

# *Bullock County Schools*



## *Federal Programs Procedural Manual*

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# **BULLOCK COUNTY SCHOOLS VISION & MISSION**

## **Mission Statement**

**The mission of the Bullock County School System is to facilitate learning in safe, nurturing, and developmentally appropriate environments and to produce college and career-ready students.**

## **Vision**

**The vision of the Bullock County School System is to serve as an educational leader in the preparation of STEM/STEAM (science, technology, engineering, arts, and mathematics) professionals, with a strong emphasis on literacy.**

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## **Purpose of this Handbook**

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

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

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

## Purpose of Title I

Title I, Part A is a multi-faceted federal entitlement program designed to “help all children have the opportunity to obtain a high-quality education and reach proficiency on challenging state and academic standards and assessments.” The purpose of Title I 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.” Title I is intended to serve students in core academic subject areas: Reading/Language Arts/English, Math, and Science and Social Studies. Title I is NOT for Foreign languages, Art, Music, Health and PE, Gifted and Talented, or any area other than the core subjects.

The purpose of this procedural handbook is to provide a systematic approach to managing the rules and guidelines of Title I and other federal programs to ensure consistent compliance. Staff may use the provided information to ensure that Title programs are being implemented accurately and effectively.

The information contained in this handbook will promote uniformity in operations as Title staff seeks to carry out official Title duties and responsibilities. The Alabama State Department of Education (ALSDE) provides Local Educational Agencies (LEAs) extensive guidance on the over-arching requirements for Title I via the on-site monitoring document that is used to ensure that LEAs are meeting all statutory requirements of Title programs. These specific requirements from the ALSDE document were used to create this handbook. It is hoped that this handbook will be useful in assisting faculty and staff to comply with all federal programs statutory requirements.

## Title I Monitoring Process

Title I mandates that the content and performance standards for Title I students reflect the same expectations generally held for all children. School reform is encouraged to support school wide projects. Title I programs are monitored by the state to determine the effectiveness of the entire program as well as individual student progress. It is mandated that instruction be individualized; therefore, diagnostic information must be obtained to plan each student’s program.

The Alabama State Department of Education requires that Bullock County Schools monitors the implementation of Title I programs and the expenditure of all funds associated with the program. The specific requirements are as follows:

- (a) LEA/Program Director will conduct self-monitoring of its schools and programs sufficient to ensure compliance with Title Program requirements, including Title I, Part A, Title I, Part C, Title I, Part D, Title II, Part A, Title III, and Title VI, Part B.
- (b) Federal Programs Director will undergo training from ALSDE and other sources to maintain proficiency in Title I program compliance requirements.
- (c) Federal Programs Director will provide technical assistance to local schools.
- (d) Federal Programs Director self-monitoring will include monitoring all program expenditures to verify that all program expenditures comply with Title I Program requirements.
- (e) Federal Programs Director will maintain all documentation LEA may need for future auditing/monitoring according to the LEA Monitoring Form, which is issued annually by ALSDE.
- (f) In years when LEA does not receive an on-site visit, Federal Programs Director will complete the Self- Assessment Checklist and submit it to the Alabama State Department of Education (ALSDE).
- (g) LEA will undergo monitoring by ALSDE on a three-year cycle. LEA/Program Director will participate in training and technical assistance updates as provided by ALSDE prior to monitoring visit.

- (h) 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 ALSDE. The appropriate Title Program Education Program Specialist will monitor implementation of the Corrective Action Plan.

Monitoring is an essential component of ensuring that all facets of the Title I program are being implemented as prescribed by Every Student Succeed Act (ESSA). It is a process of systematically providing technical assistance and collecting data in order to provide information that can guide program implementation. Bullock County Schools Title I Program makes use of monitoring as a means of regular observation and recording of activities taking place in Title I schools. 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 Title I activities are carried out in accordance with federal compliance guidelines
- Monitoring inventory and equipment usage
- Attainment of academic achievement goals
- Compliance with budgetary guidelines

Monitoring by the Alabama State Department of Education (ALSDE) consists of four major components:

1. Monitoring of Expenditures – Local educational agencies (LEAs) must submit for approval an annual budget through the Consolidated Application process. Title I Education Program Specialists review each application and budget to ensure that expenditures are appropriate for the program area before approving LEA budgets. Once budgets are approved, Title I Education Program Specialists track how well LEAs are requesting funds for expenditures to ensure that LEAs are likely to meet the expenditure requirements for Title I funds.
2. Single Audit – LEAs with single audit findings are flagged for technical assistance.
3. On-site Monitoring – An SEA on-site Cross-Functional Monitoring Team visits a LEA to apply the criteria included in the *LEA Monitoring Form*.
4. Self-Monitoring Checklist – LEAs not receiving an on-site visit complete the Self-Assessment Checklist and submit it to the Alabama State Department of Education (ALSDE).

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

- Selection of LEAs to be monitored.
- LEAs are monitored on a three-year cycle. Approximately one-third of the LEAs are monitored each year.
- LEAs were initially randomly selected from each of Alabama's service areas.
- LEAs with audit or monitoring findings requiring a return of monies, or receiving a high number of complaints from parents and other stakeholders are monitored within the year of the LEA audit or monitoring report and the written complaint. For example, if an LEA is audited in FY20 for FY19 and the Division receives the report of findings in FY20 before the end of the monitoring cycle, the LEA would be included in the LEAs to receive an on-site monitoring visit. In addition, on-site monitoring outside of the scheduled cycle may be arranged as needed if an LEA evidences serious or chronic compliance problems.

Title I Education Program Specialists must follow the Division protocol when conducting an on-site monitoring of an LEA. A copy of all documentation is maintained with the SEA.

## **LEA Communication with and Monitoring of Title I Schools and Programs**

Monitoring of Title I schools is a critical component of ensuring that compliance is taking place at each school. During the summer prior to the beginning of the new school year and after the Annual Title I Conference in June, the district Federal Programs Director convenes a meeting of all Title I principals during a summer orientation. Principals receive training on policies and procedures and guidance for operating a Title I program. Principals are given detailed information on expectations and copies of program guidance. Specific training is provided in all facets of Title I. A principal's notebook is provided for each principal and discussed in detail by the Federal Programs Director. This notebook includes information related to timelines, budget forms, inventory information, school-wide implementation, Flexible Learning Plans (FLPs), parental involvement, fraud policy and other areas of Title I as appropriate. Monthly meetings are also held with Title I principals. Specific budget information is given out at these meetings. Phone calls and emails are a daily occurrence between Title I district staff and Title I school staff.

In addition to meeting with principals, the Federal Programs Director meets with the 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. All Title I services are supplemental. This process is monitored through on-going technical assistance, site visits, and through the budgeting process.

### **Onsite Monitoring Procedures**

All Title I schools are subjected to on-going monitoring by the Federal Programs Director throughout the school year. The Federal Programs Director will conduct on-site monitoring of all schools at least once per year to ensure compliance with Title I guidelines. Feedback will be provided to the principals via checklists and descriptive information. In addition, emails, staff meetings, and phone conversations take place throughout the year as a means of providing on-going monitoring and communication with each Title I school.

### **Timeline for Monitoring of Title I Schools**

#### **June-July**

- Provide Summer Workshop for all Title 1 Schools to update principals on any new guidelines and to provide guidance for "new" Title 1 principals. Workshops will include the following topics:
  - Budgets
  - Ordering
  - Compliance
  - Parental Involvement
  - School-wide/Targeted Assistance Programs
  - Monitoring
  - Academic Achievement
  - Inventory
  - Scheduling
  - Ethics/Fraud/Compliance
  - McKinney-Vento
  - Programmatic and Financial
  - Teacher/Instructional Lead Teachers Scheduling

#### **July**

- Work with principals to create and mail required letters and mailed in a timely manner. A two-day annual planning

**August**

- Send ACIP Parent and Family Engagement section home to parents
- Submit names of Title I Paid Employees (Teachers/Paraprofessionals)
- Submit Paraprofessional Daily Schedules for review/approval
- Title I Certified Staff submit daily schedule for review/approval
- Annual Title I Meeting Schedules submitted
- Parent's Right to Know/School Status, Parent Involvement Policy sent in school handbooks
- School/Parent/Student Compact brochure sent with back-to-school information
- Post Parent's Right to Know Letters on school website
- Distribute Title I Parents Right-to-Know letters
- Submit Home Language Surveys, Employment Surveys, and School-Parent Compact
- Conduct Federal Programs Advisory Meeting as a follow-up to Spring meetings; assessment data & dollar figures are available

**September**

- Revise/complete ACIP revision process
- Submit the Title I School-wide Plan for review/approval
- Onsite review of federal programs inventory and Title I School-wide Plans

**October**

- Copies of Parental Involvement Plans placed in Parent Resource Centers
- Submit Annual Title I Meeting documents
- Deadline for Annual Title I Meeting (Sept. 30)
- Distribution of School Parent Compact, Parent Involvement Plans, Deadline
- School Parent Compact Due with checklist
- Submit a copy of the School Parent Compact Assurance Form
- Deadline to notify parents of the location of the Title I School-wide Plan
- Deadline to notify parents of the location of the Parent Resource Center
- Deadline for all parent documents to be posted on Parent Involvement section of school web page (compacts, Parent Involvement Plans, Parent Right to Know, Title I School-wide Plan

**January**

- Periodic Certification for all Personnel Fully Funded (100%) by Title I and Title II Due

**March**

- Stakeholder survey opens for Title I and Title II

**April**

- Summary of Title I stakeholder survey due
- Begin review/revisions of Title I Parental Involvement, Title I School-wide Plans, and School-Parent Compacts
- Stakeholder survey for Title I and Title II closes

**May**

- Spring Title I Input meeting
- Deadline for Spring Title I Input meeting documents (revision of compacts for FY20, revision of Parent Involvement Plans

**June**

- Periodic Certification for all Personnel Fully Funded (100%) by Title I Due
- Onsite review of federal programs inventory and Title I School-wide Plans

**Ongoing Throughout School Year**

- Work with principals on annual revision of plans. The Federal Programs Director reviews the plans and the budgets to ensure that funds are being spent according to the plan and the plan has all the necessary components.
- Monthly meeting with Principals. Additional training as needed.
- Inventory all items purchased by Federal Programs.
- Homeless and N&D programs are monitored by the Federal Programs Director.
- On-going review of school improvement data and plans in conjunction with other central office staff
- 3 times a year (Fall, Winter, Spring) the Federal Programs Director makes on-site visits to review the progress of the school wide plan, school improvement plan and inventory.
- Budgets and purchase orders are reviewed monthly by the Federal Programs Director to assist schools in spending the funds as planned.
- Have Spring Meeting with parents to review parent survey results, revise parent involvement plan and policy; District meeting to revise district parent involvement policy and plan.
- The Federal Programs Director provides technical assistance and meets regularly with principals.

**Schedules**

Each school is monitored according to the timeline provided above.

**Monitoring of Neglected & Delinquent Facilities**

There are no neglected facilities in Bullock County Schools.

**Monitoring of Private Schools**

The Federal Programs Director monitors participating private schools. Invitations for private schools to consult in participation in federal programs the following calendar year are sent in the fall, via receipt delivery. A meeting is held, usually the first week in October, to present information about the programs available to students in private schools. Currently Bullock County Schools is serving one private school (St. Joseph Catholic School).

