



Federal Programs Policies and Procedures Handbook FY23

Chris Houston
Superintendent

101 East Third Street
Greensboro, GA 30642
Phone: 706-453-7688
Fax: 706-453-9019

Revised December 2022

Purpose

The purpose of this handbook is to provide a systematic approach to implementing the regulations of federal programs to ensure compliance with federal guidelines at the system and school level. A description of each federal program along with general information regarding program requirements is included in this handbook. Following the guidelines presented in the handbook will ensure consistency and uniform practices throughout the school system. School level administrators are encouraged to use the information to ensure that federal programs are being implemented accurately and effectively for impacting student achievement.

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

Federal Programs Staff Members

Name	Position/Role	Email Address
Chris Houston	Superintendent	chris.houston@greene.k12.ga.us
Rotonya Rhodes	Assistant Superintendent Title I-A, Academic Achievement Director	rotonya.rhodes@greene.k12.ga.us
Tara Burdette	Curriculum Coordinator Grades 6-12 Professional Learning Coordinator Title II-A Coordinator Title IV-A Coordinator	tara.burdette@greene.k12.ga.us
Laurie Weaver	Curriculum Coordinator Grades PK-5 Title V Rural & Low Income Coordinator	laurie.weaver@greene.k12.ga.us
Kelly Rogers	Special Education Director Title III-A Director Title I-C, Migrant Coordinator	kelly.rogers@greene.k12.ga.us
John Ellenberg	CTAE Director	john.ellenberg@greene.k12.ga.us
Barbara Fuqua	Parental Involvement Coordinator	barbara.fuqua@greene.k12.ga.us
Dean Ware	Chief Financial Officer	dean.ware@greene.k12.ga.us
Connie Wilkes	Fiscal Grant Manager/Federal Programs Coordinator	connie.wilkes@greene.k12.ga.us
CErica Maxey	Social Worker/Homeless Education Liaison	cierica.maxey@greene.k12.ga.us
Laquinta Welbon	Foster Care Point of Contact	laquinta.welbon@greene.k12.ga.us
Dianne Williams	Administrative Assistant	dianne.williams@greene.k12.ga.us

Mission of Greene County Schools

To educate, inspire, challenge, and support students to become college and career ready.

Table of Contents

LEA Monitoring of Schools and Programs	7
Monitoring All Federal Programs (A Description of the GCSS Process)	7
Additional Steps in Monitoring	8
Technical Assistance for All Federal Programs	9
Positions Responsible for Implementing and Monitoring Federal Programs	10
Frequency of Monitoring - Timeline for Monitoring of Federal Programs	10
Documentation of Monitoring	13
Overview of Federal Programs	13
Onsite Monitoring Procedures	16
Verification of Implementation of Required Corrective Action (Audit and Monitoring Findings)	16
Federal Programs Monitoring of Schools & Plans	16
Process for Identification of High-Risk Schools	16
Monitoring of Neglected & Delinquent Facilities	17
Monitoring of Private Schools	17
Data Analysis	17
Reporting and Corrective Action Process (Audit Findings and Monitoring Findings)	18
Results of Technical Assistance	18
Equipment Inventory	18
Safeguards Related to Loss, Damage, or Theft of Equipment	18
Safeguarding Funds, Property, and Assets from Unauthorized Use or Disposition	19
Off-site Use of Equipment	19
Resolution of Audit and Cross Functional Monitoring Findings	19
Comprehensive LEA Improvement Plan (CLIP)	20
Greene County Schools CLIP Review Process for All Federal Programs	20
Selection of Evidence-based Interventions in the CLIP	20
Resolution for Unapproved CLIP	21
Parental Engagement Plan Review Procedure	21
Parental Engagement Coordination and Implementation Procedures	21
Parents' Engagement in Planning, Revision, and Implementation	22
Parental Engagement Activities - Planning, Revision, and Implementation Steps:	22
School Improvement Plan Planning, Revision, and Implementation -Steps:	23
LEA Comprehensive Improvement Plan	23
District Level Title I Parent Engagement Policy Overview	23
School Improvement	24
Procedure for Assisting Schools	24
Professional Development Procedures	24
CSI and TSI Schools Support (School Improvement 1003 (a) Fund Recipients):	26

School Improvement 1003(a) Funding (ESEA: Sec. 1116(b)(3)(A); Sec. 1116(b)(4)(B))	26
School Improvement 1003(a) Budget Development	26
Technical Support and Other Assistance:	27
School Improvement, Corrective Action and State Directed Status	27
Reward School	28
Becoming A Schoolwide School	28
School and District Consequences	29
Schoolwide Plan Development Procedure	29
Creating, Reviewing, and Approving Schoolwide Plans	29
Selection of Evidenced-Based Action Steps	30
Written Procedure for Identifying and Serving Eligible TA Students	30
Description of the Method by Which Children with the Greatest Needs are Selected:	31
Procedure for Enrolling New Targeted Assistance Students	31
Scheduling Models	32
Pre-Kindergarten Programs	33
School Improvement 1003 (g) (SIG)	33
Fiduciary Responsibility	33
Maintenance of Effort Procedures	33
Comparability (Sec.1118(3)(A))	33
Comparability Criteria and Methods	34
Comparability Report Procedures	35
Resource Allocation and Management Plan (RAMP)	35
Allowability Procedures & Budget Procedures	36
Allowability Procedures and Internal Controls	37
Academic Achievement Awards Program	38
Use of Title I Equipment in Schoolwide Schools	39
Use of Title I Equipment in Targeted Assistance Schools	40
Targeted Assistance Schools Equipment Usage	40
Supplement not Supplant	43
Internal Controls	43
Stipends (GA 160-3-3-.04)	44
Purchased Professional Services Payment	45
Cash Management – Draw-Down Procedures	45
Quarterly Reports Procedures	45
Allocations and Carryover	45
Federal Programs Physical Inventory Procedures	46
Greene County Schools Equipment Disposition Procedure	47
Lost Equipment	48
Procedures for Complaints	48

Waste, Fraud, Abuse and Corruption	49
Assessment Security	50
Procedure for Budget Approval by Local Board	50
Accounting Records	50
Split-Funded Personnel	51
Consultants, Contracts, Purchased Services	51
Procurement (CFR 200.319(c))	51
Technical Evaluations of Competitive Proposals and Selecting Recipients (CFR 200.320(d)(3))	52
Conflict of Interest	53
Travel Expenses	53
Periodic Certification	53
Within District Allocation Procedures	53
GCSS Procedures for Reservation of Federal Funds (Set-Asides)	54
Required Set Asides Reservation of Funds	54
Homeless Children and Youth	54
Neglected and Delinquent Children	54
Parent and Family Engagement	55
Rank Ordering and Allocation Procedures	55
Reservation of Funds	56
Equitable Services for Private School Participants	56
Services for Homeless Children and Youth	57
Services for Neglected and Delinquent Children (Neglected Set-Aside)	57
Prevention and Intervention Programs for Children Who Are Neglected, Delinquent, or At-Risk	59
Title V, Part B – Rural and Low Income	59
Title II, Part A, Teacher Quality	60
Needs Assessment and Planning	60
Equity in Student Access to Effective Instruction	61
Effectiveness Plan	61
High Quality Professional Learning	61
LEA Reporting of Professionally Qualified Personnel	62
Professionally Qualified Teachers and Paraprofessionals	62
Parental Notification	64
Special Education Teachers:	65
General procedures:	65
Private School Participation in Title II, Part A	66
Time and Effort	66
Federal Awards Payments	66

Financial and Program Management	66
Inventory and Property Management	66
Title III-A	66
Registration	67
Screening for Eligibility	67
New to U.S. Schools	67
Kindergarten W-APT Screening	68
Eligibility Criteria	68
2nd Semester Kindergarten - 1st Semester 1st Grade	68
WIDA Screener Online Screening	68
Eligibility Criteria	68
Potential ELs with Disabilities	68
In-State and Out-of-State Transfer Students	69
Exit Procedures	69
Kindergarten ELs	69
ELs in Grades 1-12	69
Identification of Immigrant Students	72
Instructional Programs and Resources	72
Services to Eligible Private School Children	74
Timeline for Private Schools	75
AFFIRMATION OF CONSULTATION WITH PRIVATE SCHOOL OFFICIALS	76
Private School Equipment Inventory	77
Title I, Part C - Migrant Education Program Services	77
Individuals with Disabilities Education Act (IDEA)	78
Elementary & Secondary School Emergency Relief (ESSER) Funds	79
Appendix A	81

LEA Monitoring of Schools and Programs

The Elementary and Secondary Education Act of 1965 (ESEA), as reauthorized by the Every Student Succeeds Act of 2015 (ESSA), requires the Greene County School System (GCSS) to monitor the implementation of program requirements and the expenditure of federal funds.

GCSS 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 an essential component of ensuring that all federal programs are being implemented as prescribed ESSA. It is a process of systematically providing technical assistance and collecting data in order to provide information that can guide program implementation.

Greene County's LEA makes use of monitoring to ensure that all activities are carried out in accordance with federal guidelines. Critical to this process is the feedback provided to schools that can assist in improving student academic achievement. District monitoring addresses the following:

- Ensuring that all federal program activities are carried out in accordance to federal compliance guidelines
- Implementation of plans
- Staff management
- Equipment inventory and usage
- Academic performance (achievement and growth)
- Fiscal management

Monitoring All Federal Programs (A Description of the GCSS Process)

The following procedures have been created to guide the LEA and schools in achieving its goals and to promote the effective and efficient operation of programs. The specific requirements are as follows:

LEA/Program Director will conduct self-monitoring of its schools and programs sufficient to ensure compliance with federal program requirements (at schools where applicable), including Title I, Part A, Title I, Part C, Title I, Part D, Title II, Part A, Title III, Title IV, Part A, Title V Part B, Title IX Part A, McKinney Vento Act, IDEA and the Elementary and Secondary School Emergency Relief (ESSER) Act, which includes Coronavirus Aid, Relief, and Economic Security (CARES) Act, Coronavirus Response and Relief Supplemental Appropriations (CRRSA) Act, and the American Rescue Plan (ARP) Act.

LEA/Program Directors/coordinators will undergo training from GaDOE and other sources to maintain proficiency in federal program compliance requirements.

LEA/Program Directors/coordinators will provide technical assistance (outlined later in this document) to local schools.

LEA/Program Directors/coordinators and RESA staff will conduct achievement data reviews with all schools.

LEA/Program Director self-monitoring will include monitoring all program expenditures to verify that all program expenditures comply with federal program requirements.

LEA/Program Director will maintain all documentation LEA may need for future auditing/monitoring.

LEA will undergo monitoring by GaDOE on a published cycle. LEA/Program Director will participate in training and technical assistance updates as provided by GaDOE prior to monitoring visit.

After the on-site monitoring visit, the LEA will receive a comprehensive monitoring report which will contain recommendations, findings, and required actions that together provide an analysis of the implementation of the LEA's Title programs. If a Corrective Action Plan is required, the LEA/Program Director will respond in a timely manner with a Corrective Action Plan which must be approved by GaDOE. Implementation of the Corrective Action Plan will be monitored by the appropriate Federal Program Education Program Specialist.

IDEA-specific procedures can be found in the district's Special Education and Support Services Handbook.

Additional Steps in Monitoring

- During the summer prior to the beginning of the new school year and after the Annual federal programs conference in July, the district convenes a meeting of all school principals. School leaders receive training on policies and procedures and guidance for operating federal programs.
- Principals are provided detailed information of expectations and copies of program guidance.
- Program coordinators share additional information with principals via e-mail, school meetings (if requested by the principals or recommended by the program coordinator), and scheduled district meetings of school Title I coordinators and/or principals.
- District staff conduct at least two formal instructional walkthroughs each year (one walkthrough in the fall and one walkthrough in the spring). During these walkthroughs, district and school leaders visit schools using an instructional walkthrough tool; analyze walkthrough data; and provide feedback to each school.
- The LEA conducts at least three critical issues visits each year with all schools. During these visits, the school leadership team presents their schoolwide plans/action plans (including implementation updates). LEA district leaders provide feedback to each school.
- Federal program updates are provided by program coordinators and directors at Leadership Meetings during the school year.
- Monthly communication takes place between federal program coordinators and federally funded instructional coaches. This includes phone calls, emails and face-to-face meetings. Sharing of best practices is encouraged during face-to-face meetings.
- District Parental Involvement Coordinator communicates regularly with the School Principals providing federal guidance and ensuring that schools meet federal requirements for parental involvement.
- District and school level personnel collaborate on school improvement efforts, communicating through emails, informal and formal meetings and work sessions.
- Annual needs assessments are conducted as a part of the overall school improvement process. All staff members are asked to participate in the needs assessment process.

- A Title I and II timeline is distributed to all principals to ensure deadline awareness and federal grant compliance. Principals also receive budget forms, inventory information, schoolwide implementation guidelines, parental involvement, fraud policy and other areas of Title I information as needed.
- In addition to meeting with principals, Title I district staff also meets with all Title I teachers, Title I Coaches and Title I Parental Involvement Coordinator at the beginning of each year. These meetings are an opportunity to discuss Title I in detail and also an opportunity to discuss content specific information with each of the above. Instructional Coaches also meet with math and literacy teachers on a weekly basis.

Technical Assistance for All Federal Programs

Each grant administrator provides technical assistance on grant implementation through meetings, phone calls, emails and feedback. Technical assistance regarding federal grants is provided throughout the year. Professional learning is provided based on needs but, in addition, professional learning is used as a preventive measure to ensure that all federal grant staff have a clear understanding of all expectations of the federal award.

Technical assistance meetings and professional learning are ongoing and provided by the grant administrator or designee. Meetings include but are not limited to:

- Monthly administrative meetings (All programs)
- Coaches/API Instructional PLC Meeting (monthly) (All programs)
- Comprehensive Needs Assessment and Improvement Plans (All programs)
- New Teacher Orientation (Title I & Title II)
- Systemwide Special Education Meetings (IDEA)
- Positive Behavioral Interventions and Supports (PBIS) Coaches Meeting
- Instructional Technology Training (All Programs)
- Budget and Finance Training for Principals (Title I, Part A)
- Benchmark Assessment & Data Analysis Training

Grant implementation includes the following topics **but is not limited to:**

- Budgets
- Planning
- Compliance Issues
- Parental Engagement
- School Improvement
- Monitoring
- Academic Achievement
- Professional Qualifications
- Fiscal Requirements
- Inventory Management

Specific professional learning is provided on but not limited to:

- Engaging Lessons & Planning for Rigor (Teaching in the Fast Lane) (All Programs)
- Social Emotional Learning (All programs)
- Technology Integration (All programs)
- Literacy strategies (All programs)
- Using assessments (All programs)
- Math (Guided math and effective planning with tasks and manipulatives) (All programs)
- Writing (process) (All programs)
- Youth Mental Health First Aid
- Positive Behavior Interventions and Supports

Grant administrators also provide individual and group support as needed through meetings, phone calls, and emails.

Positions Responsible for Implementing and Monitoring Federal Programs

Positions Responsible for Implementation and Monitoring of Federal Awards

GCSS has assigned grant administrators to oversee all critical ESSA/IDEA and the Elementary and Secondary School Emergency Relief Act (ESSER) requirements of all programs and its implementation at the district and school level (where applicable). The grant administrators responsible are as follows:

- Title I, Part A: Improving the Academic Achievement of the Disadvantaged – Title I Director/Assistant Superintendent of Curriculum & Instruction
 - Homeless – School Social Worker
 - Title I, Part A: Foster Care Program – School Social Worker
 - Title I, Part A: Family School Partnership Program – District Parent and Family Engagement Specialist
- School Improvement 1003(a) – Title I Director/Assistant Superintendent of Curriculum & Instruction
- School Improvement 1003(g) – Not Applicable
- Title I, Part C: Education of Migratory Children – Director of Special Education & Student Support Services
- Title I, Part D: Prevention and Intervention Programs for Children and Youth who are Neglected, Delinquent, or At-Risk – Not Applicable
- Title II, Part A: Supporting Effective Instruction – Professional Learning Coordinator/Gifted Coordinator
 - Professional Qualifications – Assistant Superintendent of Accountability & Human Resources
- Title III, Part A: Language Instruction for English Learners and Immigrant Students - Director of Special Education & Student Support Services
- Title IV, Part A: Student Support and Academic Enrichment – Professional Learning Coordinator/Gifted Coordinator
- Title V, Part B: Rural Education Initiative – Title I Director/Assistant Superintendent of Curriculum & Instruction
- Title IX, Part A – McKinney-Vento Homeless Assistance Act – Not Applicable
- IDEA: Individuals with Disabilities Act – Director of Special Education & Student Support Services
- Elementary and Secondary School Emergency Relief (ESSER) Funds-Fiscal Grants Mgr/Fed Prgm Coord.

Frequency of Monitoring - Timeline for Monitoring of Federal Programs

July

- CLIP Plans due to GaDOE
- School Improvement Plans due
- Administrator Training to review Federal Program guidelines

August

- Occupational Surveys disseminated
- Notification of FY allocations
- Parent Involvement Policy and Plans due
- Parent Right to Know Letters (Handbook) disseminated
- School/Parent Compact disseminated
- Revision of School Improvement and CLIP Plans begins

- Professional Qualification (PQ) status check
- Remediation Plan Development and Monitoring
- Title I Spending Plans due
- Post Parent's Right to Know Letters on school website and in front office informational area

September

- Title I, Part C budget due
- Professional Qualification Notification (where applicable)
- Submit Principal Attestations and Assurances Form
- Facilitation of annual parent meeting
- Deadline for annual Title I & II meetings
- All prior year FY's funds must be spent
- August Time Logs due for Split-Funded Personnel

October

- Title I, Part A and II, Part A, Title IV, Part A, and IDEA budget submissions due
- September Time Logs due for Split-Funded Personnel
- Submission of School/Parent Compact samples
- Deadline for sharing School Improvement Plan with parents
- Fall District On-Site Visit and Monitoring of Federal Programs begins

November

- October Time Logs due for Split-Funded Personnel
- Fall District On-Site Visit and Monitoring of Federal Programs ends

December

- Review/share CCRPI data
- November Time Logs due for Split-Funded Personnel
- Mid-year progress report on Federal Program implementation due to Superintendent/Assistant Superintendent

January

- December Time Logs due for Split-Funded Personnel
- Federal Program reminders and updates
- Periodic Certifications due
- Recheck Professional Qualification status for all staff
- Inventories due

February

- January Time Logs due for Split-Funded Personnel
- Winter District On-Site Visit and Monitoring begins

March

- February Time Logs due for Split-Funded Personnel
- Winter District On-Site Visit and Monitoring ends
- ESOL presentation to staff

April

- March Time Logs due for Split-Funded Personnel
- Needs Assessment Process Begins

May

- Students and Faculty/Staff Title I Surveys Window Closes
- April and May Time Logs due for Split-Funded Personnel

- Begin review/revisions of Title I Parental Involvement, Title I Schoolwide Plans, and School/Parent Compacts
- Parent, Students, and Faculty Survey Windows Opens
- Principal Professional Qualification sign-off

June

- Equity plan due
- Superintendent Professional Qualification sign-off
- Names and positions (anticipated) of federal programs personnel for next FY due
- Periodic Certifications due

Periodic

- August-September- Work with principals on annual revision of plans (same time school improvement plans are due to the Assistant Superintendent); The Title I Coordinator reviews the plans and the budgets to insure that funds are being spent according to the plan and the plan has all the necessary components.
- August – June – Monthly meeting with Principals. Additional training as needed.
- August – June - Inventory all items purchased by Federal Programs.
- August – June – Homeless and N&D programs are monitored by the Parental/Homeless/N&D Coordinator.
- March-May- Send the Annual Survey of Parent Involvement to parents to provide information as a means of gauging parental involvement activities and whether or not they are working. Schools compile data at their site to determine needs for the following year. The Parental Involvement Coordinator compiles data to determine the needs for next year.

Ongoing Throughout School Year

- Self-monitoring
- Bi-monthly review of budgets
- Participate in GA Department of Education Title I and other federal programs webinars, regional meetings, and training
- Inventory and tagging of all items purchased with federal funds
- Classroom walkthroughs
- TKES/LKES implementation
- Remediation plan development and monitoring
- Hold school-level parent involvement activities and meetings
- Principals will discuss progress toward SIP goals with Leadership Team and teachers
- Update system/school websites – CCRPI, Title I/II Plans, Schoolwide Plans, Parent Resources/Support, Notifications
- Provide Technical Assistance to schools (administrators, bookkeepers, and parent coordinators)
- Budgets and purchase orders are reviewed monthly by the Federal Program Coordinator to assist schools in spending the funds as planned.
- Review of school improvement data and plans in conjunction with other central office staff and peer reviews of plans and status. (principals)
- Visits to Title I/II Schools, CSI and TSI Schools in order to ensure compliance
- Review of school improvement data and plans in conjunction with other central office staff and peer reviews of plans and status.
- Review of requisitions/purchase orders by federal program coordinator as received.

Monitoring also takes place online. School Improvement Plans (SIP) that include data that drives student achievement are monitored by the Assistant Superintendent/Title I Director on an ongoing basis. Principals are required to make changes to SIPs as requested by the Assistant Superintendent/Title I Director. In addition, all schools developed a school-wide/ targeted assistance plan that will be used to monitor data.

Schoolwide/ targeted assistance plans are reviewed annually by the Title I Director. Feedback is sent to each principal via the schoolwide checklist. Corrections to the plans are made as needed by principals once the plans have been reviewed by the Title I Director.

Documentation of Monitoring

Each grant administrator will retain documentation to support monitoring, implementation, and evaluation of their respective grant. Documentation for all programs includes:

- E-mails or other communications between the LEA and individual schools
- Logic Models
- Important Dates and Meetings Calendar
- Professional Learning Days
- Comprehensive Needs Assessment and Improvement Plans/School Action Plans
- Meeting agendas, sign-in sheets, and supporting documentation
 - General meetings, professional learning, and technical assistance Substitutes
 - Stipends
 - Contract services
- Technical assistance from the LEA to schools
- Equipment inventories
- Budgets and supporting worksheets
- List of federally funded employees
- Purchased Professional Services Contracts and supporting documentation
- Timesheets
- Drawdown Requests
- Federally-funded teacher schedules

Overview of Federal Programs

Title I, Part A

The Title I program is designed to support state and local school reform efforts tied to challenging state academic standards in order to reinforce and enhance efforts to improve teaching and learning for students. Title I programs must be based on effective means of improving student achievement and include strategies to support parental involvement.

