



Bessemer City Schools Federal Programs Handbook

2025- 2026



Disclaimer: *The contents of this handbook are currently under revision by the Federal Programs Department of Bessemer City Schools. This handbook is subject to change at any time given updates in federal or state legislation or guidance. The contents of this handbook is provided as technical assistance to support the administration, planning, implementing, monitoring, and evaluation of Title I School-wide/Targeted Assistance Programs. This information and documents are based upon the USDOE policy guidance, non-regulatory guidance and the Every Student Succeeds Act (ESSA). Additional ESSA legislation, regulations, and guidance can be obtained through the USDOE website at <https://www2ed.gov/documents/essa-act-of-1965.pdf>. Any questions not addressed in the handbook should be directed to an assigned Bessemer City Schools (BCS) federal programs staff at 205-432-3004/205-4323021.*

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Federal Programs Overview

The *Elementary and Secondary Act of 1965*, as amended by *Every Student Succeeds Act of 2015*, provides financial assistance to local educational agencies (LEAs) and schools with high numbers or high percentages of children from low-income families to help ensure that all children meet challenging state academic standards.

Title I is the nation’s largest federal assistance program for schools. The goal of Title I is to help every child get a high-quality education. Title I resources are directed toward students who need them most. Services may be provided at a non-public school who wish to participate.

As an LEA, our goal as Bessemer City Schools Federal Programs Department is to administer all federally funded education programs by providing technical assistance to schools through the support of continuous improvement plans and Title budgets, planning, implementation, evaluation, and monitoring for compliance with federal statutes and regulations.

2025-2026 Title I Schools

School Name	Principal
Abrams Elementary	Ashley Buckelew
Charles Hard Elementary	Adriene Evans
Greenwood Elementary	Angela Bedgood
Jonesboro Elementary	Erika Tanks
Westhills Elementary	LaToya Walker
Bessemer City Middle School (CSI)	Lisa Heard
Bessemer City High School (CSI)	Dr. Timothy Perry

MPS Federal Programs Department Directory

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SECTION 1:

Purpose of Title I

What Is Title I?

Title I, Part A of the Elementary and Secondary Education Act (ESEA), as amended by the Every Student Succeeds (ESSA) Act, is designed to help disadvantaged children reach high academic standards.

The Purpose of Title I

ESSA requires that an eligible school operating a school-wide or targeted assistance program must develop a comprehensive plan that is designed with the involvement of teachers, principals, parents, etc.

The purpose of Title I is to ensure that all children have a fair, equal, and significant opportunity to obtain a high-quality education and reach, at a minimum, proficiency on challenging State academic achievement standards and state academic assessments. This purpose can be accomplished by —

1. Ensuring that high-quality academic assessments, accountability systems, teacher preparation and training, curriculum, and instructional materials are aligned with challenging State academic standards so that students, teachers, parents, and administrators can measure progress against common expectations for student academic achievement;
2. Meeting the educational needs of low-achieving children in our Nation's highest-poverty schools, limited English proficient children, migratory children, children with disabilities, Indian children, neglected or delinquent children, and young children in need of reading assistance;
3. Closing the achievement gap between high- and low-performing children, especially the achievement gaps between minority and nonminority students, and between disadvantaged children and their more advantaged peers;

4. Holding schools, local educational agencies, and States accountable for improving the academic achievement of all students, and identifying and turning around low-performing schools that have failed to provide a high-quality education to their students, while providing alternatives to students in such schools to enable the students to receive a high quality education;
5. Distributing and targeting resources sufficiently to make a difference to local educational agencies and schools where needs are greatest;
6. Improving and strengthening accountability, teaching, and learning by using State assessment systems designed to ensure that students are meeting challenging State academic achievement and content standards and increasing achievement overall, but especially for the disadvantaged;
7. Providing greater decision-making authority and flexibility to schools and teachers in exchange for greater responsibility for student performance;
8. Providing children an enriched and accelerated educational program, including the use of school-wide programs or additional services that increase the amount and quality of instructional time;
9. Promoting school-wide reform and ensuring the access of children to effective, scientifically based instructional strategies and challenging academic content;
10. Significantly elevating the quality of instruction by providing staff in participating schools with substantial opportunities for professional development;
11. Coordinating services under all parts of this title with each other, with other educational services, and, to the extent feasible, with other agencies providing services to youth, children, and families; and
12. Affording parents substantial and meaningful opportunities to participate in the education of their children.

Overview of School-wide Programs

What Is A School-wide Program?

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

- Conduct a comprehensive needs assessment
- Identify and commit to specific goals and strategies that address those needs; ●
Create a comprehensive plan

- Conduct an annual review of the effectiveness of the school-wide program and revise the plan as necessary

Adopting this strategy should result in an ongoing, comprehensive plan for school improvement that is owned by the entire school community and tailored to its unique needs.

The Title I school-wide process supports the creation of high-performing schools by encouraging schools to make significant, even radical, changes in how they do business, and providing them with a comprehensive process for doing so. Developing and implementing a high-quality schoolwide program is a systemic, effective strategy for increasing the academic achievement of all students.

The school-wide authority also reflects the following fundamental principles of Title I, as amended by the NCLB:

- Accountability for results. In a school-wide program, accountability for results is shared throughout the school. All students are expected to meet the State's challenging standards, and students who experience difficulty mastering those standards are provided timely, effective, additional assistance. Teachers use information about student performance and share ways that instruction can be improved to meet a wide range of student needs. The school keeps parents informed of the achievement of individual students, and of the progress of the school in meeting its goals.
- Evidence-based practices. School-wide programs operate according to a plan that contains proven, research-based strategies designed to facilitate school-wide reform and improvement. Professional development activities are based on practices proven to be successful in helping teachers improve the quality of their instruction.
- Parent and family engagement. Staff in school-wide programs engage parents and the community in their work as planners, participants, and decision makers in the operation of the school. This collaboration is based on a shared vision of the school's values and

Over-all mission. These partnerships strengthen the school's ability to meet the needs of all students and improve the school.

B. Core Elements of School-wide Programs

ESSA established high standards of accountability for State and local educational agencies (SEAs and LEAs), by requiring them to raise the achievement of all students, including students in the nation's poorest schools. States must describe how schools will close the achievement gaps between major subgroups of students, make adequate yearly progress (AYP), and ensure that all students, including those who are educationally disadvantaged, meet the State's academic achievement standards.

The school-wide approach to achieving these ambitious goals is based on the premise that comprehensive reform strategies rather than separate, add-on services are most effective in raising academic achievement for the lowest achieving students in a school. A well-designed and implemented school-wide program touches all aspects of the school's operation and offers an appropriate option for high-poverty schools seeking to improve achievement for all students, particularly the lowest achieving.

In general, school-wide programs-

- ❖ Plan for comprehensive, long-term improvement
- ❖ Serve all students with highly qualified teachers and paraprofessionals
- ❖ Provide continuous learning for staff, parents, and the community
- ❖ Use research-based practices to develop and implement enriched instruction for all students
- ❖ Use inclusive approaches to strengthen the school's organizational structure
- ❖ Consolidate resources to achieve program goals¹
- ❖ Engage in continuous self-assessment and improvement

There are three core elements of a school-wide program.

1. A school operating a school-wide program must conduct a comprehensive needs assessment that identifies the school's strengths and challenges in key areas that affect student achievement. Title I schools utilize the Cognia's eProve Diagnostics as a valuable and required component to conduct a comprehensive needs assessment.
2. The school must develop a comprehensive school-wide plan that describes how it will achieve the goals it has identified as a result of its needs assessment. ***The school's Continuous Improvement Plan (ACIP) is developed within Cognia's eProve Strategies platform.*** The school-wide plan must--
 - a. Conduct Comprehensive Needs Assessment (e.g., eProve Diagnostics)

1

Unless otherwise noted, all references to ESSA in this document refer to the Elementary and Secondary Act of 1965 (ESEA), as amended by Every Student Succeeds Act (ESSA) of 2015.

- b. Identify School-wide Reform Strategies, aligned with the needs assessment, that are evidence-based and provide opportunities for all children to meet the State's proficient or advanced levels of academic achievement;
 - c. Provide instruction by High Quality Staff
 - d. Create Strategies to Attract Qualified Teachers
 - e. Offer High-Quality, Ongoing Professional Development;
 - f. Create strategies to attract highly qualified teachers;
 - g. Develop Transition Strategies
 - h. Identify measures to include Teacher Participation in Making Assessment Decisions
 - i. Conduct activities to ensure students experience difficulty attaining proficiency receive effective, timely and additional assistance
 - j. Standards Develop plans to assist preschool students through the transition from early childhood programs to local elementary school programs;
 - k. Identify measures to include teachers in decisions regarding the use of academic assessments;
 - l. Conduct activities to ensure that students who experience difficulty attaining proficiency receive effective, timely, additional assistance; and
 - m. Coordinate and integrate Federal, State and Local Programs and Resources
 - n. Conduct an evaluation of the school-wide program
3. The school must evaluate annually the outcomes and the plan's implementation to determine whether the academic achievement of all students, and particularly of low-achieving students, improved, whether the goals and objectives contained in the plan were achieved, and if the plan is still appropriate as written. ***The evaluation of a school's ACIP is done within Cognia's eProve platform section titled, "Evaluation: Determine Impact of Critical Initiatives."***

Components of the Title I School-wide Diagnostic Program

1. Comprehensive Needs Assessment (Section 1114(b)(6))
2. School-wide Reform Strategies (Sec. 1114(7)(A)(i)(ii)(iii)(I)(II)(III))
3. Instruction by Qualified Staff (Sec. 1114(7)(A)(iii)(IV))
4. Strategies to Attract Qualified Teachers (Sec. 1114(7)(A)(iii)(IV))
5. High Quality and Ongoing Professional Development (Sec. 1114(7)(A)(iii)(IV))
6. Transition Strategies (Sec.1114(7)(A)(iii)(V))
7. Teacher Participation in Making Assessment Decisions (Sec.1114(b)(2))
8. Timely and Additional Assistance to Students Having Difficulty Mastering the Standards (Sec.1114 (7)(A))
9. Coordination and Integration of Federal, State and Local Programs and Resources (Sec.1114(b)(V))
10. Evaluation (Sec.1114(b)(3))

A comprehensive plan must address all of the components defined in the ESSA [Section 1114(b) of Title I of ESSA]. Each required component is described below, with an explanation of how each contributes to the creation of a successful school-wide program.

- ❖ Comprehensive Needs Assessment: Instructional strategies and initiatives in the comprehensive plan must be based on evidence-based research, strengthen the core academic program, increase the quality and quantity of learning time, and address the learning needs of all students in the school.
- ❖ School-wide Reform Strategies: Strategies in the school-wide plan which focus on helping ALL students reach the State’s standards, include evidence-based methods and interventions that increase the quality and quantity of instruction.
- ❖ Instruction by Qualified Staff: Teachers and other staff in school-wide program schools must be equipped to face the challenge of helping all students meet the State’s academic achievement standards. To do this, they must be familiar with the goals and objectives of the school-wide plan, and receive the sustained, high-quality professional development required to implement them. The statute requires that professional development be extended, as appropriate, to those who partner with teachers to support student achievement, such as principals, paraprofessionals, and parents.
- ❖ Strategies to Attract Qualified Teachers: Although recruiting and retaining highly qualified teachers is an on-going challenge in high poverty schools, low-performing students in

these schools have a special need for excellent teachers. Therefore, the school-wide plan must describe the strategies it will use to attract and retain highly qualified teachers.

- ❖ *High Quality and Ongoing Professional Development:* Professional development is “sustained and ongoing,” and is aligned with the comprehensive needs assessment process and the goals of the school improvement plan.
- ❖ *Transition Strategies:* This component emphasizes the value of creating a coherent and seamless educational program for at-risk students. Early childhood programs provide a foundation for later academic success, and effective school-wide programs capitalize on this strong start.
- ❖ *Teacher Participation in Making Assessment Decisions:* In addition to State assessment results, teachers need current and ongoing assessment data that describe student achievement. These data often come from less formal assessments, such as observation, performance assessments, or end-of-course tests. The school-wide program should provide teachers with professional development that increases their understanding of the appropriate uses of multiple assessment measures and how to use assessment results to improve instruction.
- ❖ *Timely and Additional Assistance to Students Having Difficulty Mastering the Standards:* Identified students who experience difficulty mastering the State’s academic achievement assessment standards at an advanced or proficient level, will be provided timely, effective, and additional assistance.
- ❖ *Coordination and Integration of Federal, State and Local Programs and Resources:* School-wide program schools are expected to use the flexibility available to them to integrate services and programs with the aim of upgrading the entire educational program and helping all students reach proficient and advanced levels of achievement. In addition to coordinating and integrating services, school-wide program schools may combine most Federal, State and local funds to provide those services. Exercising this option maximizes the impact of the resources available to carry out the school-wide program.
- ❖ *Evaluation:* The school evaluates the results achieved by the school-wide program using data from the State’s annual assessments and other indicators of academic achievement.

LEA Allowable Uses of Funds

See Title I School Allowable Expenditures PowerPoint Slides below:

Determining if a proposed purchase/activity/service is Allowable:

- Any purchases made with Title funds must meet the requirements and follow the guidelines for allowable costs (aligned with ESSA as detailed by EDGAR and other federal Non-Regulatory Guidance communications).
- **Requisitions** Reviewed
 - To assure purchase/activity/service is aligned to school's ACIP
 - Cost?
 - How will this be used? (Narrative helps to see the bigger picture of how students will directly benefit academically, etc.)
 - Included in budget line item?
 - Reasonable, necessary and evidence-based?
 - Documentation supports allowability?
 - Complies with accounting principles and federal rules, laws and regulations

THE RIGHT PEOPLE AT THE TABLE: Press Conference Briefing



School Allowable Use of Title I-A Funds

Engage...Educate...Empower

THE PURPOSE OF TITLE I-A

Title I Part A provides federal dollars for supplemental educational opportunities for children who are most at risk of failing to meet the State's challenging content and performance standards. Title I gives districts the opportunity to create two types of school-based programs: Schoolwide and Targeted Assistance.