**Data Review**

Data review for all schools are compiled and discussed during administrative meetings and at the Board of Education meetings. Schools meet and analyze data with the intent of improving instruction. The Plan, Do, Check, Act Cycle is used as the basis for continuous improvement review from the classroom level up to the central office. Administrators and staff review all process and events using this model. All Title I schools have professional learning rooms that are used during the data analysis process. Principals are required to discuss this information with all staff to ensure that they fully understand the data presented. Principals are required to demonstrate to the Federal Programs Director and Assistant Superintendent of Curriculum and Instruction that they fully understand the needs of their school by identifying the root cause of the problems that keep the school from achieving academically. This information is discussed in detail in the updated school-wide plans each year.

Corrective action from previous monitoring is discussed with principals in order to assist them in understanding the critical need for compliance in Federal Programs. In addition, ALSDE monitoring findings from all districts is shared with principals as a means of understanding the impact of noncompliance. Professional learning is provided based on the needs but, in addition, professional learning is used as a preventive measure to ensure that all staff has a clear understanding of all expectations of every facet of federal programs. The Federal Programs Director, along with district level

staff, and outside consultants, provide on-going training as a means of ensuring that all staff are in compliance at all times. Anticipatory training is conducted throughout the year that ties in directly with all facets of Federal Program compliance. All correspondences related to Title I are maintained at the central office level by either the Director of Federal Programs or the Secretary for the Title I Program. The Corrective Actions were shared with the principals, along with the Corrective Action Plan(s). Technical Assistance is maintained either as an archived email or in a monitoring file to include an agenda and sign-in sheet documenting the assistance.

### **Technical Assistance**

Schools are provided a wealth of technical assistance. There is an open door/phone/e-mail type policy with the Director of Federal Programs. Besides the technical assistance provisions following, principals, assistant principals, bookkeepers, and any other Title I personnel call or email with questions for guidance.

- Summer administrative meeting with Title I schools administration
- LEA and School Annual Title I Meetings
- Formal meetings held by the central office (Title I, Administrative, Principals, Parents)
- Formal meetings held by the school
- Informal meetings and conversations held before, during or after other administrative/principal, and other meetings held by the central office
- Informal meetings and conversations held before, during or after meetings held at Title I schools
- Parent involvement meetings/workshops/activities
- Phone calls to and from school personnel
- E-mails to and from school personnel
- Title I Timeline
- Checklists
- Title I Parenting Notebooks listing required documents and due dates
- Samples of required documents
- Face-to-Face Consultations with N&D Administrators
- One-on-One Technical Assistance with Title I School Administrators/Bookkeepers

**Equipment Inventory**

All schools are required to maintain an active inventory of all items purchased with federal funds. All regular federal program items are marked with a label; which has the fiscal year and program. The label is placed on the equipment in a location easy to see. The Federal Programs Director conducts inventory two times per year for all federally funded purchases. A detailed report on inventory is contained later in this document.

**LEA Comprehensive Improvement Plan (CIP) Review Process**

CIP revisions take place annually using prior year data and needs assessment information. The CIP serves as the plan detailing coordination of various federal programs and identification of needs and in-turn budgeting for such needs with federal funds. Department Directors, school and system leaders, as well as community and parent stakeholders are involved in the revision process. Title I parents are sent information inviting them to participate via newspaper, website, and newsletters. The district conducts an annual survey each year that allows parents to provide input on district policies and procedures. Parent input is examined and considered from these surveys. Documentation includes sign-in sheets, agendas, meeting minutes, emails, and returned plans with comments. Copies of comments are kept on file and put in meeting minutes. Several subsequent meetings are arranged to garner input from all stakeholders. For example, input is solicited from district, school, and curriculum leaders at monthly Principal, Administrative Council, and Curriculum Advisory Council meetings. The Federal Programs Director gathers all input and updates the Consolidated Action Plan. The plan is submitted to Superintendent for final approval.

**Bullock County Schools Review Process**

The LEA Comprehensive Improvement Plan is updated annually. CIP revisions take place annually using prior year data and needs assessment information. The CIP serves as the plan detailing coordination of various federal programs and identification of needs and in-turn budgeting for such needs with federal funds. Department Directors, school and system leaders, as well as community and parent stakeholders are involved in the revision process. All parents are sent information inviting them to participate via mail, email, telephone, newspaper, social media, flyers, website, and newsletters. The district conducts an annual survey each year that allows parents to provide input on district policies and procedures. Parent input is examined and considered from these surveys. Documentation includes sign-in sheets, agendas, meeting minutes, emails, and returned plans with comments. Copies of comments are kept on file and put in meeting minutes. Several subsequent meetings are arranged to garner input from all stakeholders. For example, input is solicited from district, school, and curriculum leaders at monthly Principal, Administrative Council, and Curriculum Advisory Council meetings. Input is also sought from district leaders and parents during the annual district parent meeting held in June. The Federal Programs Director gathers all input and updates the CIP. The plan is submitted to Superintendent for final approval.

All Central Office Directors, principals, and staff members are required to participate in the planning, revision, and implementation process. In addition, parents and business leaders in the community are also asked to serve on the revision committee. All 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.

Documentation includes sign-in sheets, agendas, meeting minutes, emails, and returned plans with comments. Copies of comments are kept on file and put in meeting minutes.

## **Parental Involvement**

### **Parent Involvement Policy Overview**

Bullock County Schools has an on-going commitment to our Title I parents. Parental involvement is defined as the participation of parents in regular, two-way, and meaningful communication involving student academic learning and other school activities. Our goal is to ensure that our Title I parents and their children receive extraordinary services and assistance that will lead to improved academic achievement. The district recognizes that parents are an integral part of a child's success in school, starting with the concept of being the child's first teacher. As a conduit for their children's success, the district will assist parents of all socioeconomic levels in the solidifying their ongoing commitment to their child's success.

### **Parent Notification and Communication in an Understandable and Uniform Format**

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

### **Parent Notifications**

#### **School Designation Status - Priority Schools**

Bullock County Schools have two schools designated as a Priority School at this time. The following procedures will be followed.

A school identified as a Priority School will receive the support of the School Improvement Division of the ALSDE. This support will be through the assignment of a School Improvement Specialist who will work with the school on a regular basis and will bring in other staff to support identified areas for growth. Support for schools needing comprehensive services will be provided by the ALSDE, School Improvement Specialists. The LEA would sign a three-year Memorandum of Agreement with the ALSDE on behalf of Priority Schools. The Memorandum of Agreement will outline a set of non-negotiable actions and interventions required of each Priority School aligned with the turnaround principles. The MOA will be developed during the spring of the year before it is to be signed in the fall.

Using the U.S. Department of Education's (US ED) definition and methodology for identification, schools identified, as Priority Schools will receive school improvement support and intervention for a period of three years. Schools will be excised from Priority School status when the school no longer meets the definition of a Priority School for three consecutive years and has reduced the number of non-proficient students by 25 percent over a period of three years. High schools identified as Priority Schools based on graduation rate must increase their graduation rate by eight percent over a period of three years.

#### **School Designation Status - Focus Schools**

Bullock County Schools does not have any schools designated as a Focus School at this time. In the future, if a school does have this designation, the following procedures will be followed.

The ALSDE will work in collaboration with the LEA to analyze student achievement data to identify the largest gaps between groups of students. Based on the analysis of data, the LEA and the ALSDE will determine the interventions required of each Focus School. LEAs will sign a Memorandum of Agreement with the ALSDE on behalf of Focus Schools. The MOA will outline a set of non-negotiable actions and interventions required of each Focus School.

**ESEA Public School Choice**

Bullock County Schools is unable to offer school choice since there is only one school per grade span: K-3, 4-6, 7-8, 9-12, and K-12.

**Flexible Learning Programs**

All Title I Priority and Focus Schools must offer a Flexible Learning Program (FLP). In addition, all Title I Priority and Focus Schools must develop a written plan that outlines how the Title I Priority and Focus Schools will implement an FLP program. The FLP plan must be approved by ALSDE's Title Programs Unit prior to implementation. All Title I Priority Schools and Focus Schools are required to send notices to parents describing the school's status, sharing data and information used to support programming decisions, and explaining how parents may become involved in improving the school. All Title I Priority Schools are required to set-aside 10 percent of their school's Title I allocation for professional learning. Focus Schools are not required to set-aside 10 percent of their school's Title I allocation for professional learning. However, Focus Schools may set-aside funds for professional learning if the need for professional learning is addressed in the school's Title I targeted assistance or school-wide plan. LEAs are required to set-aside a minimum of 5 percent of the LEA's Title I allocation to implement the LEA's FLP program in its Title I Priority and Focus Schools. Set-asides above the minimum 5 percent requirement may come from the LEA's total allocation or the Priority Schools and Focus Schools' allocation and are subject to the equitable services to eligible private school students' requirements (ESEA Section 9401(c)(5)).

**Teacher and Paraprofessional Qualifications**

Parents are informed of their rights to know the qualifications of their children's teacher. This information will be sent home to every parent in the beginning of the year in each student's agenda. The notice will include the specific contact person and telephone number and email address. This information is also made available through district and school websites, and other newsletters sent home with students.

**Highly Qualified Teachers Evidence**

If a student has been assigned to or has been taught for four or more consecutive weeks by a teacher of a core academic subject who is not highly qualified, parents will be provided a timely notice.

- All notices and information required must be in a uniform and understandable format, including alternative formats upon request and, to the extent practicable, in a language that parents understand. Parents may request and receive information regarding:
- Whether the teacher has met state qualifications for the grade levels and subject areas in which the teacher teaches.
- Whether the teacher is teaching under emergency or other provisional status.
- The baccalaureate degree of the teacher and any other graduate certification or degree held by the teacher and the field or discipline of the certification or degree.
- Whether the student is provided services by paraprofessionals.

Parent notification is not required for the following:

- For teachers who do not teach core academic subjects.
- For paraprofessionals who are not highly qualified.

Principals are required to send a letter to the parents of those students who are taught four or more weeks by a teacher who does not meet H Q status. This is to support effective parent communication.

**Parent Involvement Plans**

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

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

### **Distribution of Completed Plans**

Several plans are shared with faculty, staff, students, parents and community members on the school district Federal Programs web site located at:

<https://www.bullockco.org/domain/30>

Plans include district and school improvement plans, parent involvement policies, Title I school-wide plans, comprehensive LEA improvement plan, parents' right to know, complaint procedures, and policy on ethics and fraud, waste and abuse. Many of these plans are included in student agendas. An automated calling system and information in first day packets inform parents about the availability of these plans. Parental input into the content of each plan is solicited during multiple meetings throughout the school year but especially at the annual Title I meeting conducted each fall.

### **School-Parent Compacts**

All Title I schools are required to have parent compacts. It is the responsibility of the principal in coordination with the Parent Involvement Coordinator to make sure that all compacts are reviewed and revised annually. The review and revision will occur in the spring of the year at the school council meetings, and parent workshops. Revision dates will be clearly marked on each compact. An invitation will be sent home to all parents in the school and meeting dates will be given in school newsletters and through the school's web site. The Parent Involvement Coordinator (PIC) will be responsible for setting up meetings and collecting required information (agenda, meeting notes, and sign in sheets). Parent compacts will include responsibilities for the teacher, parent, and students. Compacts will be distributed to all parties involved for signatures in the fall of the year. Copies of the signed parent compacts are kept on file in the school's office. The Bullock 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.