The purpose of a Title I program is to help low-achieving students meet the state's challenging academic content and performance standards. The Title I program offers a variety of services which may include additional teachers and support staff, extra time for instruction, a variety of teaching methods and materials, smaller classes and additional training for staff.

Title I Part A, School Improvement

The Title I, Part A, Section 1003(a) school improvement grant provides financial resources to LEAs on behalf of the Title I schools identified as Comprehensive Support & Improvement (CSI) or Targeted Support and Improvement (TSI) schools. This grant is awarded to support implementation of school improvement plans required by ESSA and Georgia's ESSA Flexibility Waiver approved by the United States Department of Education.

Title I, Part A Foster Care

Specific Procedures related to enrolling and withdrawing students in foster care are addressed through GCSS Policy Regulations JBC-5 as guided by OCGA rule 160-4-8-.17 and OCGA rule 160-5-1-.28. Annually, transportation related agreements are reviewed and renewed between the LEA and Local Department of Family and Children's Services related to placement of students in foster care, per ESSA. The approved agreement, Greene County Foster Care Transportation Plan, is available upon request. The LEA also has designated a Foster Care Point of Contact, who provides case management services as needed per ESSA and the above referenced OCGA rules. Students placed in foster care are allowed similar rights, protections, and processes for school access and stability that are outlined for students experiencing homelessness per McKinney-Vento Law.

Title I, Part C Migrant Education

The Migrant Education Program (MEP) is a federally-funded program designed to support comprehensive educational programs for migrant children to help reduce the educational disruption and other problems that result from repeated moves. The purpose of the MEP in Georgia (and the United States) is to ensure that migrant children fully benefit from the same free public education provided to all children and that the unmet education-related needs resulting from their migrant lifestyle are met. The Georgia Department of Education is the direct recipient of Title I, Part C funds and is therefore responsible for ensuring the appropriate and best use of these funds. Greene County does not receive direct funding for Title 1-C.

The U.S. Department of Education established *7 Areas of Concern Unique to Migrant Children and Youth*. These concerns guide the work of the MEP in Georgia:

1. Educational continuity
2. Instructional time
3. School engagement
4. English language development
5. Educational support in the home
6. Health
7. Access to services

Upon enrollment in the Greene County School System, parents complete an Occupational Survey. The Central Registration Clerk collects the surveys and provides them to the Title 1-C office. Since Greene County is in the Migrant Education Program (MEP) Consortium, these surveys are sent to the Georgia Department Region One Migrant Education Program for determination of eligibility. Eligible students are coded as "Migrant" in the Student Information System (SIS) by the SIS clerk. The Greene County School System works cooperatively to provide information to the Consortium related to students identified as Migrant including, but not limited to enrollment, transfers into and out of the district, academic progress, additional interventions provided to students, and other information requested or required by the Consortium representative. Migrant students are eligible for any program, intervention, or supports offered to other students in the Greene County School System.

Title II, Part A

Title II, Part A funds are used to:

- increase academic achievement by improving the effectiveness of teachers, principals, and other school leaders.

Title II, Part A focuses on equity to:

- increase student achievement consistent with challenging state academic standards,
- improve the quality and effectiveness of teachers, principals, and other school leaders,
- increase the number of teachers, principals, and other school leaders who are effective in improving student academic achievement in schools, and

- provide low-income and minority students greater access to effective teachers, principals, and other school leaders.

Title III, Part A

The purpose of the state-funded ESOL program is to assist students in developing proficiency in the English language, including listening, speaking, reading, and writing, sufficient to perform effectively in the currently assigned grade level. The purpose of the federally-funded Title III supplemental program is to ensure that limited English proficient students develop English proficiency and meet the same academic standards that other children are expected to meet. Title III funds are used to supplement both state-funded ESOL and other Title (federal) programs.

Under the Every Student Succeeds Act (ESSA) P.L. 115-141, enacted March 23, 2018, awards subgrants to eligible Local Education Agencies (LEA) “to help ensure that English learners (ELs), including immigrant children and youth, attain English proficiency and develop high levels of academic achievement in English.” [Sec. 3102 (1)] School districts with EL populations larger than the minimum threshold receive direct Title III, Part A allocations, while school districts with EL populations less than the minimum are eligible to form or join a Title III-A Title III holds students accountable for progress in, and attainment of, English language proficiency as measured by the ACCESS test Upon attainment of English language proficiency, students exit from supplemental language services.

English to Speakers of Other Languages (ESOL) is a state-funded instructional program for eligible English Learners (ELs) in grades K-12 (Georgia School Law Code 1981, § 20-2-156, enacted in 1985). The ESOL program is a standards-based curriculum emphasizing academic and social language development. ESOL coursework is based upon the WIDA Consortium English Language Development (ELD) standards.

Students who are served in the ESOL program are required to complete an annual state assessment, which is called the ACCESS. Certain program exit criteria are in place and must be followed as part of the eligibility process. Schools and districts are required to meet the Annual Measurable Achievement Objectives (AMAO's) as part of the federal regulations for Title III, Part C.

Additional details for the Title III, Part A program are provided on page 66 of this handbook.

Title IV, Part A

Authorized in December 2015, ESSA introduced Title IV Part A, Student Support and Academic Enrichment (SSAE) grants which are intended to improve students' academic achievement by increasing the state and counties capacity to:

- Provide all students with access to a well-rounded education,
- improve school conditions for student learning, and
- improve the use of technology in order to improve the academic achievement and digital literacy of all students.

Title V, Part B Rural Education

The Rural Education Achievement Program (REAP) is designed to assist rural school districts in using Federal resources more effectively to improve the quality of instruction and student academic achievement. A component of REAP is the Rural and Low-Income Schools (RLIS) program. The program provides grant funds to rural LEAs that serve concentrations of children from low-income families. Under the RLIS program, the U.S. Department of Education awards funds by formula to State Education Agencies (SEAs) to provide sub grants to eligible LEA's to support a range of authorized activities to support student achievement in order to meet the State's definition of adequate yearly progress.

Onsite Monitoring Procedures

All federal fund recipient schools are subject to ongoing monitoring by district personnel throughout the school year. Program directors ensure the conducting of on-site monitoring of all schools a minimum of two times per year for compliance, where applicable. The first visit usually takes place during the first semester, and the second visit takes place during the second semester. This monitoring consists of question-and-answer sessions about school wide plans (action plans) with principals and their leadership teams; and reviews of school budgets. Feedback is provided to the principals via descriptive information. In addition, emails, staff meetings, and phone conversations take place throughout the year as a means of providing ongoing monitoring and communication with each school.

Verification of Implementation of Required Corrective Action (Audit and Monitoring Findings)

Corrective action from a previous monitoring is discussed with principals in order to assist them in understanding the critical need for compliance in federal programs. Professional learning is provided based on needs. In addition, professional learning is used as a preventive measure to ensure that all federal programs personnel have a clear understanding of all expectations for every facet of their program. The Title I Director, along with district level staff (including other federal programs coordinators), and outside consultants, provide on-going training as a means of ensuring that all federal programs staff are in compliance at all times. Upon completion of onsite visits, federal programs staff document areas in need of completion and/or correction and provides detailed findings reports to school principals, clearly articulating required corrective action with due dates.

The applicable grant administrator will follow-up on the identified issue to ensure that corrective action has been implemented. Documentation that the corrective action has been met will be maintained by the grant administrator.

In the event that the administrator does not comply with the corrective action, the administrator's supervisor will be involved to ensure compliance.

Federal Programs Monitoring of Schools & Plans

- Principals or their designees submit their plans (Schoolwide plans/school improvement plans/action plans) to the Title I director who shares these with other federal program coordinators. The principals or their designees submit their parent involvement plans to the district parent involvement coordinator.
- The Title I director, other federal programs coordinators (and parent involvement coordinator for parent involvement plans) review the documents.
- The program director/coordinator communicates with the principal or designee via e-mail, phone calls, and/or onsite meetings regarding the plan. If corrective action is needed, the specific actions are noted in the director's communication to schools.
- Once the plans have been revised and completed, the principal or designee resubmits the plan to the director/coordinator.
- The director/coordinator reviews the plan again and repeats the process of revisions, corrections, and communication with schools until the plans are complete.

Process for Identification of High-Risk Schools

Schools are categorized as no risk, low risk, medium risk, and high risk.

- No Risk: Schools have a CCRPI score of 90 or higher. The school leadership has been in place for at least three years. The teacher attrition rate of 5% or less.
- Low Risk: Schools have a CCRPI score of 85 – 89. The attrition rate is 6-10%.
- Medium Risk: Schools have a CCRPI score of 75-84. The attrition rate is 11 – 20%.
- High Risk: Schools have a CCRPI score less than 75. The attrition rate is higher than 20%. Schools have a designation as "CSI" or "TSI."

Monitoring of Neglected & Delinquent Facilities

At this time there is not a N&D facility in Greene County. Neglected and Delinquent facilities are identified via the GaDOE's website. Once facilities are identified, the N&D coordinator contacts the facility director to determine if there are students enrolled. The needs of the facility are discussed in detail and presented to the Title I Director for inclusion in the budget. Ongoing emails and phone calls are made to each facility. In addition, the coordinator visits each facility on an annual basis and on an as needs basis. Emails and phone calls are kept on file.

Monitoring of Private Schools

Except for the ESSER grants, none of the Private Schools have elected to participate in our federal programs at this time.

Private schools are monitored by the Assistant Superintendent. Consultation meetings take place during the Fall of the year. Communications between the Assistant Superintendent and private schools are kept on file and shared with other federal program coordinators as needed.

Data Analysis

Data review for all schools are compiled and discussed during Leadership meetings and at the Board of Education meetings throughout the year. Schools meet in Leadership teams and analyze data with the intent of improving instruction. All schools have data rooms that are used during the data analysis process.

Principals are required to discuss school improvement data with all staff to ensure that they fully understand the data presented.

Principals meet individually with the Assistant Superintendent/Title I Director.

Principals are required to demonstrate to the Assistant Superintendent (Title I Director) that they fully understand the needs of their school by answering several questions related to their SIP/SWP/Action plan. This information is discussed in detail in the updated schoolwide plans each year.

School Improvement Plans are reviewed by the Title I Director and feedback is provided based on the plan submitted.

Annually school leaders participate in a district data walkthrough.

All purchases/costs incurred with federal funds must be for the purpose of impacting student achievement and the schools' making required improvement in order to be approved by the federal program director.

Principals are required by the district to analyze data and inform all staff of how this analysis will impact student achievement plans. Solutions for identified concerns are developed in the areas of a) instructional strategies, b) implementing requirements for parental involvement, c) identifying effective professional learning and d) analyzing and revising the school's budget so that resources are allocated efficiently. In addition, this data analysis will be used to revise school wide and targeted assistance plans.

All budgets must indicate the evidence base or a logic model for the purchase and how the item will impact student achievement and the schools' making required improvement before being approved by the Title I Director and other federal programs coordinators.

Expenditure detail reports are generated and analyzed by program coordinators for grant compliance in utilization of program funds.

Reporting and Corrective Action Process (Audit Findings and Monitoring Findings)

Corrective action from previous monitoring is discussed with principals in order to assist them in understanding the critical need for compliance. Professional learning is provided based on the needs but, in addition, professional learning is used as a preventive measure to ensure that all federal program stakeholders have a clear understanding of all expectations of federal programs.

In the event that there are new findings, the LEA will immediately create and implement a corrective plan to address findings with the assistance of the district Leadership Team and building principals. The plan shall include measurable objectives and goals, strategies, person(s) responsible, materials needed, timeline for implementation, and means of evaluation. Monthly meetings will be scheduled with the principals to ensure that progress is being made and findings are addressed and corrected. Updates will be provided to the superintendent on a monthly basis.

Results of Technical Assistance

The Title I Director and other federal program coordinators require file maintenance of all training conducted throughout the year. Documentation includes handouts, sign-in sheets, meeting agendas, meeting notes, etc. Ongoing monitoring training provided is conducted by the LEA ensuring that all schools are in compliance.

Equipment Inventory

Acquisition of equipment:

All purchases with Federal Programs (Title I-A, Title I-C, Title II-A, Title III-LEP, Title III – Immigrant, Title IV-A, Title IV-B, Title V-B, Title IX-A, IDEA, the Elementary and Secondary School Emergency Relief Act (ESSER) funds will be made only after proper approval (electronic approval through the Doc-e-fill system) by the Federal Programs Director. Purchases must be allowable, supplemental, consistent with academic assessment needs, and costs deemed as reasonable and necessary for operating federal programs. Federal funds are not to be used for general expenses required to carry out other responsibilities of a state or its sub recipients. Regardless of cost, items will be included on the inventory if they have a shelf life of more than one year. Books and consumable items are not included in the inventory.

Safeguards Related to Loss, Damage, or Theft of Equipment

Every effort must be made to prevent loss, damage, or theft of equipment. The first strategy to safeguard equipment is to maintain an up to date inventory. In addition, all items must have an inventory/asset tag or other labeling approved by the appropriate federal program coordinator. An annual inventory will be completed each fall by federal program coordinators and/or designee. Replacement of lost, stolen, or damaged equipment will be handled on a case-by-case basis with the ultimate decision resting with the Superintendent. Depending on the situation, individuals may be asked to provide a comparable replacement device or pay a monetary amount comparable to the actual cash value of the device.

In the event equipment or technology purchased with federal funds is intentionally damaged or stolen, the following procedure will be followed:

- File an incident report with the School Resource Officer (SRO) (see Appendix for Equipment Disposition Form).
- Attach the incident report to a Disposal Form and email documents to GCSS Federal Programs Director.
- Make corrections to the inventory in Destiny.

- Send an email notifying the appropriate Federal Program Coordinator that the inventory has been updated.

Safeguarding Funds, Property, and Assets from Unauthorized Use or Disposition

To ensure authorized use, inventory is conducted annually to determine location, condition and appropriate use of federally purchased equipment. Materials and equipment will be disposed of following the County's disposition of property procedure, using the district's verification of disposal form. Although every effort is made to repair and/or refurbish equipment to extend its usefulness, the inventory administrator determines when Federal Programs inventory equipment is broken or obsolete. Broken and obsolete equipment is removed from use and marked for disposal. Marked equipment is presented to the Greene County Board of Education which approves for disposition. Equipment is then physically removed from the district by a third party which disposes of the equipment in an environmentally friendly method. In the event that a federal program is no longer available or the equipment is no longer effective/obsolete, federally purchased equipment will be transferred equitably to the inventory of another functioning program. Equipment with an acquisition cost of less than \$5,000 which is at least five years old and no longer effective is purged or transferred to another location. When transferring federal inventory, the order of priority is: an existing federal program (such as another Title I school or another program such as Special Education); then local programs. Every effort should be made to transfer the equipment into a capacity where it continues to serve its original intent of purchase. Inventory spreadsheets will indicate the disposition date for three years, before being permanently removed/archived from inventory records.

Maintenance procedures to keep the property in good condition:

The Federal Programs Director will work cooperatively with the Technology Services Department to ensure that equipment is properly maintained to ensure longevity. Accurate records will be maintained about the current condition of equipment purchased with federal funds.

Off-site Use of Equipment

Every precaution must be taken to ensure that equipment used off-site by personnel and students is used for academic purposes and that the equipment is returned at the end of use free of damage and in good working order. Detailed records must be maintained on the equipment, its location, to whom it is checked out, and when it is returned (see Appendix for Off-site Equipment Usage Form).

Resolution of Audit and Cross Functional Monitoring Findings

Greene County Schools makes an ongoing effort to comply with all federal programs requirements. The Finance/Federal Programs Office makes a continuous effort to cooperate with state and federal auditors and state monitors.

All corrective actions through the audit process or Cross-Functional Monitoring findings are fully implemented.

Steps to Audit/ Monitoring Resolutions:

- Once the audit/ Cross-Functional Monitoring report is received, the federal programs coordinator 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 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.

Comprehensive LEA Improvement Plan (CLIP)

Greene County Schools CLIP Review Process for All Federal Programs

The LEA Comprehensive Improvement Plan is updated annually by Greene County's designated administrators. The Greene County School district will use the Online CLIP option. The first step in the process is for federal program directors/coordinators to participate in the GaDOE CLIP webinar. In addition to the federal program coordinator and assistant superintendent being required to participate in the planning, revision, and implementation process, parents, Title I principals, and business leaders are also asked to serve on the revision committee. Title I parents are sent information inviting them to participate via mail, email, telephone, flyers, website, and newsletters. Parents are asked to provide written input during this process. The district conducts an annual survey each year that allows parents to provide input on district policies and procedures. The district's assistant superintendent oversees this survey, and provides results to the district federal programs coordinator as CLIP revisions are made. Parent input is examined and considered from these surveys. Documentation includes sign-in sheets, agendas, meeting minutes, emails, and returned plans with comments. The Title I Director gathers all input and updates the plan. The plan is submitted to the Superintendent for final approval before submission to the GaDOE.

To ensure stakeholder input and timely submission to the GaDOE, the following timeline will be followed:

- August through July - The newly approved CLIP is made available on the district website. A feedback form is provided on the web.
- August through July – The newly approved CLIP is made available to parents in a parent information notebook at the front desk of each school. A printed feedback form is provided in each notebook.
- August-October – The current CLIP is made available during a district parent meeting.
- February-April – The current CLIP is made available during school Title I Planning Meetings and opportunities are provided on paper and online for feedback. Survey responses will be collected as part of the annual Comprehensive Needs Assessment.
- April-June – Changes are made to the CLIP based on feedback obtained from multiple means and stakeholders.
- May-June – The CLIP is uploaded for GaDOE approval.

Selection of Evidence-based Interventions in the CLIP

Evidence-based action steps are addressed within the district's CLIP. The district uses the "Plan, Do, Check, Act" method for school improvement planning. Our method includes the following steps:

- Based on demographic, process, perception, and student achievement data, school and district leaders write a plan for improving student achievement.
 - o The plans include identified needs; an examination of progress; the creation of goals; the selection of evidence-based interventions to meet the goals; implementation of the plan; progress checks.
- Schools create goals and evidence-based actions to help achieve their goals. The schools enter their action steps into a district template, which includes a description of the action steps, person responsible for monitoring, resources needed, and timelines.
 - o This completed template composes our school action plans/Schoolwide plans.

- All interventions are maintained on a form accompanying the plan. The form lists whether an intervention has strong, moderate, or promising evidence. Interventions that do not have either level of evidence are placed onto a different form – a logic model, justifying the selection of the intervention.

Resolution for Unapproved CLIP

If the GaDOE requests revisions to any portion of the CLIP (CLIP Questions, Family and Parent Engagement Policy, Equity Action Plan, Foster Care Transportation Plan, and/or Title I, Part C, ID&R Plan), the Director of Federal Programs will retrieve the requested changes from the Audit Trail in the SLDS portal. The Director of Federal Programs will then communicate with the appropriate school or district based personnel to ensure that requested changes are completed. The Director of Federal Programs will provide technical assistance as appropriate, make corrections and/or approve corrections to the appropriate CLIP components and then resubmits the plan. This process is continued until the plan has been approved by GaDOE.

Parental Engagement Plan Review Procedure

The Greene 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.

Each school reviews Parent Engagement Policy at a Title I Parent meeting to update plans. Updated Parent Engagement Policies with minutes of meeting will be presented to the parent engagement coordinator to be added to the district website.

The district consults the GaDOE Parental Liaison for technical assistance, as needed. The purpose of technical assistance is to review policies and procedures and to ensure that all federal mandates under the Elementary and Secondary Education Act (ESSA) are in place at each school.

The district's parent engagement coordinator ensures the coordination and implementation of parent engagement in Title I schools. The district's coordinator meets with school personnel and parents. During these meetings, policies, procedure and federally mandated parental engagement activities are discussed/ reviewed. District events and school workshops are used to provide parents with information on improving student achievement and other relevant topics. Parents are able to access support materials through school resource centers.

Each school is mandated to ensure that all areas of parental engagement are in compliance with federal guidelines. The district's parent engagement coordinator provides the school Title I coordinators with the compliance guidelines and reviews parent engagement documents and programs with the coordinators for adherence and guidelines. Ongoing technical assistance and monitoring at the schools to provide individual guidance throughout the school year is also provided by the district parent engagement coordinator. All schools are required to submit their final Parental Engagement Plan, Parental Engagement Compact and Parental Engagement Workshop documentation to the district.

At the beginning of each school year, the school will send the Parent Engagement Policy home with each student.

All schools are required to conduct annual surveys to determine parental needs. This information helps guide parent engagement staff in determining the various workshops and activities for the school year.

Parental Engagement Coordination and Implementation Procedures

Each Title I school is required to have a staff member serve in the capacity of Parental Liaison to ensure coordination and implementation of parental engagement in the schools.

Our goal is to provide ongoing support and services so that our parents and schools build capacity through parental engagement as we strive to ensure the success of all students. The district provides parents with materials and training through the Family Resource Center, other county agencies, and at individual schools on literacy training, child development beginning at the birth of a child, technology instruction, student achievement, and teaching student's responsibility and respect through social emotional learning literature and updates. Parent orientation/academies takes place yearly where parents are afforded opportunities to learn in a large group setting or within school clusters. The annual surveys dictate the training to be offered to parents. In addition, workshops are added as needed based on the relevant topics of parents in each school. These communications, both written and verbal, are translated for parents who speak a language other than English. If transportation and childcare are found to prevent parents from participating, these services are made available for academic events.

Schools are required to maintain the following documentation that ensures the six requirements of parent engagement are offered:

- Meeting agendas and sign-in sheets
- Newsletter articles
- Letters to parents
- Parenting classes

The Parent Liaison, school personnel, and parents begin work in August of each year. Based on the evaluations and the end of year survey, the committee will plan events and activities designed to remove barriers for parents.