BCS has a total of 7 Title I-A School-wide programs and zero Targeted Assistance programs.



Determining Title I Allowable Expenditures

(Intentional, Collaborative Process)

It's not always cut & dry, **conversations are critical**



Determining if a proposed purchase/activity/service is Allowable:

- Any purchases made w/Title funds must meet the requirements and follow the guidelines for allowable costs (aligned with ESSA as detailed by EDGAR & other federal Non-Regulatory Guidance communications)
- Is the expenditure necessary for the performance or administration of the grant?
- Are sound business practices followed?
- Is the object or service obtained at a fair marketplace?

Practical test of "reasonableness"

- Is the expense targeted to valid programmatic/administrative considerations?
- Do we have the capacity to use what is being purchased?
- **If asked to defend this purchase, would you be comfortable?**



Practical test for "necessary"

- Is this really needed?
- Is this the minimum amount needed to spend to effectively meet the need?

Title I, Part A Allowable Expenditures



Supports for Title I Students:

- Personnel (i.e. teachers, instructional paraprofessionals, counselors, APs, education specialist, graduation coaches, etc.)
- Counseling services, school-based mental health programs, specialized instructional support services, mentoring services, and other strategies to improve students' skills outside the academic subject areas
- MTSS, RTI, and credit recovery services
- Equitable services for private school students
- Pre-K, summer, and extended day programs
- Transportation for Title I-funded programs

Title I, Part A Allowable Expenditures



Support Staff for Title I Programs:

- Non-instructional paraprofessionals (non-instructional services)
- Secretary and/or clerks for Title I only
- Stipends for personnel outside of contract hours
- The cost of paying for substitutes (i.e. salaries/benefits or contractual services)
- Nurses, bus drivers, interventionists, etc. for summer and Title I programs

Title I, Part A Allowable Expenditures



Title I Program Supplies and Materials:

- Instructional materials for Title I programs
- Computers for student use
- Computer-aided instructional software for Title I programs
- Diagnostic and progress monitoring materials for Title I programs
- Title I data management software
- Technology to upgrade the educational program of a SWP
- SMART boards, projectors, and instructional websites
- Homeless student supplies
- Periodicals, online subscriptions, and software license fees

Title I, Part A Allowable Expenditures



Title I Parent and Family Engagement:

- Parent liaison
- Family engagement consultants
- Parent workshops and/or community fairs (monitoring student performance, skills training, child advocacy, etc.)
- Parenting conference with keynote speaker with breakout sessions for parents to choose
- Stipends for staff to plan for or participate in Title I activities outside contract hours
- Costs for activities including materials, transportation, and childcare
- Non-promotional pamphlets or brochures (for informing parents of assessments, school achievement, important dates, etc.)

Title I, Part A Allowable Expenditures



Professional Development aligned with Title I:

- Stipends and/or substitutes for staff
- PD aligned to a Schoolwide Program/ACIP or directly related to the needs of Title I students
- Educational consultants
- Reasonable supplies and materials for PD
- Travel costs to attend PD conferences (i.e. mileage, air fare, lodging, meals and/or per diem rates.

Title I, Part A Allowable Expenditures



Professional Development aligned with Title I:

- c. Title I Professional Development **[As defined under ESSA - 4.15 ESSA]**
- 4.15 ESSA Definition: (42) Professional Development
Section 8302 [20 USC 7802]
- The term "professional development" means activities that:
- (A) are an integral part of school and local educational agency strategies for providing educators (including teachers, principals, other school leaders, specialized instructional support personnel, paraprofessionals, and, as applicable, early childhood educators) with the knowledge and skills necessary to enable students to succeed in a well-rounded education and to meet the challenging State academic standards; and
- (B) are sustained (not stand-alone, 1-day, or short-term workshops), intensive, collaborative, job-embedded, data-driven, and classroom-focused, and may include activities that:
- (i) improve and increase teacher—
 - (I) knowledge of the academic subjects the teacher teaches;
 - (II) understanding of how students learn; and
 - (III) ability to analyze student work and achievement from multiple sources, including how to adjust instructional strategies, assessments, and materials based on such analysis;
 - (ii) are an integral part of local schoolwide and districtwide educational improvement plans;
 - (iii) allow personalized plans for each educator to address the educator's specific needs identified in observations or other feedback;
 - (iv) improve classroom management or other
 - (v) support the creation, bring, and training of effective teachers, including teachers who become certified through state and local alternative routes to certification;
 - (vi) advance teacher understanding of
 - (I) effective instructional strategies that are evidence-based; and
 - (II) strategies for improving student academic achievement or substantially increasing the knowledge and teaching skills of teachers;
 - (vii) are aligned with, and directly related to, academic goals of the school or local educational agency. (See 4.15 ESSA, Section 8302 [20 USC 7802] for definitions in its entirety)

Title I, Part A Allowable Expenditures



Other:

- Field trips aligned with academic content or to access humanities experiences
- Preparation for and awareness of opportunities for postsecondary education and the workforce.
- Advanced Placement, International Baccalaureate, dual or concurrent enrollment, or early college high schools for Title I students
- Student awards for effort and achievement (certificates), which are nominal and non-monetary
- Flyers (Title I activities)

Title I Non-Allowable Expenditures



- Non-certified personnel
- Athletic equipment
- Building maintenance, repairs, and supplies
- Construction
- Employee awards
- Field trips for recreational/entertainment purposes
- Fundraisers
- Gifts, gift certificates, congratulatory cards, etc.
- Venue rentals to support non-PD related activities
- Ceremonies, banquets, celebrations, and non-educational decorations/posters
- Televisions, home theater systems, PA systems, and any related accessories
- Yearbooks, school calendars, and school merchandise
- Food for parental/school involvement activities and meetings
- Appliances (microwaves, refrigerators, etc.)
- Gratuities, delivery charges, and tips
- Promotional items or merchandise (t-shirts, ball caps, clothing with school logos, etc.)
- Direct reimbursement to private, non-public schools



Allowable and Unallowable Title I Expenditures

All expenditures should be supplemental in nature and directly related to increasing the academic achievement of economically disadvantaged students in Title I schools.

Note: An allowable expenditure is not always reasonable or necessary. LEAs/schools should consider whether an expense is necessary to implement its Title I program.

The previous slides do not contain a comprehensive list of Title I allowable expenditures. Schools are encouraged to contact the federal programs department to **discuss if intended activities/resources are allowable to meet the needs of the school/students.**

Usage of Funds for School-wide Schools

A local educational agency may consolidate and use funds together with other Federal, State, and local funds in order to upgrade the entire educational program of a school that serves an eligible school attendance area in which not less than 40 percent of the children are from lowincome families, or not less than 40 percent of the children enrolled in the school are from such families. No school participating in a school-wide program shall be required to identify particular children under this part as eligible to participate in a school-wide program or to provide services that are supplementary, as otherwise required by section 1120A(b).

A school participating in a school-wide program shall use funds only to supplement the amount of funds that would, in the absence of funds under this part, be made available from non-Federal sources for the school, including funds needed to provide services that are required by law for children with disabilities and children with limited English proficiency.

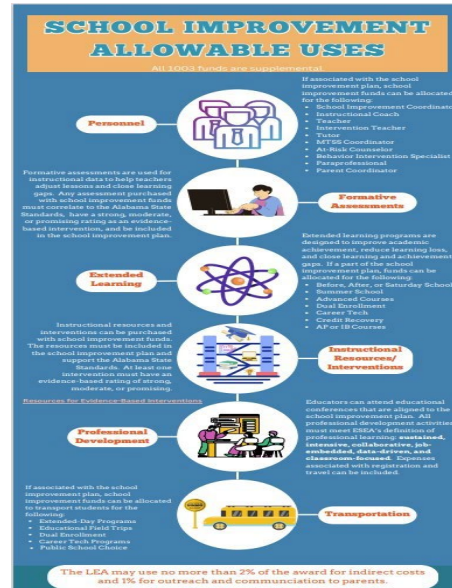
Title I, Part A of Uses of Funds in a School-wide Program (Based on the Needs Assessment)

- High-quality preschool or full-day kindergarten and services to facilitate the transition from early learning to elementary education programs.
- Recruitment and retention of effective teachers, particularly in high-need subjects.
- Instructional coaches to provide high-quality, school-based professional development.
- Increased learning time.
- Evidence-based strategies to accelerate the acquisition of content knowledge for English learners.
- Counseling, school-based mental health programs, mentoring services, and other strategies to improve students' nonacademic skills.
- Activities designed to increase access and prepare students for success in high-quality advanced coursework to earn postsecondary credit while in high school (e.g., Advanced Placement, International Baccalaureate, early college high schools, and dual or concurrent enrollment programs).
- Career and technical education programs to prepare students for postsecondary education and the workforce. Examples of Uses of Funds in a School-wide Program (Based on the Needs Assessment)
- Counseling, school-based mental health programs, mentoring services, and other strategies to improve students' nonacademic skills.
- School climate interventions (e.g., anti-bullying strategies, positive behavior interventions and supports).
- Equipment, materials, and training needed to compile and analyze student achievement data to monitor progress, alert the school to struggling students, and drive decision making.
 - Response-to-intervention strategies intended to allow for early identification of students with learning or behavioral needs and to provide a tiered response based on those needs.
 - Activities that have been shown to be effective at increasing family and community engagement in the school, including family literacy programs.
- Devices and software for students to access digital learning materials and collaborate with peers, and related training for educators (including accessible devices and software needed by students with disabilities).
- Two-generation approaches that consider the needs of both vulnerable children and parents, together, in the design and delivery of services and programs to support improved economic, educational, health, safety, and other outcomes that address the issues of intergenerational poverty.

Here are some of the ways that CSI funds may be used to support schools. These examples are not inclusive of all the ways CSI funds may be used. Dialogue should be had to determine creative

ways to spend the funds based on what the school(s) wants to accomplish in alignment with the school's ACIP.

- Purchase evidence-based programs to address achievement gaps in literacy and mathematics instruction for students.
- Purchase materials and supplies to support targeted small group instruction/intervention in reading and math.
- Provide opportunities for principals, teachers, and other school leaders to attend professional development that will impact their ability to meet a wide range of levels of student literacy/numeracy needs.
- Stipends to cover teachers and other school leaders who are attending targeted professional development.
- Hire consultants to provide prescriptive and targeted coaching and professional development activities for principals, teachers, and other school leaders.
- The purchase of tablets/computers to access assessment platforms and online instructional programming.
- Purchase annual subscriptions/licenses for literacy and mathematics software programs.
- Engage students in STEAM activities, both as grade-level activities and as personalized learning activities, to include STEAM materials.
- To ensure highly effective instruction, libraries may be updated to reflect engagement, diversity, and connectedness to the literacy curriculum that the school is utilizing.
- Hire personnel to address specific deficits or areas of concern (interventionists, coaches, PBIS coordinator, Dean of Students/Culture, etc.).
- Use of an early warning system to fidelity, to identify students at risk of dropping out of school, apply targeted interventions based on student needs, and track interventions over time to determine if the interventions are working.



SECTION 2:

Alabama Continuous Improvement Plan (ACIP)

Overview

ESSA requires that an eligible school operating a school-wide or targeted assistance program must develop a comprehensive plan that is designed with the involvement of teachers, principals, parents, etc. The plan is developed around a comprehensive needs assessment.

The plan should be implemented, regularly monitored, and revised as necessary. The plan is based on students' needs to ensure that students are provided opportunities to meet the challenging State academic standards. All school-level plans will be created and/or developed in the electronic system named eProve in the Cognia's platform. Chart 1.1 (see next page) provides guidance on the required ACIP components. Districts do not have to complete an ACIP in eProve.

Process

The federal programs coordinator or central office designee should ensure that all components of the ACIP are complete, including the applicable School-wide and Targeted Assistance Diagnostics, which are found in eProve Diagnostics and the school plan which is located in eProve Strategies.

- eProve Website: <https://myjourney.advanced.org/login>

It is the goal of BCS Federal Programs Team, in conjunction with the Curriculum and Instruction Team (e.g., School Improvement Specialist) to provide training, support, and guidance to schools in the development, implementation, and evaluation of school ACIPs. The ALSDE Office of School Improvement may have additional ACIP requirements for schools in Comprehensive Support and Improvement (CSI) or Targeted Support and Improvement (TSI) status.

The plans should be monitored, and evaluated throughout the year by school principals and their ACIP Teams. It is a working document that can be adjusted as needed. Schools should complete a thorough evaluation at the end of the year.

- Starting the Process:
 - **Have a strong ACIP Committee/Leadership Team in Place** ○ ACIP committee must include:
 - Teachers
 - Principals
 - Administrators
 - Other appropriate school staff
 - Students (secondary school)
 - Parents
 - Other appropriate Community Members

Federal Programs can view the plans at any time by logging into the eProve platform. As a reminder, schools must include **any** federal dollars that are being spent in their yearly plan. Funding should connect to an objective, critical initiative, or activity within the plan.

Writing the Plan within Cognia's eProve Strategies Platform

At this point in developing a schoolwide program, the planning team will have completed the needs assessment, analyzed results, identified priorities, created program goals, and selected strategies for activating those goals. All of these components come together in the writing of the comprehensive schoolwide plan. The comprehensive plan is designed to capture in writing a focused and coherent design to reform the entire school.

The planning team should also consider the following when assembling the comprehensive plan:

- ❖ **Does the school already have a comprehensive plan?** To maintain focus, eliminate duplication of effort, and promote comprehensiveness, schools should operate under a single plan if at all possible. A school that already has a functional and comprehensive plan for school improvement should build on it, rather than starting over, as long as the existing plan was based on a comprehensive needs assessment and can be revised to include the ten required school-wide components. No specific format is required. If an LEA or SEA requires a specific plan format, then the information required for the schoolwide plan should be incorporated into it.

