

Wilcox County School System

Federal Programs Procedural and Internal Controls Handbook



2023-2024

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Updated November 2022

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Wilcox County Federal Program Monitoring

NOTE: THIS ENTIRE DOCUMENT DESCRIBES THE REQUIREMENTS FOR THE WILCOX COUNTY SCHOOLS TITLE I AND ALL OTHER FEDERAL PROGRAMS

The information included in this document is pertinent to the following Federal Programs. Programs for which Wilcox County Schools receives funds are in ***bold italics***:

- **Title I Part A** (CFDA 84.010)- State Program Code 1750
- Title I Part A Academic Achievement Awards (CFDA 84.010)-State Program Code 1752
- **Title I School Improvement 1003(a)** (CFDA 84.010)-State Program Code 1770
- Title I, Part A Reward Districts Awards (CFDA 84.010)-State Program Code 1753
- Title I, Part D Neglected and Delinquent (CFDA 84.010)-State Program Code 1755
- **Title I, Part C Migrant** (CFDA 84.011)-State Program Code 1762
- **Title II, Part A Teacher Quality** (CFDA 84.367)-State Program Code 1784
- **Federal programs director, Part A Language Instruction for LEP and Immigrant Students** (CFDA 84.365A)-State Program Codes 1811 and 1816
- **Title IV A, Student Support and Academic Enrichment** (84.424A)- State Program Code 1779
- **Title V, Part B Rural Education Achievement Program (REAP)** (CFDA 84.358)-State Program Code 1847
- **School Improvement 1003(g) (SIG) Grant ended FY21** (CFDA 84.377)-State Program Code 1775
- **Title IV, Part B: 21st Century Community Learning Centers-** (84.287C) State Program Code 1839
- **Title VI-B IDEA Flowthrough grant-Section 611of IDEA-**(84.027A) State Program Code 2824
- **IDEA Preschool Grant-Section 619 of the IDEA 2004-**(84.173A) State Program Code 2820
- **Coronavirus Aid, Relief, and Economic Security (CARES I) Act (2020)-**(CFDA 84.425D) State Program Code 4155
- **Coronavirus Response and Consolidated Appropriations Act CARES II (2021)-**(84.425D) State Program Code 4180
- **America Rescue Plan Act ARPA CARES III-**(84.425U) State Program Code 4190
- **ARP-611 Supplemental Relief-Flowthrough-**(84.027X) State Program Code 2838
- **ARP-619 Supplemental Relief- Preschool-**(84.173x) State Program Code 2839

The procedures in this manual apply to all Federal Programs/IDEA in which Wilcox County Schools receives funds for as well as CLIP, SSIP, SWP, Equity Plan and Professional Learning.

PURPOSE OF FEDERAL PROGRAMS HANDBOOK

The purpose of this procedural handbook is to provide a systematic approach to managing the rules and guidelines of all federal programs to ensure consistent compliance with program and fiscal requirements. Staff use the provided information to ensure that Federal programs are being implemented accurately and effectively. The information contained in this handbook will promote uniformity in operations as Federal Programs staff seek to carry out official duties and responsibilities. The Georgia Department of Education (GaDOE) provides Local Educational Agencies (LEAs) extensive guidance on the over-arching requirements for all Federal Programs via the on-site monitoring document that is used to ensure that LEAs are meeting all statutory requirements of Federal programs. The specific requirements from the GaDOE monitoring document were used to create this handbook. Step by step procedures, state and local board policies and checklists are included in this procedural handbook. It is the intent that this handbook will be useful in assisting faculty and staff to comply with all federal programs statutory requirements.

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OVERARCHING REQUIREMENT FOR ALL FEDERAL PROGRAMS

LOCAL EDUCATIONAL AGENCY (LEA) MONITORING OF SCHOOLS AND PROGRAMS ESEA: 1114(b)(3); 1304; 1306; 9304; 2104(a)(1); 2CFR 200.301, 200.328, 200.330, 200.26(c); 34 CFR 300; McKinney Vento; 722(c)(3)(E) Non-Regulatory Guidance Using Evidence to Strengthen Education Investments (2016)

The Elementary and Secondary Education Act (ESEA), as reauthorized by the Every Student Succeeds Act of 2015 (ESSA), requires the Wilcox County School System (WCSS) to monitor the implementation of federal program requirements and the expenditure of federal program funds. WCSS will ensure that each program is:

- Administered in accordance with all applicable statutes, regulations, program plans, and applications.
- Implemented using fiscal control and fund accounting procedures to ensure proper disbursement and accounting for funds for each program.
- Evaluated through monitoring of initiatives for compliance and objective outcomes.

Monitoring is systematic and routine mechanism that is also used as a tool to improve program quality. Ongoing and effective monitoring allows for regular collection of information about the programs that can lead to improved performance toward meeting specific goals and objectives. Monitoring is an essential component of ensuring that all facets of federal programs are being implemented as prescribed by all statutory requirements. It leads to a process of providing technical assistance and collecting data in order to provide information that can guide program implementation with fidelity.

FEDERAL PROGRAMS MONITORING PROCESS

The Every Student Succeeds Act of 1965 (ESSA), as reauthorized by the Every Student Succeeds Act of 2015 (ESSA), requires the Wilcox County School System (WCSS) to monitor the implementation of program requirements and the expenditure of federal funds. Included in this monitoring process as authorized

by the Elementary and Secondary School Emergency Relief are funds allocated as a result of the Coronavirus Aid, Relief and Economic Security (CARES) Act of 2020, Coronavirus Response & Relief Supplemental Appropriations (CRSSA) Act of 2021, and the American Rescue Plan Act (ARPA) of 2021. WCSS will ensure that each program is:

Administered in accordance with all applicable statutes, regulations, program plans, and applications. - Implemented using fiscal control and fund accounting procedures to ensure proper disbursement and accounting for of funds for each program.

- Evaluated through monitoring of initiatives for compliance and objective outcomes. Monitoring is a systematic and routine mechanism that can be used as a tool to improve program quality. Ongoing and effective monitoring allows for regular collection of information about the program that can lead to improved performance toward meeting specific goals and objectives. Monitoring is an essential component of ensuring that all facets of federal programs are being implemented as prescribed by all statutory requirements. It leads to a process of providing technical assistance and collecting data in order to provide information that can guide program implementation with fidelity.

Monitoring is an essential component of ensuring that all facets of the Federal Programs are being implemented. It is a process of systematically providing technical assistance and collecting data in order to provide information that can guide program implementation. Wilcox County School System makes use of monitoring as a means of regular observation and recording of activities taking place in Federal Programs in schools. Critical to this process is the feedback provided to schools that can assist in improving student academic achievement. System level monitoring addresses the following:

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

Monitoring by the Georgia Department of Education (GaDOE) consists of five major components:

1. Program Requirements-WCSS must submit for approval the Consolidated LEA Improvement Plan (CLIP) through the consolidated application process. Federal Programs staff review each CLIP to ensure that the plan contains allowable activities for use and budgeting of federal funds. Once the CLIP has been approved, the LEA submits a budget reflecting the approved CLIP activities for review and approval by the Federal Programs staff assigned to the LEA. The LEA updates its CLIP under ESSA, as needed, to reflect changes, and it submits the updated CLIP to the SEA for review and approval. Updates to the CLIP are typically performed on an annual basis in Georgia.
2. Monitoring of Expenditures – Local educational agencies (LEAs) must submit for approval an annual budget through the Consolidated Application process. Title I Education Program Specialists review each application and budget to ensure that expenditures are appropriate for the program area before approving LEA budgets. Once budgets are approved, Title I Education Program Specialists track how well LEAs are requesting funds for expenditures to ensure that LEAs are likely to meet the expenditure requirements for Title I funds.
3. Single Audit under 2 C.F.R. Part 200.50(b) – An audit is a formal or official examination of records and accounts with the intention to verify that proper accounts have been followed, and attending documentation has been maintained. If an auditor is unable to verify a program's accounts, procedures, and documentation, WCSS will be notified in writing either by first class mail, or by electronic mail, of an exception or audit finding(s). The Division of Federal Programs will follow procedures as outlined in the Subrecipient Audit Resolution Guide for resolving an LEA audit findings through a single audit process.
4. On-site Monitoring – A SEA on-site Cross-Functional Monitoring Team visits a LEA to apply the criteria included in the *LEA Monitoring Form*. LEA's are monitored, at a minimum, on a four-year cycle.

The following procedures are followed for the on-site monitoring visit:

- Selection of LEAs to be monitored.
- LEAs are monitored on a five-year cycle. Approximately one-fifth of the LEAs are monitored each year.
- LEAs were initially randomly selected from each of Georgia's ten service areas.
- LEAs with audit or monitoring findings requiring a return of monies, or receiving a high number of complaints from parents and other stakeholders are monitored within the year of the LEA audit or monitoring report and the written complaint. For example, if an LEA is audited in FY21 for FY20 and the Division receives the report of findings in FY21 before the end of the monitoring cycle, the LEA would be included in the LEAs to receive an on-site monitoring visit. In addition, on-site monitoring outside of the scheduled cycle may be arranged as needed if an LEA evidences serious or chronic compliance problems.

Depending on the implementation of the program at the LEA, the following federal programs may be included on the on-site cross functional monitoring team visit:

- Title I, Part A-Improving the Academic Achievement of the Disadvantaged
- Title I Part A- Academic Achievement Awards
- Title I Part A- School Improvement Grants- 1003a
- Title I Part A- School Improvement Grants- Assistance for School Improvement-1003g
- Title I Part A and Title I Part D-Programs for Neglected and Delinquent Children
- Title I Part C -Education of Migratory Children
- Title II Part A- Supporting Effective Instruction
- Federal programs director, Part A- Language Instruction for English Learners and Immigrant Students
- Title IV, Part A- Student Support and Academic Enrichment
- Title IV, Part B-21st Century Community Learning Centers
- Title V, Part B- Small, Rural, Education Achievement Program (REAP)
- Title I, Part A and Title X, Part C- McKinney Vento Homeless Education Assistance for Children and Youth
- Title I, Part A- Parent and Family Engagement
- Title I, Part A, 1112 Notice to Parents
- The Individuals with Disabilities Education Act (IDEA)
- ESSER I: Coronavirus, Aid, Relief & Economic Security (CARES) Act
- ESSER II: Coronavirus Response & Relief Supplemental Appropriations (CRSSA) Act
- ESSER III: American Rescue Plan (ARP) Act

The results of the cross functional monitoring team visit are reported through the e-monitoring reporting site within the MyGA DOE portal. Each of the federal programs has its own corridor within the e-monitoring reporting site. The Title I Education Program Specialists serves as the team lead for the cross functional monitoring teams. Each federal program that has staff assigned to a team will designate one program staff member as the program's team lead. The program team lead is responsible for entering data and writing the finding and corrective actions for the specific program, as needed. If there is a federal program that is applicable to the LEA and staff is limited then it may be possible to conduct the monitoring desktop. A copy of all documentation is maintained with the SEA.

5. Self-Monitoring- WCSS will conduct self monitoring each fiscal year that the district does not participate in the cross functional monitoring process. LEA's not receiving an on-site visit may complete and submit the Self- Monitoring Checklist located within the reporting site on the MyGA DOE portal (200.328(a)).

LEA COMMUNICATION WITH AND MONITORING OF TITLE I SCHOOLS

Monitoring of Title I schools is a critical component of ensuring that compliance is taking place at each school. During the summer prior to the beginning of the new school year and after the Annual Title I Conference in June, the district Federal Programs Director convenes a meeting with system and building level administration during the summer. Administration receives training on policies and procedures and guidance for operating federal programs including the Title I program.

Administration is given detailed information on expectations and copies of program guidance. Specific training is provided in all facets of Title I. Information provided includes timelines, budget forms, inventory information, schoolwide implementation, parental involvement, waste, fraud, and abuse policy and other areas of Title I as appropriate. Monthly Superintendent's Cabinet meetings are also held with system level administration and building principals. Specific budget information is given out at these meetings. Phone calls and emails occur frequently between the Federal Programs Director and school staff. Due to our rural size, having three schools under one roof, weekly visits also occur. The Federal Programs Director and Family Engagement Coordinator/Special Education Director both attend school and district level leadership team meetings monthly to monitor programs and check for effectiveness. Questions regarding allowability, sustainability, and effectiveness of funded programs are addresses. All Title I services are supplemental. This process is monitored through on-going technical assistance, site visits, and through the budgeting process.

ONSITE MONITORING PROCEDURES

All Title I schools are subjected to on-going monitoring by the Federal Programs Director throughout the school year. The Federal Programs Director will conduct formal on-site monitoring of all schools at least once per quarter to ensure compliance with Title I guidelines. Feedback will be provided to the principals via checklists and descriptive information. In addition, emails, face to face meetings, and phone conversations take place throughout the year as a means of providing on-going monitoring and communication with each Title I school principal. The school leadership teams monitor and document progress on goals and action steps from the school level plans as well as district improvement plans. The Federal Programs Director is an active participant in the school improvement process and attends monthly meetings updating the short term action plans and progress towards goals.

TIMELINE FOR MONITORING TITLE I SCHOOLS

Annual Timeline

- **June**
 - GADOE Federal Programs Conference
 - Gather FTE and Poverty Data for schools
 - Finalize the Comprehensive Needs Assessment and Improvement Plans
 - Complete end of year Title IV A Effectiveness summary
 - Complete Self-Monitoring
- **July**
 - Complete Periodic Certifications
 - RAMP Submission July 1
 - Comprehensive LEA Improvement Plan (CLIP) submission (July 31)
 - Distribution of Right to Know notification
 - Staff professional learning on grant requirements
 - Prioritize the Distribution of Funds (Title IV, Part A)
 - Consult with Homeschool parents/guardians (IDEA)

- **August**
 - Ensure proper assignments of teachers based on professional qualifications (In-Field Portal)
 - Completion of Title I teacher schedules
 - Initial distribution of letters to English Learner (EL) families (ELs participating in Title I or Federal programs director funded supplemental English language support services) (30 days after the beginning of the school year)
 - Distribution of District Parent and Family Engagement Policy
 - Distribution of Right to Know notification
 - Begin distribution for 20-Day Parent Notifications (Dissemination 10 business days after the 20-day period)
 - Title I Annual Meetings and Open House Meetings to Gather Stakeholder Input on School Parent Compacts (Title I, Part A)
 - Distribution of Parent and Family Engagement Policies (Title I, Part A)
 - Homeless Liaison and Foster Care Point of Contact update school contact personnel
- **September**
 - Title I Public School Allocation Tab Completed (Schools and grade span only) (September 15)
 - Deadline for meeting expenditure requirements (September 30)
 - Annual Education for Homeless Children and Youth Survey (September 30)
 - Schoolwide Plan Checklists due (Title I, Part A only)
 - Curriculum/Academic Nights
 - Distribute private school letters for consultation meeting (private schools)
 - Title I Annual Meetings and Open House Meetings to gather stakeholder input on School Parent Compacts (Title I, Part A)
 - Distribution of Parent and Family Engagement Policies (Title I, Part A)
- **October**
 - Archive documentation
 - GEPA 427 Attachment in Consolidated Application (October 1)
 - Budget deadlines – Title I, Part A; Title II, Part A; Federal programs director, Part A (October 1)
 - Superintendent Prayer Certification sign-off (October 1)
 - FTE enrollment data submission (first Tuesday in October)
 - CPI transmission cycle begins
 - Review CPI data
 - Completion report (October 31)
 - Distribute private school letters for consultation meeting (new private schools)
 - Fall Parent Teacher Conferences
- **November**
 - Title I Annual Meetings complete and compact cover letters complete (by November 1)
 - Parent Engagement Month Activities
- **December**
 - Annual Neglected and Delinquent Survey due (December)
 - Submission of Title I teacher and paraprofessional schedule changes for second semester (Title I, Part A only)

- **January**
 - Complete periodic certifications for July-December (all programs)
 - Submit carryover amendments
- **February**
 - School Improvement Forum meetings for input on the School Improvement Plan/Schoolwide Plan, Parent and Family Engagement Policy, reservation of funds
- **March**
 - District team meetings for the Comprehensive Needs Assessment
 - School Improvement Forum meetings for input on the School Improvement Plan/Schoolwide Plan, Parent and Family Engagement Policy, reservation of funds
 - Spring Parent Teacher Conferences
- **April**
 - District team meetings for the Improvement Plan
 - Parent Advisory meeting for the District Comprehensive Needs Assessment, Improvement Plan and CLIP
- **May**
 - Deadline for amendments for Title I, Part A
 - Distribution of Parent Notification of Student Continuation of ESOL Services (Federal programs director, Part A)
 - Deadline to submit Education of Homeless Children and Youth (EHCY) Evaluation and Continuation Report

School Improvement Plans (SIP) includes data which drive student achievement. Based on continuous data analysis, principals, and leadership teams make changes to the school improvement plans. Wilcox County School System follows the 8 step School Improvement Cycle. Wilcox County School System is proud to have COGNIA accreditation.

Feedback on the Title I Schoolwide plans are provided to each principal via the Schoolwide checklist. Corrections to the plans are made as needed by principals and updated copies are sent to the Title I office and posted on each school's website.

MONITORING OF NEGLECTED AND DELINQUENT STUDENTS

Currently, there are NO residential facilities for neglected and/or delinquent students in the Wilcox County School System.

MONITORING OF PRIVATE SCHOOLS

Private schools collaboration is monitored by the Federal Programs Director. Invitations for private schools to consult in participation in federal programs the following calendar year are sent in the Fall, usually October, via the ES4PS portal. A meeting is held in October/November to present information about the programs available to students in private schools. Currently, Wilcox County School System is not serving any private schools.

LEA COMMUNICATION WITH AND MONITORING OF SPECIAL EDUCATION

Monitoring of Special Education programs in Wilcox County Schools is a critical component of ensuring compliance is taking place at each school. Administration and teachers receive critical updates every summer following federal programs conference in June. The Special Education director convenes a meeting with system and building level administration before the beginning of school or soon after school starts. Teachers and Administrators receive training on policies and procedures and guidance for operating federal programs including Special Education. Staff is given detailed information on expectations and copies of program guidance. Specific training is provided in different areas of special education. Information provided includes budget information, timelines, special education procedures, IEP guidelines, Child Find procedures, community partnerships, parental involvement and other areas of Special Education as appropriate. Monthly Superintendent's cabinet meetings are also held with system level administration and building principals. Building level meetings are held once a month with principals, counselors, and district administration to discuss specific instructional initiatives going on each individual school. Monthly meetings are held with Special Education Staff to provide technical assistance and targeted professional learning needs. Specific budget information and details of the program are given out at this meeting. Weekly and most times daily visits to the schools take place by the Special Education Director. IEP meeting are attended by the director as well as informal meetings with parents with concerns. Phone calls, emails, and classroom visits occur frequently between the Special Education Director and Special Education Staff. The program is monitored through on-going technical assistance, site visits, and through the budgeting process.

ONSITE MONITORING PROCEDURES FOR SPECIAL EDUCATION

All schools are subjected to on-going monitoring by the Special Education Director throughout the school year. The Special Education Director will conduct formal on-site monitoring of program delivery at least once per quarter. In addition, emails, face to face meeting, testing checklist, IEP checklist, review of records, and phone conversations take place throughout the year as a means of providing on-going monitoring and communication with staff members. The Special Education Director monitors and works closely with the school psychologist to ensure timelines and evaluation/re-evaluation procedures are being followed. Teachers at each school are provided with technical assistance through monthly staff meetings involving special education staff.

SCHEDULES

Each school is monitored according to the timeline provided above. Sign in sheets, agendas, and materials/handouts discussed are maintained by the Federal Programs Director.

DATA REVIEW

Data is compiled, reviewed, and discussed during District Leadership Team meetings, School Leadership Team meetings, Superintendent Cabinet meetings, School Council meetings and at Board of Education meetings. System level and building level leadership meet and analyze data with the intent of improving instruction. Principals review data with their leadership teams to identify and address areas in need of improvement. The District Leadership Team drills down into the data to identify root causes that keep our schools from achieving academically. After a thorough data analysis, SMART goals are established. All Title I schools have data rooms that are used during the data analysis process. School leaders discuss this information with all staff to ensure they fully understand the data presented.

IDENTIFICATION OF HIGH RISK SCHOOLS

WCSS consist of 3 schools all in the same building therefore identification of High Risk Schools takes on a district approach. The WCSS does complete a risk assessment to monitor schools that may be at higher risk of not meeting program requirement, program regulations, or administrative procedures. The risk assessment is based on employee experience, school scores, meeting fiscal requirements, and compliance issues. Schools are rated on the following criteria:

- Principal Experience
- Bookkeeper experience
- Hiring of Staff
- Latest CCRPI score
- Percentage of unspent funds for the year
- Issues Identified during walkthroughs or documentation review
- Submission of Title I documents
- Missing Title I inventory items

Each school is assigned points based on the rubric below.

Category	0 points	1 point	2 points	3 points
Principal Experience	≥ 1 Year Experience with Federal Grants as Principal in WCSS	Experienced Principal but New to Federal Grants	New Principal but has Federal Grant Experience	New Principal and New to Federal Grants
Bookkeeper Experience	≥ 1 Year Experience with Federal Grants as Bookkeeper	Less than a Full Year Experience	NA	NA
Hires Staff in a Timely Manner	No Delays in Hiring Staff	Some Delays in Hiring Staff	Major Delays in Hiring Staff or Staff Missing for the Majority of a Semester	Staff not Hired or Staff not Replaced
Latest CCRPI	80 and above	70-79	60-69	Below 60
Percentage of Unspent Funds in FY19	< 15% Unspent	15-25% Unspent	26%-40% Unspent	> 40% Unspent
Issues Identified During School Visits/ Documentation Review	None	1-2 Issues Identified	3-4 Issues Identified	> 4 Issues Identified

Submission of Federal Grant Documents	On time	Submits Late but No Reminders Needed	1 Reminder Needed	Multiple Reminders Needed
Submission of Required Changes to Federal Grant Documents	Makes Changes On time	Makes Changes Late but No Reminders Needed	1 Reminder Needed	Multiple Reminders Needed
Missing Items on Physical Inventory	No Items Missing	1-2 Items Missing	3-4 Items Missing	> 4 Items Missing

The values for each category are summed. Schools will be grouped as follows:

- Low Risk: 0 – 8 Points
- Moderate Risk: 9 – 16 Points
- High Risk: 17 – 25 Points

Schools in the high risk category will have additional support provided from the grant administrator(s). Technical assistance will be provided through professional learning, meetings, phone calls and/or emails. Schools scoring a 2 or 3 in a category will receive additional technical assistance in that specific area of need.

