

# EMANUEL COUNTY SCHOOL SYSTEM



**FY 26  
FEDERAL PROGRAMS  
ADMINISTRATIVE HANDBOOK**  
Revision Date: July 28, 2025

## Table of Contents

- Organization, Structure, and Function of Federal Programs in Emanuel County Schools
  - Introduction/Overview
  - Federal Programs in Emanuel County Schools
  - District Personnel with Federal Programs Responsibilities
- Monitoring of Schools and Programs
- Code of Ethics with Fraud, Waste, Abuse, and Corruption
- Complaint Procedures
- Federal Programs Grant Management
- Financial Procedures 2 CFR 200.302
  - Financial Management System
  - Process for Developing and Monitoring the RAM/P
  - Federal Grant Budgeting Process
  - Cash Management Procedures
  - Segregation of Duties
  - Procurement Procedures
  - Allowability and Purchasing Procedures
  - Methods of Procurement
  - Conflict of Interest
  - Travel
  - Stipends
  - Time and Effort Documentation for Federally Funded Positions
    - Periodic Certification Procedures
    - Split Funded Personnel
- Federal Programs Equipment Inventory Procedures
- Programmatic Requirements
  - Title I
    - School Wide Schools
    - Comparability of Services
    - Maintenance of Effort
  - Set Asides
    - Parent and Family Engagement Set Aside
    - Parent and Family Engagement Set Aside Carryover
    - Homeless Set Aside
    - Neglected and Delinquent Set Aside
    - Private School Proportionate Share Set Aside
    - Procedures for Review and Approval of all Title I Plans and Budgets
- Notice To Parents of English Learners Participating in Title I or Title III Supplemental Language Programs
  - Parental Engagement
  - Building Capacity
  - Parent Involvement Plans – District Plan

Parent Involvement Plans – School Plans  
School-Parent Compacts  
Notification to Parents  
Attendance Areas and Allocations of Title I Funds  
Allocation of Title I, Part A Funds  
Private School Participation  
Title II, A  
    Federal, State, and Local Professional Qualifications  
Title V, B  
    Annual Evaluation Report Procedures  
Title I, Part C, Migrant  
Title X, Part C, Homeless  
Title IV, Part A  
Title III Exit Procedures

# **Organization, Structure, and Function of Federal Programs in Emanuel County Schools**

## **Introduction/Overview**

This handbook was created to assist district and school level administrators as well as other school personnel in the understanding of Federal Program law, administrative regulations, and in the procedural implementation of federal programs in Emanuel County Schools. It is made available through a link on the Federal Programs page of the school district website.

“Federal Programs” is a general term that refers to all federal laws and regulations associated with the requirements of the Elementary and Secondary Education Act of 1965 (ESEA) which provides supplemental federal funding to districts serving low-income students. This handbook applies to all of the federal programs in which Emanuel County Schools participates, which are listed below.

## **Federal Programs in Emanuel County Schools**

### **Title I, Part A: Improving Academic Achievement of Disadvantaged Students – Basic Programs**

Title I, Part A Basic Program grants provide supplementary educational services to pupils at public schools that have high concentrations of students from families that live in poverty. The purpose of the grant is to help improve teaching and learning for students most at risk of failing to meet State standards and to close the achievement gap.

### **Title I, Part C, Education of Migratory Children**

Title I, Part C grants provide high-quality and comprehensive educational programs for migratory children to help reduce the educational disruptions and other problems that result from repeated moves.

### **Title II, Part A: Professional Development for Teachers, Principals, and Others**

Title II, Part A grants provide funding for purposes related to recruitment, retention, and professional development of K-12 teachers and principals.

### **Title III, Part A: Language Instruction for Limited English Proficient (LEP)**

Title III, Part A grants provide funding to help ensure that LEP students, including immigrant students, attain English proficiency, develop high levels of academic attainment in English, and meet the same state academic content and student academic achievement standards that all students are expected to meet.

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

Emanuel County Schools Title Programs Administrative Handbook Page 4

[Return to Table of Contents](#)

Title IV, Part A grants are intended to improve students' academic achievement by increasing the capacity of States, LEAs, schools, and local communities to: 1) provide all students with access to well-rounded education, 2) improve school conditions for student learning, and 3) improve the use of technology in order to improve the academic achievement and digital literacy of all students.

### **Title V, Part B- Rural Education Achievement Program**

The Rural Education Achievement Program (REAP) is designed to assist rural school districts in using Federal resources more effectively to improve the quality of instruction and student academic achievement. It consists of two separate programs – the Small, Rural School Achievement (SRSA) program and the Rural and Low-Income Schools (RLIS) program.

### **ESSER Funding (CARES)**

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

### **District Personnel with Federal Programs Responsibilities**

**Superintendent-** Oversees the management of all school district activities; give final approval to all federal budgets and expenditures; reports to BOE.

**Assistant Superintendent-** manages all curriculum and instruction departments including Federal Programs, IDEA, and Homeless. Reports to the Superintendent.

**Federal Programs Director-** manages and maintains oversight of all federal program plans and budgets; responsible for initial approval all federal program expenditures; responsible for initial approval of all federal program budgets. Reports to the Asst. Superintendent.

**Financial Director-** manages, maintains oversight of, and accounts for all district budgets and finances and expenditures; reports to the Superintendent.

**Bookkeeper-** processes and accounts for all purchase order expenditures; provides guidance concerning the DOE Chart of Accounts and allowability of expenditures to help ensure compliance with federal program rules and guidelines; reports to Financial Director

**Payroll Clerk-** processes all payroll expenditures other than salaries; verifies through GAORS that grant requests made by the Financial Director are received and compares to DE 0147 reports for accuracy; reports to Financial Director

**Homeless Liaison-** will coordinate services for homeless children and youth through collaboration with system and school personnel and community organizations in order to identify children and youth experiencing homelessness in the district, both in and out of school to minimize the impact of homelessness on educational opportunities and services; coordinates with the Federal Programs Director; reports to the Asst. Superintendent.

**Principals-** responsible for submitting school-level federal program plans and budgets to Federal Program Director; responsible for implementing compliant school based federal program initiatives; report to Superintendent

### **Monitoring of Schools and Programs**

The following internal controls have been created and designed to provide reasonable assurance regarding the achievement of objectives in the effectiveness and efficiency of operations.

The purpose of Federal education program funding under the Every Student Succeeds Act (ESSA) is to provide the Emanuel County School District and schools with supplemental financial resources and assistance in order to ensure equitable access to a high quality education, regardless of student economic status or other equity factors. Under a variety of recent state-granted flexibility structures (waivers), all Georgia school LEAs have the opportunity to pursue flexibility in exchange for agreeing to measures that will ensure that all students receive an equitable and high quality education from effective educators. Federal program funds in Georgia supplement and support the programs and strategies that help all students increase academic achievement through these existing flexibility structures and systems.

While Federal funding comes to Georgia through a variety of funding sources with specific intents and purposes, the Emanuel County School District and schools are required to coordinate Federal funding allocations into the existing flexibility agreements in a manner that ensures that the intent and purpose of each Federal program is maintained. In support of LEA autonomy, Georgia LEAs may consolidate planning efforts (improvement planning, strategic plans, and charter/ strategic waiver applications) thereby allowing Georgia LEAs the benefit of carrying forward their existing flexibility structures and systems with the logical integration of Federal funding where and when its defined use is best suited.

LEAs apply for their Federal funds through a consolidated application process to GaDOE. The application requires LEAs to identify the methods through which the intent and purpose(s) of each Federal program will be integrated into the LEAs' existing academic achievement targets and efforts towards continuous improvement.

Responses as to how the Emanuel County School District will meet Federal program requirements, as defined in ESSA, are submitted in the consolidated application through the lens of the flexibility structure of the district. Since very unique and targeted Federal funding streams exist, such as IDEA, required set asides, and Migrant, the Emanuel County School District must expand on the identified needs for these populations or schools within their Federal consolidated funding application. This often requires the Emanuel County School District to look more deeply at the root causes of the academic deficiencies of schools and specific populations. Through the consolidated application, GaDOE supplies CNA tools to support examining progress.

The Georgia Department of Education requires that Emanuel County School District monitor the implementation of federal programs, transferability, consolidation, and the expenditure of all funds associated with specific programs. The requirements are as follows:

The Director of Federal Programs will conduct monitoring of all schools and programs (except IDEA) sufficient to ensure compliance with applicable program requirements and the intent and purpose of all federal programs. The SPED director are in charge of those programs.

The Director of Federal Programs and applicable personnel will attend training hosted by the GaDOE and other sources to maintain proficiency in federal program compliance requirements.

The Director of Federal Programs and/or specific program directors will provide technical assistance to local schools as needed and will monitor all program expenditures to verify that all program expenditures comply with the intent and purpose of each program during the consolidation of funding initiative.

The Director of Federal Programs will monitor all program expenditures of programs not included in consolidation to verify that all program expenditures comply with federal program requirements.

The Director of Federal Programs will maintain all documentation the LEA may need to verify compliance. In years when Emanuel County School District does not receive an on-site visit or participate in desktop monitoring, the Director of Federal Programs will complete a self-assessment.

The Emanuel County School District will undergo monitoring by GaDOE on a four year cycle unless otherwise modified by GaDOE. LEA/Program Director(s) will participate in training and technical assistance updates as provided by GaDOE prior to the monitoring visit.

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

Monitoring is an essential component of ensuring that all facets of the Federal programs are being implemented as prescribed by ESSA. It is a process of providing technical assistance and collecting data in order to provide information that can guide program implementation and monitor school improvement. The Emanuel County School District makes use of monitoring to ensure that all activities are carried out in accordance with federal guidelines and each program's intent and purpose. Critical to this process is the feedback provided to schools that can assist in improving student academic achievement. District monitoring addresses the following:

- Creation, Approval/Revision, and Implementation of School Improvement Plans
- Supplement Not Supplant
- Equipment inventory and usage
- Fiscal Management (COF Budgets)
- Academic Assessments
- Parental Notifications
- Professional Learning
- Identification and Verification of Corrective Actions
- Ensuring that all federal program activities not included in consolidation are carried out in accordance with federal compliance guidelines.
- Ensure that all consolidation activities meet the *Intent and Purpose* as defined by the school.

The Elementary and Secondary Education Act of 1965 (ESEA), as reauthorized by the Every Student Succeeds Act of 2015 (ESSA), requires the state educational agency (SEA) to monitor the implementation of program requirements and the expenditure of federal funds. Georgia's monitoring process consists of five major components:

1. Program Requirements : LEAs must submit for approval the Consolidated LEA Improvement Plan (CLIP) through the consolidated application process. Federal Program Specialists review each CLIP to ensure that the plan contains allowable activities for use and budgeting of federal monies. Once the CLIP has been approved, the LEA submits a budget reflecting the approved CLIP activities for

review and approval by the Federal Programs staff assigned to the LEA. The LEA updates its CLIP under ESSA, as needed, to reflect changes, and submits the updated CLIP to the SEA for review and approval. Updates to the CLIP are typically performed on an annual basis.

2. **Monitoring of Expenditures :** LEAs must submit for approval an annual set of budgets, including for consolidation of funds, through the consolidated application process. Federal Program Specialists review each approved CLIP and program budget to ensure that expenditures are appropriate under program-specific federal guidelines and Uniform Grants guidelines before approving the budget. Once budgets are approved, Federal Program Directors monitor the funds drawn down for expenditures to ensure that LEAs are likely to meet the drawdown of funds timelines. If the Federal Programs Director at the LEA level receives an email concerning the timeliness of the district's drawdowns and/or percent drawn down from the GADOE Federal Program Specialist, the emails are forwarded to the LEA Finance Director for corrective action.
3. **Single audit:** LEAs with single audit findings are flagged for technical assistance.
4. **On-Site Monitoring:** An SEA on-site Cross-Functional Monitoring Team visits a LEA to review the criteria included in the LEA monitoring rubric. LEAs are monitored, at a minimum, on a four-year cycle.
5. **Self-Monitoring:** LEAs not receiving an on-site visit complete a self-assessment.

## **Communication and Monitoring**

Monitoring of schools receiving federal program funds directly or through consolidation is a critical component of ensuring that compliance is taking place at each school. School personnel receive guidance for specific programs as well as requirements of being a consolidated funding site.

Use of funds and program implementation at the school level is monitored through on-going technical assistance, site visits, district meetings, and through the budget/CNA process. Principals are provided guidance and information on compliance and procedures of consolidation and transferability during district principal meetings. Specific training is provided in the areas of consolidation, budgeting, new federal requirements, assessment requirements, as well as McKinney-Vento. New program updates are provided by program directors and the Director of Federal Programs during administrative meetings during the school year as needed. Communication takes place between the specific program directors and other staff members through phone calls, emails, texts, PLCs, and face-to-face meetings.

The district's Director of Federal Programs communicates with school principals and school level personnel providing guidance and ensuring that schools meet federal requirements for family and parent engagement for all programs. District and school level personnel collaborate on school improvement efforts by communicating through emails, phone calls, informal and formal meetings, PLCs, and work sessions. The needs of each school and the district are reviewed annually as part of the overall school improvement/CNA process. Staff members participate in the needs assessment process through school level leadership teams and PLCs. School level personnel also receive information on the budget, inventory, parent and family engagement, the district's fraud policy, the Code of Ethics, assessment security, and reporting of accountability as required.

Meetings are held throughout the year with administrators, curriculum specialists, and the Parent Resource Room Manager, to discuss specific program information and best practices. Phone calls, site visits, and emails are a daily occurrence between school staff and district program personnel.

### **Verification of Monitoring**

The Director of Federal Programs maintains all documentation related to verification of program monitoring. Documentation that may be included is listed as follows:

- Onsite Monitoring Checklists/Notes
- Feedback to Schools for Corrective Action or Recommendations (emails, Federal Programs School Visit Form)
- Sign in sheets/Agendas of Technical Assistance meetings
- Email/Phone Correspondence
- GaDOE checklists
- Work Calendars
- Observation notes
- TKES Data/observation schedules
- PLC schedules/information
- Monitoring of SLDS Progress Monitoring Platform

### **Process for Identification of High Risk Schools**

Emanuel County Schools will use state data reports to determine if any school is considered at risk. If a school is identified, the district will meet at the beginning of the school year or within a timely manner after the report is received to determine a plan of action for addressing the school's needs and what resources may be needed to support

the school in the implementation of the school's improvement plan. Other considerations will include school leadership, demographics, CCRPI scores, employee absences, student absences, and attrition rates.

### **Onsite Monitoring Procedures**

All schools are subject to on-going monitoring throughout the school year. The Director of Federal Programs is responsible for on-site monitoring of all schools throughout the year for compliance with federal guidelines. Feedback is provided to the principals via emails, staff meetings, and phone conversations which take place throughout the year as a means of providing on-going monitoring and communication with each school.

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

Corrective action from a previous monitoring may be reviewed with principals in order to assist them in understanding the critical need for compliance in federal programs. Professional learning may be provided based on identified needs at the school as well as the district level. In addition, professional learning opportunities (PLCs) are used as a preventive measure to ensure that all personnel have a clear understanding of all expectations for every facet of the district's programs. The Director of Federal Programs with district level staff and outside consultants, provide on-going professional learning as a means of ensuring that all program staff are in compliance and aware of each school's Intent and Purpose statement. When corrective action is needed the Director of Federal Programs documents areas in need of completion and/or correction and provides detailed reports to school principals or supervisors, clearly articulating required corrective action with due dates.

### ***Federal Programs Monitoring of School & Plans***

- Principals and/or their designee receive updates and information for the upcoming school year's SIP during the CNA process.
- Principals and/or their designee submit their Schoolwide/School Improvement Plans to the Director of Federal Programs.
- The Director of Federal Programs reviews the documents.
- The Director of Federal Programs communicates with the school via email, phone, and/or onsite meetings regarding the plan. If corrective action is needed, the specific actions are notated in the communication to the schools.
- Once the plans have been revised and completed, the principal and/or their designee re-submits the plan for approval.
- The Director of Federal Programs reviews the plan again and repeats the processes of revisions, corrections, and communicates with schools until the plans are complete.

- The plan is used to develop the schools budgets for consolidation as well as specific programs.