Note: The Alabama Department of Education requires all schools/districts utilize Cognia's eProve Strategies to format school-wide plans (ACIP).

- ❖ **How will the budget support the plan?** The school-wide plan should contain a budget that identifies all of the resources that will be available to implement the school-wide program. In the spirit of Title I school-wide programs, the budget should reflect the commitment the staff has made to using all available resources, as allowed, to improve the achievement of all students.
- ❖ **How will this plan accommodate changes over time?** Once written, the school-wide plan remains in effect as long as the school chooses to be a school-wide program. However, creators of the original school-wide plan should acknowledge from the beginning that the school-wide plan will evolve and grow over time as changes occur inside and outside of the school. A school must review and revise its plan as necessary, evaluating it at least annually. These activities are likely to result in modifications that address changing student needs, new instructional approaches, or modifications in the State's standards, assessments, or accountability system.
- ❖ **Who will monitor the implementation of the plan?** A school has flexibility in how it monitors the operation of the school-wide program, but generally, a school team consisting of the principal, teachers, parents, external technical assistance providers, and

other representatives from the school and community is given this responsibility. Representatives of programs from which funds have been consolidated should also be included on the team. Each member of the team should be knowledgeable about the purpose of school-wide programs, the required components, and the contents of the school plan.

Additional Resources

Principals and leadership teams can view the Federal Programs ACIP presentations to revisit district common themes, objectives, and other important points for developing critical initiatives and activities that support the district’s Curriculum and Instructional expectations for all schools.

Supporting Links:

BCS 2025 Summer ACIP Development Boot Camp (PowerPoint)

<https://docs.google.com/presentation/d/1Nx6LM2VSRyXH5MNXFJQ3d7GtJA-HDUvt/edit?usp=sharing&oid=104977358397556612090&rtpof=true&sd=true>

CSI ACIP 2025 Summer Training Work Session

<https://docs.google.com/presentation/d/1VTpukkrT4il1-qGHvNpUa4o3W5nJoFRc/edit?usp=sharing&oid=104977358397556612090&rtpof=true&sd=true>

BCS FY26 All Things Title I Training (PowerPoint)

https://docs.google.com/presentation/d/1-ern6F6e6Foz9-yY10TGnWsxBQvcoiK_/edit?usp=sharing&oid=104977358397556612090&rtpof=true&sd=true




Chart 1.1: ACIP Checklists

Title I Schools ACIP Checklist	Non-Title Schools ACIP Checklist
_____ Administer Title I Parent Surveys (Spring or Fall)	_____ Administer Parent Surveys (Spring or Fall)
_____ Administer Staff and Student Surveys (Spring or Fall)	_____ Administer Staff and Student Surveys (Spring or Fall)
_____ Complete the applicable Title I Diagnostic (Schoolwide or Targeted Assistance)	_____ Complete plan in eProve Strategies
_____ Complete plan in eProve Strategies	

Chart 1.2: Additional Website Resources

- https://padlet.com/andrel_harrison1970/StrategicThinkingResourcesAlabamaSchools
- <https://alsde.onlinehelp.cognia.org/>
- <https://extranet.cognia.org/extranet> (use eProve password and username to log-in)

Chart 1.3: Guidance on required ACIP Components

		
<p>Data from survey results assist with developing a school's needs assessment.</p>	<p>The Title I Diagnostic can be found under the ALSDE Content Tab in eProve Diagnostics. The Title I Diagnostic is for Title I Schools ONLY.</p>	<p>Both Title I and Non-Title Schools and must complete an ACIP in eProve Strategies.</p>
<p>Parent Surveys</p> <ul style="list-style-type: none"> • Title I Schools must use the required Title I Parent Survey that can be found under the ALSDE Content Tab in both English and Spanish • Non-Title Schools may use any parent survey/inventory found under the AdvancED/Cognia Certified Content Tab or utilize another survey of their choice. 	<p>Title I Schools Only</p> <ul style="list-style-type: none"> • Schoolwide or Targeted Assistance Title I Comprehensive Needs Assessment 	<p>Title I Schools and Non-Title Schools</p> <ul style="list-style-type: none"> • This is an annual plan that contains strategic themes, objectives, critical initiatives, activities, financial resources, etc.
<p>Teacher Surveys or Inventories Title I Schools and Non-Title Schools</p> <ul style="list-style-type: none"> • Schools may use any teacher survey/inventory found under the AdvancED/Cognia Certified Content Tab or utilize another survey of their choice. 	<p>Title I Schools Only</p> <ul style="list-style-type: none"> • School-wide or Targeted Assistance Title I ACIP Assurances 	<p>Title I Schools and Non-Title Schools</p> <ul style="list-style-type: none"> • The <i>Annual Implementation Plan</i> within eProve Strategies will function as your school's yearly ACIP.

<p>Student Surveys or Inventories Title I Schools and Non-Title Schools</p> <ul style="list-style-type: none"> Schools may use any student survey/inventory found under the AdvancED/Cognia Certified Content Tab or utilize another survey of their choice. 	<p>Title I Schools Only</p> <ul style="list-style-type: none"> School-wide or Targeted Assistance Title I Parent and Family Engagement Plan 	<p>Title I Schools and Non-Title Schools</p> <ul style="list-style-type: none"> If a Title I School, be sure to include all federal dollars used in the financial resources section of the plan.
	<p>Title I Schools Only</p> <ul style="list-style-type: none"> Schoolwide or Targeted Assistance Title I Coordination of Resources- Comprehensive Budget 	

SECTION 3:

The Purpose of Title II, Part A – Supporting Effective Instruction

Overview of Title II, Part A

Title II, Part A Improving Educator Quality State Grants originally authorized as Eisenhower Professional Development and the Class Size Reduction programs under the Elementary and Secondary Education Act (ESEA) of 1965, was reauthorized in 2001 by the No Child Left Behind Act (NCLB) and in 2015 by the Every Student Succeeds Act (ESSA). While ESEA/ESSA was authorized in December of 2015, the Consolidated Appropriations Act of 2016 extended the date by which certain parts of the Act would be effective. Further guidance has been provided by ED in the form of Dear Colleague Letters and FAQs. In 2012, ED allowed SEAs to submit Flexibility Waivers. Per these FAQs, all flexibility requests are null and void as of August 1, 2016.

Improving Teacher Quality State Grant funds are obtained by a State on the basis of the United States Department of Education’s (ED) approval of either (1) an individual State plan as provided in ESEA/NCLB Sec. 2112 (20 USC §2112) or (2) a consolidated application that includes the program, in accordance with ESEA/NCLB Sec. 9302 (20 USC §7842). Through the program, state

and local educational agencies (SEAs and LEAs) receive funds using a ED provided formula based on poverty and population. This formula will be adjusted annually from July 2017 – July 2021.

Purpose (SEC. 2001)

The purpose of the Title II, Part A grant is to:

- Increase student achievement consistent with challenging State academic standards,
- Improve the quality and effectiveness of teachers, principals and other school leaders,
 - Increase the number of teachers, principals and other school leaders who are effective in improving student academic achievement in schools, and
- Provide low-income and minority students greater access to effective teachers, principals and other school leaders.

LEA Authorized Use of Funds

Has the LEA prioritized funds to schools served by the agency that are implementing:

- a) comprehensive support and improvement activities under Section 1111?
- b) targeted support and improvement activities under Section 1111?
- c) and schools that have the highest percentages of students in poverty under Section 1111(d)?

TYPES OF ACTIVITIES: (Sec. 2103(b)) **Evaluation and Support Systems (Sec. 2103(b)(3)(A))**

LEAs may use Title II funds in developing or improving a rigorous, transparent, and fair **evaluation and support system** for teachers, principals, or other school leaders

- 1) based in part on evidence of student achievement, which may include student growth
- 2) include multiple measures of performance
- 3) provide clear, timely, and useful feedback

Recruiting, Hiring, and Retaining Effective Teachers (Sec. 2103(b)(3)(B))

LEAs may use Title II funds to develop and implement initiatives to recruit, hire, and retain effective teachers, particularly in low-income schools with high percentages of ineffective teachers and high percentages of students who do not meet state standards.

Initiatives may provide:

- Expert help in screening candidates and enabling early hiring
- Differential and incentive pay for teachers, principals, or other school leaders in highneed academic subject areas and specialty areas, which may include performance-based pay systems

- Teacher, paraprofessional, principal, or other school leader advancement and professional growth, and an emphasis on leadership opportunities, multiple career paths, and pay differentiation
- New teacher, principal, or other school leader induction and mentoring programs • The development and provision of training for school leaders, coaches, mentors, and evaluators on how accurately to differentiate performance, provide useful feedback, and use evaluation results to inform decision making about professional development, improvement strategies, and personnel decisions
- A system for auditing the quality of evaluation and support systems

Recruiting from Other Fields (Sec. 2103(b)(3)(C))

LEAs may use Title II funds to recruit qualified individuals from other fields to become teachers, principals, or other school leaders. Qualified individuals from other fields include mid-career professionals from other occupations, former military personnel, and recent graduates of institutions of higher education with records of academic distinction who demonstrate the potential to become effective teachers, principals or other school leaders.

Class Size Reduction (Sec. 2103(b)(3)(D))

LEAs may use Title II funds to reduce class size to a level that is **evidenced-based**, to the extent the SEA (in consultation with LEAs) determines such evidence is reasonably available. LEAs may consider reducing class size as one strategy to attract and retain effective educators in high need schools.

- Class size reduction teachers should be supplemental and not the only teacher in that grade or subject
- Document the need and research-based evidence to show that the teachers are hired to reduce the class size to address the identified need
- Teachers cannot be hired with Title II, Part A funds so that the district can use the funds for another purpose

Personalized Professional Development (Sec. 2103(b)(3)(E))

Title II funds can be used to provide high-quality, personalized professional development for **teachers, instructional leadership teams, principals, and other school leaders**. The professional development must be evidence-based and focus on improving teaching and student learning and achievement, including supporting efforts to train teachers, principals, or other school leaders to:

- Effectively integrate technology into curricula and instruction
- Use data to improve student achievement and understand how to ensure individual student privacy is protected

- Effectively engage parents, families, and community partners, and coordinate services between school and community
- Help all students develop the skills essential for learning readiness and academic success
- Develop policy with school, LEA, community, or state leaders
- Participate in opportunities for experiential learning through observation

Increasing Teacher Effectiveness for Students with Disabilities and English Learners

(Sec. 2103(b)(3)(F))

Title II funds can be used to develop programs and activities that increase teachers' ability to effectively teach children with disabilities and English learners, which may include the use of multi-tiered system of support such as the Positive Behavioral Intervention and Supports (PBIS).

Supporting Early Education (Sec. 2103(b)(3)(G))

Title II funds can be used to provide programs and activities to increase the knowledge base of teachers, principals, or other school leaders on instruction in the early grades and on strategies to measure whether young children are progressing.

Supporting Effective Use of Assessments (Sec. 2103(b)(3)(H))

Title II funds can be used to provide training, technical assistance, and capacity-building to assist teachers, principals, or other school leaders with selecting and implementing formative assessments, designing classroom-based assessments, and using data from such assessments to improve instruction and student academic achievement, which may include providing additional time for teachers to review student data and respond, as appropriate.

Supporting Awareness and Treatment of Trauma and Mental Illness, and School Conditions for Student Learning (Sec. 2103(b)(3)(I))

Title II funds can be used:

- To carry out in-service training for school personnel in the techniques and supports needed to help educators understand when and how to refer students affected by trauma, and children with, or at risk of, mental illness
- As a referral mechanisms that effectively link such children to appropriate treatment and intervention services in the school and in the community
- To form partnerships between school-based mental health programs and public or private mental health organizations
- To address issues related to school conditions for student learning, such as safety, peer interaction, drug and alcohol abuse, and chronic absenteeism

Supporting Gifted and Talented Students (Sec. 2103(b)(3)(J))

Title II funds can be used to provide training to support the identification of students who are gifted and talented, including high-ability students who have not been formally identified for gifted education services, and implementing instructional practices that support the education of such students, such as early entrance to kindergarten, enrichment, acceleration, and curriculum compacting activities, and dual or concurrent enrollment programs in secondary school and postsecondary education.

School Library Programs (Sec. 2103(b)(3)(K))

Title II funds can be used to support the instructional services provided by effective school library programs.

Preventing and Recognizing Child Sexual Abuse (Sec. 2103(b)(3)(L))

Title II funds can be used to provide training for all school personnel, including teachers, principals, other school leaders, specialized instructional support personnel, and paraprofessionals, regarding how to prevent and recognize child sexual abuse.

Supporting Science, Technology, Engineering, and Mathematics (STEM) (Sec. 2103(b)(3)(M))

Title II funds can be used to develop and provide professional development and other comprehensive systems of support for teachers, principals, or other school leaders to promote high-quality instruction and instructional leadership in science, technology, engineering, and mathematics subjects, including computer science.

Feedback Mechanisms to Improve School Working Conditions (Sec. 2103(b)(3)(N)) Title II funds can be used to develop feedback mechanisms to improve school working conditions. This can include periodically and publicly reporting feedback on educator support and working conditions.

Supporting Postsecondary and Workforce Readiness (Sec. 2103(b)(3)(O))

Title II funds can be utilized to provide high quality professional development for teachers, principals, or other school leaders on effective strategies to integrate rigorous academic content, career and technical education, and work-based learning which may include providing common planning time, to help prepare students for postsecondary education and the workforce.

Evaluation

- What is the program evaluation plan?

- Are the activities identified in the needs assessment?
- Are the activities aligned with challenging state standards?
- What are reasonable expectations of success and how can success be measured?
- Did teacher effectiveness increase?
- Did academic achievement improve?
- How will data and ongoing consultation be used to update and improve activities?