TECHNICAL ASSISTANCE

Technical Assistance is offered at all times through e-mail and phone communication as well as school visits to assist schools in analyzing data to identify priorities in instruction, professional learning, and effective budgeting. During the summer, a meeting is held with system and building level administration that reviews the purpose of all federal programs, as well as expectations and procedures related to allowable use of funds. On-going information is provided at monthly superintendent's cabinet meetings to remind principals of information as the year progresses. The Federal Programs Director maintains a file of all training conducted throughout the year. This file contains all staff training, handouts, meeting agendas, meeting notes, etc. Ongoing monitoring continues after training is conducted by the Federal Programs Director to ensure compliance.

ACCOUNTABILITY

AUDITS AND CROSS FUNCTIONAL MONITORING FINDINGS

The Wilcox School System undergoes regular audits as scheduled by the State of Georgia. Correction action plans are created to correct any findings received. The school system will maintain the appropriate documentation to indicate that correction actions have been completed and any findings have been cleared. Steps to Audit/ Monitoring Resolutions:

- Once the audit/ Cross-Functional Monitoring report is received, the Federal Programs Director will review all items. The Cross-Functional Monitoring report will be pulled from the GaDOE website under the Consolidated Application.
- Each item will be examined carefully, and a team of district level and building level staff will determine the best means of corrective action.
- Items are gathered, and a report is written by the Federal Programs Director.
- The report is submitted to the superintendent.

- The completed report is then sent to the GaDOE/ state auditors as a means of resolution.
- The district has 30 days from the receipt of the findings to respond to the GaDOE.
- The monitoring process and the resolution process are both used as a learning resource.

CONSOLIDATED APPLICATION

The Georgia Department of Education (GaDOE) is committed to developing tools and resources to support the efforts of local school districts to improve the academic achievement of all students. Section 1112 of the Elementary and Secondary Education Act of 1965 (ESEA) specifies that local educational agencies (LEAs) may receive funds under ESEA if the LEA has on file with the GaDOE an approved plan. Georgia's LEA Consolidated Application is a Web based application to facilitate the efficient and effective transfer of planning and budget information from LEAs. The information in this guidance is related to the planning component.

The Comprehensive LEA Improvement Plan (**CLIP**) for student academic achievement has two major components:

1. **ESEA Descriptors** - This section includes the descriptors required in Federal and state legislation that LEAs must address in order to receive funding. The template is designed to cover the requirements in all programs in one document. The template eliminates the need to have multiple plans. Some programs have unique components that require the completion of surveys, etc. LEAs will submit surveys and unique information through the Consolidated Application in a special section labeled Attachment Tab (Carl D. Perkins Vocational and Applied Technology Act are examples).
2. **LEA Implementation Plan** - This section includes the LEA's goals, annual measurable objectives, action/strategies and other components of an action plan. The LEA Implementation Plan eliminates the need for LEAs identified as needs improvement to submit a separate LEA improvement plan.

Each LEA must submit all components of the CLIP in order to receive funding from the following state and Federal programs:

1. Title I, Part A – Improving the Academic Achievement of the Disadvantaged
2. Title I, Part C – Education of Migratory Children
3. Title I, Part D – Prevention and Intervention Programs for Children and Youth who are neglected, delinquent or at-risk
4. Title II, Part A – Teacher and Principal Training and Recruiting Fund
5. Title II, Part D – Enhancing Education through Technology
6. Federal programs director, Part A – Language Instruction for Limited English Proficient and Immigrant Students
7. Title VI, Part B – Rural Education Initiative
8. Individuals with Disabilities Education (IDEA) – Programs for Exceptional Students
9. Carl D. Perkins Vocational and Applied Technology Act
10. Title X, Part C Education of Homeless Children and Youth (EHCY)
11. Professional Learning

COMPREHENSIVE LEA IMPROVEMENT PLAN (CLIP) REVIEW PROCESS

CLIP revisions take place annually in late spring or early summer and submitted according to the GADOE Federal Programs Year-At-A-Glance timeline. Using prior year data and needs assessment information the plan is reviewed and updated for the upcoming school year. 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. System and building level leaders, teachers, support staff, as well as community and parent stakeholders are involved in the revision process. Parents are sent information inviting them to participate via mail, email, telephone, newspaper, social media, flyers, website, and newsletters. The district conducts an annual meeting each year that allows parents to provide input on district policies and procedures. Parents are asked to submit written comments regarding eight various components of school programming. Parent input is examined and considered from these meetings.

Documentation includes sign-in sheets, agendas, power point presentations, emails, and returned needs assessments with comments. Comments are tallied to easily determine strengths and weaknesses. Results are kept on file. Several subsequent meetings are arranged to garner input from all stakeholders. For example, input is solicited from system and school leaders at monthly Superintendent Cabinet meetings. Input is also sought from system and school leaders as well as parents during the annual leadership retreat held in June. Feedback from community stakeholders is also solicited at one or two monthly Family Connection Collaborative meetings and one or two Extension Leadership Team meetings. The Federal Programs Director gathers all input and updates the Consolidated Local Improvement Plan (CLIP). The plan is submitted to the Superintendent for approval and then submitted to GaDOE specialists. For review and approval.

The plan is submitted to the GaDOE. Upon approval, the Plan is implemented in the district. If not approved, the Program director reviews the comments via the Audit Trail located in the Consolidated Application. Applicable stakeholders are contacted if needed. Revisions are made and the plan is resubmitted to the GaDOE in a timely manner. Information is shared with applicable stakeholders at meetings such as leadership, curriculum team, school council, and parental involvement.

Federal Programs Approval Process

Wilcox County School District approves the CLIP, SWP, Equity Plan, and FLP (if applicable) annually. The approval process includes the following steps:

- District leadership reviews the program guidelines
- A meeting is scheduled to invite applicable stakeholders
- Stakeholders are invited to participate (Website, Newspaper announcement, Phone Call, etc.)
- Data that relates to the program requirements is reviewed by stakeholders
- A Needs assessment is conducted
- Needs are prioritized according to program requirements and goals
- Plan is developed inclusive of strategies, timelines, evaluation, etc.
- Plan is shared with stakeholders for comments/feedback
- Plan is revised as needed (The guidance utilized to make revisions include a review of the previous year's plan, feedback from stakeholders, guidance received from GaDOE, Checklists provided by GaDOE, etc.)
- Plan is submitted for approval
- Plan is posted/shared via school website, student handbooks, per request, etc.

Resolution Procedures for Unapproved Plans (CLIP, Equity, and FLP)

Once the District Federal Programs Director receives notification of the unapproved plan, the following steps are taken:

- Audit trails when available are reviewed
- Program Area Specialists are contacted as needed.

- The federal programs director collaborates with internal stakeholders if needed.
- The plan is revised by the federal programs director
- The plan is re-submitted to GaDOE

Resolution Procedures for Unapproved Building Level Plans (SWP, PIP, etc.)

Once the District Federal Programs Director receives notification of the unapproved plan, the following steps are taken:

- Audit trails when available are reviewed
- Program Area Specialists are contacted as needed.
- The federal programs director collaborates with internal stakeholders if needed.
- The plan is revised by the federal programs director
- The plan is re-submitted to GaDOE

WILCOX COUNTY SCHOOLS AND TITLE I AN OVERVIEW OF SCHOOL-WIDE PROGRAMS

A school-wide program is a comprehensive reform strategy designed to upgrade the entire educational program in a Title I school; its primary goal is to ensure that all students, particularly those who are low-achieving, demonstrate proficient and advanced levels of achievement on State academic achievement standards. This school-wide reform strategy requires that a school-

- Conduct a **comprehensive needs assessment**;
- Identify and commit to specific goals and strategies that address those needs;
- Create a **comprehensive plan**; and
- Conduct an **annual review** of the effectiveness of the school-wide 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. School-wide 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 school-wide program. **All schools in the Wilcox County School System are school-wide Title I schools.** The purpose of school-wide Title I programs is to improve the entire educational program in a 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 those students to demonstrate proficiency on academic standards. A school is eligible to be a school-wide program:

- If the LEA determines that the school serves an eligible attendance area;
- If the school is participating under Section 1113 (eligible school attendance areas);
- For the first year of the school-wide program the school serves a school attendance area in which not less than 40 percent of the children are from low-income families or 40 percent of the students enrolled in the school are from low-income families.

School-wide 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 school-wide program. School-wide Title I schools must use funds available under Title I, Part A only to **supplement** the total amount of funds that would, in the absence of the Federal

fund, be made available from non-Federal sources for that school including funds needed to provide services that are required by law for students with disabilities and with limited English proficiency.

The core elements of a school-wide program are a comprehensive needs assessment, a comprehensive plan, and an evaluation. The comprehensive needs assessment is required, and it must:

- Be based on academic achievement data of all students including disaggregated student groups and migratory students regarding the State's academic standards.
- Provide information on the subjects and skills for which teaching and learning need to be improved.
- Identify specific academic needs of students and disaggregated student groups who are not achieving at proficiency.
- Be developed with the participation of individuals who conduct the school-wide program.

The school must document how it conducted the needs assessment, the results obtained, and the conclusions it drew from the results.

The comprehensive plan must be developed for schools that operate a school-wide program using the results of the comprehensive needs assessment. The plan must describe how the school will improve academic achievement throughout the school, particularly for students who have not achieved proficiency so that all students will demonstrate proficiency on the State's academic standards. The plan must:

- Improve teaching and learning throughout the school.
- Be developed in consultation with the LEA and its leadership team or other technical assistance providers.
- Describe how the school will conduct the needs assessment, develop the plan and evaluate the results.
- Describe how the school will use Title I and other resources.
- Include a list of State and local programs and other Federal programs that the school will consolidate in the school-wide program.
- Involve parents, members of the community to be served, teachers, principals, Title I administrators, and, if appropriate, pupil services personnel technical assistance providers, and other school staff, and students if the school is a secondary school.

All schools within the Wilcox County School System 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 at each school's annual leadership retreat after receiving feedback at Annual Title I Parent meetings. Parents are also invited to a district leadership team meeting in the spring to provide input on schoolwide plans. All schools will notify stakeholders in multiple ways, notice of the meeting dates will be placed on each schools marquee, in each school newspaper and on the web site, parents and other stakeholders will be notified by invitation sent from each individual school and all stakeholders will be notified using the system phone messaging system, One Call Now. 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 principal will be responsible for collecting the required information (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, Flexible Learning Programs, and the Comprehensive LEA Improvement Plan.

LEA GUIDANCE

On-site federal program review meetings are held with building administration to discuss the current status of their plans in regard to checklist components. Missing or items in need of revision are marked on the checklist and then rechecked when the revised plan is submitted. The system will also include parents in two

District Leadership Team meetings. Copies of agendas and sign-in sheets from such meetings are collected and stored 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 Superintendent Cabinet meetings, District Leadership Team meetings, and School Council meetings. During the meetings, data is analyzed to identify and develop solutions to challenges related to instructional strategies, parent involvement, professional learning, and budgets.

DEVELOPMENT OF NEW SCHOOLWIDE PROGRAMS

All schools within the school system have previously approved schoolwide programs.

FEDERAL PROGRAMS PLAN DEVELOPMENT

School Improvement and Schoolwide Plans as well as FLP, CLIP, SSIP and Equity Plan are updated each spring for the following school year. Each school leadership team conducts a leadership team meeting at which representatives from each grade level, content area, and department, as well as district and school administration and parents meet to revise or develop a plan. During district and school leadership team meetings, instructional strategies, parental involvement initiatives, and professional development activities are planned after a careful analysis of various data. Assistance is also provided to schools in their use of federal funds to accomplish initiatives representative of each plan. School administrators then present their school plans at the annual district leadership team retreat as they work with other schools, system leaders, and parents to develop a district improvement plan (CLIP), which encompasses all of the federal programs. It is through this process that the LEA oversees the development of federal program initiatives in which Wilcox County Schools are funded for.

PLAN CONSOLIDATION

The Wilcox County School System does not consolidate Schoolwide and School Improvement plans.

CONSOLIDATION OF FUNDS

The Wilcox County School System does not consolidate federal funds.

TARGET ASSISTANCE PROGRAMS

The Wilcox County School System does not have any target assistance programs.

PRE-KINDERGARTEN PROGRAMS

The district does not reserve funds for pre-kindergarten programs at this time. The Pre-K Director meets with area Head Start and private daycare centers to discuss potential concerns. Policies and procedures will be put in place if the district determines that this is a Title I need in the future.

The Title I office does provide scientifically-based preschool information for parents at the parent resource centers. This information is updated annually and serves as a means for connecting Title I parents with information their children will need to know before entering kindergarten.

ETHICS AND FRAUD, WASTE, AND ABUSE AND CORRUPTION POLICIES

The Federal Programs Director reviews the ethics and fraud, waste, abuse, and corruption policies with all administrators during the Back to school Convocation and/or Program reviews. An agenda and sign in sheets are kept by the Federal Programs Director to document this has been completed. Principals and Central Office Directors discuss the same information with their personnel if needed. Each principal submits agendas and sign-in sheets to the Federal Programs Director to verify the policies have been reviewed with all staff. A signature, by the person reviewing the policies, verifies the completion of this procedure. Principals are expected to inform their faculties about policies and updates as they are approved throughout the year.

ETHICS

(e) Standard 5: Public Funds and Property - An educator entrusted with public funds and property shall honor that trust with a high level of honesty, accuracy, and responsibility. Unethical conduct includes but is not limited to:

1. Misusing public or school-related funds;
2. Failing to account for funds collected from students or parents;
3. Submitting fraudulent requests or documentation for reimbursement of expenses or for pay (including fraudulent or purchased degrees, documents, or coursework);
4. Co-mingling public or school-related funds with personal funds or checking accounts; and
5. Using school property without the approval of the local board of education/governing board or authorized designee.

REPORTING SUSPICION OF FRAUDELENT ACTIVITIES

Purpose: To ensure the reporting of suspicion of fraudulent activity, the Wilcox county School System provides employees, clients and providers with confidential channels for such reporting.

Definitions: Fraud: A false representation of a matter of fact, whether by words, by conduct, or by concealment of that which should have been disclosed, that is used for the purpose of misappropriating property and/or monetary funds.

Statement of Administrative Regulations:

The Wilcox County School System thoroughly and expeditiously investigates and reported 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.

Procedures and Responsibilities:

1. Anyone suspecting fraudulent activity should report their concerns to the Wilcox County School System Superintendent or Assistant Superintendent at 229-467-2141.
2. Any employee with the Wilcox County School System (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 fraud. All reports can be made in confidence.
4. The Wilcox Board of Education shall conduct investigations of employees, providers, contractors, or vendors.
5. If necessary, the person reporting will be contacted for additional information.

6. Periodic communication through meetings should emphasize the responsibilities and channels to report suspected fraud.

CONFLICT OF INTEREST

Substantial state and federal requirements exist pertaining to standards of conduct and conflict of interest. It is the intent of the district for all employees to conduct all activities associated with procurements in compliance with the highest ethical standards, including the avoidance of any real or perceived conflict of interest. It is also the intent of the district to impose appropriate sanctions or disciplinary actions, including but not limited to termination and/or prosecution, for any employees who violate any of these requirements. A conflict of interest is defined as a situation that has the potential to undermine the impartiality of a person because of the possibility of a clash between the person's self-interest and professional interest or public interest.

The employees and consultants of the WCSS have the responsibility of administering the affairs of the system honestly and prudently, and exercising best care, skill, and judgement for the sole benefit of the system. No employee, officer, or agent may participate in selection, award, or administration of a contract supported by a federal award if he/she has a real or apparent conflict of interest. The interest of the organization must be the first priority in all decisions and actions.

Conflicts may arise in the relations of directors, officers, and management employees with any of the following third parties:

1. Persons and firms supplying goods and services
2. Persons and firms from whom the system leases property and equipment.
3. Competing or affinity organizations.
4. Donors and others supporters.
5. Agencies, organizations, and associations which affect the operations of the system.
6. Family members, friends, and other employees.

A conflicting interest may be defined as an interest, direct or indirect, with any persons or firms mentioned above. Such an interest might arise through:

1. Owning stock or holding debt or other proprietary interest in any third party dealing with the system.
2. Holding office, serving on a board, participating in management, or being otherwise employed (or formerly employed) with any third party dealing with the system.
3. Receiving remuneration for services with respect to individual transactions involving the system.
4. Using time, personnel, equipment, supplies, or good will for other than system/program approved activities, programs, and purposes.
5. Receiving personal gifts or loans from third parties dealing or competing with the system. Receipt of any gift is disapproved except gifts of a value less than \$25, which could not be refused without discourtesy. No personal gift of money should be accepted.

Nominal Items

There are situations in which the financial interest is not substantial or the gift is an unsolicited item of nominal value. These items are reasonable and not given in order to improperly influence business decisions. Items of nominal value are those items that are \$25 or less in value. Items may include a perishable item, meal, certificate, plaque, and token promotional item.

Violations

To receive federal funds, the district adheres to the GaDOE Conflict of Interest and Disclosure Policy. In addition to state requirements pertaining to standards of conduct and disclosure of conflict of interest, in accordance with 2 C.F.R. 200.13(c)(1) Wilcox County School System adheres to the federal standards with regard to selection, award, and administration of federal contracts. 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. The LEA will disclose in writing a potential conflict to federal awarding agency in accordance with applicable federal awarding agency policy. Any violation of federal criminal law involving fraud, bribery, or gratuity violations potentially affecting the federal award will be disclosed in writing in a timely manner. Any violations will be reported to the Superintendent and/or designee and if appropriate local authorities. The Superintendent and/or designee shall be responsible for initiating the investigation. If an investigation substantiates occurrence of a fraudulent activity, the Superintendent/designee shall issue a report to the appropriate personnel and to the Board of Education. Final disposition of the matter and any decision to file a criminal complaint or refer the matter to the appropriate law enforcement and/or regulatory agency for independent investigation shall be made in consultation with legal counsel.

Any misconduct could result in suspension, loss of employment, and any other consequences that are applicable by law.

DISPUTES (COMPLAINT PROCEDURES)

Any individual, organization, or agency (“complainant”) may file a complaint with the Wilcox County Schools (TUCS) if that individual, organization, or agency believes and alleges that TUCS is violating a federal statute or regulation that applies to a program under the Title I, Part A of the Elementary and Secondary Education Act of 1965 (ESEA). The complaint must allege a violation that occurred not more than one (1) year prior to the date the complaint is received, unless a longer period is reasonable because the violation is considered systemic or ongoing. To file a complaint that a violation of federal regulation has occurred with the Flexible Learning Program, an individual should follow the procedures:

COMPLAINT PROCEDURES

Filing a Complaint

A complaint must be made in writing and signed by the complainant using the Wilcox County School system’s *Federal Programs Complaint Form*. The complaint must include the following:

- A statement that Wilcox County School System has violated a requirement of a Federal statute or regulation that applies to an applicable program.
- The date on which the violation occurred.

- The facts on which the statement is based and the specific requirement allegedly violated (include citation to the Federal statute or regulation).
- A list of the names and telephone numbers of individuals who can provide additional information.
- Whether a complaint has been filed with any other government agency, and if so, which agency.
- Copies of all applicable documents supporting the complainant's position.

The complaint must be addressed to:

Wilcox County School System

Attn: Aleph Fore, Federal Programs Director

395 College Street West

Abbeville, Georgia 31001

Investigation of Complaint

Within ten (10) days of receipt of the complaint, Wilcox County School System will issue a Letter of Acknowledgement to the complainant that contains the following information:

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

If additional information or an investigation is necessary, WCSS will have sixty (60) days from receipt of the information to complete the investigation and issue a Letter of Findings. If the Letter of Findings indicates that a violation has been found, a timeline for corrective action will be included. The sixty (60) day timeline may be extended if exceptional circumstances occur. The Letter of Findings will be sent directly to the complainant, as well as the other parties involved.

Right of Appeal

If an individual, organization, or agency is aggrieved by the final decision of Wilcox County School System, that individual, organization, or agency has the right to request review of the decision by the Georgia Department of Education. For complaints filed pursuant to Section 9503 (20 U.S.C. 7883, complaint process for participation of private school children), a complainant may appeal to the Georgia Department of Education no later than thirty (30) days from the date on which the complainant receives the Letter of Findings. The appeal must be accompanied by a copy of the the Wilcox County School System's decision and include a complete statement of the reasons supporting the appeal.

COMPLAINT PROCEDURES

Any complaints issued as a result of federal programming will be asked to follow district complaint procedures policy. See 'Appendix A: Complaint Procedures'

SERVICES FOR PRIVATE SCHOOLS

Invitations for private schools to consult in participation in federal programs the following calendar year are sent in the fall, usually October, via ES4PS. A meeting is held to present information about the programs available to students in private schools. The federal programs director is invited to the meeting, which is complete with an agenda and sign in sheet. Upon receipt of the intent to participate form, which is provided to private school officials, a meeting is held to discuss plans and the required components of Title I services for private school students. Currently, Wilcox County School System is not serving any private schools.

If Wilcox County School System has a Private School to request funds the private school students would receive their proportional share of services via a per pupil allocations and required equitable services amounts. See Reservation of Funds. Eligibility criteria are used to determine the students who are most in need of services. Using assessment data provided by the private school, scores/levels are given ranges and point values are applied to those ranges.

When a private school determines that the school would like to participate in Title I or Title II, the district will determine the per pupil allocation for qualified students. The federal government has issued the following guidelines in determining the eligibility requirements for private schools desiring to participate in Title I 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 Department'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.

DOCUMENTATION FOR PARTICIPATION

In an effort to confirm the non-profit status of the private school, the LEA will request the the private school to provide a copy of their 501(c)3 status. If documentation is not provided, the LEA will utilize other methods to verify the current status of the private school.

IDENTIFICATION OF PARTICIPANTS

The LEA works closely with the private school to verify 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 student.

FINANCE

It is 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 LEA are the property of the LEA. At the time the private school no longer participates, the property will be returned to the LEA. An inventory will be maintained at the LEA. The private school will complete an inventory check twice per year at the request of the LEA.

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 days of filing and will be resolved within 60 days according to the process.