Parents are notified via email, calling system, regular mail, phone calls, schools/district website, and flyers in student book bags. Information is also given out during the Annual Meeting and parent workshops.

Parents' Engagement in Planning, Revision, and Implementation

Parents are informed by written notification that they have the right to participate and become involved in the decision-making process at Title I schools. All parents are invited to participate and to provide input into deciding on activities, School Improvement Planning, and the Comprehensive LEA Improvement Plan. These processes are in place to ensure parents play an active role in improving student academic achievement.

Parental Engagement Activities - Planning, Revision, and Implementation Steps:

Provide Annual Notification to Parents: Each school conducts a meeting at the beginning of each year inviting parents to participate in the planning process. The notifications are distributed to parents via mail, email, telephone, flyers, website, and/or newsletters.

Select Parents for Engagement in Committees. Parents are invited to participate in planning the parental involvement activities. The notifications are distributed to parents via mail, email, telephone, flyers, and newsletters.

Conduct Annual Survey at Each School: The annual surveys serve as the means for parents to become involved in planning parent engagement activities. Surveys are conducted in the spring and again during the first of the year to assist in making the determination of the activities for the year. The notifications are distributed to parents via mail, email, telephone, flyers, website, and newsletters.

Evaluate Results of the Survey: This information is used to determine the specific needs of the parents. The notifications are distributed to parents via mail, email, telephone, flyers, website, and newsletters.

Conduct District Annual Survey: At the end of each year, the district conducts an annual survey that allows for parent input. This information is analyzed by school and allows for district input for parents.

Maintain Records: This documentation will include sign-in sheets, agendas, meeting minutes, emails to and from parents.

School Improvement Plan Planning, Revision, and Implementation -Steps:

School Improvement Plans are updated annually. Parents are a required component in planning, revision, and the implementation process. Parents are sent information inviting them to participate via mail, email, telephone, flyers, website, and newsletters.

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

Maintain Records: This documentation will include sign-in sheets, agendas, meeting minutes, emails to and from parents.

Schoolwide/TA School Improvement Plans Planning, Revision, and Implementation - Steps

Schoolwide/TA School Improvement Plans are updated annually. Parents are a required component in the planning, revision, and implementation process. Parents are sent information inviting them to participate via mail, email, telephone, flyers, website, and newsletters.

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

Maintain Records: This documentation will include sign-in sheets, agendas, meeting minutes, emails to and from parents.

LEA Comprehensive Improvement Plan

The LEA Comprehensive Improvement Plans is updated annually. Parents are a required component in the planning, revision, and implementation process. Parents are sent information inviting them to participate via mail, email, telephone, flyers, website, and newsletters.

Parents are selected to participate during the process of revising the plan. Parent input is requested via meetings, via mail, email, telephone, flyers, website, and newsletters.

Maintain Records: This documentation will include sign-in sheets, agendas, meeting minutes, emails to and from parents.

District Level Title I Parent Engagement Policy Overview

Greene County has an ongoing commitment to our Title I parents. Parental engagement 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, as they are the child's first teacher. As a conduit for their children's success, the district will assist parents of all socioeconomic levels, cultural backgrounds and languages in solidifying their ongoing commitment to their child's success. It has become evident that parents can be the foremost factor in ensuring that their children accomplish and excel in the goals they set. Studies (A New Wave of Evidence: The impact of School, Family and Community connections on Student Achievement, 2002) have shown that students with involved parents, no matter what their income or background, are more likely to:

- Earn high grades and test scores and enroll in higher level programs;
- Pass their classes, earn credits and be promoted;
- Attend school regularly; and
- Graduate and go on to postsecondary education

It is the policy of the Greene County School District that parents of Title I children will be actively involved in the development and review of the Title I Parent Engagement Plan. The district provides coordination, technical assistance, and other necessary support in the planning and implementation of parent engagement activities. The district encourages parent involvement and supports the partnership between home, school, and community by providing information about curricular expectations, student performance, and providing training and materials for parents to help their children. Additionally, the district strives to remove barriers that may prevent parents from participating by offering transportation, childcare, and translation services for Title I academic events.

School Improvement

Procedure for Assisting Schools

The Title I Office works in conjunction with the department of curriculum and instruction and the assistant superintendent of accountability to monitor and provide technical assistance to all Title I schools.

Because GaDOE has aligned the CLIP, District Engagement Plans, and School Improvement Plans, this alignment process ensures that all local teams analyze local data, identify strengths and root causes, set priorities, and develop implementation plans to address those priorities. This alignment empowers districts and schools to effectively address technical support in developing, revising, implementing and coordinating target assistance, school-wide and school improvement plans.

School Improvement Plan

Schools participating in GADOE sponsored Summer Leadership training will begin reviewing their School Improvement Plans during the training. Other schools will begin the development process upon return to work for the new school year. The revision process will be on-going through September. The Title I Director will communicate a deadline for all School Improvement Plans to be submitted to the District office.

The Title I Director will review each plan to ensure that the 18 schoolwide components have been infused into the plan. Title I is an ongoing strategy for improving student academic achievement in the district. In addition, Title I allocations are to be discussed in the components of the plan. Feedback is provided to each principal on any changes or additions needed to the plan.

Principals are responsible for in-building implementation and coordination of identified goals area and activities as outlined in the school improvement plan.

Professional Development Procedures

Greene County schools receive multifaceted professional development and technical assistance. Title I and Title II follows the standards set forth by Georgia Standards for Professional Learning:

GEORGIA STANDARDS FOR PROFESSIONAL LEARNING

Adopted from National Staff Development Council's "Standards for Staff Development"

A. CONTEXT STANDARDS

Professional Learning Communities (PLC's): Professional Learning that improves the learning of all students, and organizes adults into learning communities whose goals are aligned with those of the school and district.

Leadership: Professional learning that improves the learning of all students requires skillful school and district leaders who guide continuous instructional improvement.

Resources: Professional learning that improves the learning of all students requires resources to support adult learning and collaboration.

B. PROCESS STANDARDS

Data-Driven: Professional learning that improves the learning of all students uses disaggregated student data to determine adult learning priorities, monitor progress, and help sustain continuous improvement.

Evaluation: Professional learning that improves the learning of all students uses multiple sources of information to guide improvement and demonstrate its impact.

Research-Based: Professional learning that improves the learning of all students prepares educators to apply research to decision making.

Design: Professional learning that improves the learning of all students uses learning strategies appropriate to the intended goal.

Learning: Professional learning that improves the learning of all students applies knowledge about human learning and change.

Collaboration: Professional learning that improves the learning of all students provides educators with the knowledge and skills to collaborate.

C. CONTENT STANDARDS

Equity: Professional learning that improves the learning of all students prepares educators to understand and appreciate all students, create safe, orderly and supportive learning environments, and hold high expectations for their academic achievement.

Quality Teaching: Professional learning that improves the learning of all students deepens educators' content knowledge, provides them with research-based instructional strategies to assist students in meeting rigorous academic standards, and prepares them to use various types of classroom assessments appropriately.

Family Involvement: Professional learning that improves the learning of all students provides educators with knowledge and skills to involve families and other stakeholders appropriately.

District Level: Principals meet monthly at the district for the Principal's Meeting. The Title I Director makes monthly presentations to principals discussing budgets, compliance, and other areas related to Title I and student achievement. Other federal program coordinators present at Principal's Meetings as needed to discuss budgets, compliance and other areas related to program implementation.

District level staff monitor all schools for Title I compliance and adherence to District required initiatives. The Title I Director directly supports the School Improvement Grant (1003a), monitoring for compliance.

Title I: All Title I staff are trained at the beginning of the year. GaDOE area specialists are invited, as needed, to meet with Title I principals and the parental involvement coordinator to discuss compliance issues and Title I expectations.

Title II: Title II program funds are used to support training for teachers and leaders district wide.

Supporting Schools:

Targeted Assistance and Schoolwide Plans: The Title I Director and other federal programs coordinators works directly with each principal to ensure compliance with schoolwide plans. All plans are reviewed by the Title I Director and the assistant superintendent of accountability. Changes and adjustments are made as needed. Once plans are complete, the Title I director signs off. Plans are reviewed and approved based on the level of

specificity in analyzing school data, determining the root cause of the problems based on the data, and solutions to the problems encountered. **Instructional strategies** are judged based on the research/scientific base behind the strategies being used. **Parental involvement plans** are reviewed to ensure compliance with all federal requirements. Effective professional learning is identified by district staff along with principals. **School Budgets** are submitted to the federal program director/coordinator. Principals must state the research/scientific base behind the expenditure and all budgets must tie directly back to the school improvement plan.

CSI and TSI Schools Support (School Improvement 1003 (a) Fund Recipients):

LEA schools identified as CSI or TSI are provided support and monitoring in compliance with state and federal guidelines, as outlined in the ESSA Flexibility Waiver. Documentation of this support is managed in hard copy format as well as online. The purpose of support is to ensure school improvement.

The LEA provides identified schools with written guidance and technical support in developing, revising, implementing and cording targeted assistance, schoolwide and school improvement plans, as stated above for non-identified schools. The LEA understands the need for intensive school improvement efforts district wide.

Data analysis is key to defining and implementing improvement efforts at CSI and TSI schools.

Annually, the LEA completes and operates in accordance with required MOUs and assurances for federal and state compliance. This requires the technical assistance of the LEA in completing an original Justification of Expenses and budget submission in the GADOE portal. At least three times during the school year, fund expenditures are reviewed by the LEA with principals for alignment with target expenditures percentages and line item allocation. Justification of Expenses and Budget Amendments are generated, as needed during these review intervals. The LEA monitors utilization of funds and services as stated in the justification. Concerns are addressed in meetings with principals throughout the school year. Monitoring processes and procedures is on-going throughout the school year.

School Improvement 1003(a) Funding (ESEA: Sec. 1116(b)(3)(A); Sec. 1116(b)(4)(B))

When developing plans for the use of School Improvement 1003(a) funds, the Title I Director/Assistant Superintendent for Curriculum & Instruction works closely with each identified school to ensure that the use of funds is for:

- Evidence-based strategies that will strengthen the core academic subjects in the school and address the specific academic issues based on data that caused the school to be identified for school improvement. A rationale (Logic model) may not be used with School Improvement 1003(a) funds
- Professional development that is sustained, job-embedded, collaborative, data driven, and focused on student instructional needs.

CSI and TSI schools are directly involved in the planning and development of their SIG 1003(a) budgets based upon identified school needs. School personnel are an integral part of the district's Comprehensive needs assessment and identification processes. Principals approve every budget line entry as recorded on the Justification of Expenses/Purchases funding form. District personnel support them through completion of this document and other budgetary forms required for approval and receipt of grant funds. Regular communication is documented between the LEA and CSI and TSI schools.

School Improvement 1003(a) Budget Development

The following process is followed for development of the School Improvement 1003(a) budget:

- Information on the school improvement grant is released from the GaDOE
- Meetings (electronically, via telephone, and/or in person) are held with the Assistant Superintendent of Curriculum & Instruction/Title I Director, school principals and their leadership teams, the DOE School

Effectiveness Specialist, and the RESA support personnel.

- Schools review their data and prepare the budget and Justifications of Expenses
- Schools share their proposal with school staff
- Budgets and Justifications of Expenses are reviewed by the Title I director to ensure that expenditures are allowable.
 - The director also reviews the budget and justification to ensure that they align with the school improvement plan.
- Budgets and Justifications of Expenses are revised if needed and technical assistance is provided if applicable
- School Justifications of Expenses are approved by the
 - Principal
 - GaDOE District Effectiveness Specialist
- Budgets and Justifications of Expenses are entered into the Consolidated Application by the Title I Director
- The superintendent approves the budget.

Technical Support and Other Assistance:

Federal program coordinators provide technical support and other assistance as needed to all schools. Special attention is given to CSI and TSI schools to ensure that terms stated in the Memorandum of Understanding (MOU) are met. Additional support is received from other central office staff in conjunction with the regional educational support agency (RESA), area colleges and universities, and state personnel assigned to support CSI and TSI schools.

School Improvement, Corrective Action and State Directed Status

Single Statewide Accountability System

The State Board of Education maintains an approved Single Statewide Accountability System with awards and consequences. This system is described in detail in State Board Rule 160-7-4. This and other Board rules related to Federal Title I, Part A requirements may be reviewed in their current form on the policy page of the Georgia Department of Education's (GaDOE) Web site and on the Web site of the Office of Student Achievement.

Beginning in 2018-2019, Georgia will provide additional support to schools classified as Comprehensive Support and Improvement (CSI); Targeted Support and Improvement (TSI); and Promise Schools. The support will address the need to raise student achievement, close achievement gaps, and promote continual progress toward full proficiency for all of the students in Georgia.

These separate criteria establish categories that provide distinct, purposeful groups of schools and districts identified as needing specific supports and interventions. CSI schools, when ranked according to their three-year CCRPI average, are among the lowest performing schools that represent 5% of all schools eligible for identification; or they have a four-year adjusted cohort graduation rate less than or equal to 67%. TSI schools have at least one subgroup that is performing in the lowest 5% of all schools in at least 50% of CCRPI components. These categorizations will impact both the types of supports and interventions initiated and the students that will be targeted as part of a school's school improvement plan. Under this system, the GaDOE will be able to serve Georgia's overall lowest achieving schools as well as lowest achieving, high needs students in schools that are not traditionally captured in the lowest tier of schools based on all students' achievement. This system ensures that resources are used efficiently and in an organized way that targets appropriate groups of students.

In addition, the GaDOE will work with the district in facilitating support for schools identified as CSI or TSI. Short-term action plans will be developed at each school and will be monitored by a lead school improvement specialist. These lead school improvement specialists will work with identified LEAs, school staff, and the school

improvement specialist assigned to the school in the development of these plans. The lead school improvement specialist is responsible for monitoring the implementation of the short term action plans, serving as a liaison with the school improvement specialists and LEA, and working directly with the school or LEA if implementation is not done with fidelity. The GaDOE will enter into a formal agreement with the LEA outlining the expectations of the LEA, school, and the GaDOE. See Responsibility Table below.

Reward School

The USED accountability system will reward schools based on exceptional performance. Two categories of reward schools will be recognized.

Reward School Definition:

- A **“Highest-Performing School”** is a Title I school among the Title I schools in the State that has the highest absolute performance over a number of years for the “all students” group and for all subgroups based on statewide assessments, and, at the high school level, is also among the Title I schools with the highest graduation rates. A school may not be classified as a highest-performing school if there are significant achievement gaps across subgroups that are not closing in the school.
- A **“High-Progress School”** is a Title I school among the ten percent of Title I schools in the State that are making the most progress in improving the performance of the “all students” group over a number of years on the statewide assessments, and, at the high school level, is also among the Title I schools in the State that are making the most progress in increasing graduation rates. A school may not be classified as a high-progress school if there are significant achievement gaps across subgroups that are not closing in the school.

Because the GaDOE supports the quality implementation of the state standards as the most effective way to address equity for students in Georgia, school improvement efforts will address disparity where performance flags indicate discrepant patterns of performance for different subgroups by focusing on interventions that promote standards for underperforming groups. It is incumbent on the GaDOE to ensure that districts demonstrating patterns of disparity receive support and guidance regarding implementation of the state standards, particularly as it relates to improving the achievement of economically disadvantaged students, English Learners, and students with disabilities and closing existing achievement gaps. In this way, school level performance flag indicators will be taken into account when formulating school improvement plans for CSI Schools and TSI Schools.

The school improvement specialists working with CSI and TSI Schools have specific knowledge and expertise in the use of data analysis, school improvement, implementation and monitoring of school improvement plans, leadership development and instructional best practices. The work of the school improvement specialists is monitored by staff at GaDOE and professional learning for the specialists is on-going.

The GaDOE will also facilitate collaboration with other educational agencies such as Regional Education Service Agencies (RESA), colleges and universities, and regional labs to provide a statewide system of support for all schools.

Becoming A Schoolwide School

Greene County desires all of its schools to be Title I schoolwide rather targeted assistance. The driving reason for this decision is to allow all children and all parents an opportunity to have equal access to all related Title I assistance.

The process to become a schoolwide school and the specific timelines for the schools are listed below.

Process to Become a Schoolwide Program

School and District Consequences

School Responsibility

- Present schoolwide information to parents and staff.
- Assemble a committee of stakeholders to include, but not limited to: principal, teachers, parents, business partners, etc.
- Maintain sign-in sheets, agendas, meeting minutes for each committee meeting
- Assemble committee to write and approve plan
- Post written plan in a language that parents can understand

District Responsibility

- Submit Letter of Intent for Each School
- Write the Schoolwide Plan
- Package the Schoolwide Plan
 - Describe how the school will use resources from other sources to implement the required components.
 - Describe how the school will provide individual student academic assessment in a language the parents can understand.
- Get Local Board of Education Approval
 - When written, the schoolwide plan must be officially approved by the Superintendent or designee.

Continuation Requirements

Maintain documentation related to three core components (comprehensive needs assessment, comprehensive school plan approved by the local Board, annual evaluation of program effectiveness).

Use Title I funds to supplement educational services and not supplant those funds that would, in the absence of Title I funds, be made available from non-Federal sources for the school. Funds that would normally flow to the school from non-Federal sources must continue to be provided to the school.

Conduct an annual evaluation of the implementation of, and results achieved by, the Schoolwide Plan (SWP). This evaluation must determine whether the SWP was effective in increasing the achievement of students in meeting state standards, particularly those students who had been furthest from achieving the standards.

Review and revise the plan as necessary based on the results of the evaluation to ensure the continuous improvement in student achievement.

Make the plan available to LEA, parents, and the general public.

Schoolwide Plan Development Procedure

Creating, Reviewing, and Approving Schoolwide Plans

Schoolwide Improvement Plans are developed each spring for the following school year. Each school leadership team meets during the spring. The team is composed of representatives from grade levels, content areas, and departments, as well as administration and parents. The stakeholders meet to develop a plan. School administrators then present the plan at the annual system leadership summit as they work with other schools, system leaders, community members, and parents to develop a system improvement plan. Once the plan is

approved by system leaders, it is presented to the local board of education for information. 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 periodic administrative 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 conduct progress checks to evaluate the extent to which improvement plan goals are being met. Parents are sent information inviting them to participate in the revision process at annual Title I Planning meetings held at each school during the spring. Once revisions are made, the plan is placed on the system and each school's website. Paper copies are also available in the main office at each school.

Selection of Evidenced-Based Action Steps

Definition

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

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

Implications

During schoolwide planning meetings, school leadership teams identify and record the extent to which the activities, strategies, and/or interventions contained in their school improvement/schoolwide plans meet the various levels of qualifying as being evidence based: strong, moderate, promising, or rationale if sufficient research can be located to substantiate the use of the program or strategy to impact instruction. If sufficient research cannot be located, a logic model will be developed that includes a rationale for using the program or strategy and what evidence will be collected to determine impact of the program or strategy. This information will be documented in each school improvement plan.

Resolution for Unapproved Schoolwide Plans

Schoolwide improvement plans are maintained in a shared space. This provides access to all stakeholders and allows for opportunities to collaborate. If the plan is in need of revision, comments are placed on the plan. Once all comments have been resolved satisfactorily, the following positions will add their name and a date of approval for each schoolwide improvement plan: Principal, Professional Learning Coordinator, Title I Director, Assistant Superintendent of Accountability, and the Superintendent.

Written Procedure for Identifying and Serving Eligible TA Students

In all schools (public or participating private schools) selected to receive Title I, Part A funds that are ineligible for a schoolwide program or that choose not to operate such a schoolwide program, a local educational agency serving such school may use funds received under this part only for programs that provide services to eligible children identified as having the greatest need for special assistance. The following are adhered to in the district's targeted assistance plan:

- Restrict Title I, Part A resources to help eligible, participating meet the Georgia Standards (STATE STANDARDS) standards that are expected of all students.
- Ensure that planning for students served under this part is incorporated into existing school planning

- Use effective methods and instructional strategies that are based on scientifically based research that:
- strengthen the core academic component of the school
- give primary consideration to providing or increasing extended learning time, such as an extended school year, before-and after-school, and summer programs and opportunities

Eligible children are identified by the school as failing, or most at-risk of failing, to meet the GaDOE's challenging student academic achievement standards on the basis of multiple, educationally related, objective criteria established by the district and supplemented by the school. Selection is based on the scores of more than one test (see descriptions of tests in next section). The program has an academic component. Targeted assistance schools (public or participating private schools) are required to separately identify Title I students. These schools must meet similar requirements of schoolwide programs, such as emphasizing accelerated curricula, scheduling extended learning time, using effective methods and instructional strategies that are scientifically research based, providing adequate professional development, and coordinating the Title I activities with other school reform activities. Students must be ranked using a multiple criteria selection process.

Description of the Method by Which Children with the Greatest Needs are Selected:

- 1st -2nd grade students will be selected through multiple selection criteria. The Title I teachers will create a list of students deemed "at risk", based upon their ranking in the following: classroom performance, MILESTONES EOG test scores, Fountas & Pinnell Running Records, PASS, IKAN & Gloss, STAR math, Math CFA's, and Teacher recommendation. Note that preschool through second grade students must be chosen solely on the basis of the judgment of the teacher, interviews with parents and other developmentally appropriate measures examined by the teacher.
- 3rd-5th grade students will be selected through multiple selection criteria. The Title I teachers will create a list of students deemed "at risk", based upon their ranking in the following: classroom performance, MILESTONES EOG test scores, NWEA, and Teacher recommendation.
- Children attending public or participating private schools who are economically disadvantaged, children with disabilities, migrant children, homeless children, or limited English proficient children, are eligible for services under this part on the same basis as other children selected to receive services under this part. In general, the following children are eligible for services:
 - A child, who at any time in the two years preceding the year for which the determination is made, participated in a Head Start, Even Start, or Early Reading First program, or in preschool services under Title I.
 - A child, who at any given time in the two years preceding the year for which the determination is made, received services under Title I, Part C, Education of Migratory Children.
 - A Child in a local institution for neglected or delinquent children and youth or attending a community day program for such children.
 - A child who is homeless and attending any school served by the local educational agency.

The district makes a concerted effort to minimize removal of students from regular classrooms during the day. The needs of each individual student are considered.