## **Timeline for Monitoring Federal Programs**

### **July**

- Submit CLIP to GaDOE by July 31.
- Provide technical assistance sessions for all schools following the GaDOE Federal Programs Conference on any new guidelines if applicable.
- Complete copy of “Parent’s Right to Know” letter
- Post approved “Parent’s Right to Know” letter on school website.
- Give guidance on Title I Annual Meeting, School Parent Compacts, and Parent & Family Engagement Plans.
- Principal meetings for Parent & Family Engagement Annual schedule
- Update District Parent and Family Engagement Plan

### **August**

- Work with administrators and school personnel on annual revision of SIP plans and budgets to ensure that funds are being spent according to plans
- School schedule review for certification/PQ/In-field by Title IIA and/or HR Director
- Notification of FY 26 allocations
- Meetings with admins, Curriculum Specialists, Parent Engagement Coordinators, Homeless Liaison, N & D Liaison and/or Directors, Title III Director, Superintendent, Finance Department, Human Resources, MFOC, and other departments pertinent to the Federal Programs as needed.
- Update Title I Inventory
- Migrant Parent Occupational Surveys go out to all students on first day of school
- SIP Plans Due/SWP checklists signed
- Home Language Surveys go out to newly enrolled students
- Collect schedules for necessary federally funded positions
- Meet with Title IVA advisory council
- Meet with ESOL staff to review EL entrance and exit procedures

### **September**

- Meet with Instructional Coaches - technical assistance
- Review of all new hires and certification plans by Title IIA and/or HR Director
- Review budget reports

### **October**

- Verification of all required parental notices have been distributed.
- Final schedules due to Title IIA and/or HR Director for CPI
- Distribute School-Parent Compacts
- Verification required that all Title I schools have held an informational Title I Annual Meeting
- Budgets due in Consolidated Application
- Completion Reports due - Oct. 31
- Submit documentation of building parent capacity
- Onsite Monitoring

### **November**

- National Parent Involvement Month
- Principal review of Certification Plans
- Federal Programs School Visit
- Federal Inventory Monitoring

### **December**

- Federal Programs School visit (if not completed in Nov)
- Discuss Results of Inventory Monitoring
- Carryover Funds to be budgeted for COF
- Meet with principals and ESOL staff to review Language Instruction Education Program
- Review progress on Title III Professional Learning Plan and Family Engagement Plan

### **January**

- Begin preparations for next year SIP
- Revise SIP if needed to align with carryover funds
- Collect schedules for necessary federally funded positions

## **February**

- Budget check for drawdown percentages/projections
- Federal program staff attends GCEL conference

## **March**

- Schools compile data at their site to determine needs for the following year.
- Principal review of Certification Plans
- 2<sup>nd</sup> review of schedules (CPI/In-Field review)
- Annual Spring Input Survey
- Onsite monitoring
- 

## **April**

- Begin revisions of Title I Parental Engagement Plan, Title I Schoolwide Plans, and School-Parent Compacts
- Annual Survey of Parent Involvement to gauge the effectiveness of parental involvement activities window opens
- Begin working on updating Policies and Procedures Handbook

## **May**

- Principal survey of Title I needs
- Revision of Parental Involvement Policy, School-Parent Compact, Title I Schoolwide Plan
- Annual Title I Input Meetings (2 meetings)
- Updated Federal Programs Inventory
- Meet with principals and ESOL staff to review Language Instruction Education Program
- Review progress on Title III Professional Learning Plan and Family Engagement Plan
- The Federal Programs Director will meet with principals to review data on strategies implemented in the previous year. The data will be used to determine effectiveness and to decide whether or not to continue with strategy.

## **June**

- Final district meeting to revise district parent involvement policy and plan.
- Final revisions of Title I Schoolwide Plan, School-Parent Compact, and Parental Involvement Policy
- Update Student and Personnel Handbooks for Title I updates
- Complete periodic certifications for all positions funded with federal grants.
- Meet with Title IVA advisory council

### **Ongoing Throughout School Year**

- Work with administrators and school staff on annual revision of plans. The Director of Federal Programs reviews the plans with central office level staff to ensure that funds are being spent according to the plan and the plan has all the necessary components. Periodic checks will be completed to verify the intent and purpose.
- The Assistant Superintendent has meetings as needed with all school level Curriculum Specialists. Administrators are welcome to schedule a meeting anytime assistance is needed with the Director of Federal Programs or any program director.
- The Director of Federal Programs is responsible for onsite monitoring of inventory and programs at schools. Any issues reported to the program director are needed.
- The Federal Programs Director provides technical assistance and meets as needed with principals, Human Resources staff, MFOC, Professional Learning staff, Homeless Liaison, and ESOL Coordinator.
- School Improvement Plans (SIP) include data which drives student achievement. The plans are monitored by the Director of Federal P and other administrators throughout the year. Based on continuous data analysis, administrators and leadership teams make changes to the school improvement plans.
- All schools benefiting from the use of federal funds are subjected to ongoing monitoring by the coordinator of each program throughout the school year. On-site monitoring of all schools is informal and ongoing throughout the school year. Feedback is provided as needed through phone calls, observation notes, emails, etc. In addition, emails, staff meetings, and phone conversations take place throughout the year as a means of providing ongoing monitoring and communication with each school. Feedback on the school improvement plans is sent to each administrator and/or curriculum specialist by the Director of Federal Programs via the schoolwide checklist if corrections are needed. Corrections to the plans are made as needed by each school site and updated copies are sent to the district office.

## Process for Working with Schools and Feedback

- June-September: The Director of Federal Programs will provide or schedule sessions for all schools following the GaDOE Federal Programs Conference to update principals and directors on any new guidelines if applicable.
- All district admin meeting sessions will include the following topics as standing agenda items open for discussion:
  - Budgets
  - Compliance (Ethics/Fraud Policy/Assessment/FERPA)
  - Parental involvement
  - Professional learning
  - Meeting the academic needs of students through schoolwide programs
  - Central office support and monitoring
  - Academic achievement (CCRPI)
  - Meeting intent and purpose
  - Infield/PQ/Equity
  - TKES/LKES
  - Inventory
  - Scheduling for Instruction
  - Needs of subgroups (SWD, ESOL, Migrant, Homeless)
  - Complaint procedures
  - Transportation Issues
  - Other
- June-July: The Federal Programs Director will work with principals on annual revision of compacts and parent involvement plans and will identify budget needs. The Director of Federal Programs will submit the CLIP by July 31.
- August: The Director of Federal Programs will work with all personnel to finalize the annual revision of SIPs and review SIPs and budgets to ensure that funds are being spent according to plans and that plans have all the necessary components.
- August-June: Meet with principals as needed. Provide additional training as needed.
- August-June: Inventory items purchased with federal funds. Monitor schools,

provide feedback and corrective action if needed.

- August-June: All federal programs are monitored as needed by the appropriate program coordinator. Ongoing review of school improvement data and plans. August-June: The Instructional Coach at each school will provide a minimum of two trainings per semester to staff regarding Building Staff Capacity to work with parents
- January-February: Conduct meetings with principals to review staff earnings, ensure school improvement plans and budgets are being implemented with fidelity, and begin the CNA process.
- February: GCEL conference
- Ongoing: Budgets are reviewed and each purchase order is examined by appropriate personnel to ensure purchases are allocable, reasonable, and necessary and that items purchased are supporting strategies contained in the system and/or school improvement plans. This process occurs through SoftDocs as purchase orders are routed through appropriate personnel. The Director of Federal Programs approves all softdocs requisitions for school based COF funds. Requisitions are compared to the Intent and Purpose of each federal program as well as the School Improvement Plan before they are approved.
- February-March: Begin the annual comprehensive needs assessment with stakeholders. Data is provided to system and school leaders so each can compile data to determine prioritized needs for the following year. Student, staff, parent, and stakeholder surveys are prepared for dissemination.
- Ongoing: Director of Federal Programs provides technical assistance and communicates with principals as needed through phone calls, site visits, emails, and/or staff meetings.

### **Monitoring of Neglected & Delinquent Facilities**

The Director of Federal Programs works with the facility director and/or school liaison to determine the needs of the facility to include the budget. Support and communication is on-going by emails, phone calls, and face-to-face communication with each facility director or the liaison. In addition, the Director of Federal Programs meets with the group home directors or school liaison on an annual basis or more frequently if needed. The group home directors have appointed a liaison for the district as well as specifically for the area of special education. Emails, phone calls, meeting, and observation documentation is kept on file by the Director of Federal Programs.

### **Data Review**

Data reviews for all schools are compiled and discussed during administrative meetings and at the Board of Education meetings when CCRPI results are released to the public. Schools meet and analyze data with the intent of improving instruction through grade

level and content PLCs. This information is used to identify the root cause of the academic needs of students and special populations. This information is discussed in detail and is reflected in the updated schoolwide plans each year.

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

Emanuel County School System makes an on-going effort to comply with all federal programs requirements. The Emanuel County School System makes a continuous effort to cooperate with state and federal auditors and state monitors.

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

Once the audit or Cross Functional Monitoring report is received, the Director of Federal Programs will review all items. Each item will be examined carefully, and the district leadership team will determine the best means of corrective action. Information is gathered and a report will be written by the Director of Federal Programs. The report will then be submitted to the Superintendent. The completed report is then sent to the GaDOE/state auditors as a means of resolution. The district has 30 days from the receipt of the findings to respond to the GaDOE. The monitoring process and the resolution process are both used as a learning resource.

Corrective action from a previous monitoring may be reviewed with principals in order to assist them in understanding the critical need for compliance in federal programs. Professional learning is provided based on identified needs at the school and district level. In addition, professional learning is used as a preventive measure to ensure that all personnel have a clear understanding of all expectations for every facet of the district's programs. The Director of Federal Programs with district level staff and outside consultants, provide on-going professional learning as a means of ensuring that all program staff are in compliance at all times if directly funded by a federal program. Training is conducted throughout the year for district personnel and school level personnel that directly support all facets of federal program compliance.

### **Results of Technical Assistance/ School Corrective Action identified by LEA**

Technical Assistance is offered at all times through communication via email or phone, as well as school visits, to assist schools in analyzing data to identify priorities in instruction, professional learning, and effective budgeting. Prior to the start or shortly after the beginning of the school year, the Director of Federal Programs meets with all principals to review the intent and purpose of all federal programs, as well as expectations and procedures related to allowable use of funds, including the flexibility of consolidation. A second meeting is held in January/February to remind principals of end of the year information and to provide preliminary information related to the upcoming

budget year. Documentation of federal program professional learning sessions, technical assistance, and meetings is maintained by the appropriate program director.

Ongoing monitoring is provided by all district level directors to ensure compliance. The Director of Federal Programs and other district staff maintain documentation of all professional learning conducted throughout the year. Documentation may include meeting agendas, meeting notes, participant feedback, sign-in sheets, phone logs, emails, etc. Ongoing support is provided by the LEA through leadership, program, grade level, and content PLCs ensuring that all schools are in compliance with specific programs if applicable as well as in compliance with the consolidated funding initiative. Any corrective action for school(s) as identified by the Director of Federal Programs and/or program director is documented and guidance is provided to the schools to ensure the corrective action plan is implemented.

## **Code of Ethics with Fraud, Waste, Abuse, and Corruption**

All educators are expected to abide by the Georgia Code of Ethics. Each newly hired educator must sign off that they have read and understand the Georgia Educator Code of Ethics. This documentation is kept in each employee's file. The Georgia Code of Ethics is also a topic of the annual first of the year faculty meeting that is attended by all staff members. The Emanuel County School System distributes this procedure through the ECS Personnel Handbook and it is a required component of the first faculty meeting of each year conducted by school administration. Building principals will ensure that all employees in their buildings are part of the presentation. All Emanuel County staff are required to read the current Emanuel County School Personnel Handbook within 30 days of the new school term or hire date. ECS Personnel Handbook is posted on the system website. Within the 30 days of the new school term or hire date, employees must submit a signed copy of the affirmation page to the school administrator. School administrators forward all affirmation pages to the Director of Human Resources. The Director of Human Resources will review all affirmation pages to ensure that all employees have turned in necessary documentation. Building principals forward meeting agendas and sign in sheets for faculty meetings in which related information is shared with all staff. Hard copies of the Fraud, Waste, Abuse, and Corruption Administrative Regulations and Procedures can be made available at each school and BOE office.

### **Fraud, Waste, Abuse, and Corruption Administrative Regulations and Procedures**

Each employee of Emanuel County Schools receives a copy of this policy once a year. Each employee signs that he/she received the Fraud Policy and procedures for reporting fraud, waste, abuse, and corruption. Documentation is maintained in the Title I Director's office.

## **FRAUD Policy (DIE) and Waste, Abuse, and Corruption Procedures**

### **PURPOSE:**

In compliance with White House Executive Order 12731, Emanuel County Schools provides employees, clients, vendors, and individuals with confidential channels to report suspicious activities. Emanuel County Schools shall not tolerate fraud, waste, abuse, or corruption of any kind and has an established system for the reporting of suspicious activities.

### **DEFINITIONS:**

- Fraud is a false representation of a matter of fact, whether by words or by conduct, or by concealment of that which should have been disclosed, that is used for the purpose of misappropriating property and/or monetary funds from local, state, or federal grants and funds.
- Waste is the intentional or unintentional, thoughtless or careless expenditure, consumption, mismanagement, use, or squandering of local, state, or federal resources to the detriment or potential detriment of the district. Waste also includes incurring unnecessary costs as a result of inefficient or ineffective practices, systems, or controls.
- Abuse is the excessive or improper use of a thing, policy or procedure, or to employ something in a manner contrary to the natural or legal rules for its use. It is also the intentional destruction, diversion, manipulation, misapplication, maltreatment, or misuse of resources. Abuse can also occur through the extravagant or excessive use of one's position or authority. Abuse can occur in financial or non-financial settings.
- Corruption includes dishonest proceedings, bribery, debasement, alteration, or perversion of integrity. Corruption threatens equal access, quantity and quality of education.

### **EXAMPLES OF FRAUD, WASTE, ABUSE, AND CORRUPTION: (NOT ALL-INCLUSIVE)**

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

**STATEMENT OF ADMINISTRATIVE REGULATIONS:**

Any and all reports of suspicious activity and/or suspected fraud, waste, abuse, or corruption shall be investigated. Emanuel County Schools shall not tolerate fraud, waste, abuse, or corruption of any kind, and any reported cases of suspected fraud, waste, abuse, or corruption will be thoroughly investigated to determine if disciplinary, financial recovery, and/or criminal action should be taken.

**CONFIDENTIALITY:**

All reports of suspected fraud, waste, abuse, or corruption must be handled under the strictest confidentiality. Only those directly involved in the investigation should be given information. Informants may remain anonymous but should be encouraged to cooperate with the investigators and should provide as much detail and evidence of alleged fraudulent acts as possible.

**PROCEDURES AND RESPONSIBILITIES:**

1. Anyone suspecting fraud, waste, abuse, or corruption whether it pertains to local, state, or federal programs, shall report his or her concerns to the Superintendent or the Superintendent's designee of Emanuel County Schools Central Office at 201 North Main Street, Swainsboro, GA 30401.
2. Any employee with Emanuel County Schools (temporary staff, full-time staff, and contractors) who receives a report of suspected fraudulent activity MUST report this information within the next business day. The employee should contact the Superintendent or Superintendent's designee at (478)237-6674. Employees have the responsibility to report suspected fraud, waste, abuse, or corruption. All reports can be made in confidence.
1. Emanuel County School's BOE or its designees shall conduct investigations of employees, providers, contractors, or vendors against which reports of suspicious activity are made. All investigations shall be thorough and complete in nature and shall occur in a prompt manner after the report is received.
2. If necessary, the person reporting the fraudulent activity will be contacted for additional information.
3. Periodic communication through meetings should emphasize the responsibilities and channels for reporting suspected fraud, waste, abuse, or corruption.
4. A hard copy of these Fraud, Waste, Abuse, and Corruption Administrative Regulations shall be posted in a visible location at all schools and facilities and on the Emanuel County Schools website ([www.emanuel.k12.ga.us](http://www.emanuel.k12.ga.us)).
5. A report shall be made to the Emanuel County Board of Education Chairman if fraud, waste, abuse, or corruption is suspected of or by the Superintendent. 8. Each employee shall receive a copy of this document and will sign attesting that he or she has indeed received this information and understands its contents.

## Complaint Procedures

- A. Grounds for a Complaint - Any individual, organization or agency (“complainant”) may file a complaint with Emanuel County Schools if that individual, organization, or agency believes and alleges that a local educational agency (“LEA”) is violating a Federal statute or regulation that applies to a program under the Every Student Succeeds Act (ESSA). The complaint must allege a violation occurred not more than one (1) year prior to the date that the complaint is received, unless a longer period is reasonable because the violation is considered systematic or ongoing.
- B. Federal Programs for Which Complaints Can Be Filed
- a. Title I, Part A: Improving the Academic Achievement of the Disadvantaged
  - b. Title I, Part A: Academic Achievement Awards
    - i. Title I, Part A: Flexible Learning Program (FLP)
  - c. Title I, Part A: Foster Care Program
  - d. Title I, Part A: Family-School Partnership Program
  - e. Title I, Part C: Education of Migratory Children
  - f. Title I, Part D: Programs for Neglected or Delinquent Children
  - g. Title II, Part A: Supporting Effective Instruction
  - h. Title III, Part A: Language Instruction for English Learners and Immigrant Students
  - i. Title IV, Part A: Student Support and Academic Enrichment
  - j. Title IV, Part B: 21st Century Community Learning Centers 12. Title V, Part B: Rural Education Initiative 13. Title IX, Part A: McKinney-Vento Homeless Assistance Act
  - k. Individuals with Disabilities Education Act (IDEA)
  - l. CARES ACT (ESSR) Funds
- C. Filing a Complaint - A formal complaint must be made in writing, signed by the complainant, and filed with the Emanuel County Schools Superintendent or his/her designee at the Central Office at 201 North Main Street, Swainsboro, GA 30401. The complaint must include the following:
- a. A statement that the LEA has violated a requirement of a Federal statute or regulation that applies to an applicable program;
  - b. The date on which the violation occurred;
  - c. The facts on which the statement is based and the specific requirement allegedly violated (include citation to the Federal statute or regulation);
  - d. A list of the names and telephone numbers of individuals who can provide additional information;
  - e. Whether a complaint has been filed with any other government agency, and if so, which agency;
  - f. Copies of all applicable documents supporting the complainant’s position; and
  - g. The address of the complainant.