EVALUATION

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

EQUIPMENT

The private schools will follow the same procedure as the Wilcox County School System.

Timeline for Private Schools

Month	Activity
October	<ul style="list-style-type: none">● Send letter to request participation to private schools who work with students from Wilcox County School District for the following school year.
October	<ul style="list-style-type: none">● Gather data and consult with private school to determine services and possible participants● Begin to gather data for Eligible Participation Worksheet● Remind private school that any materials or purchases must be requisitioned and remains the property of Wilcox County School District
January - February	<ul style="list-style-type: none">● Hold Private School Meeting consultation
August of following year	<ul style="list-style-type: none">● Verify addresses of students attending private school that wishes to participate● Begin services● Note: If there is a third party vendor, see policy for third party vendor from GaDOE. Sign a letter that states the requirements on both parties to enter into agreement.● Visit site to determine services are rendered in accordance with federal requirements. Monitor all services regularly.
September-November	
January – May	<ul style="list-style-type: none">● Visit site to determine services are rendered in accordance with federal requirements.● Monitor all services regularly.● Plan for evaluation of services with a survey at the end of April.

FIDUCIARY RESPONSIBILITY

MAINTENANCE OF EFFORT

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. Documentation for MOE is only required for districts that do not meet the required maintenance of effort. The Federal Programs Director will pull the MOE information from the Consolidated Application each school year for documentation purposes.

IDEA- As part of the IDEA, Part B application approval process, applicants must comply with 34 CFR 300.203, Maintenance of Effort. The U.S. Department of Education determines compliance with this requirement by comparing actual state and local special education expenditures for the most recent fiscal year to actual expenditures made in the preceding fiscal year. The following exceptions can be made to MOE:

- Voluntary departure, by retirement or otherwise, or departure for just cause, of special education personnel or related service personnel.
- A decrease in enrollment of children with disabilities
- The termination of the obligation of an LEA, consistent with this part, to provide a program of special education to a particular child with a disability that is an exceptionality costly program, as determined by the state educational agency, because the child has left the program or system for some reason.
- The termination of costly expenditures for long term purchases such as acquisition of equipment or construction of school facilities.

When determining the maintenance of effort, the Georgia Department of Education checks the amount of state and local special education expenditures and then the per pupil amount. Compliance MOE expenditure reports for the current year are compared to the previous year’s expenditures. The district can use the above allowable exceptions to reduce the MOE amount. If a district is required to pay back funds, non-federal funds must be used.

COMPARABILITY OF SERVICES

All schools within the Wilcox County School System are Schoolwide Title I Schools. There are no overlapping grade spans. Therefore, it is not necessary to complete comparability of services.

ASSESSMENT SECURITY

Assessment Director: Nathan Gibbs

Wilcox County School System conducts the assessment program as required by federal and state law. It is in compliance with the Elementary and Secondary Act (ESEA) and Georgia law relative to student assessment and data reporting. Wilcox County School System interacts with state and federal agencies relative to the assessment program and accountability mandates. The Testing Director handles assessment documents and reports including secure test materials, individual student score reports, and school/district data reports in both paper and electronic formats. Wilcox County School System delivers training/guidance related to the assessment program, assessment data, and accountability mandates to all stakeholders.

Testing Procedures

1. System Testing Coordinator attends required meeting and participates in required webinars.
2. STC meets with school testing coordinators, principals, system special education director, and superintendent to share information received from meetings and webinars.
3. Copies of the Roles and Responsibilities from the testing manual are distributed to all that key personnel.
4. Calendar dates are set up for school personnel to receive security training.
5. STC presents the security meeting to examiners and proctors. At this time, all that attend must sign in and all duties and responsibilities are discussed at that time. All that are involved with testing are required to attend.
6. STC meets with all examiners and proctors that are involved with testing the special education and 504 plan students. Discussions occur of guidelines concerning any accommodations.
7. Because all personnel are required to attend at least one of these meetings, the STC has make-up dates established.
8. All documentation is kept on file.

MATERIALS

- a) All school testing coordinators must have a sign-in sheet for documentation of teacher and proctor participation.
- b) GaDOE Updates provided on each test being administered will be provided as a reference/resource for school testing coordinators.
- c) A District meeting held with school testing coordinators to indicate any special requirements from the district.
- d) School Coordinator's Manuals and Examiner's Manuals are usually available on the GaDOE's website. These manuals are used to assist in training. All manuals must be kept secure and accounted for after each use.
- e) School Coordinators should refer to the Roles/Responsibilities for all individuals being trained from the GaDOE Student Assessment Handbook including but not limited to: coordinator, principals, examiners, and proctors. Training covers each group's roles/responsibilities as documented on the sign-in sheets.

EXAMINERS AND PROCTORS SIGN ACKNOWLEDGING RESPONSIBILITIES FOR TESTING

- a) Arrangement of delivery of materials by the Testing Director to the school coordinator. The Test Director and School Test Coordinator check the shipment for accuracy of the delivery. Make checks of confirmations and notations of inaccuracies. The materials list is initialed and dated with both parties retaining a copy.
- b) In order to maintain the integrity of the assessment program and its results, security must be established and maintained. The responsibility of the assessment program at the school level rests with the principal and their designated school test coordinators.
- c) School Coordinators use the Student Assessment in Georgia Schools (PSC document) to discuss the testing ethics and consequences of violations. Examiner's sign and date a copy of these guidelines.

- d) School Coordinators use the Examiner “Must Do” page from the GaDOE’s Student Assessment Handbook as a part of the training at the school level.
- e) School Coordinators are trained in using the forms required from the GaDOE Student Assessment Handbook.
- f) School Coordinators are responsible for ensuring proper coding of test documents.
- g) School Coordinators are responsible for checking the accuracy of student information.
- h) School Coordinators are required to have test examiner’s sign materials in and out each day during test administration.
- i) Proctors are used when required. All test proctors are trained on their roles/responsibilities.
- j) Testing Procedures are clearly articulated to ensure a smooth and problem-free test administration. Schedules, groups and location assignments, and special directions are distributed and explained before testing administration by the School Test Coordinator.
- k) Accommodations are well documented by the Special Education Department. School coordinators carefully check to ensure students are provided the appropriate and accurate accommodations for each individual test.

COLLECTION OF MATERIALS

- a) Sign-in and Sign-out sheets are used to document who is responsible for each individual test booklet, the date, and number of test booklets received.
- b) Before testing documents are returned to the Testing Director.

TRAINING PLAN

I. Materials:

- a) All school testing coordinators must have a sign-in sheet for documentation of teacher and proctor participation.
- b) GaDOE Updates provided on each test being administered will be provided as a reference/resource for school testing coordinators.
- c) A District Meeting held with school testing coordinators to indicate any special requirements from the district.
- d) School Coordinator’s Manuals and Examiner’s Manuals are usually available on the GaDOE’s website. Please use these manuals to assist in training. All manuals must be kept secure and accounted for after each use.
- e) School Coordinators should refer to the Roles/Responsibilities for all individuals being trained from the GaDOE Student Assessment Handbook including but not limited to: coordinator, principals, examiners, and proctors. Training covers each group’s roles/responsibilities as documented on the sign-in sheets. Examiner’s and Proctors sign acknowledging responsibilities for testing.

II. Topics:

- a) Arrangement of delivery of materials by the Testing Director to the school coordinator. The Testing Director and School Test Coordinator check the shipment for accuracy of the delivery. Make checks of confirmations and notations of inaccuracies. The materials list is initialed and dated with both parties retaining a copy.
- b) In order to maintain the integrity of the assessment program and its results, security must be established and maintained. The responsibility of the assessment program at the school level rests with the principal and their designated school test coordinators.
- c) School Coordinators use the Student Assessment in Georgia Schools (PSC document) to discuss the testing ethics and consequences of violations. Examiner’s sign and date a copy of these guidelines.

- d) School Coordinators use the Examiner “Must Do” page from the GaDOE’s Student Assessment Handbook as a part of the training at the school level.
- e) School Coordinators are trained in using the forms required from the GaDOE Student Assessment Handbook.
- f) School Coordinators are responsible for ensuring proper coding of test documents.
- g) School Coordinators are responsible for checking the accuracy of student information.
- h) School Coordinators are required to have test examiner’s sign materials in and out each day during test administration.
- i) Proctors are used when required. All test proctors are trained on their roles/responsibilities.
- j) Testing Procedures are clearly articulated to ensure a smooth and problem-free test administration. Schedules, groups and location assignments, and special directions are distributed and explained before testing administration by the School Test Coordinator.
- k) Accommodations are well documented by the Special Education Department. School coordinators carefully check to ensure students are provided the appropriate and accurate accommodations for each individual test.

III. Collection of Materials

- a) Sign-in and Sign-out sheets are used to document who is responsible for each individual test booklet, the date, and number of test booklets received.
- b) Before testing documents are returned to the Testing Director, the school coordinator carefully accounts for all materials.
- c) During the document count, the school coordinator checks for complete information (Form Numbers, Labels, Names...) on each answer document.
- d) Once the materials are re-counted by the Testing Director and the School Testing Coordinator, the materials are packaged for delivery.
- e) Principal Certification Sheets are required on all standardized tests. This document must be returned at the time of delivery of the testing materials.

Assessment Protocol

Assessment Self-Reflection

Teachers complete Assessment Self-Reflection to ensure a variety of assessments are provided to monitor and inform instruction.

Item Analysis

Department chairs participate in a guided practice of how to conduct an item analysis of unit assessments to ensure assessment items align to the intent and rigor of the standard\learning target.

Department Chairs modeled the process and provide content teachers guidance on conducting an item analysis of each unit assessment to ensure assessments items align to the intent and rigor of the standard\learning target.

Disaggregating the Data

Department Chairs participate in a guided practice on how to utilize technology as a tool to disaggregate unit assessment data to determine student mastery and inform instruction.

Each department will select a technology tool for teachers to use to disaggregate unit assessment data to determine mastery of standards/learning target and inform instruction.

Teachers utilize data to determine students who did not master learning targets/standards and develop a plan of action to provide interventions.

Report of Data Findings

Communicate learning targets/standards that were not mastered and the plan of action to provide interventions to identified students.

The assessment protocol will be followed each time a unit assessment is administered.

SUPPLEMENT NOT SUPPLANT

FISCAL REQUIREMENTS

The Elementary and Secondary Education Act of 1965 (ESEA) provides several fiscal requirements that are applicable to Title I, Part A funds. Local educational agencies (LEAs) must maintain the financial effort previously provided with State and local funds to Title I schools. LEAs may not use Title I funds to **supplant** or replace state or local funds. LEAs must provide services to Title I schools that are comparable to those of non-Title I schools.

PRE-APPROVAL OF PURCHASES

The Wilcox County School System has procedures in place for Title purchases to maintain internal controls and to avoid fraud, waste, and abuse of federal funds. All purchases must be pre-approved prior to an order being placed. This includes orders from RESA and other companies where orders can be placed online. **Any contract award at or above the \$25,000 threshold must not be made to parties listed on the government-wide exclusions in the System for Award Management (SAM).**

EXPENDITURE OF FUNDS

Upon receiving allocations, school staff will meet with district personnel during regular building administration meetings to develop a budget for the use of federal funds. Once complete the budget is sent to the federal programs director. Upon completion of the budgeting approval process with school and system title funds, the budget will be entered into the consolidated application system. Once approved at the state level, the Director of Finance will then enter the budget into the financial system software. The Director of Finance will review the budget entered into the financial system against the consolidated application for accuracy and allowable use of funds. Any discrepancies between the entered budget in the local system and the consolidated application must be corrected prior to spending and draw-down of funds related to spending.

Spending will follow the pre-approval process throughout the spending period. The Director of Finance will generate monthly reports from the Finance Department. Monthly reports will be analyzed for expenditures against budgeted funds. The Federal Programs Director will compare detailed monthly expenditure reports to the consolidated application monthly with the Director of Finance to ensure that expenditures are in accordance with the approved consolidated application.

REASONABLE AND NECESSARY USE OF FUNDS

Federal Programs/IDEA expenditure of funds must meet the clause of “reasonable and necessary.” When considering a purchase with federal funds, ask:

- (a) Do I really need this?
- (b) Do I need to spend these funds to meet the purposes and needs of the program?
- (c) Do I have the capacity to use what I am purchasing?
- (d) Did I pay a fair rate and can I prove it?
- (e) Would I be comfortable defending this purchase?
- (f) Is the proposed cost consistent with the underlying needs of the program?

ALLOWABLE AND UNALLOWABLE COSTS

Any purchases made with Federal funds must follow the guidelines for allowable costs. Wilcox County School System Title Programs follow guidelines as detailed in EDGAR and the GaDOE guidance. Federal Programs purchases will be aligned with the finding of the Annual Needs assessment and areas of need identified in the School Wide Plan. Federal Programs purchases will also adhere to any memos, letters, and/or communication regarding allowable/unallowable purchases. The Federal Programs Director will direct any questionable expense to the Area Program Specialist for further clarification.

Federal Programs funds cannot be used to purchase incentives for students, teachers, or participation in professional learning activities. Food for parent involvement must be considered “light refreshment.” “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” does 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 you can fund a snack for a workshop teaching parents a specific skill, but could not give snacks to parents volunteering.

The Federal Programs/IDEA Director prepares a written report of the preliminary Federal Programs budgets once this information becomes available from GaDOE. The report is submitted to the superintendent, and the superintendent’s cabinet. The Federal Programs/IDEA Director presents this information to the Board for approval. All approved Consolidated Application budgets for all federal programs will be presented to the Board by the Federal Programs/IDEA Director once they are approved by the GaDOE. Copies of the meeting agenda, minutes, materials presented and approval will be maintained in the Federal Programs director’s office.

All federal grant budgets and the CLIP must be adopted by the local Board after GaDOE approves the final submitted budget application. Additionally, any significant amendments must be adopted by the BOE. Each federal program must be identified and budget details must be listed.

BUDGET APPROVAL PROCESS

- Funding amounts are approved by the GaDOE Board of Education
- Award letters are sent to districts
- Schools are given the allocated dollar amount for budgeting
- The budget is entered into the GaDOE Consolidated Application (electronic grant application process) by the program coordinator or authorized staff
- The budget is approved by the program coordinator

- The budget is approved by the superintendent (budget may be rejected at this level and requests for revisions may be made)
- The budget is approved by the program specialist at the GaDOE (budget may be rejected at this level and requests for revisions may be made)
- The budget amount is approved by GaDOE Accounting
- The budget is adopted by the district BOE

PERIODIC CERTIFICATIONS

The LEA 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/or the school administrator. After-the-fact periodic certifications will be done following the conclusion of the first semester (January) and the conclusion of the second semester (May). The After-the-Fact periodic certifications will be maintained at the Central Office in the Federal Programs office.

Permanent Schedules: A permanent schedule is required to be submitted along with periodic certifications of teachers or paraprofessionals who are being paid with federal funds. Title I teacher schedules and paraprofessional schedules (showing paraprofessionals that are under the direct supervision of a highly qualified teacher) are signed and dated monthly by the employee and supervisor documenting allowable duties and submitted to the Program Director.

Time sheets: A time sheet is completed by individuals providing additional or contracted services. The sheet is approved and signed by the principal, Program Director who forwards it for approval by the Financial Director and then to accounts payable for payment.

Time Logs: Individuals who are paid less than 100% from Federal Programs and whose schedule changes from day to day complete and submit a monthly time log depicting the amount of time spent on Federal Programs duties matched, at minimum, the portion of their salary funded through the Federal Program. Monthly time logs are collected from split-funded personnel. The logs identify the time and duties funded by all fund sources, are reconciled quarterly, signed, and dated monthly. These personnel are instructed to monitor their own time throughout the month and the Program Director approves the monthly time log via a signature and date. (§200.303e)

Budgets as well as schedules, travel logs, and time logs may be used to ensure payroll charges to **Title I, Part A, Title I-Part C Title II-Part A, Federal programs director, Title IV-Part B, Title VI-Part B, IDEA, SIG, ARP, CARES, and other federal programs** are correct. Full-time and part-time personnel funded with these funds make out schedules to indicate the breakdown of their activities during the day. Federal Programs Director keeps an updated copy of the schedules which are forwarded to the Financial Director, to ensure that funds are charged properly.

Contracted personnel (recruiter) submit a time log and travel log for allowable charges to the Federal Program Director for approval.

Indirect Costs are charged to Federal Programs when applicable.

SPLIT-FUNDED PERSONNEL

Wilcox County School System utilizes split-funded personnel paid with a combination of Title I and state/local funds. Wilcox County School System complies with all EDGAR regulations as it relates to split-funding procedures. Any employee being paid with Title funds or a combination of funds will be required to complete monthly time sheets to verify the appropriate work under federal program regulations.

Split-funded personnel are required to maintain personnel activity reports also known as a time log delineating the specific Title I and non-Title I duties. The format used is the time log form found on the GaDOE website. Forms are signed monthly by the immediate supervisor of the staff member. The time log (PAR) is filled out after the end of each month and submitted to the immediate supervisor for review and signature. Supporting documentation (source documentation) is kept by the person owning the time log. This source documentation includes calendar entries, etc. Signed forms are maintained in the Federal Programs office.

Employees may receive hazard pay for a national or local emergency or to perform critical services. Instances when this may happen may include a pandemic or a natural disaster. Employees will be compensated for fully completing an objective from a supervisor related to the aforementioned conditions.

CAPITAL EXPENSE FUNDS

The Wilcox School System does not use Title funds to budget items under object code 700 (capital expense).

CONSULTANTS, CONTRACTS, PURCHASED SERVICES FOR TITLE I FUNDS

Contracts are required for all consultants and purchased services. Agreements are entered into between the Wilcox County School System and the consultant. Each contract contains the following:

- Contracts are generated by Federal Programs Director
- Specific duties are specifically spelled out for each contract.
- The consultant must also submit to be fingerprinted if they are working with students.
- The contract includes the number of hours to work and the rate of pay.
- Principals must submit time logs based on the payroll deadlines from the Payroll Department.

Each contract is signed by the following: Contractor, Principal, and Federal Programs Director. The Federal Programs Director provides oversight in ensuring that all contractors' work is complete. Artifacts, daily sign in sheets, and completion of all workshops are kept on file in the Title I office. The Federal Programs Director signs off on all invoices/contracts prior to the issuance of payment for services. These contracts must be maintained and kept in the Title I files.

Period of Performance Flexibility

The intent of federal funds is to benefit students, teachers, and school leaders in that fiscal year through the grant period as indicated on the Grant Award Notice (GAN). For purchases that cross grant periods (software, computers, equipment), the system is provided flexibility from GADOE as follows:

- Purchases: Purchases may extend beyond one year to take advantage of cost reductions only if the students, teachers, and school leaders in the current fiscal year receive benefit from the purchase.
- Multiple year contracts will include an opt out clause if Title I funds are no longer available, the contract will be void.
- Leases and Licenses: If instructional software subscriptions are purchased after January, the WCSS must provide an explanation within the budget description indicating how students in the current fiscal year will benefit from the purchase. Professional learning and/or recruitment software and/or licensing do not require an explanation within the budget description.
- Professional development registration: To maximize cost efficiency, the WCSS may take advantage of early bird professional development registration where early bird registration occurs in the original grant period and the actual professional development occurs in the carryover period. Supporting documentation should be kept on file.

The WCSS will ensure that all purchases align to the grant period as much as possible to reduce the risk of non-compliance. Additionally, in the planning process, the WCSS will weigh all options and ensure the students and staff are receiving the maximum benefit of the federal award.

WRITTEN TRAVEL POLICY

200.474; 200.475 OCGA 50-5b-5; OCGA 20-2-167(b); SBOE 160-5-2-23; FMGLUA Chapter 40

Wilcox County School System follows the State Travel Policy found at <https://sao.georgia.gov/travel/state-travelpolicy>. All travel costs must be reasonable and consistent with written travel policy/or follow GSA 48 CFR 31.205-46a. All requests for transportation, lodging, subsistence, and related items will be approved at the discretion of the federal programs director with final approval from the superintendent. All expenses are reimbursed to the participant after the approved activity.

The following steps are used to document registration and travel expenditures.

- The employee or principal receives permission to attend a Federally-funded activity from the building Principal and/or Federal Programs Director using a Professional Leave Request form. Each Professional Leave Request includes the name and position of the staff member and an explanation of the need for participation in the approved funded activity (Ex. conference, professional learning event).
- After attending the activity, the employee completes a travel expense form and submits to the Principal and Federal Programs Director with all required supporting documentation attached. (Copy of meeting agenda, Sign-in sheets if applicable, Map-Quest report of mileage, hotel receipts). This form adheres to the state mandated amounts for meals and mileage. The recipient must complete the form with beginning gas mileage and ending gas mileage and cannot exceed the allowable amounts for meals. If the travel is overnight, the recipient must obtain the tax free forms from the county office prior to paying for the hotel/motel and obtain a receipt for the payment. The same forms are required for conferences and must fall within appropriate cost guidelines.
- The Federal Programs Director reviews all travel costs to ensure the costs are reasonable and consistent with written travel policies and follow GSA 48CFR 31.205-46a. Regulations. When approved, the Federal Programs Director submits approved travel forms to the Finance Department for payment by the 10th of each month.
- Monthly the Financial Director completes the DE0147 for the drawdown of funds. The Superintendent has final approval of the DE0147 and ensures appropriate funds are being drawn down.

MILEAGE: Auditors require that all travel/expense forms be filled out completely. Departure and arrival times must be included, along with the reason for the trip (the title of the class or workshop attended). FY22, reimbursement for transportation expense will be .575 cents per mile for the actual mileage traveled in the

performance of official duties. For the normal workweek, the point of departure will be either the employee's residence or headquarters, whichever is nearer to the destination point. During weekends and holidays, employees should use the actual point of departure to calculate travel mileage. Actual odometer readings must be reported. However, any personal mileage must be excluded in determining the mileage for reimbursement.

LODGING: Employees traveling overnight are responsible for obtaining the most reasonable lodging rates. The accounts payable department assists employees with reservations when requested. Employees should make reservations in advance, utilize minimum rate accommodations and avoid "deluxe" hotels and motels. Obtain corporate/government rates whenever possible. Hotel/Motel Tax Exempt Forms should be used and can be picked up at the Central Office.