Teacher schedules, class rosters, rankings, are turned into the Title I office at the beginning of the school year and as revisions are made.

Procedure for Enrolling New Targeted Assistance Students

Placement for New Students in Targeted Assistance Programs

A new student coming into the school after the school year has begun will be evaluated for placement as follows:

- Records for prior Title I services will be reviewed by homeroom teacher and referral to Title I teacher for possible Title I services will be made.
- If no prior Title I services are noted and the student's records indicate that the student qualifies for Title I consideration, the regular Targeted Assistance ranking instrument will be used.
 - Upon identifying the student's need, homeroom teacher will complete a teacher recommendation checklist
 - Data will be collected as listed on the ranking instrument. The scoring rubric will determine the student's placement for targeted Title I services.
 - If student comes from out of state or a private school where no MILESTONES EOG data is available, other assessment instruments as listed on the ranking instrument will be used
 - Once ranking is completed, the student will be picked up for services as space is available and need is documented.
 - If a student cannot be served immediately, then their name will be placed on a waiting list and the student will rotate into services as space is available.
 - If the ranking instrument determines there is no need for immediate placement for Title I services, the student will be monitored by the homeroom teacher and assessment data will be periodically re-evaluated.

Scheduling Models

A Title I school may use one or a combination of several instructional delivery models. Greene County schools use the push-in and pull-out models widely based on the needs of each individual student.

In-Class Model (Push-in)

An "in-class" delivery model is a Title I project in which the instructional services are provided to participating students in the same classroom setting and at the same time they would receive instructional services if they were not participating in the Title I project. The classroom teacher who is responsible for providing instruction to participating students in the absence of Title I continues to provide instruction under Title I. This includes planning the instructional program, providing instructional services and evaluating progress. Title I staff work closely with the classroom teacher to provide services which are supplemental and particularly designed to meet participants' special educational needs.

Pull-out Model

In a Title I pull-out delivery model, students are pulled from their regular classroom to receive instruction in a Title I Reading or Math program. Students should not be out of their regular classroom's reading or math instructional time for more than 25% of that time. For example, in the classroom instructional time is 60 minutes; students cannot miss more than 15 minutes of that time. They may receive as much time in the Title I lab as identified for their grade level in the Educational Plan for Student Success (EPSS). Title I staff work closely with the regular classroom teacher to provide services which are particularly designed to meet participants' special educational needs.

Replacement/Excess Cost/Extended Pull-out Model

The model pairs a Title I teacher with a classroom teacher. The usual class load, which in this case is composed of all Title I participants, is shared by the two teachers.

Elective Model

Some middle schools use an elective course to supplement students' basic reading and math instruction.

Add-on Model

An "add-on" delivery means Title I services are at times when participants would not otherwise be receiving state and locally funded instructional services. This may include periods such as vacations, weekends, before or after

regular school hours, or during non-instructional time during the regular school day. When Title I is given as an elective at the secondary level, it is considered an add-on project.

Pre-Kindergarten Programs

The district does not reserve funds for pre-kindergarten programs at this time. Policies and procedures will be put in place if the district determines that this is a Title I need in the future.

The LEA does provide scientifically-based preschool information for parents on the District Website. This information is updated annually and serves as a means for connecting parents with information their children will need to know before entering kindergarten.

School Improvement 1003 (g) (SIG)

Procedures for Determining that Planned Activities Meet the Goals of the Plan

Greene County Schools has a multi-tier process for developing, revising, implementing and coordinating school improvement plans. Professional development is provided at the school level, district level, and from GaDOE. Central office has a Director of District Effectiveness position that coordinates staff development. There are instructional coaches in every school. In addition, the district uses Northeast Georgia RESA to provide training for staff.

Staff will start by determining goals that are based on the data analysis and student need. Georgia Professional Learning Standards are used as well with this process.

Planned activities will meet individual student goals as well as district goals, using state standards as a framework for meeting these goals and the Georgia Professional Learning Standards as guidance.

School Improvement 1003 (g) procedures will align with School Improvement 1003 (a) procedures as outlined in Unit IV, unless otherwise indicated by the Georgia Department of Education.

Fiduciary Responsibility

Maintenance of Effort Procedures

Documentation for MOE is only required for districts that do not meet the required 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. The calculation in the GaDOE portal determines which funds should be excluded from the calculation. Documentation for MOE is only required for districts that do not meet the required maintenance of effort. The Title I Director will pull the MOE information from the Consolidated Application each school year for documentation purposes. MOE information will be shared with other federal program coordinators/directors as needed.

Comparability (Sec.1118(3)(A))

All schools in the Greene County School System (GCSS), except Lake Oconee Academy (LOA) are served under Title I, Part A.

The GCSS may only receive federal funds under Title I, Part A if the district is using state and local funds to provide services that, taken as a whole, are substantially comparable in each school.

Demonstrating comparability is a prerequisite for receiving Title I, Part A funds and must be completed annually.

Comparability ensures that the federal investment has an impact on the at-risk students the program is designed to serve. At the school building level, comparability requires the district to ensure that each Title I school receives its fair share of resources from state and local funds. GCSS may not discriminate against its schools when distributing resources funded from state and local sources simply because these schools receive federal funds.

Comparability must be met or the system must return the requisite amount of non-federal funds to compensate for the number of instructional staff missing to meet compliance with comparability.

Comparability Criteria and Methods

GCSS may determine comparability of each of its Title I schools on a districtwide basis or a grade-span basis. The comparability requirement does not apply to a district that has only one school at each grade span. Grade spans should reflect the district's organization of elementary, middle and high school levels. The grade spans should match the grade spans reported in the GaDOE Consolidated Application.

The GaDOE has established the student/instructional staff ratio as the method for districts to use to determine comparability. The number of students in a school is defined as the total enrollment in the school minus the pre-kindergarten enrollment in the school.

For districts with Title I and non-Title I schools:

- When using student/instructional staff ratios to compare the average number of students per instructional staff in each Title I school with the average number of students per instructional staff in non-Title I schools, a district may consider a Title I school comparable if its average does not exceed 110-percent of the average of non-Title I schools.

For districts with all Title I schools

- The district may compute the average student/instructional staff ratio for all its schools and consider a school comparable if the student/instructional staff ratio falls within 90 to 110-percent of the average for all schools.
- If all schools are not comparable using the method above, the district may break the schools down by grade span to determine comparability. If the student/instructional staff ratio for each school in the grade span falls within 90 to 110-percent of the average for all schools within the grade span, the schools would be considered comparable.
- A district is also permitted to compare large Title I schools and small Title I schools within a particular grade span. In general, schools may be split into groups if the largest school has an enrollment that is two times the enrollment of the smallest school.
- Additionally, a district may divide its schools by poverty rate and compare the student/instructional ratio of its high-poverty Title I schools to the average ratio of all the high-poverty schools and the student/instructional staff ratio of each low-poverty school to the average ratio of all the low-poverty schools. A district may use up to 50-percent of the schools or attendance areas in the group having low concentrations of children from low-income families to generate the low-poverty average that will be used for comparison with the high-poverty schools. A school is considered high poverty if it has a FRM percentage greater than or equal to 60-percent. Title I provides that a district need not include unpredictable changes in student

enrollment or personnel assignments that occur after the beginning of a school year in determining comparability of services.

Comparability Report Procedures

1. Request CPI Report 12 and 13 (certified staff and non-certified staff) from Finance after the report has been submitted to GaDOE (usually in October). This is your source documentation and must be used for this report. This report is found on the Con Ap. Export the names of all staff and set-up spreadsheet to count all staff members at each individual school. Obtain Payroll report from Finance Department for September and verify teachers coded to Federal vs State/Local Fund.
2. Pull Oct FTE count from GaDOE website.
3. Pull nutrition Oct count from GaDOE website
4. Once the report is received, strike out or highlight everyone that is not 00.
5. Count all staff not highlighted (e.g.: Title I Regular, etc.)
6. Count these numbers up. Make sure to have an additional person double check these numbers.
7. Be careful to examine the staff that are split-funded
8. Go to GaDOE and pull up the latest forms for comparing Title I and Non-Title I schools.
9. Pull the Oct FTE report to fill out the signature page for the report.
10. Do not count pre-K
11. Submit for superintendent's signature
12. Submit to GaDOE area specialist electronically and place hard copy in mail to GaDOE as well.

Resource Allocation and Management Plan (RAMP)

The Greene County School System currently has one elementary school, one middle school, one high school, one K-12 school, an alternative education program and a Pre-K program.

The state provides funds through a funding formula called the Quality Basic Education (QBE) Formula. The stated purpose of the QBE formula is to provide “an equitable public education finance structure which ensures that every student has an opportunity for a quality basic education.” (GA. CODE § 20-2-131). The crucial problem in Georgia is that the estimated cost of the basic program, as defined by the QBE Formula, is far short of what a local system would have to spend to comply with the minimum state requirements; therefore, the school district also levies additional property taxes to help support the district's educational programs.

The district's budget process begins in January of the previous year. State and local revenues are estimated based on student enrollment, teaching staff and local property tax assumptions. Once the school system estimates state and local funding, staff allocation to the individual schools is a critical budget process. Staff salaries and benefits account for approximately 81% of the total general fund budget. In addition to staying within financial limits, the district must also ensure that state and local funds are adequately and equitably allocated to all schools in the district.

The allocation model below provides general staffing guidelines and principles as a starting point for assigning human capital and funding. School leaders are given reasonable flexibility to make specific assignments which best serve the needs of students and maximize the strengths of instructional and support staff. The model below shows the minimal expectations for staffing. Schools can request consideration for adjustments in their allocation based upon changing and justifiable needs.

All school staffing categories are dependent upon available funding and sustained student enrollment.

General Staff Allotment Formula Information

- Allocations are based on full time enrollment.

- Art, music, physical education and connection classes for elementary and middle schools are funded through a combination of State (QBE) funds and local funds.
- Initial personnel allotments are based on adjusted projected enrollments and a local board-approved teacher-student ratio.
- Enrollment must be maintained throughout one fiscal year in order to receive additional staff for the following fiscal year.
- Lake Oconee Academy is a startup Charter School that is funded by the Greene County School District. LOA's funding is determined on a yearly basis through a funding formula provided by the Georgia Department of Education that aligns with the approved Charter agreement. This funding formula is mostly based on LOA's enrollment numbers. Copies of LOA's funding worksheet are kept on file at the Greene County Board of Education central office and are available upon request. The numbers included in this plan are exclusive of funding provided to LOA.

Allowability Procedures & Budget Procedures

Overview

At the beginning of the year, principals are provided professional learning on federal program procedures including: writing school wide plans; developing a budget; what expenses are allowable; and supplement not supplant. In addition to the formal training, the federal program director continually communicates with principals regarding their budgets. The principals and director communicate via email, telephone calls, and onsite visits as needed to answer any questions about the budget process and allowable expenditures. The federal program director emphasizes to principals that all budget items must be included in the school wide plan and in the CLIP.

All federal program expenditures (Title I, II, and others) are to be:

1. Allowable under applicable laws and regulations
2. Necessary, reasonable, and allocable
3. Supported by source documentation
4. Supplemental to non-federal funds and
5. In alignment with the approved budget
6. For goods and services within the Period of Performance
7. In alignment with Procurement and Financial Management standards.

Budgets

Budget status sheets are run by the Chief Financial Officer every other month. These are used to monitor expenditures and verify that the appropriate personnel are coded and paid from appropriate federal program budgets.

As appropriate and after a meeting held with principals to discuss budgeting and other program requirements, each school receiving federal funds prepares a school budget based on the allocation distributed. School federal funds budgets are developed at the school level after the allocation is provided. Other federal budgets are prepared based on their state/federal guidelines, to include support for CSI and TSI schools. Budgets are developed around the needs of the school as determined through data analysis at each school. Schools are given a date in the fall of each year to complete and submit the budget. They are provided guidance through meetings, phone calls, and e-mails. The structure for completing the budgeting process is made clear at the initial budget meeting with principals. The schools submit the budgets, which are then reviewed for allowable costs, which are reasonable and necessary to carry out the Title I school wide program and address compliance with other federal programs. Once necessary revisions have been made at the school level, the set asides and school budgets are compiled and placed in the consolidated application. The timeline for submission is in early fall. Schools may not requisition items until they have been notified that the budget(s) has been approved at the state level. Once approval of the application has been made, schools are notified to spend Title budgets and are provided a due date

to complete purchases (exceptions typically include expenditures for parent involvement and professional learning).

Allowability Procedures and Internal Controls

The purpose of federal funds is to enable schools to provide opportunities for at-risk and disadvantaged children to acquire the knowledge and skills contained in the challenging state content standards and to meet the challenging state performance standards developed for all children. Per federal and state guidelines, Greene County Schools have flexibility and opportunities to use Title I, II, and other funds. In school wide programs, an LEA may use Title I funds for any activities that are part of the school wide program plan. Greene County Schools does not currently have any targeted assistance schools. Title II funds are to be used for improving student achievement by improving teacher and leader quality. Expenditures should be for this purpose.

Greene County School System determines the allowability of expenditures in accordance with 2 CFR 200.403, 2 CFR 200.404, and 2 CFR 200.405. Greene County School System determines period of performance in accordance with 2 CFR 76.707, 2 CFR 200.77, and 2 CFR 200.309. In order to ensure that the district adheres to the guidelines expressed in 2CFR 200, the district uses the procedures below:

- The federal programs director provides guidance to principals regarding what is considered a necessary, reasonable, and allowable expense.
- Principals are reminded that their school wide plans must drive their budgets.
- Principals are reminded that the period of performance is July 1 of the current fiscal year through September 30 of the following year (15-month period). Only allowable costs incurred during the period of performance may be charged by the LEA to the Federal fund award (includes Title II, Part A). Principals are encouraged to plan for and expend funds early in the grant cycle.
- Principals, with their leadership teams, analyze data and conduct needs assessments of their schools.
- The data that they collect are included in both the schools' school wide plans and the district's CLIP. The CLIP and the school wide plans are submitted to the Title I director. The Title I director and Title II Coordinator review the plans; provide feedback to the principals (including needed revisions); and submit the completed plans to the department of education. Copies of school wide plans are shared with other federal program coordinators.
- After having approved plans, principals begin developing their federal program budgets.
- The federal program director/coordinator reviews the budgets to ensure that all budgeted items were also included in the CLIP and school wide plans and that the items meet federal guidelines.

Title I Unallowable Expenditures

The following are examples of unallowable expenditures and CANNOT be included in the Title I school budget. The district Title I director will contact the school principal and disallow the unallowable items. If the director has questions about allowable or unallowable expenditures, he/she will refer to the state Title I handbook. If the director continues to have questions after referencing the state handbook, then he/she will contact the district's area specialist.

- School resource officer, security guard (exceptions may be allowable for specific Title I events conducted outside normal school hours)
- Clinic aide, school nurse, clinic supplies
- Custodian, custodial supplies (exceptions may be allowable for specific Title I events conducted outside normal school hours)
- Cafeteria worker, cafeteria supplies
- ELL coordinators, ELL required forms and tests
- Behavioral intervention positions
- Incentives, rewards, certificates, door prizes, raffle items, etc.

- Marketing items such as brochures, banners, and flags (unless Title I Reward Schools, National Title I Distinguished Schools or Reward District)
- Memberships for professional organizations not related to Title I
- Field trips (all field trips must receive prior approval from the Department)
- Food items (unless light snacks purchased for parent trainings)
- Guidance counselors, unless the position is beyond District allocation, are allowable if 100-percent of their time is spent working on Title I related guidance/academic issues

Title II Allowable and Unallowable Expenditures

Allowable Expenditures

Greene County Schools will adhere to expenditure guidelines for current Title II, Part A Program components.

Prorated Expenditures

Expenditures that are not fully Title II, Part A allowable and/ or do not fully align with the district's prioritized needs will be appropriately prorated. Commonly this applies to:

- Software;
- Salaries in which duties and responsibilities extend beyond the scope of what is allowable;
- Shared equipment/inventory;
- Contracted services that include unallowable administrative fees or activities and/ or deliverables that extend beyond the scope of the Title II, Part A grant program; and
- Conferences and/ or workshops where content extends beyond what is allowable and aligns with prioritized needs (includes associated travel or material expenses).

In instances where expenditures must be prorated, the district will maintain documentation of how the proration was determined. If included in a budget, the proration (salary, software, equipment, etc.) will be indicated in some format in the budget descriptor.

In the event that an accounting error occurs and it is found that costs have not been prorated, the expenditure will be reclassified through accounting and documentation of the reclassification to another funding source will be maintained.

Unallowable Expenditures

- Expenditures unrelated to prioritized needs
- Curriculum and assessment development work sessions

Academic Achievement Awards Program

- Schools eligible to receive the Academic Achievement Award will be notified after notification from GaDOE.
- Title I district office will send out allocation letters informing schools of the dollar amount they will receive.
- Schools must submit a budget, signed assurances, and a narrative stating how they will use the funds.

- The needs of the school determine how the funds will be spent. Schools are strongly encouraged to examine the specific needs of the school and determine how the monetary award will directly impact student academic achievement.
- Once budgets have been approved by the GaDOE and Title I Director, orders will be placed.

Compliance Timeline

Activity	Date
The district should collect the necessary data to demonstrate comparability as of the October full-time equivalent (FTE) count day. Request this information from FTE Coordinator around the 1st week in November. It is the October count.	1 st Week in November
Title I Comparability Report form must be submitted annually to GaDOE no later than November 15 th .	November 15th
If all schools in the district are not comparable as of the October FTE, revise report	No later than Dec 31 st of the current year

Who to Include in Staff Count:

Teachers

Other personnel that provide direct instructional services including music, art, and physical education teachers, guidance counselors, speech therapists, media specialists, staff that provide support instruction such as school social workers and psychologists.

Who Not to Include:

Custodians, cafeteria personnel, school nurses, security personnel, pre-kindergarten teachers, prekindergarten paraprofessionals, secretaries, cafeteria and custodial workers and non-instructional paraprofessionals

Cost Principles: Reasonable, Necessary, Allocable, and Allowable

Purpose

A local education agency (LEA) may use federal funds only for programs and projects designed to meet the special educational needs of educationally deprived children. Beginning July 1, 1999, federal equipment is defined as an article of nonexpendable, tangible personal property having a useful life of more than one year and an acquisition cost of \$5000 or more. Any equipment purchased with federal funds must be reasonable and necessary to implement a properly designed project for eligible children.

The guidance and procedures in this document should be followed to ensure that the limited use of federally funded equipment in non-federal grant approved activities does not interfere with the federal program and is consistent with federal statute and regulations. This guidance is taken from the Edgar law, 34 CFR 80 -- *Uniform Administrative Requirements for Grants and Cooperative Agreements to State and Local Governments*, and 34 CFR 87 -- *Cost Principles for State, Local, and Indian Tribal Governments*.

Use of Title I Equipment in Schoolwide Schools

In the past, federal Title I law and regulations generally required funds to be used for programs benefiting identified Title I eligible children. Equipment purchased with Title I funds had to be used primarily (minimum of

90 percent of time used) with identified Title I students. Also, Title I equipment had to support supplementary services rather than services already provided by the state or LEA. These restrictions still apply in targeted assistance schools, but they are waived in schoolwide program schools, because children are not separately identified as eligible in such schools.

The intent of schoolwide programs is still to assist disadvantaged children, but this goal is achieved by upgrading the entire educational environment. Title I funds and equipment purchased with these funds are used to improve the entire school program. As long as the intent and purpose of the schoolwide programs are addressed, all the students in a schoolwide program school may use equipment purchased with Title I funds.

Use of Title I Equipment in Targeted Assistance Schools

Targeted Assistance Schools Equipment Usage

The Greene County School System does not have any Title I, Part A targeted assistance programs, but if targeted assistance programs are ever added, they will follow the same inventory procedures as school-wide programs in the district. All equipment purchases (i.e. computers, printers) by participating TA schools are to be used only by Title I teachers and eligible Title I students. A list of the Title I students must be available to ensure that the equipment is only used by these students. The district Title I department reserves the right to monitor equipment purchased with Title I funds after the school becomes a non-participating Title I school.

Use of Title I Equipment with Compensation

School systems have some options to increase flexibility in the use of Title I equipment in Targeted Assistance Program schools in non-Title I activities. The LEA may either assess a user fee or share costs through joint purchases. When a LEA purchases equipment with Part A funds, for example, it may share the cost with other Federal, State, or local programs that will also make use of the equipment on a proportional basis. When the LEA use of Title I equipment exceeds the time permitted for non-Title I use without compensation, a fee should be assessed. Care must be taken when determining a reasonable and fair assessment. The supplement not supplant provision of the regulations must be considered. This affects programmatic use of the equipment in that whatever is provided with state and local funds for children who do not participate in Title I must also be available to children who do participate in the Title I program. Then Title I can provide as much supplemental effort as is needed. Additionally, a LEA may take into consideration, when it decides its equipment needs under Part A, whether other equipment--i.e., LEA-funded adult education equipment used at night--would be available for Part A use during the day.

Equipment Usage: Questions and Answers

The following guidance is intended to assist LEAs as they determine appropriate, fair and reasonable fees for use of Title I equipment for non-Title I purposes.

Question 1. May equipment be purchased with Title I, Part A funds?

Yes. A LEA, however, must determine that (1) the equipment is reasonable and necessary to effectively operate its Part A programs; (2) existing equipment will not be sufficient; and (3) the costs are reasonable.

Question 2. May Part A funds be used to pay the interest on lease purchase agreements for the purchase of Title I equipment?

Financing costs (including interest) for Title I.A. associated with otherwise allowable costs of equipment is allowable subject to the following conditions:

- (1) The financing is provided (from other than tax or user fee sources) by a bona fide third party external to the governmental unit (SEA or LEA).
- (2) The assets are used in support of Federal awards.
- (3) Earnings on debt service reserve funds or interest earned on borrowed funds pending payment of the construction or acquisition costs are used to offset the current period's cost or the capitalized interest, as appropriate.

Question 3. *How do we calculate a fair user fee?*

The user fee is based on the percentage of non-Title I use and on the anticipated life expectancy of the equipment.