What is an “Evidence-Based” Intervention? (Sec. 8101(21)(A))

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

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

Professional Development (Sec. 8101(42(A)(B)))

Professional Development means activities that are an integral part of school and local educational agency strategies for providing educators (including teachers, principals, other school leaders, specialized instructional support personnel, paraprofessionals, and as applicable, early childhood educators) with the knowledge and skills necessary to enable students to succeed in a **well-rounded education** and to meet the challenging State academic standards.

Well-Rounded Education

- English, reading or language arts, writing
- Science, technology, engineering, mathematics
- Computer science, career and technical education
- Foreign languages
- Civics, government, economics, history, geography

- Arts, music
- Health and physical education

Activities that are:

- Sustained (not stand-alone, 1-day, or short term workshops), intensive, collaborative, job-embedded, data-driven, and classroom focused;
- Available to all school staff, including paraprofessionals;
- Inclusive of teachers of all subjects;
- Developed with educator input; and

Regularly evaluated

Teacher and Paraprofessional Qualifications (Sec. 1111(g)(2)(J)(M))

The State educational agency will ensure that all teachers and paraprofessionals working in a program supported with funds under this part meet applicable State certification and licensure requirements, including any requirements for certification obtained through alternative routes to certification.

The State has professional standards for paraprofessionals working in a program supported with funds under this part, including qualifications that were in place on the day before the date of enactment of the Every Student Succeeds Act.

In order to be employed as an **Instructional** Paraprofessional, an individual must obtain a secondary school diploma or its recognized equivalent and **one** of the following qualifications: •

Successful completion of at least two years (48 semester hours or 60 quarter hours) of study at an institution of higher education, or

- An Associate’s Degree documented on an official transcript from an accredited institution of higher education, or
- Met a rigorous standard of quality and can demonstrate, through a formal state or local academic assessment, knowledge of, and the ability to assist in, instructing reading, writing, and mathematics.

In 2004, the Alabama State Department of Education approved the *WorkKeys Assessment* to meet the requirement outlined in bullet 3 above. Currently, the requirements are a minimum of Level 3 scores on the following tests: Applied Math, Work Place Documents, and Business Writing.

SECTION 4:

BCS Federal Programs Requisition Process, Forms & Other Title I Information/Resources

Federal Programs Requisition Form

Federal Programs Budget Spending Narrative Form

Title I schools are to utilize **the Federal Programs Budget Spending Narrative Form** when submitting requests to use federal funds. The following Requisition form will be used to **help determine if a proposed purchase/activity/service is Allowable:**

- Any purchases made with Title funds must meet the requirements and follow the guidelines for allowable costs (aligned with ESSA as detailed by EDGAR and other federal Non-Regulatory Guidance communications).
- **Requisitions** Reviewed
 - To assure purchase/activity/service is aligned to school's ACIP
 - Cost?
 - How will this be used? (Narrative helps to see the bigger picture of how students will directly benefit academically, etc.)
 - Included in budget line item? ○ Reasonable, necessary and evidence-based? ○ Documentation supports allowability?
 - Complies with accounting principles and federal rules, laws and regulations

BCS Federal Programs Website

- To access documents you may go to <https://www.bessk12.org/federalprograms>

Federal Purchases

Platform: NextGen

Who Completes This Task: Financial Secretary/Clerical Support with direction from a Principal/Administrator

Process/Steps:


Any expenditure with federal funds must be **PRE-APPROVED** before services are rendered. To request the use of federal funds, all entries must be generated in NextGen to generate a purchase requisition.

1. Submit the purchase requisition electronically using NextGen
2. Attachments should be uploaded to the requisition
3. Approval will be sought by all levels in the routing approval process
4. Monitor the process to prevent delays if this is time sensitive

5. The authorized person (principal/supervisor) goes into their queue and approves the requisition. Until the requisition is approved at the school level, the routing approval process cannot proceed.
6. After the requisition has been approved by the principal, the requisition is routed to the next authorized department/person(s):
 - a. Federal Programs; Technology (technology purchases); CSFO and/or Assistant CSFO; Purchasing & Accounts Payable for final approval.
 - b. Upon approval in NextGen, a purchase order (PO) will be issued

Required Documentation

- Federal Programs Budget Spending Narrative Form is needed for ALL federal purchases
- Quote, shopping cart (including shipping & handling) and/or a board approved contract.
- All contracts must be board approved and signed by all required parties prior to being attached for all contractual services.
- Approved field trip forms from the Superintendent and/or Designee
- All forms attached must be completed entirely and signed by all required parties.



Federal Programs Expenditure Form

This Expenditure Form helps to see the bigger picture of how students will directly benefit academically, etc. while providing proper documentation for federal programs auditing purposes.

***Please complete and upload this document as an attachment with ALL Federal Programs Requisitions**

Please select: Title I Title II Title III Title IV School Improvement

Date: _____ Amount: _____ Activity Type: _____

School/Department: _____ Requested by: _____

Vendor: _____ Vendor Phone #: _____

Vendor Address: _____

1) Provide a description of how funds will be used and where resources/items will be located:

2) Is this a field trip? YES *(Please upload board approval and Field Trip Packet with requisition)* NO
 Cost for Students _____ Cost for Buses _____ Other _____
 Field Trip Timeline (expected start and end times if applicable): _____

3) Please specify each of the following for this purchase. **(Title I only)**
 ACIP Critical Initiative: _____
 ACIP Activity: _____

This Section To Be Completed By School Principal and/or Financial Secretary

Which General Ledger (GL) number will be used to request funding? Please refer to your Title Budget and/or the Budget Analysis Reports.

Fund Type	Account Type	Account Code	Object Code	Cost Center	Fund Source	Approp Year	Program Code	Special Use
xx	x	xxxx	xxx	xxxx	xxxx	x	xxxx	xxxx

Is there funding allocated to support this GL Number? YES NO

What will the balance be for this GL Number after this request? _____

Principal Signature _____ Date _____

SECTION 5:

Other Federal Programs and Fiscal Requirements

Supplement, Not Supplant (SNS)

Title I, Part A Requirements

General Information

A State education agency or local education agency shall use Federal funds received under [Title I, Part A] only to supplement the funds that would, in the absence of such Federal funds, be made available from State and local sources for the education of students participating in programs assisted under [Title I, Part A], and not to supplant such funds.

ESEA Section 1118(b)(1)

- An LEA receiving Title I, Part A funds must continue to use its Title I, Part A funds only to supplement, and not supplant, the funds that would be made available from State and local sources in the absence of such Federal funds.

Other Federal Programs

Title I, Part C – Migrant Children Education

Funds provided under [Title I, Part C] shall be used to address the [supplemental] needs of migratory children that are not addressed by services available from other Federal or non-Federal programs, except those migratory children who are eligible to receive services under [Title I, Part A] may receive those services through funds provided under [Title I, Part A], or through funds under [Title I, Part C] that remain after the agency addresses the needs described in [the comprehensive plan].

Section 1306(b)(2)

Title I, Part D – Neglected and Delinquent Children Programs

A program under this subpart that supplements the number of hours of instruction students receive from State and local sources shall be considered to comply with the supplement, not supplant requirement of section 1118 (as applied to this part) without regard to the subject areas in which instruction is given during those hours.

Section 1415(b)

Title II, Part A – Supporting Effective Instruction

Funds made available under this title shall be used to supplement, and not supplant, nonFederal funds that would otherwise be used for activities authorized under this title.

Section 2301

Title III, Part A – Language Instruction for English Learners & Immigrant Students

Federal funds made available under this subpart shall be used so as to supplement the level of Federal, State, and local public funds that, in the absence of such availability, would have been expended for programs for English learners and immigrant children and youth and in no case to supplant such Federal, State, and local public funds.

Section 3115(g)

Title IV, Part B – 21st Century Community Learning Centers

Each application submitted under paragraph (1) shall include an assurance that subgrant funds under this part will be used to increase the level of State, local, and other non-Federal funds that would, in the absence of funds under this part, be made available for programs and activities authorized under this part, and in no case supplant Federal, State, local, or nonFederal funds.

Section 4204(b)(2)(G) **Title V, Part B – Rural Education Achievement Program**

Funds made available under subpart 1 or subpart 2 shall be used to supplement, and not supplant, any other Federal, State, or local education funds.

Section 5232 **Title IX, Part A – McKinney-Vento Homeless Assistance Act**

Services under paragraph (1) – shall be designed to expand or improve services provided as part of a school's regular academic program, but not to replace such services provided under such program.

42 U.S. Code §114433(a)(2)(A)(iii)

Time and Effort

An employee whose salary and wages are supported, in whole or in part, with Federal funds is required to document their time spent working on Federal programs. The submitted documentation is used to ensure that charges reflect an accurate account of the employee's time and effort devoted to each Federal program. (Appendix B of 2 C.F.R. Part 225 (formerly OMB Circular A-87, *Cost Principles for State, Local, and Indian Tribal Governments*))

There are two types of documentation that are used to show time and effort in Alabama:

- 100% Certifications
- Personnel Activity Reports (PAR)

100% Certifications

For employees who work solely on a single Federal award or cost objective, a periodic certification is required. These certifications must be prepared at least semi-annually and signed by the employee and supervisory official who has firsthand knowledge of the work performed after the last day on the semi-annual certification.

Personnel Activity Report (PAR)

For employees who work on multiple activities or cost objectives, a Personnel Activity Report (PAR) is required.

SECTION 6:

Federal Programs Monitoring

Definition and Purpose of Monitoring

Monitoring is the regular and systematic examination of an LEA's administration and implementation of the Federal education grant, contract, or cooperative agreement administered by the United States Department of Education (ED) through the Alabama State Department of Education (ALSDE). Monitoring assesses the extent to which States provide leadership and guidance for local education agencies (LEAs) and schools in implanting policies and procedures that comply with statutes and regulations. ED requires the ALSDE to monitor LEA implementation of Federal education grants.

ALSDE Federal Programs 2024 Compliance Monitoring PowerPoint Presentation

<https://drive.google.com/file/d/1OxBNosUHPI4cGXeaDPd5LHsNMvugPIFk/view?usp=sharing>

LEA Self-Assessment

The LEA will complete an annual self-assessment. The Self-Assessment will serve as a catalyst for the LEA program review and provide the opportunity for the LEA to request specific technical assistance from the ALSDE. The ALSDE will compile identified needs for the purpose of planning local, regional, and state training sessions to address identified needs.

ALSDE Desk Reviews

The ALSDE Desk Review will examine evidence that demonstrates the LEA focuses federal funds on programs, services, materials, and other support to ensure that all students particularly those who are among the targeted subgroups - economically disadvantaged, major racial/ethnic groups, English Learners, migrant, students with disabilities - reach proficient and advanced levels on the state's assessments.

- Evidence will be gathered through the approval process for eGAP applications.
- LEA Expenditure Reports and eGAP budgets will be reviewed to ensure that the LEA systematically coordinates the use of the separate sources of federal funds with state and

local funds and to verify funds were spent according to approved budgets and to supplement and not supplant state and local funds.

Onsite Reviews

School districts will be scheduled for an onsite review based on a combination of a five-year cycle and risk assessment. The Federal Programs Section of the Alabama State Department of Education On-Site Compliance Review Manual and eProve will be used to document review findings.

- Each local education agency is encouraged to contact their regional specialist for assistance in preparing for an onsite review.

ALSDE Federal Programs Comprehensive Monitoring Visit Protocol

Pre-Monitoring Activities	Onsite Visit	Post-Visit/Corrective Action Support
<p>Technical Assistance</p> <p>Onsite per request by LEA 2 to 3 months prior to a scheduled monitoring visit</p>	<p>Some of the activities that will take place during an Onsite Visit include: •</p> <p style="padding-left: 40px;">Entrance Conference</p> <ul style="list-style-type: none"> • School Visits • Parent Interviews 	<p>No Findings Found</p> <p>The monitoring visit process is completed for the Federal Programs Section</p>

<p style="text-align: center;">Document Request Email</p> <p>Some of the items that will be requested include:</p> <ul style="list-style-type: none"> • Budget Analysis Report by Cost Center (YTD) • List of New Hire Teachers • Gross Employee Salary Report by Cost Center (Current Year) • Teachers paid with Federal Funds • List of all instructional paraprofessionals in Title I schools • LEA Planning Template • List of schools with high EL populations and number of EL students 	<ul style="list-style-type: none"> • Program Coordinator Interviews • Exit Conference with Federal Programs Coordinator and other staff as desired by the District <p>NOTE: The onsite visit may last from 1 to 3 days, depending on evidence revealed through the desk review, interviews, school visits, and whether the District has submitted all requested information in a timely manner.</p>	<p style="text-align: center;">Findings Found</p> <p>The Program Coordinator will be guided through the Corrective Action Process by the Monitoring Team Leader.</p> <p>Here is a brief summary of the process:</p> <ol style="list-style-type: none"> 1. Findings, follow actions and timeline explained on site 2. Technical Assistance related to follow-up actions or documents required to clear the findings explained with a timeline for submission in eProve as requested or needed by District 3. Monitoring Team Leader directs/reviews/approves documentation submitted in eProve or via email
<p style="text-align: center;">Desk Review</p> <p>Review documentation submitted in eProve</p>		

Preparing for Onsite Review

ALSDE Responsibilities	LEA Responsibilities
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Unless otherwise noted, all references to ESSA in this document refer to the Elementary and Secondary Act of 1965 (ESEA), as amended by Every Student Succeeds Act (ESSA) of 2015.

- Contact LEA Federal Programs Coordinator at least two weeks prior to the onsite/desk review
- Provide a planning template for scheduling school visits
- Identify schools that will be visited
- Inform the Federal Programs Coordinator of expectations and process for the school visits

District Level:

- Review the onsite monitoring document
- Contact your ALSDE Specialist to provide technical assistance (if needed)
- Review the Required Documents List provided by ALSDE
- Collaborate with all central office staff responsible for reports, personnel, inventory, and fiscal issues
- LEA Federal Programs Coordinator notifies the schools selected for visits and explains the school visit process to the staff
- Organize all supporting documents that confirm meetings, work sessions, parent notifications, and collaboration so that they are easily accessible (sign-in sheets, agendas, working notes, emails, etc.)