### **Annual Title I Meeting**

All Title I schools are required to hold an annual meeting at the beginning of school. It is the responsibility of the principal in coordination with the Parent Involvement Coordinator (PIC) to arrange meeting times and invite all stakeholders to the meeting. The (PIC) will be responsible for collecting and submitting documentation of the required Title I annual meeting, including a copy of the sign in sheet, agenda, and minutes to the Federal Programs Director. Meetings are also announced via paper copies to parents, web sites, call system, radio announcements, and marquees at each school.

### **Annual Evaluation**

***Process to Collect:*** The annual survey is conducted at the End of the Year Parent meeting. Schools typically choose a brightly colored paper on which to print all Title information, including the survey, which are also posted on the website. Advertisement of the survey and requests for completion occur through the newspaper, website, parent flyers, Parent Link, and radio announcements. The surveys are collected and compiled and the following year's parent involvement activities are built from the responses. The Parent Coordinator is encouraged to use volunteers to help compile survey results.

***Process to Review:*** The results of the surveys are shared among several groups of stakeholders, including, but not limited to, parents, school and central office administration, and the parent involvement coordinator. School councils/Title I advisors and those attending the Title I Annual meeting review the results of the survey while reviewing and revising the school-wide and parent involvement plans and components.

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

The Title I Parent Coordinator, along with the school level Parent Planning Committee, are invited to review the annual spring survey as well as the results from the previous spring surveys. Additions/deletions/revisions are discussed and agreed upon during this meeting. The formatting or revisions are made after the meeting and then sent back to the committee for comment. If no further suggestions are made, the surveys are sent to schools to print and sent to parents without being embedded in other materials.

Parent involvement workshops and activities are planned for the following year from the annual spring survey results. Materials are also purchased for parent resource centers from expressed needs. Many opportunities are provided for building strong parent capacity. The purpose is to ensure effective involvement of parents and to support a partnership among the schools, parents, and the community to improve student academic achievement through, at minimum, the following activities:

- Annual Meetings
- Conferences
- Email Communications
- Phone Calls
- Parent Workshops and Activities
- Family Nights
- Volunteering
- Parent Advisory Meetings
- Open Houses (District and Schools)
- Annual Notification of School Status
- Newsletters/flyers/brochures
- Website Information
- Board of Education Meetings
- Community Sponsored School Activities

**Capacity for Parent Involvement**

Information is provided to school personnel and parents on how to build parent capacity through presentations made during meetings, through response to parent needs on surveys, through information received from the ALSDE Parent Engagement department, and through student handbooks, newsletters/flyers.

The Parent Involvement Coordinator considers and plans based on the six requirements for building capacity by answering the following questions:

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

**Parent Resource Centers**

All schools have parent resource centers. A variety of materials and resources are available to parents for use at the school for checkout, or as handouts. Many purchases are based upon parent requests on the parent involvement surveys (i.e., helping with homework, information regarding bullying).

Schools are required to notify parents of the availability of the resources in the parent resource center. This is typically achieved through a flyer and/or websites and includes information on the types of resources available in or through the resource center.

#### **Required 1% Set Aside for Parental Involvement**

Bullock County Schools receives sufficient funding to require a parental involvement set aside.

#### **School Improvement Plans**

School Improvement Plans are created annually for the school year. School leadership analyzes data to identify and develop solutions to challenges related to instructional strategies, parent involvement, professional learning, and budgets to revise the school improvement plans. During the process of revision, parents are invited to provide feedback. Parents are also sent information inviting them to participate in the revision process at an annual Title I Meeting via mail, telephone, flyers, website, and newsletters. Once revisions are made, the plan is published on the website. Hard copies are also available at the schools.

### **School Improvement (1003a) Interventions**

#### **Monitoring of School Improvement**

ALL Bullock County Schools are Title I Schools and conducts a School-wide Program. This allows all children and all parents an opportunity to have equal access to all related Title I assistance. The LEA will utilize The LEA to build capacity and support the school improvement process in all schools. All schools within an LEA will be involved in school improvement efforts through the work of the LEA, and ALSDE. The LEA will work with schools to implement practices that have proven effective with improving schools. The LEA, along with the ALSDE, will establish clear expectations for personnel as they systemically support continuous improvement in all schools.

#### **Review and Approval of School Improvement and School-wide Plans**

School Improvement and School-wide Plans are updated annually. During school leadership meetings; instructional strategies, parental involvement initiatives, and professional development activities are planned after a careful analysis of various data. Assistance is also provided to schools in their use of school improvement funds to accomplish initiatives in their school improvement and school-wide plans. It is through this process that the LEA oversees the development of school improvement plans.

#### **Professional Development, Analyzing Data, Technical Support and Assistance**

System leaders support schools in developing, revising, implementing and coordinating school improvement and school-wide plans monthly. During the meetings, data is analyzed to identify and develop solutions to challenges related to instructional strategies, parent involvement, professional learning, and budgets.

**Monitoring of Use of Funds**

The Federal Programs Director will meet with each school monthly to review and provide recommendations for budgeting decisions.

**School Improvement 1003(g)(SIG)**

The Bullock County Schools does not currently have any participating schools in this grant.

**ESEA Public School Choice**

Bullock County Schools is unable to offer school choice since there is only one school per grade span: K-3, 4-5, 6-8, 9-12, and K-12.

**Alabama's ESEA Flexibility Waiver and Flexible Learning Program (FLP)**

Alabama's LEAs with schools identified with a Priority or Focus designation are required to offer a Flexible Learning Program (FLP). Flexible Learning Programs (FLP) will initially be funded through a minimum five (5) percent set-aside requirement for any Title I Priority or Focus school. Additional Title I, Part A funds may be set-aside to ensure that a viable FLP program is implemented with fidelity.

**Enrollment**

While students in Priority Schools and Focus Schools are eligible to receive FLP services based on low-income status and their individual student scores on state assessments, LEAs must prioritize Title I FLP funding and services to the students in Priority Schools and Focus Schools base on the following federal rank order:

- First- Students who are eligible for free or reduced priced meals and not meeting standards as identified by state assessment results; and if funding levels allow
- Second- Students who are eligible for free or reduced priced meals and meeting standards as identified by state assessment results; and if funding levels allow
- Third – Students who are not eligible for free or reduced priced meals and not meeting standards as identified by state assessment results; and if funding levels allow
- Fourth – Students who are not eligible for free or reduced priced meals and meeting standards as identified by state assessment results; and if funding levels allow

In the future, if a school does have this designation, the following procedures will be followed. Bullock County Schools will send packets of information to students to enroll in a Flexible Learning Program based on four tiers. Tier I students, composed of students who are eligible for free/reduced lunch and are at-risk of failing, will be served first. If funds are still available after Tier I students have enrolled, invitations will be extended to Tier II students (those who are eligible for free/reduced lunch but are not at-risk of falling. Tier III students, those who are not eligible for free/reduced lunch but are at-risk of failing, will be served next if funds still exist. The final group of students, Tier IV, will be served if funds are remaining after the previous three tiers have been served. The initial enrollment will occur in accordance with DOE requirements and dates.

### **Notification to Parents of Workshop and Eligibility For Services**

All parents will be encouraged to participate in the development of a Flexible Learning Program for any schools designated as Priority or Focus Schools. Parents will be invited using multiple means of communication including radio advertisements, newspaper articles, flyers sent home with students, phone calls, and web site announcements. In addition, notification will be sent via U.S. mail to parents informing them of their child's eligibility to participate.

### **Description of Services**

For each Title I Focus or Priority school the LEA must submit an FLP plan that addresses the following:

- Using school level disaggregated data, what are the areas of weakness (content area(s), subgroup(s), and graduation rate(s) if applicable) that will be addressed by the FLP offered at this school?
- How will the LEA implement an FLP plan that will ensure supplemental academic instructional time that is designed to support the students meeting identified goals and outcomes?
- How will the LEA provide professional learning (PL) for the FLP staff/contractor so instruction is engaging, enriching and tailored to meeting the needs of the students and is not a regurgitation of the teaching methods utilized with the students during regular instructional time?
- How will the LEA ensure that the instructional goals of the FLP students are aligned with Common Core Alabama Performance Standards?
- How will the LEA maximize the enrollment of the students in FLP?
- How will the LEA maximize the attendance of participating students in the FLP?
- How will the LEA monitor the implementation of the program and the tracking of all the required data?

### **Submission of the FLP Plan**

As part of the Consolidated Application, districts will need to submit:

- A list of Title I schools that are required to offer a Flexible Learning Program (FLP), their classification as to Priority or Focus by school and LEA, and the school's Title I status.
- An LEA will project how much the LEA is intending to budget on their Flexible Learning Program (FLP) in the following areas:
  - Administrative Personnel Costs
  - Supplemental Materials / Supplies - LEA office and / or School
  - Evaluation Costs
  - Transportation Costs of FLP Program
  - Instructor Costs – Current Teachers or Contract Instructors
  - Professional Learning Costs
  - Equitable Services for Eligible Private School Students, where applicable
  - Total Cost of the Public-School Choice transportation (parent reimbursement and / or school buses), if applicable
  - Required set-asides
  - Other (as approved by the LEAs ALSDE Flexible Learning Program Specialist)

### **Budgets**

Title I Part A is a federally funded program under the Elementary and Secondary Education Act of 1965 (ESEA). This Act provides federal funds through the Alabama State Department of Education (ALSDE) to local education agencies (LEAs) and public schools with high percentages of poor children to help ensure that all children meet challenging State academic content and student academic achievement standards.

- LEA's must submit, through the Consolidated Application, the Title I, Part A Flexible Learning Program (FLP) budget as a part of the LEA's Title I, Part A budget. The descriptions of all budgeted items must be specific and clearly describe the intent of the expenditure.
- All items budgeted must meet the allocable, allowable, reasonable, and necessary tests described in the OMB Circulars.
- Are the expenditures allowable Title I expenditures:
- Do the expenditures appear to be necessary in light of the LEAs goals and objectives?
- Are the costs of the expenditures reasonable:
- Are the expenditures for core subject areas?
- LEAs will utilize general guidelines for the use of Title I funds and equipment when submitting a budget for the FLP program. The law provides many flexibilities and opportunities for local educational agencies (LEAs) and schools to meet the purposes of Title I. In school-wide programs, and LEA may use Title I funds for any activities that are part of the school-wide program plan. Remember that Priority and Focus Schools may become school-wide programs with less than a 40 percent poverty level. However, all school-wide programs must have an approvable school-wide plan. In targeted assistance schools, however, Title I funds may only be used to meet the needs of participating children, their teachers, and their parents.
- The Elementary and Secondary Education Act of 1965 (ESEA) provides several fiscal requirements that are applicable to Title I, Part A funds. Local educational agencies (LEAs) must maintain the financial effort previously provided with State and local funds to Title I schools. LEAs must provide services to Title I schools that are comparable to those of non-Title I school.
- A local educational agency (LEA) may use Title I funds only to supplement and, to the extent practical, increase the level of funds that would, in the absence of Title I funds, be made available from non-federal sources for the education of students participating in Title I programs. In no case may Title I funds be used to supplant (i.e. take the place of) state or local funds. It is a violation of the supplement, not supplant requirement if an LEA distributes regular state and local funds in a way that discriminates against students in a Title I school. LEAs found to be in violation of the supplement not supplant requirements in the Elementary and Secondary Education Act of 1965 (ESEA) will be required to return all Title I funds used to supplant the LEA's Title I budget. It is important to remember, however, that any determination about supplanting is very case specific; this makes it difficult to provide general guidelines without examining the details of the situation. Because Title I funds are available, the Alabama State Department of Education (ALSDE) uses a set of presumptions of what the LEA would have provided in the absence of the Title I funds based on its behavior in other situations. These presumptions are outlined in Office of Management and Budget (OMB) Circular A-133 Compliance.