Once the complaint is received by the Superintendent or his/her designee, it will be copied and forwarded to the appropriate Federal Program Manager.

- D. Investigation of Complaint - Within ten (10) days of receipt of the complaint, the Superintendent or his/her designee will issue a Letter of Acknowledgement to the complainant that contains the following information:
- a. The date the LEA received the complaint;
  - b. How the complainant may provide additional information;
  - c. A statement of the ways in which the LEA may investigate or address the complaint, and
  - d. Any other pertinent information.

If additional information or an investigation is necessary, the LEA will have thirty (30) days from the receipt of the information or completion of the investigation to issue a Letter of Findings. If the Letter of Findings indicates a violation has been found, corrective action will be required and timelines for completion will be included. The 30-day timeline outlined above may be extended, if exceptional circumstances exist. The Letter of Findings will be sent directly to the complainant, as well as the other parties involved.

- E. Right of Appeal
- a. If the individual, organization or agency does not agree with the decision of the Superintendent, an appeal may be filed with the Emanuel County Schools Board of Education.
  - b. Within thirty working days of receipt of the appeal of the Superintendent's decision, the Superintendent will present the matter to the Board of Education at its regular meeting or at a special meeting called for that purpose. The Board will review the original complaint, the response of the Federal Programs Director, the response of the Superintendent, and the response of the complainant. In addition, the Board may, but is not required to, hear directly from any individuals with knowledge of any relevant facts relating to the complaint.
  - c. The Board of Education will either uphold the recommendation of the Superintendent or require the District to take some other action in response to the complaint. A copy of the action of the Board will be furnished to the complainant, either as part of the minutes of the Board or as a separate written statement that will include the right to appeal to the Georgia Department of Education. The board will be the final reviewing authority within the system.
  - d. If an individual, organization or agency is aggrieved by the final decision of the LEA, that individual, organization, or agency has the right to request review of the decision by the Georgia Department of Education. The review is at the State School Superintendent's discretion.

- e. For complaints filed pursuant to Title IX, Part E, Subpart 1, Section 9503 (20 U.S.C. 7883, complaint process for participation of private school children), a complainant may appeal the LEA's decision to the Georgia Department of Education no later than thirty (30) days from the date on which the complainant receives the Letter of Findings. The appeal must be accompanied by a copy of the LEA's decision and include a complete statement of the reasons supporting the appeal.
- f. Nothing in this procedure is intended to prohibit the parties from resolving a problem prior to formal filing of a written complaint. At any stage of processing the complaint, the parties may mutually agree to attempt mediation as an alternative dispute resolution.

#### F. Dissemination

- a. Parents are notified of their right to file a complaint and of these procedures in the Title I Handout that is given to all students each year. Proof of receipt of the Title I Handout is maintained at each school and by the Federal Programs Director. This information is also shared at Title I Annual Meetings as well as other parent meetings throughout the year.
- b. A digital or a hard copy of the complaint procedures is provided to each employee October 1st of each year and each employee signs off digitally or by writing that they have received and understand the complaint procedures.
- c. A copy of these procedures will be available at each school and available online on the system's website.

### **Federal Programs Grant Management**

The Federal Programs Director is responsible for the management of all federal program grants in which the Emanuel County School System participates.

Responsibilities include:

- Submission and monitoring of all required federal program plans, budgets, and budget amendments in the Consolidated Application in the GaDOE portal
- Maintaining communication with and participating in (whether in person or through designee) training and technical assistance sessions provided by the GaDOE Federal Programs staff
- Maintaining all required and/or supporting documentation to verify compliance with federal program elements
- Collaborating with and providing technical assistance to school and central office personnel to ensure compliant, effective implementation of federal programs at the school and district level
- The Federal Programs Director will meet monthly at District Principals and Director's Meeting and quarterly with individual schools to monitor implementation and compliance.

**Financial Procedures 2 CFR 200.302**  
(applies to all federal programs)

**Financial Management System**

Emanuel County School System utilizes the Harris Hosting financial management system for all financials and payroll transactions. The Financial Director is responsible for the management of budgets and accounts payable.

Budgets are loaded into the Smartfusion/Harris Hosting system at the beginning of each fiscal year and tracked monthly through revenue/expenditure reports. Each month a staff accountant provides the Federal Program Director with a Monthly Requisition Report that includes a summary and detailed budget report for each federal program budget and a gross payroll distribution report for federal programs. The Federal Program Director reviews these reports each month to monitor expenditures and verify that the appropriate personnel are coded and paid from the appropriate federal budget

Financial records sufficient to support identification of the source and use of funds, budgetary control of funds, tracing of funds to a designated level of expenditure and preparation of reports are maintained by the financial department. These records include source documentation and other support, and are kept on file for the mandated time period, in compliance with applicable law and regulatory provision, at the district central office. Program records for federal grant funding, inclusive of some accounting/financial information, are kept on file for the mandated time period, in compliance with applicable law and regulatory provision, in the office of the federal program director.

**Process for Developing and Monitoring the RAM/P**

In the early spring, the financial director in collaboration with the Superintendent, district level administrators and school principals plan the allocation of state and local funds to develop the annual budget for the district and each school. During this process the initial RAM/P is developed using the latest FTE enrollment counts to allocate the personnel and non-personnel resources to ensure adequate instruction, student support, media services, improvement of instruction, and school administration for each school. The initial RAM/P for the upcoming school year is submitted by the federal programs director to the DOE via the Consolidated Application. Using CPI data, school schedules, school enrollment numbers, and special education staffing data, the RAM/P is revised at the beginning of the school year to adjust for staffing changes and tested/revised after October FTE count using FTE enrollment data, staff schedules from each school and budget and payroll spreadsheets downloaded from the Smartfusion/Harris Hosting financial accounting program.

## **Federal Grant Budgeting Process**

Upon federal grant award notice to the superintendent and the federal programs director, and notification to the federal programs director that federal budgets can be downloaded in the DOE consolidated application, the federal programs director begins the budgeting process for each federal grant for the current fiscal year. Using information from the Comprehensive Needs Assessment, and the Comprehensive Local Improvement Plan the federal programs director in collaboration with the superintendent, financial director, other district administrators, and school principals, develops federal budget priorities. Using excel budgeting spreadsheets for each federal program, the federal programs director enters all budget items for each program by function, object, and facility with descriptions of each budget item so as to meet programmatic requirements of each federal grant. Upon review by the superintendent, financial director, district administrators and school principals, each federal budget is entered and submitted through the DOE consolidated application. Upon approval by state program specialists, and grants accounting, the financial director enters the approved budget into the district financial management system.

## **Cash Management Procedures**

### **Drawdowns**

The director of finance is responsible for drawing down federal grant funds and prepares the requisition to the GaDOE monthly if expenses were incurred for that program in the prior month's expenditures. The director of finance has received both formal and informal training and is familiar with Federal Programs guidelines of Cash Management. Each federal program operates on a reimbursement basis and the director of finance is familiar with the guidelines concerning Cash Management, and that program costs need to be paid for by entity funds before the reimbursement from the GDOE is received. Requisitions are prepared based on the prior month's expenditures. The director of finance only requests federal funds in an amount as close to actual cash outlays as possible. Federal programs directors are given monthly budget reports and are responsible for signing off on all expenditure requests that are made. This ensures they monitor expenditures between drawdowns. When a drawdown is prepared, the monthly expense report is printed showing year to date expenditures. The finance director indicates the amount reimbursed to date, calculates the amount to be requested, and completes the drawdown. Signatures are acquired from the program directors, and copies of the drawdown request and the monthly budget report with the amount received to date are given to the federal programs directors for their records. A summary report is also given to each program director which indicates the drawdown amount, the total amount requested to date, and the funds remaining in each of his/her grants. The finance director prepares a list of requisition forms and gives them to the payroll clerk with the expected pay date. When the payment advice is received from GDOE, advice sheets are printed, and compared to the requisition forms for accuracy.

The finance director verifies that amounts are correct. Any discrepancies are communicated to GDOE.

### **Segregation of Duties**

Segregation of duties is critical to effective internal control because it reduces the risk of mistakes and inappropriate actions. Adequate segregation of duties reduces the likelihood that errors both intentional and unintentional, will remain undetected by providing for separate processing by different individuals at various stages of a transaction and for independent reviews of the work performed.

The basic idea underlying segregation of duties is that no employee or group should be in a position both to perpetrate and to conceal errors or fraud in the normal course of their duties. In general, the principal incompatible duties to be segregated are:

- Custody of assets
- Authorization or approval of related transactions affecting those assets
- Recording or reporting of related transactions
- Execution of the transaction or transaction activity

No one person should:

- Initiate a transaction
- Approve a transaction
- Record a transaction
- Reconcile balances
- Handle assets
- Review Reports

With our internal controls, we will be able to verify that the implementation of this award is conducted in an appropriate manner and to ensure that we avoid fraud and error.

### **Procurement Procedures**

The federal programs director is responsible for overseeing the procurement of goods and services with federal funds. All federal program purchases will be approved ahead of time by the federal programs director. All federal programs purchase requests will be made using the Federal Programs Purchase Request form in Harris Hosting software.

The Federal Programs Purchase Request form requires the following information:

- Date of Request
- Name of Facility
- Shipping Destination of Item
- Vendor Name
- Item Type
- Strategic Goals Addressed
- Description of Item(s)

- Total Expenditure
- Quote or other Documentation for Micro Purchases
- Secondary Quote for Small Purchases

### **Allowability and Purchasing Procedures**

Below is a description of the pre-approval of purchases. Purchase requisitions should use CSI, which will route documents and track approvals.

1. Once the Grant's budget is approved at the state level, purchase requisitions are completed at the school level to purchase items stated within each school's approved budget. In the notes section of the requisition, the school should list the school improvement plan goal and action step that matches the expenditure (i.e. G1AS3). Purchase requisitions are then forwarded to the building principal for review and he/she either denies or approves the purchase requisition or any item within. The purchase order is forwarded to the Federal Programs Director.
2. The Federal Program Director will review and either deny or approve the purchase requisition or any item within. Once approved, the purchase order is forwarded to Accounts Payable.
3. Accounts Payable will then convert the purchase requisition in DoceFill into a purchase order in the financial system (Smartfusion), generate a purchase order number, and enter it on the requisition in Smartfusion. Smartfusion will send the order to the company via fax or email
4. Once the items are received, someone at the school checks the items received against the packing slip and marks off any items not received. She/he signs the packing slip and sends it to Accounts Payable. If no packing slip comes with the order, Accounts Payable asks the person who requested the order if the items have been received. If all items are received, it is noted on the invoice before it is processed for payment. Once the payment is made, the packet is filed and later scanned for retention.

### *Consults, Contracts, Purchased Services*

Contracts are required for all consultants and purchased services to include coaching and technical assistance. Agreements are entered into between Emanuel County Schools and the consultant. Each contract contains the following:

- Contracts are generated by the vendor in conjunction with the program director for whom they will be rendering services.
- Specific duties are specifically spelled out for each contact.
- The person must also submit to be fingerprinted if they are working with students.
- The contract includes the number of hours to work and the rate of pay.

**Each contract is signed by the following:**

- Contractor
- Superintendent

The Title I Coordinator and other Federal Program Directors provide oversight in ensuring that all contractor's work is complete: artifacts, daily sign in sheets, and completion of all workshops. The Title I Coordinator and Other Federal Program Directors sign off on all invoices/contracts prior to the issuance of payment for services. These contracts must be maintained and kept in the Title I files and other Federal Program files.

Outside consultants must have a signed contract on file in the Title I Office before providing services. Each outside consultant must also complete a W-9 form and Contractor Affidavit or Exempt Affidavit under Georgia Security and Immigration Compliance Act and return to the Finance Department. A copy will be maintained in their file. This is necessary so that the Finance Department can provide a 1099 for them each year and comply with the Immigration Act.

Invoices for outside consultant services, or a timesheet shall be submitted to the Title I Office to be coded for payment. Payment for these types of services is through the Finance Department by a signed, approved invoice from the supervising program director once all services have been verified as having been received in full.

### *Purchasing Policy*

It is the policy of Emanuel County Schools to ensure that all disbursements of District funds are properly reviewed and authorized, and consistent with sound financial management principles.

It is the intention of Emanuel County Schools that the School District purchase goods and services that best meet the needs of the District at the best value. A competitive process will be followed for each purchase based on procedures or regulations to be determined by the Superintendent. The Superintendent or his/her designee shall have the authority to issue regulations, competitive solicitations, or other procedures governing this process where there exists no specific state law or State Board rule that must be followed.

The Superintendent or his/her designee is authorized to approve any and all purchases from budgeted funds of less than \$100,000.00. For any purchase in excess of that amount, the Superintendent shall provide written documentation to the Board of Education justifying the recommendation.

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

## **Purchasing Procedures**

### ***Board Governance***

Emanuel County Schools is committed to the establishment of policies for sound fiscal management in the area of procurement.

Authority to commit or spend District funds for the purchase of goods and services is vested in the Board of Education and is to be administered and managed by the Superintendent and staff in accordance with Board policy and the Board approved budget.

District funds shall not be committed or spent unless there is an approved budget item and available funds in the appropriate account. All purchases for which there are no budgeted funds require the prior approval of the Board.

Staff members involved in the procurement process shall comply with all applicable federal, state, and local laws, as well as the policies, rules, and regulations of the Emanuel County School District, the State Board of Education, and the Georgia Professional Standards Commission.

### ***Definitions***

As used in this policy, the term “capital project” means:

- 1) The building, designing, altering, repairing, improving, replacing, retrofitting, or demolishing of any public school structure or educational facility in the Emanuel County School District
- 2) The acquisition of school sites, buildings, or other fixed assets, whether by purchase or lease purchase or
- 3) The initial equipping and furnishing of educational facilities included under a construction contract.

The term “professional services” means services that require:

- 1) A degree in a particular professional field
- 2) A license from a state oversight board of similar authority or
- 3) The exercise of specialized skill, knowledge, creativity, or technical abilities. Professional services typically are better suited to a qualitative or subjective method of assessment, rather than a rigidly quantitative or objective method of assessment.

### ***Competitive Selection***

Competition among those seeking to do business with the District helps ensure that the District receives the best price for the goods and services it needs.

The School System reserves the right to reject any or all bids or proposals submitted in response to any solicitation and to cancel and/or re-solicit any solicitation. The School System also reserved the right to waive technicalities and informalities for all bids or proposals submitted in response to any solicitation.

Once the competitive selection is made, a purchase order must be generated and approved before the vendor is provided a purchase order number. If over **\$9,999**, a bid sheet must be completed.

#### A. Competitive Selection of Vendors for Capital Projects

1. Purchases or contracts with a total estimated cost of **\$9,999.99 or less shall be made at the discretion of the approver. Purchases or contracts with a total estimated cost of \$10,000.00 to \$99,999.99 shall be made based on at least two written quotes and selected based on objective criteria of performance and ability to execute.**
2. Purchases or contracts with a total estimated cost of \$100,000.00 or more shall be awarded through a written competitive sealed bid process to the lowest responsible, responsive bidder or through a competitive request for proposal process where the offer deemed to be most advantageous to the District may be selected. The decision whether to use a competitive sealed bid or a competitive request for proposal shall be made by the Superintendent or his/her designee, based on sound business judgement and the best interest of the District.
3. Contracts for professional services, as defined above, shall be awarded in the manner best suited to allowing a full assessment of professional abilities and other relevant criteria, while also ensuring an open and fair selection process that engenders public confidence. Competitive bidding seldom will be the best method for selecting professional services.
4. Proof of appropriate insurance shall be required for all bids or proposals with a total estimated cost of \$100,000.00 or more. Payment performance, and bid bonds in the amount of 5% of the bid or proposal shall be required for all construction contracts of \$100,000.00 or more.

#### B. Competitive Selection of Vendors for Non-Capital Projects

1. Purchases or contracts with a total estimated cost of **\$9,999.99** or less shall be made at the discretion of the approver and no quotes are required. Federal purchases must have at least two written quotes.
2. Purchases of contracts with a total estimated cost of **\$10,000.00 to \$99,999.99** shall be made on the basis of at least two written quotes and selected based on objective criteria of performance and ability to execute.
3. Purchases or contracts with a total estimated cost of \$100,000.00 or more shall be awarded through a written competitive sealed bid process to the lowest responsible, responsive bidder, or through a competitive request for proposal process where the offer deemed to be most advantageous to the District may be selected. (Federal Funds over \$150,000.00). The decision whether to use a competitive sealed bid or a competitive request for proposal shall be made by the Superintendent or his/her designee, based on sound business judgement and the best interest of the District.
4. Contracts for professional services, as defined above, shall be awarded in the manner best suited to allowing a full assessment of professional abilities and other relevant criteria, while also ensuring an open and fair selection process that engenders public confidence. Competitive bidding seldom will be the best method for selecting professional service. Purchases from federal funds must secure two bids.

#### C. Exceptions to Competitive Selection

All exceptions to competitive selection must be properly documented and retained by the approver for three years.

These exceptions allow the staff to select vendors without employing the competitive selection methods described above. Unless otherwise stated, however, approval at the appropriate level of authority is still required.

Use of the competitive selection measures described above is **not required** when:

1. The purchase or contract is necessitated by an emergency, defined as any situation resulting in imminent danger to the public health or safety or the loss of an essential governmental service. Only the Superintendent or his/her designee is authorized to declare an emergency. Emergency purchases shall be made using whatever process will enable the purchase to be made at the least cost to the District under the circumstances. Emergency purchases of \$25,000.00

or more require prior approval by the Superintendent and timely notification to all Board members.