Question 4. *How is prorated purchased cost calculated?*

Prorated cost for purchase of equipment is calculated in the same manner as above except the total purchase price is used rather than a fraction based on life expectancy.

Question 5. *What about additions and improvements to existing equipment during subsequent years?*

Any updates would use the same procedures to determine user fees or prorated costs.

Question 6. *What happens to the funds when a user fee is assessed?*

The funds are deposited in the local Title I project account (Fund 402) to be used for expanding and enhancing the Title I services for identified children.

Question 7. *If a user fee is to be applied or if a joint purchase is desired, can in-kind contributions by the LEA be considered to offset the LEA fee?*

Yes. Local expenses for in-kind contributions must be documented, capable of withstanding an audit, and meet the requirements of 34 CFR 80.24--*Uniform Administrative Requirements for Grants and Cooperative Agreements to State and Local Governments*.

Question 8. *Who owns the equipment purchased with Title I funds?*

Title to equipment acquired under a grant will vest, upon acquisition, in the grantee.

Question 9. *When can equipment be removed from a Title I program?*

Equipment purchased with Title I funds must be reasonable and necessary to effectively operate the program. When the equipment is not needed in the program for the reason for which it was purchased, not needed elsewhere in the program, or for other similar, federally funded programs, then removal of the equipment from a Title I program should follow procedures outlined in the *Financial Management for Georgia Local Units of Administration* handbook and 34 CFR 80.32.

Question 10. *What records must be kept?*

When Title I equipment is used, adequate records must be maintained to justify and document the use by all programs. The records should stand the test of any audits.

Question 11. *How do we dispose of Title I equipment?*

Federal regulations and the *Financial Management for Georgia Local Units of Administration* handbook provide clear guidance. The equipment must not be needed in any Title I activity, must not be needed in any other federal

program and must not be needed for the purpose for which it was purchased. If these conditions are met, the accounting handbook gives direction. Of course, it would not be appropriate to purchase similar equipment in subsequent years. (See Depreciation of Title I Equipment form.)

Question 12. *When a LEA recovers funds from the sale of equipment purchased with Part A funds, may these funds be retained by the LEA or school?*

A State's procedures govern the disposition of Part A equipment. A LEA may retain, sell, or otherwise dispose of equipment with a current per unit fair-market value of less than \$1,000 with no further obligation to the Federal government. If the equipment has a per unit value of more than \$1,000, the LEA must compensate the Georgia Department of Education.

Question 13. *What happens to equipment purchased with Part A funds when it is no longer needed for Part A activities?*

A LEA must dispose of unneeded Part A equipment in accordance with State law and procedures. When equipment is no longer needed for its original purpose, it may be used for activities currently or previously funded by other Federal programs. A LEA could also use the equipment for activities funded from non-Federal sources.

Question 14. *Is it allowable for non-LEA controlled organizations (e.g. Boys Clubs, Housing Authority, etc.) to use Title I purchased equipment?*

Care must be exercised that the equipment is properly supervised, not compromised, and that the groups assume responsibility for any damage.

Question 15. *May a LEA use Title I software for non-Title I activities?*

If usage is subject to a user fee, then the user fee must be applied. One must remember that Title I expenditures for software must be reasonable and necessary to implement the Title I program and, unless in a schoolwide program, not intended to benefit the system or school as a whole.

Question 16. *Can we purchase a local license from local funds and use the Title I software?*

This is an allowable expense provided appropriate user fees are established based on the cost of the equipment and all annual updates.

Question 17. *May staff development be provided for non-Title I teachers in the use of Title I equipment?*

Staff development should be provided to protect the integrity of the equipment. It is an allowable expense if the non-Title I teachers are working with Title I students. However, if these teachers do not work with Title I students, the staff development must be done at local expense.

Question 18. *Can the ten percent use of Title I equipment (in Targeted Assistance Programs) apply to the total number of non-Title I students being served? For example, if there are 28 students being served each period for five or six periods a day, could there be two or three non-Title I students in each class provided that is no more than ten percent of the total class load?*

No. The ten percent applies to time only. If Title I purchased more equipment than could be used by the number of students being served per period in Title I program, this would be a case of excessive expenditure for equipment above what is needed and could result in an audit exception of appropriate expenditures.

Question 19. *What happens to the equipment in a schoolwide project if the school ceases to be school-wide?*

If the equipment is still needed for the purpose for which it was purchased, then it would remain in the school.

Question 20. What happens to equipment purchased for a home for neglected or delinquent children?

The title to all equipment rests with the LEA. If a home closed, then the equipment is returned to the LEA that purchased the equipment.

Supplement not Supplant

All principals receiving federal funds are made aware of the supplement not supplant issue during the training that takes place during the summer month before school starts. Principals review all requests for all federally funded budgetary requests. The Assistant Superintendent/Title I Director and other federal program coordinators review budget requests to ensure that supplanting is not taking place.

Title I and other federal programs uses the follow questions to ensure that programs are supplementing, not supplanting:

- Ensure that all principals and federally funded staff understands the difference between supplementing and supplanting.
- Determine what would have happened in the absence of federal funds.
- Respond “NO” to the following questions:
 1. Would other monies from the state, local or other federal resources have been used to pay for the item or service?
 2. Was the item or services provided with non-federal funds in the previous year?
 3. Was the item or services provided to participating children with Title I funds (Title I schools) and to non-participating children (non-Title I schools) with non-federal funds.

Internal Controls

Accounting Protocols for Federal Programs

Purchases, Authorization of Expenditures, and Segregation of Duties

1. Principal/Instructional Lead Teacher/Parent Involvement Coordinator initiates electronic Requisition Form, complete with:
 - Complete vendor information including phone number and fax number
 - Ship to Information including address for School
 - “Funding Source:” Account number must be specified to distinguish between specific federal program funds
 - Name of person requesting the purchase
2. School routes the completed Requisition to the appropriate federal programs director/coordinator who reviews and verifies the information is included in the Consolidated Application budget page for the school. The program director will then check the Funding Source and approve the Requisition by signing and dating the form.
3. Information is then given to the Superintendent or a designee for review, approval, and signature.
4. Accounts payable secretary/clerk purchases the item and enters information into the database. Purchase Order is sent to the vendor and the requisition copies are filed.

5. When the material is delivered to the school, the bookkeeper:
 - secures the materials in a timely fashion
 - checks off the items received
 - notifies the federal program office the material has arrived and use the ‘received stamp’
6. At the end of each month, the district accountant completes the bank reconciliation process ensuring that records accurately reflect purchases. The chief financial officer signs off on bank reconciliation.

Professional Learning Stipends

- A request for payment is initiated by the administrator and requests payment of stipends for pre-approved professional learning.
- Information is then given to the federal program director for review, approval and signature.
- Federal program Coordinator reviews and verifies the information is included in the Consolidated Application budget page for the school then codes to the proper Federal Program
- District personnel responsible for payroll enter information into the database.
- The stipends will be included in the end of month paycheck.

Stipends (GA 160-3-3-.04)

Stipends will be paid to certified personnel and paraprofessionals for having successfully completed previously approved learning opportunities that have occurred at any time during the fiscal year outside of the employee’s normal contract/work hours at the rate of \$125 per day. The Greene County School System does not pay stipends for work on an award for performance. Any stipends awarded must be reasonable and necessary to the federal program.

Stipends will only be awarded if the following conditions exist:

- There is evidence that the knowledge, skills, practices, and dispositions gained from the professional learning activity are aligned to an approved individual plan, or a school or LEA initiative and/or product, and/or specific goals; and
- The professional learning session is job embedded. The professional learning delivery model is considered job embedded if the following exist:
 - It is relevant to the individual teacher,
 - Feedback is built into the process, and
 - It facilitates the transfer of new skills into practice.
- 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 LEA. The appropriate federal program coordinator will maintain the appropriate paperwork to ensure employees are adequately compensated.

Stipends Payment

1. An assigned building administrator or staff member keeps a time sheet for the activity daily and submits the signed sheet to the Program Coordinator based on the established payroll dates provided by the finance department.
2. The federal program director/coordinator verifies the stipend is included in the Consolidation Application budgets and codes the request to the proper Fund, Function, and Object and sends the request for payment of stipends for pre-approved activities to the payroll department. Time sheet must be attached.
3. Note: all stipends must be pre-approved by specific Federal Program Coordinators/directors.

Purchased Professional Services Payment

1. The federal program director/coordinator reviews the activity to ensure it is suitable for grant payment. The Payee must complete a “Contract for Services” form which is signed by the Superintendent and is maintained in the Accounts Payable Office.
2. The principal (or the principal’s designated school Title I coordinator) sends the request for payment for pre-approved activity to the federal program director/coordinator at the completion of the event. The request should include the payee’s name, title of the activity, date of service, and amount.
3. The federal program director/coordinator reviews documentation and includes the appropriate account number, attaching the request from the principal.
4. Accounts Payable receives the documentation and processes it for payment.

Cash Management – Draw-Down Procedures

The Accountant administers the drawdowns at intervals acceptable to the financial auditors. Where applicable, drawdowns will occur monthly.

Financial services are very careful to draw down these funds based on actual expenditure needs.

The CFO approves the bank statements.

The Accountant/Federal Programs Director/Coordinator performs periodic review of the general ledger. There is no cash involved as all drawdowns are directly deposited.

All reporting documentation is kept in the finance department. It can be reviewed at any time.

The Accountant will provide the Federal Programs Director/Coordinator notification and documentation of drawdown requests (DE0147s). Once the request is approved by the Director/Coordinator, the Accountant will request the drawdown from GDOE. The Federal Programs Coordinator will maintain a copy of drawdown notifications for monitoring purposes. Monthly communications between the parties will document implementation of the procedure. Communications may reveal that no drawdowns are occurring if there were no expenditures in a given month. Otherwise, drawdowns are expected to occur monthly.

Quarterly Reports Procedures

- Initial training is provided by the Georgia Department of Education on the quarterly reports process.
- Year end completion reports are completed and submitted by the Finance Department.

Allocations and Carryover

Procedures for Determining Carryover:

The Federal Programs Director/Coordinator tracks the spending of each program/ school through the year via budget sheets.

The Federal Programs Director/Coordinator provides information to Title I Director as requested about relevant-to-program/school spending.

At the end of the school year, carryover information is updated and reviewed. Parent involvement, and professional development are taken into consideration. Funds are redistributed based on GaDOE criteria. Copy of GaDOE enrollment report is placed in the file.

Federal Programs Physical Inventory Procedures

Entry of information into inventory and management system:

Federal Programs inventory is entered directly into a district database (using Destiny software). The Federal Programs inventory is accessible at both the district and school levels and can be exported from the database into spreadsheet format. The designated district inventory administrator is responsible for verifying receipt of equipment and entering Federal Programs inventory into the database promptly upon receipt. This administrator enters the FAIN number, date of purchase, purchase order, vendor, cost, description, serial number, assigned location, use and condition of each Federal Programs inventory item into the inventory database. The administrator then tags and labels the equipment and arranges for delivery to the designated school site. The condition of equipment is evaluated and recorded each year as part of the annual inventory audit.

Physical Inventory:

Inventory of all equipment and property belonging to any federal program will be identified and inventoried on an annual basis. The federal programs director works with school leaders to set a date for physical inventory visits. Prior to the visits, the district inventory administrator exports an inventory list for each school from the district database in the Destiny software. Each school's Title I Coordinator physically verifies the inventory; both the school Title I coordinator and district Title I director sign the Physical Inventory Monitoring form. The district federal programs director and the inventory administrator makes notes of any discrepancies between the exported inventory lists and the physical inventory. The district federal programs director communicates any discrepancies or needed corrective actions to the school principal and Title I coordinator. All final reports and verifications are maintained at the district level by the district level inventory administrator.

1. A tentative schedule of physical inventory is made using a list of schools receiving federal funds in Greene County.
2. Contact is made by the Federal Programs Director with each school's principal 7-10 days prior to their school's scheduled physical inventory date. Contact is usually made via e-mail to the school's principal. An inventory list (Destiny report provided by Technology Department designee) is attached to the email for principals to review prior to the physical inventory.
3. When the Federal Programs designee/s arrive at the school, designee/s will meet with the contact person assigned by the principal to review what the inventory process will require of them. The contact person will be asked to show the district representatives where the federal programs materials, equipment and real property are located within the school. The contact person is asked to also locate the stamps and stickers for their school that the federal programs office has provided to identify federal programs materials, equipment, real property, etc.
4. The Federal Programs designee/s will use the Destiny inventory report provided by the Technology department of all purchases made by that school with federal funds, with the exception of consumable items, as the tool to locate/identify federal programs materials, equipment, real property, etc. The designees attempt to locate each item on the list and if the item is not labeled "Property of Title I" or "Property of *_specific federal program_*", then a stamp or sticker is used to label the item. If the item is a piece of equipment or real property it should be flagged on the list to be added to the equipment list at the

end of the inventory process. If the equipment has a serial number, then it should be recorded. The location of the item should also be noted.

5. The inventory will most likely be in multiple places within a given school. Once all of the items are located (or not located), a master list is made indicating "located" or "not located" for each item. Also, a comment box is available to provide further explanation about a particular item.
6. From this master list an equipment list is made listing all equipment and/or real property located at each school. This list includes a description of the item, date purchased, vendor name, serial number (if applicable) and location within the school.
7. The equipment list and the master inventory list for each school will be kept on file in the federal programs' office for Greene County Schools.

Equipment records shall be maintained accurately and shall include the following information.

- (i) A description of the equipment.
- (ii) Manufacturer's serial number, model number, Federal stock number, national stock number, or other identification number.
- (iii) Source of the equipment, including the award number.
- (iv) Whether title vests in the recipient or the Federal Government.
- (v) Acquisition date (or date received, if the equipment was furnished by the Federal Government) and cost.
- (vi) Information from which one can calculate the percentage of Federal participation in the cost of the equipment (not applicable to equipment furnished by the Federal Government).
- (vii) Location and condition of the equipment and the date the information was reported.
- (viii) Unit acquisition cost.
- (ix) Ultimate disposition data, including date of disposal and sales price or the method used to determine current fair market value where a recipient compensates the Federal awarding agency for its share.

Greene County Schools Equipment Disposition Procedure

Inventory records are maintained until equipment is disposed of or transferred to another Title I school, federal program, or local program. When the recipient no longer needs the equipment, the equipment may be used for other activities in accordance with the following standards (see Equipment Disposition Form information in Appendix). Recipients of the equipment may retain the equipment for other uses provided that compensation is made to the original Federal awarding agency or its successor. The amount of compensation shall be computed by applying the percentage of Federal participation in the cost of the original project or program to the current fair market value of the equipment. If the recipient has no need for the equipment, the recipient shall request disposition instructions from the Federal awarding agency. The Federal awarding agency shall determine whether the equipment can be used to meet the agency's requirements. If no requirement exists within that agency, the availability of the equipment shall be reported to the General Services Administration by the Federal awarding agency to determine whether a requirement for the equipment exists in other Federal agencies. The Federal awarding agency shall issue instructions to the recipient no later than 120 calendar days after the recipient's request and the following procedures shall govern.

- (1) If so instructed or if disposition instructions are not issued within 120 calendar days after the recipient's request, the recipient shall sell the equipment and reimburse the Federal awarding agency an amount computed by applying to the sales proceeds the percentage of Federal participation in the cost of the original project or program. However, the recipient shall be permitted to deduct and retain from the Federal share \$500 or ten percent of the proceeds, whichever is less, for the recipient's selling and handling expenses.
- (2) If the recipient is instructed to ship the equipment elsewhere, the recipient shall be reimbursed by the Federal Government by an amount which is computed by applying the percentage of the recipient's

participation in the cost of the original project or program to the current fair market value of the equipment, plus any reasonable shipping or interim storage costs incurred.

(3) If the recipient is instructed to otherwise dispose of the equipment, the recipient shall be reimbursed by the Federal awarding agency for such costs incurred in its disposition.

(4) The Federal awarding agency may reserve the right to transfer the title to the Federal Government or to a third party named by the Federal Government when such third party is otherwise eligible under existing statutes. Such transfer shall be subject to the following standards.

(i) The equipment shall be appropriately identified in the award or otherwise made known to the recipient in writing.

(ii) The Federal awarding agency shall issue disposition instructions within 120 calendar days after receipt of a final inventory. The final inventory shall list all equipment acquired with grant funds and federally-owned equipment. If the Federal awarding agency fails to issue disposition instructions within the 120 calendar day period, the recipient shall apply the standards of this section, as appropriate.

(iii) When the Federal awarding agency exercises its right to take title, the equipment shall be subject to the provisions for federally-owned equipment.

Lost Equipment

If the equipment was just misplaced and not stolen, then it's the school's responsibility to replace the equipment. If it was stolen, then we need to report it to the SRO for that school and the Grant Awarding Agency shall be notified.

Technology Equipment Disposal:

When the computer is no longer operational, it will be recycled or disposed of, and an Equipment Disposition Form will be completed. (See Appendix)

The technology department facilitates recycling and disposal of technology that is out of date or no longer operational. At the designated time, the outdated technology is brought to a predetermined location to be recycled. The Technology Department will ensure that all data is removed before a computer is disposed.

Procedures for Complaints

Any complaints issued as a result of federal programming, including Title I, Part A (Disadvantaged Children), Title I, Part C (Migrant Education Program), Title I, Part D (Neglected and Delinquent), Title II, Part A (Teacher and Leader Quality), Title III and English to Speakers of Other Languages (ESOL), Title IV (Student Support and Academic Enrichment), and Title X, Part C (McKinney-Vento Education for Homeless) must be filed according to the system complaint procedures policy. The school system will use the Tracking Form for Resolution of Complaints to ensure that complaints are resolved in a timely manner.

Staff Complaints

All staff will be directed to the district's employee and book an online policy manual for reviewing complaint procedures

Private School Complaints

Complaints by the private school are filed in compliance with the district's complaint procedures.

Parent Complaints and Other Complaints

Parent complaints and other complaints may be made in writing or verbally designated personnel. All complaints will be addressed within 10 days of filing and will be resolved within 60 days. The school system will use the Tracking Form for Resolution of Complaints to ensure that complaints are resolved in a timely manner.

Waste, Fraud, Abuse and Corruption

Greene County Board of Education Fraud Administrative Regulations

- Purpose:** To ensure that the reporting of suspicion of fraudulent activity the Greene County Board of Education ensures employees, clients, and providers of confidential channels to report suspicious activities.
- Definitions:** Fraud: a false representation of a matter of fact, whether by words or 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 from federal grants.

Statement of Administrative Regulations:

Greene County Board of Education thoroughly and expeditiously investigates any reported cases of suspected fraud to determine if disciplinary, financial recovery and/or criminal action should be taken.

Confidentiality: All reports of suspect fraud must be handled under the strictest confidentiality. Only those directly involved in the investigation should be given information. Informants may remain anonymous but should be encouraged to cooperate with the investigators and should provide as much detail and evidence of alleged fraudulent act as possible.

Procedures and Responsibilities

- Anyone suspecting fraud concerning federal programs should report their concerns to Greene County Board of Education at: 101 East Third Street, Greensboro, GA 30642. Concerns may be reported directly to the Superintendent.
- Any employee with Greene County Board of Education (temporary staff, full-time staff and contractors) who receives a report of suspected fraudulent activity must report. This information within the next business day. You are to contact Internal Investigations at the Board Office (Superintendent's Office). Employees have the responsibility to report suspected fraud. All reports can be made in confidence.
- The Greene County Board of Education shall conduct investigations of employees, providers, contractors, or vendors.
- If necessary, you will be contacted for additional information.
- Periodic communication through meetings should emphasize
- the responsibilities and channels to report suspected fraud.

Dissemination Process of Ethics and Fraud Policy:

THE EMPLOYEE HANDBOOK CONTAINS THE ETHICS AND FRAUD, WASTE AND ABUSE ADMINISTRATIVE REGULATION. EMPLOYEES MAY ACCESS THE HANDBOOK ONLINE. SCHOOL LEADERS PRESENT THE INFORMATION TO ALL OF THEIR STAFF IN A FACULTY

MEETING SETTING. EMPLOYEE'S SIGNATURES ON THE MEETING SIGN-IN SHEET INDICATES THEIR REVIEW OF THE ETHICS, FRAUD, WASTE AND ABUSE POLICY. THE SIGNOFF LIST IS OBTAINED AND REVIEWED BY EACH FEDERAL PROGRAM COORDINATOR FOR COMPLIANCE BY FEDERAL PROGRAMS STAFF. EACH SCHOOL LEVEL OR DEPARTMENT SUPERVISOR IS ALSO TO REVIEW THE SIGNOFF LIST TO ENSURE ALL EMPLOYEES HAVE KNOWLEDGE OF THIS POLICY.

Assessment Security

The LEA clearly communicates its requirements for testing security and consequences for violation through its Testing Procedures and Security Plan Handbook.

Procedure for Budget Approval by Local Board

Federal program items needing Local Board approval are including district plans submitted for Board approval (i.e. Professional Learning Plan, Technology Plan, etc.). Federal program line items not approved by the Local Board in a district plan will be submitted for Board approval, as needed.

The approval process for federal budgets is as follows:

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

The federal fiscal year runs from October to September. Federal Budgets and budget amendments will be approved throughout the year. After GaDOE approval, the budgets must then be adopted by the BOE if major changes have been made to the amendments.

Accounting Records

- The district maintains a Chart of Accounts to ensure the correct assignment of account numbers.
- Budget reports and expenditure reports are reviewed by the Federal Programs Coordinator/Accountant quarterly. Adjustments are made as needed.
- Payroll reports are examined quarterly.
- Staff traveling to conferences are required to maintain a copy of the agenda, invoices, etc. related to the conference. Pre-approval forms are also maintained.
- Periodic after the fact certifications are conducted twice yearly: end of December & end of May

Time and Effort

Time and effort records must: 1. Reasonably reflect the total activity for which the employee is compensated 2. Indicate or be supported by documentation that indicates the charges are accurate, allowable, and properly allocated 3. Support the distribution of the employee's salary or wages Performance Targeting specific activities

or cost objectives if the employee works for more than one federal award or a federal award and a non-federal award.

