private Schools.

As a member of the Title III Consortium, SCCS will adhere to procedures as outlined in the document for requesting of funds.

[Title III Consortium Request Procedures 2017-2018](#)

The request for funds form is found on the following link: [Title III Program Management Guidance](#)

Previously stated in both Title I and Title III under the Elementary and Secondary Education Act (ESEA), the overarching parent and family engagement law regarding notices to parents of English Learners (ELs) receiving supplemental language support is now under Title I, Part A, Section 1112(e)(3) in the Every Student Succeeds Act (ESSA). SCCS is required to send notification, in a language and format appropriate for the reader, to parents of ELs who have been selected to participate in Title III or Title I supplemental language program. This notice also permits the parent to waive participation in the Title-funded services.

[Title I or Title III Supplemental Language Programs Translated Forms](#)

## **SECTION 20**

### **TITLE IV, PART A: STUDENT SUPPORT and ACADEMIC ENRICHMENT**

The Social Circle City Schools District receives funds to support academic enrichment, safe and healthy schools, and technology through Title IV, Part A. The system Title IV, Part A director administers this program and manages the budget. The budget is allocated for well-rounded educational opportunities, support of safe and healthy schools and effective use of technology. Expenditures match priorities in the comprehensive needs assessment and district improvement plan. All requests for purchases follow internal controls and inventory guidelines outlined in Section 12. The supplement versus supplant test resides at the expenditure level for Title IV, Part A. There is one private school within the geographic boundaries of Social Circle City Schools. The Title IV-A program adheres to procedures outlined in the Private Schools section of this handbook. Copies of private school letters, mail receipts, agendas, sign –in sheets and affirmation of schools declining consultation are all maintained on file. SCCS transfers all Title IV, Part A funds into Title II, Part A.

## **SECTION 21**

### **TITLE V, PART B: RURAL EDUCATION INITIATIVE**

#### **Title V, Part B – Rural Education Initiative**

##### **Purpose**

The Rural Education Initiative is designed to assist rural school districts in using federal resources more effectively to improve the quality of instruction and student academic achievement. Title V, Part B funds must supplement other local, state, and federal dollars. Title V, Part B provides resources above all other resources.

##### **Use of Funds**

An eligible LEA may use Title V-B funds for activities authorized under:

- Title I, Part A (Improving the Academic Achievement of the Disadvantaged)
- Title II, Part A (Supporting Effective Instruction)
- Title III, Part A (English Language Acquisition, Language Enhancement and Academic Achievement Act)
- Title IV, Part A (Student Support and Academic Enrichment Grants)
- Parental Involvement Activities

## **SECTION 22 IDEA**

Social Circle City School System receives IDEA funds to provide services to students with exceptionalities and expended under the supervision of the Special Education Director (IDEA director). The Consolidated Application is the mechanism for budgeting IDEA funds, which are used to employ teachers and paraprofessionals, to purchase equipment, and to provide professional learning for staff members working with special education pupils. Semi-annual periodic certifications are maintained on all IDEA funded employees, and all requests for purchases follow internal control and inventory guidelines outlined in Section 12.

**SEE [Special Education Handbook](#)**

## **CARL D. PERKINS VOCATIONAL and APPLIED TECHNOLOGY ACT**

The Social Circle City School System does receive Perkins funds used for the purchase of equipment and supplies as well as to provide professional learning for Career, Technical, and Agricultural Education (CTAE) teachers in grades 6-12. The Consolidated Application is the mechanism for budgeting Perkins funds, and all requests for purchases follow internal controls and inventory guidelines outlined in Section 12.

After funds are obligated, draw downs are requested no more than once per month based on actual incurred rather than anticipated expenditures. The CTAE director verifies expenditures as allowable and signs the drawdown report. Discrepancies are reported by the CTAE director on the drawdown report and corrected prior to requesting funds from the GaDOE.