MEALS: The cost of meals normally eaten before departure or after return from travel status is not reimbursable. Generally, lunch is not reimbursable unless the employee is out overnight. Reimbursement will not be allowed for breakfast unless employees depart prior to 6:30 a.m. Generally, employees will not be reimbursed for the evening meal unless they return after 7:30 p.m. Employees will be reimbursed for the evening meal provided the employee was away from home on the work assignment for more than 13 hours. Lunch is not reimbursable except when the meal is an integral part of the conference or a scheduled meeting, the employee is traveling prior to 6:30 a.m. and returns after 7:30 p.m., or the employee is away from home or headquarters on a work assignment for more than 13 hours. Lunch is always reimbursable if the employee leaves before 11:00 a.m. for an overnight trip or returns after 1:00 p.m. from an overnight trip. Employees traveling overnight may be reimbursed for the actual cost of meals, within the maximum limits established in these travel regulations. Limits are based on the length of day, which an employee is officially on travel status. The following limits apply to meal reimbursements: **NORMAL COST AREAS:** Breakfast - \$6.00 Lunch - \$7.00 Dinner - \$15.00 Daily Max. - \$28.00 **HIGH COST AREAS:** Breakfast - \$7.00 Lunch - \$9.00 Dinner - \$20.00 Daily Max. - \$36.00 *High cost areas are limited to the following counties: Chatham, Clarke, Cobb, Dekalb, Fulton, Glynn, and Richmond

MISCELLANEOUS EXPENSE: Personal calls made while on travel status are not reimbursable. Expenditures for valet services are personal cost and are not reimbursable. Receipts are required for all miscellaneous expenses such as parking, bridge tolls and porters.

SUSPENSION AND DEBARMENT CFR 85.110; 2 CFR 180.220; 2 CFR 200.327

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Grant requirements state non-Federal entities are prohibited from contracting with or making sub-awards under covered transactions to parties that are suspended or debarred or whose principals are suspended or debarred. Covered transactions include those procurement contracts for goods and services awarded under a non-procurement transaction that are expected to equal or exceed \$25,000.00. Wilcox County School System utilizes the System for Award Management (SAM) to search vendors to check for suspended or debarred parties. The Federal Program Director will check (SAM) website, <https://www.sam.gov/portal/SAM> prior to approving any purchase in excess of \$25,000 to ensure the vendor is not on the list of suspension and debarment. The Federal Programs Director keeps a list of all vendors and signs and dates it the day the check was performed.

Each summer the Federal Programs Director gets a list of the previous year's vendors who were paid \$25,000 or more from the Finance Director and checks the vendor list against the suspension and debarment list on Sam's. Signed and dated screenshots (by the Federal Programs Director) are filed as documentation.

SUPPLEMENT VERSUS SUPPLANT

Supplement not Supplant: District federal programs expenditures are supplemental to those provided to schools from state and local funds. Federal funds are only used to supplement and, to the extent practical, 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 the federal programs. The grant administrators ensure that supplemental services are provided by reviewing all expenditures for pre-approval.

Title I, Part A: Under Title I, Part A at the school level, the LEA meets the supplement not supplant provision through the implementation of the Resource Allocation Methodology/Plan (RAM/P). Supplement, not supplant for Title I, Part A ensures that:

- The local educational agency shall use federal funds received under Title I, Part A to supplement the funds that would, in the absence of such federal funds, be made available from state and local sources for the education of students participating in programs assisted under Title I, Part A and not to supplant such funds.
- A local educational agency shall demonstrate that the methodology used to allocate state and local funds to each school receiving assistance under Title I ensures that such school receives all of the state and local funds it would otherwise receive if it were not receiving assistance under Title I, Part A.

WCSS may exclude from supplanting determinations supplemental non-Federal funds expended in any school for programs that meet the intent and purposes of Title I, Part A. A program meets the intent and purposes of Title I, Part A if it either:

- Is implemented in a school with at least 40 percent poverty;
- Is designed to promote schoolwide reform and upgrade the entire educational operation of the school;
- Is designed to meet the educational needs of all students in the school, particularly those who are not meeting state standards; and
- Uses the state's assessment system to review the effectiveness of the program;

OR

- Serves only students who are failing, or most at risk of failing, to meet state standards;
- Provides supplementary services to participating students designed to improve their achievement;
- Uses the state's assessment system to review the effectiveness of the program.

Other Programs:

- Title I, Part C: Funds provided under this part shall be used to address the needs of migratory children that are not addressed by services available from other federal or non-federal programs, except that migratory children who are eligible to receive services under part A may receive those services through funds provided under that part, or through funds under this part that remain after the agency addresses the needs.

- Title II, Part A: Funds made available under this title shall be used to supplement, and not supplant, non-Federal funds that would otherwise be used for activities authorized under this title.

o Funds may be used only to supplement educational program activities provided with state and local funds. WCSS may not use Title II, Part A funds to pay for activities that, in the absence of these funds, would be provided with state and local funds.

o Title II, Part A funds may be used to fund only the professional development activities that supplement those mandated locally or by the state, and can supplement those discretionary professional development activities that WCSS would fund in the absence of other local and/or state funding sources.

o The Director of Federal Programs will consider the following questions when determining whether or not an expenditure would create a presumption of supplanting:

☐ Is the program or activity that the LEA wants to fund required under state, local, or another federal law? If it is, then it is supplanting.

☐ Were state or local funds used in the past year to pay for the program or activity? If they were, it is supplanting.

The presumptions may be rebutted if WCSS demonstrates that it would not have provided the services in question with non-federal funds had the federal funds not been available.

- Federal programs director, Part A: Funds made available under this subpart shall be used to supplement the level of federal, state, and local public funds that, in the absence of such availability, would have been expended for programs for English learners and immigrant children and youth and in no case to supplant such federal, state, and local public funds.

- Title IV, Part A: Funds made available under this subpart shall be used to supplement, and not supplant, non-federal funds that would otherwise be used for activities authorized under this subpart.

- Title V, Part B: Funds made available under this subpart shall be used to supplement, and not supplant, non-federal funds that would otherwise be used for activities authorized under this subpart.

- Title IX, Part A: Funds made available under this subpart shall be used to supplement, and not supplant, non-federal funds that would otherwise be used for activities authorized under this subpart.

- IDEA: Funds must be used to supplement state, local, and other federal funds and not to supplant those funds.

Supplanting is presumed to have occurred if federal funds are used to provide services that (not applicable to Title I, Part A):

- Were required to be made available under other federal, state, or local laws.

- Were provided with non-federal funds in prior years.

- Were provided to federal program eligible children, if those same services are provided with non-federal funds to non-federal program eligible children.

If the WCSS plans to rebut a supplanting determination by demonstrating it would not have provided services had the federal funds not been available, the following documentation will be maintained by the grant administrators:

- Fiscal documentation to confirm that, in the absence of Title I, Part A, the WCSS would have eliminated the services in question.

- Programmatic documentation to confirm that, in the absence of Title I, Part A, the WCSS would have eliminated the services in question.

INTERNAL CONTROLS, EXPENDITURES, INVENTORY, DRAWDOWNS, COST PRINCIPLES-ALL PROGRAMS

INVENTORY

2 CFR 200.62(c); 2 CFR 200.313(d)

All Title I schools are required to maintain an active inventory of all items purchased with federal funds. Wilcox County School Systems uses an online inventory system to keep track of items with a life expectancy of one year or more that are purchased with Federal, state, or local funds. This includes items purchased for the central office, and for the district's schools. Inventory items are marked with a label which has the fiscal year and Program Code. The label is placed on the equipment in a location easy to see. Inventory is updated consistently throughout the year and a copy of the inventory report is kept on file in the Federal Director's office and at the school.

Inventory Management

Federal Programs inventory is maintained on an online portal that can produce a spreadsheet by school and District office that identifies the item, date of purchase, location, serial number, vendor, unit cost, funding source, use, condition, and disposition. All equipment is assigned a location within the school (room number) or district office upon receipt of the product. Upon receipt, the school technology specialist or district technology director logs the following information into the inventory software:

- Cost per item
- FAIN number
- Program (Source of Funding)
- Date of Purchase
- Vendor
- Serial Number
- Location
- Use
- Condition of Property (updated annually)
- Disposition Date and Reason (when applicable)

The Federal Programs Director, Technology Director, or designee inventories items each Fall/Spring. Two student workers hired specifically to assist with technology are constantly checking inventory locations, labels, and condition of equipment. Concerns are noted in the online inventory software and are communicated to the school and district technology staff at weekly technology meetings.

Any equipment, materials and/or supplies purchased with federal funds are considered solely for the use of that program. In the event the equipment is no longer usable, materials and equipment will be disposed of following the District disposal procedures. Equipment that is damaged, lost, or stolen will be reported to the Federal Programs Director. Damaged and inoperable equipment will be returned to each school's Media Center and noted in the inventory as being broken, stolen, etc. A police report will be required for stolen property. Lost equipment will be verified by the principal and noted in the inventory. Disposed items must remain on inventory for a period of three years.

Disseminating Inventory Procedures

Equipment Timeline

- **July**
 - Administrative meeting - review inventory procedures
 - The Federal Programs Director and Technology Director updates the inventory for the upcoming school year

- **August-November**
 - Physical inventories conducted for all items listed on the schools’ or departments’ inventory logs

Offsite use of Equipment

Offsite use of Title I equipment is allowed for students and staff employed by the school system. During the COVID pandemic and at other times virtual learning is required, students are allowed to check out Chromebooks for virtual instruction.

If students check out equipment to take offsite for any purpose, a contract is completed between the school and the parent. All equipment must be returned to the location listed on the inventory at the conclusion of each school term.

Theft of Equipment or Technology Funded by Federal Funds

In the event Federal Programs equipment or technology is stolen and/or lost the following procedure will be followed:

- File an incident report with the police and/or School Resource Officer (SRO).
- Attach the incident report to the Technology Disposal Form and send to the Federal Programs Director’s office.
- Make corrections to the Federal Programs inventory and maintain notation of the incident for 3 years.
- Send the updated inventory to the Federal Program Director’s office. The principal or other design must sign and date the inventory spreadsheet.

Consultants, Contracts, Purchased Services for Federal Funds

Contracts are required for all consultants and purchased services. Agreements are entered into between the District and the consultant. Each contract contains the following:

- Contracts are generated by Federal Programs Director
- Specific duties are specifically spelled out for each contract.
- The person must also submit to be fingerprinted if they are working with students.
- The contract includes the number of hours to work and the rate of pay.
- The timeframe of a contract cannot extend beyond the current grant period.
- Copies of signed contracts must be maintained on file.

- The Federal Programs Director or designee must verify performance deliverables, for example sign in sheets for professional learning activities.

PROCUREMENT

The district's objective is to purchase the best products, materials, and services at the lowest practical prices within relevant statutes and procedures. It is important to acquire goods and services for the best price through fair and open competition to protect the interest of the local, state, and federal government while still maintaining the desired quality and minimizing exposure to misuse of funds. *To the greatest extent practicable WCSD provides a preference for the purchase of goods and materials produced in the US.* (CFR 200.322)

Acquisition of Federally Funded Services or Equipment

1. Software packages, program models, and other instructional support packages will be evaluated by a committee led by the Superintendent or Federal Programs Director prior to purchase to ascertain that the purchase meets needs identified in the District's/School's needs assessment.
2. All purchases must be preapproved and aligned with the District's CLIP and/or the School's SWP and SIP. (Items not budgeted will not be approved)
3. All technology items must meet requirements of the Technology Department's Supervisor.
4. Prior to delivering the items to the schools, the Technology Department will:
 - a. Inventory all items
 - b. Items will be prepared for use (imaged, tested for issues, labeled, etc.)
 - c. Ensure computer technicians setup the equipment in the designated buildings and rooms as indicated on the inventory.

Full and Open Competition

All procurement transactions paid with federal funds are conducted in a manner providing full and open competition. In an environment of full and open competition, no proposer or bidder has a competitive advantage over another. All potential proposers or bidders must be provided the same information and have the same opportunity to submit a bid or proposal. The district does not engage in the following situations that may restrict full and open competition, including but not limited to:

- * placing unreasonable requirements on business in order for them to qualify to do business;
- * requiring unnecessary experience and excessive bonding;
- * noncompetitive pricing practices between business or between affiliated companies;
- * noncompetitive contracts to consultants that are on retainer contracts;
- * organizational conflicts of interest;
- * specifying a brand name product instead of allowing an equal product to be offered and describing the performance or other relevant requirements of the procurement; and
- * any arbitrary action in the procurement process.

The district Financial Specialist is responsible for communicating this information and ensuring that no limits to open competition are created.

The district conducts federal procurement in a manner that prohibits imposed state or local geographical preferences in the evaluation of bids or proposals. The district takes necessary affirmative steps to assure that underutilized businesses are used when possible.

Solicitation

All solicitation will incorporate a clear and accurate description of the technical requirements for the materials, products, or service to be procured. Such description will not, in competitive procurements, contain features which unduly restrict competition. **To the greatest extent practicable the Wilcox County School District provides a preference for the purchase of goods and materials produced in the U.S. (CFR 200.322)**

Procedures for Purchasing and Monitoring of Funds

Each budget, after prepared at the school level, is reviewed by the appropriate Federal Program Director, revised by school personnel, if necessary, and approved by the Federal Program Director. Once the necessary compilation is made by school and the budget is submitted and approved by the state, each school's office manager enters requisitions (as submitted by the principal) via purchase orders.

All Federal Programs purchase orders (PO) are routed to the appropriate director, who verifies alignment to the approved federal program budget to and approves or denies the request. Purchases are granted if in the approved federal program budget. If denied it is routed back to the principal with recommendations via email or call log. If approved, the requisition is reviewed for account number logic by the Federal Program Director/Coordinator. If approved, the PO is signed by the superintendent and sent to the accounts payable (A/P) department. A/P personnel then return a colored copy of the PO to the appropriate Federal Program director/Coordinator and the school principal. The approved PO is then faxed (or mailed) to the vendor.

When the invoice is received in the central office from the vendor, it is sent to A/P personnel that matches the invoice to the PO. All Title invoices are sent to the appropriate director for written approval and verification through each director and school principal that merchandise was received. Upon federal program director written approval and verification of goods received vendor check runs are completed. After the approval is obtained, A/P personnel enter the amount as a claim. A/P personnel then process a check-run every Thursday (checks are usually written every Thursday). Each check run is pre-approved by Director of Finance. The checks are run on blank stock and then pulled from printer and signed by the Board of Education Chairperson and superintendent. The checks are then processed for mailing. Wilcox County uses the indirect cost calculation, chart of accounts, and Grants Accounting Online Reporting System (GAORS) provided by GADOE to plan, budget, expend, and draw funds. School and district level budgets are also built based upon the required set asides and amounts for neglected students, private school participation, homeless, parent involvement, professional learning for highly qualified teachers, and the other general provisions as required (public choice and supplemental services).

Methods for Procuring with Federal Funds

There are methods that must be used when making purchases with federal funds. In some cases, these federal methods are less restrictive than the state and local requirements, if so then the local or state requirements must be followed. In all cases, the more restrictive requirements must be followed when making purchases with federal funds.

-Micro-Purchases (Purchases up to \$10,000). (200.67 Micro-Purchase). Micro Purchase is a purchase of supplies or services using normal acquisition procedures, the aggregate amount does not exceed \$10,000. To

the extent practicable, the district distributes micro purchases equitably among qualified suppliers. Micro-purchases may be awarded without soliciting competitive quotations if non-federal entity considers the cost reasonable.

-Small Purchases (Small purchase procedures (§200.320) are those relatively simple and informal procurement methods for securing services, supplies, or other property that do not cost more than the simplified acquisition threshold (§200.88) of \$250,000.00. If small purchase procedures are used, price or rate quotations must be obtained from an adequate number (at least 2) of qualified sources. 3. Procurement by sealed bids (formal advertising) for purchases greater than \$250,000.00.

Purchases of \$250,000 or More in the Aggregate. Georgia Code 36-91-20 and 36-91-21 are followed for purchases of \$250,000 or more. Also, the Georgia Department of Education guidelines are adhered to. One of the three following methods must be used, for purchases above \$250,000 when using federal funds: sealed bids; competitive proposals; or non-competitive proposals (sole source). Also, the WCBOE reviews and approves purchases of \$250,000 or more.

Sealed Bids

Bids are publicly solicited and a firm fixed price contract is awarded to the responsible bidder whose bid, conforming with all the material terms and conditions of the invitations for bids, is the lowest in price. A complete, adequate, and realistic specifications or purchase description is available; two or more responsible bidders are willing and able to compete effectively for the business; and the procurement lends itself to a firm fixed-price contract and the selection of the successful bidder can be made principally on the basis of price. The invitation for bids must be publicly advertised. All bids will be opened at the time and place prescribed in the invitation for bids. The bids must be opened publicly. Where specified in bidding documents, factors such as discounts, transportation cost, and life cycle costs must be considered in determining which bid is the lowest (200.319). Any and all bids may be rejected if there is sound documented reason.

Competitive Proposals

Competitive Proposals: Procurement by competitive proposals is normally conducted with more than one source submitting an offer and either a fixed price or cost-reimbursement type contract is awarded. It is generally used when conditions are not appropriate for the use of sealed bids.

For competitive proposals, the following requirements apply:

- Requests for proposals must be publicized and identify all evaluation factors and their relative importance. Any response to publicized requests for proposals must be considered to the maximum extent practical.
- Proposals must be solicited from an adequate number of qualified sources.
- The system must have a written method for conducting technical evaluations of the proposals received and for selecting recipients.
- Contracts must be awarded to the responsible firm whose proposal is most advantageous to the program with price and other factors considered.

Noncompetitive Proposals (Sole Sourcing)

Procurement by noncompetitive proposals (sole source) is conducted through solicitation of a proposal from only one source and may be used only when one or more of the following circumstances apply:

- The aggregate dollar amount does not exceed the micro-purchase threshold
- The item is available only from a single source.

- The public emergency for the requirement will not permit a delay resulting from competitive solicitation.
 - The federal awarding agency or pass-through entity expressly authorizes noncompetitive proposals in response to a written request from the system.
 - After solicitation of a number of sources, competition is determined inadequate.
- Procurement by sole source should be limited.

Cost/Price Analysis for Federal Procurements in Excess of \$150,000

The district will make independent estimates of the goods and services being procured before receiving bids or proposals to get an estimate of how the goods and services are valued in the current market. To accomplish this, after bids and proposals are received, but before awarding a contract, the district will conduct either a price analysis or cost analysis, depending on the type of contract, in connection with every procurement with federal funds in excess of \$150,000.

Cost Analysis Non-competitive Contracts: The cost analysis involves a review of proposed costs by expense category, which includes an analysis of whether the costs are allowable, allocable, reasonable, and necessary to carry out the contracted services. The cost analysis must be used for all non-competitive contracts, including sole source. When performing a cost analysis, the Financial Specialist negotiates a profit as a separate element of the price. To establish a fair and reasonable profit, consideration is given to the complexity of the work to be performed, the risk borne by the contractor, the contractor's investment, the amount of subcontracting, the quality of its record of past performance, and industry profit rates in the surrounding geographical area for similar work.

Price Analysis Competitive Contracts: The price analysis determines if the lump sum price is fair and reasonable based on current market value for comparable products or services. In general, the price analysis can only be used with competitive contracts and is usually used with fixed price contracts. Total cost must be reasonable in comparison to current market value for comparable products and services.

Equipment Disposition: no longer needed for original intent, loss, damage or theft

The District uses adequate safeguards to prevent loss, damage, or theft of the equipment. Control features include:

- Locks (for particularly valuable or vulnerable items)
- Access controls to storage buildings limit entry by unauthorized personnel
- Logs or sign-in sheets for certain items of property; for example, iPads, laptops, cameras, projectors
- Promptly entering items received into the inventory management system

Loss, damage and/or theft of equipment purchased with Federal funds is reported to the district level Federal Programs director.

Documentation includes notification of loss, damage or theft of equipment and, if appropriate, any police reports.

When property purchased with federal funds becomes obsolete, unusable or surplus to School District needs, or is otherwise not in the school's best economic interests to retain, it may be disposed of by sealed bids, public auction or other means as practical or cost effective.

The sale, exchange or disposal of real property shall be approved by the Superintendent of Schools and reflected on the inventory.

Inventory records are maintained until equipment is disposed of or transferred to another federal program. Records for real property and equipment acquired with federal funds are retained for three years after transfer or final disposition. Disposition/transfer will occur at the close of the federal program/school, if equipment is no longer needed for original intent and transferred to another federal program, or in the event the equipment is no longer usable. Equipment that is damaged, lost, or stolen will be reported to the Federal Programs Director. Damaged and inoperable equipment will be returned to the Federal Programs Office. The condition will be noted on the inventory spreadsheet. Records for items identified for disposition are maintained on the inventory for three years before final removal. Once disposed of, the Federal Programs Office will be informed and the appropriate notation will be made in the inventory records and documentation retained. A police report will be required for stolen property. Lost equipment will be verified by the principal and noted in the inventory. In the event that a federal program is no longer available, federally purchased equipment will be transferred equitably to the inventory of another functioning federal program.

Also, equipment with an acquisition cost of less than \$5,000 which is at least five years old and no longer effective may be purged or transferred to another location. This includes equipment for schools that have closed.

All sales of real property shall be approved by the Superintendent prior to the sale of such property; no private sales shall be made. The highest price possible will be sought. Sales will be publicized in advance of the sale date. All proceeds from sales shall be deposited in the general fund or some appropriate centralized fund.

When original or replacement equipment acquired with federal funds is no longer needed for the original project or program, the equipment may be retained, sold or disposed, if it is not needed in any federally funded project or program. The LEA will need to ensure that records are kept and made available for monitors and auditors as to where the equipment was transferred.

The following are the procedures to eliminate any equipment item from the inventory:

1. Equipment items with an acquisition cost/current per unit fair market (an explanation is provided in the Definitions section) value of less than \$5,000 and are more than three years old may be retained, sold or disposed, with no further obligation to the District. The disposition of such items should be so noted on the equipment inventory maintained by the LEA.
2. Equipment items with an acquisition cost of \$5,000 or more may be retained or sold and the awarding agency (District) shall have a right to amount calculated by multiplying the current market value or proceeds from sale by the awarding agency (District's) share of the equipment.
3. If the current per unit fair market value is \$5,000 or more, the equipment may be retained or sold and the awarding agency (Department) shall have a right to an amount calculated by multiplying the current market value or proceeds from the sale by the state's share of the equipment. However, the entity is permitted to deduct and retain from the state's share \$500 or 10-percent of the sales proceeds, whichever is less, for the entity's selling and handling expenses. Note: The Department does not require this of Georgia's Title I LEAs. To date, the Department has not required this action of LEAs for the sale of Title I property in a

district. However, this procedure is outlined in EDGAR §80.32 Equipment (4) (e) and allows a state to require this process from their LEAs.