Records must be maintained for all federally funded personnel including substitutes and must be detailed enough to determine allowability. Substitute records will include the core teacher for which a substitute is required, the date(s) involved, and the signature of the individual substituting indicating that what is recorded is factual.

Records will reflect the actual work percentage performed and prorated as needed. Documentation should corroborate percentage worked and proration in accuracy, allowability and properness of allocation. The district will use record keeping instruments aligned with samples provided on the GaDOE website.

Split-Funded Personnel

Split-funded personnel are required to maintain a time log delineating the specific Title I/II and non-Title I/II 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 split time log 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 office of the federal program coordinator.

Stipends

Stipends will be paid to staff once appropriate documentation has been submitted to the federal program coordinator. Appropriate documentation will include but not be limited to: sign-in/attendance verification; documentation of participation in professional learning experience and redelivery of content within the district or submission of reflective practitioner artifacts showing how knowledge gained will be used to benefit teaching and learning in the district. Recipients shall submit a stipend request to the federal program coordinator. District payment/payroll documentation forms will be used to authorize payment of stipends.

Consultants, Contracts, Purchased Services

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

- Contracts are generated by Title I or other federal program directors.
- Specific duties are spelled out for each contract.
- The person must also submit to be fingerprinted (or hold a Georgia Professional Standards Commission-issued certificate) if they are working with students.
- The contract includes the number of hours to work and the rate of pay.
- Tutoring contractors are instructed to submit a billing statement at the end of each month.

Each contract is signed by the following:

- Contractor, federal program director, and superintendent

Verification of Work

The federal program director or designee provides oversight in ensuring that all contractor's work is complete. Artifacts, daily sign in sheets, and completion of all workshops.

The federal program Director signs off on all invoices/ contracts prior to the issuance of payment for services. These contracts are maintained in the Accounts Payable Office.

Procurement (CFR 200.319(c))

Micro-purchases, those less than \$5,000, shall be made with effort to provide the least expense to the District. Purchases shall be based on one or more oral quotations, when possible, to determine best price. Services, supplies or equipment estimated to cost \$5000 to \$10,000 will require three written quotes or website references. Evidence of the quotes must be attached to the purchase order/requisition in the financial software program. All services, supplies or equipment estimated to cost over \$10,000 must use a bid or Request for proposal and will be posted on the District website and the Georgia Procurement website. Evidence of the Bid or RFP must be attached

to the purchase order/requisition in the financial software program. If purchases are made through RESA, compliance with the above procedures are not required.

Competitive proposals or bids twenty-five thousand dollars (\$25,000) or greater shall be approved by the Board of Education. Competitive proposals or bids ten thousand dollars (\$10,000) or greater shall be approved by the Board of Education if the low bid is not recommended. Purchases between \$10,000 and \$25,000 shall be reported to the Board at its next meeting. In compliance with Section 2 CFR 200.319, any purchases in excess of \$150,000 including contract modifications will require a cost or price analysis, sealed bids, and/or competitive proposals. Cost analysis means evaluating the separate cost elements that make up the total price, including profit. Price analysis generally means evaluating the total price.

Sole source bids may be used only when one or more of the following circumstances apply:

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

No purchase or contract shall be divided into parts for the purpose of avoiding the competitive bid process. Each

federal program coordinator and/or department head and/or designee checks Georgia's System for Award Management (SAM) website, <https://www.sam.gov/portal/SAM/##11> prior to approving any purchase equal to or in excess of \$25,000 to ensure the vendor is not on the list of suspension and debarment. The resulting check must be printed, signed, dated, and uploaded to the requisition/purchase order.

Technical Evaluations of Competitive Proposals and Selecting Recipients (CFR 200.320(d)(3))

The Greene County School System shall ensure that the process of procuring goods and services is fair and equitable by taking the following measures:

- Incorporating a clear and accurate description of the technical requirements for the material, product, or service to be procured. The description must not, in competitive procurements, contain features which unduly restrict competition. The description may include a statement of the qualitative nature of the material, product or service to be procured and, when necessary, must set forth those minimum essential characteristics and standards to which it must conform if it is to satisfy its intended use.
- Avoid providing detailed product specifications.
- When it is impractical or uneconomical to make a clear and accurate description of the technical requirements, a "brand name or equivalent" description will be used as a means to define the performance or other salient requirements of procurement. The specific features of the named brand which must be met by offers will be clearly stated.
- Identify all requirements which the offers must fulfill and all other factors to be used in evaluating bids or proposals.
- Ensure that all prequalified lists of persons, firms, or products which are used in acquiring goods and services are current and include enough qualified sources to ensure maximum open and free competition. Also, the school system will not preclude potential bidders from qualifying during the solicitation period.

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

Contracts binding the school district can be made only by the Board or the Superintendent or approved agent.

Conflict of Interest

Standards of Conduct: Employees of the Greene County School System who are engaged in the selection, award and administration of contracts shall abide by the following:

- No employee, officer, or agent may participate in the selection, award, or administration of a contract supported by a federal award if he or she has a real or apparent conflict of interest.
- Definition: such a conflict of interest would arise when the employee, officer, or agent, any member of his or her immediate family, his or her partner, or an organization which employs or is about to employ any of the parties indicated herein, has a financial or other interest in or a tangible personal benefit from a firm considered for a contract.
- 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.
- Officers, employees, and agents of the Greene County School System may neither solicit nor accept gratuities, favors, or anything of monetary value from contractors or parties to subcontracts.
- Violation of these standards will result in reporting of said personnel to the Superintendent of Schools and if appropriate, local authorities. Any misconduct could result in suspension, loss of employment, and any other consequences that are applicable by law.
- Any violation of these procedures must be disclosed in writing, in a timely manner. All violations of federal criminal law involving fraud, bribery, or gratuity violations potentially affecting the federal award must be reported as failure to make disclosures can result in (remedies for noncompliance, including suspension and debarment).

Travel Expenses

Costs incurred by employees and officers for travel, including costs of lodging, other subsistence, and incidental expenses, must be considered reasonable and allowable and must follow the Georgia Statewide Travel policy set by the State Accounting Office as well as the systems written reimbursement policies. In addition, if these costs are charged directly to the Federal award documentation must justify that: Participation of the individual is necessary to the Federal award; and the costs are reasonable and consistent with the district's established travel policy.

All overnight travel is pre-approved by the employee's immediate supervisor.

Travel forms are maintained in the Accounts Payable Office.

The following procedures are intended to ensure that charges are reasonable and consistent.

- Principal approves the requests. All federal program coordinators must pre-approve any applicable federally funded PL before payment will be allowed.
- A travel expense form must be completed in its entirety in order to receive reimbursement for expenses.
- Employees are responsible for ensuring that expenses claimed in the travel expense report are proper, accurate, and incurred for official business. A traveler who knowingly presents a false or fraudulent claim may be subject to penalties under criminal statutes.
- Employee completes and sends the "Travel Expense Statement" to the administrator for approval. The building/facility administrator or his/her designee sends the information to the Federal Program Director/Coordinator for approval and signature. Failure to request reimbursement within 45 days of travel may result in a loss of or reduction of funds.

Periodic Certification

Periodic certifications for all Title I/II/ESSER paid staff takes place after-the-fact. The process takes place twice yearly. The first one for the year takes place December 31th and the second periodic certification takes place at the end of the school year with a report date of June 30th.

Within District Allocation Procedures

General LEA Selection and Allocation Requirements

GCSS Procedures for Reservation of Federal Funds (Set-Asides)

Required Set Asides Reservation of Funds

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

Homeless Children and Youth

The GCSS does not receive direct funding from the McKinney Vento Homeless Program. The district, therefore, follows federal guidelines, setting aside Title I A funds for homeless students. The district reserves a specific percentage (at least one percent) of Title I A funds for homeless children and youth

The Title I director works closely with the homeless liaison, ensuring that the reserved funds will meet the projected needs of homeless students. The system Homeless Liaison trains school personnel to identify children in homeless situations. A home survey is also used to identify homeless students. The system Homeless Liaison is consulted if any staff member suspects that a student qualifies for homeless services. The Liaison then investigates the situation and makes the ultimate determination on whether or not students qualify. When a student does qualify, the appropriate information is sent to the Information Technology Department to be entered into the Student Information System. McKinney Vento funds are used to purchase needed supplies and for tutoring services for identified students on an as needed basis.

Neglected and Delinquent Children

The Greene County School System does not currently have any centers that serve neglected and/or delinquent children. Therefore, no funds are reserved for these purposes. If centers for neglected and/or delinquent children locate in Greene County in the future, funds will be served as directed by the GaDOE in the Title I, Part A allocation letter and worksheet. Additionally, if centers do locate in Greene County in the future, an Annual Survey of Local Institutions for Neglected and Delinquent will be completed based on the number of children residing at the home for 30 consecutive days with at least one day being in October.

Additionally, Regarding Services for Neglected & Delinquent Children

At this time there are not any N&D facilities in Greene County – if this changes the following procedures will be followed:

1. The district will name a person to serve in the capacity of the Neglected and Delinquent Coordinator. This position will fall under Student Services.
2. The coordinator will work directly with delinquent facilities to ensure that students are receiving the services needed.
3. Meeting minutes, agendas, collaborative planning, emails, phone logs will be maintained by the coordinator.
4. Equipment must be inventoried annually.
5. N&D facility staff personnel will serve as the parent liaison for all children at the facility.
6. Facilities must be authenticated based on State based information.

7. All staff will be trained annually on Neglected and Delinquent information.

Parent and Family Engagement

Required 1% Set Aside for Parental Involvement: Each school may utilize a portion of the district's 1% set-aside for parent involvement activities. With assistance from the Title I director and district parent engagement coordinator, schools gather input from stakeholders regarding the best way to use the parent engagement funds. The district parent involvement coordinator provides training to school level staff on how to engage families in the educational process. Title I parents are informed about the 1% set aside during the Fall Annual Meeting and participate in the discussion regarding this requirement each Spring during Title I planning meetings held at each school. If the total 1% is not expended, the difference must be carried over to the following fiscal year.

Calculating Parent and Family Engagement Carryover

A worksheet is provided by the GaDOE to determine the amount of parent and family engagement carryover from the previous fiscal year. The Title I Director will complete and upload this worksheet, along with detailed expenditure report for family engagement for the previous year to the Consolidated Application Attachments tab.

Private Schools

The Greene County School System currently has no Private Schools that have chosen to participate in the Title I program. If the Greene County School System ever has a Private School that chooses to participate, all Title I regulations for private school participation will be followed.

Charter Schools

The district currently has one charter school, and that particular school is not a Title I school. Regarding all federal programs, the district adheres to the same regulations for its charter schools as it uses for other (traditionally governed) schools.

Special State Charter and/or Commissioned Schools

The district does not have Special Charter or Commissioned Schools at this time. Procedures will be put in place if schools are added in the future.

Rank Ordering and Allocation Procedures

For Determining Title I Schools (Eligible Attendance Area Worksheet)

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.
This process should take place starting in April.
2. Determine new schools (public and private) 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 Student Information personnel.
3. 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.

- For each school, list the schools receiving students and indicate the number free and reduced lunch students. Example:

ABC School (receiving students from schools listed below)		
Students From	# of Students	# Free or Reduced
XYZ School	5	2
EFG School	25	23

- Information for all schools in the district will be placed on the large spreadsheet.
- Use this information to complete the Eligible Attendance Worksheet which will be a required attachment to the Title I Consolidated Applications process.

Reservation of Funds

The district uses the information provided by the GaDOE to determine reservations for parental involvement, indirect cost, Neglected and Delinquent.

Homeless Reservation

Homeless reservations may be based on four formulas. The district takes a look at the McKinney-Vento grant and either matches or exceeds this amount. This information is noted on the coordination page for the consolidated application.

Parental Involvement

The district receives more than \$500,000 for Title I, Part A funding. Therefore, 1% of this amount will be reserved for parental involvement.

Private Schools

The private school worksheet (**Eligible Attendance Area Worksheet**) will be completed and attached to the Consolidated Application to ensure that all reservations related to parent/family engagement, instructional lead teachers, professional learning, and paraprofessionals have been reserved.

Professional Qualifications Request for Lesser Amount

Professional Qualification information is determined based on need. Waiver requests are sent to GaDOE for approval. The Title I office will work collaboratively with the district to ensure that non PQ staff in schoolwide schools that are not paid through Title I are given the opportunity to complete the PQ process.

District Waivers

District waivers for set asides will be submitted at the beginning of each school year. A copy of the waiver approval will be kept on file in the Title I office.

Equitable Services for Private School Participants

Currently there are no private school participants in federally funded programs in Greene County Schools. If there are private school participants in the future the district will rely on the calculation feature built into the Consolidated Application in the GADOE portal to ensure accurate calculations in the amount of funds to be

allotted for equitable services to private school participants and their teachers and families, including carryover as appropriate.

Services for Homeless Children and Youth

Program Procedures

- The district is responsible for identifying a homeless liaison and ensuring that the position is listed on the district's organization chart. This position is housed in the Central Office.
- 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 to include bus drivers, principals, central staff, etc. will be trained in the identification and recruitment of homeless students.
- Homeless liaison will provide annual training for all district level and school staff having contact with homeless students.
- Title I principals will receive annual training on the identification and needs of homeless students.
- Title I set-aside for homeless students in non-Title I schools will be based on the needs of the students and using one of the four established methods to determine the needs. Method #2: Reserve an amount of funds greater than or equal to the amount of the average per pupil allocation was used to determine the amount for the Title I, Part A.
- Services for homeless students (tutoring, etc.) will be evaluated based on student academic achievement.
- The District will provide a process for complete and partial transfer of credits for McKinney-Vento Eligible students enrolling or withdrawing from Greene County Schools.

Disputes Regarding Homeless Children and Youth

If a dispute arises over any issue covered in this policy, the child or youth experiencing homelessness 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 experiencing homelessness to all appropriate educational services. 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 parent or unaccompanied youth shall be given every opportunity to participate meaningfully in the resolution of the dispute

Services for Neglected and Delinquent Children (Neglected Set-Aside)

At this time there are not any N&D facilities in Greene County – if this changes the following procedures will be followed:

1. The district will name a person to serve in the capacity of the Neglected and Delinquent Coordinator. This position will fall under Student Services.
2. The coordinator will work directly with delinquent facilities to ensure that students are receiving the services needed.

3. Meeting minutes, agendas, collaborative planning, emails, phone logs will be maintained by the coordinator.
4. Equipment must be inventoried annually.
5. N&D facility staff person will serve as the parent liaison for all children at the facility.
6. Facilities must be authenticated based on State based information.
7. All staff will be trained annually on Neglected and Delinquent information.

Neglected and Delinquent/ Homeless/ Private Schools - Title I Physical Inventory Procedures

Neglected and Delinquent, Homeless, and Private Schools are treated as Targeted Assistance Schools. They must follow the same procedures for equipment usage as TA schools.

1. A tentative schedule of physical inventory is made using a list of Title I schools in Greene County.
2. Contact is made with each school's principal 7-10 days prior to their school's scheduled physical inventory date. Contact is usually made via e-mail to the school's principal. An inventory list is attached to the email for them to review prior to the physical inventory.
3. When the Technology Department designee arrives at the school, he/she will meet with the contact person assigned by the principal to review what the inventory process will require of them. The contact person will be asked to show the technology department representative where the Title I materials, equipment and real property are located within the school. The contact person is asked to also locate the stamps and stickers for their school that the Title I office has provided to identify Title I materials, equipment, real property, etc.
4. The Technology Department representative will use a list of all purchases made by that school with Title I funds, with the exception of consumable items. The clerk attempts to locate each item on the list and if the item is not labeled "Property of Title I", then a stamp or sticker is used to label the item. If the item is a piece of equipment or real property it should be flagged on the list to be added to the equipment list at the end of the inventory process. If the equipment has a serial number, then it should be recorded. The location of the item should also be noted.
5. The inventory will most likely be in multiple places within a given school. Once all of the items are located (or not located), a master list is made indicating "located" or "not located" for each item. Also, a comment box is available to provide further explanation about a particular item.
6. From this master list an equipment list is made listing all equipment and/or real property located at each school. This list includes a description of the item, date purchased, vendor name, serial number (if applicable) and location within the school.
7. The equipment list and the master inventory list for each school will be kept on file in the Title I office for Greene County Schools.
8. Include the following on the Inventory List: facility, PO#, date, vendor, quantity, item description, unit price, total amount, located (yes, no), location, and notes.

Services for Children in Foster Care

"Specific Procedures related to enrolling and withdrawing students in foster care are addressed through GCSS Policy Regulations JBC-5 as guided by OCGA rule 160-4-8-.17 and OCGA rule 160-5-1-.28. Annually, transportation related agreements are reviewed and renewed between the LEA and Local Department of Family and Children's Services related to placement of students in foster care, per ESSA. The LEA also has designated a

Foster Care Point of Contact, who provides case management services as needed per ESSA and the above referenced OCGA rules. Students placed in foster care are allowed similar rights, protections, and processes for school access and stability that are outlined for students experiencing homelessness per McKinney-Vento Law. "

Prevention and Intervention Programs for Children Who Are Neglected, Delinquent, or At-Risk

The district does not have state run N&D facilities at this time. Policies and procedures will be put in place if this information changes in the future.

Title V, Part B – Rural and Low Income

The district does receive Rural and Low Income funds.

The RLIS program is an initiative that provides grant funds to rural local educational agencies (LEAs) that serve concentrations of children from low-income families. Under the RLIS program, the U.S. Department of Education awards funds by formula to State Education Agencies (SEAs) to provide sub grants to eligible LEAs to support a range of authorized activities to support student achievement in order to meet the State's definition of adequate yearly progress (CCRPI).

Eligibility A 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 (as determined by the 2000 Census).

All schools served by the LEA have a school locale code of 6, 7, or 8 (assigned by the U.S. Department of Education's National Center for Education Statistics).

The LEA is not eligible to participate in the Small Rural School Achievement Program.

Use of Funds A LEA may use RLIS funds for:

- (1) Teacher recruitment and retention, including the use of signing bonuses and other financial incentives.
- (2) Teacher professional development, including programs that train teachers to use technology to improve teaching and to train teachers of students with special needs.
- (3) Educational technology, including software and hardware, that meets the requirements of Part D of Title II.
- (4) Parental involvement activities.
- (5) Activities authorized under the Safe and Drug-Free Schools and Communities State Grants program.
- (6) Activities authorized under Part A of Title I (Improving the Academic Achievement of the Disadvantaged).
- (7) Activities authorized under Title III (Language Instruction for Limited English Proficient and Immigrant Students).

Accountability

LEAs participating in REAP-Flex or receiving funding under the SRSA Grant program must use the assessment system that the State uses to fulfill Title I requirements to meet the REAP accountability requirements. SEAs must review the annual assessment data of each LEA under the RLIS program and after the third year of an LEA's participation in the program, determine whether the LEA meets the State's definition of adequate yearly progress. The SEA will provide further direction according to the result of this review.

Procedures for Completing the Title V, Part B Evaluation Report

The Greene County School System receives Title V, Part B funds and implements Title V, Part B activities. The district takes the following steps to complete the annual evaluation report for this program:

- The district program coordinator obtains a Title V, Part B detailed expenditure report from the district accountant.
- The district coordinator reviews all expenditures, comparing the expenditures to the prior year's consolidated application budget.
 - The district coordinator and the administrative assistant sort all expenditures by function and object to determine the dollar amount spent on each function.
 - The sorted functions/objects help the coordinator ensure that all expenditures were also allowable under Title I, Title II, Title III, and Title IV.
- The district coordinator or administrative assistant then enters information from the expenditure report into the Georgia Department of Education online portal.

Title II, Part A, Teacher Quality

Needs Assessment and Planning

Each Spring, the Greene County School System begins the needs assessment process by surveying all leaders, teachers and paraprofessionals. Once survey results are collected, the results are shared with each school. Title II Needs Assessment survey data is retrieved for reviewing along with Equity Plan needs assessment data, as a part of the Strategic Leadership Planning process. Strategic Planning is the overarching umbrella. During Strategic Planning meetings district data is reviewed for trends, goal alignment and progress. From this planning process, CLIP flows.

The community is engaged through the CLIP process. The district office leadership team conducts an annual meeting to discuss all of the information gathered from the schools. Finally, the district involves school administrators and all other stakeholders in the needs assessment to revise the "CLIP", and guide all district efforts. This includes prioritization of needs, and action planning to ensure equity.

School improvement plans align with CLIP, as the data substantiating CLIP goals is the same data to substantiate school improvement goals, based upon derived needs. Additional sources used in determining needs are analyzed data from the Title I Comparability Report, district achievement data (SLDS/CCRPI), student performance data, and administrator and teacher data (TKES and LKES). During the districtwide needs assessment meeting, all stakeholders are guided through a data walk which consists of displays of test data, perception data, and Title survey data.

During the data walk, stakeholders are encouraged to discuss areas of improvement and areas of achievement.

A variety of sources of information are used to determine professional learning needs. Sources include PQ portal reports, Equity data from SLDS Equity Dashboard, schools' GAPSS Analysis information, district wide AdvancED plans, and responses indicated on the School Improvement Plans, District Strategic Plan, formal and informal data collected through school and district needs assessments, surveys, test data, discipline and attendance records, walkthrough observation data, TKES and LKES reports, professional development plans developed for individuals / specialized groups, and other areas of weakness identified in school improvement plans.

Needs assessments components are: (1) recruitment; (2) retention; (3) professionally qualified; (4) professional learning; (5) equitable opportunities for all students. These components are addressed in the equity plan submission.

Equity in Student Access to Effective Instruction

Principals monitor grade levels where experience level is lower than other grade levels. Principals work closely with Human Resources to ensure teachers are highly qualified and have the correct qualifications. Using Soft Search, the GCSS online application system, applications of candidates with experience are flagged for principals. Greene County is committed to ensuring equal access to experienced teachers for all students. Principals are trained to analyze the placement of all students within the classrooms, departments, and grade levels, specialized subjects, study groups, etc. to ensure proper placement. If inequities in teacher experience were to exist, the district would use staff reallocation, teacher induction, and mentor support to address the concern.