An annual physical inventory of equipment purchased with Perkins funds is conducted, with a hard copy maintained by the CTAE director. An electronic inventory record is updated with each purchase, with all items labeled with the source of purchase. An inventory list is kept at the school-level and contains the following elements: a description of the property, serial/identification number, source of funding (including the FAIN), who holds title, acquisition date/date of purchase, cost of property, percentage of federal participation if costs were shared, vendor name, school, equipment location, use/purpose, and current condition.

## **SECTION 23: COMPLAINT PROCEDURES**

The Social Circle City School System has a complaint and grievances procedures disseminated annually. Complaint procedures are described in handbooks and on the district website. Parents are expected to address complaints or grievances beginning at the school level with the teacher first and then the administration. Central office personnel should be contacted next, should

parents feel the issues have not been resolved. If still unsatisfied, the superintendent's office should be contacted. Conferences forms/notes/minutes are kept on file as documentation of the issues.

Any complaints issued as a result of federal programming, including Title I, Part A (Disadvantaged Children), Title I, Part C (Migrant Education Program), Title I, Part D (Neglected and Delinquent), Title II, Part A (Teacher and Leader Quality), Title III and English to Speakers of Other Languages (ESOL), and Title X, Part C (McKinney-Vento Education for Homeless) must be filed according to the system complaint procedures policy which is made available to all parents and employees. A form for documenting complaints is located on the system website. Upon receipt, these forms are maintained at the central office, where the offices of federal programs record the date the complaint was received, the name of the person receiving the complaint, the complainant's name, the person to whom the complaint was assigned, the nature of the complaint, the resolution, and the date of resolution. The complaint procedures describe grounds for complaints, federal programs for which complaints can be filed, filing and investigation of a complaint as well as rights to appeal to the Georgia Department of Education (GaDOE). The complaint procedure is distributed at the back-to-school meeting for all staff, on the system website, and presented by each school at the Annual Title I Meeting.

### **Social Circle City Schools Federal Programs Complaint Procedures**

**Responsible:** Federal Program Director & Principals

Every effort is made to resolve issues and answer inquiries at the most direct and immediate level. This resolution process is facilitated by regular contact between system staff and participating school representatives. If an issue cannot be satisfactorily resolved in this manner, a formal complaint may be initiated.

Parents are expected to address complaints or grievances beginning at the school level with the teacher first and then the administration. Program directors should be contacted next should parents feel the issues have not been resolved. If still unsatisfied, the superintendent should be contacted. Conferences forms/notes/minutes are kept on file as documentation of the issues.

Any individual, organization or agency ("complainant") may file a complaint with the Social Circle City School System (SCCS) if that individual, organization or agency believes and alleges that the SCCS is violating a Federal statute or regulation. The complaint must allege a violation that occurred not more than one (1) year prior to the date that the complaint is received, unless a longer period is reasonable because the violation is considered systemic or ongoing. A complaint should not be filed with the Georgia Department of Education until every effort has been made to resolve through local written complaint procedures. If the complainant has tried to file a complaint with Social Circle City Schools to no avail, the complainant must provide the Georgia Department of Education written proof of their attempt to resolve the issue with Social Circle City Schools.



### **Social Circle City Schools Federal Programs for Which Complaints Can Be Filed:**

- a. Title I, Part A (Disadvantaged Children)
- b. Title I, Part C (Migrant Education program)
- c. Title I, Part D (Neglected and Delinquent)
- d. Title II, Part A (Teacher and Leader Quality)
- e. Title III, Part A and English to Speakers of Other Languages (ESOL)
- f. Title VI, Part B
- g. McKinney-Vento Act
- h. IDEA: The Individuals With Disabilities Act
- j. ESSER I/CARES
- k. ESSER II/CRRSA
- l. ESSER III/ARP

### **Filing a Complaint**

To file a complaint, a complaint must be made in writing and signed by the complainant. It must include the following:

- a. A statement of the violation of requirements of a Federal statute or regulation.
- b. The date of the violation.
- c. The facts on which the statement is based and the requirement violated (include citation to the federal statute or regulation).
- d. A list of the names and phone numbers of individuals who can provide additional information.
- e. Copies of all documentation supporting the complainant's position.
- f. The address of the complainant.
- g. Whether a complaint has been filed with a school, and if so, with which school.