2. The required goods or services are available from only one source, provided a reasonably diligent search has been made for other vendors or other appropriate information has been made for other vendors or appropriate information has been obtained to determine a vendor's sole source status. Written documentation of such determination shall be maintained by the purchaser.
3. The purchase made through contracts formally solicited and obtained by the State of Georgia, the federal government, or some other government agency. The District shall be authorized to make purchases through inter-governmental and educational cooperatives, alliances, and consortiums to achieve cost savings and administrative efficiencies based on economies of scale.
4. The purchase is for materials or programs selected by qualified professional personnel, based on sound pedagogical judgment and the best interest of the District, and acting at the direction of the Superintendent or his/her designee. **This exception does not apply to any items purchased with Federal funds.** The types of materials and programs covered by this exception include:
  - a) Instructional programs and textbooks.
  - b) Supplemental materials needed for instruction in the school, such as films, slides, video tapes, CDs, DVDs, educational kits, posters, displays, games, computer software, software, licenses, subscriptions, newspapers, periodicals, library books, reference materials, or other instructional material purchased from the publisher, distributor, or agent.
  - c) Tests, test preparation, and test scoring services of a standardized examination purchased from the publisher or licensed agent.
  - d) Membership in various educational or related organizations agencies or services providing direct benefits to the System.
  - e) Professional training programs for staff, the selection of which is left to the professional judgement of the administrator responsible for the professional development of the personnel attending or participating.
  - f) The purchase is a continuation of an existing purchase agreement, bid, request for proposal, time and material contract, rental, lease, or purchase order duly authorized by the Board or its agent.
  - g) The expenditure is for ongoing maintenance/support from the original vendor or an authorized agent of the original vendor and these services cannot be competitively bid.

- h) The expenditure is for additional orders or like equipment, material, supplies, services, rentals, or leases previously approved, provided the additional order is at the same or a lower price.
- i) The contract is for services to be provided by a government agency.

### ***Required Levels of Approval***

The appropriate level of approval is required for all contracts and purchases, including those that fit within an exception to the competitive selection measures. All contracts and purchases, for capital and non-capital projects require approval at the following levels before obligating the District:

#### **A. Levels of Approval for Capital Projects**

Purchases and contracts of \$99,999.99 or less require the prior approval of the Superintendent or his/her designee. Purchase and contracts of \$100,000.00 or more require Board approval based on recommendation of the Superintendent.

#### **B. Levels of Approval for Non-Capital Projects**

1. Purchases and contracts with a total cost of \$99,999.00 or less require the prior approval of the approver.
2. Purchases and contracts of \$100,000.00 or more require Board approval based on the recommendation of the Superintendent.
3. Purchases shall not be divided into smaller units in order to circumvent the required level of approval.

### ***Provisions Applicable to All Contracts and Purchases***

#### **A. Equal Opportunity**

All vendors and contracts shall have an equal opportunity to participate in the District's purchasing process without regard to race, color, sex, age, religion, disability, or national origin.

#### **B. Purchasing Card/Credit Card**

A purchasing card system may be administered by the District. The system shall allow purchases to be made by persons who have been approved to use the purchasing card.

Specific limits as to dollar amount per purchase, dollar amount per month, and types of products or services to be purchased shall be followed as outlined in the Purchasing Card Guidelines.

Misuse of a purchasing card constitutes a serious breach of the public trust and may result in termination of employment and/or referral to law enforcement authorities.

#### C. Multi-Year Contracts

Multi-year contracts with vendors are permissible, provided they comply in all respects with applicable state and federal laws, as well as Board policies and any restrictions imposed by the Superintendent. Any renewal or extension of a multi-year agreement must have the approval of the Board if the cost of the renewal or extension will be \$100,000.00 or more.

#### D. Purchasing Ethics

Employees involved in the District's purchasing and procurement decisions shall act as responsible stewards of public funds. They shall not use any information gained in the performance of their duties to advance their own or any other person's financial or private interests.

District Employees shall not solicit or knowingly accept any gift, gratuity, loan, special discount, entertainment, transportation, lodging, meals, favor, promise of future employment, or any economic opportunity, except those of value less than \$25.00, from any individual or entity that is interested directly or indirectly in business dealings or is doing business with the School District.

Any District employee who observes or has reason to believe that Board policy has been violated or that unlawful conduct has occurred or is occurring in connection with the procurement of goods or services for the District should report that behavior to the Superintendent or his/her designee.

Violation of purchasing ethics constitutes a serious breach of the public trust and may result in termination of employment and/or referral to law enforcement authorities.

#### E. Unauthorized Purchases

Employees shall be prohibited from purchasing equipment, material, supplies, services, rents, or leases in any form not prescribed herein. Any purchase contrary to this procedure shall be null and void and the School System shall not be bound thereby.

## F. Disqualification of Bidders or Vendors

A bidder or vendor may be disqualified from the award of a specific contract or from bidding on future contracts with the District if it is determined that the bidder or vendor, including the owners, officers, principals, or other individuals having a controlling interest in the business entity, has committed one or more of the following violations:

1. Has been convicted at any time under any state or federal statute of embezzlement, theft, forgery, bribery, falsification or destruction of records, receiving stolen property, antitrust or any other offenses indicating a lack of business integrity or business honesty which currently and directly affects its responsibility as a vendor with the System.
2. Has been debarred from bidding on or making proposals to any federal, state, or local government entity or agency.
3. Has willfully failed to perform without good cause in accordance with the terms and conditions of one or more contracts, or has a recent record of such conduct, with the District.
4. Has willfully violated the protocol or the terms and conditions of a formal solicitation while it is still in process.
5. Has a recent, documented record of unsatisfactory performance on one or more contracts with the District or some other business entity.
6. Has submitted any false certification, bond, license, insurance information, or any other required contract documentation to the District.
7. Has failed to cooperate with a District investigation.
8. Has committed any other action of a serious or compelling nature that may adversely impact the operation or reputation of the District.

With the exception of a willful violation of protocol or the terms and conditions of a formal solicitation while it is still in process, written rationale and justification from the administrator responsible for the contracting department with approval of the Boards legal counsel shall be required before any bidder or vendor may be disqualified under this policy. Disbarment citations shall be issued in writing.

## G. Withdrawal of Bids

1. If, after bids are opened, the low bidder claims an appreciable error in the preparation of the bid and can support such claim with evidence satisfactory to the administrator responsible for the contracting department in collaboration with the District, the low bidder shall be permitted to withdraw the bid.
2. The District may convene a panel to review the bid before determining whether the low bidder made an appreciable error in the preparation of his bid as claimed. Costs incurred in connection with the review shall be borne by the bidder seeking to withdraw.
3. Action on the remaining bids shall be considered as though the withdrawn bid had not been received.
4. If the project is rebid, the vendor who withdrew his bid shall not be permitted to submit a new bid on the project.

#### H. Nepotism/Conflict of Interest

An employee who is responsible for making purchasing decisions shall avoid any actions, relationships, or business transactions that conflict with the lawful interest of the Emanuel County Board of Education. An employee may not enter into a purchase transaction for any amount with any person known to be related by blood or marriage between the vendor/contractor or its agents and the requesting employee.

#### I. Suspension and Debarment

Federal requirements indicate that non-federal entities are prohibited from contracting with parties that are suspended or debarred, or whose principal agents are suspended or debarred. Covered transactions include any individual contract for goods or services that is expected to equal or exceed \$25,000.00. The Emanuel County School District utilizes the System for Award Management at [www.sam.gov](http://www.sam.gov) to search vendors to verify that they are not suspended or debarred. The System for Award Management (SAM) is a Federal Government owned and operated free website. It is required to receive any Federal grant award monies.

If the total expense exceeds \$25,000.00 on an individual contract, **the Federal Programs Director** will conduct a search using SAM and maintain time-stamped documentation of said search. No purchase can be made if the SAM report indicates that the vendor has an Active Exclusion.

Instructions on how to use SAM:

Access the SAM online registration at [www.sam.gov](http://www.sam.gov)

Create a User Account  
Select "Individual Account"  
Enter the requested information and submit  
After you have registered, you will receive an activation link from sam.gov to activate your account. The action must be completed within 48 hours of receipt of the confirmation email.  
Passwords expire every 80 days

Viewing the Entity Record:  
Search Records  
Quick Search  
Enter Business or DUNS number  
Search

The vendor's search screen will have a square that indicates Entity or Exclusion. If the square indicates Exclusion, you cannot order from this vendor.  
The vendor's search screen will show the question: Has Active Exclusion? If the answer is "Yes", you cannot order from this vendor.

If the vendor does not have an Active Exclusion, you can print the form and attach it, along with the Bid Sheet, to a Purchase Requisition in Docefill or email a copy to Accounting if you are doing the Purchase Requisition in CSI.

Documentation should include:

- 1) The name keyed in the search field
- 2) The date should print on the top or bottom of the page automatically
- 3) The name of the person doing the search
- 4) The result of the search

Documentation will be electronically filed with the Purchase Order and any other documentation in DoceScan.

### ***Expenditure of Funds***

All purchase requests must be completed in DoceFill or CSI. Teachers and/or bookkeepers can enter purchase requisitions at the school level and then forward to their principal or director for approval. Principals and Directors use electronic approval. The entire approval process with dates and electronic signatures follows the purchase request and is available for review through DoceFill and/or CSI.

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

Expenditure of federal funds must meet the clause of “reasonable and necessary”. When considering a purchase with federal funds, the following items must be considered:

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

### ***Allowable Cost-EDGAR***

Emanuel County Schools will enforce appropriate procedures and penalties for program, compliance, and accounting staff that are responsible for the allocation of federal grant costs based on their allowable ability and their conformity with federal cost principals.

### **Definitions**

Allowable cost-A cost that complies with all requirements that apply to a particular federal education program including statutes, regulations, guidance, and application funds.

Education Department General Administrative Regulations (EDGAR)-A compilation of regulations that apply to federal education programs. These regulations contain important rules governing the administration of federal education programs, and include rules affecting the allowable use of federal funds (including rules regarding permissible costs, the period of availability of federal awards, documentation requirements, and grants management requirements). EDGAR is accessible at <http://www2.ed.gov/policy/fund/reg/edgarReg/edgar.html> Federal cost principles that provide standards for determining whether costs may be charged to federal grants. EDGAR requires all grantees and sub grantees to follow the cost principles.

### ***Determining Allowable Costs***

Framework for analyzing allowable costs-

Federal grant programs are governed by a variety of federal rules including statutes, regulations, and non-regulatory guidance. To determine whether a cost may be paid with federal funds, i.e. whether the cost is permissible, staff must first be familiar with these rules and how they work together.

Generally, when analyzing whether a particular cost is permissible, it is useful to perform the following analysis:

- Is the cost forbidden by federal laws such as EDGAR?

- Is the cost permissible under the relevant federal program?
- Is the cost consistent with the federal cost principles in EDGAR?
- Is the cost consistent with the program specific fiscal rules?
- Is the cost consistent with an approved program plan and budget, as well as any special conditions imposed on the grant?

While there are other important considerations that school system staff must take into account when analyzing whether a specific proposed cost is permissible, the above questions can provide a useful framework for the analysis.

#### *Unallowable Costs-EDGAR*

EDGAR identifies certain costs that are unallowable to be paid with federal funds. The following list provides examples of such costs. If a cost is on the list, it may not be supported with federal funds. The fact that a cost is not on this list does not mean it is necessarily permissible.

#### Costs that are unallowable under EDGAR:

- Advertising and public relations costs (with limited exceptions), this prohibition includes promotional items and memorabilia, including models, gifts, and souvenirs
- Alcoholic beverages
- Bad debts
- Contingency provisions (with limited exceptions)
- Donations and contributions
- Entertainment costs
- Fines and penalties (with limited exceptions)
- Fundraising and investment management costs (with limited exceptions)
- General government expenses (with limited exceptions pertaining to Indian tribal governments and Councils of Governments (COGs))
- Goods or services for personal use
- Lobbying
- Selling and marketing costs (with limited exceptions)
- The use of funds for religion
- The acquisition of real property (unless specifically permitted by programmatic statute or regulations which is very rare in federal education programs)

- The use of funds for construction (unless specifically permitted by programmatic statute or regulations which is very rare in federal education programs)
- Charging tuition or fees collected from students toward meeting matching, cost sharing, or maintenance of effort requirements of a program

### ***Program Allowability***

Any cost paid with Federal education funds must be permissible under the federal program that would support the cost.

Many federal education programs detail specific required and/or allowable uses of funds for that program. Issues such as eligibility, program beneficiaries, caps or restrictions on certain types of program expenses, and other program specific requirements must be considered when performing the programmatic analysis.

Some federal programs do not contain a “use of funds” section delineating the allowable uses of funds under those programs.

### ***Federal Cost Principles***

EDGAR defines the parameters for the permissible uses of federal funds. While there are many requirements contained in EDGAR, it includes five core principles that serve as an important guide for effective grants management. These core principles require all costs to be:

- **Necessary** for the proper and efficient performance or administration of the applicable program.
- **Reasonable** expenditure(s) in terms of amount used, needs of the program, and requirements of the program.
- **Allocable** to the federal program that paid for the cost(s). The program must benefit in proportion to the amount charged to that program.
- **Records** and methods used to determine the allocation should be kept and made readily available for Federal, State, and/or Local review.
- **Authorized** under state and local rules. All actions carried out with federal funds must be authorized and not prohibited by state and local laws and policies. When in doubt, it is best to act according to the most restrictive rules.
- **Adequate Documentation** is a must. Proper documentation provides evidence to monitors, auditors, or other oversight entities of how the funds were spent during the pertaining period of availability.

EDGAR also contains specific rules on selected items of costs. Costs must comply with these rules in order to be paid with federal funds.

### ***Program Specific Fiscal Rules***

All Federal education programs have certain program specific rules on selected items of costs. Rules such as supplement, not supplant, maintenance of effort, comparability, caps on certain uses of funds, etc. must also be taken into consideration when determining allowable costs.

Many state-administered programs require LEAs to use federal program funds to supplement state and local funds.

### ***Approved Plans, Budgets and Special Conditions***

As required by EDGAR, all costs must be consistent with approved program plans and budgets. This includes the BCS Consolidated Application to the GaDOE and school-level plans such as school-wide plans or federal school improvement plans.

**Costs must be consistent with all terms and conditions of Federal awards, including any special conditions imposed on BCS grants.**

### ***Supplement, Not Supplant for Federal Requirement***

Federal Fund expenditures are supplemental to schools' budgets. Personnel funded whole or in part by federal funds are in addition to the number of personnel required to meet maximum class size as determined by GaDOE. Federal funds are only used to supplement and, to the extent practical, increase the level of funds that would, in the absence of federal funds, be made available from non-federal sources for the education of students participating in federal fund programs. Federal funds are not used to take the place of (supplant) local, state, or other federal funding and are not provided to participating federal fund children when the same services are provided to non-federal fund children with non-federal funds.

### **Procedures for Receiving Ordered Items and Payment of Vendors:**

1. Shipping
  - a. All technology items are shipped to the ECSS Maintenance and Operations Department where the Inventory Specialist checks the items against the packing slip, inventories the items, signs off on the purple PO form, sends the form and the packing slips to the Bookkeeper at the central office, and contacts the school or department to pick up the items and a copy of the packing slip.
  - b. All non technology items are shipped directly to the school or department that made the initial request.
2. Once items arrive at the school or department that made the order, the purchasing administrator checks the items against the packing slip, signs off on the pink PO and sends it to the Bookkeeper at the central office.

3. Upon receipt the signed packing slips verifying that all ordered items have been received, the Bookkeeper checks the invoice and the purchase order for discrepancies and then sends the entire expenditure package to the Superintendent for approval for payment.
4. Upon approval of the expenditure package by the superintendent, the Bookkeeper completes the payment to the vendor.

### **Methods of Procurement**

House Bill 489 states that any goods or services valued at \$10,000.00 or more must be posted on the Georgia Procurement Registry.

Any purchases of \$10,000.00 or greater should be sent to Angie Shaw with the following information included:

- Goods or services desired
- A detailed description
- What date it is needed
- Dollar value not to exceed

Angie will post these to the GPR and accept the bids. Once the bid expires, a vendor decision will be made based on quality and price.

Any physical services provided over \$2,500.00 must have an E-Verify affidavit before payment.

If you have any questions, please contact Angie at [angela.shaw@emanuel.k12.ga.us](mailto:angela.shaw@emanuel.k12.ga.us) or 478-237-6674 ext. 103.

### **Conflict of Interest**

Emanuel County School System general conflict of interest policies for staff and board members are outlined in BOE Policies [BH](#), [BHA](#), and [GAG](#).

Employees or agents of Emanuel County Schools must not participate in the selection, award, or administration of a contract supported by a Federal award if that employee has a real or apparent conflict of interest such as, but not limited to, an immediate family, 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.

Employees and agents of Emanuel County Schools must neither solicit nor accept gratuities, favors, or anything of monetary value from contractors or parties to subcontracts. However, this policy does not prohibit acceptance of small gifts valued under \$100.

Failure to adhere to this policy will result in disciplinary action which may include but not limited to: PSC referral (if applicable), reprimand, suspension, termination, and/or filing of criminal charges (if applicable).