Prior to review of any budget submitted for approval, the Title I Education Director reviews the plans for the LEA's FLP submitted through the Consolidated Application Tab for FLPs. The FLP Plan contains eight questions which the LEA must respond to detailing the LEAs program for those LEAs with Priority and Focus Title I schools that are required to set-aside a minimum of five (5) percent of their Title I, Part A allocation for flexible learning academic interventions and supports.

#### **Required Set Aside**

Flexible Learning Programs (FLP) are initially be funded through a minimum of five (5) percent set-aside requirement of Title I for all Priority and Focus School status before the 2025-2026 school year. This minimum five (5) percent set-aside must be a LEA set-aside. LEAs have the option of setting aside monies to provide additional interventions for the LEA's Title I Alert schools or Alert Schools have the

option of using a portion of their Title I allocation in order to implement interventions based on their Alert School status; however, Alert Schools are not required to do so.

LEAs may set-aside additional funds above the required minimum 5 percent to implement interventions (i.e., FLP) in its Priority, Focus, and Alert Schools. This set-aside would be a custom set-aside in a LEA's Consolidated Application that would clearly explain the intervention and list the Priority, Focus, and Alert schools to which applies. This set-aside would not be subject to the requirement to provide equitable services to eligible private school children, their teachers, and their families because public Title I school students, as a whole, do not benefit from those services either.

### **Timeline**

August – Develop list of eligible students based on federal tier guidelines.

September – Mail letters home inviting eligible students.

October – Begin serving students using a Flexible Learning Program.

January – Conduct a second enrollment.

April – Conclude program and complete evaluation.

### **Complaint Procedures**

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

### **Monitoring and Evaluation**

The LEA must submit the following components of an evaluation plan within its FLP plan in the Consolidated Application for *each* Priority and Focus School Served:

- Effectiveness target or overall quantified goal of the program
- Assessment instrument(s) used to measure this target / goal
- Timeline for assessments (rough timelines for administration of pre-test, post-test, etc.)
- LEAs must submit their evaluation plan as a part of their FLP plan.

The Director of Federal Programs and the ALSDE will monitor program data and evaluate performance according to the overall goal as stated in Title I, Part A legislation – increasing academic achievement on state assessments and attaining proficiency in meeting state standards. The evaluation will qualify core program components in an effort to highlight factors that contribute to effectiveness.

Each FLP will be evaluated on the following dimensions:

- Participant Feedback
  - Evaluation Question: What was the overall experience of stakeholders with program?
  - Data Source: Stakeholder surveys
- Service Delivery
  - Evaluation Question: Is the LEA and its FLP program in compliance with laws and regulations?

- Data Sources: Annual monitoring data, Program documentation, Federal reporting, Public reporting, Technical Assistance, etc.
- Effectiveness
  - Evaluation Question: Are programs contributing to increased student academic achievement and performance on state education standards?
  - Data Sources: Student performance on state tests, Pre-Post assessment measures of state standards and academic skills targeting by programs, Performance Flag data, and student growth in schools offering FLP.
  - Evaluation results will be shared with stakeholders and the public and used to inform ongoing program improvement.

In addition, the Director of Federal Programs will make 2 unannounced visits during the FLP per enrollment period to ensure integrity of the program. Finally, the Director of Federal Programs will communicate regularly with the FLP Coordinator and Principal at each Focus School to identify and solve challenges in a timely manner.

### **Transportation**

Transportation is provided to any student attending Bullock County Schools, if applicable.

### **Professional Learning**

Professional learning will be provided to staff delivering the FLP to ensure appropriate instructional strategies are implemented to ensure the success of the students being served. Documents to be maintained: sign-in sheets, agendas, and description of professional learning.

### **School-wide Programs**

ALL Bullock County Schools are Title I School in the Bullock County Schools and conducts School-wide Program. This allows all children and all parents an opportunity to have equal access to all related Title I assistance. School-wide Plans are updated and verified using a checklist at the school after receiving feedback at Annual Title I Parent Meetings. Parents are also invited to a meeting in the spring. All schools will notify stakeholders in multiple ways, notice of the meeting dates will be placed in the newspaper and on the school web site, parents and other stakeholders will be notified by invitation sent from the school and all stakeholders will be notified using the school's phone messaging system. Parents that cannot attend the meeting will be given the opportunity to obtain a copy from each school and submit input before the final revisions are approved. Revision dates will be clearly marked on each plan. The Parent Involvement Coordinator (PIC) will be responsible for collecting the required information (agenda, meeting notes, and sign in sheets). At these meetings, parents and other stakeholders are given an opportunity to provide input on the school-wide Title I Plan, School Improvement Plan, Parent/ Student/Teacher Compacts, Parent Involvement Plans, Flexible Learning Programs, and the Comprehensive LEA Improvement Plan.

### **LEA Guidance**

On-site meetings are held with principals to discuss the current status of their plans in regard to checklist components. Missing or items in need of revision are marked on the checklist and then rechecked when the revised plan is submitted. Copies of agendas and sign-in sheets from such meetings should be collected and stored in a Title I notebook as evidence and documentation of meetings. As previously stated, system leaders support schools in developing, revising, implementing and coordinating school improvement and school-wide plans during monthly meetings. During the meetings, data is analyzed to identify and develop solutions to challenges related to instructional strategies, parent involvement, professional learning, and budgets.

**Development of New School-wide Programs**

There are no new school-wide Title I programs in Bullock County Schools. ALL Bullock County Schools are Title I school and has school-wide Title I status.

**School-wide Program Plan Development**

The school-wide plan is required for Bullock County Schools. This plan is presented, reviews, and revised annually by school and local school council. The plan includes the components in the following school-wide program checklist. Suggestions for revision of the school-wide plan occur at the annual meeting, which includes a discussion of the required component of a school-wide program. After revisions are made, parents are sent a letter stating the plans can be accessed online, at the school, or a hard copy can be mailed to them upon request. This occurs through a flyer that is sent home with students. Sign-in sheets and agendas are required and collected from the annual meeting and other meetings. School-wide program checklists are used to verify that the required components are included in each plan, which includes strategies for the whole school reform. On-site meetings are held with principals to discuss the current status of their plans in regard to the checklist components. Missing or items in need of revision are marked on the checklist and then rechecked when the revised plan is submitted. Parent advisors during the annual meeting concur that the most effective use of funding is in human resources and budgets are developed around human and material needs, as well as professional learning and parent involvement.

**Plan Consolidation**

The Bullock County Schools does consolidate School-wide and School Improvement plans.

**Consolidation of Funds**

Bullock County Schools does not consolidate federal funds.

**Target Assistance Programs**

The Bullock County Schools does not have any target assistance programs.

**Accountability****Audits and Cross Functional Monitoring Findings**

The Bullock County Schools undergoes regular audits as scheduled by the State of Alabama. Correction action plans are created to correct any findings received. The school system will maintain the appropriate documentation to indicate that correction actions have been completed and any findings have been cleared.

Steps to Audit/ Monitoring Resolutions:

- Once the audit/ Cross-Functional Monitoring report is received, the Federal Programs Director will review all items. The Cross-Functional Monitoring report will be pulled from the ALSDE 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 ALSDE/ state auditors as a means of resolution.
- The district has 30 days from the receipt of the findings to respond to the ALSDE.
- The monitoring process and the resolution process are both used as a learning resource.

## **Fiduciary Responsibility**

### **Maintenance of Effort**

ALSDE compares the fiscal effort of the preceding year to the second preceding fiscal year and makes the maintenance of effort determination available to the system through a marked “met” or “unmet” on the consolidated application. Documentation for MOE is only required for districts that do not meet the required maintenance of effort. The Federal Programs Director will pull the MOE information from the Consolidated Application each school year for documentation purposes.

### **Attendance Area Determination**

The Bullock County Schools only has one school per grade band: K-4, 5-6, 9-12, and therefore, attendance area determination is not needed to establish rank order.

### **Allocations and Carryover**

#### **Allocations**

After receiving notification of the Title I, Part A grant amounts from ALSDE, reservations in each budget are set aside for required components such as parent involvement, professional learning, neglected and delinquent, private school per pupil and equitable services, and homeless students. Administrative costs are also part of the reservations, which are not part of the schools’ per pupil amounts. Typically, requests for lesser amounts are submitted for professional learning for high quality teachers.

#### **Carryover**

Typically, carryover funds are allocated in one of two ways: (1) to schools by increasing the per pupil amount or (2) the funds are allocated back to all the schools on an equal basis, giving each school an opportunity to spend the funds. Either way, schools must submit a written description of the expenditure requests. Equitable services are also recalculated depending on an allocation of funds for district level activities.

Monthly budget sheets are monitored regularly throughout the year and calculations are made from these near the end of the school year to determine that no more than 15% will be carried into the following year. Federal Programs Director tracks the spending of each program/school through the year via budget sheets. At the end of the school year, carryover information is updated and reviewed. Parent involvement, Flexible Learning Programs (FLP), and professional development for Alert, Focus, and Priority schools are taken into consideration.

### Reservation of Funds

**Flexible Learning Programs (FLP):** Bullock County Schools has no Focus Schools and is not required to establish a set aside of 5% for FLP.

**Professional Development:** Bullock County Schools does not have any designated Focus Schools and is not required to establish a Professional Development set aside.

**Homeless Children and Youth:** Title I schools are required to set aside funds within their budgets to meet the needs of homeless children and youth. The Federal Programs Director, who is also the Homeless Liaison, annually determines the amount of funds needed to adequately meet the needs of homeless students. The Federal Programs Director trains school personnel including: counselors, Parent Involvement Coordinator, as well as clerks, teachers, and principals to identify children in homeless situations. A home survey is also used to identify homeless students. The Federal Programs Director is consulted if any staff member suspects that a student qualifies for homeless services. The Federal Programs Director then investigates the situation and makes the ultimate determination on whether or not students qualify. When a student qualifies for homeless services notes are maintained related to the situation and a memo is sent to the Student Information Coordinator and the Director of Food and Nutrition. Homeless set aside funds are used to purchase needed supplies and for tutoring services for identified homeless students on an as needed basis.

**Neglected and Delinquent Children:** The reservation amount provided by ALSDE in the Title I, Part A allocation letter and worksheet is the amount set aside for neglected and delinquent children. Currently, there is one residential facility for neglected children within Bullock County Schools' service area. The Annual Survey of Local Institutions for Neglected and Delinquent Children is completed each year and shows that one facility is available.

**Private Schools:** Bullock County Schools currently has no Private School that has chosen to participate in the Title I program. The private school worksheets would be completed and attached to the Consolidated Application to ensure that all reservations related to parental involvement, instructional lead teachers, professional learning, and paraprofessionals have been reserved.