The complaint can be addressed and sent to:

Social Circle City Schools  
Attention:  
147 Alcova Drive  
Social Circle, GA 30025

Once the complaint is received by the office of the superintendent, it will be copied and forwarded to the appropriate federal program director.

### **Investigation of Complaint**

Within ten (10) days of receipt of the complaint, the office of the Superintendent of Social Circle Schools or his or her designee will issue a Letter of Acknowledgement to the complainant that contains the following information:

- The date the SCCS received the complaint.
- How the complainant may provide additional information.
- A statement of the ways in which the SCCS may investigate or address the complaint.
- Any other pertinent information.

If the complaint involves a school, the federal program director will also send a copy of the Letter of Acknowledgement to the principal, along with a copy of the complaint. The federal

program director will contact the principal to clarify the issues and review the complaint process. If the complaint cannot be resolved through this contact, the federal program director will invite the principal to submit a written response to the complainant. The federal program director will review the information and determine whether:

- Additional information is needed.
- An on-site investigation must be conducted.
- Other measures must be taken to resolve the issues raised in the complaint.
- A Letter of Findings can be issued.

If additional information or an investigation is necessary, the school system will have 60 days from receipt of the information or completion of the Investigation to issue a Letter of Findings. If the Letter of Findings indicates that a violation has been found, corrective action will be required and timelines for completion will be included. The 60 day timelines outlined above may be extended, if exceptional circumstances exist.

The Letter of Findings will be sent directly to the complainant.

### **Right of Appeal**

If an individual, organization, or agency is aggrieved by the final decision of the Social Circle City School System, that individual, organization, or agency has the right to request review of the decision by the Georgia Department of Education. The review is at the department's discretion.

For complaints filed pursuant to Title IX, Part E, Subpart 1, Section 9503, a complainant may appeal the decision to the Georgia Department of Education no later than 30 days from the date on which the complainant receives the Letter of Findings. The appeal must be accompanied by a copy of the system's decision and include a complete statement of the reasons supporting the appeal.

Stakeholders are made aware of the Federal Programs Complaint Procedures through the system and school websites. The Federal Programs Complaint Procedures are also disseminated to all Social Circle City Schools' administrators, faculty, and staff within the first of each school year. Documentation of the dissemination is kept on file by the Title I, Part A Director.

## **SECTION 24: ETHICS and FRAUD, WASTE, and ABUSE**

The Code of Ethics for Georgia Educators and the system fraud, waste, and abuse policy are reviewed with all employees. Principals are required to discuss these policies at a faculty meeting at the beginning of the year after these items are addressed at the beginning-of-year administrative meeting. The SCCS System Board Policy Fraud Prevention describes the definitions of fraud, waste, and abuse. Principals will disseminate copies of the Code of Ethics for Georgia Educators and fraud, waste and abuse policy and maintain evidence of implementation of dissemination to include sign-in sheets, agendas, and meeting minutes.

### **Fraud, Waste, Abuse and Corruption Procedure**

This procedure applies to all federal, state, and local financial activities, including but not limited to: Title IA, Title IC (Migrant), Title ID (Neglected & Delinquent), Title IIA, Title III(ESOL), IDEA, Title XC McKinneyVento Act (Homeless), School Improvement (1003a, 1003gSIG), ESSER I/ARP, ESSER II/CRRSA, ESSER III/ARP..