4. The disposition of such items should be so noted on the equipment inventory maintained by the recipient. The recipient should include the date of disposal and sales price or the method used to determine current fair market value if the recipient compensates the state.

The Principal is not permitted to make Federal purchases before they are approved by the appropriate procedure. A streamlined process of approval is in place for purchases made with system credit card, but prior approval is still required.

Federal programs inventory is maintained on a spreadsheet by school and District office. The spreadsheet identifies/describes the item, date of purchase, location, serial number, vendor, unit cost, funding source, use, condition, and disposition. Equipment purchased with federal funds is permanently marked with a preprinted property inventory sticker.

Location

All federally funded equipment is assigned a location within the school or district office upon receipt of the product. The location of the product will be noted in the school/system inventory spreadsheet.

Inventory

Inventory of all equipment and property belonging to any federal program is inventoried bi-annually. A building-level administrator will verify an inventory of items purchased with federal funds early each fall and the Technology Director, Federal Programs Director or designee will inventory items each Spring. Materials purchased for use in federal programs will be labeled and be utilized in the capacity for which it was purchased. Any equipment, materials and/or supplies purchased with federal funds are considered solely for the use of that program.

LEASE OF EQUIPMENT

The school system does not lease equipment using Title funds.

USE OF EQUIPMENT IN TARGETED ASSISTED SCHOOLS AND PRIVATE SCHOOLS

The school system does not have any targeted assistance schools. Currently, no private schools have opted to receive federal funds.

SITE VISITS

Random site visits may occur throughout the school year. For formalized monitoring, at least four scheduled site visits will take place throughout the school year with building level administration and the Federal Programs Director. During the formalized site visits, the principal along with any individuals working with the Title I budget and/or Title initiatives will meet with the Director to review procedures and pertinent information. Additionally, the Federal Programs Director will work with principals to correct any findings and answer any questions.

INTERNAL CONTROLS, EXPENDITURES, INVENTORY, DRAWDOWNS, COST PRINCIPLES- ALL PROGRAMS

CASH MANAGEMENT AND DRAWDOWNS

2 CFR 200.302(b)(6): 2 CFR 200.305

Wilcox County School District follows state and federal statutes, regulations, and guidelines (§200.303 Internal Control b). The Wilcox County District's financial controls promote efficiency, ensure appropriate implementation and safeguard all federal assets. The district employs a variety of financial processes for spending to ensure effective and efficient operations.

Segregation of Duties:

1. Each budget, after prepared at the school level, is reviewed by the Federal Programs Director, revised by school personnel, if necessary, and approved by the Federal Programs Director. Once a school makes the necessary compilation and the budget is submitted and approved by GaDOE, each school or department fills out purchase order requisitions.
2. The Principal and/or Teacher initiates the purchase order form, complete with:
 - Complete vendor information including phone number (and fax number if applicable)
 - Ship to information including the address for the school
 - Teacher and/or Principal signs approving the order after he/she verifies the materials being requested are part of the SWP.
3. The requisition is then sent to the Federal Programs Director for review.
4. The Federal Programs Director reviews the requisition to assure that the purchase is included in the School-Wide/School Improvement Plan.
5. The Federal Programs Director then signs off on the requisition and forwards the requisition to the Accounts Payable Clerk in the BOE Office.
6. The Accounts Payable Clerk obtains the signature of the Superintendent on all purchase orders, assigns a P.O. number, logs the P.O., presents to the Federal Programs Director for final review and orders the merchandise.
7. The Accounts Payable Clerk returns the P.O. to the school or department that made the requisition.
8. When the merchandise arrives, the school or department then signs either the p.o. or invoice and verifies that the merchandise is accounted for and returns the P.O. with supporting documents to Accounts Payable for payment.
9. The expenditure detail is entered into PC Genesis for payment by the 10th of each month.

After expenditures are entered, funds are drawn down on a reimbursement basis only for all allowable expenses incurred in their respective Federal Program(s). It is the responsibility of each Program Director, the Finance Director, and Superintendent to work together to complete a final review all program expenditures before funds are drawn down monthly from GAORS. The source documents that are required for Drawdown of Funds are assembled together into a packet for review on a monthly basis. This includes (1) Con App Master Budget, (2) Copy of expenditure reports sorted by school, function and object, and (3) PCG expenditure detail to compare to budget.

After review, the signed documents are approved and the signed packet is returned to the Finance Director for safekeeping for the required record retention timeframe. Then funds are requested via GAORS through submission of a DE0147. Appropriate journal entries are posted to the financial system from supporting documents. Once funds are received, a system bookkeeper reconciles the bank statements. There is no cash

involved as all drawdowns are directly deposited into our bank account. Supporting documentation is kept in Finance Office so that it can be accessed and reviewed at any time. Both the Federal Programs Director and Superintendent review documentation to ensure signatures, dates, and reconciliation verification is on all documents.

No sub-recipients are currently used in Wilcox County Schools.

Reliability of reporting for internal and external use

Reliability and reporting for internal and external use is ensured through various protocols.

The Annual Federal Programs Conference held by GaDOE deals with program and budget matters. Regional meetings with Program Directors, Program Specialists and GaDOE Consultants are held to discuss administrative issues, budgeting and program requirements. The Federal Programs Director and Special Education Director are also in regular contact with the GaDOE Program Specialists for any needed technical assistance. Any program changes may also be electronically communicated directly to the Federal Programs Director and Special Education Director from GaDOE and Area Program Specialists. Both Directors advise other appropriate school and district personnel of any program or administrative changes that may affect their responsibilities. The Federal Programs Director and Special Education Director keep a copy of the handbooks/guidance for **Title I, Part A, Title I-C, Title II-A, Federal programs-LEA, Title VI-B, IDEA, CARES, and, EDGAR** concerning these laws in the office files. (§200.303 c

Wilcox County's Compliance with Applicable Laws and Regulation

Federal Programs/IDEA Directors receive training on the **Federal Program** guidelines concerning allowable costs and are kept aware of any changes through Federal or GaDOE updates and workshops. Procedures are in place to ensure that direct charges against Title I Funds are not also charged against other Federal Funds. However, in some cases, it may be necessary to use funds from multiple grant sources. When this is necessary, it is indicated on the requisition. Audit trails and monitoring insure that the district is in compliance with all applicable laws and regulations.

The Wilcox County Board of Education uses the PC Genesis financial system which provides for separate accounting of Non-Federal funds (local and state) and Federal funds. The Federal Programs Director has been in the position for 10 years. She has received both formal and informal training from GaDOE and other veteran Federal Programs Director within the Heart of Georgia RESA district. She is familiar with the Title I Guidelines, and has been trained to identify the unallowable activities from the allowable ones. Also, the Federal Programs Director reviews the expenditures to make sure that the expenditures are in compliance with the Federal Programs Objectives and EDGAR. GaDOE directives are followed to ensure that accounts are properly maintained in line with any changes in the cost accounting system.

Reporting Procedures

The Federal Programs/IDEA Director receive a monthly detailed expenditure report (using PC Genesis) from the Financial Director that shows details of budget expenditures during the past month and on a cumulative basis. These reports are reviewed by the Federal Programs Director to ensure the expenditures

are aligned with the budget on the consolidated application. These reports keep the schools and Federal Programs/IDEA Director updated and informed about budget spending.

PROFESSIONAL LEARNING STIPENDS

(GaDOE Rule 160-3-3.04)

Stipends are funds awarded by the district to certified personnel for successfully completing professional learning opportunities that have occurred at any time during the fiscal year outside of the employee's normal contract/work hours (GaDOE Rule 160-3-3.04). Learning opportunities include successful completion of conferences, workshops, or courses approved by Federal Program Directors.

Stipends paid for with federal funds (GaDOE Rule 160-3-3.04):

- Must meet the guidelines of the funding source
- Compensation must be for work on an award for performance of allowable activities
- Must be necessary and reasonable to the federal program

Awarding of Stipends (GADOE Rule 160-3-3.04)

Stipends may only be awarded if the following conditions exist:

- There is evidence that the knowledge, skills, practices, and dispositions gained from the activity are aligned to an approved individual plan, or a school or district initiative and/or product, and/or specific goals; and
- There is evidence that the knowledge, skills, practices, and dispositions developed through participation in or facilitation of professional learning have been implemented/demonstrated in the classroom/work setting; and
- Participation occurs beyond regular contract hours, days, or school year.

State and federal funds designated for professional learning shall not be used to pay stipends to school board members or to school council members who are not employees of the district.

Federal Stipend Procedure

Stipends paid with federal funds may be available for approved professional learning activities that are above and beyond general requirements. All requirements outlined below must be met for professional learning participants to receive a stipend payment.

Allowability and Purpose

- For a federally funded professional learning activity to be approved by the grant administrator, it must align with allowable initiatives identified in the district's or school Comprehensive Needs Assessment (CNA) and action steps listed in the Improvement Plan (SIP) that result in increased student achievement.
- Stipends are extra pay for learning and effort that is above and beyond what is generally required and is outside normal contract hours. Unit/lesson planning are considered normal duties.
- All professional learning must be in a professional setting such as the school or Central Office.

Stipend Amount

- Stipends are paid at a rate of \$32 an hour for teachers and certified staff and \$15 for paraprofessionals
- An annual stipend may in some cases be awarded to employees who carry out additional duties to assist with state/system/school initiatives (ex. PBIS coaches) Annual stipends could range between \$1200 and \$1500.

Prior to payment, the following criteria must be met:

1. Participants must complete and submit a Professional Learning Stipend form to the Federal Programs Director prior to the training.
2. Upon completion of the professional learning session, the participant must turn in a Timesheet with all required signatures to the Federal Programs Director.
3. The Federal Programs Director will verify all of the above and then sign off on the timesheet which will then be submitted for payment to the payroll clerk.
4. Payment of stipends will follow WCSS' payroll calendar. Submittals made after the due date for leave sheets will be paid the following month.

TITLE I PART-A WITHIN DISTRICT ALLOCATION PROCEDURES

ALLOCATING FUNDS TO ATTENDANCE AREAS

ESEA: Sec. 1113; 34 CFR 200.70 and 200.71

The Wilcox County School System only has one school per grade band: PK-5, 6-8, and 9-12. Therefore, attendance area determination is not needed to establish rank order.

A local educational agency (LEA) shall use funds received under the Title I, Part A of the Elementary and Secondary Education Act of 1965 (ESEA) only in eligible school attendance areas. The term *school attendance area* means, in relation to a particular school, the geographical area in which the children who are normally served by that school reside; and the term *eligible school attendance area* means a school attendance area in which the percentage of children from low-income families is at least as high as the percentage of children from low-income families served by the LEA as a whole.

The following points summarize the requirements of Section 1113 of ESEA and 200.70 and §§200.71 of the Title I regulations for identifying eligible school attendance areas; selecting those eligible areas that will participate in Title I, Part A; and allocating Title I, Part A funds to *participating areas*:

GENERAL SELECTION REQUIREMENTS

1. An LEA must rank **all** of its school attendance areas (the geographic area from which a public school draws its children) according to their percent of poverty.

• An LEA must use the same measure of poverty for:

- Identifying eligible school attendance areas
- Determining the ranking of each area
- Determining the allocation for each area.

The LEA must select a poverty measure from the following options:

- Children ages 5 to 17 in poverty as counted in the most recent census data approved by the Secretary.
- Children eligible for free or reduced price meals (FRM) under the Richard B. Russell National School Lunch Act.
- Children in families receiving assistance under the state program funded under Title IV, Part A of the Social Security Act Temporary Assistance for Needy Families (TANF).
- Children eligible to receive medical assistance under the Medicaid program.
- A composite of any of the above measures.

An LEA must rank school attendance areas based on the **percentage** (not the number) of low-income children counted.

2. After an LEA has ranked all of its school attendance areas by poverty, the LEA must first serve, in rank order of poverty, its areas above 75 percent poverty, including **any** middle schools or high schools.

3. Only after an LEA has served all of its areas with a poverty rate above 75 percent may the LEA serve lower-ranked areas. The LEA has the option to (1) continue on with the district-wide ranking or (2) rank remaining areas by grade span groupings.

The same district-wide poverty average must be used if the LEA selects option (1).

For ranking by grade span groupings, the LEA may use (1) the district-wide poverty average or (2) the district-wide grade span poverty averages for the relevant grade span grouping.

If an LEA has no school attendance areas above 75 percent poverty, the LEA may rank its schools district-wide or by grade span groupings.

An LEA's organization of its schools defines its grade span groupings. For example, if an LEA has elementary schools serving all elementary grades, middle schools, and high schools, the grade span groupings would be grades K to 5, 6 to 8, and 9 to 12. To the extent an LEA has schools that overlap **grade**

spans (e.g., K to 5, K to 8, 6 to 8); the LEA should include a school in the grade span in which it is most appropriate.

4. An LEA with an enrollment of less than 1,000 students or with only one school per grade span is not required to rank its school attendance areas. Wilcox County Schools meet this criteria.

LEA Discretion in Selecting Participating Areas and Schools

5. An LEA may:

Designate as eligible any school attendance area or school in which at least 35 percent of the children are from low-income families - i.e., the 35 percent rule.

Use Title I, Part A funds in a school that does not serve an eligible school attendance area if the percentage of children from low-income families enrolled in the school is equal to or greater than the percentage of such children in a participating school attendance area of the LEA.

Elect not to serve an eligible school attendance area or school that has a higher percentage of children from low-income families (than a school that is served) if:

- The school meets the Title I comparability requirements.
- The school is receiving supplemental funds from other state or local sources that are spent according to the requirements of Sections 1114 or 1115 of ESEA.
- The funds expended from such other sources equal or exceed the amount that would be provided under Title I, Part A.
- For one additional year only, designate and serve a school attendance area or school that is no longer eligible but was eligible and served in the preceding year. When using this option, an LEA must meet the requirement to serve schools in rank order.

If Wilcox County had more than one school per grade band the District would use the following ranking procedure for its CEO schools:

Community Eligibility Option (CEO)

With the passage of the Healthy, Hunger-Free Kids Act of 2010 (Act), the National School Lunch Program now includes a new universal meal program, the Community Eligibility Option, which is being phased in over several years by the U.S. Department of Agriculture (USDA). The Community Eligibility Option (CEO) permits eligible schools to provide meal service to all students at no charge, regardless of economic status. Wilcox County School District will implement the Community Eligibility Option (CEO) in all DCS schools for FY 14. The CEO uses only direct certification data, such as data from the Supplemental Nutrition Assistance Program (SNAP) or Temporary Assistance for Needy Families (TANF) program to determine the Federal cash reimbursement provided by USDA. CEO will not rely on annual household applications that are generally used to determine eligibility for free or reduced meals (FRM). The following procedures will be implemented to determine rank order for the CEO schools in Wilcox County School District.

The Food Service Department provides a list, by school, of the number of students who are direct certified (DCs) Students through SNAP (Supplemental Nutrition Assistance Program) or TANF (Temporary Assistance for Needy Families), Extended Eligible (students “attached” to DCs), Homeless, Runaways, Migrant, Foster children, and/or approved by Local Officials. This information is entered into the Food Service form “District CEO Participation by Site”. Also, the Food Service Director signs off on the FTE October report verifying the number of Pre-K students at each elementary school who are DC for Free and Reduced Lunch.

This number is entered into the Eligible Attendance Area worksheet in the column “economically disadvantaged students identified by data for school lunch program minus Pre-K”

This number may or may not be multiplied by the 1.6 multiplier to give the percentage of DC students by school.

Each school is then rank ordered from highest to lowest percentage.

If a new school is opened or one decides to pull out of CEO the following procedures will be followed.

Non-CEO Eligible Attendance Area Worksheet and Rank Order Procedures

1. Pull Free and Reduced (F&R) information from GaDOE website. You must use the previous year’s 1st October Free and Reduced Lunch Count and the previous year’s 1st October FTE. The FTE count is for enrollment. The Free and Reduced Lunch Count is used for determining the number of free and reduced meals.
2. This process should take place starting in April.
3. If applicable: Determine new schools or schools that are being redistricted/ rezoned. You will also need to request the names of the students being moved from one school to another in this rezoning/redistricting process in order to obtain a count. This information may be obtained from Instruction and/or Transportation Director.
4. Request the free and reduced information for students affected by moving to a different school due to a new school opening or redistricting/ rezoning. This information is obtained from the Nutrition Department.
5. For each school, list the schools receiving students and indicate the number free and reduced lunch students. Place all information for all schools in the district on the large spreadsheet
6. Complete Worksheet for Determining the Number of Students Moved.

Complete the Worksheet for Eligible Attendance for the Consolidated Applications process.

RESERVATION OF FUNDS

ESEA: Sec. 1113; 34CFR 200.70 and 200.71

Written Procedures for Ensuring Reservation of Funds (Set Asides)

Wilcox County Schools uses the information provided by GaDOE to determine reservations of funds for the required set asides of Homeless Children and Youth, Neglected and Delinquent, Parent and Family Engagement, and Private School Proportionate Share, if applicable. After receiving notification of the Title I, Part A grant amounts, reservations are set aside for required components.

Homeless Children and Youth Set-aside:

Title I LEA’s are required to set aside funds within their budgets to meet the needs of homeless children and youth. Homeless set aside funds are used to purchase needed supplies and for tutoring services for identified homeless students on an as needed basis. There are four methods that may be used to generate the local Homeless set-aside amount. Wilcox County Schools currently uses Method #1—Reserve the set aside amount based on anticipated needs of homeless students. Homeless students are identified through the Student Housing Questionnaire and through staff identification. The Family Engagement Coordinator serves

as the Homeless Liaison for the district. He trains school personnel including: counselors, office personnel, teachers, bus drivers, and administration to identify children in homeless situations. Upon notification, the Family Engagement Coordinator investigates the situation and makes the ultimate determination on whether or not students qualify as homeless. When a student does qualify, notes are maintained related to the situation and a memo is sent to the Student Information Coordinator and the Director of Food and Nutrition. Homeless students have access to educational and other services that are needed to meet the state standards to which all students are held. Homeless students are provided the same privileges as all other students enrolled in the LEA. In the event that additional funds are needed to meet the unmet needs of these youth a budget amendment may be needed if the set-aside amount is not sufficient.

Neglected and Delinquent Youth Set-Aside:

The reservation amount provided by GaDOE is the amount set aside for neglected and delinquent children. Currently, there are no residential facilities for neglected children in the Wilcox County Schools attendance area and no set aside is needed. The Annual Survey of Local Institutions for Neglected and 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.

Parent and Family Engagement Set-aside:

Local educational agencies with a Title I, Part A allocation of \$500,000 or less must carry out the provisions of Section 1116 but are not required to reserve any specific amount from their Title I, Part A allocation to do so. Wilcox County Schools receives a Title I, Part A allocation greater than \$500,000; therefore, 1% set aside is required. A minimum of ninety-five percent of one percent of the entire Title I allocation is given to schools for parent family engagement activities. Principals have the option of expending the funds or submitting them back to the system level. Should a principal decide to direct those funds to a district level parent engagement activity/project, he/she must sign a District-Wide Parent Activity Assurance form.

Private School Proportionate Share (including carryover):

Wilcox County Schools currently has no Private Schools that have chosen to participate in the Title I program. If Wilcox County Schools ever have any private school that chooses to participate, all Title I regulations for private school participation will be followed and the Proportionate Share Worksheet developed by GaDOE will be used to determine the private school allocation. 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.

Currently, Wilcox County School System has NO participating private schools.

Procedures for the Calculation of Parent & Family Engagement Carryover:

Parent and Family Engagement Carryover - 1% of Title I allocation is set aside for Parent and Family Engagement. When that 1% allocation is not spent in the fiscal year, the funds are carried over to the next year to be allocated in Parent and Family Engagement. This is calculated after the completion report is completed in September of each year. The Finance Director prepares a printout of all 2100 set aside funds budgeted and not spent for the prior year. These are the funds that are held at the BOE as a set-aside in the Title I Budget. This amount is attached to the Title I Budget on the general attachment tab on the Con App. These funds are added to each school's budget as the carryover funds are added to the Con App. All carryover funds in Parent and Family Engagement must be spent first, before expending any of the current year's Family and Parent Engagement allocated funds.

RANK ORDER

ESEA: Sec. 1115

All schools in Wilcox County are school-wide schools. Currently, no private schools have opted in to receive services.

PROCEDURE FOR RANK ORDERING FOR INITIATIVES FOR SELECT STUDENTS IN SCHOOLWIDE PROGRAMS AND PRIVATE SCHOOLS

Federal Programs Requirements for Rank Ordering for Initiatives for Select Students in Schoolwide Programs:

- ☐ Rank order lists must be completed in schoolwide programs where participation is offered to a select group of eligible Title I students (Targeted Assistance like programs within a schoolwide program) and for services provided to private schools.
- ☐ Funds from a school's approved Title I budget may be used for allowable initiatives for select students only in a schoolwide program identified as failing or most at-risk of failing to meet State academic achievement standards. Private schools may use Title I funds to support needs identified in their Private School Annual Plan and Evaluation for students identified as failing or most-at-risk of failing to meet State academic achievement standards.
- ☐ Initiatives must meet evidence-based criteria as defined by the Every Student Succeeds Act (ESSA) and must be listed in the school's Comprehensive Needs Assessment and 125 School Improvement Plan or private school's Private School Annual Plan and Evaluation.
- ☐ Eligible students in grades 3 through 12 must be identified by the school on the basis of multiple, educationally related, objective criteria as established by the district and supplemented by the school for each core content area (English language arts, math, science and social studies) and grade level being served.
- ☐ Eligibility of students in grades K through 2 must be determined on the basis of judgment of teachers and interviews with parents based on identified criteria and through the use of other developmentally appropriate measures. A rank order list should be completed for K through 2 students ranking students by greatest need based on the listed methods.
- ☐ A separate rank order list must be created for each targeted core content area.
- ☐ Rank order lists must include every student in the targeted core content area and grade level.
- ☐ Rank order lists for each core content area and grade level being targeted must be completed for each semester of the current school year.
- ☐ New students enrolling during the semester will not be placed on the rank order list until the rank order list is completed for all currently enrolled students for the next semester.
- ☐ Rank order lists must be reviewed and approved by the Director of Federal Programs prior to the start of services for select students eligible for services.