Violations of the conflict of interest policies and procedures should be reported to the Superintendent.

### **Travel**

Conferences, workshops, and training attended by system staff and funded with federal grants must support ongoing initiatives that are outlined in the CLIP and/or support grant administration, and must adhere to program requirements and be compliant with Uniform Grant Guidance. All travel funded with federal grants must be pre-approved by the grant manager using the procedures below:

Emanuel County Schools adheres to the Georgia State Accounting Office State Travel Policy found at <https://sao.georgia.gov/>.

### ***Employee Expense Statement***

**All employees must submit their Expense Statement through Doc-e-fill and attach all required receipts.** The Employee Expense Statement must have the following completed: Correct home mailing address, Date, From/To, Purpose of Travel, Departure/Arrival times (to and from your destination only for travel where meals are being reimbursed), Correct account numbers and appropriate approval. Receipts for applicable lodging, registration and other expenses must be attached in pdf format. Expense statements paid from federal funds must submit an agenda from the event included in their documentation. Employees should submit all expense reimbursements ideally by the following month of when the expense occurred. **IRS guidelines state that any expense not submitted within 60 days of the expenditure becomes taxable income to the traveler. Any reimbursement submitted after the 60 Day Rule will be reimbursed through payroll.**

Travelers are expected to exercise good stewardship of funds when traveling on official state business. The overall specific business purpose of any reimbursement must be clearly stated on the Employee Expense Statement. Employees are responsible for ensuring that all expenses claimed on the Expense Statement are proper, accurate, and incurred when on official business. Employees are responsible for completing their own expense reports.

### ***Signatures:***

- Original signatures are required from the employee claiming travel costs, from his/her direct supervisor, and/or if the travel involves federal assistance/grant funding, from the program director.
- Employee signature signifies agreement with the attest statement included on the Employee Travel Expense Statement (claims are accurate and valid).
- Supervisor and/or grant director signature indicates that expenditures listed have been reviewed and approved, and that the account number listed reflects the correct funding source and the sufficiency of funds.

### **Meals**

Meals are not reimbursable unless the employee is on official travel status for MORE than 12 hours.

Day of Departure:

- Breakfast is reimbursable if the employee departs prior to 6:30 a.m. The noon meal is reimbursable if the employee departs before 11:00 a.m. The evening meal is reimbursable if the employee departs before 5:30 p.m.

Day of Return:

- Breakfast is reimbursable if the employee returns from an overnight trip after 6:30 a.m. The noon meal is reimbursable if employee returns after 1:30 p.m. The evening meal is reimbursable if the employee returns after 7:30 p.m.

You must state departure/return times for meal reimbursement to be processed. The meal reimbursement rates are:

- Breakfast \$13.00
- Lunch \$14.00
- Dinner \$23.00

Total Daily Meal Reimbursement Allowed: \$50.00

Receipts for meals are not required: however, only actual expenses should be claimed. Handwritten receipts must also have a copy of the cancelled check, credit card receipt, etc.

### **Airline**

The State will reimburse for the cost of coach airfare only. Travelers on State business should always select the lowest priced coach airfare. Business and first class tickets are not reimbursable for flights. Travelers who are combining personal travel with business travel may only do so when the personal portion does not add any cost to the State. ALL travel arrangements must be made to accommodate the business duties of the traveler and not personal preference. In the event there is a charge for checking luggage, the state will reimburse for a maximum of 1 piece of checked luggage.

## ***Lodging***

Employees should always look for the most reasonable rate when making a hotel reservation. Reimbursement will be made for actual lodging expenses with and **original itemized paid receipt showing each day's lodging**. The maximum reimbursement rate is **\$250.00 per room per night**, regardless of the number of employees sharing the room. This includes the State Tax charge. Any exceptions must have PRIOR written approval from the employee's supervisor.

An employee that determines lodging will be more than \$250 per room per night, must have the supervisor approve the cost prior to the event. The employee must provide evidence that no rooms blocked off for events at the conference rate were available within a reasonable distance from the venue.

**Employees are expected to pay for their individual travel only.** When sharing a room, each employee should pay for their portion of the room at check-out. When checking in, please notify the hotel of each employee so that the paid receipt will have the correct employee's name.

Charges such as movies, personal phone calls, and lodging exceeding the days of the conference are not reimbursable.

At time of check-in, be sure to present the place of lodging with a Certificate of Exemption of Local Hotel/Motel Excise Tax form so that the hotel will exempt you from the Local/Occupancy Taxes. State on expense statement if the hotel/motel will not accept the tax exempt form. **Only State of Georgia taxes are reimbursed.** When traveling out-of-state, taxes are not exempted; therefore, all taxes will be reimbursed. Lodging must be listed on your expense reimbursement per night.

## ***Rental Cars***

Rental cars will not be reimbursed if being utilized for personal use.

### ***Child or Dependent Care***

We do not provide dependent care.

## ***Mileage***

You may only claim mileage that is for official, required school business. Mileage for meetings within Emanuel County is not reimbursable unless the employee is required to be in attendance. Normal (personal) commuting miles may not be reimbursed, unless during a school break.

## ***Residence***

The place where you personally reside. Mileage between your home and your primary work station is normal (personal) commuting expense.

### ***Temporary Work Station***

Meeting sites away from the primary work station.

### ***Commuting Miles***

Mileage traveled by State travelers between their residence and primary workstation is considered commuting miles. Normal commuting miles must be deducted when calculating total mileage reimbursement. Statement must state normal commuting miles have been deducted. Ex: Employee's normal commute is 15 miles one-way. Employees travel from home to an out of town location for a total of 100 miles. At the end of the day, the employee drives home. The employee's business miles traveled are 70 (100 actual miles minus the 30 commuting miles).

### ***Other Expenses***

A receipt must be attached if you are claiming any other expenses. This would include registrations, parking fees, shuttle/taxi fees, baggage fees, books purchased, etc. Portage may not be used for mere convenience, but only if the employee is physically unable to carry his/her own luggage, explanation required on statement. Receipt can be only for reimbursable items, **NO PERSONAL ITEMS ON THE SAME RECEIPT.**

### ***Employee Expense Statement***

**All employees must submit their Expense Statement through Doc-e-fill and attach all required receipts.** The Employee Expense Statement must have the following completed: Correct home mailing address, Date, From/To, Purpose of Travel, Departure/Arrival times (to and from your destination only for travel where meals are being reimbursed), Correct account numbers and appropriate approval. Receipts for applicable lodging, registration and other expenses must be attached in pdf format. Expense statements paid from federal funds must submit an agenda from the event included in their documentation. Employees should submit all expense reimbursements ideally by the following month of when the expense occurred. **IRS guidelines state that any expense not submitted within 60 days of the expenditure becomes taxable income to the traveler. Any reimbursement submitted after the 60 Day Rule will be reimbursed through payroll.**

Travelers are expected to exercise good stewardship of funds when traveling on official state business. The overall specific business purpose of any reimbursement must be clearly stated on the Employee Expense Statement. Employees are responsible for

ensuring that all expenses claimed on the Expense Statement are proper, accurate, and incurred when on official business. Employees are responsible for completing their own expense reports.

Role of the Approver-The approver is attesting that he/she has thoroughly reviewed each transaction and the supporting documentation, and has verified that all transactions are allowable expenses according to the regulations. Upon granting approval of expense submissions, approvers are certifying:

- Appropriateness of expenditure, reasonableness of the amount, and that all travel regulations have been followed.
- Availability of funds and that reimbursement is being charged to the correct account number(s).
- Completeness and accuracy of all documentation and that all required receipts/backup have been submitted.

All travel expense reports are reviewed for accuracy and completion by the appropriate supervisor and/or program director. Incorrectly completed travel expense reports are returned to the employee for the appropriate revisions. Reviewed and approved travel expense reports are submitted to the Finance Department (Accounts Payable) for reimbursement check processing.

### **Stipends**

Stipends may be paid out of federal funds to system staff attending professional development sessions during non-contract time (or after regular hours) that are aligned with initiatives outlined in the CLIP and/or support grant administration, and adhere to program requirements and are compliant with Uniform Grant Guidance. Payment of stipends funded with federal grants must be approved by the federal grant manager. Stipends will be paid at a rate of \$100 per 8 hrs of seat time or \$50 per 4 hours of seat time. Stipends will not be paid for training that is less than 4 hours in one day's session. Stipends will be paid only after training is completed and there is evidence that the knowledge, skills, practices, and dispositions developed through participation in or facilitation of professional learning have been implemented, demonstrated, or verified.

### **Summer School and After School Tutoring Pay**

Pay will be determined based on the hourly rate of the teacher except when circumstances such as a pandemic or lack of teacher interest require the system to pay teachers a more elevated rate. During the two years following the pandemic it was determined that the pay would be \$50 per hour in order to compensate teachers for their service during this time of national emergency.

### **Retention Incentives**

Retention Incentives are awarded to staff to encourage employees to maintain their positions within the district during a national emergency. ESSER funds can be used to provide these incentives to current staff.

### **Time and Effort Documentation for Federally Funded Positions**

Time and effort documentation is required for **all** federally funded employees. This includes **teachers, instructional coaches, paraprofessionals, teachers that perform after school tutoring duties, contracted tutors, substitute teachers, bus drivers, administrators, and administrative support staff**. Generally, Periodic Certifications will be maintained for fully funded positions, monthly schedules for split funded personnel with an approved fixed schedule, and time logs for split funded personnel with variable schedules.

### **Periodic Certification Procedures**

Periodic certification is required when LEAs use federal funds to pay employees' compensation. When LEAs pay employees' compensation using one federal grant (for example, Title I Part A) those employees must sign a form called a "periodic certification". Periodic certification must be completed at least annually after the work period has ended. It is important to note that the periodic certification is applicable for School-wide programs if the employee is paid completely out of Title I School-wide program funds.

All employees in the Emanuel County School System whose salaries are paid 100 percent from Title I funds, or their direct supervisor who has first hand knowledge of the work performed by the employee will sign the annual periodic certification form each year after the work period has been completed. All periodic certifications must be turned in to the Federal Programs Director by June 1 and kept on file for documentation.

The following outlines specific procedures for completing period certifications in different employee categories:

- Teachers, Instructional Coaches, Paraprofessionals, Administrators, Administrative Support Staff
  - The Federal Programs Director (Director) or designee will cross reference the appropriate approved Federal Budget budget with the appropriate monthly detail expenditure report and monthly payroll reports to determine names and assignments of all employees that are fully federally funded.
  - The Director or designee will enter the names and assignment information of the employees on either the [Multiple Employee Periodic Certification Form](#) or the [Individual Employee Periodic Certification Form](#) and send it to the employee's supervisor to be completed. Each form includes directions for completion.
- Teachers Performing After-School Tutoring, Contracted Tutors
  - The Federal Programs Director (Director) or designee will cross reference the appropriate approved Federal Budget budget with the appropriate monthly detail expenditure report, timesheets submitted to payroll, and

- monthly payroll reports to determine names and assignments of all tutors paid with federal funds.
- The Director or designee will enter the names and assignment information of the tutors on either the [Multiple Employee Periodic Certification Form](#) or the [Individual Employee Periodic Certification Form](#) and send it to the employee's supervisor to be completed. Each form includes directions for completion.
  - Substitute Teachers
    - The Director or designee will cross reference the appropriate approved Federal Budget budget with the appropriate monthly detail expenditure report, monthly payroll reports and AESOP Title I Sub. and Professional Learning reports to determine names of all substitutes that were paid with federal funds and to re-verify that all were for allowable personnel and activities.
    - The Director or designee will enter the names of the substitutes on the [Multiple Employee Periodic Certification](#) form, complete required information, and attach supporting documentation if necessary (leave forms/AESOP reports) and send to the principal of school the to be signed. Each form includes directions for completion.
  - Bus Drivers -
    - The Federal Programs Director (Director) or designee will cross reference the appropriate approved Federal Budget budget with the appropriate monthly detail expenditure report, timesheets submitted to payroll, and monthly payroll reports to determine names and assignments of all bus drivers paid with federal funds.
    - The Director or designee will enter the names and assignment information of the bus drivers on either the [Multiple Employee Periodic Certification Form](#) or the [Individual Employee Periodic Certification Form](#) and send to the Transportation Director to be completed and signed. Each form includes directions for completion.

## **Split Funded Personnel**

If the LEA pays employees from more than one funding source (for example, State QBE, Title I Part A and Title II Part A), the employees must complete a time log or provide a schedule that is the same throughout the year. Time logs must be completed at least once per month. A Google Sheets version of the time log will be shared with the employee and supervisor by the Federal Programs Director. Time log must be filled out each month, printed and signed by the employee after the end of the month, and forwarded to the Federal Programs Director. The Federal Programs Director will review the timelog, make requests for clarification or revision if needed and after approval, will forward a copy to the Director of Finance who will make payroll adjustments if needed.

If an employee's schedule has been approved and does not change, the schedule may be printed out and signed in lieu of a time log. The Federal Programs Director will work with each principal to develop copies of teachers' schedules that may be printed, signed, and forwarded to the Federal Programs Director. If an employee has a job description that is approved by Title IA and Title IIA, a periodic certification will be submitted for the split funded employee.

## **Federal Programs Equipment Inventory Procedures**

### **INVENTORY AND PROPERTY MANAGEMENT**

Emanuel County School District maintains a federal inventory for items purchased with a single item unit cost of \$10,000 or greater for items purchased on or after July 1, 2025, and items with a single item unit cost of \$5,000 or greater for items prior to July 1, 2025. Each school is responsible for maintaining these inventoried items.

Note: ECS should always have effective control over and accountability for all funds, property, and assets as we safeguard all assets and ensure they are used solely for authorized purposes (2 CFR 200.302(b)(4)) to ensure accountability for equipment, an item will be recorded in the online inventory system and checked out to the equipment user for its intended purpose. The inventory maintained within the software platform will be accessible by the Federal Programs Director. Each school is responsible for maintaining these inventoried items.

- I. Acquisition of equipment
  - A. Requisition for all equipment are entered into accounting software program at the school level. The requisition must show in the notes section the goal and action step from the school improvement plan to justify the purchase. The requisition is approved by the building principal, then the federal programs director, and finally the assistant superintendent. A purchase order is generated and the accounting department places the order for the approved items.
  
- II. Technology Equipment
  - A. Technology equipment (i.e. computers, printers, computer accessories, tablets, projectors, interactive products, etc.) shall be received and prepared for the school by the Technology Department to ensure purchased technology equipment is compatible with existing programs and systems. Information for all equipment must be entered and prepared for circulation within 45 days of receiving equipment.
  - B. Technology Department personnel will be responsible for:
    1. tagging the purchased items with a numbered inventory identification tag provided by the federal programs department and

with a numbered barcode from the school designated to receive the equipment.

2. entering the item in the Hayes software system to include:
  - a) System Tag Number
  - b) Serial Number
  - c) Product Name
  - d) Manufacturer
  - e) Site Name
  - f) Product Type
  - g) Location
  - h) Status
  - i) Vendor
  - j) Funding Source
  - k) % Federally Funded
  - l) Purchase Date
  - m) FAIN
  - n) Purchase Price
  - o) Use
  - p) Condition
  - q) Disposal Date
  - r) Sale Price (If Applicable)
3. updating the inventory information when an item is relocated or disposed
4. documenting and communicating the removal of technology equipment for repair with the principal's inventory designee

I. Off-site use of equipment

System employees may use equipment off-site that has been properly checked from the school media center when it is being used for educational purposes. The employee is responsible for reporting any damage that might occur while the item was checked out.

II. Items other than technology equipment

A. The principal's designee will be responsible for:

1. tagging any non-technology equipment item with a numbered inventory identification tag upon receipt at the school.
2. entering the item in the school's inventory database to include at a minimum:
  - a) serial number (if applicable)
  - b) manufacturer/vendor
  - c) description purchase order number
  - d) purchasing fund
  - e) any changes in location/user

- f) inventory tag number
    - g) model number
    - h) purchase date
    - i) item cost
    - j) building/location/user
    - k) disposed status if item get disposed
    - l) award number (FAIN)
  - 3. notifying the technology dept. of any technology equipment delivered to the school in error.
  - 4. checking out portable technology equipment to staff members.
- III. An Inventory Record/Database Including Technology & Non-Technology Items
  - A. The principal's designee will be responsible for maintaining a complete inventory record that includes both technology equipment based on the information included in the Technology Department's inventory records and non-technology equipment received at the school location.
  - B. The LEA's Title I Director/Designee will work with the principal's designee in accessing the information in the Technology Department's inventory database/records.
- IV. Annual Physical Inventory
  - A. The media specialist/principal's designee at each school will be responsible for completing a physical inventory at the end of each school year. The Parent Resource Manager completes the inventory for the resource room/district office equipment.
  - B. The physical inventory will be compared and reconciled with the inventory records maintained by each principal's designee and purchase information maintained at the LEA by the Federal Programs Director/Designee.
  - C. A copy of the reconciled physical inventory records will be maintained at each school location.
  - D. Each year, between February and the end of the fiscal year, the Federal Programs Director and Technology Project Manager conducts a physical inventory of all equipment purchased with Federal funds, reconciles the results with inventory records, updates the records to ensure the inclusion of all equipment, and signs off that the physical inventory review has been conducted.
  - E. Annual inventories shall be maintained for five years.
- V. Maintenance of Equipment
  - A. Equipment will be maintained on the inventory using the Smartfusion/TipWeb/Hayes software for the life of the equipment. If the equipment is "repurposed" or "missing" it will be indicated using a field in the program software.