Notification:

1. During a System Administrative meeting of each school year, a Federal Programs representative reviews the Fraud, Waste, Abuse, and Corruption procedures with all system level administrators and principals. An agenda and sign-in sheet will be kept by a designee at the district level as documentation that this training session was completed.
2. Principals will disseminate the same information with their personnel during a faculty meeting by the end of August of each school year. Each principal will submit agendas and sign-in sheets to the system office designee to verify the procedures have been reviewed with all staff.
3. System level administrators will disseminate the same information with staff members that are not located in a school facility. Each director will submit agendas and sign-in sheets to a system office designee to verify that the procedures have been reviewed with all staff. Directors will review the procedures with staff members by the end of August of each school year.
4. The Fraud, Waste, Abuse, and Corruption procedures will be posted on the system's website.

**Reporting Suspicion of Prohibited Activities**

Employees shall practice good stewardship of Social Circle City Schools financial resources, including timely reporting of fraudulent expenditures to the appropriate authorities.

**Definitions:**

**Waste:** Defined as the intentional or unintentional, thoughtless or careless expenditure, consumption, mismanagement, use, or squandering of district, state, or federal resources Waste also includes incurring unnecessary costs because of inefficient or ineffective practices, systems, or controls. Waste does not normally lead to an allegation of “fraud”, but it could.

**Fraud:** Defined as a false representation of a matter of fact whether by words or by conduct, by false or misleading statements, or by concealment of that which should have been disclosed, that is used for the purpose of misappropriating property and/or monetary funds to the benefit of themselves, others, or the system.

**Abuse:** Defined as excessive or improper use of a thing, or to employ something in a manner contrary to the natural or legal rules for its use; intentional destruction, diversion, manipulation,

misapplication, maltreatment or misuse of resources; extravagant or excessive use as to abuse one's position or authority. Abuse does not normally lead to an allegation of “fraud”, but it could.

**Corruption:** Defined as dishonest or fraudulent conduct by those in power, typically involving bribery. The process by which something, typically a word or expression, is changed from its original use or meaning to one that is regarded as erroneous or debased.

**Ethics:** The Code of Ethics for Educators defines the professional behavior of educators in Georgia and serves as a guide to ethical conduct. The Professional Standards Commission has adopted standards that represent the conduct generally accepted by the education profession. The code defines unethical conduct justifying disciplinary sanction and provides guidance for protecting the health, safety and general welfare of students and educators, and assuring the citizens of Georgia a degree of accountability within the education profession.

**This procedure relates to Standards #1, 4, 5, 6, 9, & 10 of The Code of Ethics for Educators.**

**Examples of Fraud, Waste, Abuse, and Corruption: (Not All-Inclusive)**

- Personal use of district-owned vehicles
- Long distance personal phone calls
- Personal use of district-owned supplies or equipment
- Violations of system and/or state procurement policy
- Excessive or unnecessary purchases
- Falsification of official documents (timesheets, leave reports, travel vouchers, etc.)
- Contract fraud
- Conducting personal business on district time
- Inappropriate expenditures
- Embezzlement
- Bribery

**Statement of Social Circle City Schools Administrative Regulations:** SCCS thoroughly and expeditiously investigates and administratively reports cases of suspected fraud to determine if disciplinary, financial recovery and/or criminal action should be taken.

**Confidentiality:** All reports of suspected fraud must be handled under the strictest confidentiality. Only those directly involved in the investigation should be provided information regarding the allegation. Informants may remain anonymous but should be encouraged to cooperate with investigators and should provide as much detail and evidence of alleged fraudulent acts as possible. To ensure the reporting of any acts of suspicious waste fraud, abuse and/or corruption activity, Social Circle City Schools provides employees, clients and providers with confidential channels for such reporting.