School Level:

- School teams should include the Principal, ACIP members and others that are designated by the principal
- School principals are responsible for having teams assembled at scheduled times
- Encourage all the school team members to be comfortable with sharing the ACIP revision process and the wonderful things that are going on in their schools

Federal Programs Compliance Monitoring Q&A

1. How often do you conduct a compliance monitoring onsite visit of a school system?

- A compliance monitoring onsite visit will be conducted on school systems determined by the ALSDE Risk Assessment this is performed on every school system in the spring of each year.
2. When is the schedule set for each school system for a compliance monitoring onsite visit?
 - The schedule will be set in June of each year.
 3. How long does it take to conduct a compliance monitoring onsite visit?
 - Depending on the size of the school system, most visits last 2 to 3 days.
 4. How many staff members from the ALSDE will be conducting the on-site visit?
 - It varies depending on the size of the school system.
 5. What happens when the school system is out of compliance?
 - The school system will need to create a Corrective Action Plan (CAP) in order to bring the school system into compliance.
 6. How much time does a school system have to complete the Corrective Action Plan?
 - Each school system has 60 days from the date of the exit conference (last day of the onsite visit) to have all findings corrected and documentation submitted to the ALSDE as evidence.
 7. Can a school system ask for assistance from Federal Programs before the review?
 - Yes, we encourage school systems to do so. A Technical Assistance form can be downloaded from the Compliance Monitoring section of the ALSDE website.
 8. Can we correct items when the compliance monitoring onsite visit is in process and have the findings removed from the report and taken off the CAP?
 - You may correct the findings, but they will be marked as a finding and listed as corrected onsite.
 9. When does the school system receive the report?
 - The report is sent electronically to the school system at the end of the compliance onsite monitoring visit.
 10. How can I find out when my school will be reviewed again?
 - In the spring of each year, the ALSDE Risk Assessment will determine which school systems will be monitored, and a schedule will be available in June of each year.
 11. What resources are available prior to or during the onsite monitoring visit?
 - Staff Assignments for Onsite Document Review and Site Visits
 - Parent Interview Information and Questions
 - School Visitation Interview Questions (Served and Non-Served)
 - Private School Visitation Interview Questions (if served)
 - Sample Email with Information
 - Evidence of Implementation and Compliance Supplement

○ LEA Onsite Visit Planning Template

All these resources are available by request and during the MEGA Federal Program Coordinator training.

Federal Programs Common Citations/Findings at LEA Compliance Monitoring

- Enrollment Procedures
- Evidence that the LEA developed a high-quality age-appropriate English language instructional education program(s), which are evidence-based and designed to meet the needs of EL children, including immigrant children and youth
- Teacher Units (Can be a Supplement/Supplant issue)
- Expenditures (Can be a Supplement/Supplant issue) • Certified Teachers

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- Time and Effort/100% Certification
- Inventories
- Evaluations
- EL Core Acquisition Program Evaluation
- English Learners (EL)
- Board Policies that deal with Immigrant, Migrant, Homeless, Foster Care and EL students
- Homeless Program
- Private Schools
- No evaluation of the Title III program
- LEA has not ensured that all core academic subject teachers who teach in a school-wide program were certified and teaching in-field at the time they were hired
- LEA does not have a procedure that allows parents/guardians to waive Title III supplemental English language instruction educational services
- LEA has not provided high-quality professional development to teachers who provide English language development or access to the core curriculum
- LEA has not developed high-quality age-appropriate English language instruction educational programs that are scientifically research-based and designed to meet the needs of EL children
- LEA does not have a formal plan for disseminating information about programs for homeless children and youth
- School leadership team could not describe the core curriculum used for ELs and did not receive adequate professional development
- Documentation does not support consultation with an appropriate representative for determining LEA set-asides
- Documentation revealed that the LEA violated supplement not supplant by purchasing classroom furniture
- There is no evidence parent notification was provided for students being taught by a certified teacher teaching out-of-field
- Timely consultation with the non-public school was not provided to ensure the inclusion of non-public school participation in eGAP
- Evidence for determining equitable services to non-public schools by the LEA was not provided
- School-Parent Compacts are not being utilized correctly
- School-Parent Compacts are missing signatures
- School personnel are not sure of the purchase for the School-Parent Compact
- LEA does not have the required evaluation for each Electronic Continuous Improvement Plan for school-wide schools

-
- State earned foundation units were not placed appropriately prior to Title I funded staff being placed in Title I schools
- Evidence revealed that the school’s annual meeting of Title I parents did not inform parents of Title I requirements and their right to be involved
- School-Parent Compacts did not include the six required components under School Responsibility
 - No evidence that the LEA makes private school officials aware of the procedure to file a complaint to the ALSDE regarding timely and meaningful consultation
- LEA does not have a formal plan for disseminating information about programs for homeless children and youth
- No evidence that the LEA conducts an annual evaluation of the effectiveness of programs for homeless children and youth
- No evidence that the LEA conducted or sponsored professional development for the school/LEA personnel in order to heighten awareness of the problems and needs of homeless children
- Incorrect procedures are in place in regards to a struggling EL student during the two year monitoring time frame
- Evidence revealed that not all teachers in Title I SW schools are certified
- The district could not provide evidence of a dispute resolution policy for homeless education
- LEA has not ensured that all core academic subject teachers who teach in a Title I SW program were certified at the time they were hired
- LEA has not been able to systematically communicate the English Learner Policy to all school and LEA personnel, specifically the vocabulary related to procedures surrounding the exit criteria or monitoring after exiting
- LEA has not systematically provided professional development to all school and LEA personnel related to WIDA Standards and defining a core curriculum for ELs
- LEA has not ensured that Federal funds under Title I, Part A are only to supplement the funds that would in the absence of such Federal funds be made available from nonFederal sources, and not to supplant such funds
- Time and Effort is not maintained correctly for all employees paid with federal funds
- All teachers whose salaries are paid with Title II funds are not fully certified to teach in the areas to which they have been assigned
- No evidence that a Core ESL program was in place or evaluated
- Insufficient documentation that the 21st CCLC program is being implemented according to the approved application
- Board approved policy of admitting students does not include a statement including immigrant status

-
- No evidence to verify the evaluation of the Core ESL program
- Parent Interview responses did not support that the LEA Parent and Family Engagement Plan was developed jointly with, agreed on, and distributed to parents
- LEA did not make private school officials aware of the procedure to file a complaint to the ALSDE regarding timely and meaningful consultation in the initial letter sent to private schools
- LEA procedure for waiving EL services should only allow waiving Title III supplemental services
- Documentation and staff interviews did not support that effective professional development has been provided for policies, procedures, and the Core EL program ACIP budget pages do not reflect the correct amounts allocated to the schools according to eGAP and MacAleer budget analysis reports
- Instructional aides being paid with Title I funds were functioning as special education aides
- LEA has not maintained 100% certification documentation for teacher paid with Title II funds
- Non-certified teachers or teachers teaching out-of-field in Title I schoolwide schools
- LEA expenditures for personnel do not match the approved application
- No evidence that the district has a process for inventorying equipment purchases
- LEA documentation reflected that each EL student had not been assessed for growth in English language acquisition using the state-approved test ACCESS for ELLs

Equitable Services for Private Schools

General Information

Since the initial passage of the Elementary and Secondary Education Act of 1965 (ESEA), private school students and teachers have been eligible to participate in the Title I, Part A (Title I) program. The reauthorization of the ESEA by the Every Student Succeeds Act (ESSA) continues the requirement that a local educational agency (LEA) that receives Title I funds provide equitable services to eligible private school students, their teachers, and their families. This guidance is intended to be used in conjunction with the Title I statute and applicable regulations by both public and private school officials.

An LEA shall (a) after timely and meaningful consultation with appropriate private school officials, provide eligible children and/or staff, on an equitable basis, applicable services such as: instructional services, counseling, mentoring, one-on-one tutoring, professional development opportunities, etc., that address their needs; and for Title I, Part A targeted assistance programs (b) ensure that teachers and families of the children participate on an equitable basis (pursuant to ESSA, Section 1116).

Eligible Programs

Title I, Part A, Section 1117: (Equitable Services to Private Schools)

Title I, Part C: (Migrant Education)

Title II, Part A: (Teacher and Principal Training and Recruiting)

Title III, Part A: (English Learners)

Title IV, Part A: (Student Support and Academic Enrichment)

Title IV, Part B: (21st Century Community Learning Centers)

Overview of Selected Equitable Services Program Requirements

- LEA must keep annual documentation on file which meet all requirements of the ESSA, Sections 1117 and 8501
- LEA is required to provide equitable services for eligible private school students and staff
- Equitable Services must be secular, neutral, and non-ideological for all educational services, materials, professional development opportunities, and equipment
- Equitable Services must be provided in a timely manner
- LEA must document timely and meaningful ongoing consultation meetings

- LEA and private school officials shall both have the goal of reaching agreement on how to provide equitable and effective programs for eligible private students meeting the consultation requirements of Sections 1117 and 8501
- LEA must submit signed Affirmation of Consultation forms for each participating private school
- LEA is the fiscal agent and must maintain control of all federally funded purchases for materials, property, and equipment
- LEA must hire and oversee all staff providing instructional services to private school students
- LEA funds for private school educational services shall be obligated within the same fiscal year received
- Carryover of unobligated funds for private school services may only be Alabama State Department of Education (ALSDE) approved for extenuating circumstances • LEA shall provide to private school officials a written explanation for disagreements
- LEA must ensure all private school program services meet the needs (according to data) of the students/staff and are reasonable, necessary, allowable, allocable, and meet all Education Department General Administrative Regulation (EDGAR) requirements
- Private school officials shall have the right to file a formal complaint with the ALSDE if the LEA did not provide due consideration to private school official views or did not make decision(s) that treat private school/students equitably (after documented attempts to collaborate and reach an agreement with the LEA are not successful)
- Equitable services are monitored and enforced by the ALSDE

The Consultation Process

Consultation must be both timely and meaningful to ensure the equitable participation of private school students, teachers, and parents. It must occur before the district or other entity makes any decisions that affect the ability of private school students, teachers, and their families to equitably participate in the benefits of the program. Consultation begins early enough for the entire process of program design and development to be completed, for exploring the option of third-party providers, and for services to begin by the start of the school year.

Timely consultation requires that the public school district provide advance notice of consultation meetings to private school officials. Meaningful consultation covers all required topics and affords private school officials a genuine opportunity to express their views. Effective consultation is ongoing, two-way communication and discussion of the best ways to meet the needs of private school students and teachers under the provisions of the particular program. Consultation is significantly enhanced when public school officials provide information about

the amount of funds available for services, in advance of any consultation meeting, in order for private school officials to have the opportunity to adequately prepare for discussions.

“Intent to Participate” Form

An “Intent to Participate” form is a document that LEAs send annually to private school officials to determine their interest in participating in Title I equitable services. The form might include a brief description of the programs for which equitable services are available as well as a list of allowable activities, services, and benefits. Some LEAs send this form by registered mail in order to document receipt of the form by private school officials. An LEA might also send such form by email with read receipt.

An LEA may set a reasonable deadline, taking into consideration private school schedules, for private school officials to indicate their intent to participate. An LEA should provide clear and enough notice of the deadline, identify potential consequences for not meeting the deadline, and give adequate time for private school officials to respond.

Determining Which Private Schools to Contact

An LEA has a responsibility to contact all private schools within the district that might have students eligible to participate in Title I programs—i.e., students who live in a participating Title I public school attendance area in the LEA. An LEA also has a responsibility to contact private schools outside the district if the LEA has reason to believe students who reside in a participating Title I public school attendance area attend those schools. An LEA may not be aware, however, of every instance in which a student who resides in a participating Title I public school attendance area attends a private school outside of the district. Thus, if a private school has students, it believes may be eligible for Title I services because they reside in a participating Title I public school attendance area in another LEA and the private school has not been contacted by that LEA, it would be prudent for private school officials to contact the LEA directly in order to ensure that their eligible students are considered for Title I services.

Documentation to Support That Meaningful Consultation Has Occurred

It is also good practice for an LEA and appropriate private school officials to maintain a record of notes about topics addressed and decisions made during consultation meetings. Retaining meeting agendas and sign-in sheets is also good practice. In order to verify that it has met the requirement for timely and meaningful consultation and has provided equitable services, as a best practice, an LEA may want to document that it has:

- Annually informed the private school officials of the opportunity to participate in the Title I program and the various services available;

- Engaged in timely consultation, allowing for meaningful discussion between the LEA and appropriate private school officials regarding services and other benefits;
- Identified the needs of private school students, teachers, and families;
- Allocated a per-pupil amount of funds for services to private school students, teachers, and families that is calculated from the proportional share in accordance with ESEA section 1117(a)(4)(A);
- Provided services, programs, materials, and resources;
- Evaluated programs and services for effectiveness; and
- Adequately addressed problems and formal complaints raised by private school officials.

Allocating Funds for Equitable Services

An LEA would determine the proportionate share of funds available for equitable services as follows:

1. Based on prior year's data, determine the total number of children from low-income families residing in each participating public school attendance area who attend public and private school
2. Determine the overall proportion of these children who attend private schools
3. Apply this proportion to the current year's allocation to determine the amount of funds available for equitable services.

In addition, LEAs must reserve at least 1% of its Title I allocation for parent & family engagement activities if the LEA's entitlement exceeds \$500,000. LEAs must calculate the proportionate share of the 1% of the Title I allocation.

Transferability

Under the ESEA, LEAs may transfer funds they receive by formula under certain programs to other programs to better address local needs. Before a transfer of funds from a program subject to equitable services requirements, timely and meaningful consultation must occur between the LEA and private school officials. The purpose of the meeting is to describe federal programs impacted by the transfer and to determine the intent of private school's participation in programs receiving transferred funds.