- B. The equipment will be stored properly and maintained in the school media center by the media specialist or principal's designee. Items will be reviewed when checked out and again when they are checked back into the media center to make sure they are in proper working order and have been maintained properly. Damaged items are reviewed by the technology department to decide if a repair is indicated or if the item is beyond repair. If possible the item will be repaired and returned to the school for use. The technology department can determine if an item cannot be repaired if there are parts on the item that can be used to make repairs on other equipment. When an item is no longer able to be used, the technology department will update Hayes/TipWeb Software to indicate the date of disposal.

VI. Missing/Stolen Equipment

- A. Equipment that is missing or stolen shall be reported to the Federal Programs Director/Designee immediately.
- B. When an item is reported as missing, an Emanuel County Inventory Irregularity Report must be completed, and a copy of the report sent to the Federal Programs Director/Designee.
- C. A report to law enforcement must be filed within 2 days of an item being reported as stolen, and a copy of the report sent to the Federal Programs/Designee.
- D. The school is responsible for informing the technology department of the condition of the equipment.

VII. Broken, Out of Date, No Longer Needed Equipment.

- A. Equipment, valued at less than \$5000, that is broken, out of date, and/or no longer needed must be recorded on the inventory record as "Disposed" or "Repurposed" indicating the date and reason for disposal, and disposition of the disposed item. Once a piece of equipment that was purchased with federal funds is no longer being used or capable of being used for its originally intended purpose, it may be repurposed to another federal program. If the equipment is not needed or usable by another federal program, it may be designated as surplus. Once designated as surplus, the item can be used for a different purpose outside of federal program guidelines.
- B. Such equipment may only be disposed of after receiving authorization from the principal and Federal Programs Director. Date of permission shall be recorded on the inventory record.
- C. Equipment that is valued at greater than \$5000 and is out of date and/or no longer needed may be retained or sold. The awarding agency has rights to the state's share at \$500 or 10-percent of sale.

VIII. Use of Title I Equipment in Targeted Assistance School

All Emanuel county schools are School-Wide Title I schools. In the event that a school would become a Targeted Assisted school or a new school opened that was a Targeted Assistance (TA) school, all procedures mentioned here apply. All equipment purchases (i.e. computers, printers) by participating TA schools are to be used only by Title I teachers, eligible Title I students and eligible parents. A list of the Title I students and their parents must be available to ensure that the equipment is only used by these students and parents.

Any equipment purchased with Title I, Part A funds must be reasonable and necessary to implement a properly designed program for participants. However, under some circumstances, equipment purchased as part of a properly designed Part A program may, without constituting an improper expenditure, be used on a less than full-time basis. That equipment could be made available for other educational uses without interfering with its use in the Part A program. Equipment could be used on other projects or programs currently or previously supported by the Federal Government, "providing such use will not interfere with the work on the projects or programs for which it was originally acquired." LEAs should be judicious in applying these standards. Absent actual evidence to the contrary, the standards will have been presumed to be met and the use of Part A equipment in non-Part A activities is proper if use does not exceed 10 percent of the time the equipment is used in Part A activities. However, use above that amount in non-Part A activities is not necessarily improper if the standards are met on a case-by-case basis. The use of Title I equipment in Targeted Assistance Program schools in non-Title I activities on a part-time basis must be done in a manner that protects the integrity of the equipment as a Title I expenditure. Accordingly, the LEA must ensure and document that:

- The Title I equipment is part of a project that has been properly designed to meet the special educational needs of educationally deprived children.
- The equipment purchased with Title I funds is reasonable and necessary to operate the LEA's Title I project without regard to any use in non-Title I activities;
- The project has been designed to make maximum appropriate use of the equipment for Title I purposes; and
- The use of the equipment in non-Title I activities does not decrease the quality or effectiveness of the Title I services provided to Title I children with the equipment, increase the cost of using the equipment for providing those services, or result in exclusion of Title I children who otherwise would have been able to use the equipment.

In the absence of evidence to the contrary, it will be presumed that these standards have been met and that use of Title I activities is proper if that use does not exceed 10 percent of the time the equipment is used in Title I activities, provided the equipment is not needed in the Title I program. Permissive use of the equipment for

one period of the day is allowable, if it is not needed by Title I. Before and after school use is acceptable if Title I does not need the equipment. Care should be taken that the equipment is properly supervised, that use will not affect the integrity of the equipment, that the Title I program is not compromised, and that users will assume all responsibility for any and all damage to the equipment.

IX. Use of Title I Equipment in Participating Private Schools

In the event that Emanuel County Schools had participation in federal programs from private schools and that participation involved use of federally funded equipment the inventory procedures outlined in the document will be adhered to in order to ensure proper maintenance and safeguarding of equipment. The federal programs director would consult with the director or designee of the private school to develop a plan to check out and monitor the appropriate use of equipment used in the private school.

X. Each Principal shall be responsible for:

- A. the implementation and dissemination of this procedure to all staff at his/her school.
- B. instilling the importance of accountability and care for school property with all school personnel.
- C. holding school personnel accountable for communicating equipment moves within the building to the principal or the principal's inventory designee.

XI. The Technology Director shall be responsible for:

- A. the implementation of this procedure as related to the Technology Department and its staff.
- B. ensuring that the Technology Department staff maintain an accurate, up-to-date technology inventory database as indicated in these procedures.

## **Programmatic Requirements**

### **Title I**

#### **School Wide Schools**

All schools in the Emanuel County School district are School-Wide Title I Schools. A Title I schoolwide 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 standards. Under the ESEA section 1114(a)(1), as amended by ESSA, Emanuel County operates a schoolwide program because more than 40% of the students in each school live in poverty.

This schoolwide reform strategy requires a Emanuel County Schools to:

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

### **Targeted Assistance Schools/Targeted Assistance Like Programs**

There are no Targeted assistance schools in the Emanuel County School. However, if a new school opened that did not meet the requirements for a Title I Schoolwide program, the District would determine if Title I funds should be utilized to develop a Targeted Assistance program to serve the students of greatest need in that school.

Eligible children would be identified by the school as failing, or most at-risk of failing, to meet the Georgia Department of Education's (Department's) challenging student academic achievement standards on the basis of multiple, educationally related, objective criteria established by the LEA and supplemented by the school. "Multiple" means more than one, so it would not be appropriate to base eligibility on the score from a single test. The term "educationally related" means that there must be an academic component to the criteria. The term "objective" means that the criteria must not be based on teacher judgment or other subjective means.

Each targeted-assistance Title I school would create a plan to assist the school and local educational agency to meet its responsibility to provide for all students identified and served in the targeted-assistance program the opportunity to meet the state's challenging student academic achievement standards in subjects as determined by the state.

Detailed programmatic and fiscal records must be maintained to document that Title I, Part A funds are spent on activities and services for only Title I, Part A participating students, their parents, and the teachers of the identified students.

In some cases a Title I School-Wide School may develop programs to serve groups of students that are failing or at-risk of failing to meet the Georgia Department of Education's (Department's) challenging student academic achievement standards. The district and the school would develop multiple, educationally related, objective criteria to determine student eligibility for the program. The school created a plan to assist the school and local educational agency to meet its responsibility to provide for all students identified and served in the targeted-assistance like program the opportunity to meet the state's challenging student academic achievement standards in subjects as determined by the state.

## **Comparability of Services**

Comparability is achieved through the use of two forms of documentation: the October FTE count for the current year and the payroll distribution report. The state comparability report provided by the Georgia Department of Education will be used to report the appropriate numbers to GADOE. The total number of non-federal employees that are to be included per payroll distribution codes will be counted and placed in the comparability report also provided by Title I, which will automatically calculate comparability. The enrollment numbers submitted for comparability from the October FTE count with the exclusion of prekindergarten enrollment will be used. Using the student/instructional staff ratios to compare the average number of students per instructional staff in each Title I school with the average number of students per instructional staff in non-Title I schools, comparability will be achieved when High Poverty Attendance Area Schools averages do not exceed 110 percent of the Low Poverty Attendance Area Schools. The following will be included in the count: instructional teachers and support personnel, instructional paraprofessionals, music, art, and physical education teachers, guidance counselors, speech therapists, media specialists, school social workers and psychologists. No federally funded personnel or Pre-kindergarten personnel will be included in the count; only state and local paid staff are counted. High Poverty Attendance Area Schools will be compared to Low Poverty Attendance Area Schools. Comparability will be determined and established by December 1 of each year. Steps to completing comparability will include:

1. Request CPI Report 12 and 13 (certified staff and non-certified staff) from Finance after the report has been submitted to GaDOE (usually in October). This is source documentation and must be used for this report. This report is found on the Consolidated Application. Export the names of all staff and set-up spreadsheet to count all staff members at each individual school.
2. Pull Oct FTE count from GaDOE website.
3. Once the report is received, strike out or highlight everyone that is not 00.
4. Count all staff not highlighted
5. Count these numbers up. Make sure to have an additional person double check these numbers.
6. Careful examination of staff members that are split-funded
7. Go to GaDOE and pull up the latest forms for comparing Title I and Non-Title I schools.
8. Pull the Oct FTE report to fill out the signature page for the report.
9. Do not count pre-K
10. Submit for superintendent's signature
11. Submit to GaDOE area specialist electronically and put a hard copy in mail to GaDOE as well.

## **Maintenance of Effort**

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

## **Set Asides**

### **Parent and Family Engagement Set Aside**

Each year in the spring needs assessment, stakeholders (including parents) are surveyed to gain input on how the district should spend the 1% set aside for parental involvement. Parents can participate in the spring survey for 1% and CLIP by paper survey or by electronic survey posted on the District and School websites. Input is also gained from district and school parent involvement activities and programs. Results of the survey and feedback from meetings is analyzed by the Federal Programs Director and Parent Involvement Coordinator to determine how the 1% set aside will be allocated in the budget. The federal programs director and school principals consult each year using parent input and other data to determine if the parent and family set aside will be expended at the school level or pooled for a district activity. If pooled to fund a district level parent involvement activity/project a District-wide Parent Activity Project Assurance form will be completed and signed by the principals directing funds back to the district.

### **Parent and Family Engagement Set Aside Carryover**

Each year during the preparation of the Title I carryover budget, the federal programs director reviews the previous year’s completion as well as the previous two year’s budgets to determine the required 1% from the previous year, the carryover amount from 2 years prior, and the prior year’s Family Engagement expenditures. These values are entered into an excel spreadsheet that calculates carryover amount for the prior year (previous year’s parent engagement expenditures subtracted from the sum of the required set aside from the previous year and the carryover amount of 2 years prior). This spreadsheet is uploaded to the DOE Consolidated Application with the Title I carryover budget.

### **Homeless Set Aside**

Because of the generosity of many of Emanuel County’s local organizations, very few supplies are needed for homeless children and youth each year. Children and youth experiencing homelessness are automatically eligible for Title I, Part A services, regardless of the school they attend, as all Emanuel County Schools are Title I schools. The trauma and instability of homelessness places students at risk of academic

regression to warrant additional support. The district shall reserve such funds as are necessary to provide services to children and youth experiencing homelessness that are comparable to those provided to Title I, Part A students. The amount reserved shall be determined by the homeless liaison by using **Method 1: Identify the homeless students' needs and fund accordingly**. The amount reserved will be approved by the Federal Programs Director. Reserved funds will be used to provide emergency school supplies in case of disaster (notebooks, writing utensils, dress code approved clothes, eyeglasses) and short term/emergency transportation to school of origin.

### **Neglected and Delinquent Set Aside**

The reservation amount provided by GaDOE in the Title I, Part A allocation letter and worksheet is the amount set aside for neglected or delinquent children. This amount is determined each year by the completion of the Annual Survey of Neglected and Delinquent Institutions which is sent to all Neglected and Delinquent facilities in the geographic boundaries of the LEA each year in the fall. There is one neglected facility, AMIKIDS Savannah River located in Emanuel County. The federal programs director and the director of the neglected facility consult early in the school year and throughout to determine how to best serve the academic needs of the students attending the facility.

### **Private School Proportionate Share Set Aside**

There are currently no private schools participating in federal programs in Emanuel County. If a private school did choose to participate, equitable services would be provided to that private school. Funds would be identified in the district set aside portion of the consolidated application. The school would receive an equitable amount from reservations of funds for instructional and related activities before allocating funds to public schools. Equitable services would be calculated from the GaDOE worksheet. The amount would be proportionate to the number of private school children from low-income families residing in Title I participating public school attendance areas.

### **Procedures for Review and Approval of all Title I Plans and Budgets**

Guidance is provided to schools and other departments regarding the requirements and timelines for submission, revision, and final edits of School Wide Plans, Parental Involvement Plans, and the CLIP. This guidance is provided through technical assistance meetings, e-mails, and ongoing phone conversations.

District and School Leadership and Focused Improvement Teams at each school are responsible for the initial development of school based Title Program Plans.

Stakeholders including all Parents, Teachers, Administrators, other staff and community members are provided the opportunity for input in all Title Program Plans through

district-wide stakeholder meetings, School Council Meetings in the Spring of the year prior to the plan year as well as Parent Nights at each school, District Parent Nights, and through surveys.

The Federal Programs Director reviews each School Wide and Parental Involvement Plan utilizing the appropriate Georgia Department of Education checklist. The CLIP is reviewed utilizing annual guidance including the CLIP Reminder Checklist and powerpoints from the Georgia Department of Education.

If a School Wide Plan or Parental Involvement Plan does not meet the Georgia Department of Education checklist requirements, the Federal Programs Director provides written guidance to each building principal regarding the requested revisions, including the deadline for resubmission. Once re-submitted, the Federal Programs Director again reviews the School Wide or Parental Involvement Plan to ensure changes have been made.

If the CLIP is unapproved by the Georgia Department of Education, the system or program director makes the necessary changes in a timely manner and resubmits for approval.

### **Notice to Parents of English Learners Participating in Title I or Title III Supplemental Language Programs**

Emanuel County Schools currently receives Title III funding and/or use Title I funds to provide a supplemental language assistance program to EL students, the system disseminates the Parent Notification of Supplemental Services Letter (1112)(e) (3)(A) ESEA which can be found in multiple languages on the federal programs Family-School Partnership Program website under Parent Notifications. Notice must be given to parents of participating English Learners (ELs) not later than 30 days after the beginning of the school year. For those children who have not been identified as ELs until later in the school year, the LEA shall notify the children's parents during the first 2 weeks of the EL being placed in a supplemental language program funded by Title I or Title III.

The letter must include the following content:

1. the reasons for the identification of their child as an EL and in need of placement in a supplemental language instruction educational program;
2. the child's level of English proficiency, how such level was assessed, and the status of the child's academic achievement;
3. the methods of instruction used in the supplemental language program in which their child is, or will be, participating and the methods of instruction used in other available programs, including how such programs differ in content, instructional goals, and the use of English and a native language in instruction;
4. how the program in which their child is, or will be, participating will meet the educational strengths and needs of their child;

5. how such program will specifically help their child learn English and meet age-appropriate academic achievement standards for grade promotion and graduation;
6. the specific exit requirements for the program, including the expected rate of transition from such program into classrooms that are not tailored for ELs, and the expected rate of graduation from high school (including four-year adjusted cohort graduation rates and extended-year adjusted cohort graduation rates for such program) if funds under this part are used for children in high schools;
7. in the case of a child with a disability, how such program meets the objectives of the individualized education program of the child, as described in section 614(d) of the Individuals with Disabilities Education Act (20 U.S.C. 1414(d)); and
8. information pertaining to parental rights that includes written guidance
  - a. detailing the right that parents have to have their child immediately removed from such program upon their request
  - b. detailing the options that parents have to decline to enroll their child in such program or to choose another program or method of instruction, if available; and
  - c. assisting parents in selecting among various programs and methods of instruction, if more than 1 program or method is offered by the eligible entity.

## **Parental Engagement**

Each Title I school must comply with the legal requirements of NCLB Section 1118, Parental Involvement and must demonstrate evidence of the implementation of required parental involvement activities.

The Federal Programs Director will provide Technical Assistance to schools for the implementation of parental involvement activities and monitor school and district level parental involvement activities using the procedures described in section 7 of this manual.

## **Building Capacity**

Once the perceptual data from the annual parent survey is received and the feedback from the Needs Assessment is prepared, it is provided to principals for use in planning parent-based activities that will be offered during the next school year. These academic activities provide parents with insight on such topics as: curriculum requirements, state standardized tests, standards-based classrooms, homework help, educational resources, how to monitor their child's academic progress and technology.

## **Parent Involvement Plans – District Plan**

The Federal Program Director and the District Parental Engagement Coordinator receive technical assistance on the District Parent Engagement Plan throughout the year at GADOE Parent Involvement Meetings and Webinars. Stakeholder input is asked for at all parent meetings throughout the year on plan feedback forms and all stakeholders are invited to participate in the spring needs assessment to provide input on all federal programs, the District's and the school's Parent Involvement Plan, School-Parent Compact, School Wide Plans, CLIP, and parent activities to increase student achievement. Parents are notified about these opportunities through the Title I Handout that is given out to all students, school websites, flyers sent home in English and Spanish. The District and schools use the comments provided by parents to review and revise System and school level documents.