Socioeconomic level of the student body and other demographic information is considered and compared with teacher equity data on the GAPSC website. This process continues until the opening of school with additional classes being added as needed. The number of high school classes is determined after course registration takes place in March of each year. During the hiring process, principals and human resources personnel carefully monitor the teaching credentials and years of experience of teacher applicants to insure equity and hire the best applicant possible.

Ineffective teachers will be placed on a required Professional Learning Plan to support areas of weakness. Each school in Greene County reviews and updates their school improvement plan each summer. The school team reviews all available data, including teacher effectiveness and placement of students for the upcoming year. Ineffective teachers will be identified through the implementation of TKES and the review of ongoing data generated, historical and operational data in SLDS. These teachers will be placed on a professional learning plan and will be closely monitored for growth.

It is the district's desire to support and coach up inexperienced and ineffective teachers. However, teachers who are unresponsive to district support will have generated enough documentation for termination of employment. Ineffective new teachers will be afforded enough time and support to demonstrate improvement, prior to becoming tenured. The district will not allow ineffective teachers to become tenured.

Effectiveness Plan

Annually, the LEA submits an Effectiveness Plan and Procedures for Implementing Title II, Part A Funded Activities. For each activity, the following are addressed:

- Funded Component(s)
- Needs Addressed
- Identification of Activity
- Data to be Collected
- Person(s) Responsible for Collecting, Coordinating Review and Analysis of Data
- Timeline for Collecting, Reviewing and Analyzing Data

High Quality Professional Learning

Greene County School System ensures that professional learning occurs in the district or that staff are recipients of off-site professional learning that is of high quality. The district participates in state and RESA sponsored PL that is scientifically research based. Only renowned high-quality vendors, with evidence of program success resulting in increased student achievement are contracted to provide PL in the district.

All certified and classified staff responsible for providing and supporting instruction in the classroom receive high quality professional learning.

Professional Learning delivery models used in Greene County are:

- a. Job-Embedded Professional Learning (Professional Learning Communities, Coaching, Action Research, Looking at Student Work, Book Study)
- b. Online PD Modules
- c. Webinars/Zoom Meetings

Professional Learning impact is monitored through data disaggregation with a focus on achievement, surveys, PL session experience feedback forms, utilization of learning in lesson plans and instructional implementation as assessed via classroom observations.

In determining PL effectiveness, multiple data sources are considered. TLE, SLDS and CCRPI are data sources for determining impact on student achievement. Teacher conferences and reflection sessions also provide input as to the impact of Professional Learning and teacher use of knowledge on student achievement. The LEA invests in assessment and disaggregation tools to better enable data analysis.

LEA Reporting of Professionally Qualified Personnel

Annually, the LEA reports the percentage of professionally qualified personnel in the PSC Equity portal. It is the district's goal to have 100% professionally qualified teachers and paraprofessionals. Details regarding steps taken to attain the goals and what happens when 100% attainment does not occur are outlined in the district's Title II and Professional Learning Handbook.

Ensuring that 100% of Teachers and Paraprofessionals Meet Certification/Qualification Requirements

The Greene County School System seeks to hire qualified teachers, paraprofessionals and administrators. We take the following steps:

- Vacancies are posted by the Assistant Superintendent for Human Resources on the district webpage.
 - o A job description is included as well as job requirements. This ensures that the applicants have met the minimum qualifications to meet the required professional qualifications.
 - o The vacancy is posted as soon as the position is available/vacant, and it remains posted for at least 10 business days.
- Qualified applicants are then eligible to interview with principals.
- Principals make recommendations to the Human Resources Department at least one week prior to local board of education meetings, during which personnel recommendations are approved.
- Once the local board approves the recommended candidates, the human resources director immediately notifies the candidates, who then begin the process of fingerprinting and completing other paperwork.

Professionally Qualified Teachers and Paraprofessionals

The Greene County School System seeks to hire qualified teachers, paraprofessionals and administrators. Vacancies are posted on the webpage for Greene County Schools. A job description is included as well as job requirements. This ensures that the applicants have met the minimum qualifications to meet the required professional qualifications. Qualified applicants are then eligible to interview with principals. Principals make recommendations to the Human Resources Department, and recommended candidates are fingerprinted and complete other paperwork.

Procedures for PQ

- All staff paid from Title I funds must be professionally qualified.

- Staff includes paraprofessionals.
- The Title I office, along with Human Resources, will maintain a list that includes the status of all Title I paid staff.

Procedures for Principal's Certifications

- The federal programs office will prepare a memorandum requesting principals sign the certification forms for all Title I and Title II paid staff.
- The form will be taken from the Georgia Department of Education's website.
- Forms will be signed at the end of December and at the end May and submitted directly to the federal programs office.
- Split-funded personnel should not sign this form.
- This information will be maintained in the federal programs office.

Procedures for Hiring Instructional Paraprofessionals

Procedures for hiring paraprofessionals:

Paraprofessional vacancies are posted locally, in area newspapers and on other public forums. A job description is included. 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 Professionally Qualified. Professionally qualified applicants are then eligible to interview with principals. Principals make recommendations to Human Resources, and recommended candidates are fingerprinted and complete other employment paperwork.

Procedures for Paraprofessionals Tutoring Students

- Paraprofessionals should perform instructional duties under the auspices of a certified teacher.
- Schedules must be submitted to the federal programs office monthly.
- Schedules may be completed in weekly increments.
- The certified teacher must sign-off on the schedule.

The district strives to only hire Professionally Qualified teachers and paraprofessionals. Human Resource personnel and the Title IIA Coordinator are available to assist Principals in the selection process. As recommendations for new employees are received in Human Resources, every potential new teacher and paraprofessional is screened for PQ status, prior to approval by the Superintendent. The same is done for each in-house transfer and district transfer. Human Resources will verify the teacher is certified infield and has met the content knowledge requirement for each subject taught.

In the event the district should hire a non PQ teacher or paraprofessional or transfer a teacher into a position where they are non PQ for the specific subject, then a remediation plan will be developed in accordance with the

guidelines stated in the Title II, Part A Handbook and staff will be enrolled into professional learning experiences to enable them to become Professionally Qualified.

Remediation plans are also required for teachers who do not have clear renewal certificates (i.e., TAPP teachers). The remediation plans are the responsibility of the Title IIA Coordinator, Principal, and Teacher.

Professional Qualification Training for Principals

Principals play a critical role in ensuring that their teachers are assigned to teach courses/content for which they hold the necessary certifications/qualifications to teach. District office staff (Title I Director, Title II Coordinator/Professional Learning Coordinator, and Assistant Superintendent for Human Resources) work closely with principals to ensure they understand and implement PQ requirements.

- The district holds a leadership summit in June of each year. During the summit, the district office staff share PQ requirements and federal program requirements with school leadership.
 - By reviewing the information at this time, principals have enough time (during the summer) to review their teaching assignments and ensure that the assignments meet the requirements shared.
- The district holds an administrator training in July of each year. The Assistant Superintendent of Human Resources reviews PQ information with principals again. Principals have the opportunity to ask questions regarding PQ requirements and teaching assignments.

Parental Notification

The Greene County School System provides all parents notice by letter at the beginning of the school year (July-August) that describes the definition of professionally qualified and describes for parents how they can request teacher qualifications for their child's teacher(s). Special Education Teachers affected by the NCLB certification change will be afforded an opportunity to receive instruction in reading and math, as supported by our local RESA (i.e., reading and math endorsements). The professional learning will assist special education teachers in securing content area certifications (as needed) to expand their flexibility and content specific knowledge.

In the event the district should hire a non-PQ teacher or paraprofessional or transfer a teacher into a position where they are non-PQ for the specific subject, then a remediation plan will be developed and staff will be enrolled into professional learning experiences to enable them to become Professionally Qualified, in accordance with district guidelines. **Remediation plans are also required for teachers who do not have clear renewal certificates (i.e., TAPP teachers).** The Remediation Plan will include coursework and content assessment options for the teacher or paraprofessional to become Professionally Qualified. The plan will also offer assistance with finding preparation material and registration information. If funds are available, the district will offer to pay professional learning experience expenses (in exchange for years of service) and reimburse test fees. The remediation plans are the responsibility of the Title II-A Coordinator, Principal, and Teacher to verify progress made and to have a hard copy on file of the remediation plans in the central office. Depending on the specific option the teacher or paraprofessional plans to take in order to meet the PQ requirement, the Title II-A Coordinator will require proof of registration for the course or content assessment. If the teacher or paraprofessional fails on the first attempt at passing an assessment, the district may provide tutoring, may adjust student schedules, may use collaboration models, and/or may request the teacher register for the next available content assessment. Continuous monitoring will be coordinated between the Educator, Principal, and Title II-A Coordinator, to ensure that all students are provided a Professionally Qualified teacher and/or paraprofessional, as expeditiously as possible.

Greene County ensures that parents have been informed of their "right to know" by having a form letter printed in each student's agenda. **The district's communications coordinator reviews all student agendas for content to include the "right to know" before approving for print. Additionally, "right to know" information is posted on the districts' website for public access and on the front counters at our schools.**

Greene County requires that any long term sub be PQ before being considered for hiring. It is the District's preference to hire retired/former teachers in this capacity.

GCSS 20 Day Notification of Professional Qualifications

In accordance with ESSA all schools are required to provide timely notice to parents when students have been taught for four or more weeks by a teacher who does not meet applicable state certification or licensure requirements at the grade level and subject area in which the teacher has been assigned. Notification requirements apply to all teachers in all schools/programs. Notifications will be sent within ten business days following the four consecutive weeks. For verification purposes notifications must contain: day, month, and year of notification; the name of the teacher who has not met PQ, the name of the school and district; and a statement that the teacher has not met state certification or the district's charter waiver PQ requirements for the grade and subject in which the teacher is assigned. The notification will be sent in a format that ensures parents have the opportunity to receive the information. This may include: first class mail, parent link communication and/or email blast. To the extent practicable, the notification will be in a language the parent will understand. This applies to all teachers in all schools/programs.

Regular Education Teachers:

Notification must be sent when students have been taught for four or more consecutive weeks by a teacher who does not meet the district's PQ requirements at the grade level and subject area in which the teacher has been assigned.

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 do issue grades: 20 day notifications must be disseminated if the teacher does not hold special education certification and content certification or equivalent as aligned with ESSA in-field.

Notifications are not required for paraprofessionals, substitutes, or lack of a clearance certificate.

General procedures:

- Principals will make every effort to hire and assign teachers to courses for which they are professionally qualified to teach. There may be rare instances in which assigning professional qualified teachers to specific courses is not possible. In these rare cases, and after consultation with the assistant superintendent of human resources, district staff will follow the procedures outlined below.
- Upon placement of a teacher who does not meet applicable state certification or licensure requirements at the grade level and subject area in which the teacher has been assigned, the principal will contact the Assistant Superintendent of Human Resources.
- The Assistant Superintendent of Human Resources will indicate to the principal (and make the Title I director aware of) the need to send a 20-day notification to parents and review the requirements.
- Prior to the 20-day mark, the school level Title I Coordinator, along with the principal, will use the GADOE template to draft the parent notification letter, then send the draft to the Assistant Superintendent of Human Resources (cc Title I director) for review. The Assistant Superintendent of Human Resources will collaborate with the Title I director to approve the content of the letter/s and have the letter/s translated, if necessary. Once

approved, the principal will be notified that the Parent Notification letter is ready for dissemination. School level Title I coordinator will assist to implement dissemination and provide the district's federal programs office with documentation of dissemination for district monitoring files.

- On or before the 30th day of school (within 10 days after the first 20 days of school), principals will ensure that the Parent Notification letter is sent to parents/guardians in a format that ensures parents have the opportunity to receive the information. This may include: first class mail, parent link communication and/or email blast. To the extent practicable, the notification will be in a language the parent will understand. GCSS preferred method of dissemination is parent link communication and/or email blast.
- District Title I administrative assistant will:
- Maintain hard copy PQ (binder) and electronic evidence of dissemination to be kept on file in the Federal Programs Office (upload to Title I Crate Portal).
- Assistant Superintendent of Human Resources and principals will recheck PQ status for new hires during the school year, as well as, for teachers reassigned during the school year. Parent notification procedures will be adhered to as the need arises during the school year.

Private School Participation in Title II, Part A

Annually, the LEA notifies private schools within the district's geographic boundaries of their right to participate in federal programs. Consultation meetings are scheduled and held whether or not invited private schools participate.

During the current school year, there are no private schools participating in Title II, Part A. In the event that private schools should participate, Title II guidelines for ensuring equitable provision of services will be followed.

Time and Effort

Time and Effort forms provided by GADOE are used to document work of personnel for whom any part of the salary or wages are paid from federal funds. These forms are due at the end of every month. The LEA maintains copies of all time and effort documents.

District internal controls ensure charges for time and effort submissions are accurate, allowable, and properly allocated.

Federal Awards Payments

After federal budgets are approved in the GADOE Consolidated Application portal for the school year, the LEA begins monthly drawdowns of actual funds expended. LEA accounting records support the request for funds.

Financial and Program Management

The LEA understands fiduciary responsibility and follows its maintenance of effort procedures as outlined in the Federal Programs Handbook for financial and program management.

Inventory and Property Management

The LEA follows its written internal controls for inventory and property management of items/technology purchased with federal funds until disposition takes place as outlined in the Federal Programs Handbook.

Title III-A

The purpose of the state-funded ESOL program is to assist students in developing proficiency in the English language, including listening, speaking, reading, and writing, sufficient to perform effectively in the currently assigned grade level. The purpose of the federally-funded Title III supplemental program is to ensure that limited

English proficient students develop English proficiency and meet the same academic standards that other children are expected to meet. Title III funds are used to supplement both state-funded ESOL and other Title (federal) programs.

Registration

Parents of students who enroll in the Greene County School System for Prekindergarten will be given the Home Language Survey (HLS) at the time of PK Registration. The ESOL /Title III Coordinator or coordinator's designee will maintain the original HLS and notify the appropriate WIDA Certified Screener Administrator(s) and school administration if screeners are needed. The Greene County School System (GCSS) uses central registration for all new students in grades K-12. At the time of registration, whether students are registered online or in person, parents of students who are new to U.S. schools complete a Home Language Survey (HLS) to identify the students' primary (home) language. The survey contains three required questions. An answer of any language other than English indicates that the student is a potential EL. The ESOL /Title III Coordinator or her designee will maintain the original HLS and notify the appropriate WIDA Certified Screener Administrator(s) and school administration if screeners are needed before the forms are filed in the students' permanent records.

Only the original HLS completed at the time of registration in the first U.S. schools is to be used to determine potential ELs. Therefore, in order to identify English language learners (EL), the ESOL/Title III Coordinator or her designee will contact all previous schools of transfer students in order to obtain the original HLS when possible.

Screening for Eligibility

GCSS will screen all potential ELs who have not previously been screened in a U.S. school. Therefore, the following processes will be used to determine which students are to be screened.

New to U.S. Schools	In-state Transfer	Out-of-state Transfer
HLS at time of registration The ESOL/Title III Coordinator or her designee notifies school ESOL teachers and School Testing Coordinators that a potential EL is to be screened. ESOL Teachers administer appropriate Screener	Registration staff capture students in GUIDE and notify ESOL Department of transferring. The ESOL/Title III Coordinator or her designee will review ELP assessments in SLDS The ESOL/Title III Coordinator or her designee will contact the previous school to obtain the original HLS if at all possible and EL determination from the district's screening/testing process	Registration staff will notify the ESOL/Title III Coordinator or her designee of the enrollment. The ESOL/Title III Coordinator or her designee will contact the previous school to obtain the original HLS if at all possible. Also, the ESOL/Title III Coordinator or her designee will determine if the state was a WIDA state or a Non-WIDA state The ESOL/Title III Coordinator or her designee will contact the previous district to obtain the original HLS and all English Language Proficiency results to determine eligibility.

New to U.S. Schools

All potential ELs who have not been previously screened with an ELP exam will be screened within the first 30 days of the academic year or the first 30 days of their enrollment after the beginning of the academic year. WIDA Screeners will be administered by WIDA certified examiners only. GCSS will use the appropriate grade-level WIDA ELP screener from the list below to determine if the potential ELs qualify for EL classification.

1. Kindergarten WIDA-ACCESS Placement Test (K-WAPT)

2. WIDA Screener Online

Kindergarten W-APT Screening

This ELP screener is administered to potential ELs enrolled in PK-the first semester of 1st grade. Students enrolling in kindergarten and first semester kindergarten students will be screened using the Listening and Speaking tests for the K W-APT only. Students who are in the second semester of kindergarten and students who are in the first semester of 1st grade will be screened using all four domains of the K-WAPT.

Eligibility Criteria

2nd Semester Pre-kindergarten - 1st Semester Kindergarten

- If the student's combined Listening and Speaking Score is ≥ 29 , the student DOES NOT qualify as an EL.
- If the student's combined Listening and Speaking Score is ≤ 28 , the student DOES qualify as an EL and is coded in Infinite Campus.

2nd Semester Kindergarten - 1st Semester 1st Grade

- If the student's Listening and Speaking Score is ≥ 29 , AND Reading score is ≥ 11 , AND Writing score is ≥ 12 , then the student DOES NOT qualify as an EL.
- If one or more of the above criteria is not met, the student DOES qualify as an EL and is coded and the date of the ELP Screener will be entered in Infinite Campus by the District ESOL Department.

WIDA Screener Online Screening

This ELP screener is administered to potential ELs enrolled in the second semester of 1st grade through the second semester of 12th grade. This ELP screener is divided into grade-level clusters: 1; 2-3; 4-5; 6-8; 9-12. GCSS will administer all four domains (Listening, Speaking, Reading, Writing) of the appropriate grade-level cluster screener for each potential EL.

Students enrolled in the lowest grade of a grade-level cluster the first semester will be administered the screener for the grade-level cluster below their current grade level. For example, a student who enrolls in 6th grade the first semester will be screened using the Grades 4-5 WIDA Screener.

Students enrolled in the lowest grade of a grade-level cluster the second semester will be administered the screener for their current grade-level. For example, a student who enrolls in the 6th grade the second semester will be screened using the Grades 6-8 WIDA Screener.

Eligibility Criteria

- If the student's Overall Composite score is ≥ 5.0 , the student DOES NOT qualify as an EL.
- If the student's Overall Composite score is ≤ 5.0 , the student DOES qualify as an EL and will be coded and the date of the ELP Screener will be entered in Infinite Campus by the District ESOL Department.

Potential ELs with Disabilities

WIDA screeners may not be appropriate for determining eligibility for EL classification for students with a significant cognitive impairment or students whose IEP precludes the assessment of one or more language domains (students identified as deaf, blind and/or non-verbal). Therefore, GCSS will convene a team to determine if the student classifies as an EL. The team must consist of the parent, an ESOL teacher, the classroom teacher, a special educator, and a school administrator. The team will discuss what educational plan will be best for the student's success and academic achievement.

The IEP team will determine the eligibility of these students for EL classification. The decision can be revisited at any time. The minutes of the meetings will be maintained in the students' cumulative record with evidence supporting the team's decision.

In-State and Out-of-State Transfer Students

GCSS ESOL/Title III Coordinator or her designee will contact the previous school system to obtain the date of the ELP Screener in addition to the EL records. If the date of the original screener cannot be found, the ESOL/Title III Coordinator or her designee will use the first day of the first academic year in which the student was classified as an EL. This date will be entered in Infinite Campus as the date of ELP Screener.

Exit Procedures

In accordance with federal law, ESEA/ESSA Section 1111(b)(2)(B)(ix) and Section 1111(b)(2)(G), GCSS annually assesses ALL ELs in the district to measure the students' academic ELP. As is required by Georgia law, GCSS uses WIDA certified examiners to administer the ACCESS 2.0 or the Alternate ACCESS for ELLs in order to meet this federal requirement. The following guidelines are used for the ACCESS 2.0 and Alternate ACCESS for ELLs score to determine if ELs meet requirements to exit ESOL programs and EL-Y classification.

Kindergarten ELs

-Kindergarten ELs whose ACCESS Overall Composite Proficiency Level (CPL) ≥ 5.0 AND Writing Score of ≥ 4.5 AND Listening, Speaking and Reading Scores ≥ 5.0 are eligible to exit the EL-Y status. The ESOL/Title III Coordinator or her designee will enter the date of exit and reason of exit as ACCESS for EL Proficiency in Infinite Campus.

-Kindergarten ELs who do not meet ALL of the criteria listed above are NOT eligible to exit the EL-Y status.

ELs in Grades 1-12

-ELs in Grades 1-12 whose ACCESS Overall Score ≥ 5.0 will exit the EL-Y status. The ESOL/Title III Coordinator or her designee will enter the date of exit and reason for exit as ACCESS for EL Proficiency in Infinite Campus.

-ELs in Grades 1-12 whose ACCESS Overall Score falls between the range of 4.3-4.9 will have an EL Reclassification Meeting to determine EL-Y eligibility.

1. The ESOL teacher will schedule the meeting and invite parents, content teacher(s), building administrator, ESOL/Title III Coordinator or her designee.
2. The team will review ACCESS scores along with other academic information including NWEA MAP scores, benchmarks, and grades.
3. In light of the data reviewed at the meeting, the team will determine the student's EL classification. Please note that all information is to be reviewed. However, only the ACCESS score of 4.3-4.9 is required for an EL Reclassification Meeting in GCSS.
4. Should the team determine the student is to exit the EL-Y status, the ESOL/Title III Coordinator or her designee will enter the date of exit and reason for exit as EL Reclassification Determination in Infinite Campus.

-ELs in Grades 1-12 whose ACCESS Overall Score ≤ 4.2 are NOT eligible to exit the EL-Y status.

ELs with Disabilities

-ELs in grades 1-12 with significant cognitive impairments that prevent them from having meaningful participation in the ACCESS for ELLs are permitted to be screened using the Alternate ACCESS for ELLs. The IEP teams for ELs whose ELP is assessed through the Alternate ACCESS for ELLs may recommend that the ELs exit from EL-Y status when they meet the standardized threshold established by the state.

-ELs taking the Alternate ACCESS for ELLs and earning an Overall CPL of P2 (Emerging) for two consecutive years: The IEP team may recommend exiting from the EL-Y status.