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

### Expenditure of Funds

Upon receiving allocations, the LEA will use a spreadsheet entitled "Blank Budget Worksheet and Narrative Template" to develop a budget for the use of federal funds. Upon completion of the budgeting approval process with school and system title funds, the budget will be entered into the consolidated application system. Once approved at the state level, the Director of Finance will then enter the budget into the financial system software. The Director of Finance will review the budget entered into the financial system against the consolidated application for accuracy and allowable use of funds. Any discrepancies between the entered budget in the local system and the consolidated application must be corrected prior to spending and draw-down of funds related to spending.

Spending will follow the pre-approval process throughout the spending period. The Director of Finance will generate monthly reports from the Finance Department. Monthly reports will be analyzed for expenditures against budgeted funds. The Federal Programs Director will compare detailed monthly

expenditure reports to the consolidated application monthly with the Director of Finance to ensure that expenditures are in accordance with the approved consolidated application.

### **Reasonable and Necessary Use of Funds**

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

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

### **Allowable and Unallowable Costs (200.306(b)(7))**

Any purchases made with Title funds must follow the guidelines for allowable costs. Bullock County Schools Title Programs will follow guidelines as detailed in EDGAR, OMB Circulars (such as A-87), and the Title I Handbook for Alabama. Title I purchases will be aligned with the finding of the Annual Title I needs assessment and areas of need identified in the School Wide Plan. Title I purchases will also adhere to any memos, letters, and/or communication regarding allowable/unallowable purchases. The Federal Programs Director will direct any questionable expense to the Area Program Specialist for further clarification.

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

The Federal Programs Director will work with the principal to determine a preliminary Title I budget once this information becomes available from ALSDE. The budget is submitted to the superintendent, and the superintendent’s leadership team. The Federal Programs Director presents this information to the Board for approval. All approved Consolidated Application budgets for all federal programs will be presented to the Board by the Title I, Federal Programs Coordination once they are approved by the ALSDE. Copies of the meeting agenda, minutes, PowerPoint presentation and approval will be maintained in the Title I office.

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

### **Budget Approval Process**

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

- The budget is approved by the superintendent (budget may be rejected at this level and requests for revisions may be made)
- The budget is approved by the program specialist at the ALSDE (budget may be rejected at this level and requests for revisions may be made)
- The budget amount is approved by ALSDE Accounting
- The budget is adopted by the district BOE
- Monthly the Director of Federal Programs receives an expenditure report from the Finance Director that is reconciled to actual expenditures to ensure accuracy and the reconciliation of discrepancies.

### **Periodic Certification**

Periodic certifications for all Title I paid staff takes place after-the-fact. The process takes place twice yearly. The first one for the year takes place the last work day in December and the second periodic certification takes place at the end of the school year on the last day of school. The forms are signed and kept on file in the Title I office.

### **Split-Funded Personnel**

Bullock County Schools does not fund paraprofessionals using split-funded calculation. If we start, these individuals participate in an annual meeting at the beginning of the year where expectations and guidelines are reviewed. They are then provided with their schedule for the year.

### **Capital Expense Funds**

The Bullock County Schools does not use Title funds to budget items under object code 700 (capital expense).

### **Consultants, Contracts, Purchased Services for Title I Funds**

Bullock County Schools does not currently use Title I Funds for consultants, contracts or purchased services. Should we choose to do so at a later date, the following guidelines will be implemented. Contracts are required for all consultants and purchased services. Agreements are entered into between Bullock County Schools and the consultant. Each contract contains the following:

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

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

### **Travel Expenses**

All travel reimbursements are made according to state travel regulations.

### Supplement vs. Supplant

Title I expenditures are supplemental to schools' budgets. Personnel are in addition to the number required to meet maximum class size as determined by ALSDE. Title I funds are only used to supplement and, to the extent practical, increase the level of funds that would, in the absence of Title I funds, be made available from non-federal sources for the education of students participating in Title I programs. Title I funds are not used to take the place (supplant) of local, state, or other federal funding and are not provided to participating Title I children when the same services are provided to non-Title I children with non-federal funds. Conversations regarding supplement vs. supplant are held quite often throughout the year. The programs/activities provide supplemental services to programs that are required by federal, state, and local law. Title I funds do not support programs that were paid with state or local funds unless there has been evidence of precipitous decline. The Board of Education approved the precipitous decline documentation. Seven teaching positions and one paraprofessional position were among these. Title I is not supporting any programs that are being supported in non-Title schools with state or local funds. All Title I principals 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 from Title I staff for all budgetary requests. The Federal Programs Director reviews budget requests to ensure that supplanting is not taking place.

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

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.

Title funds are not to be used to provide services that would, in the absence of Title dollars, be supported with state or local resources. To test yourself, ask:

- (g) Does federal, state, or local law require this program?
- (h) Did the school provide the program with non-Title I funds in prior years?

If the answer to either of these questions is "Yes" then Title funds cannot be used. Title I funds in a School-wide Program are expected to demonstrate that they are *over and above* the amount provided to all schools in the district. The Bullock County Schools Federal Programs Director will train all parties in Supplement vs. Supplant annually as part of the budgeting process.

OMB Circular A-133 Compliance supplement presumes supplanting has occurred if federal funds are used to provide services that:

- Were required to be made available under other federal, state, or local laws.
- Were provided with non-federal funds in prior years.
- Were provided to Title I participating children, if those same services are provided with non-federal funds to non-Title I children.

An LEA may rebut a supplanting determination if it can demonstrate it would not have provided services had the federal funds not been available. An LEA should maintain documentation including (but not limited to):

- Fiscal or programmatic documentation to confirm that, in the absence of Title I, Part A funds, the LEA would have eliminated services in question.
- State or local legislative action.
- Budget histories.

## **Comparability of Services**

All schools within the Bullock County Schools are School-wide Title I Schools. Therefore, it is not necessary to complete comparability of services.

## **Equipment and Real Property**

Title I inventory is maintained on a spreadsheet by the Federal Programs Director that identifies the item, serial number, and vendor, date of purchase, cost, and location. Equipment purchased with Title funds is permanently marked with "Title I" and the fiscal year in which the equipment was purchased. Physical inventories are conducted annually.

### **Inventory**

Inventory of all equipment and property belonging to any federal program will be identified and inventoried twice yearly. A building-level administrator will verify an inventory of items purchased with Title funds each Fall and the Federal Programs Director will randomly spot-check equipment each Spring. Materials purchased for use in federal programs will be labeled and be utilized in the capacity for which it was purchased. Any equipment, materials and/or supplies purchased with federal funds are considered solely for the use of that program.

At the close of the federal program, or in the event the equipment is no longer usable, materials and equipment will be disposed of following The Bullock County Schools' disposal procedures. Equipment that is damaged, lost, or stolen will be reported to the Federal Programs Director. Damaged and inoperable equipment will be returned to each school's Media Center to be removed from inventory. A police report will be required for stolen property. Lost equipment will be verified by the principal and noted in the inventory. Disposed items must remain on inventory for a period of five years.

### **Lease of Equipment**

Bullock County Schools currently leases a copier at ALL Schools. The contract for the lease was approved during the budgeting process through the Consolidated Application based on ALSDE guidelines.

### **Use of Equipment in Targeted Assistance Schools**

The school system does not have any targeted assistance schools.

### **Site Visits**

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

### **Equipment Disposition Procedure**

When computer equipment is no longer operational, it will be recycled or disposed of. Schools are given the opportunity each summer to dispose of technology that is out of date or no longer operational. The appropriate Technology Disposal Form should be completed and a copy sent to the Federal Programs Director. Inventory records will need to be corrected, printed, and maintained by school Federal Programs Director. At the designated time, the outdated technology is brought to a predetermined location to be recycled under the direction of the Technology Director. The Technology Department will

dispose of and recycle all equipment. The technology department will present the Federal Programs an assurance stating that all data has been removed from all technology devices. Currently, the school system does not receive any money for the recycle or disposal of equipment.

In the event Title I equipment or technology is stolen the following procedure will be followed:

1. File an incident report with the SRO
2. Attach the incident report to the Technology Disposal Form and send to the Federal Programs Director's office.
3. Make corrections to the Title I inventory.
4. Send the updated inventory to the Title I office. The principal must sign and date the inventory spreadsheet.

## **Cash Management**

### **Internal Control Procedures**

#### **Requisition Process:**

After each budget is prepared by the School Leaders and Federal Programs Director and is submitted and approved by the state, each school submits requisitions (as submitted by the principal or designee) that are forwarded to the Title director for approval, then to the Superintendent for his signature. Next, the Director of Finance approves and signs off on all requisitions, and then forwards back to Account/Payable Department. A/P then converts the requisition into purchase orders (PO) and prints the POs with signature affixed. An encumbrance is posted to the accounting records at this time. A/P then faxes a copy of the PO to the vendor, sends a copy signed to the employee who initiated the requisition process and prints a hard copy to be filed at the central office. Goods are received at the school or other location and receiver checks to make sure the order is correct and complete. When the invoice is received at the central office from the vendor, A/P matches the invoice to the PO and forwards to Director of Finance for approval. After approval is obtained, A/P enters the amount into PC Genesis as a claim. A/P processed a check-run on Fridays. Each check is pre-approved by Director of Finance. The checks are run on blank stock and then signed by the following persons: Superintendent or Director of Finance. Then checks are processed for mailing. A check register is produced by NEXTGen Software for each check-run and kept on file in A/P. A copy of each check is attached to PO and invoice and filed in A/P office. Checks are then mailed.

Bullock County Schools use the indirect cost calculation, chart of accounts, and Grants Accounting Online Reporting Systems provided by ALSDE to plan, budget, expend, and draw funds. School and district level budgets are also built based upon the required set asides and amounts for neglected students, private school participation, homeless, parent involvement, professional learning for highly qualified teachers, and the other general provisions as required (public choice and supplemental services).

#### **Reimbursement for Travel**

Employees request "prior approval" for all travel. Prior approval forms are forwarded to the Title director for final approval of alignment of travel with ALSDE approved Title I program budgets. These forms are then coded, copied, filed at central office, and the original returned to school principals who notify the school administrative assistant who codes the substitute sheet for proper reimbursement. Bullock County Schools does not provide cash advancements. Employees pay for lodging, meals, and travel expenses in advance and are reimbursed according to the Statewide Travel Regulations after these costs have been incurred. The system approved travel expense statement form must be utilized for requesting reimbursement. Hotel receipts and conference agenda must be attached to obtain

reimbursement for lodging over overnight travel. Meals and mileage are reimbursed according to the State of Alabama guidelines.

### **Procurement of Goods and Services**

Bullock County Schools 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

### **Monitoring Financial Aspects or Title Program Funds:**

The program director for Title and the finance director monitor monthly expenditures on July 31<sup>st</sup>, August 31<sup>st</sup>, September 30<sup>th</sup>, October 31<sup>st</sup>, November 30<sup>th</sup>, December 31<sup>st</sup>, January 31<sup>st</sup>, February 28<sup>th</sup>, March 31<sup>st</sup>, April 30<sup>th</sup>, May 31<sup>st</sup>, and June 30<sup>th</sup> using general ledger detail reports to insure program expenditures are in alignment with the approved budget and that they meet and do not exceed the grant award. When the last day of the month falls on the weekend or school holiday, the monthly monitoring of expenditures will take place on the next work day.