Each summer, the revised plan is reviewed and discussed at a summer stakeholders' meeting. All parents and school staff are invited to attend. All suggestions for revision are considered before the Federal Programs Director approves the final plan. Once revisions are made based on parent input, the Emanuel County Parental Involvement Plan is copied and sent home with each student, made available to parents on the District website. Copies are also available at the school.

### **Parent Involvement Plans – School Plans**

Throughout the school year, technical assistance is given to the principals and school leadership teams on the school Parent Involvement Plan. Stakeholder input is solicited at all parent meetings throughout the year including School Council Meetings. Feedback and input is documented on plan feedback forms. All parents are invited to participate in person and/or to provide online input. All stakeholders are invited to participate in the spring needs assessment to provide input on all federal programs, the District's and the school's Parent Involvement Plan, School-Parent Compact, School Wide Plans, the CLIP, and parent activities to increase student achievement. Parents are notified about these opportunities through Title I Handouts sent home with each child, local newspaper articles/advertisements, school websites, school marquis, flyers sent home in English and Spanish. The District and schools use the comments provided by parents to review and revise System and school level documents.

The revised plans are sent to the Federal Programs Director. They are critiqued based on the checklist to ensure that all components are included. If revisions are needed, the Director provides written feedback regarding needed changes. The plans are then resubmitted for final approval.

Once revisions are made based on parent input, the school Parental Engagement Plans are copied and sent home with each student, made available to parents on the District website, and translated into Spanish which are also available on the District website. Copies are also available at the schools.

## School-Parent Compacts

Before May 1<sup>st</sup> , the Federal Programs Director, or the Parent Involvement Coordinator will provide technical assistance to the principals or assistant principals, and teacher leaders on the school leadership teams on the School-Parent Compact. The Georgia Family School Partnership Program “Checklist for the School-Parent Compact” document, “Focus Area Suggestions for the Use on the School-Parent Compact” document, and the compact templates will be utilized to train staff on federal and state compact required elements including:

1. A description in family-friendly language how parents are involved in developing and revising the compact
2. District and School SMART goals for the school year
3. A description of the school’s responsibility to provide high-quality curriculum and instruction in a supportive and effective learning environment that enables the children to meet the challenging State academic standards.
4. A description of the ways in which each parent will be responsible for supporting their children’s learning; volunteering in their child’s classroom; and participating, as appropriate, in decisions relating to the education of their children and positive use of extracurricular time.
5. A description of how the school will provide, at least two to three, specific activities/strategies per academic S.M.A.R.T. goal to families, for at home learning, to promote student growth on identified school/grade level academic achievement goals.
6. A description of how the parent/family will utilize strategies provided by the school to support student learning.
7. A description of how students will share responsibility for their learning targets jointly established with their teachers and families.
8. The importance of communication between teachers and parents on an ongoing basis through, at a minimum:
  - a. Parent-teacher conferences in elementary schools, at least annually, during which the compact shall be discussed as the compact relates to the individual child’s achievement.
  - b. Frequent reports to parents on their children’s progress.
  - c. Reasonable access to staff, opportunities to volunteer and participate in their child’s class, observation of classroom activities.
  - d. Ensuring regular two-way, meaningful communication between family members and school staff, and to the extent practicable, in a language that family members can understand. Section 1116(d)(2)(A)-(D)
9. A description of the means by which the school and parents will build and develop a partnership to help children achieve the State’s high standards.
10. How the school will provide reasonable access to staff, opportunities to volunteer and participate in their child’s class, and observation of classroom activities.
11. Revision Date including month, day, and year
12. Signatures with dates from School Representative, Parent, and Student

Compacts are developed in grade level meetings at the elementary school level and in teacher leader meetings at the middle and high school levels. The compacts are sent to the Federal Programs Director. They are critiqued based on the checklist to ensure that all components are included. If revisions are needed, the Director provides written feedback regarding needed changes. The compacts are then re-submitted for final approval.

Once revisions are made based on parent input, the School-Parent Compacts are copied and sent home with each student. Copies are also available at the schools.

Stakeholder input on compact content is solicited through:

- Parent and Community Input meetings in the Fall and Spring
- School Council Meetings throughout the year. All parents are invited to School Council meetings.
- Online input using Google Docs

Stakeholder input is solicited at all parent meetings throughout the year including School Council Meetings. Feedback and input is documented on plan feedback forms. All parents are invited to School Council Meetings. Students are invited to give input through meetings with the parent involvement coordinator; results of these meetings are reviewed and considered at School Council meetings. All stakeholders are invited to participate in the spring needs assessment to provide input on all federal programs, the District's and the school's Parent Engagement Plan, School-Parent Compact, School Wide Plans, the CLIP, and parent activities to increase student achievement. Parents are notified about these opportunities through Title I Handouts sent home with each child, local newspaper articles/advertisements, school websites, school marquis, flyers sent home in English and Spanish. The District and schools use the comments provided by parents to review and revise System and school level documents.

### **On-Going Monitoring**

The Federal Programs Director and the District Parent Involvement Coordinator read and provide feedback to each Title I school on their Parent Engagement Plan and School-Parent Compact as necessary. The schools make adjustments to the Plans and Compact based on suggestions and recommendations. The Parent Involvement and Compact Checklist provided by GaDOE are used as the monitoring instrument for this review.

### **Notification to Parents**

The District follows the guidelines for all required parent notifications according to the guidance set by the Georgia Department of Education regarding School Status, School Improvement status, Public School Choice, Parents' Right To Know, and other required notices. The District establishes timelines annually to ensure the timely dissemination

of parent notifications. These notifications are also provided in a language easily understood by our parents.

Required Activities:

### **Parental Involvement Plan**

1. Develop jointly with, agree on with, and distribute to parents of children a written district and school parental involvement policy. Section 1118 (a)(2) and (b)(1)
2. Involve parents in the joint development of the plan under Section 1112 and the process of school review and improvement under Section 1116. Section 1118 (a)(2)(A)
3. Parents shall be notified of the policy in an understandable and uniform format and, to the extent practicable, provided in a language the parents can understand. Section 1118 (b)(1)
4. The revised and completed school parental involvement policy shall be distributed to parents in multiple ways and be made available to the local community as well as updated periodically to meet the changing needs of parents and the school. Section 1118 (b)(1)
5. If the plan under Section 1112 or the schoolwide program plan is not satisfactory to the parents of participating children, the school shall submit any parent comments with such plan to the LEA. Section 1118 (c)(5)

### **Involve Parents**

1. Involve parents in the activities of the schools served under this part. Section 1118 (a)(2)(F)
2. Convene an annual meeting, at a time convenient for parents, to ensure that all parents of participating children learn about their school's participation in Title I programs, requirements, and the right of parents to be involved. Section 1118 (c)(1)
3. Schools must invite to this meeting all parents of children participating in Title I programs and encourage them to attend. Section 1118 (c)(1)
4. Schools must offer a flexible number of meetings, such as in the morning or evening, so that as many parents as possible are able to attend.
5. Schools shall involve parents in the planning, review, and improvement of Title I programs, including the school parental involvement policy and the Title I schoolwide program plan/school improvement plan.
6. Schools shall provide parents of participating students timely information concerning:
  - a. Description and explanation of the school's curriculum
  - b. Individual student assessment results and interpretation of those results
  - c. Assessments used to measure student progress and the proficiency levels the students are expected to meet Section 1118 (c)(4)(A)(B)

7. If requested by parents, schools shall provide opportunities for regular meetings to formulate suggestions and to participate in decisions relating to the education of their children, and respond to any such suggestions as practicably as possible. Section 1118 (c)(4)(C)

### **Evaluate Parental Involvement Policy**

1. Conduct, with the involvement of parents, an annual evaluation of the content and effectiveness of the parental involvement policy in improving the academic quality of the schools served under this part, including:
2. Identifying barriers to greater participation by parents in activities, with particular attention to parents who are economically disadvantaged, are disabled, have limited English proficiency, have limited literacy, or are of any racial or minority background.
3. Using the findings of such evaluations to design strategies for more effective parental involvement, and to revise, if necessary, the parental involvement policies described in this section. Section 1118 (a)(2)(E)

### **Parent Compacts**

Schools shall develop jointly with parents, for all children, a school-parent compact that outlines how parents, the entire school staff, and students will share the responsibility for improved student academic achievement. Section 1118 (d)

### **Build Parent Capacity**

1. Provide assistance to parents of children served under this program in understanding:
  - a. The state's academic content standards and student performance standards
  - b. The state's student academic achievement standards
  - c. The components of a school wide program, if applicable
  - d. The components of a targeted assistance school program, if applicable
  - e. The state and local assessments, including alternate assessments
  - f. The requirements of Title I, Part A
  - g. Ways parents can monitor their children's progress and work with educators to improve the academic achievement of their childrenSection 1118 (e)(1)
2. Provide materials and training to help parents work with their children to improve achievement, such as literacy training and using technology, as appropriate, to foster parental involvement. Section 1118 (e)(2)
3. Educate teachers, pupil services personnel, principals, and other staff with the assistance of parents, on the value and utility of contributions of parents, and how to reach out to, communicate, and work with parents as equal partners,

implement and coordinate parent programs, and build ties between home and school. Section 1118 (e)(3)

4. Coordinate and integrate parental involvement programs, activities, and strategies with Head Start, Reading First, Early Reading First, Even Start, Home Instruction Programs for Preschool Youngsters, the Parents as Teachers Program, and public preschool and other programs, such as parent resource centers, that encourage and support parents in more fully participating in the education of their children. Section 1118 (e)(4)
5. Ensure that information related to school and parent programs, meetings, and other activities is sent to the parents of participating children in a format and, to the extent practicable, in a language the parents can understand. Section 1118 (e)(5)
6. Provide such other reasonable support for parental involvement activities under this section as parents may request. Section 1118 (e)(14)

### **Attendance Areas and Allocations of Title I Funds**

There are written procedures outlining the specific methods for collecting accurate data for the attendance area determination worksheet located in the Title I Handbook provided by the GADOE which follows federal guidelines. This worksheet is uploaded to the Consolidated Application and supporting documents are kept on file. Upon completion of this worksheet, schools are ranked according to their poverty levels.

### **Allocation of Title I, Part A Funds**

Schools are ranked according to the poverty levels based on the Free and the Reduced meal data. Schools having 100% poverty levels are served first. Schools with poverty levels greater than 75% but less than 100% are served next. Schools with poverty levels of 75% or less are then served by grade span until the funds are exhausted.

The Title I Director makes sure that schools that received Title I funding are located in an approved Title I attendance area. He tries to allocate more to the highly ranked poverty schools (greater than 75% of poverty level), than others. Also, the Board does not serve any attendance areas below 35% poverty level. All schools that receive Title I funding are located in an approved Title I attendance area.

Anetria Edenfield, Federal Programs Director, follows Title I - part A guidance to complete area attendance worksheets. Communication between Chandra Hooks, School Nutrition Director and Mrs. Edenfield is ongoing in order to keep abreast of free/reduced counts in schools. Additionally conversations are held at principal meetings concerning school status.

### **Private School Participation**

Each year in the fall, the Federal Program Director reviews the [Private School DE 1111](#) forms that have been received by the district and reviews the [private school list](#) on the Ga.DOE website to determine which private schools should be invited to participate in Emanuel County School System Federal Programs. The Federal Programs Director sends an invitation to participate in the next school year's federal programs using the ES4PS portal with-in the geographic boundaries of Emanuel County and to all private schools in which children that are residents of Emanuel County are enrolled. This invitation is sent in the fall, before the spring needs assessment and program planning for the following year takes place so that private schools that wish to participate can be a part of that process. The invitation states the programs that are available for consultation and request a return notification that indicates intent. The Federal Programs Director receives and files all returned intent forms. At the time indicated in the invitation, the meeting is held regardless of the nature of the responses from private schools. The Federal Programs Director documents the meeting with an agenda, a sign-in sheet, and minutes if there is discussion. Presently no private schools participate in federal programs in Emanuel County.

### **Federal, State, and Local Professional Qualifications**

Emanuel County School System is a Strategic Waiver School System that has waived certification for all teachers except Special Education teachers. However, content certification will be waived for Special Education teachers. The district's minimum professional qualifications are:

Georgia Teaching Certification in any field

OR,

A bachelor's degree from an accredited college or university and hold a clearance certificate from GAPSC.

To ensure that all teachers and paraprofessionals meet applicable federal, state, and/or local professional qualifications and certification requirements the Federal Programs Director will Coordinate with the HR Director to ensure that all new employees of the system have necessary certifications by September 1st of each school year.

The Federal Programs Director, HR Director, and the IDEA Director will coordinate with school principals to review schedules to verify teaching assignments match certification. If a teacher is in a teaching assignment for more than four consecutive weeks where he or she does not meet applicable federal, state, and/or local professional qualification and certification requirements, the federal programs director will notify all parents of the students in those classes by mail within 10 business days with a letter containing the following information:

- Day/Month/Year of notification;

- Name of the teacher who has not met professional qualification requirements;
- Name of the LEA and/ or school/program; and,
- A statement that the teacher has not met State certification OR LEA charter/strategic waiver professional qualification requirements for the grade level(s) and/ or subject area(s) in which the teacher is assigned. Grade level and/or subject area must be identified.

At least once each semester the federal programs director will:

- Download the system level “Out of Field” report for teachers and paraprofessionals from the [gapsc.org](http://gapsc.org) In-Field Portal
- Review the report with the District’s Special Education Director, CPI administrator, HR Director and Data Collections administrator
- Identify teacher and/or paraprofessionals that do not meet applicable federal, state, and/or local professional qualification and certification requirements

In the event that teachers and/or paraprofessionals do not meet applicable federal, state, and/or local professional qualification and certification requirements the Federal Programs Director and the HR Director will develop a remediation plan with a timeline to rectify the situation. The Federal Programs and HR directors will monitor the plan until it is completed.

## **Title V, B**

### **Annual Evaluation Report Procedures**

Each year before submitting the Title V, B budget, the federal programs director uses the Title V, B completion report from the previous year to complete the Title V, B REAP annual evaluation in the DOE consolidated application. LEAs receiving Title V, Part B funds must indicate each of the activities in which Title V, Part B funds were spent and report the amount in whole dollars. Each activity must have been previously approved by the Consolidated Application. This report should only reflect expenditures for the previous school year.

## **Title I, Part C, Migrant**

### **The Emanuel County School System is part of the GaDOE MEP Consortium.**

The district uses the Occupational Survey provided by the MEP coordinator to identify migrant students. Migrant students are evaluated academically like other students in the school system to determine academic needs. All migrant students are eligible for Title I services and receive appropriate Title I services. The LEA uses the “priority for services” form from the GaDOE MEP Region 1 office. In addition a referral is made to student services to indicate additional services that may be needed from that department. Additionally, specific activities to address the needs of migratory families are provided.

Such activities shall include informing children and families of, or helping such children and families gain access to, other education, health, nutrition, and social services. Parent outreach is provided in a language that is understood by the family if at all possible. The TransAct program is used for translation as well as private consultants when needed. Parents are presented information on ESOL, special education, gifted, and other educational programs. Information on health, nutrition and social services is presented using materials from the migrant education agency. Presenters from local agencies such as the Health Department, DFACS, and County Extension office may be involved.

The Georgia Department of Education Parent Occupational Survey, which is provided by the migrant education agency, is included in the registration packet for all registering students throughout the school year and in the form packet given to all returning students at the beginning of each school year. The principal & registrar at each school is responsible for ensuring that all Occupational Surveys are collected from returning students and forwarded to the LEA Migrant contact person at the district office. The LEA Migrant contact person reviews each Occupational Survey received and emails those needing further review to the Ga DOE MEP Region 1 office for further determination for students who indicate possible migrant eligibility. This process is ongoing, throughout the school year. The LEA Migrant contact person collaborates with the Migrant Education Program and other community agencies such as DFACS to provide appropriate services for identified families and children.

The Director of Federal Programs receives the Migrant Participation Report (MPR) twice per semester in the GaDOE portal. Within 5 days of receipt of this report, the Director of Federal Programs will update the student information system to indicate current status for migrant students by the program director. A report from the SIS file will be matched with the MPR and maintained in the district Title IC files.

### **Title X, Part C, Homeless**

#### **Emanuel County School System Procedures Education for Homeless Children and Youth**

*ESEA: Sec. 1112 and MV Sec. 722*

#### **IDENTIFICATION**

In compliance with state and federal requirements concerning the McKinney-Vento Homeless Assistance Act, the Emanuel County School District Title I office will designate a Title I homeless liaison (Sandra Brown) to coordinate services to eligible children and youth.

The McKinney-Vento Act defines homeless children and youth as individuals who lack a fixed, regular, and adequate nighttime residence. The term includes:

- Children and youth who are:
- sharing the housing of other persons due to loss of housing, economic hardship, or a similar reason (sometimes referred to as doubled-up);
- living in motels, hotels, trailer parks, or camping grounds due to lack of alternative adequate accommodations;
- living in emergency or transitional shelters;
- abandoned in hospitals; or
- awaiting foster care placement;
- Children and youth who have a primary nighttime residence that is a public or private place not designed for, or ordinarily used as, a regular sleeping accommodation for human beings;
- Children and youth who are living in cars, parks, public spaces, abandoned buildings, substandard housing, bus or train stations, or similar settings; and
- Migratory children who qualify as homeless because they are living in circumstances described above.