**Procedures and Responsibilities:**

1. Anyone suspecting any acts of waste, fraud, abuse and/or corruption activity concerning federal programs should report their concerns to the appropriate Federal Program Director for Social Circle City School System at 770-464-2731
2. Any employee (temporary staff, full-time staff and contractors) who receives a report of suspected fraudulent activity must report this information within the next business day.
3. Employees have the responsibility to report suspected waste, fraud, abuse and/or corruption activity. All reports can be made in confidence.
4. The SCCS Board of Education shall conduct investigations of employees, providers, contractors, or vendors.
5. If necessary, person's reporting a violation will be contacted for additional information.
6. Periodic communication through meetings should emphasize the responsibilities and channels to report suspected fraud.

## **SECTION 25: RECORDS RETENTION**

Local Educational Agencies (LEAs) receiving federal funds are required to maintain records in accordance with the 2 C.F.R. Part 200 – Uniform Administrative Requirements, Cost Principles and audit Requirements for Federal Awards. In addition, LEAs must comply with local records retention policies.

LEA records maintained in accordance with 2 C.F.R. Part 200 will be considered in compliance with federal requirements for records retention. 2 C.F.R. Part 200 sections appropriate for records retention are provided below.

### **Title 34 Code of Federal Regulations Parts 76 § 76.730 – Records Related to Grant Funds of EDGAR.**

- A state and subgrantee shall keep records that fully show:
  - The amount of funds;
  - How funds were used;
  - Total cost of the project;
  - Share of the cost provided from other sources; and
  - Other records to facilitate an effective audit.

Note: There are references throughout the new reporting requirements on financial management in 2 C.F.R. Part 200.302 (performance reporting)

### **§ 76.731 – Records Related to Compliance**

- A state and subgrantee shall keep records to show its compliance with the program requirements.

The Federal Freedom of Information Act (5 U.S.C. 552) does not apply to records unless required by federal, state, or local law; grantees and subgrantees are not required to permit public access to their records. (Approved by the Office of Management and Budget under control number 1880- 0517) (Authority: 20 U.S.C. 3474; Uniform Administrative Requirements, Cost

Principles, and Audit Requirements for Federal Awards [2 C.F.R Part 200], [53 FR 8071 and 8087, Mar. 11, 1988, as amended at 53 FR 8072, Mar. 11, 1988; 53 FR 49143, Dec. 6, 1988; 64 FR 50392, Sept. 16, 1999])

## **HOMELESS**

SCCS does not receive funds directly from the McKinney-Vento Education of Homeless Children and Youth Assistance Act. Nonetheless, the LEA recognizes the importance of removing barriers to education for homeless students. Annually, the homeless liaison attends training provided by the GaDOE and works with school counselors and local agencies to identify homeless children and youth. Reports of potential homeless students are made to the Homeless Liaison through the school counselors referral form or via phone; in turn, the liaison reports confirmations of homeless students to the student information system coordinator and the Title I director. Notices containing the homeless liaison's name and contact information are provided during enrollment and posted in all schools and several community agencies, disseminated to employees. After contacting parents/guardians to verify homeless status and residence, the district utilizes several diagnostic tools, case study information and interviews to target the student's economic and social needs. Identified homeless students are designated in the Student Information System, with all data/information collected used to address targeted needs for tutoring, transportation, school supplies, and health needs. The homeless liaison works with parents to ensure that documentation for timely enrollment in the student's zoned school is obtained. The federal programs director communicates with the parents/guardians and, if needed, additional Title I funds are made available to support homeless needs. Each student designated as homeless is eligible for free and reduced priced meals and all other services/opportunities afforded to other students as well as assistance from school counselors with school supplies. School counselors and local agencies assist with meeting student needs. School programs are in place to ensure that student needs are met both academically and emotionally. The website [www.serve.org/nche.states](http://www.serve.org/nche.states) is used to provide resources to help schools maintain compliance with the McKinney-Vento Act. The director of federal programs, who is the homeless liaison, works consults and trains school personnel, including school counselors and attendance officers, as well as enrollment clerks, teachers, principals, and bus drivers, to identify children in homeless situations. The director is consulted if the need for transportation to a school of origin, and the director makes the arrangements through the transportation department.