The Title director requests monthly budget detail reports to verify that only approved Title program purchases were paid from the appropriate Title program funds. If errors are found, the Title director and finance director meet to resolve the discrepancy. The Title director is responsible for asking for the monthly budget detail reports and the financial director is responsible for providing the report within 3 days of the request. The Title director is responsible for bringing any discrepancies or an “all clear” report to the Finance Director. The Finance Director is responsible for working with the Title director to resolve the discrepancy. The print out of monthly expenditures and budget sheets will be kept on file in the Title Director’s office in the appropriate Title program notebook.

### **Draw Down of Title Program Funds**

Within two weeks after monthly budget detail reports are approved, the Finance Director will draw down funds. After drawdowns are completed, the Finance Director will provide the Federal Programs Director with a copy. This process will occur more frequently when spending warrants it.

### **Reporting Procedures**

Copies of completion reports for the previous fiscal year will be kept on file in the Finance Department. Accounting records to support the results of outlays (expenditures indicated in the completion report will be kept on file in the Title I office and Finance Department. Copies of expenditure (cumulative through) reports for the respective quarter for total expenditures reported to ALSDE will be kept on file in the Title I office and Finance Department. Federal Programs Director will run budget summary and detailed expenditure reports for all 402 funds. Federal Programs Director gives budget summary reports to each administrator/school at monthly Principals’ meeting.

### **Services for Homeless Children and Youth**

Bullock County Schools homeless liaison works very closely with school guidance counselors to assure students receive needed services.

### **Identification**

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

### **Program Procedures**

- The district is responsible for identifying a homeless liaison.
- 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 will be trained in the identification and recruitment of homeless students.
- The homeless liaison will provide annual training for all district level and school staff having contact with homeless students.
- All principals will receive annual training on the identification and needs of homeless students.
- All schools will display flyers, brochures, and posters that identify the Homeless Liaison contact information.
- Services for homeless students (tutoring, etc.) will be evaluated based on student academic achievement.
- Follow BOE policy

### **School Selection**

The Bullock County Schools only has one school per grade span: PreK, K-3, K-6, 4-5, 6-8, 9-12, and K-12. Therefore, school selection is not an issue.

### **Enrollment**

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

### **Information Dissemination**

The Homeless Coordinator and/or Principals provide information to faculty and staff on the Homeless Program annually in the fall. The Parent Involvement Coordinator distributes posters and brochures in the counselor's office and Parent Involvement Resource Room in each school. Posters and brochures are also distributed throughout the Bullock County community, the Workforce Development Office, and DHR.

### **Transportation**

Bullock County School District does provide transportation for students, if applicable.

**Disputes (Compliant Procedures)**

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

**Services for Neglected and Delinquent Children**

The purpose of Title I, Part D is to improve educational services for children and youth in local and State institutions for neglected or delinquent children and youth so that such children and youth have the opportunity to meet the same challenging State academic content standards and challenging State student academic achievement standards that all children in the State are expected to meet. The purpose is also to provide such children and youth with the services needed to make a successful transition from institutionalization to further schooling or employment and to prevent at-risk youth from dropping out of school, and to provide dropouts, and children and youth returning from correctional facilities or institutions for neglected or delinquent children and youth, with a support system to ensure their continued education.

There is one neglected institution within the boundaries of the Bullock County Schools. If a neglected institution were to move into the boundaries of Bullock County Schools, funds would be set aside in the Title I budget for their students. These funds would provide an afterschool tutor, as well as supplies and computers on an as needed basis.

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

**Class Schedules and Calendar**

Students residing in neglected institutions would attend school on the campus of the Bullock County Schools and follow the same academic calendar and schedules as all students in the school system.

**Parental Involvement**

Students residing in neglected institutions would attend school on the campus of the Bullock County Schools. Therefore, the Parental Involvement Plan at each school serves as the plan for the families that house neglected students. In addition, house parents of neglected students receive the same invitations to Parental Involvement activities as all other students in the school system.

## **Title VI, Part B – Rural and Low Income**

### **Purpose**

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.

### **Use of Funds**

An eligible 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 Part A of Title I;
6. Activities authorized under Title III

## **Pre-Kindergarten Programs**

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

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

## **Title II, Part A - Teacher and Leader Effectiveness**

### **Purpose**

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

### **Equity Belief Statement**

The Bullock County Schools believes all students should have equitable access to quality instruction. The Bullock County Schools strives to recruit, prepare, train and support high-quality teachers, paraprofessionals and leaders in our school system. We are also focused on developing school and district level improvement plans with measurable objectives that will ensure that all teachers teaching core academic subjects are and remain highly qualified.

### **Annual Needs Assessment Process**

Bullock County Schools conducts its annual needs assessment in the spring of each year. The survey is open to all administrators, teachers, and paraprofessionals, local community and business leaders, and addresses the following equity components: highly qualified status of teachers and paraprofessionals, student access to experienced and effective teachers and leaders, teacher ability to meet the diverse needs of students, student access to comparable class sizes, and the retention and recruitment of highly qualified and effective teachers and leaders.

### **Equity Plan**

The Bullock County Schools Equity Plan for Title II-A is revised each May/June using needs assessment survey and other forms of current data. The Equity Plan serves as the plan detailing professional learning and effective equitable practices among teachers. Department Directors, school and system leaders, as well as, community and parent stakeholders are to be involved in the revision process. As the Equity Plan is revised, it is shared with elementary, middle, and high school councils. The LEA seeks input from administrative staff, teachers, community business partners, and parents and then gives feedback for revisions. Meeting agendas and sign-in sheets will be maintained as evidence and documentation of stakeholder involvement in the revision process.

### **Prioritization of Needs**

Internal and external stakeholders are involved in the planning process by assisting with the prioritizing of needs. Prioritization of needs is accomplished by analyzing the percentage of responses to various questions on the annual needs assessment. In addition, prioritization is discussed with stakeholders during meetings. Information gathered from various meetings is discussed with the school staff. The LEA then combines the feedback from various stakeholders and creates a final prioritized list of needs.

### **Authorized Use of Funds**

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

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

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

### **Professional Learning**

Professional Learning must be of high quality, sustained, intensive, and classroom-focused in order to have a positive and lasting impact on classroom instruction and the teacher's performance in the classroom. It must also address one or more of the annual LEA prioritized needs. Finally, professional learning must focus on increasing the ability of the teaching staff to help all students achieve high academic standards, or the school administrative staff to lead their schools' efforts to increase student academic achievement

### **Highly Qualified Teachers**

Bullock County Schools systematically monitors the HQ status of its teachers based on demographics and a written remediation plan is created for each teacher who does not hold a valid clear renewable certificate or that is not highly qualified. The plan is monitored and supported with Title II-A funds. In compliance with ESEA, Bullock County Schools requires that all school principals meet with the director of Teaching and Learning, and the non-HQ teacher to develop a remediation plan. These logs must be kept on file for periodic review.

**Recruitment, Placement, and Retention of Highly Qualified, Effective Teachers and Leaders**

The LEA discusses the recruitment, placement, and retention of highly qualified, effective teachers and leaders during monthly meetings as necessary. The topic is also discussed at part of a review of data from the system annual needs assessment annually. The Director of Teaching and Learning provides each principal with a report of the level of retention from the previous school year and improvement with the placement of highly qualified, effective teachers for the upcoming school year. System and school goals are then created or adjusted for the next school year.

**Teacher Experience and Effectiveness Equity**

Teacher effectiveness is measured using two methods. First, informal focus walks are conducted at each school by administration and instructional coaches to gather data that can be used to guide professional learning activities. Secondly, administrators conduct formal observations as part of the Alabama Teacher Evaluation Program.

Identified inequities in teacher experience will be addressed at the school and classroom level by re-assigning personnel and students as necessary to ensure that all students have equitable access to experienced teachers. The counselors and principal must sign an internal document indicating completion of this process.

A list of inexperienced and ineffective teachers will be maintained at the school level. Rosters will be maintained for students assigned to any teacher on the lists. These rosters will be used the following school year to ensure that students are not assigned to an inexperienced and/or ineffective teacher two years in a row. The counselors and principal must sign an internal document indicating completion of this process.

**Retention**

Over the past few years, the teacher retention rate has been moderately stable. Approximately one to five percent of the teaching staff is replaced due to attrition. Teacher retention is analyzed annually in order to determine if a particular school may be experiencing a high teacher turnover. The Faculty, Staff, and Administrators Survey and exit survey are designed to gather information from teachers and other supporting staff in the area of retention.

- A system wide New Teacher Induction Program is implemented prior to the beginning of the school year. New teachers attend a two-day session of purposeful break-out classes conducted by system wide support staff. Special Education teachers attend a third day of induction.
- Each school principal develops and implements an on-going orientation and induction program for new teachers assigned to their school.

**Class Size Equity**

The LEA will address inequities in class size across and within schools by re-assigning students as necessary to achieve equity. The counselors and principal must sign an internal document indicating completion of this process.

**Meeting the Diverse Needs of Students**

Focus walks are conducted by school personnel (administrators and instructional coaches) as part of a system initiative to ensure that all classrooms follow the guidelines of a standards-based classroom. One of the items on the observation checklist is the use of differentiation to meet the diverse needs of students. The data from these focus walks is compiled at the school and system level, examined by the system Curriculum Advisory Committee and used to plan professional learning initiatives.

**Procedures for HQ**

At the beginning of each year and when preparing set asides for the consolidated application, the Federal Programs Director, who is also the Title IIA Director obtains information regarding the status of highly qualified teachers. This information is then used to determine the professional learning set aside amount for high quality teachers. A request for lesser amounts is typically submitted on the consolidated application. All teachers who are paid with Title I funds are required to meet HQ status. The professional learning director sets aside funds to help teacher meet HQ status, if necessary.

**Procedures for Principal's Attestations/Certifications**

The Director of Federal Programs will prepare a memorandum requesting principals sign the attestation forms. The principal attestation form is provided to the principals at the beginning of the year and a due date is also provided. Copies of the attestations are maintained at each school, at the district office, and are available to the general public upon request.

**Procedures for Hiring Instructional Paraprofessionals**

Paraprofessional vacancies are often filled from within. Often individuals who work for Bullock County Schools express an interest in vacancies if they occur. If not, the vacancy would be advertised in the local newspaper. A job description is included and Paraprofessionals 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 AACE (Alabama 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 AACE paraprofessional Assessment to be eligible for a Alabama Paraprofessional Certificate.

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

**Procedures for Parent Notification of Non-HQ**

Principals will adhere to parent notification requirements for non-HQ staff. Copies of the parent letters will be given to the Federal Programs Director.

**Inventory**

The designee selected by the principal maintains inventory at the school level. Inventory is documented in a database that is updated each time equipment is purchased. All Title II property is identified by permanent markings on the equipment that signify Title II and the fiscal year the equipment was purchased. The database includes a description of the item, serial number, and vendor name, date of purchase, funding (Title I, Title II, MV, Title III, Title VI, Sp. Ed., Migrant, SIG), cost, school, equipment location, and current condition. School personnel must annually verify the location and condition of the equipment. Each item must be checked/noted on the inventory record specifically for condition and location. Principals attest that the equipment is as identified on the inventory record submitted to the Federal Programs Director. Technology personnel help determine the condition of equipment. When a piece of equipment needs to be disposed of, disposal forms are completed and kept on file. Disposal occurs according to the Bullock County Schools disposal procedures. Hard and electronic copies of

the inventories are filed with the Federal Programs Director. The Federal Programs Director conducts onsite monitoring of inventory at least three times a year.