Complaints

Pursuant to §1117 and 8501 of the Elementary and Secondary Education Act of 1965, as amended by the Every Student Succeeds Act (ESSA), a private school official has the right to

file a written complaint with the ALSDE Ombudsman asserting that a school district did not engage in consultation that was meaningful and timely, did not give due consideration to the views of the private school, or did not make a decision that treats private school students equitably.

Private school officials filing a complaint with the Ombudsman concerning equitable services under ESSA must do so in writing and utilize the ALSDE form that requires the following information:

- full name, address, email address, and telephone number of individual(s) or organization(s) filing the complaint;
- description of the situation or allegation including whether or not the school district engaged in consultation that was meaningful and timely, gave due consideration to the views of the private school officials, or made decisions that treated private school students equitably;
- name of the school district the complaint is being filed against and names of any other agencies or employees involved;
- statement identifying which title requiring equitable services has been allegedly violated;
- all facts supporting the allegation; and
- efforts made to resolve the complaint with the school district.

Complaints, which must be signed by the individual(s) or organization(s) filing the complaint and copied to the school district, must be mailed to the ALSDE Ombudsman at the following address:

Alabama State Department of Education
Ombudsman for Equitable Services P.O.
Box 302101
Montgomery, AL 36130

Once the Ombudsman receives the complaint, he/she will respond to the complaint in writing within forty-five (45) calendar days. The Ombudsman's response will include his/her decision and information about filing an appeal, if necessary.

In the event the complainant is dissatisfied with the decision of the Ombudsman, the complainant may appeal directly to the Secretary of Education at the US Department of Education within 30 days of the decision of the Ombudsman. The Secretary investigates and resolves the appeal no later than 90 days after receipt of the appeal.

Evaluating the Effectiveness of Services

LEA officials must assess annually the progress of the Title I program toward enabling private school participants to meet the agreed-upon standards. Student performance results will be reviewed annually. When the standardized test information is available, the Title I teacher(s) and the private school official(s) will meet to analyze the assessment results for the participating students. Their goal is to determine whether the level of student performance, as measured by the standardized test, has met or exceeded the desired outcomes agreed to in consultation.

Based on consultation, the effectiveness of the Title I program at each private school will be measured through comparing the targeted percentage of students reaching the established performance-level standard and the agreed-upon year-end percentage of students achieving the performance level.

In the event the Title I program fails to meet the annual progress target, consultation will occur to examine the student performance data to determine whether modifications are required.

Equitable Services Procedures

Timely and Meaningful Consultation

All private schools that exist within the Bessemer City Schools zone will be provided annually with the opportunity to complete the “Intent to Participate” form and participate in the annual “Enrollment Survey”. Schools will be provided with information and support to guide their decision making in electing to participate in any Federal Program. Initial support will include contact via email, followed up with a letter sent via registered mail.

Schools that elect to participate will be invited to meet with the Bessemer City Schools Federal Programs Director and/or Director of Finance & Accounting multiple times throughout the year via email, virtual meetings, phone calls, and face-to-face meetings.

All meetings will be documented by the Federal Programs Supervisor in the contact log.

Meaningful consultation will include an explanation of each of the available Title programs, guidance in analyzing data and creating a needs assessment, support in selecting evidence-based programs, understanding program guidelines and allowability, selecting curriculum, and materials, evaluation of the program, and ongoing budget support.

Additional budget support will also include support through the Federal Programs Executive Secretary and Bessemer City Schools Staff Accountant to make sure that purchases fall within allowability guidelines and are processed efficiently.

Development of Equitable Services Plan

The Federal Programs Director will work closely with the private school to develop an equitable services plan that addresses the needs that the school has identified, ensure that supplanting does not occur, provide guidance in selecting evidence-based programs, and aid

the school in matching budgeted expenses to their needs assessment and school improvement plan. The Federal Programs Director will also collaborate with the school to ensure that if the school is participating in more than one Title program that the programs are viewed holistically to ensure that they do not supplant or overlap.

Secular, Neutral and Non-Ideological

The Federal Programs Director will ask private schools representatives to review the acknowledgement that all purchases and budgeted items paid for with Federal Funds must be secular, neutral, and non-ideological. A private school representative will sign this acknowledgment. The Federal Programs Director will review all purchases, budgets, and expenditures to ensure that Federal Funds are not used for any purpose that would be defined as religious or ideological in nature. Once received from Federal Programs, the Accounting Department reviews both budget and purchase requests in an effort to maintain internal controls and compliance.

Inventory

In the event that items are purchased for private schools that are equal to or greater than \$500.00 in value but less than \$5,000.00 in value, these items shall be coded into the district's accounting software as non-capitalized equipment and recorded as such on the district's inventory. Items that are equal to or greater than \$5,000 or are technological in nature are assigned an asset number by Bessemer City Schools. Bessemer City Schools will maintain an inventory that includes the asset number (if applicable), fund source, serial number, description of item, location of item, and date of purchase. Bessemer City Schools will maintain an annual review of the inventory and guide private schools in the disposition of items that are lost, damaged, or broken.

Monitoring

Bessemer City Schools will work closely with the private school to determine effective evaluations and monitoring of Federally funded purchases, educational initiatives, and hiring practices. Fiscal management and oversight will be provided by the Federal Programs Director working cooperatively with the Director of Finance & Accounting. An annual audit of financial records with the private schools will be included in the annual audit conducted by the Alabama Department of Examiners of Public Accounts.

No Charging of Non-Public School Stakeholders for Any Services

Bessemer City Schools will not charge any private school for any services which they provide, including but not limited to meaningful consultation, monitoring, inventory management, procurement of materials, and/or evaluation of programs.

Control of Funds, Materials, and Equipment

Bessemer City Schools will act as a fiduciary agent for Title allocations, budgets, inventory and purchases made for participating private schools. All purchases will be made through Bessemer City Schools following established policies and procedures for purchases and will only be made to the extent that they adhere to approved budgets (developed in consultation with the private school and Federal Programs Supervisor), meet programmatic expectations, and clearly match needs identified in School Needs Assessment. All purchases of materials and equipment will be considered the property of Bessemer City Schools and will be monitored following Bessemer City Schools inventory and equipment policies and procedures.

Personnel and Services

Personnel and services that are provided to non-public schools via participation in 1 or more Title program will follow the same established policies and procedures for personnel and services in Bessemer City Schools. Personnel paid with Title funds will be paid by Bessemer City Schools.

Ongoing Consultation

The meaningful consultation process will be part of an ongoing dialogue and collaboration between Bessemer City Schools and the participating private school. Ongoing consultation will include but not be limited to budget oversight, guidance with purchases, inventory management, academic evaluation, monitoring of personnel, and review of needs as indicated by school data.

Compliant Procedures

Bessemer City Schools will work closely with non-public schools to ensure that policies, procedures, budgets, and processes follow established guidelines for local, state, and Federal Compliance, including sharing records and inventory for compliance monitoring.

Additional Supplement, Not Supplant (SNS) Guidance

Title I, Part A Requirements

General Information - BCS shall use Federal funds received under Title I, Part A only to supplement the funds that would, in the absence of such Federal funds, be made available from State and local sources for the education of our students participating in programs assisted under Title I, Part A and not to supplant such funds. Our Methodology is located in our e-GAP application under related documents.

Compliance - To demonstrate compliance with [the supplement not supplant requirement], a local education agency shall demonstrate that the methodology used to allocate State and local funds to each school receiving [Title I, Part A funds] ensures that such school receives all of the State and local funds it would otherwise receive if it were not receiving [Title I, Part A funds].
ESEA Section 1118(b)(2)

- Under ESSA, an LEA’s allocation of State and local funds to schools is examined as a whole to ensure

Title I, Part A funds supplement, and do not supplant, State and local funds. An LEA can no longer be

required to identify that any individual cost or service supported with Title I, Part A funds is supplemental.

- An LEA must show that its methodology to allocate State and local funds to schools results in each Title I school receiving all of the State and local funds it would otherwise receive if it were not receiving Title I, Part A funds.

- An LEA’s methodology must be “Title I neutral” in that it allocates State and local funds to schools

without regard for Title I status. This demonstrates an LEA did not reduce the state and local funds

made available to a Title I school because such a school is also receiving Title I, Part A funds. This is

consistent with the purpose of the supplement, not supplant requirement.

BCS Current Methodology - The LEA is required to provide the demonstration requirements to ALSDE one time for the duration of the Title I, Part A program under ESSA unless the LEA adopts or implements a revised methodology for allowing Foundation Program and local funds (non-Federal) resources. In other words, the LEA must only demonstrate its methodology for allocating Foundation Program and local funds (non-Federal) resources once, unless and until Congress reauthorizes the Elementary and Secondary Education Act, so long as no substantive changes are made to the LEA’s methodology.

BCS assures that it is in compliance with the supplement, not supplant provisions within section 1118(b) of, and referenced throughout, the Every Student Succeeds Act. BCS has adopted and implemented methodology to allocate Foundation Program and local funds (non-Federal) funds to all schools in the LEA, regardless of title I status by the distribution of Foundation Program and local funds (non-Federal) resources based on a combination of the characteristics of the students and staffing and supplies. A copy of the methodology is located in the Related Document in e-GAP.

Presumptions of Supplanting for Federal Programs

According to both the U.S. Department of Education Non-Regulatory Guidance on Supplement Not Supplant in February 2008 and the 2019 Compliance Supplement, it is presumed that supplanting has occurred if one of the following three instances takes place:

- 1) An LEA used Federal funds to provide services that the LEA was required to make under other Federal, State, or local laws.

- 2) An LEA used Federal funds to provide services that the LEA provided with non-Federal funds in the prior year.
- 3) An LEA used Federal funds to provide services for participating children that the LEA provided with non-Federal funds for nonparticipating children.

These presumptions are rebuttable if the LEA can demonstrate that it would not have provided the services in question with non-Federal funds had the Federal funds not been available. Some examples of documentation that can be used to rebut the presumptions of Supplement Not Supplant:

- Fiscal or programmatic documentation to confirm that in the absence of federal funds, would have eliminated the expenditure in question
- State or local legislative action
- Budget histories and information

Bessemer City Schools makes every effort to make sure that we are following the supplement, not supplant, provision of each Federal grant by following the proper procurement procedures and monitoring of expenditures.

Chart of Supplement Not Supplant

Program Activities must be supplemental to State and Local funds	Program Activities must be supplemental to State, Local, and Other Federal funds
Title I, Part A Title I, Part D Title II, Part A	Title I, Part C-Migrant Children Education Title III, Part A-Language Instruction for English Learners & Immigrants Title IV, Part B-21st Century Community Learning Centers Title V, Part B-Rural Education Achievement Program Title IX, Part A-McKinney-Vento Homeless

Time & Effort (Stipend/Supplement | Substitutes | Other Federally Funded Salaries/Benefits)

An employee whose salary and wages are supported, in whole or in part, with Federal funds is required to document their time spent working on Federal programs. The submitted documentation is used to ensure that charges reflect an accurate account of the employee’s time and effort devoted to each Federal program. (Appendix B of 2 C.F.R. Part 225 (formerly OMB Circular A-87, Cost Principles for State, Local, and Indian Tribal Governments)

Time and Effort Uniform Grants Guidance (UGG) 2CFR 200.430(i)

Purpose

As a recipient of federal funds, Bessemer City Schools must comply with the Office of Management and Budget (OMB) Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards (“Uniform Guidance”). Bessemer City Schools requires all individuals who receive federal sponsored funding to comply with institutional policies regarding the proposing, charging, and reporting of effort on those awards.

2 CFR Chapter II Part 200 Subpart E §200.430 of the Uniform Guidance includes the federal regulatory requirements for compensation for personal services. This includes but is not limited to the specified Standards for Documentation for Personnel Expenses. Bessemer City Schools Time and Effort Reporting Policy is intended to meet these requirements.

Time and Effort Standards

All employees who are paid in full or in part with federal funds must keep specific documents to demonstrate the amount of time they spent on grant activities. This includes an employee whose salary is paid with state or local funds but is used to meet a required “match” in a federal program. These documents, known as time and effort records, are maintained in order to charge the costs of personnel compensation to federal grants. Charges to federal awards for salaries and wages must be based on records that accurately reflect the work performed. These records must:

- Be supported by a system of internal controls which provides reasonable assurance that the charges are accurate, allowable, and properly allocated;
- Be incorporated into official records;
- Reasonably reflect total activity for which the employee is compensated, not exceeding 100% of compensated activities;
- Encompass federally assisted & all other activities compensated by the District on an integrated basis;
- Comply with the established accounting policies and practices of the District and
- Support the distribution of the employee’s salary or wages among specific activities or costs objectives.

BCS Time and Effort Procedures

Certification of Effort: Federal requirements stipulate that anyone certifying another individual must have first-hand knowledge of that individual’s actual effort. Therefore, each faculty or staff member is responsible for signing his/her own Effort Report certifying actual effort along with the supervising administrator signature verifying the employee’s actual effort.

Reporting Periods: An employee who has a single cost objective has a position that is dedicated to a singular purpose. For instance, a Federal Programs Director is considered to have a single cost objective because the teacher works only with federal programs. For 100% Certification Single Cost Bessemer City Schools has semi-annual reporting periods that follow the Bessemer City Schools calendar.

Semester	Period of Performance	Certification Period
First	June 1 - December 31	January 1-31
* Second	January 1 - July 31	Varies

*Certification Period begins based on employees last working day of the school year

The semi-annual certification will identify:

- Employer’s Name
- Employees’ Name
- School or Department
- Federal Program
- Reporting Period
- Employee’s Position
- Employee’s and direct supervisor’s dated signature

Stipends and Substitutes

- Sign in sheets will be used to log time and effort documentation for extra hour pay related to a single cost objective. (e.g. Professional Development stipends paid from Title I, Part A or Title II, Part A.
- Manual Timesheets will be used to document time and effort for extra duties related to a single cost objective (e.g. Title I, Part A tutoring) for employees not able to utilize the Time Management System.
- A Certifications for Employee Stipends document will be used to log time and effort related to a single cost objective for employees who utilize the Time Management System. (e.g. summer tutoring, after school tutoring, parental coordinators, charged to Title I A) This document lists the following:
 - Name of Certifier
 - Title of Certifier
 - Employees names
 - Date/Range of qualified stipend
 - Amount of Stipend
 - Activity Performed
 - Cost Objective
 - Signature of Certifier
- In case a substitute teacher has replaced an existing federally funded teacher for at least a month, the substitute teacher will be required to complete time and effort documentation. The time and effort documentation completed by the substitute(s) depends on the required certification of the regular teacher.