Selecting Multiple, Educationally Related, Objective Criteria for Rank Ordering:

- ☐ Eligibility of select students in grades 3 through 12 for allowable initiatives must be based on multiple educationally related, objective criteria.
- Two allowable criteria should be used for rank order lists.
- ☐ Examples of educationally related, objective criteria that may be used for rank ordering students are listed below:
 - Georgia Milestones
 - Measures of Academic Progress (MAP) scores
 - Lexile scores
 - Credit deficiency (difference in credits attempted and credits earned)
 - Retention in school career
- ☐ It is recommended to use retention as one of the two required criteria for rank order lists.

Creating the Rank Order List:

☐ Rank order lists must contain required data for every student in the core content area and grade level being targeted.

- All Special Education (SPED) and English Learner (EL) students must be included in the rank order list even if the initiative is not appropriate for the student.

☐ Rank order lists should be completed in an Excel spreadsheet for ease of sorting students by rank order of total points assigned based on the multiple, educationally related, objective criteria used.

☐ The Excel spreadsheet must contain the following column headings for student data:

- Student Number

- Last Name

- First Name

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- Grade

- Cohort (high school only)

- SPED

- Self-Contained

- EL

- Criteria #1 Name

- Criteria #1 Points

- Criteria #2 Name

- Criteria #2 Points

- Test Date (when applicable)

- Total Points

- Comments

☐ The rank order list file name should reflect the school name, name of the initiative and semester for which it was created.

☐ Once the two allowable criteria for ranking students are selected, data should be imported into the Excel spreadsheet.

Addressing Missing Data for Selected Criteria for Students:

☐ Every student on the rank order list must have data for each selected criteria or descriptive comments must be noted on the rank order list to explain why the student is missing specific data and/or why the initiative is not appropriate for the student, if applicable.

☐ If missing data for any student on the rank order list is not provided by the school a requested by the deadline established by the Director of Federal Programs, the rank order list will not be approved and the start of services may be delayed.

☐ Students may be missing data for a selected criteria for multiple reasons such as:

- SPED students who are being served under adapted curriculum.

- EL students who are currently enrolled in English to Speakers of Other Languages (ESOL) services (when a reading/ELA intervention is being utilized).

- Students transferring from another Georgia school district or other state who have not previously taken an assessment selected as a criteria.

☐ If a student is missing data for a selected criteria, the following must occur as applicable:

- For students receiving SPED services:

☐ Determination that the initiative is not appropriate for the SPED student based on the current curriculum being delivered must be documented in the student's Individualized Education Program (IEP) and verified by the district Special Education Department.

- For students receiving ESOL services:

☐ Determination that the initiative is not appropriate for the EL student must be verified by reviewing the student's current schedule and confirming assignment to an ESOL course. Confirmation from the school

administration that the student is currently receiving ESOL services must be obtained if an ESOL course is not listed on the student's schedule (when a reading/ELA intervention is being utilized)..

- For students transferring from another Georgia school district or from out of state:

☐ The selected assessment used as a criteria should be administered to the student as soon as possible in an upcoming assessment window.

☐ If there is no upcoming assessment window for the selected assessment available within a reasonable amount of time, a most recent, qualifying and comparable assessment score may be used. The comparable assessment used must be approved by the Director of Federal Programs.

☐ Occurrences of missing data for students for selected criteria under circumstances not listed above will be reviewed by the Director of Federal Programs. Actions necessary to determine eligibility of the student will be coordinated with the school and other district staff as needed.

-Documentation Required for Students Exempted from Services:

☐ For students receiving SPED services and for whom the initiative is not appropriate:

Current IEP listing the type of curriculum the student receives (reviewed upon request).

☐ For students receiving ESOL services and for whom a reading/ELA initiative is not appropriate:

-Current schedule showing assignment to an ESOL course or

-Written verification from the school confirming that the student is currently receiving ESOL services if an ESOL course is not listed on the student's schedule.

☐ For high school students who require placement in core content classes in order to graduate and whose current schedule does not have room for elective courses:

- Documentation of a parent conference held with the student's parent or guardian to discuss the student's eligibility for the initiative and the priority need for the student to be placed in core content classes in order to graduate and the parent/guardian's agreement for the student not to receive services for the initiative. Details of the parent/guardian conference must be documented in the student's PowerSchool Contact Log and must list the following:

o Name and position of the school staff member conducting the conference.

o Date of the parent/guardian conference.

o Time of the parent/guardian conference.

o Contact method used for the parent/guardian conference (e.g in person, by phone).

o Entry in the student's Contact Log in Infinite Campus confirming discussion with the parent/guardian regarding the student's need for priority placement in core content classes in order to graduate and that the student will not receive services through the initiative and the parent/guardian's agreement for the student not to receive services for the initiative.

- Current transcript verifying credits attempted and credits earned.

☐ For students eligible to receive services in a READ 180 class but have taken Reading I and

Assigning Points to Selected Criteria:

☐ Points must be assigned to each selected criteria in order to calculate total points for each student on the rank order list.

☐ To assign points to assessment scores or credit deficiencies, a chart listing ranges for all assessment scores or credit deficiency totals should be created with points assigned to each range.

- Ranges should be equally distributed.

- All student scores or credit deficiency totals reported on the rank order list must be included in the ranges.

☐ Points for retention should be assigned as follows:

- Zero (0) points should be assigned for no retentions in the student's school career.

- Points should be assigned for any retentions in the student's school career (e.g. 3 points).

☐ To assign points to a qualifying, comparable assessment score being used in place of a selected assessment, point ranges must be of the same number as the compared values.

☐ Charts assigning points to selected criteria should be entered on a separate sheet in the

Excel spreadsheet workbook for easy reference.

☐ Sample charts assigning points to assessment scores, credit deficiency totals and retention data are shown below:

Calculating Total Points and Sorting the Rank Order List:

☐ The points assigned for each criteria selected must be totaled for each student and entered on the rank order list.

☐ It is recommended to use an Excel formula to calculate total points to avoid errors and ensure accurate calculation of points.

☐ Once total points have been calculated for each student, the rank order list should be sorted in the following manner:

- Students who are missing any criteria data with descriptive comments to include action steps to obtain the missing data.

- SPED or EL students for whom the initiative is not appropriate with descriptive comments.

- Regular education students for whom the initiative is not appropriate with descriptive comments.

- Remaining students by total points highest to lowest and by last name.

Determining Students to Serve Based on the Rank Order List:

☐ All students at a total point value selected and above must be served.

- Space limitations will not remove a student from receiving services for the initiative for 2nd semester if the student is dropped lower on the new 2nd semester rank order list due to new students being added and ranked as eligible at a higher point value.

- All eligible students at a particular total point value and up will be served based on space that becomes available on the 2nd semester rank order list due to the following:

☐ Students who have withdrawn or transferred.

☐ Students who have tested out of the initiative.

☐ For services being delivered to eligible students via classroom instruction during the school day, the maximum spaces available in the total number of classes offered should be determined.

- Total points for students on the sorted rank order list should be reviewed to determine how many eligible students can be served in available classes.

- Student information for those students identified for services based on available spaces in classes should be highlighted for easy reference.

☐ For services being delivered to eligible students through an extended learning program outside of the school day, the maximum spaces available in the extended learning program should be determined.

- Total points for students on the sorted rank order list should be reviewed to determine how many eligible students can be assigned to available spaces in the extended learning program.

- Student information for those students identified for services based on available spaces in the extended learning program should be highlighted for easy reference.

☐ For credit recovery being completed by eligible students via an extended learning program outside of the school day, students needing credit recovery as indicated on the rank order list should be invited and given the opportunity to attend the extended learning program being offered by one of the following methods:

- Invite all students needing credit recovery based on total points.

- Invite students needing credit recovery in order of total points assigned on the rank order list for selected point ranges.

Addressing Student Withdrawals and Transfers on the Rank Order List:

☐ Students on the rank order list who withdraw from or transfer out of the school district should be marked as applicable on the rank order list.

- Student information on the rank order list should be crossed out using the strikethrough formatting tool.

The entire row should be highlighted and 'Transferred' or

'Withdrawn' with the effective d3a3te7 should be entered in the Comments section.

☐ In the event a student being served withdraws or transfers from the district and then returns to the school within the same school year with the same rank order, the student must retain their ranking on the rank order list and resume services upon reenrollment at the school.

- Student information on the rank order list should be reformatted to reflect that they are receiving services. 'Reenrolled' and the effective date with the effective date services are resumed should be entered in the Comments section.

☐ Student withdrawals and transfers should be monitored closely as spaces become available in the point ranges being served.

- Students eligible for services in the next point range may be placed in classes or programs as spaces become available as long as all students in the next point range are served.

Addressing Discontinuation of Services for Students on the Rank Order List:

☐ Services may be discontinued for students who test-out of a specific program or class based on predetermined criteria after review and approval by the Director of Federal Programs.

- Student information on the rank order list for those who test-out of a class of a program should be crossed out using the strike-through formatting tool. The entire row should be highlighted and 'Tested Out' with the effective date should be entered in Comments section.

- Testing evidence will be maintained by the Federal Programs Department.

☐ Test-outs are not applicable to students receiving services through an extended learning program.

☐ Services may be discontinued for students who complete credit recovery assignments.

- There is no requirement to annotate student information on the rank order list for those students who complete credit recovery assignments.

Timeline for Submitting Rank Order Lists for Review and Approval:

☐ Rank order lists must be reviewed and approved by the Director of Federal Programs prior to starting any services for eligible students.

☐ Rank order lists must be submitted at least 10 school days (excluding holidays) prior to the anticipated start date of services.

- Deadlines for submission of missing or additional data required to complete the rank order list must be adhered to or the start date of services for the initiative may be delayed.

☐ Rank order lists for extended learning services for select students only should be submitted with the extended learning planning sheet for review and approval according to the deadline established in the Guidelines for Title I Funded Extended Learning

Programs.

☐ Rank order lists for second semester and summer programs must be submitted for review and approval by the deadline established by the Director of Federal Programs

PARENT INVOLVEMENT POLICY AND PROCEDURES

PARENT INVOLVEMENT POLICY OVERVIEW

Wilcox County School System has an on-going commitment to our Title I parents. Parental involvement is defined as the participation of parents in regular, two-way, and meaningful communication involving student academic learning and other school activities. Our goal is to ensure that our Title I parents and their children receive extraordinary services and assistance that will lead to improved academic achievement. The district 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.

PARENT NOTIFICATION AND COMMUNICATION IN AN UNDERSTANDABLE AND UNIFORM FORMAT

When parents mark on the enrollment form that they need correspondence in another language, to the extent practical, efforts are made to provide either written support or support through an interpreter. The Federal programs director supports these efforts as well as school staff who are fluent in multiple languages. Google Translate is also available and can be used to translate documents. Furthermore, all parent communication is written in a format so that the content is easily understandable.

PARENT NOTIFICATIONS OF SCHOOL DESIGNATION STATUS

The District follows the guidelines for parent notifications according to the guidance set by the Georgia Department of Education to ensure that all Title I schools notify parents in multiple ways, inclusive of a letter sent home to Title I parents, of the schools' designation status under Georgia's ESEA Flexibility Waiver and that such notifications are timely, correct, and provided in appropriate languages, as necessary. The District follows timelines to ensure the timely dissemination of parent notifications. These notices are sent home to parents on the first day of school via First Day of School Packet and/or Student & Parent Handbook and copies are on each school's website. These procedures must include written directives to the schools for required information to be included in the letter/notification, as well as proper timelines for when communications should be sent out so they are received by parents in a timely manner (at the beginning of the school year)

SCHOOL DESIGNATION STATUS

SCHOOL IMPROVEMENT 1003(a) (ESSA: Sec. 1112(c)(1)(D), Sec. 1114(b)(1), Sec. 1116(b)(3), Sec. 1116(b)(3)(A), Sec. 1116(b)(3)(A)(iii), Sec. 1116(b)(4)(B), Sec. 1116(b)(4)-(6), Sec. 1116(c)(7), Sec. 9101(34))

Wilcox County School System has NO CSI, TSI, or Promise Schools.

Under the Every Student Succeeds Act, the GaDOE is required to annually identify schools in need of additional support. The criteria for identification of schools is as follows:

Comprehensive Support and Improvement (CSI)

Entrance Criteria-Lowest 5% Title I Schools Only:

1. When ranked according to their three-year CCRPI average, are among the lowest performing schools that represent 5% of all schools eligible for identification.

Exit Criteria: A school may exit if the school no longer meets the lowest 5% entrance criteria AND demonstrates an improvement in the overall CCRPI score greater than or equal to 3% of the gap between the baseline CCRPI score (the three-year average that led to the school's identification) and 100. This 3% improvement must be demonstrated from the highest of the three CCRPI scores used in the three-year average to the current CCRPI score.

2. Low Graduation Rate-All High Schools: Have a four-year adjusted cohort graduation rate less than or equal to 67%. Attains a four-year adjusted cohort graduation rate greater than 67%.

3 TSI Additional Targeted Support: Title I Schools Only:

Have been identified as a targeted support and improvement (TSI) school for additional targeted support for three consecutive years without exiting TSI status.

4 Promise Schools Title I Schools Only:

When ranked according to their three-year CCRPI average, are among the lowest performing schools that represent greater than 5% to 10% of all schools eligible for identification.

The purpose of Promise Schools is to provide supports to these schools to sustain improvement or

provide proactive supports before they fall into the lowest 5% CSI category. A school may exit if the school no longer meets the greater than 5% to 10% entrance criteria AND the school's current overall CCRPI score is greater than the baseline CCRPI score (the three-year average that led to the school's identification). A school may exit if no subgroup is performing in the lowest 5% of all schools in at least 50% of CCRPI components.

ESEA PUBLIC SCHOOL CHOICE

Due to the state's ESEA waiver, Wilcox County School System is not required to offer the Federal School Choice option. Wilcox County School System is unable to offer intradistrict public school choice since there is only one school per grade span: K-5, 6-8, and 9-12.

PARENT INVOLVEMENT PLANS

District and school parent involvement plans are reviewed and revised annually with parents and other stakeholders (teachers, principals, administrators, and other school personnel). The district will hold a meeting for review of the district and school Parent Involvement Plans at the Central office. All Title I parents, teachers, administrators, and other school personnel in the district will be invited to the meeting to provide input. A notice will be put in the paper of the meeting dates. Parents and other stakeholders will be notified by invitation sent to each individual school. Parent notices will be sent home from the school. District parents that cannot attend the meeting will be given the opportunity to obtain a copy from Central office and submit input before the final revisions are approved. The Title I Director will be responsible for collecting the required information (agenda, meeting notes, and sign in sheets). The district will hold the meeting in the spring to revise plans for the next school year. The LEA Parent Involvement Policy checklist will be applied to district and school plans. Revision dates will be clearly marked on each plan. The Title I Director will review plans during on-site monitoring visits. Plans include activities/workshops that have been identified and requested through the previous year's annual parent involvement survey. School improvement and parent involvement plans are posted on the website, available at the school and hard copies are either in the student handbook or beginning school packets at each school.

Each school in the Wilcox School System holds an annual open house. These meetings give parents the opportunity to review and provide feedback on system-wide student data, parent activities, district and school Parent Involvement Plans, Schoolwide Title I Plans, district and school Comprehensive Improvement Plans. Parents are notified about this opportunity through advertisements in local media, school-level flyers, and social media web sites and by using the call notification system and the system web site. The school district uses the comments provided by parents during the annual review/revision of documents at the annual System Leadership Retreat, parent workshops, and Parent Advisory Council. After the school system review/revision process, district and school Parent Involvement Plans are made available to parents on the district website and on Title I schools' websites. Copies are also available in Parent Resource Centers. Parents are also given the opportunity to provide feedback about Title I programs by completing annual parent surveys. These comments are used by the District and Title I schools when planning parenting programs.

PARENT INVOLVEMENT PLAN DEVELOPMENT PROCESS

The person or persons tasked with the writing or updating the parent procedures will include the following items in the procedures:

- Person(s) responsible for the review and revisions
- Timeline for review and revisions
- Information on what must be contained in each policy

- How all Title I parents will be notified and invited to provide input into the Parent Involvement Policies (PIP)
- Protocols for procuring and maintaining documentation to illustrate that parents were actively engaged in the revision process
- Wilcox County School System's protocol for distributing both school-level Parent Involvement Policies (PIP) and District-Level Parent Involvement Policies to all Title I parents.
- Review and Revisions

Person(s) responsible for reviews: School-Level: Principals; District-Level: Federal Programs Director
 1. Schools will utilize the GaDOE "*School Level Parental Involvement Policy*" checklist/rubric to ensure complete compliance to Title I, Section 1118 of the ESEA.

2. The Federal Program Director will utilize the GaDOE "*School Level Parental Involvement Policy*" checklist/rubric to verify that each school has met the requirements of Title I, Section 1118 of the ESEA. This completed document will be filed as documentation for cross-functional monitoring purposes.

3. On the district level, the LEA will utilize both the GaDOE *Parental Involvement Compliance and Parent Notification Checklist* and the GaDOE *LEA Level Parental Involvement Policy* documents to evaluate quality and compliance of the district-level PIP.

The **timeline** for Parent Involvement Policies (PIP) to be revised is established on the system's Federal Programs' Calendar available to all principals and central office staff. The revision process starts in February and is required to be completed and approved by July of each year. Each principal will facilitate the process with the guidance and support of the Federal Programs Director

School and system protocols will require that all parents are contacted using multiple avenues of communication. At a minimum, each school and the school system will be required to:

1. School-Level

- **Send letters** home to all Title I parents explaining the purpose of the PIP, the process of revisions, the date and time of the meetings for revisions and the date and time of the final approval meeting. Letters are required to be sent home a minimum of two weeks prior to the first revision meeting.
 - A notice on each school's **website** and the district's website a minimum of two weeks prior to the first revision meeting.
 - All Title I parents will be contacted via the school system's call system, **One Call Now**. The message will be sent as a reminder to parents, no more than five days before the revision meeting. Principals will be required to print out and submit a copy of the call report to the Federal Programs Director within two days of the calls being made.
2. District-level • A Parent Engagement Committee meets twice a year as a part of the District Leadership Team meeting to review and provide input into the district level parent involvement plan. One meeting is held in the fall to review parent feedback and another meeting is held in the spring. Meeting notices are emailed and/or mailed to committee members to inform them of the day, time and agenda for the meeting.

DISTRIBUTION OF COMPLETED PLANS

1. School-level • Once the PIPs are finalized, the schools will ensure that the final document is placed on the system website. Screen shots will be taken by each school and submitted to the Federal Programs Director as evidence for cross-functional monitoring.

- A hardcopy of the PIP will be visible and available at all times for parents to access in the main office and in the school's parent resource rooms.

- Hardcopies will be available for parents at the Annual Title I Meetings held at each school in the fall of each year.
 - Hardcopies will be distributed and sent home with ALL students within the first week of the school year.
2. District-level • Once the PIP is finalized, the Director of Federal Programs will ensure that the final document is placed on the system website. Screen shots will be taken by the Federal Programs Director as evidence for cross-functional monitoring.
- A hardcopy of the PIP will be visible and available at all times for parents to access in the main office of the district office.
 - Hardcopies will be available for parents at the Annual Title I Meetings held at each school in the fall of each year.

Plans include system and school improvement plans, parent involvement plans, Title I schoolwide plans, parent-school compacts, flexible learning program plans, comprehensive LEA improvement plan (CLIP), 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. Parental input into the content of each plan is solicited during multiple meetings throughout the school year but especially at the annual Title I meeting conducted each fall.

SCHOOL-PARENT COMPACTS

All Title I schools are required to have parent compacts. It is the responsibility of the principal in coordination with the Federal Programs Director to make sure that all compacts are reviewed and revised annually. The review and revision will occur in the spring of the year at the District Leadership Team meeting, school council 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 given in school newsletters and through the school's web site. The Principal will be responsible for setting up meetings and collecting required information (agenda, meeting notes, and sign in sheets). Parent compacts will include responsibilities for the teacher, parent, and students. Compacts will be distributed to all parties involved for signatures in the fall of the year.

Copies of the signed parent compacts are kept on file in the office of the Principal. The Wilcox County Board of Education believes that the public schools belong to the people who create them and that student educational goals should reflect the goals of the community. We affirm and assure the rights of parents to participate in the development of the goals and objectives of the public schools and encourage involvement in all areas of their children's educational experiences.

Schools will utilize the GaDOE "*Shared Responsibilities for High Academic Achievement School-Parent Compact*" rubric located in the GaDOE's "*Systemic Family Engagement: A Comprehensive Guide to Implementing an Effective Title I Parental Involvement Program*", pages 33-34, to ensure complete compliance to Title I, Section 1118 of the ESEA. The Federal Program Director will utilize the GaDOE's "*Systemic Family Engagement: A Comprehensive Guide to Implementing an Effective Title I Parental Involvement Program*", pages 33-34 rubric to verify that each school has met the requirements of Title I, Section 1118 of the ESEA. This completed document will be filed as documentation for cross-functional monitoring purposes.

The timeline for School-Parent Compacts (SPC) to be revised is established on the system's Google calendar available to all staff. The revision process starts in spring and is required to be completed and approved before school begins in the fall. Each principal will facilitate the process with the guidance and support of the Federal Program Director. School and system protocols require that all parents are contacted using multiple avenues of communication. At a minimum, each school and the school system will be required to:

1. Send letters home to all Title I parents explaining the purpose of the SPC, the process of revisions, the date and time of the meetings for revisions and the date and time of the final approval meeting. Letters are required to be sent home a minimum of two weeks prior to the first revision meeting.
2. A notice on each school's website and the district's website a minimum of two weeks prior to the first revision meeting.
3. All Title I parents will be contacted via the school system's call system, One Call Now. The message will be sent as a reminder to parents, no more than five days before the revision meeting. Principals will be required to print out and submit a copy of the call report to the Federal Programs Director within two days of the calls being made.