The liaison will coordinate services to homeless children and youth through collaboration with system and school personnel and community organizations in order to identify children and youth experiencing homelessness in the district, both in and out of school. The liaison will coordinate identification of children and youth in a timely manner to minimize the impact of homelessness on educational opportunities and services. The liaison will inform appropriate system level coordinators, principals, school improvement specialists, student social services personnel, and school level homeless liaisons of the McKinney-Vento Homeless Assistance Act and the local educational agency (LEA) homeless policies and procedures.

The homeless liaison will train school personnel on possible indicators of homelessness, on sensitivity and confidentiality in identifying families and youth who are experiencing homelessness, in procedures for completion of the system Homeless Residency form and for relaying the information to the liaison. The system liaison will instruct school registrars, secretaries, counselors, and/or other designated personnel to inquire about possible homelessness upon the enrollment and withdrawal of every student and to forward the system homeless residency form to the liaison. Posters are placed in each school in an area where parents may view. The liaison will maintain communication with the Emanuel County Local Interagency Planning Team and attend scheduled meetings to promote identification of homeless children and youth. Community partners in the identification of homelessness may include: welfare departments, social service agencies, public health and mental health providers, attendance officers, and legal/law enforcement service agencies.

The liaison will keep data on the number of children and youth experiencing homelessness in the district, where they are living, their academic achievement (including performance on statewide and district wide assessments), and the reasons for any enrollment delays and/or interruptions in their education or school transfers.

**Emanuel County school system procedures for enrolling students who may be homeless:**

1. Parent/guardian/caretaker completes registration packet.
2. Enrolling staff will refer the parent/guardian/caretaker to the school system social worker for consultation.
3. Social workers will assist parent/guardian/caretaker in obtaining necessary documents (i.e., birth certificate, immunizations, proof of residence, etc.) and will ensure that enrollment is not delayed due to lack of documents.
4. Homeless students will be accepted for enrollment immediately regardless of documentation.
5. Social workers will make contact with school administrators on behalf of homeless students to ensure timely enrollment and to ensure equal access to the same free, appropriate public education as other housed students.
6. Social workers will make available any items necessary for homeless students to attend school without penalty (i.e., collared shirts, shoes for P.E., school supplies, etc.) and may use Title 1, Part A funds when resources are not otherwise available.
7. Social worker will assist parent/guardian/caretaker/unaccompanied youth in locating resources available within the community (i.e., housing authority, food bank, medical assistance, food stamps, TANF, medical, dental and/or mental health services, United Way crisis fund, emergency energy assistance, etc.)
8. Social workers will collaborate with the school of origin when a homeless student presents for enrollment from another school district. Consideration will be given as to which school system will better serve the student's needs taking into account distance, travel time, services available, etc.
9. Transportation will be provided for homeless students to and from their school of origin if requested by parent/guardian/caretaker. Social workers will collaborate with the homeless liaison in the school of origin district to coordinate best/most practical and feasible means of transport. In an emergency period, Title 1, Part A funds will be used to purchase gas vouchers/cards in order to assist with transportation until a more permanent transportation plan can be developed.
10. Social workers will collaborate with parents/guardian/caretaker to ensure that they are aware of available options and participate in decisions.
11. Any concerns or complaints will be directed to the system homeless liaison. The dispute resolution process will be followed according to the state plan for the Education of Homeless Children and Youth. The student will remain in the school requested by the parent/guardian/caretaker until the dispute is settled.

## **B. SCHOOL SELECTION**

Each child or youth experiencing homelessness has the right to remain in his/her school of origin, or to attend any school that housed students, who live in the attendance area in which the child or youth is actually living, are eligible to attend. Maintaining a student in his/her school of origin is important for both the student and the school district. Students who change schools have been found to have lower test scores and lower overall academic performance than peers who do not change schools. High mobility rates have been shown to lower test scores for schools and school systems. Keeping students in their school of origin promotes academic and social growth, while allowing the schools to maintain more stable test scores and achievement resulting from student continuity. To the extent feasible, children and youth experiencing homelessness will remain in their schools of origin. If this policy is against the parent's or the youth's wishes or not in the best interest of the child, appropriate school placement will be established to meet the needs of the family and student. Students may remain at the school of origin the entire time they are experiencing homelessness and until the end of the year in which they become permanently housed. The same guidelines will apply if a child or youth becomes homeless between academic school terms.

Feasibility shall be a child-centered determination, based on the needs and interests of the particular student and the parent's and youth's wishes. Feasibility considerations include:

- Safety of the student
- Continuity of instructional services
- Potential family's or youth's future housing
- Time remaining in the current academic term
- Anticipated length of stay in temporary housing or living situation
- School placement of siblings
- Special needs that limit placement due to commute issues or facilities

Services that are required to be provided, including transportation to and from the school of origin and services under federal and other programs, shall not be considered as factors of feasibility.

## **C. ENROLLMENT**

Consistent, uninterrupted education is essential to academic achievement. Because of the complicated issues related to homelessness and mobility, students who experience homelessness are likely not to have required school enrollment documents readily available when they seek to enroll in a different school or system. Regardless of the availability, or the lack thereof, of required documents, the selected school of enrollment must immediately and without restriction enroll the child or youth experiencing homelessness. Enrollment may not be denied on the basis of lack of any document normally required for enrollment, including:

- Proof of residency
- Transcripts/school records (The enrolling school must contact the student's previous school to obtain school records. Initial placement of students for whom records are not immediately available can be made based on the student's age and information gathered from the student, parent, guardian, and previous schools and/or teachers.)
- Immunizations or immunization/health/physical records (If necessary, the school must refer students to the liaison to assist with obtaining immunizations and/or other medical records (i.e. Eye, Ear, Dental, Nutrition Screen). Health records may often be obtained from previous schools or state registries, and school-based or community-based clinics can initiate immunizations when needed.)
- Proof of guardianship
- Birth certificate
- Any other document requirements
- Unpaid school fees
- Lack of uniforms or clothing that conforms to dress codes
- Any factor related to the student's living situation

Unaccompanied youth must also be immediately enrolled in school. They may either enroll themselves or be enrolled by a parent, non-parent caretaker, older sibling, or the LEA homeless liaison.

#### **D. TRANSPORTATION**

Without appropriate transportation, a student experiencing homelessness may not be able to continue attending his/her school of origin. To avoid such forced transfers, at a parent's request, transportation shall be provided to and from the school of origin for a child or youth experiencing homelessness. To ensure that system transportation

personnel are aware of LEA homeless transportation responsibilities for homeless children, the LEA homeless liaison will hold a training at the beginning of the school year before October 1st and one at the beginning of the second semester before March 1st with LEA transportation personnel to inform and facilitate coordination and appropriate assistance to access transportation for homeless children and unaccompanied youth. These meetings will include transportation directors and bus drivers and topics will include homelessness awareness, sensitivity, and the LEA's transportation responsibilities under McKinney-Vento. The LEA homeless liaison will maintain a copy of the agenda and sign in sheets of each meeting. The LEA homeless liaison is responsible for implementing this procedure.

The LEA homeless liaison will ensure that all parents of children or youth experiencing homelessness are aware of their transportation rights and will document with the Emanuel County Schools Residency Information Form. Transportation shall be provided for the entire time the child or youth has a right to attend that school, as defined above, including during pending disputes. The LEA homeless liaison shall request transportation to and from the school of origin for unaccompanied youth. The length of the commute will only be considered in determining the feasibility of placement in the school of origin based on potential harm to the student, as discussed above. Parents and unaccompanied youth must be informed of this right to transportation before they select a school for attendance; the homeless liaison is responsible for ensuring this.

In addition to receiving transportation to and from the school of origin upon request, children and youth experiencing homelessness shall also be provided with other transportation services comparable to those offered to housed students.

## **E. DISPUTES**

If a dispute arises over any issue related to homelessness of children and youth as covered in this Emanuel County School Procedures for Implementation of the McKinney-Vento Homeless Act, the child or youth experiencing homelessness shall be immediately admitted to the school in which enrollment is sought, pending final resolution of the dispute. The student shall have the rights of a student experiencing homelessness, including all appropriate educational services, transportation, free meals, and Title I services, while the dispute is pending.

The school where the dispute arises shall provide the parent or unaccompanied youth with a written explanation of its decision and the right to appeal and shall immediately refer the parent or youth to the homeless liaison. The liaison shall ensure the student is enrolled in the school of his/her choice and is receiving other services to which he/she is entitled and shall resolve the dispute as expeditiously as possible. The parent or unaccompanied youth shall be given every opportunity to participate in a meaningful manner in the resolution of the dispute. The homeless liaison shall keep records of all

disputes in order to identify particular issues or schools that are repeatedly delaying or denying the enrollment of children and youth experiencing homelessness.

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

## **F. CREDIT FOR FULL OR PARTIAL COURSEWORK**

School counselors will meet with homeless youth and their parent/caretaker/enrolling adult to check school transcripts and to determine the most appropriate means to acquire full credit for all coursework. When the student has partial or missing credits, they are given at least 1 class period during the school day to use the Edgenuity computer online program (also known as E2020) to work at an accelerated pace in order to receive full credit for academic classes. All E2020 classes are staffed with a certified teacher to provide instruction and/or other educational interventions. Homeless youth in E2020 classes are afforded the opportunity to complete assignments outside of school when necessary. All tests and quizzes are completed at school.

## **OTHER SERVICES**

Children and youth experiencing homelessness shall be provided services comparable to services offered to housed students in the school selected, including:

- Transportation
- Title I, Part A
- Educational services for which the student meets eligibility criteria, including special education and related services and programs for English Learners
- Vocational and technical education programs
- Gifted and talented programs
- School nutrition programs
- Before-school and after-school programs

The district recognizes that children and youth experiencing homelessness may also experience disabilities at a disproportionate rate, yet frequently may not be evaluated nor provided appropriate special education and related services. To address this problem, evaluations of children and youth experiencing homelessness and suspected of having a disability, shall receive priority and shall be coordinated with students' prior and subsequent schools to ensure timely completion of the necessary/complete

evaluation. In order to prevent any disruption to appropriate educational services, if a student has an existing Individualized Education Program (IEP), the enrolling school shall immediately implement it. All necessary IEP meetings or re-evaluations shall be conducted expeditiously after the plan implementation is begun and adjustments/rewriting of the IEP completed as indicated on the basis of the new data. If complete records are not readily available, IEP teams must use good judgment to determine the best course of action, balancing procedural requirements and the provision of services. In all cases, the goal is to provide appropriate services while avoiding any disruption to such services.

When applying the district policy regarding tardiness or absences, school administrators and the district attendance officer will take into consideration a child or youth's living situation and/or homelessness status. Our district will follow state procedural policies and guidelines to ensure that youth experiencing homelessness and youth who are out of school are identified and accorded equal access to appropriate secondary education and support services. School personnel shall refer children and youth experiencing homelessness to appropriate health care services, including dental and mental health services. The social worker/homeless liaison shall assist in making such referrals, as is necessary on an individual basis.

School personnel must also inform parents of all educational and related opportunities available to their children and provide parents with meaningful opportunities to participate in their children's education. To the extent feasible, all parent information required by any provision of this policy must be provided in a form, manner, and language understandable to each parent.

## **FREE MEALS**

Hunger and poor nutrition are preventable barriers to learning. To ensure that children and youth experiencing homelessness are available for learning and have adequate nutrition, the U.S. Department of Agriculture has determined that all children and youth experiencing homelessness are automatically, upon enrollment, eligible for free meals. All children attending Emanuel County Schools are immediately eligible to receive free meals.

## **TITLE I, PART A**

Children and youth experiencing homelessness are automatically eligible for Title I, Part A services, regardless of the school they attend, as all Emanuel County Schools are Title I schools. The trauma and instability of homelessness places students at risk of academic regression to warrant additional support. The district shall reserve such funds as are necessary to provide services to children and youth experiencing homelessness that are comparable to those provided to Title I, Part A students. The amount reserved shall be determined by the homeless liaison by using **Method 1: Identify the homeless students' needs and fund accordingly**. The amount reserved will be approved by the

Federal Programs Director. Reserved funds will be used to provide emergency school supplies in case of disaster (notebooks, writing utensils, dress code approved clothes, eyeglasses) and short term/emergency transportation to the school of origin.

Our district's Title I, Part A plan will be coordinated with our McKinney-Vento services, through collaboration between the Emanuel County School District Social Worker/Homeless Liaison, Director of Special Education, Gifted, English Learners Program and Migrant Education Program. Children and youth experiencing homelessness shall be assessed, reported on, and included in accountability systems as required by federal legislation and the U.S. Department of Education regulations and guidance.

## **TRAINING**

The Emanuel County schools' homeless liaison will conduct training and sensitivity/awareness activities for the following school and school system staff at least once each year: the assistants to the superintendent, principals, federal program administrators, school counselors, school social workers, and school homeless liaisons. The principal, counselor, and/or homeless liaison at each respective school will deliver the information to the faculty and staff at that school. Other department heads such as transportation, food services will deliver the information that is gained from the training to the personnel in their respective departments. The training and activities will be designed to increase awareness of homelessness, facilitate immediate enrollment and educational services, ensure compliance with this policy, and promote sensitivity to the issues of children and youth experiencing homelessness.

## **COORDINATION OF STATE AND LOCAL SERVICES**

The Emanuel County schools' homeless liaison shall coordinate with and seek the assistance and support of the State Coordinator for the Education of Homeless Children and Youth, public and private services, providers in the community, housing and placement agencies, the pupil transportation department, liaisons in neighboring districts, and any other such organizations or agencies that provide needed support. Coordination will include conducting outreach and training to those agencies and participating in the local continuum of care, homeless coalition, homeless steering committee, and other relevant groups. Both public and private agencies will be encouraged to support the homeless liaison and our schools in implementing this policy.

Children with disabilities, who are experiencing homelessness, will be referred for preschool services under the Individuals with Disabilities Education Act (IDEA). Children experiencing homelessness under age three will be referred for at-risk services under the Title I, VI, Part C of IDEA and will be screened to determine if referrals for additional Title VI, Part C of IDEA services are appropriate. The Emanuel County schools' homeless liaison will coordinate with Head Start and Even Start programs and other

preschool programs to ensure that children experiencing homelessness have access to those programs.

#### **TITLE IV, PART A**

The Director of Federal Programs will monitor effectiveness of Title IVA funds in a variety of ways throughout the school year. The CTAE Advisory Council will be updated quarterly on the uses of Title IVA funds and their input will be considered when planning for and budgeting for the year. The Director of Federal Programs will meet with building principals once per quarter to review goals and action steps being addressed with Title IVA funds and lastly, the director will complete annually the Title IV, Part A Student Support and Academic Enrichment Program Monitoring/Effectiveness Summary.

#### **TITLE III**

##### ***ENTRANCE AND EXIT PROCEDURES***

**ENTRANCE-** The Emanuel County School Systems follows the entrance procedures found in the EL Language Programs State Guidance. All students enrolling for the first time in a school complete home language surveys. When parents report two primary home languages, one of which is English, the statewide standardized procedure is to identify this student as a potential English learner and screen him or her for English language proficiency. EL teachers assigned to each school screen for potential EL identification within 30 days of enrollment.

**EXIT-** The minimum criterion must be an ACCESS Overall CPL of 4.3 and is a criterion only for an EL Reclassification Team to consider whether English learner (EL) students in grades 1-12 have demonstrated sufficient English proficiency to exit EL status and be successful in school without additional English language instruction support. Teachers will use GMAS, MAP and class grades when meeting the 4.3 score to determine final placement.

##### **MONITORED STUDENTS**

Each Fall the Title III Coordinator will provide ESOL teachers a list of students in Year 1 or Year 2 of monitoring. The teachers will use a Monitored Students form, developed by the district to document services provided to these students.

#### **TITLE V, PART B**

Each year the Emanuel County School System will create and submit a report evaluating the effectiveness of the Title VB program using the templates provided by the Georgia Department of Education. All districts that implemented Title V, Part B activities during the school year are required to complete the Annual Evaluation Report via the Consolidated Application.  
Data Collection Tab

- Title V, Part B REAP Evaluation Tab
  - The data for this report must reflect the previous school year.
  - The activities reported must match the activities reported on the Rural Education Initiative tab located under the Program Information Page submitted with the FY19 approved budget or the most recently approved budget amendment if applicable.
  - Choose “yes” or “no” for each of the five activities indicating whether the LEA participated.
  - For each activity the LEA implemented, choose “yes”, enter the dollar amount spent on that particular activity.
  - The total amount expended must match the Title V, Part B Program Completion Report; therefore, it is important to work with the LEA’s Finance Office to ensure accurate reporting of expenditures. Including carryover funds and current year allocations, report the amount expended for each activity that the LEA implemented.
  - Performance data for each LEA will be provided by the GaDOE.
  - When completed, the Coordinator must submit the report by clicking on the “Submit” button at the top of the form. The tab will then open up for the Superintendent to review and submit.
  - The Superintendent will then click on the “Submit” button at the top of the form to submit the report to the GaDOE. The report has not been submitted until the Superintendent has clicked on the “Submit” button.
  - The status of the report can be viewed under the Audit Trail tab by selecting the Data Collection Audit Trail tab. All activity on the tab is time stamped. Be sure to check back on the status as the report will be returned for revision if there are errors.
  - Information submitted in this report is aggregated to obtain statewide data to report to the United States Department of Education.

The deadline for submission of the Title V, Part B Annual Evaluation Report is October 30.

*Revised: July 10, 2025*