Roles and Responsibilities

School Level Employees - For school level employees paid with federal funds, the immediate supervisor of the employee paid with federal funds is responsible for the distribution, collection, and retention of all employee Time and Effort Documentation. The immediate supervisor may designate a leader to ensure Time and Effort Documentation is distributed, collected, complete, accurate, retained, and available in the Federal Programs evidence box for review. If at all possible, hard copies of the documents should be maintained and sent to the Federal Programs Instructional Support person assigned to the school. However, in the event that a hard copy cannot be obtained, an electronic completion will be acceptable.

District Level Employees - Each district department which oversees federal funds will be responsible for the distribution, collection, and retention of the Time and Effort Documentation for district level employees paid with federal funds. The designated individual will review the documentation to ensure that it is accurate and complete. All Time and Effort documentation will be submitted to the Federal Programs Department. Departments will have documentation available for review. If at all possible, hard copies of the documents should be maintained and sent to Federal Programs; however, in the event that a hard copy cannot be obtained, an electronic completion will be acceptable.

Compliance Issues

The federal government reserves the right to impose penalties and/or disallow funding as a result of missing, incorrect, and incomplete Time and Effort Documentation. Birmingham City Schools makes every effort to ensure Time and Effort Documentation is compliant with the Uniform Grants Guidance.

- Common Errors with Time & Effort
- Organization pays salaries based on budget
- Organization does not have a documented policies and procedures for Time and Effort
- Effort certifications are signed before all work is completed
- Failure to reconcile actual effort to funding source

Title IX, Part-A McKinney-Vento Homeless Assistance Act

Local Educational Agency (LEA) Responsibilities

Title I, Part A funding requires that each LEA have a state educational agency (SEA) approved plan coordinated with the McKinney-Vento Homeless Assistance Act. LEAs must include in the local plan required under Title I, Part A, a description of the services the LEA will provide to homeless children, including those services it will provide with funds set aside under ESSA

Section 1113(c)(3)(A). As part of the LEA Consolidated Plan in eGAP 2.0, LEAs must examine and describe the needs of homeless children and youth in the Comprehensive Needs Assessment. The Comprehensive Needs Assessment informs the activities described in the LEA Consolidated Plan in eGAP 2.0. In addition, LEAs must also provide the name and contact information for the individual(s) designated as the LEA liaison for homeless children and youth.

Bessemer City Schools Federal Programs Director will work collaboratively with Student Support Services and the District's Homeless Liaison to ensure that BCS is in accordance with federal guidelines as it relates to our homeless population. Bessemer City Schools will:

- Describe the process for the identification and enrollment of homeless children and youth.
- Conduct an assessment of the educational and related needs of homeless children and youths in the area served by the LEA. This may be undertaken as part of a needs assessment for other disadvantaged groups.
- Describe the services to be provided to homeless children and youth to address the needs identified in the needs assessment.
- Reserve Title I, Part A funds to provide comparable services for homeless children and youth that attend non-Title I schools and provide educationally related support services to children in shelters and other locations where they live.
- Designate an appropriate staff person as an LEA Homeless liaison.
- Develop, review, and revise LEA policies to remove barriers to the enrollment and retention of children and youth in homeless situations.
- Describe the process for ensuring that transportation is provided to homeless children and youth.
- Describe the policies and procedures the LEA has to ensure that its activities will not isolate or stigmatize homeless children and youths.
- Ensure that accurate data is collected on enrolled homeless children and youth.
- Provide services to homeless students that are comparable to services offered to other students in the LEA.
- Assure that the LEA will meet the fiscal effort requirement.
- Assure that the LEA will collect and promptly provide data requested by the State coordinator.
- Assure that the LEA will use the funds in accordance with Section 722

Bessemer City Schools will:

- Inform school personnel, service providers, advocates working with homeless families, parents and guardians of homeless children and youths, and homeless children and youths of the duties of the LEA homeless liaisons.
- Implement a coordinated system for ensuring that homeless children and youths are advised of their choice of schools, are immediately enrolled, and are promptly provided with

necessary services, including transportation. Alabama State Department of Education September 28, 2023 | Page 100 Unless otherwise noted, all references to ESSA in this document refer to the Elementary and Secondary Act of 1965 (ESEA), as amended by Every Student Succeeds Act (ESSA) of 2015.

- Presume that keeping a homeless student in the school of origin is in their best interest.
- Coordinate the provision of services with local social service agencies and other entities and transportation, transfer of school records, and other inter-district activities.

Inventory Management (Property Management Systems for Federal Programs)

Property Classifications Inventory records of fixed or capital assets shall be maintained at the central office. An inventory of equipment items not classified as fixed or capital assets shall also be maintained at the central office. Fixed Assets inventory is defined as those tangible items owned by or in custody of the School District which has a significant value, a useful life of more than one year, and is used in conducting activities of the School District.

Fixed Asset Inventory to be accounted for include, but are not limited to:

- A. Real Property
 - a. Land & Land improvements
 - b. Buildings & Building improvements
- B. Construction in Progress
- C. Personal Property, i.e., equipment (\$10,000 or more)
 - a. Furniture and fixtures
 - b. Motor vehicles (autos, trucks, buses)
 - c. Instructional equipment
 - d. Non-instructional equipment

Equipment means tangible personal property (including information technology systems) having a useful life of more than one year and a per-unit acquisition cost which equals or exceeds the lesser of the capitalization level established by the District for financial statement purposes, or \$10,000. 2 C.F.R. §200.439 (Equipment).

Supplies means all tangible personal property other than Equipment. A computing device is a supply if the acquisition cost is less than the lesser of the capitalization level established by the District for financial statement purposes or \$10,000, regardless of the length of its useful life. 2 C.F.R. §200.1 (Supplies).

Computing devices means machines used to acquire, store, analyze, process, and publish data and other information electronically, including accessories (or “peripherals”) for printing,

transmitting and receiving, or storing electronic information. 2 C.F.R. §200.1 (Computing devices).

Capital assets means tangible or intangible assets used in operations having a useful life of more than one year which are capitalized in accordance with GAAP. Capital assets include:

- Land, buildings (facilities), equipment, and intellectual property (including software) whether acquired by purchase, construction, manufacture, lease-purchase, exchange, or a lease accounted for as a financed purchase under Government Accounting Standards Board (GASB) standards or a finance lease under Financial Accounting Standards Board (FASB) standards; and
- Additions, improvements, modifications, replacements, rearrangements, reinstallations, renovations or alterations to capital assets that materially increase their value or useful life (not ordinary repairs and maintenance). 2 C.F.R. §200.1 (Capital assets).

Non-Fixed Asset Inventory to be accounted for include items that do not fall under the above.

A. Inventory Procedure

The Bessemer City Schools system directs each school and department to perform an inventory annually. The central office will send each school/department an inventory count sheet to be filled out each school year. It is the principal/department head's responsibility to ensure the accuracy of the inventory list and that it is timely completed and returned to the central office.

In addition to annual inventory checks, at Bessemer City Schools, the Technology Coordinator or Inventory Liaison at the school/department level shall maintain inventory management for items purchased with federal, state, and local funds. The Technology Coordinator/Inventory Liaison will follow the process below:

When equipment is delivered to the school/department, the Technology Coordinator/Inventory Liaison will make sure the items are not damaged, verify the order against delivery receipt, equipment received and purchase order.

All equipment shall be tagged and labeled for inventory tracking. The items shall be labeled with a BCS label that includes: (1) the equipment is the property of Birmingham City Schools, (2) the equipment was purchased with federal funds, and (3) the fiscal year of the purchase.

Next, scan the item into the inventory Management System. This system will include for each item: description, serial/id number, barcode, vendor, cost, date acquired, location, purchase order number, and a check-in/check-out information.

B. Records

For each equipment and computing device purchased with federal funds, the following information is maintained by tagging by vendor, and tracked in the district inventory tracking system.

- Serial number or other identification number;
- Source of funding for the property;
- Who holds title;
- Acquisition date and cost of the property;
- Percentage of federal participation in the project costs for the federal award under which the property was acquired;
- Location, use and condition of the property; and
- Any ultimate disposition data including the date of disposal and sale price of the property.

C. Physical Inventory

A physical inventory of the property must be taken and the results reconciled with the property records at least once every two years. The Federal Programs Department, in conjunction with the Finance and Technology Director or liaison will perform semi-annual physical inventory checks at each school/department. Inventory site visits to validate the equipment will be scheduled. When a school/department receives Federal Programs equipment, the Federal Programs Office and Technology Director or liaison will ensure that the following information is included on the Federal Programs Inventory Equipment Form:

1. Item Description: Enter description of the items, including model number.
2. Serial/ID Number: Enter the serial number, asset tag number or other identifying number if the serial number is blank. Some items do not have a serial number. The barcode number will serve as the item's identifier.
3. Location: Enter the room number or location where the item can be found.
4. Assigned To: Enter the name of who has the item in possession.
5. Fund Source: Enter the funding source used to purchase the item.
6. Year Purchased: Enter the year the item was acquired/purchased.
7. Cost: Enter the purchase unit cost of the item.
8. Functional: Indicate if the item is working.
9. If No, Reason: Indicate the disposition of the item. If lost, stolen or damaged, explain the situation and submit a copy of the Request for Deletion Form and police report if stolen. If equipment is disposed of by transfer or surplus, explain the situation and submit a Transfer Form.
10. Purchase Order Number: Enter the purchase order number associated with the purchase.
11. Vendor: Enter the name of the vendor

D. Maintenance

In accordance with 2 C.F.R.313(d)(4), the District maintains adequate maintenance procedures to ensure that property is kept in good condition. All items purchased include a minimum 3-year warranty to cover maintenance and repairs from the vendor. If the warranty has expired, the district's technology technicians will accept the device to provide repairs. Devices also include virus & anti-theft protections for additional security. Once repaired by either the vendor or district's technicians, items/devices are returned to the student or employee. If not operable upon repair attempt, the device will be removed from inventory and a comparable device will be issued/replaced.

E. Lost or Stolen Items

The District maintains a control system that ensures adequate safeguards are in place to prevent loss, damage, or theft of the property. All items receive a district logo etched onto the device or an asset tag to distinguish Property of Bessemer City Schools, as well as a barcode to be scanned for entry in the district's inventory management system. Once the data for each item has been uploaded in the system, items/devices are signed out electronically to the student or employee by the school inventory/technology liaison. Computing devices are allowed to be taken home for remote use. The student and/or employee signs an agreement of responsibility/liability of awareness that the device is being removed from campus. **Title I students are not to be charged any fees due to lost, stolen, and/or damaged items or the replacement of any items, devices, or equipment purchased with Title funds.**

Lost items – Any lost item must be reported to the school inventory/technology liaison. The liaison will obtain a written statement or any supporting documents to update the district's inventory management system that the item has been lost and no longer operable.

Damaged items – Any item damaged shall be returned to the school inventory/technology liaison for submission to the technology or maintenance departments for repair. Once repaired (if applicable) and returned, the item will be reissued to the student or employee. If not repairable, the student or employee can receive a comparable device/item if available.

Theft/Stolen items – Any item stolen must immediately be reported to the school administration to request/obtain a police report. Once an interview/investigation has been conducted, the school inventory/technology liaison shall update the district's inventory management system of the stolen item and include/upload a copy of the police report.

F. Use of Equipment

Equipment must be used in the program or project for which it was acquired as long as needed, whether or not the project or program continues to be supported by the federal award, and the District will not encumber the property without prior approval of the federal awarding agency and the pass-through entity. When no longer needed for the original program or project, the equipment may be used in other activities supported by the federal awarding agency, in the following order of priority: (1) activities under a federal award from the federal awarding agency which funded the original program or project; then (2) activities under federal awards from other federal awarding agencies.

If a school/department closes or no longer needs a computing device, the devices will be transferred from the original location to another school/department that has either requested devices or needs additional support. The inventory/technology liaison will remove the devices from the original cost center's inventory and transfer (check-out) to another approved cost center electronically in the district's inventory management system and physically transported to the new school/department location.

During the time equipment is used on the project or program for which it was acquired, the equipment will also be made available for use on other projects or programs currently or previously supported by the federal government, provided that such use will not interfere with the work on the projects or program for which it was originally acquired. First preference for other use must be given to other programs or projects supported by the federal awarding agency that financed the equipment. Second preference is given to programs or projects under federal awards from other federal awarding agencies. Use for non-federally funded programs or projects is also permissible.

G. Disposal of Equipment

When it is determined that original or replacement equipment acquired under a federal award is no longer needed for the original project or program or for other activities currently or previously supported by a federal awarding agency, Finance Department will contact the awarding agency (or pass-through for a state-administered grant) for disposition instructions.

Generally, disposition of equipment is dependent on its fair market value (FMV) at the time of disposition. If the item has a current FMV of \$5,000 or less, it may be retained, sold, or otherwise disposed of with no further obligation to the federal awarding agency. If the item has a current FMV of more than \$5,000, the federal awarding agency is entitled to the federal share of the current market value or sales proceeds. If acquiring replacement equipment, the District may use the equipment to be replaced as a trade-in or sell the property and use the proceeds to offset the cost of the replacement property. Bessemer City Schools works with auction agencies which place the items out to auction based on the FMV. This will be determined by estimating the current cost of the goods and depreciating it by useful life to

determine a cost baseline. This process is handled through the BCS Finance Department. The Finance Department assesses and declares the item as surplus.