Distribution of SPCs to parents:

1. Once the SPCs are finalized, the schools will ensure that the final document is placed on the system website in a highly visible location. Screen shots will be taken by each school and submitted to the Federal Programs Director as evidence for cross-functional monitoring.
2. A hardcopy of the SPC will be visible and available at all times for parents to access in the main office and in the school's parent resource rooms.
3. Hardcopies will be available for parents at the Annual Title I Meetings held at each school in the fall of each year.
4. The Title I Back to School Pack will include a copy of the SPC, and a statement page that clearly details the process of developing the SPC, the purpose of the SPC and the availability of the SPC for parents. Schools will retain written documentation, to include student and parents signatures of receipt. In addition, schools will request parents to return the SPC Acknowledgment Document to the schools upon receipt.

ANNUAL TITLE I MEETING

All Title I schools are required to hold an annual meeting at the beginning of school. It is the responsibility of the principal to arrange meeting times and invite all stakeholders to the meeting. The principal will be responsible for collecting and submitting documentation of the required Title I annual meeting, including a copy of the sign in sheet, agenda, and minutes to the Federal Programs Director.

In compliance with new state and federal requirements set forth in the spring of 2013, **Annual Title I meetings cannot be held in conjunction with open houses or PATS meetings.** Annual Title I meetings can be held on the same day as other meetings, however, the Title I meeting must have its own agenda, sign-in sheets and minutes. Only after the Annual Title I meeting is completed, can another begin. Meetings are also announced via paper copies to parents, websites, call system, and marquees at each school.

ANNUAL EVALUATION

Process to Collect: The annual survey is provided to schools after parent advisors have reviewed and made suggestions for improvement of the survey. The parent survey is conducted in the fall. In addition, an AdvancED survey is conducted every other year in the spring. Advertisement of the surveys and requests for completion occur through the newspaper, newsletters, web site, automated phone calls and word of mouth.

The surveys are collected and compiled and upcoming parent involvement activities are built from the responses.

Process to Review: The results of the surveys are shared among several groups of stakeholders, including, but not limited to, parents, school and central office administration, and community stakeholders. School councils/District Leadership Team members and those attending the annual Title I meeting review the results of the surveys while reviewing and revising the schoolwide and parent involvement plans and components.

Actions Taken by LEA to Improve the Quality and Effectiveness of Parent Involvement Policies and Practices: The federal Program Director reviews the annual survey as well as the results from the previous surveys during Federal Program Reviews with building level administration. Additions/deletions/revisions are discussed and agreed upon during this meeting. Formatting and revisions are made after the meeting and then sent back for comment. If no further suggestions are made, the surveys are sent to schools to print and send to parents without being embedded in other materials. WCSS will utilize the grade-span specific survey templates provided in the *Systemic Family Engagement: A Comprehensive Guide to Implementing an Effective Title I Parental Involvement Program* (pages 162-178), to guide the development of the parent survey.

Parent involvement workshops and activities are planned for the following year from the annual survey results. Materials are also purchased for parent resource centers from expressed needs. Many opportunities are provided for building strong parent capacity. The purpose is to ensure effective involvement of parents and to support a partnership among the schools, parents, and the community to improve student academic achievement, at minimum, the following activities: Annual meetings; Conferences; E-mail communications; Phone calls; Parent workshops and activities; Family nights; Volunteering; Parent advisory meetings; Open Houses; Annual notification of CCRPI status; Newsletters/flyers/brochures; Website information; and Board of Education meetings.

Timeline:

- September – schools begin advertising the Parent Survey start dates (school websites, district websites, flyers, daily school announcements, school marquees, etc.) Schools will be required to utilize a minimum of four methods for advertising to parents.
- First school day in October the survey is sent home to parents.
- Survey will be accepted for 15 school days.

Parent Survey data/results will be released to the schools and stakeholders no later than one month after the close of the survey. Results from the survey will be posted on the system website via “The Patriot” Newsletter.

CAPACITY FOR PARENT INVOLVEMENT

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/flyers.

Each principal considers and plans 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?

2. What training has been offered to parents related to literacy and the use of technology?
3. How have faculty and staff been encouraged to communicate with and involve parents in their child's education?
4. What efforts have been made to foster parental involvement in Pre-K programs?
5. What attempts have been made to communicate parental involvement information to parents using language parents can understand?
6. What other support do parents receive for parental involvement activities?

PARENT RESOURCE CENTERS

All schools have parent resource centers. A variety of materials and resources are available to parents for use at the school for checkout, or as handouts. Books, tapes, videos, DVDs, and a variety of other materials have been purchased for the parents. Many purchases are based upon parent requests on the parent involvement surveys (i.e., helping with homework, information regarding bullying). Schools are required to notify parents of the availability of the resources in the parent resource center. This is typically achieved through a flyer and/or websites and includes information on the types of resources available in or through the resource center.

ESSA: EQUITY, PROFESSIONAL QUALIFICATIONS, DATA VALIDATION AND PLPs/PLGs (ESSA: Sec. 1111(g)(1)(B), 1112(b)(2), 2101(d)(2)(E))

Equity Action Plan

The Wilcox County School System Equity Action Plan is revised annually and included in the LEA CLIP submission. The LEA Equity Action Plan Template follows these steps:

- Review of LEA Data
- Choosing Equity Interventions -LEAs select equity interventions based on identified needs.
- Equity Interventions for Reducing LEA Equity Gaps -LEAs describe how the selected equity intervention will be implemented, monitored, and measured for effectiveness in the current fiscal year.

Paraprofessionals: The Elementary and Secondary Education Act of 1965 (ESEA) requires that all paraprofessionals who work in a program supported by Title I funds (schoolwide program or targeted-assistance program) must meet state qualifications. The state of Georgia ensures that it has professional standards for all paraprofessionals working in any school, including qualifications that were in place on the day before the date of enactment of the Every Student Succeeds Act. In Georgia, a paraprofessional employed by a Georgia LEA must meet one of the following requirements:

- Degree: Hold an associate's degree or higher in any subject from a Georgia Professional Standards Commission (GaPSC) – accepted accredited institution; or
- Coursework: Have completed two (2) years of college coursework (sixty [60] semester hours) at a GaPSC – accepted accredited institution; or
- Content Area Test: Have passed the GACE Paraprofessional Assessment. If eligibility is established through the assessment, the applicant must also hold a minimum of a high school diploma or GED equivalent.

- Note: An educator holding a valid Clear Renewable Teaching, Service, or Leadership certificate is considered qualified to serve in a paraprofessional position and does not need to also hold a Paraprofessional certificate.
- All individuals holding a current Paraprofessional certificate in Georgia must meet requirements for certificate renewal. Paraprofessionals who work in a schoolwide program or who are paid with Title I funds and work in a targeted-assistance school may be assigned the following instructional support duties:
 - One-on-one tutoring if the tutoring is scheduled at a time when a student would not otherwise receive instruction from a teacher.
 - Assisting in computer instruction.
 - Conducting parental involvement activities.
 - Providing instructional support in a media center.
 - Serving as a translator.
 - Providing instructional support services.
 These paraprofessionals may not be assigned duties inconsistent with the above list of instructional support duties. Additionally, paraprofessionals may not provide instructional support to students unless they are under the direct supervision of a highly qualified teacher. A paraprofessional is deemed to work under the direct supervision of a teacher if the teacher plans the instructional activities for the paraprofessional, the teacher evaluates the achievement of students with whom the paraprofessional works, and the paraprofessional works in close and frequent physical proximity to the teacher.

20-Day Notifications

In Georgia, in accordance with the Every Student Succeeds Act of 2015, all LEA schools/programs are required to provide timely notice to parents when students have been assigned or taught for four or more consecutive weeks by a teacher who does not meet applicable state certification or licensure requirements (including professional qualifications developed by the LEA in alignment with an approved charter or strategic waiver application) at the grade level and subject level in which the teacher has been assigned. 132 [ESSA Sec. 1112 (e)(1)(B)(ii)]. In Georgia, notification requirements apply to all teachers in all LEA schools/programs. Notifications must be made within ten business days following the four consecutive weeks.

Requirements for Content of the 20-Day Parent Notification

In compliance with the requirements of the Every Students Succeeds Act, parents must be notified of a teacher's professional qualifications under the following circumstances:

- o Regular Education Teachers in Traditional LEAs- When students have been assigned or taught for four or more consecutive weeks by a teacher who does not meet applicable GaPSC 'in-field' state certification requirements at the grade level and subject area in which the teacher has been assigned.
- o Regular Education Teachers in Charter/ Strategic Waiver LEAs- When students have been assigned or taught for four or more consecutive weeks by a teacher who does not meet LEA professional qualification requirements (in alignment with approved Charter/SWSS application and CLIP) at the grade level(s) and subject area(s) in which the teacher has been assigned. Note: It is possible for a teacher to meet charter/ strategic waiver LEA professional qualification requirements and not meet GaPSC in-field requirements. In this circumstance, 20-Day Notification is not required.

o Special Education Teachers in all LEAs- LEAs should use the following criteria to determine when to send 20-Day Notifications for special education teachers: ♣ Special education teachers who do not issue grades- 20-Day Notifications must be disseminated if the teacher does not hold special education certification. ♣ Special education teachers who issue grades- • Special Education Certification- 20-Day Notifications must be disseminated if the teacher does not hold special education certification, and/or • Content Certification - the teacher does not hold certification for the subject area and grade level band in which the teacher issues grades.

o Clearance Certificates- Clearance certificate requirements are not subject to 20 Day Notifications.

o Paraprofessionals and Substitute Teachers- 20-Day Notifications are not required for paraprofessionals and substitute teachers. ♣ Paraprofessionals- ESSA does not include paraprofessionals as educators for whom 20 Day Notifications must be sent. ♣ Substitutes- O.C.G.A. § 20-2-216/ GaPSC Rule 505-20-.20 requires LEAs hiring and assigning substitutes to ensure substitutes meet state certification requirements or to hire substitutes who most closely meet the requirements for teacher certification and who are available to serve as substitute teachers.

In Georgia, notifications must occur within ten business days following the four consecutive weeks. For verification purposes, notifications must contain:

o Day/Month/Year of notification;

o Name of the teacher who has not met professional qualification requirements;

o Name of the LEA and/ or school/program; and,

o Statement that the teacher has not met State certification OR LEA charter/strategic waiver professional qualification requirements for the grade level(s) and/ or subject area(s) in which the teacher is assigned. Grade level and/or subject area must be identified.

In Georgia, notification requirements apply to ALL teachers in all LEA schools/programs. Best Practices for the 20-Day Parent Notification ESSA does not prescribe the exact method of dissemination for notifications. In Georgia, the following are considered best practices when notifying parents: • Develop written procedures for compliance, which include a timeline and person, by position, responsible for verifying notification content, verifying dissemination of notification, and maintaining notification documentation. • Notify parents in a format that will ensure that all parents have the opportunity to receive the information. • Notify parents, to the extent practicable, in a language that they may understand. • Ensure the notification includes school/program/LEA name and a point of contact by position. The WCSS Director of Federal Programs works to disseminate 20-Day Notification information to schools/administrators. Information is shared about Professional Qualifications throughout the year at administrative meetings and through email communication. Schools/administrators are reminded of the timeline for 20-Day Notifications. Copies of the parent notifications and documentation are filed in the Federal Programs Department.

Parent's Right to Request a Teacher's and a Paraprofessional's Qualifications

In accordance with Every Student Succeeds Act (ESSA) of 2015, all LEAs are required to notify parents at the beginning of each school year (or at the time of enrollment of the student) of their 'Right to Know' the professional qualifications of their student's classroom teachers and paraprofessionals. LEA notifications MUST use the language of the law. In compliance with the requirements of the Every Student Succeeds Act, parents may request the following information: 1. 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.

4. Whether the child is provided services by paraprofessionals and, if so, their qualifications. In Georgia, notifications must occur within 30 calendar days from the start of school or upon enrollment. For verification purposes, notifications must contain the month/year of dissemination or, if included in another document, the primary document must contain a date. Or, if the primary document is undated, records may also include supplemental documentation that contains the month/year of notification dissemination. For verification purposes, the name of the LEA and/ or school must be included. In Georgia, LEAs are required to notify parents in all LEA schools or programs. Responses to requests must be provided in a timely manner. Maintain records of annual notification(s) from all LEA schools or programs.

Best Practices for the Notification ESSA does not prescribe the exact method of dissemination for notifications. In Georgia, the following are considered best practices when notifying parents:

- Develop written procedures for compliance, which include a timeline and person, by position, responsible for verifying notification content, verifying dissemination of notification, and maintaining notification documentation.
- Notify parents in multiple formats in order to ensure that all parents have the opportunity to receive the information. This may include, but is not limited to, a LEA or school handbook, a letter mailed home, inclusion in a newsletter or brochure, posting on a website, and/or a schoolwide email.
- Notify parents, to the extent practicable, in a language that they may understand.
- Ensure the notification includes school/program/LEA name and a point of contact by position.

WCSS includes the Parent's Right to Know information in the annual Back to School edition of the Wilcox Marketer and in all student/parent handbooks. All parents can view and acknowledge their right to request the professional qualifications of their student's classroom teachers and paraprofessionals. The Director of Federal Programs places the Right to Know information on the WCSS website with schools, principals' names and phone numbers for parent reference.

TITLE I, PART A – NOTICE TO PARENTS (Sec. 1112(e)(3)(A); Sec. 1112(e)(3)(B); Sec. 1112(e)(3)(D); Sec. 1112(e)(4))

The Wilcox County School System (WCSS) provides a language acquisition program supplemented with Title I, Part A and/or Federal programs director, Part A funds. The district is required to inform

parents of an English learner identified for participation in language acquisition programs no later than 30 days after the beginning of the school year. The district must inform parents of the following:

- The reasons for the identification of their child as an English learner and the need for placement in a language acquisition program.
- The child's level of English proficiency including how the level was assessed

and the status of the child's academic achievement.

- The methods of instruction used in the program that the child is or will be participating in 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 will meet the educational strengths and needs of their child.
 - How the 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 English learners and the expected rate of graduation from high school (including four year adjusted cohort graduation rate and extended-year adjusted cohort graduation rates for such program) if funds are used for children in high school.
 - For students with disabilities, how the program meets the objectives of the individualized education program of the child.
 - Information pertaining to parental rights that includes written guidance:
 - Detailing the options that parents have to request that their child be immediately removed from such program upon 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.
 - Assisting parents in selecting among various programs and methods of instruction if more than one program or method is offered by the district.
- Additionally, for English learners identified during the school year, the district must notify the parents during the first two weeks of the child being placed in a language acquisition program. Students may not be admitted to, or excluded from, any federally assisted education program on the basis of a surname or language-minority status. The notice and information provided to parents must be in an understandable and uniform format, and to the extent practicable, provided in a language that the parents can understand. Additionally, the method of delivery must be secure to protect student information.

NOTIFICATION TO PARENTS OF PARTICIPATING ENGLISH LEARNERS PROCEDURE

The Federal Programs Department work collaboratively to ensure the distribution of letters notifying parents of student eligibility for participation in a language acquisition program.

Initial Notification to Parents of English Learners:

The following process is followed for the initial notification at the beginning of the school year to parents of participating English learners:

- The Federal Programs director runs a report of participating English learners from the student information system.
- The Federal Programs director enters the student's information on a spreadsheet which is shared with Counselor at the schools.

The spreadsheet includes:

- Last name
- First name
- School

- Student number
- Grade
- Enrollment date
- Address
- Placement date
- Mailing date
- The Federal Programs Department staff completes the Title I Parent Notification of Student Eligibility for Supplemental Language Support Services letter for students based on eligibility criteria determined by the LEA. The following fields are entered:
 - Date
 - Student name
 - Test used to determine English skills with score
 - Graduation rate for students that receive additional supports (if applicable)
 - Score that qualifies a child to be placed in the ESOL program
 - The Federal Programs Department staff delivers the dated letters to schools for dissemination.
 - A copy of the letter and statement of dissemination is maintained by the Federal Programs Department for documentation purposes.

Notification to Parents of English Learners Identified During the School Year:

The following process is followed for notification to parents of participating English learners identified during the school year:

- The central registration clerk notifies the Federal programs director and Federal Programs Department staff when a potential English learner has completed the registration process for enrollment in the district.
- The Federal programs director reviews the student enrollment information and contacts the ESOL teacher serving the student's assigned school.
- The ESOL teacher administers the World-Class Instructional Design and Assessment (WIDA) online screener.
- The WIDA screener determines eligibility for the ESOL program.
- The ESOL teacher returns the student's score to the Federal programs director.
- The Federal programs director Administrative Assistant enters the student's information on a spreadsheet which is shared with Federal Programs Department staff. The spreadsheet includes:
 - Last name
 - First name
 - School
 - Student number
 - Grade
 - Enrollment date
 - Address

- • Placement date
- • Mailing date
- The Federal Programs Department staff completes the Title I Parent Notification of Student Eligibility for Supplemental Language Support Services letter for students based on eligibility criteria determined by the LEA. The following fields are entered:
 - Date
 - Student name
 - Test used to determine English skills with score
 - Graduation rate for students that receive additional supports (if applicable)
 - Score that qualifies a child to be placed in the ESOL program
 - The Federal Programs Department staff delivers the dated letters to schools for dissemination.
 - A copy of the letter and statement of dissemination is maintained by the Federal Programs Department for documentation purposes.

Notification to Parents in an Understandable Format:

The Title I Parent Notification of Student Eligibility for Supplemental Language Support Services is sent home to parents of participating students in English as well as their primary language.

Monitoring of Distribution of Parent Notifications for Participating English Learners:

The Federal Programs Department staff work collaboratively to monitor the distribution of the Title I Parent Notification of Student Eligibility for Supplemental Language Support Services. A meeting at the beginning of the year outlines the distribution timeline to ensure that the 30-day and two-week deadlines are met. The Federal Programs director monitors the timeline to ensure distribution occurs by the required deadlines. The record of student enrollment, identification of services, and the dissemination statement of notifications are kept and reviewed on an ongoing basis by the Federal Programs Director.

REQUIRED 1% SET ASIDE FOR PARENTAL INVOLVEMENT

Parental Involvement: Principals have the option of expending the 1% in Parent Involvement funds or submitting them back to the system level. Principals typically decide to direct those funds to a district level parent involvement activity/project by signing a District-wide Parent Activity Assurance form. The funds are used at the district level to fund agenda handbooks and parent meeting materials for all schools.

Timeline: Wilcox County Schools has developed a timeline for all documents associated with Title I & Title II funding. The timeline is displayed on the system's Google Calendar that each principal has access to through the internet. In addition, WCCS provides a Federal Programs checklist to all system and building level administration.

Implementation Timeline:

- All schools will begin the revision process for their *Parent Involvement Policies, School-Parent Compacts, Schoolwide Plans and School Improvement Plans* no later than April 2016.

- The revision process will require that parents are notified and invited to be part of the revision process.
- Schools will provide documentation of invitations (flyers, website printouts, marquee pictures, One Call Now, etc.). A minimum of three different notification methods will be used.
- Schools will provide sign-in sheets indicating parent involvement in meetings where the above mentioned plans were discussed and revised.
- The revision discussions will include the discussions on the “how” the 1% set aside for parent involvement will be spent in each school. (Supported by agendas, minutes and sign-in sheets).

Although the system has established a definite timeline for revisions to start and end, it is understood that the evaluation and revision process is a dynamic entity that occurs on an ongoing basis throughout the school year. The school district will follow the same timeline for the evaluation and revision of the District’s Parent Involvement Policy.

Person/Persons Responsible for Implementation:

- School-level principals are ultimately responsible to ensure that each school follows all rules, policies, procedures and protocols as outlined in the *Federal Programs Procedures and Internal Controls Handbook*, BOE policies, state and federal policies.
- Principals will ensure that all documentation described within this section of the corrective action plan is collected and submitted as required by this plan to the Federal Programs Director.
- Principals will uphold the intent of all regulations, policies, procedures and protocols as outlined in the WCSS Corrective Action Plan, *WCSS Federal Programs Procedures and Internal Controls Manual*, and all other policies outlined in state and federal publications.
- Director of Federal Programs will monitor the compliance to all policies, procedures and protocols both on the school-level and the district level. All submitted documents will be reviewed for accuracy and compliance to local, state and federal policies.
- Revisions will be requested by the Federal Programs Director when submitted documents do not meet the expectations set forth in the rubrics that apply to the PIP, SPC, SWP, etc.
- If needed, noncompliance issues will be directed to the superintendent to ensure total compliance is achieved.

SCHOOL IMPROVEMENT PLANS

School Improvement Plans are created each spring and finalized during the summer for the following school year. Each school leadership team conducts a data retreat at which representatives from each grade level, content area, and department, as well as administration and parents meet to review the existing plan and revise/develop a plan for the upcoming year. School administrators then present the plan at the annual district leadership team meeting in the summer 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.

System leaders also support schools in developing, revising, implementing and coordinating school improvement and schoolwide plans during monthly Superintendent Cabinet meetings and quarterly Federal Program Review meetings. During the meetings, data is analyzed to identify and develop solutions to challenges related to instructional strategies, parent involvement, professional learning, and budgets. Additionally, system leaders attend monthly leadership team meetings at each school. During at least two District Leadership Team meetings, parents are involved in the planning, revising, and implementing phases

of the process. Once revisions are made, the plan is placed on the website. Hard copies are also available at the schools.

SCHOOL IMPROVEMENT 1003(a) INTERVENTIONS

Wilcox County Schools do NOT receive 1003(a) funds.

MONITORING OF SCHOOL IMPROVEMENT

All schools within the Wilcox County School System conduct Title I school-wide programs. This allows all children and all parents an opportunity to have equal access to all related Title I assistance. The LEA utilizes one district School Improvement Specialist to build capacity and support the school improvement process in all schools. All schools within the LEA are involved in school improvement efforts through the work of the LEA, the RESA, and GaDOE. The School Improvement Specialist works with schools to implement practices that have proven effective with improving schools. The District School Improvement Specialist, along with the GaDOE, establishes clear expectations for personnel as they systemically support continuous improvement in all schools.

REVIEW AND APPROVAL OF SCHOOL IMPROVEMENT AND SCHOOL-WIDE PLANS

School Improvement and Schoolwide Plans are updated each spring and finalized during the summer for the following school year. Each school leadership team conducts a data retreat at which representatives from each grade level, content area, and department, as well as district and school administration and parents meet to develop a plan. During school leadership team meetings, instructional strategies, parental involvement initiatives, and professional development activities are planned after a careful analysis of various data. Assistance is also provided to schools in their use of school improvement funds to accomplish initiatives in their school improvement and schoolwide plans. School administrators then present their school plans at the annual district leadership team meeting 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.