-ELs taking the Alternate ACCESS for ELLs and earning any other Overall CPL for three consecutive years: The IEP team may recommend exiting from the EL-Y status.

The IEP Team will serve as the EL Reclassification Team and complete the EL Reclassification/IEP Team Rubric for the ELs within 30 days of the beginning of the school year and before the October FTE count.

-ELs taking the Alternate ACCESS for ELLs who do not meet one of the two above qualifications are NOT eligible to exit the EL-Y status.

Compliance Monitoring Protocols

Title III Law requires that districts monitor students for four calendar years following exit from language assistance services. If an exited student transfers to the district during the four-year period following attainment of the previous district's English proficiency criteria, the school will monitor the student for the remainder of the monitoring period. The school must maintain documented evidence that the student was actively monitored throughout the first two years of the monitoring period. ESOL teachers will monitor students' classroom performance and work habits using the Greene County School District Monitoring Form. If data indicates that a monitored student may be struggling in one or more areas, additional academic supports may be implemented through the RTI process. If a reasonable period of intervention and monitoring is unsuccessful and the student's difficulties appear to be related to English proficiency rather than academic deficits or a disability, the RTI team may recommend an English Reclassification Meeting to consider the student's redesignation to EL status with direct ESOL services. Data from the third and fourth monitoring year is reviewed by the district.

Technical Assistance

The Greene County School District will provide the coordination, technical assistance, and other support necessary to assist and build-capacity of all schools to provide instruction and support for ELs and their families. The ESOL/Title III Coordinator or her designee will provide assistance and support to all schools to ensure that Title III requirements are being satisfied and that EL programs and instruction are being implemented. During the District Leadership Training during the summer, the ESOL/Title III Coordinator or her designee will review and update building administrative teams on EL program updates. Each school in the district will continue to receive updated information and resources from the ESOL/Title III Coordinator or her designee during the school year based on results of monitoring of Title III language support programs and feedback from stakeholders. In addition to this support, quarterly updated lists of parents who speak languages other than English will be sent to building administrators to be shared with the appropriate staff within their buildings to ensure parents receive information in a language they can understand.

Parent Notification

Greene County School System follows federal law requiring that the district notify parents annually of their children's eligibility for language assistance services. Such notifications must be made within the first thirty days of school or within 10 days of the student's enrollment in the EL program after the start of the school year. Students new to U.S. schools who qualify as a potential EL according to the HLS, will be screened within 30 days of the first day of school or 30 days of their enrollment after the beginning of the academic year. Parents of students who qualified for EL-Y classification in the ELP Screener will be notified of the initial ESOL services using the Initial Notification of Eligibility for ESOL Services form. The parents of students continuing in the ESOL program based on annual ELP assessment scores will be notified of eligibility using the Continuing

Notification of Eligibility for ESOL Services form within 30 days of the start of the school year.

Students who meet district requirements for Title III program participation will be notified in writing within 30 days of the start of the academic year or within two weeks of beginning the intervention, using the Parent Notification for Supplemental Title I and/or Title III Language Program Services. If a student's eligibility for ESOL services and Title III supplemental language program services are both identified simultaneously, the district will use the Combined Parent Notification for ESOL and Federal Program Language Services form to meet both notification requirements.

These notification distributions will be documented by a photo of the stamped envelopes and a faculty distribution statement containing the documents sent, recipients, signature of faculty members sending the documents and date. Documentation will be filed by the ESOL/Title III Coordinator or her designee and shared with the District Parent Engagement Coordinator.

Refusal of ESOL Service

Parents have the right to decline ESOL services. Upon their request, the ESOL teacher will contact the parents to ensure a clear understanding of the services offered and the educational implications of declining participation in the ESOL program. If the parents affirm their desire for their child to be removed from the ESOL program, the teacher will provide the parent with a waiver form. Upon receipt of a signed parent waiver, the student will be removed from the ESOL program for the remainder of the current academic year. The school will then provide language assistance services through alternate means. A waived student remains eligible for classroom and testing language accommodations and must continue to participate in the annual English proficiency assessment until he/she meets exit criteria. A copy of any signed waiver forms will be kept in the student's record. Should the parents wish to waive ESOL services further than the current academic year for their child, they must sign a new waiver each year.

Records and Maintenance

The Greene County School System maintains records for EL students at the Board of Education Office. Records are kept in a vault that is locked and requires permission of the Literacy Specialist or her designee to access. Each ESOL teacher will have an EL caseload and will create and maintain the records of his/her caseload. In order to ensure ESOL teachers are knowledgeable of the requirements for creating and maintaining accurate records as required by the federal and state governments, the ESOL/Title III Coordinator or her designee will annually train staff on EL recording keeping. The training will cover the required documents for the folders as well as the procedures and expected timeline to add documents and update the folders.

The ESOL/Title III Coordinator or her designee will spot check 5% of records from each school quarterly. The records will be reviewed with a checklist with the documents and dates/timeframes listed below.

Document	Completion/Administration	To be added to Folder
HLS Original, Signed/Date	Completed upon enrollment in US Schools	First document in new folder
ELP Screener Scores/Dates	Administered within 30 days of 1st day of school OR 10 days of enrollment	Second document in new folder

Parent Notification of Initial ESOL Language Program Services	Mailed to parents after ELP Screeners are scored	Third document in new folder
Parent Waiver, if applicable	Completed annually	Within 10 days of receipt
Annual ELP Assessments	Completed annually	Within 10 days of receipt
EL Reclassification Form, when applicable	Completed in EL Reclassification Meetings for students meeting district requirements	Within 10 days of completion
Monitoring documents	Once per semester	Within 10 days of the completion of the semester in which the form was completed
Parent Notification of Continuing ESOL Language Program Services	Mailed to parents annually within the first 30 days of the academic year	Within 10 days of completion
Parent Notification of Supplemental Title I and/or Title III Language Program Services	Mailed to parents annually within the first 30 days of the academic year or within 10 days of the beginning of the supplemental language program beginning	Within 10 days of completion
TPC Invitations, TPC Forms, TPC Notes	Annually based on student TPC dates	Within 10 days of completion of TPC

Identification of Immigrant Students

Immigrant students are those who a) were born outside of the U.S. or Puerto Rico, b) have been enrolled in U.S. schools for less than 3 years, or 36 months, not necessarily consecutive, and c) are between the ages of 3 and 21. Immigrant students are identified during the enrollment process. Those students who meet all three requirements are marked as Immigrant in the Student Information System by September, prior to the first FTE count on the first Tuesday in October each year.

Instructional Programs and Resources

The district currently only uses state-approved instructional models in all state-funded ESOL classes. These models are evidence-based. Requests for supplemental instructional resources needed for use by or with English Learners are submitted to the ESOL/Title III Coordinator or her designee. The director will determine the allowability by considering the following:

1. Are these resources supplemental?
2. Will these resources only be used by ELs?
3. Are these resources necessary for improving English proficiency?
4. Are these resources evidence based?
5. Have these resources proven to be effective?

Funding

The Greene County School District receives direct funding for Title III to “provide a supplemental language instruction educational program”, professional learning to all teachers and administrators who work with ELs, and “parent engagement activities that enhance or supplement the language instruction educational programs for ELs”. The district also uses state ESOL funds to hire the necessary personnel to ensure the needs of English Learners are met. All Title III funds are maintained at the district level and are not allocated to schools. All requests for expenditures of Title III funds must come to the ESOL/Title III Coordinator, and if approved, expenditures are processed.

The ESOL/Title III Coordinator or designee will monitor the Title III funds monthly. In the monitoring progress,

the Coordinator will review drawdowns to ensure that they are correct and match the Title III budget. Additionally, Coordinator will review expenditures to ensure that they match the drawdowns. Any discrepancies in expenditures and drawdowns will be taken to the accounting department where the ESOL/Title III Coordinator and a member of the accounting department will review the discrepancies again and consolidate them. Should changes need to be made to the Title III budget, a request will be made through the GADOE Portal.

Professional Learning

Teachers, administrators, and staff who work with or teach EL students must participate annually in ongoing professional learning related to English Learners. The district uses data gathered from the Comprehensive Needs Assessment to determine appropriate professional learning for the upcoming year. The Title III Coordinator or her designee will provide professional learning for school and district leaders at professional learning days held throughout the school year.

ESOL teachers communicate students' current English Language Proficiency (ELP) scores, Can Do Descriptors and accommodations to staff members at their schools and assist their fellow teachers with identifying appropriate scaffolding techniques and instructional strategies based on these scores.

All instructional staff at all schools that serve ELs receive training each quarter on the ESOL Program, instructional strategies, and family engagement. Additionally, teachers participate in WIDA training and attend selected ESOL conferences annually to increase their professional knowledge and abilities to reach the specific needs of ELs.

Parent, Family, and Community Engagement

Title I schools host ongoing activities for all parents, including the parents of EL students in a language and format parents can understand. The district and schools attempt to ensure that parents of EL students are informed of these activities so that they will be able to better assist their students academically, including understanding English Language Proficiency scores as well as other assessments in which their children participate. During these activities, parents also receive information about school programs and resources, and parents are provided an opportunity to provide feedback and input.

GCSS will also provide parent engagement opportunities for parents of students receiving supplemental language support. The purpose of this will be to educate parents on the purpose of the supplemental language programs and how to assist their children in the language support programs.

Also, GCSS will seek ways to provide parent engagement opportunities beyond face-to-face meetings with parents of ELs. A survey will be conducted annually to determine the best methods of communication for the parents and the types of support needed to assist parents in working with their children for their academic success. Once survey responses are collected, the ESOL/Title III Coordinator or her designee will make adjustments to the parent engagement offerings to meet the needs of the EL parents.

Supplemental Language Support Programs

Greene County School District will provide supplemental language support for ELs who meet district determined qualifications. Each year the ESOL/Title III Coordinator or her designee will review ACCESS scores with the ESOL Department to identify areas of need within the EL population's ELP. Additionally, the ESOL/Title III Coordinator or her designee will share with administrators and teachers of ELs requirements for use of Title III Funds. The team will review data and discuss the best use of Title III funds to support the ELs at all schools. Administrators and faculty will be asked which populations within the EL subgroup would most benefit from language support programs and which programs would best serve those students.

After reviewing the ACCESS data and survey results, the ESOL/Title III Coordinator or her designee will submit

the chosen products for supplemental language support to GADOE for approval. After approval, the programs will be implemented according to the evidence provided or the district's logic model.

Supplemental language supports will be provided during the school day or outside of school hours based on the targeted ELs' schedules and needs. An interventionist will oversee the implementation of the program within each school. The ESOL/Title III Coordinator or her designee will monitor the programs monthly through usage reports and student achievement/growth within the program. In cases where usage reports are not applicable, the program will be monitored through lesson plan reviews, class observations, and/or surveys. The monitoring will be shared with the appropriate administrators and staff and technical support/professional development on implementation provided as needed based on the monitoring. Annually, the ESOL/Title III Coordinator or her designee will evaluate the ELP growth of ELs who received supplemental language support and share this information with administrators and teachers of ELs to help guide decisions for the continued use of the program.

Program Evaluation and Accountability

The ESOL/Title III Coordinator or her designee will evaluate the English language programs annually to determine effectiveness of instruction and supports. The ESOL/Title III Coordinator or her designee will review ACCESS scores with ESOL teachers and administrators to identify trends and areas of need for the EL population as well as determine if portions of the program should change or continue for the upcoming year.

The ESOL/Title III Coordinator or her designee will also evaluate the language instruction by reviewing lesson plans and classes of teachers of ELs. The lesson plans will be reviewed to evaluate the implementation of strategies and tools shared in EL professional development.

Finally, the ESOL/Title III Coordinator or her designee will evaluate the supplemental language programs monthly through usage reports and student achievement/growth reports within the program. The programs will be evaluated annually based on the ELP growth demonstration on the ACCESS of ELs who received supports.

GCSS accredits information and support of the manual to the ESOL Department and Title III-A Department of Georgia Department of Education.

Services to Eligible Private School Children

Currently, there are no private schools participating in federal programs in Greene County.

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 following guidelines will ensure appropriate and equitable participation.

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

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

Private school students who are enrolled in nonprofit private elementary and secondary schools, including those in religiously affiliated schools, located in the LEA generally are eligible to receive services. 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. The LEA is required to provide equitable services to teachers and students in non-profit private elementary and secondary schools.

Documentation for Participation

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

Identification of Participants

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

Third Party Vendor

- Private schools may use a third party vendor to deliver tutoring services to students.
- Private schools may use a third party to deliver tutoring services to students.
- Vendors will provide paperwork (same as SES) and invoice monthly for all students served through the private school.
- The Business Department will make payments after the federal program director verifies payments.

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.

Timeline for Private Schools

Month	Activity
Fall - annually	• Send letter to request participation to private schools who work with students from Greene County. Title I, Title II, Title III, Title IV and Migrant • Hold Private School Meeting consultation-full https://shealy.sharepoint.com/:f/s/ESSAEquitableServices/EIcEhvT1qGJHpFfI2n5RYOcb_veOJR1lfNb4fxDkJ-1cyw?e=i63GbK
Fall - annually	• Gather data and consult with private school to determine services and possible participants

	• Begin to gather data for Eligible Participation Worksheet (link to GaDOE ESSA Equitable Services Allocation Methodology: https://www.gadoe.org/School-Improvement/Federal-Programs/Documents/Ombudsman/FY20%20Allocations/ESSA%20Equitable%20Services%20Methodology%2008.08.19.pdf) • Remind private school that any materials or purchases must be requisitioned and remains the property of Greene County Schools
August	• 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.
September – November	• Visit site to determine services are rendered in accordance with federal requirements. Monitor all services regularly.
November – December	• Send invitation to participate letters to Private Schools for Title I, Part A. • Meet with interested Private Schools in December
January – May	• 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.

AFFIRMATION OF CONSULTATION WITH PRIVATE SCHOOL OFFICIALS Greene County Schools

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

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

Access link below for full details in the ESSA Equitable Services Consultation Guide and Handbook-
https://shealy.sharepoint.com/:f:/s/ESSAEquitableServices/EIcEhvT1qGJHpFfI2n5RYOcB_veOJR1lfNb4fxDkJ-1cyw?e=i63GbK

- How the LEA will identify the needs of eligible private school children.
- What services the LEA will offer to eligible private school children.
- How and when the LEA will make decisions about the delivery of services.
- How, where and by whom the LEA will provide services to eligible private school children, including a thorough consideration and analysis of the views of the private school officials on the provision of services through a contract with a third-party provider.
- How the LEA will assess academically the services to eligible private school children in accordance with §200.10 and how the LEA will use the results of that assessment to improve Title I services.

• The size and scope of the equitable services that the LEA will provide to eligible private school children and, consistent with §200.64, the proportion of funds that will be allocated to provide these services.
• The method or sources of data that the LEA will use under §200.78 to determine the number of private school children from low income families residing in participating public school attendance areas, including whether the LEA will extrapolate data, if a survey is used.
• The equitable services the LEA will provide to teachers and families of participating private school children.
• If the LEA disagrees with the views of the private school officials on the provisions of services through a contract, the LEA must provide the private schools the reasons in writing why the LEA chooses not to use a contractor.

We agree that timely and meaningful consultation occurred before the LEA made any decision that affected the participation of eligible private school children in the Title I, Part A program.

Public School Official	Date	Private School Representative	Date
------------------------	------	-------------------------------	------

School District	Name of Private School Agency or School
The LEA must maintain a copy of this form in its records and provide a copy to the SEA.	

Private School Equipment Inventory

The district has not purchased any equipment for the Private School to date. If private school(s) are ever served, they will follow the same inventory procedures as public schools in the district.

Procedure for Removal of Equipment from Private School

If a private school is no longer participating in a federal program, or if there is no longer a need for the equipment at the Private School, the federal program director will remove the equipment and place it in a LEA school that has a need for the equipment. Equipment will be removed immediately upon notification that the equipment is no longer needed.

Title I, Part C - Migrant Education Program Services

The Migrant Education Program (MEP) is a federally-funded program designed to support comprehensive educational programs for migrant children to help reduce the educational disruption and other problems that result from repeated moves. The purpose of the MEP in Georgia (and the United States) is to ensure that migrant children fully benefit from the same free public education provided to all children and that the unmet education-related needs resulting from their migrant lifestyle are met. The Georgia Department of Education is the direct recipient of Title I, Part C funds and is therefore responsible for ensuring the appropriate and best use of these funds. Greene County does not receive direct funding for Title 1-C.

The U.S. Department of Education established 7 Areas of Concern Unique to Migrant Children and Youth. These concerns guide the work of the MEP in Georgia:

- Educational continuity
- Instructional time
- School engagement
- English language development

- Educational support in the home
- Health
- Access to services

Upon enrollment in the Greene County School System, parents complete an Occupational Survey. The Central Registration Clerk collects the surveys and provides them to the Title 1-C office. Since Greene County is in the Migrant Education Program (MEP) Consortium, these surveys are sent to the Georgia Department Region One Migrant Education Program for determination of eligibility. Eligible students are coded as Migrant in the Student Information System (SIS) by the SIS clerk. The Greene County School System works cooperatively to provide information to the Consortium related to students identified as Migrant including, but not limited to enrollment, transfers into and out of the district, academic progress, additional interventions provided to students, and other information requested or required by the Consortium representative. Migrant students are eligible for any program, intervention, or supports offered to other students in the Greene County School System.

Migrant Coordinator monitors the student information system to ensure that when migrant students enroll in the district, they will receive services. The district would utilize the Home Language Survey at the time of student registration to identify migrant students and families. The student(s) and families would then be referred to the appropriate school social worker to further identify the student(s) and family needs. Should migrant students be identified at a later time, Greene County Schools will amend the budget to reflect the change in the system's migrant status.

Individuals with Disabilities Education Act (IDEA)

Written procedures for IDEA compliance are communicated in the Greene County School System Special Education Implementation Manual 2019-2020 (see link):

https://www.greene.k12.ga.us/site/handlers/filedownload.ashx?moduleinstanceid=2691&dataid=3762&FileName=GCSS%20SPED%20Implementation%20Manual%20FY20_.pdf

Elementary & Secondary School Emergency Relief (ESSER) Funds

In response to the economic outcome of the COVID-19 pandemic in the United States, Congress passed three bills that provided immediate and direct financial assistance to state and local educational agencies through the Elementary and Secondary School Emergency Relief funds. These funds were provided to support areas with the greatest need, where the academic and non-academic components of school districts had the most significant impact due to COVID-19. As additional funding was provided, the funds were intended to support state and local school districts' efforts to safely reopen schools, address significant gaps in learning, and support measures of implementation that will continue to reduce the effects of COVID-19 on students and families.

- **Section 18003 of Division B of the CARES Act-Coronavirus Aid, Relief & Economic Security (CARES) Act**
 - **Equitable Services:** An LEA that receives ESSER funds under the CARES Act (section 18005) must provide equitable services to non-public school students and teachers in the same manner as provided under section 1117 of Title I, Part A of the ESEA.
- **Section 313 of the Coronavirus Response & Relief Supplemental Appropriations (CRRSA) Act**
- **Section 2001 of the ARP Act-American Rescue Plan (ARP) Act- Section 2001**
 - The LEA must reserve at least 20 percent of funds to address learning loss by implementing evidence-based interventions and ensure that those interventions respond to students' social, emotional, and academic needs and address the disproportionate impact of COVID-19 on underrepresented student subgroups.
 - Remaining LEA funds may be used for a wide range of activities to address needs arising from the coronavirus pandemic, including any activity authorized by the ESEA, the Individuals with Disabilities Education Act (IDEA), Adult Education and Family Literacy Act (AEFLA), or Carl D. Perkins Career and Technical Education Act of 2006 (Perkins CTE).
 - Maintenance of Equity: The ARP contains LEA maintenance of equity requirements for FYs 2022 and 2023.

LEA Safe Return to In-Person Instruction Plan

- An LEA that receives ARP ESSER funds must publicly make a plan for the safe return to in-person instruction and continuity of services on its website. Before making the plan publicly available, the LEA must seek public comment on the plan.

Use of ESSER funds for minor or major construction projects

The Greene County School District will ensure that school facility repairs and improvements are solely to reduce the risk of virus transmission and exposure to environmental health hazards, and to support student health needs and inspection, testing, maintenance, repair, replacement, and upgrade projects to improve the indoor air quality in school facilities, including mechanical and non-mechanical heating, ventilation, and air condition systems, filtering, purification, and other air cleaning, fans, control systems, and window and door repair and replacement.

The Greene County School District will ensure the required documentation is on file with GaDOE Facilities once all steps are completed for approval of projects by the ESSER Grants Team.

- Submit all required documentation complying with state law regarding Public Works Construction Projects. O.C.G.A. 36-91-20, 36-91-21, and 36-91- 22
- Revise or withdraw any state capital outlay funded projects where ESSER funding was utilized.
- Verify that the construction project will be completed by the end of the grant period
- Submit required documentation adhering to the Davis Bacon Wage Requirement for all federal contracts and subcontract over \$2,000 for construction, alterations, repairs, painting, and decorating.
- Submit applicable required documents that follow federal construction regulations. 34 CFR75.600-617

Appendix A

* List of Available Forms/Checklists:
Title I Family Engagement Program (FEP) Technical Assistance-Compliance (TAC) Checklist
CLIP Feedback Form
Complaint Resolution Form
Schoolwide Program Checklist For Use by LEA Coordinator and DOE Title I Area Specialists
Equipment Disposition Form
GCSS Substitute Teacher Sign-in Sheet for Federal Programs Documentation
Off-Site Equipment Usage Form (GaDOE Template)
Verification of Disposal Form
<i>*Forms available upon request from GCSS Federal Programs Director.</i>
<i>Handbook Revisions: Oct. 2019; Jan. 2020; Feb. 2020; Sept. 2020; Nov. 2020; March 2021; December 2021; May 2022</i>



Dr. Chris Houston
Superintendent of Schools

Board of Education

Dr. Perry Lee, Chair
Steve Kilgore, District 1
Joe Bashore, District 2
Regina Gainer, District 3
Dr. Maggie Kjer, District 4