Records Retention

Financial records, supporting documents, statistical records, and all other non-Federal entity records pertinent to a Federal award must be retained for a period of three years from the date of submission of the final expenditure report or, for Federal awards that are renewed quarterly or annually, from the date of the submission of the quarterly or annual financial report, respectively, as reported to the Federal awarding agency or pass-through entity in the case of a subrecipient.

BCS Federal Programs will maintain records to show compliance for at least a five-year period.

Federal Grants Budget Overview

Bessemer City School works to ensure that federal laws and requirements are applied in a consistent and appropriate manner to meet the needs of students as required by federal grants.

Budget Development for Federal Grants

The following sources are used to collect data and to develop budgets for federal grants:

- Comprehensive Needs Assessment
- Evaluation results
- Alabama School Improvement Plan (ACIP)
- District Strategic Improvement Plan
- Staffing needs
- Grant requirements
- Carryover, if applicable
- Budget development meeting with school and district administrators
- Parent, teacher, student survey data
- Meetings to gather input from the community and stakeholders

Data is compiled on the budget worksheet and Harris (financial management software) to ensure budgeted amounts match allocations. The data is then used in the submission of the online e-Gap Grant application. Budgeting projections are performed by the Federal Programs Director. Data entry into the online e-Gap Grant application is performed by the Federal program director. The certification and submission of the completed online e-Gap Grant application is performed by the Federal Programs Director, the Chief School Financial Officer, and Superintendent.

Authorized Use of Federal Funds

- All expenditures utilizing Federal funds must comply with Federal Cost Principles. All costs must:
 - Be necessary and reasonable for proper and efficient performance and administration of Federal awards
 - Be allocable to Federal awards under the provisions of the Federal cost Principles;
 - Be authorized or not prohibited under State or local laws or regulations;
 - Conform to any limitations or exclusions set forth in the Federal Cost Principle, Federal laws, terms and conditions of the Federal award, or other governing regulation as to types or amounts of cost items; ● Be consistent with policies, regulations, and procedures that apply uniformly to both Federal awards and other district activities;
 - Be accorded consistent treatment. A cost may not be assigned to a Federal award a direct cost if any other cost incurred for same purpose in like circumstances has been allocated to the Federal award as an indirect cost;
 - Except as otherwise provided for in the Federal Cost Principles, be determined in accordance with generally accepted accounting principles;
 - Not be included as a cost or used to meet cost sharing or matching requirements of any other Federal award in either the current or a prior period, except as specifically provided by Federal law or regulation;
 - Be the net of all applicable credits;
 - Be adequately documented.

The Federal Programs Director in collaboration with the Federal Programs Executive Secretary, Chief Financial Officer, Director of Curriculum and Instruction will refer to the applicable program guidelines issued by the Alabama State Department of Education to determine the allowable use of grant funds and ensure that expenditures do not violate the Supplement Not Supplant requirement. In addition, the Federal Programs Director, CFO, and Director of Curriculum and Instruction that costs are allowable according to the program guidelines and conform to the Federal Cost Principles prior to the approval of any expenditure with Federal funds (34 C.F.R § 76.530-534) Federal purchases will require an Expenditure Form and other applicable documentation to be submitted with the request for purchase.

Carryover Funds

Carryover funds may be budgeted in one of the following ways:

- District-wide initiatives
- PPA to Title I Schools
- Combination of District-wide initiatives and PPA

It has been the practice of Bessemer City Schools to utilize carryover for district-wide initiatives. However, it is always based on the identified needs and recommendations made

by the district. The Federal Programs Director in collaboration with the CFO, and the Director of Curriculum and Instruction will decide based on needs what expenditures should be paid utilizing carryover funds.

Federal Procurement Guidelines

To ensure costs are allowable, all expenditures with federal funds must meet the federal purchasing requirements and be conducted in a manner providing full and open competition. (2 CFR 200.319 and 200.320)

Bessemer City Schools will maintain oversight and ensure that contractors perform in accordance with the terms, conditions, and specifications of their contracts or purchase orders. To ensure objective contractor performance and eliminate unfair competitive advantage, contractors that develop or draft specifications, requirements, statements of work, or invitations for bids or requests for proposals must be excluded from competing for such procurements. Some of the situations considered to be restrictive of competition include but are not limited to:

- Placing unreasonable requirements on firms in order for them to qualify to do business;
- Requiring unnecessary experience and excessive bonding;
- Noncompetitive pricing practices between firms or between affiliated companies;
- Noncompetitive contracts to consultants that are on retainer contracts;
- Organizational conflicts of interest;
- Specifying only a “brand name” product instead of allowing “an equal” product to be offered and describing the performance or other relevant requirements of the procurement; and
- Any arbitrary action in the procurement process.

Conflicts of Interest

Bessemer City Schools will ensure that the following standards of conduct covering conflicts of interest and governing the actions of its employees engaged in the selection, award and administration of contracts are met.

No employee, officer, or agent may participate in the selection, award, or administration of a contract supported by a federal award if he or she has a real or apparent conflict of interest. Such a conflict of interest would arise when the employee, officer, or agent, any member of his or her immediate family, his or her partner, or an organization which employs or is about to employ any of the parties indicated herein, has a financial or other interest in or a tangible personal benefit from a firm considered for a contract. The officers, employees, and agents of the LEA may neither solicit nor accept gratuities, favors, or anything of monetary value from

contractors or parties to subcontracts, unless the gift is an unsolicited item of nominal value. (2 CFR 200.318(c))

Bessemer City Schools standard of conduct includes disciplinary actions for violations of such standards by officers, employees, or agents of the LEA. A board employee, board member, or agent of the board who has knowledge of a possible conflict of interest should identify the conflict and notify the superintendent. The superintendent will document his or her actions related to the reported conflict of interest. Resolution can consist of disqualification, recusal, waiver, or other appropriate measures. Appropriate measures may include reporting a conflict of interest to the State Ethics Commission, the Alabama State Board of Education, or the appropriate federal agency.

Organizational Conflicts

If Bessemer City Schools has a parent, affiliate, or subsidiary organization that is not a state, local government, or Indian tribe, BCS will include written standards of conduct covering organizational conflicts of interest. Organizational conflicts of interest means that because of relationships with a parent company, affiliate, or subsidiary organization, the non-Federal entity is unable or appears to be unable to be impartial in conducting a procurement action involving a related organization. (2 CFR 200.318(c)(2))

Mandatory Disclosure Upon discovery of any potential conflict, Bessemer City Schools will disclose in writing the potential conflict to the ALSDE. The LEA must also disclose in writing to ALSDE all violations of federal criminal law involving fraud, bribery, or gratuity violations potentially affecting the award. 2 CFR 200.112 and 200.113.

Methods of Procurement

Bessemer City Schools will award contracts only to responsible contractors possessing the ability to perform successfully under the terms and conditions of a proposed procurement. Consideration will be given to such 37 BCS Federal Programs Procedures Handbook (2023-2024) matters as contractor integrity, compliance with public policy, record of past performance, and financial and technical resources. Below outlines the various methods of procurement required under 2 CFR 200.320. Micro-purchase

Micro-purchase means a purchase of supplies or services using simplified acquisition procedures, the aggregate amount of which does not exceed \$10,000. Procurement by micro-purchase is the acquisition of supplies or services, the aggregate dollar amount of which does not exceed the micro-purchase threshold. To the maximum extent practicable, Bessemer City Schools will distribute micro-purchases equitably among qualified suppliers.

Micro-purchases may be awarded without soliciting competitive price or rate quotations if Bessemer City Schools considers the price to be reasonable based on research, experience, purchase history, or other information and filed documents.

Small Purchase Procedures The acquisition of property or services, the aggregate dollar amount of which is higher than the micro-purchase threshold but does not exceed \$250,000. If small purchase procedures are used, price or rate quotations are obtained from an adequate number of qualified sources as determined appropriate by the non-federal entity. Additionally, all State procurement regulations must be followed if it is more restrictive in nature. Bessemer City Schools shall seek to collect three quotes from adequate sources.

Sealed Bids and Competitive Proposals

For purchases over \$250,000, Bessemer City Schools will use either sealed bids or competitive proposals. Sealed bids are publicly solicited, and a firm fixed price contract (lump sum or unit price) is awarded to the responsible bidder whose bid, conforming with all the material terms and conditions of the invitation for bids, is the lowest in price. The sealed bid method is the preferred method for procuring construction, if the following conditions apply:

- A complete, adequate, and realistic specification or purchase description is available;
- Two or more responsible bidders are willing and able to compete effectively for the business; and
- The procurement lends itself to a firm fixed price contract and the selection of the successful bidder can be made principally on the basis of price. If sealed bids are used, the following requirements apply:
 - Bids must be solicited from an adequate number of qualified sources, providing them sufficient response time prior to the date set for opening the bids, for state, local, and tribal governments, the invitation for bids must be publicly advertised;
 - The invitation for bids, which will include any specifications and pertinent attachments, must define the items or services in order for the bidder to properly respond;
 - All bids will be opened at the time and place prescribed in the invitation for bids, and for local and tribal governments, the bids must be opened publicly;
 - A firm fixed price contract award must be made in writing to the lowest responsive and responsible bidder.

Where specified in bidding documents, factors such as discounts, transportation cost, and life cycle costs must be considered in determining which bid is lowest. Payment discounts will only be used to determine the low bid when prior experience indicates that such discounts are usually taken advantage of. Any or all bids may be rejected if there is a sound documented reason.

Competitive Proposals

Competitive proposals are generally used when conditions are not appropriate for the use of sealed bids. They are awarded in accordance with the following requirements:

- Requests for proposals must be publicized and identify all evaluation factors and their relative importance. Any response to publicized requests for proposals must be considered to the maximum extent practical;
- Proposals must be solicited from an adequate number of qualified sources; and
- Contracts must be awarded to the responsible firm whose proposal is most advantageous to the program, with price and other factors considered.

The LEA may use competitive proposal procedures for qualifications-based procurement of architectural/engineering (A/E) professional services whereby the offeror's qualifications are evaluated, and the most qualified offeror is selected, subject to negotiation of fair and reasonable compensation. The method, where price is not used as a selection factor, can only be used in procurement of A/E professional services. It cannot be used to purchase other types of services through A/E firms that are a potential source to perform the proposed effort.

Noncompetitive Proposals (Sole Sourcing)

There are specific circumstances in which noncompetitive procurement can be used. Noncompetitive procurement can only be awarded if one or more of the following circumstances apply:

- Micro-purchases;
- The item is available only from a single source;
- The public exigency or emergency for the requirement will not permit a delay resulting from publicizing a competitive solicitation;
- The federal awarding agency or pass-through entity expressly authorizes noncompetitive proposals in response to a written request from the LEA; or
- After solicitation of a number of sources, competition is determined inadequate.

Contract/Price Analysis

Bessemer City Schools will perform a cost or price analysis in connection with every procurement action in excess of the simplified acquisition threshold, including contract modifications. (2 CFR 200.324(a)) A cost analysis generally means evaluating the separate cost elements that make up the total price, while a price analysis means evaluating the total price, without looking at the individual cost elements.

General Procurement Requirements

Avoiding Acquisition of Unnecessary or Duplicative Items

Bessemer City Schools will seek to avoid the acquisition of unnecessary or duplicative items. Additionally, consideration is given to consolidating or breaking out procurements to obtain a more economical purchase. And, where appropriate, an analysis must be made of leases versus purchase alternatives, and another other appropriate analysis to determine the most economical approach.

Domestic Preference for Procurement

Bessemer City Schools, to the greatest extent practicable, provides a preference for the purchase, or acquisition, of goods and products produced in the United States. Bessemer City Schools includes this preference in all contracts and purchase orders for work or products using federal funds.

Prohibition on Certain Telecommunications Companies

Bessemer City Schools will not procure, enter into a contract to procure, or extend or renew a contract to procure covered telecommunications and video surveillance equipment or services described in Public Law 115-232, section 889. Covered telecommunications and video surveillance equipment or services are those produced by Huawei Technologies Company, ZTE Corporation, Hytera Communications Corporation, Hangzhou Hikvision Digital Technology Company, or Dahua Technology Company, or any subsidiary or affiliate of such entities. (2 CFR 200.216)

Bessemer City Schools Purchasing Department will check www.sam.gov to ensure the vendor is not excluded for this reason. See OMB 2 CFR Frequently Asked Questions, Q-47

https://www.cfo.gov/assets/files/2CFR-FrequentlyAskedQuestions_2021050321.pdf

Never Contract with the Enemy

Bessemer City Schools will comply with the regulations implementing Never Contract with the Enemy in 2 CFR Part 183 prohibiting contracts, grants and cooperative agreements that exceed \$50,000, are performed outside the U.S. and its territories, and are in support of a contingency operation in which members of the Armed Forces are actively engaged in hostilities. (2 CFR 200.215)

Debarment and Suspension

Bessemer City Schools will not subcontract with or award subgrants to any person or company who is debarred or suspended. Birmingham City Schools will document this requirement is met by either:

- Checking SAM at <http://www.sam.gov/>; or
- Collecting a certification from that person; or
- Adding a clause or condition to the covered transaction with that person.

Maintenance of Procurement Records

Bessemer City Schools finance department will maintain records sufficient to detail the history of all procurements. These records will include but are not necessarily limited to the following: rationale for the method of procurement, selection of contract type, contractor selection or rejection, the basis for the contract price (including a cost or price analysis), and verification that the contractor is not suspended or debarred.

Settlements of Issues Arising Out of Procurements

Bessemer City Schools is responsible, in accordance with good administrative practice and sound business judgment, for the settlement of all contractual and administrative issues arising out of procurements. These issues include, but are not limited to, source evaluation, protests, disputes, and claims. These standards do not relieve the LEA of any contractual responsibilities under its contracts. Violations of law will be referred to the local, state, or federal authority having proper jurisdiction. Therefore, the LEA must maintain protest procedures to handle and resolve disputes relating to procurements and, in all instances, disclose information regarding the protest to the awarding agency.