PROFESSIONAL DEVELOPMENT, ANALYZING DATA, TECHNICAL SUPPORT AND ASSISTANCE

System leaders support schools in developing, revising, implementing and coordinating school improvement and schoolwide plans during monthly Superintendent Cabinet meetings and school leadership team meetings. During the meetings, data is analyzed to identify and develop solutions to challenges related to instructional strategies, parent involvement, professional learning, and budgets. Professional learning is directly aligned with the needs of the students.

MONITORING USE OF FUNDS

The Federal Programs Director meets with each school periodically to review and provide recommendations for budgeting decisions related to school improvement funds.

SCHOOL IMPROVEMENT 1003(g) (SIG)

School Improvement Grants (SIG), authorized under section 1003(g) of Title I of the Elementary and Secondary Education Act of 1965 (Title I or ESEA), are grants to State educational agencies (SEAs) that SEAs use to make competitive sub-grants to local educational agencies (LEAs) that demonstrate the greatest need for the funds and the strongest commitment to use the funds to provide adequate resources in order to raise substantially the achievement of students in their lowest-performing schools. The Wilcox School System is currently receiving SIG 1003(g) funds. Quarterly reviews are scheduled and completed by the regional Lead School Improvement Specialist. Annual fiscal monitoring is completed by GaDOE fiscal analysts.

SERVICES FOR HOMELESS CHILDREN AND YOUTH

Revised Oct. 12, 2016

Wilcox County School System homeless liaison works very closely with school guidance counselors to assure students receive needed services.

IDENTIFICATION

The Wilcox County School System Federal Programs Director works with school counselors in the registration and counseling processes to identify homeless children. The LEA also coordinates with DFACS, Wilcox County Family Connection Collaborative, and other agencies to identify its homeless children. The Federal Programs Director assesses related needs of the homeless children and youths and plans strategies to meet those needs. Case study information is used to identify related needs such as a need for personal school supplies or tutoring. To identify the educational needs of the homeless children, Wilcox County uses attendance, discipline, and demographic data, as well as grades and achievement test results. Available data and information is used to produce a summary of needs. The LEA requires each school to make a statement providing guidance/direction to teachers in reference to not isolating or stigmatizing homeless children in their individual teacher handbooks. The Special Education Director collaborates with other agencies in order to appropriately identify homeless children in need of special education and related services through Child Find activities.

PROGRAM PROCEDURES

- The district is responsible for identifying a homeless liaison. Currently, the homeless liaison is Mr. Matthew Hall.
- Homeless students will be identified based on the definition prescribed by McKinney-Vento Homeless Assistance Act and via a numeric code in the district's student information system. All staff in the district are trained in the identification and recruitment of homeless students.
- The homeless liaison will provide annual training for all district level and school support staff having contact with homeless students.
- All principals will receive annual training on the identification and needs of homeless students during a Federal Programs Review.
- All schools will display flyers, brochures, and posters that identify the Homeless Liaison contact information.
- Services for homeless students (tutoring, etc.) will be evaluated based on student academic achievement.
- The board of education policy specific to Homeless students will be followed.

SCHOOL SELECTION

The Wilcox School System only has one school per grade span: PreK-5, 6-8, and 9-12. Therefore, school selection is not applicable.

ENROLLMENT

Enrollment of homeless students occurs at the appropriate school to which they are assigned based on their grade level. School counselors who also serve as school registrars are trained and attentive to the identification of homeless students during the enrollment process. Additionally, students and/or parents have an opportunity to mark “Homeless” on their free/reduced application. Applications marked “Homeless” are immediately submitted to the Homeless Liaison for further investigation.

INFORMATION DISSEMINATION

The Homeless Coordinator and/or Principals provide information to faculty and staff on the Homeless Program annually in the fall. The Federal Programs Director distributes posters and brochures in the counselor’s office and Parent Involvement Resource Room in each school. Posters and brochures are also distributed to the community at DFACS, the Wilcox County Health Department, and the Wilcox Family Connection office.

TRANSPORTATION

As with all students served in the Wilcox School System, transportation is provided for homeless students.

FOSTER CARE TRANSPORTATION PLAN

Wilcox County Students placed in Foster Care will be able to attend school in the home county of Wilcox if the family so chooses. A Foster Care Transportation plan is available to provide student transportation to and from a neighboring district if this situation arise. The Foster Care Transportation Plan is on File with the Title I coordinator and system Transportation Director.

DISPUTES

If a dispute arises over any issue covered in this policy, the homeless child or youth shall be immediately admitted to the school in which enrollment is sought, pending final resolution of the dispute. The student shall also have the rights of a student in transition to all appropriate educational services, transportation, free meals and Title I services while the dispute is pending.

The school where the dispute arises shall provide the parent or unaccompanied youth with a written explanation of its decision and the right to appeal and shall immediately refer the parent or youth to the liaison. The liaison shall ensure the student is enrolled in the school of his or her choice and receiving other services to which he or she is entitled and shall resolve the dispute as expeditiously as possible. The parent or unaccompanied youth shall be given every opportunity to participate meaningfully in the resolution of the dispute. The liaison shall keep records of all disputes in order to determine whether particular issues or schools are repeatedly delaying or denying the enrollment of homeless children and youth.

The parent, unaccompanied youth or school district may appeal the liaison's decision as provided in the state's dispute resolution process.

SERVICES FOR NEGLECTED AND DELINQUENT CHILDREN

The purpose of Title I, Part D is to improve educational services for children and youth in local and state institutions for neglected or delinquent children and youth so that such children and youth have the opportunity to meet the same challenging state academic content standards and challenging state student academic achievement standards that all children in the state are expected to meet. The purpose is also to provide such children and youth with the services needed to make a successful transition from institutionalization to further schooling or employment and to prevent at-risk youth from dropping out of school, and to provide dropouts, and children and youth returning from correctional facilities or institutions for neglected or delinquent children and youth, with a support system to ensure their continued education. Currently, there are NO neglected and delinquent institutions within Wilcox County.

In the event a neglected and delinquent institution opens within the county, Wilcox County School System will serve these students using funds set aside in the Title I budget for neglected institutions.

- (a) The Title I Director will work directly with the N & D institution to ensure that students are receiving needed services by meeting with house parents at least annually, more often as needed.
- (b) Meeting minutes, agendas, collaborative planning, emails, phone logs will be maintained by the Federal Programs Director.
- (c) Equipment will be inventoried annually.
- (d) All staff will be trained annually on meeting the needs of neglected students.

CLASS SCHEDULES AND CALENDAR

If N & D students enter our school system, they will attend school on the campus of the Wilcox County School System and follow the same academic calendar and schedules as all students in the school system.

PARENTAL INVOLVEMENT

If N & D students enter our school system, they will attend school on the campus of the Wilcox County School System. Therefore, the Parental Involvement Plan at each school serves as the plan for the families that house neglected students. In addition, house parents of neglected students will receive the same invitations to Parental Involvement activities as all other students in the school system.

PREVENTION AND INTERVENTION PROGRAMS FOR CHILDREN WHO ARE NEGLECTED, DELINQUENT, OR AT-RISK

Wilcox County Schools does not have any state N&D facilities at this time.

TITLE V, PART B – RURAL AND LOW-INCOME SCHOOLS PROGRAM (ESSA: Sec. 5222-5224-5225)

The Rural Education Initiative (REI) is designed to assist rural school districts in using federal

resources more effectively to improve the quality of instruction and student academic achievement.

Rural and Low-Income Schools Program (RLIS)

The RLIS program is an initiative that provides grant funds to rural LEAs that serve concentrations of children from low-income families. An LEA is eligible to receive funds under the RLIS program if:

- 20-percent or more of the children age 5 to 17 served by the LEA are from families with incomes below the poverty line.
- All schools served by the LEA have a school locale code of 32, 33, 41, 42, or 43, as determined by the Secretary of Education.

Eligible systems apply for the RLIS funds through the consolidated application.

Under ESSA, RLIS can fund some of the same activities/resources as in Title I, Part A, Title II, Part A, Title III, Part A, Title IV, Part A, and Parental Involvement activities. Purchases will align to Comprehensive Needs Assessment and Continuous System Improvement Plan

Title V, Part B is a part of the cross functional monitoring cycle which operates on a four year cycle but may be monitored more frequently, as needed.

There is an annual evaluation report requirement for the RLIS grant. This report will be completed in the data collection tab of the Consolidated Application by the Director of Federal Programs.

TITLE II, PART A – TEACHER AND LEADER EFFECTIVENESS

PURPOSE

The goal of the Title II-A program is for each school to have a teaching staff that is highly qualified and effective in helping all students, regardless of individual learning needs, achieve challenging state content and academic achievement standards. A secondary goal is for every student to have an equitable opportunity to receive quality instruction in terms of teacher quality, teacher experience, and class size.

EQUITY BELIEF STATEMENT

The Wilcox County School System believes that all students should have equitable opportunities to quality instructional programs with regard to highly qualified teachers, experience of teachers, teachers' ability to meet the diverse learning needs of all students, and class size. The Wilcox County School System strives to recruit, prepare, train and support high-quality teachers, paraprofessionals and leaders in our school system. We are also focused on developing school and district level improvement plans with measureable objectives that will ensure that all teachers teaching core academic subjects are and remain highly qualified.

ANNUAL NEEDS ASSESSMENT PROCESS

The Wilcox County School System conducts its annual needs assessment in the spring of each year in collaboration with pprincipals, teachers, paraprofessionals, other school personnel, parents, community and business leaders, that addresses each of the following areas:

-*Professional Learning*: Student supports and Interventions, Teacher development, Leader development, and Professional Growth.

-*Personnel*: Recruitment, Retention, and Effectiveness

-*Factors Affecting the Learning and Work Environments*: Climate, Support Programs and Interventions

-*Title II A Administration*: Prioritizing Funds, Needs Assessment/Consultation, and Internal Controls

In addition, input on areas in need of improvement is solicited from school and district leaders by email and during monthly Superintendent Cabinet meetings and District Leadership Team meetings. Feedback is also solicited from parents during the annual Title I meeting, quarterly school council meetings, public community forums, and through our Wilcox Family Connection Collaborative. Information gathered from these various sources is discussed and decisions made on areas of focus by district leaders at Superintendent Cabinet meetings.

EQUITY PLAN

After the aforementioned review processes and completion of the comprehensive needs assessment, school and district administrators meet to develop a district Equity Action Plan. The plan is created in the GADOE template to ensure all required elements are included. The plan includes equity data from multiple sources and outlines interventions to address equity gaps identified in the needs assessment process. The plan includes implementation steps, methods of monitoring and measuring effectiveness of interventions and personnel responsible, as well as a timeline for the process. The Federal Programs Director creates the plan with input from school administrators and follows steps as detailed in the plan. Source documentation (e.g. professional development sign in sheets and agendas, classroom observations, emails, meeting minutes) is maintained at the district office to verify implementation of the plan.

PRIORITIZATION OF NEEDS

Internal and external stakeholders are involved in the planning process by assisting with the prioritizing of needs. Prioritization of needs is accomplished by analyzing the percentage of responses to various questions on the annual needs assessment. In addition, prioritization is discussed with stakeholders during meetings. Information gathered from various meetings is discussed at the Superintendent's Cabinet meetings, consisting of the Superintendent, Assistant Superintendent, district directors, and principals. The Federal Programs Director then combines the feedback from various stakeholders and creates a final prioritized list of needs.

AUTHORIZED USE OF FUNDS

Title II funds can be used for recruitment, retention, professional development, and class size reduction. Title II-A funds must be used to *supplement, and not supplant*, non-Federal funds that would otherwise be used for activities authorized under Title II-A. It is presumed supplanting has occurred in the following circumstances:

- Title II-A funds for services that are required under other federal, state, or local laws
- Title II-A funds for services provided with non-Title II-A funds in the previous year.

Expenditures of Title II-A funds must be necessary to implement an activity designed to meet one or more of the annual prioritized needs, reasonable in costs, and allocable to the Title II-A program.

PROFESSIONAL LEARNING

Professional Learning must be of high quality, sustained, intensive, and classroom-focused in order to have a positive and lasting impact on classroom instruction and the teacher's performance in the classroom and are not 1-day or short-term workshops or conferences. It must also address one or more of the annual LEA prioritized needs. Finally, professional learning must focus on increasing the ability of the teaching staff to help all students achieve high academic standards, or the school administrative staff to lead their schools' efforts to increase student academic achievement

TEACHER EXPERIENCE AND EFFECTIVENESS EQUITY

Teacher effectiveness is measured using two methods. First, four formal focus walks are conducted at each school by administration to gather data that can be used to guide professional learning activities. Secondly, administrators conduct two formal observations as part of the Georgia Teacher Keys Effectiveness System (TKES). Reports are generated in the TLE platform as observations occur and professional learning is planned to meet the specific needs of teachers.

Identified inequities in teacher experience will be addressed at the school and classroom level by re-assigning personnel and students as necessary to ensure that all students have equitable access to experienced teachers. During a Federal Program Review, schedules and class rosters are reviewed to ensure compliance.

A list of inexperienced and ineffective teachers will be maintained at the school level. Rosters will be maintained for students assigned to any teacher on the lists. These rosters will be used the following school year to ensure that students are not assigned to an inexperienced and/or ineffective teacher two years in a row. During a Federal Program Review, schedules and class rosters are reviewed to ensure compliance.

TITLE II A EFFECTIVENESS EVALUATION

The Federal Programs Director will draft a Title II, Part A Effectiveness Plan to assess planned budget expenditures aligned to needs identified in school and district improvement plans. The Federal Program Director utilizes the template located on the GADOE Title II, Part A resources website. The Effectiveness Plan must be submitted prior to budget approval and is uploaded as an attachment to the ConApp. The plan is revised if a budget amendment is submitted due to a change in needs/and/or a significant change in budgeted strategies. Assessment of effectiveness is an ongoing process and is supported by frequent communication between the Federal Programs Director, school administrators, and staff. Before budget completion, the Federal Programs Director will finalize the previous year's effectiveness plan to determine if previous interventions should be continued or if funds should be used to support different interventions.

The Title II A LEA Effectiveness Plan must address:

- The Title II A funded component(s)
- The need(s) being addressed
- Identification of the Title II A funded strategy
- The data to be collected to determine effectiveness

- The position of the person responsible for collecting the data and coordinating the review and analysis of the data
- The timeline for collecting data and completing the review and analysis of the data

CLASS SIZE EQUITY

The LEA will address inequities in class size across and within schools by re-assigning students as necessary to achieve equity. During a Federal Program Review, class size equity is discussed and reviewed to ensure compliance.

MEETING THE DIVERSE NEEDS OF STUDENTS

A minimum of four focus walks are conducted by school administrators as part of the system's implementation of the Teacher Keys Effectiveness System (TKES) to ensure that all classrooms follow the guidelines of a standards-based classroom and monitor the implementation of differentiated strategies. One of the standards assessed is the use of differentiation to meet the diverse needs of students. The data from these focus walks is reviewed and used to plan professional learning initiatives.

PROCEDURES FOR PRINCIPAL'S ATTESTATIONS

Title I office will remind principals to sign their attestation forms for all Title I paid staff. Forms will be signed in September and sent directly to the Title I office. This information will be maintained in the Title I office.

PERIODIC CERTIFICATIONS

Periodic certifications for all Title II paid staff takes place after-the-fact. The process takes place twice yearly. The first one for the year takes place after the first semester and the second periodic certification takes place after the second semester. The forms are signed and kept on file in the Title I office. A Periodic Certification Form that is a (codified in 2 CFR Part 225) requirement that all 100% paid Title II employees must sign a Periodic Certification semi-annually was implemented beginning 2013-2014. The form must be signed by a supervisory official having first-hand knowledge of the work performed by the employees listed on the form and must still be completed semi-annually.

PROCEDURES FOR HIRING INSTRUCTIONAL PARAPROFESSIONALS

Paraprofessional vacancies are posted on the Teach Georgia webpage. A job description is available upon request. Paraprofessional Education Requirements are listed, including:

- Do you currently hold paraprofessional certification?
- or, Do you have a minimum of an Associate's Degree or higher in any subject?
- or, Have you successfully completed a minimum of 60 semester hours or 90 quarter hours of college coursework?
- or, Do you have a minimum of a high school diploma or GED, AND a passing score on the GACE (Georgia Assessments for the Certification of Educators) Paraprofessional Assessment?
- or, Do you have a minimum of a high school diploma or GED, and understand that you must take and pass the GACE paraprofessional Assessment to be eligible for a Georgia Paraprofessional Certificate.

This ensures that the applicants have met the minimum qualifications to be Highly Qualified. Highly qualified applicants are then eligible to interview with principals. Principals make recommendations to the superintendent, and recommended candidates are fingerprinted and complete other employment paperwork.

FEDERAL PROGRAMS DIRECTOR: ENGLISH TO SPEAKERS OF OTHER LANGUAGES

PURPOSE

The goal is to prepare students for success in school and in society through the development of cultural awareness and English language proficiency in listening, speaking, reading, and writing.

STUDENT ASSESSMENT AND ENROLLMENT PROCEDURES

Student participation and progress in the ESOL program is measured using the WIDA ACCESS Placement Test (W-APT) for kindergarteners and the ACCESS exam for students in grades 1-12. All students enrolling in Wilcox County School System are surveyed to determine language background other than English. ESOL instructional support is provided after a student qualifies according to the WIDA-ACCESS Placement Test (W-APT). Eligible students are then assigned to additional services based on need. English Learners (ELs) are assessed annually on the state-adopted English proficiency measure (ACCESS) to determine continued eligibility (ACCESS=Assessing Comprehension and Communication in English State-to-State).

Parents have the right to select ESOL program services, remove their child from the ESOL program upon request, or decline ESOL services. After parents have received notification of student eligibility for enrollment in the ESOL program, they may request a waiver of services. Upon their request the child's teacher will contact the parents to ensure a clear understanding of the services offered. If the parents continue to refuse services, the school will provide a parental waiver of ESOL services form for parental completion.

EXIT GUIDELINES

According to GaDOE guidelines, "In order to exit language assistance services, a Kindergarten student must score an Accountability Composite Proficiency Level (CPL) of 5.0 or higher with no individual domain score less than 5.0. Kindergarten students who do not score an Accountability CPL of 5.0 or higher and who have any individual domain scores less than 5.0 are not eligible to exit language assistance services. Using the Language Assessment Conference (LAC) process to exit Kindergarten students who do not meet the specified exit criteria is not an option.

Students in grades 1-12 who score a Composite Performance Score of 5.0 or higher on the Tier C version of the ACCESS for ELLs and a "Meets Standards" score on the grade level state-mandated reading assessment are considered English proficient and are to be exited from language assistance services. In elementary grades one and two, where no state-mandated reading assessment is administered, an ACCESS for ELLs Composite Literacy Score of 4.7 or higher is used in lieu of the Reading score.

In the absence of a state-mandated reading assessment at the high school level, an English / Language Arts End of Course Test score or English / Language Arts High School Graduation Test score will be utilized in lieu of the reading assessment. In the absence of an English/Language Arts EOCT score in high school, a district may choose to utilize an alternate assessment approved by the district.

According to GaDOE guidelines, “ELs who meet the criteria for proficiency are no longer eligible for language assistance services and must be exited. Federal programs director law requires that districts monitor ELs for 2 calendar years following exit from language assistance services. If an exited student transfers from another state or a private school and the two-year monitoring was not completed prior to enrollment, the district is required to monitor the student for the remainder of the monitoring period. The district must maintain documented evidence that the student was monitored throughout the two-year monitoring phase.” To ease the transition from served to monitored status, ESOL teachers continue to monitor student grades, attendance, and discipline to ensure students are progressing and performing well academically. ESOL teachers continue to correspond with regular education teachers of monitored students if the data indicates students may be struggling in one or more areas. If needed, the ESOL teachers meet with monitored students to assist them in any areas in which they may be struggling.

PROFESSIONAL LEARNING

Administrators meet with regular education teachers of EL students to ensure understanding of the WIDA standards. The counselor will also provide WAPT and ACCESS scores for every student and assist teachers with understanding appropriate expectations based on these scores and the student's level of language acquisition. The results of the annual needs assessment will be used to determine professional learning priorities. GaDOE ESOL staff will be contacted to provide training. A professional learning plan has been developed and is updated annually. At least one meeting will be held yearly with parents of EL students to inform them of ways to assist their students academically, as well as make them aware of school programs and activities.

PROGRAM EVALUATION AND ACCOUNTABILITY

The success of the ESOL instructional program will be measured by analyzing the results of ACCESS and other state mandated tests. As a result of this analysis, differentiated instructional decisions will be made for individual students, including adjusting services if indicated. A biennial Federal programs director program evaluation will be conducted and a report of findings completed. The report will describe the progress EL students have made in language acquisition and meeting specified annual content goals for EL subgroups. The report will also include the number and percentage of EL students attaining English proficiency. Finally, the report will include content area mastery of monitored students.

MAINTAINING ACADEMIC AND ASSESSMENT RECORDS

Academic and assessment records will be maintained for EL students according to state and federal record retention schedules.

TITLE I, PART C – MIGRANT EDUCATION PROGRAM (MEP) SERVICES

The Wilcox County School System uses the occupational survey provided by the MEP coordinator to identify migrant students. A system liaison from the Migrant Educational Program (MEP) makes contact with each migrant family to determine case-by-case eligibility and needs. Migrant students are evaluated academically the same as other students in the system to determine academic needs. All migrant students are eligible for Title I services, and receive appropriate Title I services. In addition a referral is made to student services to indicate that additional services may be needed from that department. Additionally, specific activities to address the needs of migratory families are provided. Such activities shall include informing children and families of, or helping such children and families gain access to other education, health, nutrition and social services. A migratory Parent Advisory Council (PAC)

program is provided in conjunction with other Parent Involvement Programs through the Migrant Education Program (MEP). Parent outreach is provided in a language that is understood by the family if at all possible. The DOE TransAct program and Google Translate is used for translation as well as a private consultant or the high school Spanish teacher when needed. Parents are presented information on ESOL, special education, gifted, and other educational programs. Information on health, nutrition and social services is presented using materials from the migrant educational agency. Presenters from local agencies such as, the Health Department, DFACS, Wilcox County Family Connection and the Wilcox County Extension office may be involved.