### **Private Schools**

Private Schools within the boundaries of the LEA are contacted via certified letters of their eligibility of limited English proficient and Immigrant students to participate in Title II, Part A services. Letters are distributed twice a year in the fall and the spring. A meeting is planned where all private schools within the boundaries of Bullock County Schools are invited to attend. The Director of Federal Programs maintains the agenda and sign-in sheets for the Private School meetings.

### **Effectiveness**

Director of Federal Programs will prepare a report on the effectiveness of each budget line item in the Title II, Part A program. The report will include a careful review of data to summarize the effectiveness of all funded activities.

## **Title III: English to Speakers of Other Languages**

### **Purpose**

An ESL program plan is designed to provide consistent and non-discriminatory procedures throughout each school within Bullock County Schools as recommended by the U.S. Office for Civil Rights, Department of Education. The Civil Rights Acts of 1964 requires local school districts to provide an alternative program of service when there are students who are limited English proficient and are unable to participate effectively in the district's regular instructional program. Bullock County Schools has an EL Plan for 2018-2019 that is located in the Federal Programs Director's Office and emailed to all ESL teachers and school leaders. The plan includes EL procedures, evidence of policy dissemination to local schools, research-based delivery models used at each school, description of how ACCESS data is used to make instructional decisions, evidence of adjustments to services based of assessment results, progress monitoring procedures for EL students, and the process and criteria used for transitioning ELs to monitored status. Each school codes all EL eligible students in the student information system (PowerSchool). LEA professional development plan for ESL, including needs assessment, long-range professional development goals, meeting dates, session agendas, handouts, and sign-in sheets. All information concerning Title III is kept by the Director of Federal Programs. Title III purchase orders, budget, and after-the-fact (January and May) periodic certifications are monitored and kept on file in the Federal Programs office. Bullock County Schools has no private schools requesting to participate in the Title III program. Private Schools within the boundaries of the LEA are contacted via certified letters of their eligibility of limited English proficient and Immigrant students to participate in Title III, Part A services. Letters are distributed twice a year in the fall and the spring. A meeting is planned where all private schools within the boundaries of Bullock County Schools are invited to attend. The Director of Federal Programs maintains the agenda and sign-in sheets for the Private School meetings.

### **Student Assessment and Enrollment Procedures**

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

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

### **Exit Guidelines**

According to ALSDE guidelines, “In order to exit language assistance services, a Kindergarten student must score an Accountability Composite Proficiency Level (CPL) of 4.8 or higher with no individual domain score less than 4.8. Kindergarten students who do not score an Accountability CPL of 4.8 or higher and who have any individual domain scores less than 4.8 are not eligible to exit language assistance services. Using the Language Assessment Conference (LAC) process to exit Kindergarten students who do not meet the specified exit criteria is not an option.

Students in grades 1-12 who score a Composite Performance Score of 4.8 or higher on the Tier C version of the ACCESS for ELLs and a “Meets Standards” score on the grade level state-mandated reading assessment are considered English proficient and are to be exited from language assistance services.

Students in grades 1-12 who score at or above 4.8 on Tier B or C on ACCESS may be referred for Language Assessment Conference which can determine whether a student remains in the program or may exit based on a review of language proficiency, classroom performance and achievement, teacher recommendations, criterion-referenced tests, and writing samples.

Students in grades 1-12 who score below 4.8 Literacy Sub-Score on ACCESS for ELLs Tier B or C, may also be referred for a LAC where the decision to remain or exit is made.

Students in grade 1-12 who score at or above 4.8 Literacy Sub-Score on ACCESS for ELLs Tier B or C automatically exit the program and are monitored for two years.

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

**Funding**

While the Bullock County Schools does not receive direct funding for EL students, the school system is part of a consortium of districts with small ESL populations. Funds are available through the consortium to purchase instructional materials and resources for the EL program. Specific requests should be made to the Director of Federal Programs.

**Professional Learning**

ESL teachers will meet with every regular education teacher of EL students and administrators to ensure understanding of the WIDA standards and Can-Do Descriptors. ESL teachers will also provide W-APT and ACCESS scores for every student and assist teachers with understanding appropriate expectations based on these scores and the student's level of language acquisition. Two meetings will be held yearly with parents of EL students to inform them of ways to assist their students academically, as well as make them aware of school programs and activities.

**Program Evaluation and Accountability**

The success of the ESL instructional program will be measured by analyzing the results of ACCESS and other state mandated tests. As a result of this analysis, differentiated instructional decisions will be made for individual students, including adjusting services if indicated.

**Services for Private Schools (If applicable)**

Invitations for private schools to consult in participation in federal programs the following calendar year are sent in the fall, usually October, via receipt delivery. A meeting is held to present information about the programs available to students in private schools. All federal programs directors are invited to the meeting, which is complete with an agenda and sign in sheet. Upon receipt of the intent to participate form, which is provided to private school officials, a meeting is held to discuss plans and the required components of Title I services for private school students. Meetings are scheduled every two months to discuss the progress and process of Title I series. Currently Bullock County Schools is not serving any private schools.

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

When a private school determines that the school would like to participate in Title I or Title II, the district will determine the per pupil allocation for qualified students. The 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 Title I services:

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

Private school students who are enrolled in nonprofit private elementary and secondary schools, including those in religiously affiliated schools, located in the LEA generally are eligible to receive services. Some *ESEA* programs restrict eligibility or participation to a particular group of students, such as LEP students, in which case the eligibility or participation of private school students likewise is

restricted. See the Department’s guidance on individual programs for specific eligibility requirements. See also J-1: *Federal Resources and Guidance*.

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

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

### **Documentation for Participation**

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 attendance area of possible students. It is the responsibility of the private school to provide potential students names, addresses, and verification of free and reduced participation for qualification of the student.

### **Finance**

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

### **Complaints**

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

### **Evaluation**

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

### **Equipment**

The private schools will follow the same procedure as Bullock County Schools.

### **Timeline for Private Schools (If applicable)**

Month	Activity
September	<ul style="list-style-type: none"> <li>Send letter to request participation to private schools who work with students from Bullock County Schools for the following school year. Hold Private School Meeting consultation</li> </ul>
September	<ul style="list-style-type: none"> <li>Gather data and consult with private school to determine services and possible participants</li> </ul>

	<ul style="list-style-type: none"> <li>• Begin to gather data for Eligible Participation Worksheet</li> <li>• Remind private school that any materials or purchases must be requisitioned and remains the property of Bullock County Schools</li> </ul>
August of following year	<ul style="list-style-type: none"> <li>• Verify addresses of students attending private school that wishes to participate</li> <li>• Begin services</li> <li>• Note: If there is a third party vendor, see policy for third party vendor from ALSDE. Sign a letter that states the requirements on both parties to enter into agreement.</li> </ul>
September-November	<ul style="list-style-type: none"> <li>• Visit site to determine services are rendered in accordance with federal requirements. Monitor all services regularly.</li> </ul>
January – May	<ul style="list-style-type: none"> <li>• Visit site to determine services are rendered in accordance with federal requirements.</li> <li>• Monitor all services regularly.</li> <li>• Plan for evaluation of services with a survey at the end of April.</li> </ul>

### **Title I, Part C - Migrant Education Program (MEP) Services**

Bullock County Schools uses the occupational survey provided by the MEP coordinator to identify migrant students. A system liaison from the Migrant Educational Program (MEP) makes contact with each migrant family to determine case-by-case eligibility and needs. Migrant students are evaluated academically the same as other students in the system to determine academic needs. All migrant students are eligible for Title I services, and receive appropriate Title I services. In addition, a referral is made to student services to indicate that additional services may be needed from that department. Additionally, specific activities to address the needs of migratory families are provided. Such activities shall include informing children and families of, or helping such children and families gain access to other education, health, nutrition and social services. A migratory Parent Advisory Council (PAC) program is provided in conjunction with other Parent Involvement Programs. Parent outreach is provided in a language that is understood by the family if at all possible. A translator is used for translation when needed. Parents are presented information on ESL, special education, gifted, and other educational programs. Information on health, nutrition and social services is presented using materials from the migrant educational agency. Presenters from local agencies such as, the Health Department, DHR, and County Extension office may be involved. Currently, Bullock County Schools does not have a Migrant Education Program.

## **Charter Schools**

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

### **Special State Charter 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.

## **Complaint Procedures**

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

### **Ethics and Fraud, Waste and Abuse**

The Title Director reviews the ethics and fraud, waste and abuse policies with all administrators during the summer. An agenda and sign in sheets will be kept by the Federal Programs Director to document this has been completed. This same information is discussed with all system personnel during pre-planning annual system wide faculty meeting. The Federal Programs Director maintains agendas and sign-in sheets to verify the policies have been reviewed with all staff. A signature, by the person reviewing the policies, verifies the completion of this procedure. Principals are expected to inform their faculties about policies and updates as they are approved throughout the year. New teachers also receive the same information during New Teacher Orientation.

### **Ethics**

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

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

### **Reporting Suspicion of Fraudulent Activities**

- Purpose:** To ensure the reporting of suspicion of fraudulent activity, the Bullock County Schools provides employees, clients and providers with confidential channels for such reporting.
- Definitions:** Fraud: A false representation of a matter of fact, whether by words, by conduct, or by concealment of that which should have been disclosed, that is used for the purpose of misappropriating property and/or monetary funds.
- Statement of Administrative Regulations:**  
The Bullock County Schools thoroughly and expeditiously investigates and reported cases of suspected fraud to determine if disciplinary, financial recovery and/or criminal action should be taken.
- Confidentiality:** All reports of suspected fraud must be handled under the strictest confidentiality. Only those directly involved in the investigation should be provided information regarding the allegation. Informants may remain anonymous but should be encouraged to cooperate with investigators and should provide as much detail and evidence of alleged fraudulent acts as possible.
- Procedures and Responsibilities:**
1. Anyone suspecting fraudulent activity should report their concerns to the Bullock County Schools, School Superintendent, or Finance Director.
  2. Any employee with the Bullock County Schools (temporary staff, full-time staff and contractors) who receives a report of suspected fraudulent activity must report this information within the next business day.
  3. Employees have the responsibility to report suspected fraud. All reports can be made in confidence.
  4. The Bullock County Board of Education shall conduct investigations of employees, providers, contractors, or vendors.
  5. If necessary, the person reporting will be contacted for additional information.
  6. Periodic communication through meetings should emphasize the responsibilities and channels to report suspected fraud.

### **Assessment Security**

Testing Coordinator: Derrick Harris

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

1. Each school has an assigned School Test Coordinator.
  - Ms. Tiffany Davis, has supervisory authority over the Test Examiners and is responsible for the security of the testing materials while in the Union Springs Elementary School.

- Mrs. Jalissa Maddox-Jones, has supervisory authority over the Test Examiners and is responsible for the security of the testing materials while in the South Highlands Middle School.
  - Ms. Deborah Johnson has supervisory authority over the Test Examiners and is responsible for the security of the testing materials while in the Bullock County High School.
2. Each School Test Coordinator receives training from the System Test Coordinator.
    - School Test Coordinators receive initial training on the State Assessment Handbook policies and procedures each August as the new Handbook is made available from the DOE. A copy is made and given to each School Test Coordinator for their office.
    - Training includes our local BOE policies and procedures.
    - Extra time and special consideration is given to testing security and the testing of special populations as those items may change from year-to-year.
    - Each School Test Coordinator is trained additionally and specifically prior to the administration of any norm-referenced and/or state mandated test. Specific procedures and policies are reviewed with the System Test Coordinator.
    - Confidentiality and the required security procedures from the ALSDE and BOE are reviewed and this information is signed by the School Test Coordinator to certify that this information was reviewed thoroughly prior to the receipt of every assessments' materials.
  3. Each school has established a program and schedule to ensure that all Test Examiners, Proctors, and Monitors are properly trained for each test administration.
    - School Test Coordinators prepare agendas and training material to ensure training adheres to state and local regulations.
    - Each Test Examiner and Proctor signs appropriate forms indicating review of security and confidentiality procedures before, during, and after testing.
    - All Test Examiners are trained during a faculty meeting for each test administration ensuring specific training that may be required for different assessments.
    - Extra certified teachers are trained in the event of an absence or emergency.
    - All training participants sign indicating their training for each specific test.
    - Principals are present at each training session.
  4. A testing roster is developed for each Test Examiner.
    - Roster is reviewed to ensure that no relative is inadvertently placed in the testing room of a guardian or relative.
  5. A master list of all students and their accommodations is verified by School Special Services Director prior to testing and scheduling.
  6. All Test Examiners of students with special accommodations are trained in a second session.
    - This allows each test examiner to review in the Test Administrator's manual the precise wording allowed by the ALSDE. The oral reading is explained in detail within the

Examiner's Manual provided by the ALSDE. This includes voice tone, inflections, timing, and any allowed repetitions.

- Test examiners review students' accommodations. (see attachment entitled "Accommodations Matrix") The Accommodation Matrix is included in testing tub which is distributed to Test Examiner on the day(s) of the test(s).
7. All test materials are in a secure room which only a Master/Master key can unlock and an additional deadbolt and its key. Only the School Test Coordinator and System Test Coordinator have access to the keys to the deadbolts. Rooms are kept locked at all times while testing materials are in the room.
  8. All test materials are signed for by the School Test Coordinator when delivered to that secure testing room.

#### *After Receiving Test Materials in the School*

9. School Test Coordinator ensures integrity of the security of the testing storage area.
  - Keys are the sole responsibility of the School Test Coordinator.
  - No one is allowed in testing storage area without the School Test Coordinator or her designee.
10. School Test Coordinator manually counts all testing materials.
  - Any discrepancies are reported to System Test Coordinator and then to ALSDE.
  - School Test Coordinator retains all lesson plans once test materials are moved to individual schools to support that test review was never altered as a result of tests being on site.
11. School Test Coordinator prepares containers at each school for each testing room with the exact quantity of materials, rosters, and accommodations if indicated.
  - School Coordinator prepares test containers as indicated by state requirements.
  - School Coordinator places test booklets with same form number if oral reading is required.
  - School Coordinator secures all prepared tubs in testing storage room.
  - School Coordinator prepares form with the inventory number of each test booklet assigned to the individual student that is signed out and signed back in by the Test Examiner each testing day. Test Examiner and School Test Coordinator or Assistant School Test Coordinator verify and sign that the count is correct in the presence of each other. A sample verification form is included as an attachment to this document.
12. Teachers remove/cover all instructional materials from walls, cabinets, and desks in the classroom several days prior to testing. Only a wall clock is permitted.
13. Desks are placed in positions to discourage any communication and cheating among students.
14. School Principals conduct a walk-through in every classroom several days prior to testing and verify the classroom as "test-ready".
15. Test Monitors are available in each hallway during each day of testing should assistance be necessary.

#### *During Testing*

16. #2 non-mechanical pencils with erasers are provided to students.
17. Test Examiner writes the inventory number/form number of test booklet assigned to each student in the testing room.

18. Test Examiner verifies that student has bubbled correct form number and required demographic information.
19. Test Examiner records start and stop time of each testing session.
20. Test Examiner reads the test script *exactly* as directed with no deviations.
21. Test Examiners and proctors routinely walk by student desks to monitor students are following directions and are working in the correct test sections and answering in the appropriate section of the answer document.
22. Test Examiner notes any unusual occurrence on the testing log or roster that could cause an inflated or deflated score.
23. Any transfer of student answers to a new answer document due to erasure holes, etc. is documented on a form that witnesses sign at the time of the transfer. School Test Coordinator is present at this time.
24. Test Examiners, Proctors, and Monitors are instructed NOT to read a student test. The only exception is for an "oral reading" accommodation.
25. Test Examiner reports any problem with a student test booklet to the School Test Coordinator immediately.
26. Test Examiners, Proctors, and Monitors are instructed NOT to discuss test questions or answers with anyone, including students.
27. Document any verbalized student concern about a test question/answer to the School Test Coordinator who will relay the information to the System Test Coordinator who will contact the ALSDE.
28. Verify that testing procedures are strictly followed.
29. Test Examiner should contact Test Coordinator immediately if any situation arises that might impact test results. STC, with the aid of the System TC, may contact the ALSDE with concerns.
30. School Test Coordinator must contact School Principal immediately if any situation arises that might impact test results.
31. Each day staff will announce to students the test that will be completed that day.
32. All make-up testing will be administered using the same testing procedures as the original testing.

#### *After Testing*

33. Test document cleanup must be done in a group setting with the School Test Coordinator.
34. Test Examiners may not cleanup the documents of the students they taught or tested.
35. Testing materials should be collected and verified promptly after each testing session.
36. All testing materials will be stored in secure area until returned to System Test Coordinator.
37. System Test Coordinator will document date and time for departure and arrival from School Test Coordinator to System TC. All materials will be inventoried and signed for by both TCs.
38. Materials will be packaged according to vendor's instructions and ALSDE timelines.
39. Materials will remain in locked secure storage until pickup by the appropriate carrier.
40. School administrator will sign for student scores to encourage security and confidentiality.
41. Each school has a procedure to distribute test scores to teachers and parents that ensures protection of the individual student based on confidentiality laws.
42. Each school retains all testing rosters, lists, signatures, agendas and training documents.
43. Principal Certification form is completed and maintained by the System Test Coordinator for five years.
44. Superintendent Certification form is completed on January 30 and July 31 in the portal as required by the ALSDE.

45. Events and circumstances or departures from standardized testing procedures are irregularities. They may have an impact on student performance that is not possible to define or quantify. They are reported and student scores will be flagged to note that conditions under which this score was obtained is different. Use caution when interpreting this score.
46. Test Administrators will report any Irregularity to the School Test Coordinator.
47. The School Test Coordinator sends irregularities to System Test Coordinator for verification and to obtain the correct code.
48. The System Test Coordinator contacts the ALSDE immediately for direction.
49. As instructed by the ALSDE, the System Test Coordinator may be told to investigate and complete the Testing Irregularities Documentation Form provided online on the MyALSDE Portal. Improperly coded irregularities may default to the holding of those test scores.
50. Examples of Irregularities include materials inappropriately distributed; directions not being followed; improper monitoring of test administration.
51. Other irregularities that affect the student performance and/or the integrity of the test can result in the invalidation of student scores. These can include content being coached, disclosed, cheating, and responses being changed during or after testing by the Test Administrator.
52. Participation Invalidations are for those students who receive an accommodation that is not on the list of state-approved accommodations or not on the student's IEP. When inappropriate accommodations are used, those students' scores may not be used when determining CCRPI calculations.
53. Irregularities specific to the End-of-Course Tests include the System Test Coordinator specifying the form number of the test when entering the information in the Portal. Portal documentation will include if a score should be invalidated or counted as an irregularity. Additionally, the appropriate irregularity or invalidation SDU-B code and corresponding bubble will be used on the paper answer document.
54. Specific Breaches of Professional Ethics per the Professional Standards Commission include the following: gives examinees access to test questions prior to testing; copies, reproduces or uses in any manner inconsistent with test security regulations all or any portion of secure test booklets; coaches examinees during testing, or alters or interferes with examinees' responses in any way; makes answers available to examinees; fails to follow security regulations for distribution and return of secure test materials as directed, or fails to account for all secure test materials before, after or during testing; uses the secure test booklets for any purpose other than examination; participates in, directs, aids, counsels, assists, encourages, or failed to report any of these prohibited acts. All must be reported immediately to both the System Test Coordinator and Building Principal.
55. All Test Examiners are required to review the Code of Ethics annually with the hierarchy of consequences.
56. In the event of an Irregularity, Invalidation or Participation Invalidation, the Examiner will notify the Principal and the School Test Coordinator. The School Test Coordinator will notify the System Test Coordinator. The System Test Coordinator will notify the ALSDE immediately. The System Test Coordinator will request a detailed written statement from all parties involved and follow up with all parties involved if necessary. Final documentation will be entered into the Portal by the System Test Coordinator.

## Appendix A: Complaint Procedures

### A. Grounds for a Complaint

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

### B. Federal Programs for Which Complaints Can Be Filed

- Title I, Part A: Disadvantaged Children, Academic Achievement Awards, School-wide Programs
- Title I, Part C: Migrant Education Program
- Title I, Part D: Programs for Neglected or Delinquent Children
- Title II, Part A: Teacher and Leader Effectiveness
- Title II, Part D: Enhancing Education Through Technology
- Title III, Part A: English to Speakers of Other Languages
- Title VI, Part B, Rural Education Achievement Program

### C. Complaints Originating at the Local Level

As part of its Assurances within the ESEA program grant applications and pursuant to Section 9306 within the Title I, Part A of the Elementary and Secondary Education Act of 1965 (ESEA), an LEA accepting federal funds must have local written procedures for the receipt and resolution of complaints alleging violations of law in the administration of covered programs. Therefore, a complaint should not be filed with the Alabama State Department of Education until every effort has been made to resolve through local written complaint procedures. If the complainant has tried to file a complaint with Bullock County Schools to no avail, the complainant must provide the Alabama State Department of Education written proof of their attempt to resolve the issue with Bullock County Schools.

### D. Filing a Complaint

A complaint must be made in writing and signed by the complainant. The complaint must include the following:

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

The complaint must be addressed to:

Mrs. Terri B. Holcey, Federal Programs Coordinator, Bullock County Schools, P.O. Box 830090,  
Tuskegee, AL 36083

Once the complaint is received by Bullock County Schools it will be copied and forwarded to the Federal Programs Director.

### E. Investigation of Complaint

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

- The date Bullock County Schools received the complaint.

- How the complainant may provide additional information.
- A statement of the ways in which Bullock County Schools may investigate or address the complaint.
- Any other pertinent information.

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

**F. Right of Appeal**

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

## BULLOCK COUNTY SCHOOLS

### Complaint Form for Federal Programs under the Elementary and Secondary Education Act

**Please Print**

Name of (Complainant):	Mailing Address:
Phone Number (Home):	Phone Number (Work):
Person/department complaint is being filed against:	
Date on which violation occurred:	
Statement that the Bullock County Schools has violated a requirement of a federal statute or regulation that applies to an applicable program (include citation to the Federal statute or regulation – attach additional sheets if necessary):	
The facts on which the statement is based and the specific requirement allegedly violated (attach additional sheets if necessary):	
List the names and telephone numbers of individual who can provide additional information.	
Please attach/enclose copies of all applicable documents supporting your position.	
Signature of Complainant:	Date:
Mail or deliver this form to: Latashia Jackson Bullock County Schools 202 Kennon Street Union Springs, AL 36089	
Date Received:	Date of Response to Claimant:

