TROUP COUNTY SCHOOL SYSTEM

OUR SCHOOLS • OUR COMMUNITY • OUR FUTURE

Federal Programs
Policies and Procedures Manual
2025-2026

The Troup County School System is committed to educating ALL students using creative and innovative strategies that provide '*A Place for Every Kid*.'

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LOCAL EDUCATIONAL AGENCY (LEA) MONITORING OF SCHOOLS AND

PROGRAMS (ESSA: Sec. 9304; 2 CFR Sec. 200.328; 2 CFR Sec.200.330; 34 CFR Sec. 300)

The Every Student Succeeds Act of 1965 (ESSA), as reauthorized by the Every Student Succeeds Act of 2015 (ESSA), requires the Troup County School System (TCSS) to monitor the implementation of program requirements and the expenditure of federal funds. The TCSS will ensure that each program is:

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

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

Positions Responsible for Implementation and Monitoring of Federal Awards

The TCSS has assigned grant administrators to oversee all critical ESSA/IDEA requirements of all programs and its implementation at the district and school level (where applicable). The grant administrators responsible are as follows:

- Title I, Part A: Improving the Academic Achievement of the Disadvantaged – Director of Federal Programs
    - Homeless – Director of Federal Programs and Coordinator of Student Assignment/District McKinney-Vento Liaison
    - Title I, Part A: Foster Care Program – Foster Care Point of Contact (Federal Programs)
    - Title I, Part A: Family School Partnership Program – District Title I Parent and Family Engagement Coordinator
- School Improvement 1003(a) – Director of Federal Programs
- School Improvement 1003(g) – Not Applicable
- Title I, Part C: Education of Migratory Children – Director of Federal Programs
- Title I, Part D: Prevention and Intervention Programs for Children and Youth who are Neglected, Delinquent, or At-Risk – Director of Federal Programs
- Title II, Part A: Supporting Effective Instruction – Director of Federal Programs
    - Professional Qualifications – Chief Human Resource Officer
- Title III, Part A: Language Instruction for English Learners and Immigrant Students
- – Executive Director of Exceptional Education and Support Services
- Title IV, Part A: Student Support and Academic Enrichment – Director of Federal Programs
- Title V, Part B: Rural Education Initiative – Director of Federal Programs
- Title IX, Part A – McKinney-Vento Homeless Assistance Act – Director of Federal Programs and Assistant Director of Student Information / District MVP Liaison

- IDEA: Individuals with Disabilities Act – Executive Director of Exceptional Education and Support Services
- GNETS: Georgia Network for Educational and Therapeutic Support – Director of GNETS

Federal Grant Professional Learning

All grant administrators participate in professional learning and training on grant implementation. Grant administrators participate in the following:

- Budget Webinars
- Cross-Functional Monitoring Webinars
- Grant Specific Webinars
- Regional Trainings
- GaDOE Federal Programs Conference

Additionally, grant administrators participate in conferences related to grant administration such as the Data Conference, GCASE Conference, GCEL Conference, Homeless Conference, and other content related conferences to ensure effective implementation of the grant.

Federal Grant Technical Assistance

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

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

- Monthly administrative meetings (All programs)
- Comprehensive Needs Assessment and Improvement Plans (All programs)
- New Exceptional Education Teacher Orientation (IDEA)
- Systemwide Exceptional Education Meetings (IDEA)
- Exceptional Education Lead Teacher (SELT) Boot Camp (IDEA)
- Exceptional Education Related Services Meetings (Quarterly) (IDEA)
- Exceptional Education Lead Teacher (SELT) (monthly) (IDEA)
- New Exceptional Education Teacher Work Session (IDEA)
- Exceptional Education Consortia (IDEA)
- Positive Behavioral Interventions and Supports (PBIS) Coaches Meeting (monthly)
- Title I Training for Title I Instructional Specialists and Principals (Title I, Part A)
- Parent and Family Engagement Training (Title I, Part A)
- School Family Liaisons Training (Title I, Part A)
- Budget and Finance Training for Principals (Title I, Part A; Title II, Part A)
- Private School Technical Assistance and Professional Learning on Program Implementation (Title II, Part A)
- New Teacher Orientation (Title II, Part A/Human Resources)
- AP Strategies (Title IV, Part A)

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

- Budgets
- Planning
- Compliance Issues

- Parental Engagement
- School Improvement
- Monitoring
- Academic Achievement
- Professional Qualifications
- Fiscal Requirements
- Inventory Management

Specific professional learning is provided on but not limited to:

- Effective planning (PLCs)
- Literacy strategies
- Using assessments
- Differentiation
- Using technology to increase student achievement
- Writing
- Increasing rigor in instruction
- Positive Behavior Interventions and Supports
- Student goal setting (Title I, Part A)
- Creating a Culture of Reflective Practice (Title I, Part A)
- Data analysis on ACCESS test scores (Title III, Part A)

A districtwide required new hire onboarding and orientation is completed by every new certified staff member. The course contains policies, procedures, and important information for staff including but not limited to:

- Code of Ethics
- Board Policy Oath Statements
- Technology Usage
- Teacher Keys Effectiveness System (TKES)
- Professional Learning Goals/Plans/Communities

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

Monitoring of All Programs

Monitoring of programs is conducted through school visits, data analysis, and review of expenditures.

School Visits

Grant administrators and designees observe grant implementation through various school visits that include:

- Compliance observations – Observations conducted for federal grant staff and/or initiatives
- Data talks – discussions of quarterly data dashboards (subgroup data)

School visits are ongoing and are completed during both semesters to ensure effective grant implementation. Grant administrators and/or designees address identified issues as needed and use data to improve effectiveness.

Data Analysis

Grant administrators review data to ensure the efficient and effective implementation of their respective grant. Data analysis includes:

- Measures of academic progress
- Review of applicable software reports
- Review of evidence-based interventions (logic models/effectiveness plans)

Expenditures

Each grant administrator reviews and approves expenditures for their respective grant. Each grant administrator follows the processes outlined in this manual including:

- Allowability
  - Grant Development
  - Budget Development
  - Review of Expenditures for Allowability
  - Approval of Fund Requests Based on Identified Needs
  - Supplement not Supplant
  - Alignment to Cost Principle Allowability
  - Resource Allocation Methodology/Plan
- Maintaining Segregation of Duties
- Procurement Requirements
  - Purchase Limits/Methods of Procurement with Federal Funds
  - Requisition Process
  - Purchase Order Process
  - Unauthorized Purchases
  - Verification of Delivery of Goods and Services
- Technical Evaluation of Competitive Proposals
  - Competitive Bidding Procedures
  - Request for Proposals Procedures
- Personal Compensation Policies
  - Salaries
  - Substitutes
  - Stipends
  - Extended Learning
  - Supplemental Pay
  - Time and Effort
- Stipend Policy
- Travel Policy
- Cash Management and Drawdown Procedures

Inventory

Each grant administrator monitors inventory to ensure that equipment is being used to support allowable grant initiatives.

Program-Specific Monitoring

Program-specific monitoring is conducted for individual grants based on program-specific requirements.

Title I, Part A

- Federal Programs Monthly Calendar
  - A monthly school calendar of deadlines and reminders (Title I Checklist) is provided to each school. The calendar and documentation is reviewed on a monthly basis by the Federal Programs Department.
- Purchasing
  - A copy of the SIP and/or SWP with initiative highlighted is attached to each Purchase Order to show alignment to the School Improvement Plan.
  - School administrators are instructed to prevent stockpiling of supplies such as paper.
- Expenditures
  - A copy of school expenditure ledgers is sent to each school once each semester. The ledger shows all expenditures spent to date and the remaining funds. Reminders of purchasing requirements and deadlines are also sent to the principal and school bookkeeper.
- Paraprofessionals
  - A Paraprofessional Assignment Form is completed for paraprofessionals to show supervision by a teacher who meets professional qualifications (PQ). A schedule and map are attached to the form for each paraprofessional. The form indicates:
    - How the teacher plans the instructional activities
    - How the instructional paraprofessional works with teachers to plan activities for multiple grade levels (if applicable)
    - How the teacher evaluates the achievement of students with whom the instructional paraprofessional works
    - How the instructional paraprofessional works under direct supervision of a PQ teacher
    - The processes used to oversee the instructional paraprofessional assignments at the school and the school-level person responsible for monitoring the assignments and supervision
- Teachers
  - Schedules are provided to and reviewed by the Federal Programs Department to ensure compliance.
  - Status toward meeting district professional qualifications is monitored by the Human Resources Department on a monthly basis. Remediation plans are also monitored for staff progress.
- Private Schools (no participating schools at this time in Title I, Part A)
  - Plans for improvement and effectiveness are created and monitored by Federal Programs staff.
  - Initiative implementation is reviewed by Federal Programs staff on an ongoing basis.
- Data Analysis Dashboard Spreadsheets
  - Data Analysis Dashboard spreadsheets are reviewed quarterly to ensure focus on academically at-risk students.
- Parent Engagement

        - A Calendar for School-Level Parent and Family Engagement is provided for each school. The District Parent and Family Engagement Coordinator reviews the supporting documentation submitted monthly. Feedback is provided to schools in writing.
        - School Family Liaisons record parent attendance for parent engagement meetings and workshops. This is used to track effectiveness of the program.
        - Budget meetings are conducted with schools to ensure that the parent engagement set-aside is spent and that funds are spent to meet parent needs/requests.
        - Federal Programs staff attend school level meetings and workshops to ensure compliance and to provide technical assistance. Feedback on events is provided to the schools.
    - Stakeholder Documentation
        - Sign-in sheets are reviewed by the Federal Programs Department to ensure required stakeholders are involved in input meetings including:
            - Comprehensive Needs Assessment
            - School Improvement Plan
            - School-Parent Compact
            - Parent and Family Engagement Policy (School and District)
            - Reservation of Funds
            - Building Staff Capacity

School Improvement 1003(a)

- Technical support is provided directly to identified schools in collaboration with the GaDOE and/or RESA based on areas of identified need.
- Expenditure deadlines are monitored by the Director of Federal Programs and provided to each school on an ongoing basis.
- Ongoing data analysis artifacts are collected and reviewed by the CIT Team to target areas identified for improvement on an ongoing basis.

Title I, Part C

- A report from the student information system is pulled each month to review migrant enrollments.
- Parent Occupational Surveys are reviewed on an ongoing basis to determine migrant student eligibility through the online registration process.
- Students are monitored in collaboration with the Regional Migrant Education Office. Student data reports are reviewed including quarterly grades and enrollment.

Title I, Part D

- Expenditures
    - A copy of school expenditure ledgers is sent to the school once each semester. The ledger shows all expenditures spent to date and the remaining funds. Reminders of purchasing requirements and deadlines are also sent to the principal.
- Paraprofessionals
    - A Paraprofessional Assignment Form is completed for

paraprofessionals to show supervision by a teacher who meets professional qualifications (PQ). A schedule and map are attached to the form for each paraprofessional. The form indicates:

- How the teacher plans the instructional activities
- How the instructional paraprofessional works with teachers to plan activities for multiple grade levels (if applicable)
- How the teacher evaluates the achievement of students with whom the instructional paraprofessional works
- How the instructional paraprofessional works under direct supervision of a PQ teacher
- The processes used to oversee the instructional paraprofessional assignments at the school and the school-level person responsible for monitoring the assignments and supervision

- Teachers (If Applicable)
  - Schedules are provided to and reviewed by the Federal Programs Department to ensure compliance.
- Parent Engagement
  - The District Parent and Family Engagement Coordinator works closely with the staff at the school and reviews parent engagement documentation submitted. Feedback is provided to schools in writing.
  - Federal Programs staff attend school level meetings and workshops to ensure compliance and to provide technical assistance. Feedback on events is provided to the schools.
- Stakeholder Documentation
  - Sign-in sheets are reviewed by the Federal Programs Department to ensure required stakeholders are involved in input meetings including:
    - School Improvement Plan
    - School-Parent Compact
    - Parent and Family Engagement Policy (School and District)
    - Building Staff Capacity

<u>Title II, Part A</u>

- Data is monitored by the Federal Programs and School Improvement and Assessment Departments for progress in implementing the selected equity intervention gap and corresponding equity interventions. Data is also monitored for funded strategies including:
  - Measures of Academic Progress
  - CCRPI Data
- The purpose of each initiative is listed on the purchase order to show alignment to the Comprehensive Needs Assessment, Improvement Plan, and Equity Plan.
- Student enrollment data is monitored by the Human Resources and Federal Programs Departments monthly to ensure all parents of new enrolling students receive the 20-day parent notification in a timely manner.

Title III, Part A

- Data is monitored on an ongoing basis for English Learners including:
    - Home Language Survey data
    - ACCESS test data
    - WIDA Screener data

Title IV, Part A

- The purpose of each initiative is listed on the purchase order to show alignment to the Comprehensive Needs Assessment and Continuous System Improvement Plan as well as the allowable use for funds (Well-Rounded Educational Opportunities, Safe and Healthy Students, or Effective Use of Technology).

Title V, Part B

- The purpose of each initiative is listed on the purchase order to show alignment to the Comprehensive Needs Assessment and Continuous System Improvement Plan.
- An annual evaluation report will be completed by the LEA.

Neglected

- An annual consultation is held to discuss facility/student needs.
- Tutors submit monthly time logs.
- Federal Programs staff frequently checks in with tutors and facility staff.

Homeless

- A list of homeless children and youth is maintained and reviewed by the Coordinator of Student Assignment/District McKinney-Vento Liaison on an ongoing basis. Quarterly and end of year reports are also reviewed.
- Support provided to homeless students is monitored by the Coordinator of Student Assignment/District McKinney-Vento Liaison.
- The District McKinney-Vento Liaison meets bi-annually with school contacts for technical assistance.

Foster Care

- A list of foster children is maintained and reviewed by the District Parent and Family Engagement Coordinator/Foster Care Point of Contact on an ongoing basis.
- Quarterly and end of year reports are also reviewed.
- The Foster Care Point of Contact meets bi-annually with school contacts for technical assistance.

IDEA

- A Paraprofessional Assignment Form is completed for paraprofessionals to show supervision by a teacher who meets professional qualifications. Schedules are provided to the district staff. The form indicates how the teacher plans the instructional activities.
- The Exceptional education Lead Teacher submits the monthly logs for the paraprofessionals detailing the information from the required weekly meeting. This log is reviewed by District Exceptional education staff.
- The Exceptional education Director and the Assistant Director of Human

Resources review the exceptional education paraprofessional assignment lists quarterly.
- Grant initiatives are monitored weekly. Indicators, including restraints, crisis, and discipline are discussed and reviewed at monthly meetings.

GNETS

- A master list of trained Mindset participants is maintained and reviewed by the GNETS Director and coordinators. Participants receive a certification form and membership card that is maintained in their personal files.
- A master list of trained Life Space Crisis Intervention (LSCI) participants is maintained and reviewed by the GNETS Director and coordinators. Certification is maintained in the employee's personal file.
- A master list of trained Student Achievement Model (SAM) participants is maintained and reviewed by the GNETS Director and coordinators. Certification is maintained in the employee's personal file.
- The GNETS programs utilize a web-based academic program called i-Ready. The GNETS Director and coordinators monitor assessment data.
- The GNETS Director and coordinators monitor the number of restraints in Infinite Campus.
- The GNETS Director and coordinators monitor discipline numbers for out of school suspension.
- The GNETS Director, coordinators and social workers monitor the numbers of Division of Family and Children Services' referrals.
- The GNETS Director and coordinators monitor the number of student hospitalizations and mental health agency involvement

Frequency of Monitoring

Annual Timeline

Each grant administrator follows the timeline outlined in the Federal Programs Year-at-a-Glance Calendar published on the GaDOE website.

- **June**
  - Submit Title III, Part A Annual Report (June 1)
  - GaDOE Federal Programs Conference
  - Gather FTE and poverty data for any schools that are closed, opened, or rezoned
  - Finalization of District and School Comprehensive Needs Assessment and Improvement Plans
  - Complete end-of-year Title II Effectiveness Plan
  - Complete end-of-year Title IVA Effectiveness Summary
  - Private school evaluation of effectiveness
  - Completion of self-monitoring
- **July**
  - Complete periodic certifications for January-June (all programs)
  - Intradistrict transfer notification deadline (July 1)
  - RAM/P submission (July 1)
  - Comprehensive LEA Improvement Plan (CLIP) submission (July 31)
  - Distribution of Right to Know notification

- Staff professional learning on grant requirements
- Prioritizing the Distribution of Funds (Title IV, Part A)

- **August**
  - Ensure proper assignments of teachers based on professional qualifications
  - Completion of Title I paraprofessional assignment forms, schedules, and map (Title I only)
  - Completion of Title I teacher schedules
  - Initial distribution of letters to English Learner (EL) families (ELs participating in Title I or Title III funded supplemental English language support services) (30 days after the beginning of the school year)
  - Distribution of District Parent and Family Engagement Policy
  - Distribution of Right to Know notification
  - Services begin for private schools
  - Begin distribution for 20-Day Parent Notifications (Dissemination 10 business days after the 20-day period)
  - Title I Annual Meetings and Open House Meetings to Gather Stakeholder Input on School Parent Compacts (Title I, Part A)
  - Distribution of Parent and Family Engagement Policies (Title I, Part A)
  - Homeless Liaison and Foster Care Point of Contact update school contact personnel
- **September**
  - Title I Public School Allocation Tab Completed (Schools and grade span only) (September 15)
  - Deadline for meeting expenditure requirements (September 30)
  - Annual Education for Homeless Children and Youth Survey (September 30)
  - Schoolwide Plan Checklists due (Title I, Part A only)
  - Curriculum/Academic Nights
  - Distribute private school letters for consultation meeting (private schools)
  - Title I Annual Meetings and Open House Meetings to gather stakeholder input on School Parent Compacts (Title I, Part A)
  - Distribution of Parent and Family Engagement Policies (Title I, Part A)
- **October**
  - Archive documentation
  - GEPA 427 Attachment in Consolidated Application (October 1)
  - Budget deadlines – Title I, Part A; Title I, Part D; Title II, Part A; Title III, Part A; Title IV, Part A; Title V, Part B; Title IX, Part A (October 1)
  - Superintendent Prayer Certification sign-off (October 1)
  - FTE enrollment data submission (first Tuesday in October)
  - Conduct trial run of comparability
  - CPI transmission cycle begins
    - Review CPI data
  - Carryover waiver
  - Completion report (October 30)

- Title V, Part B Evaluation (October 30)
- Distribute private school letters for consultation meeting (new private schools)
- Fall Parent Teacher Conferences

- **November**
  - Title I Annual Meetings complete and compact cover letters complete (by November 1)
  - Submit online Title I Comparability Report (November 15)
  - Parent Engagement Month Activities
- **December**
  - Private school consultation meeting
  - Annual Neglected and Delinquent Survey due (December)
  - District must demonstrate comparability (December 31)
  - Submission of Title I teacher and paraprofessional schedule changes for second semester (Title I, Part A only)
- **January**
  - Complete periodic certifications for July-December (all programs)
  - Begin private school consultation
  - Submit carryover amendments
- **February**
  - School Improvement Forum meetings for input on the School Improvement Plan/Schoolwide Plan, Parent and Family Engagement Policy, reservation of funds
  - Annual GCEL Conference
- **March**
  - District team meetings for the Comprehensive Needs Assessment
  - School Improvement Forum meetings for input on the School Improvement Plan/Schoolwide Plan, Parent and Family Engagement Policy, reservation of funds
  - Spring Parent Teacher Conferences
- **April**
  - District team meetings for the Improvement Plan
  - Parent Advisory meeting for the District Comprehensive Needs Assessment, Improvement Plan and CLIP
- **May**

  Deadline for amendments for Title I, Part A

  Distribution of Parent Notification of Student Continuation of ESOL Services (Title III, Part A)
  - Consultation with homeschool parents/guardians (May 30) (IDEA)
  - Deadline to submit Education of Homeless Children and Youth (EHCY) Evaluation and Continuation Report

Monthly Monitoring of Documentation

Grant administrators and designees also monitor monthly documentation. Documentation

includes:
- Split-funded time logs
- Review of expenditures and drawdowns
- Monitoring of private school implementation (student needs, professional development, physical inventories)
- Letters for ELs participating in Title I or Title III funded supplemental English language support services (Title I, Part A and Title III, Part A)
- School parent engagement documentation (Title I, Part A)
- Federal Programs Monthly School Calendar (Title I Checklist) documentation (Title I, Part A)
- Migrant student report (Title I, Part C)
- 20 Day-Parent Notification Letters (Title II, Part A)
- Teacher remediation plans (Title II, Part A)
- EL class roster verification (Title III, Part A)
- Exceptional Education Paraprofessional Log (IDEA)
- Data from Exceptional Education Lead Teachers Monthly Meetings (IDEA)
- Exceptional Education Student Compliance Monitoring Reports (IDEA)

Daily Monitoring of Documentation

Grant administrators and designees also monitor documentation on a daily basis. Documentation includes:
- Expenditures (purchase orders, contracts, substitutes, stipends)
- Title I paraprofessional schedule changes (as needed) (Title I, Part A)
- Title I teacher schedule changes (as needed) (Title I, Part A)
- Occupational surveys (Title I, Part C)
- Migrant student communication (Title I, Part C)
- Evidence that paraprofessionals have met federal, state and district professional qualification requirements (Title II, Part A)
- Monitoring identification of ELs in TCSS enrollment process (Title III, Part A)
- WIDA screener administered upon EL enrollment if applicable (Title III, A)

Maintenance and Collection of Documentation for Monitoring

Each grant administrator will retain documentation to support monitoring, implementation, and evaluation of their respective grant. Documentation for all programs includes:
- Important Dates and Meetings Calendar
- Professional Learning Days
- Comprehensive Needs Assessment and School Improvement Plans
- Meeting agendas, sign-in sheets, and supporting documentation
    - General meetings, professional learning, and technical assistance
    - Substitutes
    - Stipends
    - Contract services
- Equipment inventories

Budget data includes:
- Budgets and supporting worksheets/ledgers
- General ledger and budget analysis reviews
- Purchased Professional Services Contracts and supporting documentation

- Timesheets
- Stipend information
- Substitute information
- Expenditure reviews

Each grant administrator or designee will also keep specific documentation for the grant they administer. Grant specific documentation includes:

Title I, Part A (refer to the Federal Programs Monthly School Calendar/Title I Checklist)

- Paraprofessional Assignment Forms, schedules, and maps
- Title I teacher schedules
- Data Analysis Data Dashboard Spreadsheets
- Schoolwide Plan Checklists
- Comprehensive Needs Assessment and Improvement Plan meetings and feedback
- Logic models
- Justification of Budget Items
- Title I Private School Proportionate Share
- FTE enrollment
- Free/Reduced data & Direct Certification
- Resource Allocation Methodology/Plan
- Rank-order lists
- Calculation of set-asides
- Notices to parents of participating English Learners

Neglected and Delinquent

- Annual Survey of Institutions for Neglected and Delinquent Children
- Services provided to neglected students
- Evidence of technical assistance

Homeless

- List of homeless children and unaccompanied youth
- Professional development received by the homeless liaison
- Documentation notifying stakeholders of the homeless liaison's contact information
- Collaborative planning agendas with the Transportation Department
- Evidence of comparable services for homeless students
- Evidence of collaboration with agencies to support homeless children and youth

Foster Care

- Collaborative planning agendas with local child welfare agencies
- Foster care log

Family School Partnership Program (refer to the Monthly Calendar for School-Level Parent Engagement/Title I Checklist)

- School Family Liaison professional learning
- District and school staff training
- Evidence of communication in multiple languages

- Evidence of parent-teacher conferences
- Evidence that childcare was offered at least once per school
- District and School Parent Engagement Policies with required components
- School-Parent Compacts with required components
- Weekly school newsletters
- Title I Annual Meetings
- Curriculum/Academic Nights (completion of two)
- Workshop/Meeting attendance
- Stakeholder feedback and input (Reservation of funds, policy, compact, building staff capacity, improvement plan) at stakeholder meetings, online, via email, and through feedback forms
- Parent contacts
- Checklists (Title I Data Card)
  - Checklist for Parent and Family Engagement Input
  - Checklist for Distribution
  - Checklist for Building the Capacity of School Staff
  - Checklist for Building the Capacity of Parents
- Evidence of distribution of policies

School Improvement 1003(a)

- Correspondence between the district and school(s)
- Technical assistance meetings
- Professional learning and training documentation
- Communication with GaDOE and West Georgia RESA
- School Comprehensive Needs Assessment and Improvement Plan with supporting data
- Data analysis on an ongoing basis to target areas needing improvement

Title I, Part C

- SIS report with migrant students
- Communication regarding migrant students
- Occupational surveys
- Student data reports including quarterly grades enrollment

Title II, Part A

- Teacher remediation plans and supporting documentation
- Evidence that paraprofessionals have met federal, state, and district professional qualification requirements
- Evidence of course and teacher assignment data (certified/classified personnel information)
- Evidence of Professional Learning Plans/Professional Learning Goals
- FTE enrollment
- Free/Reduced data & Direct Certification
- Previous year's effectiveness plan with source documentation
- Equitable services
- Current year's Budget Assertions and Effectiveness

- Progress toward monitoring and implementing the equity plan
- Distribution of 20-day parent notifications
- Distribution of Parent Right to Know Notification

Title III, Part A

- Home Language Survey data
- ACCESS test data
- WIDA Screener data
- ESOL permanent records with test data, parent notifications, and services

Title IV, Part A

- Method to prioritize distribution of funds to schools (if applicable)
- Evidence of targeting funds for specific activities to support
  - Well-rounded educational opportunities
  - Support safe and healthy students
  - Support the effective use of technology
- Logic

IDEA

- Paraprofessional Assignment Form, schedules, and monthly logs
- Exceptional Education teaching schedules
- Collaborative planning agendas between departments
- Exceptional education Lead Teachers agendas
- Exceptional education professional learning agendas
- Mindset master list of trained participants
- Youth Mental Health trained participants
- Life Space Crisis Intervention participants
- Student Achievement Model participants
- PBIS meeting agendas
- School data (restraints, discipline, School-Wide Information System (SWIS))
- Cluster meeting agendas
- Treatment team meeting agendas
- Academic screening data

Corrective Action

Grant administrators and/or designees identify corrective action through monitoring. Monitoring includes the review of documentation, school visits, walkthroughs, meetings, phone calls, and professional learning. The district or school may be identified for corrective action. The purpose of corrective action is to identify any program operation deficiencies.

Grant administrators will discuss the identified issue with the appropriate administrator. Identification of the issue will also be provided in writing along with guidance for compliance and corrective action steps. The administrator will be given a deadline to meet for the corrective action. Based on the issue identified, additional technical assistance or professional learning may be provided to the administrator and/or staff.

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

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

Identification of High Risk Schools

The TCSS completes a risk assessment to monitor schools that may be at higher risk of not meeting the requirements of the program, federal regulations, or administrative procedures. The risk assessment is based on employee experience, school scores, meeting fiscal requirements, and compliance issues. Schools are rated on the following criteria:

- Principal Experience
- Bookkeeper Experience
- Hiring of Staff
- Latest CCRPI Score
- Percentage of Unspent Funds for the Previous Year
- Issues Identified During Walkthroughs or Documentation Review
- Submission of Title I Documents
- Submission of Required Changes to Title I Documents
- Missing Items on Physical Inventory

Schools are assigned points based on the rubric below.

Category	0 points	1 point	2 points	3 points
Principal Experience	≥ 1 Year Experience with Federal Grants as Principal in TCSS	Experienced Principal but New to Federal Grants	New Principal but has Federal Grant Experience	New Principal and New to Federal Grants
Bookkeeper Experience	≥ 1 Year Experience with Federal Grants as Bookkeeper	Less than a Full Year Experience	NA	NA
Hires Staff in a Timely Manner	No Delays in Hiring Staff	Some Delays in Hiring Staff	Major Delays in Hiring Staff or Staff Missing for the Majority of a Semester	Staff not Hired or Staff not Replaced

Latest CCRPI	80 and above	70-79	60-69	Below 60
Percentage of Unspent Funds in FY19	< 15% Unspent	15-25% Unspent	26%-40% Unspent	> 40% Unspent
Issues Identified During School Visits/ Documentation Review	None	1-2 Issues Identified	3-4 Issues Identified	> 4 Issues Identified
Submission of Federal Grant Documents	On time	Submits Late but No Reminders Needed	1 Reminder Needed	Multiple Reminders Needed
Submission of Required Changes to Federal Grant Documents	Makes Changes On time	Makes Changes Late but No Reminders Needed	1 Reminder Needed	Multiple Reminders Needed
Missing Items on Physical Inventory	No Items Missing	1-2 Items Missing	3-4 Items Missing	> 4 Items Missing

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

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

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

COMPREHENSIVE LEA IMPROVEMENT PLAN (CLIP) AND SCHOOLWIDE/TARGETED ASSISTANCE PLANS (ESSA: SEC. 1112, 1114, 1115; **SEC. 1003; SEC. 1306; SEC. 1423; SEC. 122; SEC. 3116; SEC. 4106; SEC. 5223; SEC. 5224; SEC. 6223; SEC. 6722; SEC. 9305)**

Comprehensive LEA Improvement Plan

Section 8305 of the Every Student Succeeds Act of 1965 (ESSA) as reauthorized by the Every Student Succeeds Act of 2015 (ESSA) states that a local educational agency receiving funds under more than one covered program may submit plans or applications to the State educational agency under those programs on a consolidated basis. The following federal programs are included in the Consolidated LEA Improvement Plan (CLIP):

- Title I, Part A – Improving the Academic Achievement of the Disadvantaged

- School Improvement 1003(a)
- School Improvement 1003(g)
- Title I, Part C – Education of Migratory Children
- Title I, Part A and Title I, Part D – Programs for Neglected and Delinquent Children
- Title II, Part A – Supporting Effective Instruction
- Title III, Part A – Language Instruction for English Learners and Immigrant Students
- Title IV, Part A – Student Support and Academic Enrichment
- Title V, Part B – Rural Education Achievement Programs (REAP)
- Individuals with Disabilities Education Act (IDEA) – Programs for Exceptional Students
- Title I, Part A and Title IX, Part A – McKinney-Vento Education for Homeless Children and Youth (EHCY)

The GaDOE has integrated the requirements for the planning across all programs into the CLIP. The Streamlined CLIP (S-CLIP) has two parts:

- LEA Consolidated Application (Plan)
  - S-CLIP Questions
  - Parent and Family Engagement Policy
  - Equity Action Plan
  - Foster Care Transportation Plan
  - Title I, Part C ID&R Plan (if applicable)
- Application Forms
  - Assurances
  - Prayer Certification
  - Budgets
  - Program Specific Worksheets
  - GEPA Statement

Process for Creation/Review of the CLIP

For the FY26 school year, the Troup County School System (TCSS) elected to complete the Streamlined CLIP (S-CLIP) Option.

The grant administrators participate in the CLIP webinar to learn the process and requirements from the GaDOE.

Then, the Director of Federal Programs, in collaboration with the Director of School Improvement and Assessment, set a timeline and work with a system team in the revision of the Comprehensive Needs Assessment (CNA), Continuous System Improvement Plan (CSIP), and CLIP.

Grant administrators also review their specific sections on the Comprehensive Needs Assessment. The sections include:

- IDEA – Exceptional Education – Director of Exceptional Education
- Title I, Part A – Director of Federal Programs
- Title I, Part A – District Parent and Family Engagement Coordinator/Foster Care Point of Contact
- Title I, Part A – Parent Engagement – District Parent and Family Engagement

Coordinator
- Title I, Part C – Education of Migrant – Director of Federal Programs
- Title I, Part D – Neglected or Delinquent – Director of Federal Programs
- Title II, Part A – Director of Federal Programs
- Title III, Part A – Director of Student Services
- Title IV, Part A - Student Support and Academic Enrichment
- Title V, Part B – Rural Education Achievement Programs (REAP)
- Title IX, Part A – McKinney Vento – Coordinator of Student Assignment/District McKinney-Vento Liaison
- Equity Action Plan – Director of Federal Programs

After review/revision of the CNA, the data is analyzed to identify trends and patterns, overarching needs and root cause.

Meetings are held for stakeholders for revision/input on the District Parent and Family Engagement Policy. Flexible meeting times are offered. Additionally, a feedback form is placed on the district and school websites for stakeholders to provide input on the revision process. During each meeting, the format of the policy is discussed as well as revisions through discussion. The different components of the policy are discussed including:
- What is Title I?
- Strengthening Engagement
- Adoption
- Contact Information
- Jointly-Developed District Policy for Shared Student Achievement
- Technical Assistance
- Coordination of Services
- Building Capacity of School Staff
- Annual Evaluation
- Building Capacity for Parent and Family Engagement
- Reservation of Funds
- Accessibility
- Building Capacity of Parents

Discussions are also held on making the language more parent-friendly. Stakeholders submit their feedback on a feedback form.

The Director of Federal Programs, the Director of Transportation, the Foster Care Point of Contact and the Troup County Division of Family and Children Services (DFCS) Director meet to develop the Foster Care Transportation Plan and ensure educational stability for children in foster care including:
- A child in foster care remains in his or her school of origin, unless it is determined that remaining in the school of origin is not in that child's best interest
- If it is not in the child's best interest to stay in his or her school of origin, the child is immediately enrolled in the new school even if the child is unable to produce records normally required for enrollment and
- That the new (enrolling) school immediately contacts the school of origin to obtain relevant academic and other records.

The Foster Care Point of Contact also coordinates with the Director of Transportation for transportation of children in foster care.

Verifying Participation of Stakeholders

The TCSS actively seeks input from stakeholders as part of the CNA, CSIP and CLIP process in multiple ways. Internal and external stakeholders are invited to meetings. Information is shared on the five systems (Coherent Instructional System, Effective Leadership, Professional Capacity, Family and Community Engagement and Supportive Learning Environment). Demographic and student achievement data is shared. Additionally, trends, patterns, strengths and/or challenges are shared. Stakeholders also receive information regarding the Equity Action Plan, equity interventions, district improvement goals and action steps. There is time allotted for feedback and discussion with the stakeholders. Stakeholders then give feedback on a feedback form for input and revision of the CNA, the Equity Plan, CSIP and CLIP.

System team members:

- Superintendent
- Assistant Superintendent of Curriculum, Instruction and Professional Learning
- Assistant Superintendent of Operations
- Director of Assessment and Accountability
- Executive Director of Teaching and Learning
- Executive Director of Student Success
- Executive Director of Exceptional Education and Student Support
- Director of Federal Programs
- Chief Human Resources Officer
- Chief Financial Officer
- Director of Technology
- Executive Director of Maintenance
- Director of Nutrition
- Director of Transportation

Other internal stakeholders are invited to meetings to share input and give feedback. If team members are not able to participate in a meeting, feedback may be gathered through email or Google Drive.
Internal stakeholders invited to participate include:

- Homeless Liaison
- Parent and Family Engagement Coordinator
- Foster Care Point of Contact
- Principals
- Assistant Principals
- Instructional Specialists
- Behavior Specialists
- ESOL Teachers
- Media Specialists
- Nurses
- Paraprofessionals
- Psychologists
- Translators
- Social Workers
- Exceptional Education Teachers
- Speech Language Pathologists

- Students in Secondary
- Teachers
- Parents

External stakeholders are also invited to give feedback on the CNA, CSIP and CLIP in multiple ways. Multiple meetings are offered. All stakeholders are invited to be a part of the process for review and revision of the CLIP.

All feedback is reviewed and considered during the CLIP revision process.

The Director of Federal Programs verifies that all groups of internal and external stakeholders are represented based on sign-in sheets that indicate the participants' role.

Selection of Evidence-Based Action Steps in the CLIP

During the creation/revision of the CLIP, the district identifies strengths and needs. From these strengths and needs, evidence-based interventions are selected to meet those needs based on one of the four evidence types:

- Strong Evidence – Supported by at least one randomized study
- Moderate Evidence – Supported by at least one quasi-experimental study
- Promising Evidence – Supported by at least one correlational study
- Demonstrates a Rationale – Supported by programs with a rationale based on high-quality ESSA research or a positive evaluation that are likely to improve student or other relevant outcomes and that are undergoing evaluation; supported by a logic model

The district uses one of the databases that have been developed to assist LEAs with identifying evidence-based interventions. The TCSS collects data on all initiatives. If the initiative is not on one of the databases or supported by a strong, moderate or promising study, the district develops a logic model for that initiative based on ESSA research. The TCSS uses GaDOE and district-developed logic models to demonstrate a rationale for initiatives.

Approval of the CLIP

The Director of Federal Programs consolidates the revisions and feedback for the final CLIP. The director utilizes the GaDOE CLIP Review Criteria to ensure that the district is meeting the CLIP criteria for each element. The director submits the plan to the Superintendent for final review/approval before submission. Once approved, the plan is submitted to the GaDOE through the Statewide Longitudinal Data System (SLDS).

Timeline

The timeline varies based on the release of the SLDS application and CLIP webinar. However, the general timeline for review/revision of the CNA, CSIP and CLIP is as follows:

July-September

- Receive Summative Data
    - Official Georgia Milestones Reports
    - Georgia Health Survey Reports

        - Graduation Rate
- Gathering Formative Data
    - Examples:
        - Attendance
        - Discipline
        - Reading Inventory
        - 9th Grade Failure Rate

October-December

- Quarter One CSIP Data Review
    - Review Formative Data
    - Focus on Subgroup Data/Gaps

- Receive College and Career Ready Performance Index
    - Climate Star Rating
    - Growth Information
    - Subgroup Closing the Gap

January

- Quarter Two CSIP Data Review
    - Review Formative Data
    - Focus on Subgroup Data/Gaps
    - Determine Professional Learning Needs
    - Add Action Steps
    - Revise Targets

February

- GaDOE CLIP Webinar(s)
- Both System and Schools Continue Collecting Data
- Stakeholder Meeting – Comprehensive Needs Assessment

March

- Quarter Three CSIP Data Review
    - Review Formative Data
    - Focus on Subgroup Data/Gaps
- Departments write action plans
- Budget process begins
- Schools begin writing SIP for next school year
    - Technical assistance provided as needed

April

- Posting of documents and feedback forms for stakeholder input on the District website
- Stakeholder meetings to provide input on the District Parent and Family Engagement Policy (District Improvement Forum)
- Stakeholder Meeting to provide input on the CNA/CSIP/CLIP (Internal and External)

May

- Quarter Four CSIP (End of Year) Data Review

- Focus on subgroup data/gaps
- Revisions Equity Plan and Required Questions due from grant administrators
- Stakeholder meetings to provide input on the CNA/CSIP/CLIP (Internal and External)
- Final revision of District Parent and Family Engagement Policy
- Meeting with DFCS to discuss the Foster Care Transportation Plan
- Coordination with transportation on the Foster Care Transportation Plan

June

- Additional stakeholder meetings (as needed) (Internal and External)
- Final revision of the Foster Care Transportation Plan
- Review of CLIP by System Directors and Cabinet

July

- Submission of CLIP by GaDOE deadline
- All School Improvement Plans are in place

Resolution Procedures for Unapproved CLIP

The Director of Federal Programs is responsible for reviewing, finalizing and submitting the CLIP. If the plan is not approved by the GaDOE, the Director of Federal Programs will work with the appropriate grant administrator based on the program feedback from the GaDOE to ensure that changes are made. The Director of Federal Programs will make the changes and submit the revised CLIP in SLDS for approval. This process will continue until the plan is approved.

School Improvement/Schoolwide/Targeted Assistance Program Plans

The TCSS has 12 schools that are Title I Schoolwide schools and 1 residential treatment facility school. Annually, TCSS participates in the review/revision of each School Improvement/ Schoolwide Plan.

Process for Creation/Review of the School Improvement/Schoolwide/Targeted Assistance Plans

The Director of Assessment & Accountability and Director of Federal Programs create a timeline for the review/revision of School Improvement /Schoolwide/ Targeted Assistance Plans. At an administrative meeting, information regarding the timeline and process is shared with administrators.

Technical assistance sessions are offered and technical assistance is also provided upon request.

Meetings are also held for stakeholders for revision/input on the School Parent and Family Engagement Policy. Flexible meeting times are offered.

Additionally, a feedback form is placed on the school website for stakeholders to provide input on the revision process. During each meeting, the format of the policy is discussed as well as revisions through discussion. The different components of the policy are discussed including:

- What is Title I?
- Jointly-Developed School Policy for Shared Student Achievement
- School-Parent Compact

- Annual Title I Meeting
- Communications
- Reservation of Funds
- Coordination of Services
- Building Capacity of School Staff
- Building Capacity for Family Engagement
- Parent and Family Engagement
- School Parent Resource Center
- Building Capacity of Parents

Stakeholders submit their feedback on a feedback form.

School Parent and Family Engagement Policies are submitted to the District Parent and Family Engagement Coordinator. The coordinator reviews each school's policy and requests corrections as needed.

The Director Assessment and Accountability and Director of Federal Programs review each plan to determine if the plan is complete and meets the criteria listed in the Schoolwide/Targeted Assistance Program Checklist. Data is reviewed to ensure that it supports identified initiatives. Additionally, budget requests are cross-referenced to identified needs and actions steps in the plan. The Schoolwide/Targeted Assistance Program Checklist is also reviewed for required schoolwide/targeted assistance components that were not covered in the plan. These requirements are then added to the plan. If additional data is needed, the principal is given a deadline for submission of data to complete the plan.

Verifying Participation of Stakeholders

A School Improvement Forum is held at every Title I school in the Spring for stakeholders to participate in the review/revision of the Comprehensive Needs Assessment and School Improvement Plan/Schoolwide/Targeted Assistance Plan at the school level. All stakeholders are invited to give input and discuss the revisions.

Guidance is provided to schools through the Director of Federal Programs and the District Parent and Family Engagement Coordinator regarding stakeholder input. The following stakeholder groups must be represented:

- Administrators
- Central office staff
- Certified staff
- Classified staff
- Support staff
- Parents
- Students (secondary)
- Community (business, faith-based organizations, general public)

Selection of Evidence-Based Action Steps in the School Improvement/Schoolwide/Targeted Assistance Plan

During the creation/revision of the School Improvement/Schoolwide/Targeted Assistance Plan, the school identifies strengths and needs. From these strengths and needs, evidence-based interventions are selected to meet those needs based on one of the four evidence types:

- Strong Evidence – Supported by at least one randomized study
- Moderate Evidence – Supported by at least one quasi-experimental study
- Promising Evidence – Supported by at least one correlational study
- Demonstrates a Rationale – Supported by programs with a rationale based on high-quality ESSA research or a positive evaluation that are likely to improve student or other relevant outcomes and that are undergoing evaluation; supported by a logic model

The district uses one of the databases that have been developed to assist LEAs with identifying evidence-based interventions. Each school collects data on all initiatives. If the initiative is not on one of the databases or supported by a strong, moderate or promising study, the district develops a logic model for that initiative based on ESSA research.

Approval of the School Improvement/Schoolwide/Targeted Assistance Plan

The Director of Assessment and Accountability and Director of Federal Programs check all revisions to the plan to ensure that all requests from principals are complete. If revisions are needed, the Director Assessment and Accountability and/or the Director of Federal Programs follow-up with the principal via email and/or phone until the revisions are complete. The Schoolwide and/or Targeted Assistance Program Checklist is sent to schools with the Title I Schoolwide/Targeted Assistance Template.

Timeline

The general timeline for review/revision of the School Improvement/Schoolwide/Targeted Assistance Plan for each school is as follows:

- March
  - Stakeholder Meetings for input on Comprehensive Needs Assessment
  - Staff input/revision of the Parent and Family Engagement Policy, School Improvement Plan, and Budget
  - Stakeholder meetings for input/revision of the Parent and Family Engagement Policy, School Improvement Plan, and Budget
- April
  - Stakeholder meetings for input/revision of the Parent and Family Engagement Policy, School Improvement Plan, and Budget
  - Submission of draft School Parent and Family Engagement Policy
- May
  - Approval of final School Parent and Family Engagement Policy
  - End of year submission of Title I documentation
- June-September
  - Revisions completed for Comprehensive Needs Assessment/School Improvement Plans

Resolution Procedures for Unapproved Plans

If principals do not submit the data in the process outlined above to complete their School Improvement/Schoolwide/Targeted Assistance Plan, the Director of Assessment and Accountability and the Director of Federal Programs involve the Executive Director of Teaching and Learning to ensure completion and approval of the plan.

CONSULTATION WITH PRIVATE SCHOOLS (ESSA: Sec. 1117 and 1120; Sec. 2102(b)(2)(E); Sec. 8501(a)(5); Sec. 8501(c); Sec. 4106(e)(2)(B); 34 CFR Part 200.62-200.67; 34 CFR Part 200.77 (f))

Under the Every Student Succeeds Act, the Troup County School System (TCSS), after timely and meaningful consultation with appropriate private school officials, shall provide children enrolled in private elementary and secondary schools, on an equitable basis, educational services or other benefits that address their needs and shall ensure that teachers and families of the children participate, on an equitable basis, in professional learning and parent involvement activities developed, respectively.

- Such educational services or other benefits, including materials and equipment, shall be secular, neutral, and non ideological.
- Educational services and other benefits for such private school children shall be equitable in comparison to services and other benefits for public school children. Services shall be provided in a timely manner.
- Expenditures for educational services and other benefits to eligible private school children shall be equal to the proportion of funds allocated to participating school attendance areas based on the number of children from low-income families who attend private schools.
- The district may provide services under this section directly or through contracts with public and private agencies, organizations, and institutions.

Timely and Meaningful Consultation

Timely and meaningful consultation is required in order to ensure the equitable participation of private school students, teachers, and, in some programs, parents. Timely consultation should begin early enough for the entire process of program design and development to be completed, for exploring the option of third-party providers, and for services to begin by the start of the school year. Timely consultation requires that the district provide advance notice of consultation meetings to private school officials. Meaningful consultation covers all required topics and affords private school officials a genuine opportunity to express their views. Effective consultation is ongoing, two-way communication, and discussion of the best ways to meet the needs of private school students and teachers under the provisions of the particular program.

To ensure timely and meaningful consultation, the district will consult with appropriate private school officials during the design and development of programs on issues such as:

- How the children's needs will be identified;
- What services will be offered;
- How, where, and by whom the services will be provided;
- How the services will be academically assessed and how the results of that assessment will be used to improve those services;
- The size and scope of the equitable services to be provided to the eligible private school children, and the proportion of funds that is allocated for such services;
- The method or sources of data that are used to determine the number of children from low- income families in participating school attendance areas who attend private schools;
- How and when the agency will make decisions about the delivery of services to such children, including a thorough consideration and analysis of the views of the private school officials on the provision of services through a contract with potential third-party providers;

and
- How, if the district disagrees with the views of the private school officials on the provision of services through a contract, the district will provide in writing to such private school officials an analysis of the reasons why the district has chosen not to use a contractor.

For students with disabilities, the following information will be covered as part of the consultation:
- The child-find process for home school students – how home school students can participate equitably and how parents/guardians will be informed of the child find process and procedures. The district must locate, identify and evaluate all children suspected of having a disability within their jurisdiction. Activities should be similar to and completed within comparable time period of students in the public schools.
- What the proportionate share amount is and how it was calculated.
- The consultation process itself and how it will operate throughout the school year so that eligible students can participate in exceptional education and related services. Services must be comparable in quality, not quantity.
- How, where, and by whom proportionate share funds will be allocated, including a description of the types and amounts of services that will be provided. The district must make the final decisions with respect to the services to be provided (even if there are insufficient funds to serve all students with disabilities) after receiving views from the participants.
- How the district, if it disagrees with the views of the private schools on services, will provide a written explanation of why it chose not to follow the views of the private schools.

Such consultation shall include meetings of the district and private school officials and shall occur before the district makes any decision that affects the opportunities of eligible private school children to participate in programs. Such meetings shall continue throughout implementation and assessment of services. Consultation shall include a discussion of service delivery mechanisms the district can use to provide equitable services to eligible private school children. The consultation must also include a thorough consideration and analysis of the views of the officials of the private schools on the provision of services through a contract with a third-party provider. If the district disagrees with the views of the officials of the private schools on the provision of services through a contract, the district must provide in writing to the officials of the private schools the reasons why the district chooses not to use a contractor.

The district will maintain documentation showing that it has:
- Informed annually the private school officials of the various ESSA education programs available to their students and teachers;
- Checked non-profit status for private schools: https://ecorp.sos.ga.gov/
- Engaged in timely consultation, allowing for meaningful discussion between the LEA and the private school officials regarding services and benefits;
- Identified private school students' and teachers' needs;
- Allocated a per-pupil amount of funds for services to private school students and teachers that is equal to the per-pupil amount for services to public school students and teachers;
- Provided services, programs, materials, and resources;
- Evaluated programs and services for effectiveness; and
- Adequately addressed problems and formal complaints raised by private school officials.

The district will provide to the GaDOE a written affirmation signed by officials of each

participating private school that the consultation required by this section has occurred. Written affirmations will be maintained by the district along with additional private school correspondence.

Additionally, for students with disabilities, each participant must be given an affirmation form to sign indicating that the five essential points were discussed and views of the parent/guardian of the home school student were considered.

The TCSS must contact all private schools with children residing within the district's public school attendance areas, regardless of whether the private school is located within or outside of the district, to invite the private schools to participate in TCSS federal programs.

Private schools with children residing in the district's participating public school attendance areas, regardless of whether the private school is located within the district, may be eligible to participate in the following grants:

- Title I, Part A – Improving the Academic Achievement of the Disadvantaged
- Title VI, Part B – Exceptional Education (IDEA)

Private schools with children residing in the district's participating public school attendance areas that are located within the district may be eligible to participate in the following grant:

- Title II, Part A – Supporting Effective Instruction
- Title III, Part A – Language Instruction for English Leaners and Immigrant Students
- Title IV, Part A – Student Support and Academic Enrichment

<u>Timeline for Consultation for Private Schools</u>

The district will follow the Timeline for LEA Federal Programs Coordination and Consultation with Private School Officials located on the GaDOE website.

Month(s)	**Activity**
July – October/November	- LEAs invite private schools to participate in the following fiscal year -The Federal Programs Director checks non-profit status of private schools: https://ecorp.sos.ga.gov/
October - December	- LEAs conduct initial overview and consultation
December	- LEAs upload private school templates into the Statewide Longitudinal Data System (ES4PS Application) • Initial Consultation for Provision of Services/Notification of Intent • List of Private Schools Participating in Federal Programs
January	- LEAs consult with private schools regarding services for the next year
June	- LEAs upload private school template into the Statewide Longitudinal Data System (ES4PS Application) • Private School Consultation for Provision of Services

October (End Grant)	- LEAs upload private school template verifying receipt of services into the Statewide Longitudinal Data System (ES4PS Application) • Private School Consultation for Provision of Services

Determining Private Schools for Invitation to Consult on Federal Programs

The district uses the Private School Report of Students Enrolled (Form DE1111) form received to determine private schools to invite to consult on the TCSS federal grants for the upcoming fiscal year. Private schools are required to submit the Form DE1111 to the district within 30 days after the beginning of the school year. Private schools are also required to submit a Form DE1111 to the district at the end of each month for students who enroll or terminate enrollment during the immediately preceding school month.

Form DE1111s are collected by the Federal Programs Department for recording. A list of private schools is compiled based on Form DE1111s received.

Addresses for private school students listed on the Form DE1111 are reviewed to ensure the students reside in Troup County. Addresses for students that are located in a different county are notated with the correct county of residence.

Notification of Invitation to Consult on Federal Programs

In October, invitations are sent through ES4PS to consult on the TCSS federal grants for the upcoming fiscal year to all private schools with children residing in Troup County. Invitations to consult include:

- District name
- Current date
- Fiscal year for which the private school is being invited to participate
- Program descriptions for all available programs for which the private school is being invited to participate
- Initial consultation meeting date, time, and location
- Name and contact information of the district representative who can assist the private school

Documentation is maintained through the ES4PS system.

Collection of the Private School Invitation to Consult Forms

All documentation is electronic and maintained in the ES4PS system. Follow up emails and phone calls are documented at the district.

Late Submission of Private School Report of Students Enrolled (Form DE1111)

In the event that a Form DE1111 is received after the initial distribution of invitations to consult for the district initial consultation meeting, the private school will still receive an invitation to consult.

For Form DE1111s received less than three weeks prior to or after the district initial consultation meeting, a district initial consultation meeting will be scheduled to accommodate the private school if they choose to consult on TCSS federal programs.

Responses Not Received - Invitations to Consult Letters

Invitation emails will contain the date sent and maintained in the ES4PS system. Contact will be made to the private school to notify them that a response has not been received. Coordination will be made with the private school to resend the invitation.

Communication with the private school will be entered on the private school communication log for the GaDOE and follow-up documentation will be maintained. This may include emails and/or phone logs.

Initial Consultation Meetings

Statewide Initial Consultation Meetings: (**IF APPLICABLE**)
The State Ombudsman disseminates communication to the private schools and districts regarding statewide consultation meetings. The State Ombudsman maintains registration information for participating private schools and districts. Registration information maintained by the State Ombudsman on the GaDOE website will be periodically checked for registration by private schools requesting to consult with TCSS on federal grants.

District personnel will attend statewide initial consultation meetings that private schools with children residing in Troup County have registered to attend. District personnel will include representatives who administer or are knowledgeable on TCSS federal grants in order to consult with the private schools. Contact information for each grant to include name, email, and phone number is provided for attending private schools.

In the event a private school has registered for a statewide initial consultation meeting and listed Troup County as a district with which they request to consult and the district has not received a Form DE1111 from the private school, the Title I Administrative Assistant will contact the private school to request a Form DE1111. Upon receipt, the name of the private school will be added to the list of private schools that have previously submitted a Form DE1111.

The State Ombudsman provides districts with the statewide initial consultation meeting agenda, sign-in sheets and handouts. These documents are maintained by the district along with the district initial consultation meeting documentation.

District Initial Consultation Meetings:
The TCSS will initially schedule at least one district initial consultation meeting for private schools unable to attend a statewide initial consultation meeting. District meeting dates will be scheduled during November/December after the statewide initial consultation meeting options. District personnel who administer or are knowledgeable on TCSS federal grants will attend all district initial consultation meetings. The meeting may be held face-to-face or virtual.

Private schools will be informed of the following information regarding federal grants during

district initial consultation meetings:

- How the children's needs will be identified;
- What services will be offered;
- How, where, and by whom the services will be provided;
- How the services will be assessed and how the results of the assessment will be used to improve those services;
- The size and scope of the equitable services to be provided to the eligible private school children, teachers, and other educational personnel, the amount of funds available for those services, and how that amount is determined;
- How and when the agency, consortium, or entity will make decisions about the delivery of services, including a thorough consideration and analysis of the views of the private school officials on the provision of services through potential third party providers; and
- Whether the agency, consortium, or entity shall provide services directly or through a separate government agency, consortium, or entity, or through a third-party contractor;
- Administrative costs;
- The method/sources of poverty data used (Title I only);
- When services will be provided (Timeline for LEA Federal Programs Coordination and Consultation with Private School Officials) (Title I only); and
- Whether to provide equitable services to eligible private school children—
    - by creating a pool or pools of funds with all of the funds allocated under subsection (a)(4)(C) based on all the children from low-income families in a participating school attendance area who attend private schools; or
    - in the agency's participating school attendance area who attend private schools with the proportion of funds allocated under subsection (a)(4)(C) based on the number of children from low-income families who attend private schools (ESSA 8501(c)).
- The district's complaint procedures for federal programs
- The district's fraud, waste, abuse, and corruption prevention policy (Policy DIE-Fraud Prevention)

The district will provide ongoing guidance on policies and written procedures to participating private schools as applicable to services received. Policies and procedures reviewed may include:

- Travel
- Stipends
- Rank ordering for services (Title I only)
- Private school equipment and inventory
- Professional learning
- Parent engagement
- Program evaluation
- Compliance documentation required for applicable grants

The following documentation is maintained by the district even if no private school representative attends the meeting:

- Meeting agenda
- Meeting sign-in sheet with roles of attendees
- Meeting handouts
- Meeting minutes
- Completed Private School Initial Consultation and Notification of Intent

Consultation with Parent/Guardians of Home School Students with Disabilities

Home school children with disabilities who reside within the district's public school attendance zones must receive an opportunity for equitable participation in the services funded with Federal Part B funds that the district has determined after consultation, to make available to home school children with disabilities. It is the responsibility of TCSS to locate, identify, and evaluate all home school children with disabilities who reside within the district's public school attendance zones.

A timely and meaningful consultation must occur before any decisions are made that will affect the participation of home school children in Part B programs. Decisions about services may not be made in advance. A unilateral offer of services by the district without discussion is not adequate consultation and does not meet the basic requirements of the consultation process. The district is responsible for making final decisions about all aspects of home school children with disabilities.

The Exceptional Education Departments notifies parents/guardians of home school children with disabilities of the consultation meeting by U.S. mail or by email in May for participation in Part B programs for the upcoming school year. The consultation meeting should be attended by the following:

- The TCSS Executive Director of Exceptional Education and Support Services or designee
- Parents or parent representatives of eligible home school children with disabilities

When conducting the timely and meaningful consultation process, the district must cover the following items during the meeting:

- The child-find process for home school students – how home school students can participate equitably and how parents/guardians will be informed of the child find process and procedures. The district must locate, identify and evaluate all children suspected of having a disability within their jurisdiction. Activities should be similar to and completed within comparable time period of students in the public schools.
- What the proportionate share amount is and how it was calculated.
- The consultation process itself and how it will operate throughout the school year so that eligible students can participate in exceptional education and related services. Services must be comparable in quality, not quantity.
- How, where, and by whom proportionate share funds will be allocated, including a description of the types and amounts of services that will be provided. The district must make the final decisions with respect to the services to be provided (even if there are insufficient funds to serve all students with disabilities) after receiving views from the participants.

If there is a disagreement, the district must provide to the parent/guardian of the home school student, a written explanation of the reasons why the district chose not to accept the recommendations of the parent/guardian of the home school student.

The district will maintain documentation from the consultation meeting. This may include agendas, sign-in sheets, and handouts. Additionally, each participant must be given an affirmation form to sign indicating that the essential points were discussed and views of the parent/guardian of the home school student were considered. If the parent/guardian of the home school student refuses to sign an affirmation form, the form should be maintained with a note to that effect.

Ongoing Consultation with Participating Private Schools

For participating private schools with children residing in the district's public school attendance zones that meet the non-profit status requirements, ongoing individualized consultation will occur between district and private school representatives according to the Timeline for LEA Federal Programs Coordination and Consultation with Private School Officials located on the GaDOE website. Consultation may include on-site meetings or trainings, emails, and phone calls. A private school communication log will be maintained by the Director of Federal Programs and Title I Administrative Assistant to record communication with the private school.

Consultation will result in the development and implementation of the district's written plan to serve eligible students, teachers and parents in the private school. Ongoing consultation allows for the timely and efficient resolution of any issues that may arise concerning implementation of services.

MAINTENANCE OF EFFORT FOR ESSA (Sec. 1120A; Sec. 1114, 1118)

The Troup County School System may only receive funds under a covered program for any fiscal year if the GaDOE determines that the district has maintained fiscal effort (that either the combined fiscal effort per student or the aggregate expenditures of the district and the state with respect to the provision of free public education by the district for the preceding fiscal year was not less than 90 percent of the combined fiscal effort or aggregate expenditures for the second preceding fiscal year). Covered programs include:

- Title I, Part A
- Title I, Part, D
- Title II, Part A
- Title III, Part A
- Title IV, Part A
- Title V, Part B
- Title IX, Part A--McKinney-Vento Act

The GaDOE will reduce the amount of the allocation of funds under a covered program in any fiscal year in the exact proportion by which the district fails to meet the requirement (if the district falls below 90 percent of both the combined fiscal effort per student and aggregate expenditures (using the measure most favorable to the district) for one or more of the five immediately preceding fiscal years).

The GaDOE tests Maintenance of Effort (MOE) on behalf of the district through the following process:

- The GaDOE will test aggregate expenditures of state and local funds to determine if the MOE standard is met. If GaDOE determines that the district has met MOE based on aggregate expenditures of state and local funds, no further calculations are required.
- If the district does not meet MOE based on aggregate expenditures of state and local funds, the district may test combined state and local funds per FTE using the worksheet provided by the GaDOE.

The U.S. Department of Education may waive the MOE requirements if it has determined that a waiver would be equitable due to exceptional or uncontrollable circumstances, such as natural disasters or a significant decline in the amount of local funds of the district.

Procedure for Calculating Maintenance of Effort (MOE) Based On Aggregate Expenditures of State and Local Funds

If the TCSS does not meet MOE through the state calculations, it may test MOE through the Worksheet for Computing Aggregate or Average Per-Pupil Expenditure from General Fund (Fund Code 100).

Worksheet for Computing Aggregate or Average Per-Pupil Expenditure from General Fund (Fund Code 100)

For _____ LEA

Source of data: Financial Report for Year Ending June 30, _____

Current Expenditures			
	Total of Funds (fund code 100) (1)	Capital Outlay (Equipment) All 700 Objective Codes in each series (2)	Column 1–Column 2 (3)
1000			0.00
2100			0.00
2210			0.00
2220			0.00
2300			0.00
2400			0.00
2600			0.00
2700			0.00
Total	0.00	0.00	0.00
Total of Column (3) Rounded to the Nearest $100			0

Steps for Computing the Aggregate of Per-Pupil Expenditure:

- The worksheet must be completed using a financial expenditure report for general fund (fund 100) for the two preceding years. Expenditures for each function code should be entered. Function codes include:
  - 1000
  - 2100
  - 2210
  - 2220
  - 2300
  - 2400
  - 2600
  - 2700
- Capital outlay equipment (all 700 object codes) for the same function codes

listed above must be entered.

- The "Total of Funds" minus "Capital Outlay" is entered in column three.
- The column three total, or aggregate expenditures, should be rounded to the nearest $100.

The rounded total from column three is entered in the per-pupil table shown below.

- The October FTE count minus the Pre-K total for the two preceding years is entered in the FTE cell as shown in the chart below.

Total Col. 3		FTE		Per-Pupil
0.00	÷		=	
Per-Pupil Rounded to the Nearest $10				

- The total of column three is divided by the FTE count to determine the per-pupil expenditure. The per-pupil expenditure should be rounded to the nearest $10.
- The district will follow this process for the two preceding years.
- The district will meet MOE if the per-pupil rate of the preceding year is within 90 percent of the year prior to the preceding year.

MAINTENANCE OF EFFORT FOR IDEA (34 CFR 300.203, 34 CFR 300.204, 34 CFR 300.205)

The GaDOE must establish the Troup County School System's eligibility for federal funds by determining that the district budgets, for the education of children with disabilities, are at least the same amount, from at least one of the following sources, as the district spent for that purpose from the same source for the most recent fiscal year for which information is available:

- Local funds only
- The combination of State and local funds
- Local funds only on a per capita basis
- The combination of State and local funds on a per capita basis

Funds provided to the district under Individuals with Disabilities Education Act (IDEA) must not be used to reduce the level of expenditures for the education of children with disabilities made by the district from local funds below the level of those expenditures for the preceding fiscal year. A district meets this standard if it does not reduce the level of expenditures made by the district for the education of children with disabilities from at least one of the following sources below the level of those expenditures from the same source for the preceding fiscal year:

- Local funds only
- The combination of State and local funds
- Local funds only on a per capita basis
- The combination of State and local funds on a per capita basis

The Troup County School System ensures Maintenance of Effort (MOE) for IDEA as outlined in 34 CFR 300.203, 34 CFR 300.204, and 34 CFR 300.205.

Supplement not Supplant

IDEA funds may be used only to supplement and not supplant State and local funds. In order to demonstrate compliance with the supplement requirement, the Troup County School System utilizes the Maintenance of Effort (MOE) Compliance and Eligibility Worksheet provided by the GaDOE to meet the following two standards:

- The system must budget at least as much as they expended in the last year for which information is available, and
- The system must actually expend at least as much as they expended in the previous year (comparison year).

The MOE Compliance and Eligibility Worksheet is uploaded annually before IDEA budgets are approved.

Maintenance of Effort Compliance and Eligibility Worksheet

The Chief Financial Officer (CFO) or designee works in conjunction with the Director of Exceptional Education to fill out the MOE Compliance and Eligibility Worksheet for submission with the Consolidated Application. In the fall, data is entered by the CFO after the prior fiscal year has been closed.
The worksheet compares the previous two years of overall expenditures and per capita expenditures.

The MOE Compliance and Eligibility Worksheet includes two tabs:

- Final Projections
- Calculation Worksheet

The CFO begins entering financial data in the Calculation Worksheet using the operations report. The operations report is sorted by State/local funds and programmatic category and reflects actual expenditures spent during the fiscal year requested. The CFO first runs the report by Fund 100 (General Fund) and the Exceptional Education programmatic codes. The list of programmatic codes are as follows:

- 2011: Students with Disabilities
- 2021: Category I
- 2023: Local – Category I
- 2031: Category II
- 2033: Local – Category II
- 2041: Category III
- 2043: Local – Category III
- 2051: Category IV
- 2053: Local – Category IV
- 2061: Category V
- 2063: Local – Category V
- 2081: Non-Instructional Exceptional education Expenditures
- 2310: Tuition for Multi-Handicapped Children (N/A for TCSS)
- 2620: Preschool Handicapped State Grant
- 2810: Rule 10 – Exceptional education (Support Costs)

Actual expenditures are entered into the applicable cells in the MOE worksheet. Currently, the Exceptional Education Department (non-direct instruction) expenditures are primarily coded to

program 0000. Therefore, unduplicated exceptional education expenditures that are not attached to an instructional exceptional education program code are included in the "Other" cell under the Local Expenditures section of the worksheet. The system will be transitioning to the use of program 2081 for these expenditures in the future.

After actual expenditures are entered into MOE worksheet, the CFO runs a budget analysis report to input budget data for the current fiscal year into the cells corresponding to the same programmatic categories. The report is run with the same criteria, General Fund (100) and the Exceptional Education program codes. The data is entered into the cells to make an accurate comparison of expected expenditures with the actual expenditures from the prior fiscal year.

The CFO uses the Child Count FTE report that corresponds to the fiscal year being reported. For example, Child Count FTE 18-1 is used for FY18. The same number is used for the projected FTE in the current fiscal year (e.g. Child Count FTE 18-1 for FY19). The MOE worksheet calculates and determines the State/Local Expenditures Per Pupil Expenditures.

After completion of the Calculation Worksheet tab, the CFO enters the required data on the Final Projections tab. The CFO uses the GaDOE portal to complete the information required for the

Comparison Year (Last Met Effort). This information is found by logging into the portal, clicking on Consolidated Application, and choosing Exceptional Education – MOE.

Once the financial data has been entered into the worksheet, the MOE Compliance and Eligibility Worksheet will state whether or not the system has met compliance. To date, the system has met compliance.

If the TCSS was not in compliance, the Chief Financial Officer would conduct research to determine if there were Exceptions (§300.204) or Adjustments (§300.205) that would affect MOE. The CFO would work in conjunction with the Director of Exceptional Education and the GaDOE IDEA Program Manager to provide documentation required under these provisions. Documentation would include the MOE Eligibility Form with projected expenditures for the current year, exception requirement forms with supporting evidence verifying expenditures, and correction forms (if applicable) with supporting evidence verifying expenditures.

The MOE Compliance and Eligibility Worksheet is submitted to the Director of Exceptional Education to be uploaded into the Consolidated Application prior to approval.

COMPARABILITY (Sec. 1118(3)(A))

The Troup County School System may only receive federal funds under Title I, Part A if the district is using state and local funds to provide services that, taken as a whole, are substantially comparable in each school. Demonstrating comparability is a prerequisite for receiving Title I, Part A funds and must be completed annually.

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

schools receive federal funds.

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

Comparability Criteria and Methods

The TCSS may determine comparability of each of its Title I schools on a districtwide basis or a grade-span basis. The comparability requirement does not apply to a district that has only one school at each grade span. Grade spans should reflect the district's organization of elementary, middle and high school levels. The grade spans should match the grade spans reported in the GaDOE Consolidated Application. The grade spans for the TCSS are K-5, 6-8 and 9-12. The district may also exclude schools that have fewer than 100 students. The GaDOE has established the student/instructional staff ratio as the method for districts to use to determine comparability. The number of students in a school is defined as the total enrollment in the school minus the pre-kindergarten enrollment in the school.

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

- When using student/instructional staff ratios to compare the average number of students per instructional staff in each Title I school with the average number of students per instructional staff in non-Title I schools, a district may consider a Title I school comparable if its average does not exceed 110-percent of the average of non-Title I schools.
- The district may choose to compare large Title I schools in a particular grade span to large non-Title I schools in that grade span and small Title I schools in that grade span to small non-Title I schools in that grade span. In general, schools may be split into two groups if the largest school has an enrollment that is two times the enrollment of the smallest school.
- The district may also compare high-poverty Title I schools to low-poverty Title I schools. A district may use up to 50-percent of the schools or attendance areas in the group having low concentrations of children from low-income families to generate the low-poverty average that will be used for comparison with the high-poverty schools. A school is considered high poverty if it has a free or reduced-price meals (FRM) percentage greater than or equal to 60-percent.

For districts with all Title I schools:

- The district may compute the average student/instructional staff ratio for all its schools and consider a school comparable if the student/instructional staff ratio falls within 90 to 110-percent of the average for all schools.
- If all schools are not comparable using the method above, the district may break the schools down by grade span to determine comparability. If the student/instructional staff ratio for each school in the grade span falls within 90 to 110-percent of the average for all schools within the grade span, the schools would be considered comparable.
- A district is also permitted to compare large Title I schools and small Title I schools within a particular grade span. In general, schools may be split into groups if the largest school has an enrollment that is two times the enrollment of the smallest school.
- Additionally, a district may divide its schools by poverty rate and compare the student/instructional ratio of its high-poverty Title I schools to the average ratio of all the

high-poverty schools and the student/instructional staff ratio of each low-poverty school to the average ratio of all the low-poverty schools. A district may use up to 50-percent of the schools or attendance areas in the group having low concentrations of children from low-income families to generate the low-poverty average that will be used for comparison with the high-poverty schools. A school is considered high poverty if it has a FRM percentage greater than or equal to 60-percent.

Title I provides that a district need not include unpredictable changes in student enrollment or personnel assignments that occur after the beginning of a school year in determining comparability of services.

Instructional Staff Members Included in the Comparability Count

The district must consistently include the same categories of staff members in the ratios for both Title I and non-Title I schools. Instructional staff may include teachers and other personnel assigned to schools who provide direct instructional services, including music, art, and physical education teachers; guidance counselors; speech therapists; and media specialists as well as other personnel who provide services that support instruction, such as school social workers and psychologists.

In calculating comparability, the district may include only staff paid with state and local funds. Other staff that would be excluded are principals, assistant principals, custodians, cafeteria personnel, school nurses, security personnel, pre-kindergarten teachers, pre-kindergarten paraprofessionals, secretaries, and non-instructional paraprofessionals.

Who to Count	Who Not to Count
Instructional Staff ● Core subject teachers ● Art teachers ● Music teachers ● Physical education teachers ● Instructional paraprofessionals ● Guidance counselors ● Speech therapists ● Media specialists Staff Who Provide Services that Support Instruction ● School social workers ● Psychologists	● Federally paid staff ● Pre-K staff (teachers and paraprofessionals) ● Privately paid staff ● Cafeteria staff ● Custodial staff ● Nurses ● Security staff/officers ● Bus drivers ● Secretaries ● Clerical staff ● Principals ● Assistant Principals ● Non-instructional paraprofessionals

Procedures for Completing the My GaDOE Portal Comparability Report

In the My GaDOE Portal, the grant administrator for Title I, Part A will run the Comparability Report. The report runs every possible permutation available to demonstrate comparability. It automatically incorporates current full-time equivalent (FTE), CPI, and poverty data collected by the GaDOE in the fall of each school year.

After logging in to the My GaDOE Portal, the grant administrator will go to Title I Comparability > LEA Comparability Reporting. The grant administrator will complete the contact information on the Contact Info tab.

On the Comparability Reporting Tab, the grant administrator will run Comparability. After running comparability, the report will state if the system is comparable. If all schools are comparable, the grant administrator and superintendent will submit the Title I Comparability Application to the GaDOE. If one or more schools are not comparable, then the grant administrator will work with the Title I Area Specialist to meet comparability.

Procedures for Meeting Comparability with Self-Reported Data

If one or more schools on the GaDOE Comparability Report are not comparable, the Title I grant administrator will work with his/her Title I Area Specialist to adjust the current data if error(s) are found on the initial run (CPI reported data).

The Title I grant administrator in collaboration with the Chief Human Resources Officer will review the source documentation. Reviews may include but are not limited to the following:

- Verify the percentage breakdown of split-funded staff based on their school assignments (schedule based on service minutes)
- Verify the percentage breakdown of program staff based on the percentage of students served by the home school (Gifted program, Alternative program). Program staff are pro-rated to the home school based on the number of students from each school they serve

- Review personnel sheets for each applicable school
- Review disability retirements
- Verify if any long-term substitutes have received their clearance certificate
- Review recommendation forms with dates of hire
- Verify reported percentages for part-time staff
- Review federally funded staff
- Review resignations, terminations, and retirements
- Verify student enrollment if any schools are new, closed, or rezoned
- Review contract abandonments Additionally, the following may be done:
- Teachers supporting hearing impaired students on a 1:1 ratio may be excluded from the report
- Special needs pre-K teachers paid from general funds may be excluded from the report

The source documentation will be compared to the counts on the comparability report. Source documentation may include schedules, student service models, recommendation forms, staff transfer forms, and payroll reports.

A comparability narrative will be completed for each error type found on the CPI data. Each error type will be discussed and a table of school changes by position (positive and negative) will be listed to show the effect on the comparability report.

Example - Gifted Center Teachers

An error was found with how 1 gifted teacher (Teacher Name) was reported on the October CPI report. The teacher was reported incorrectly (data entry error) for: 8% Berta Weathersbee Elementary, 34% Hillcrest Elementary, 28% Callaway Elementary, and 30% Hollis Hand Elementary. The teacher should have been reported for: 71% Clearview Elementary, 29% Franklin Forest Elementary, 0% Berta Weathersbee Elementary, 0% Hillcrest Elementary, 0% Callaway Elementary, and 0% Hollis Hand Elementary. This reflects the actual split based on student caseload. CPI has been updated for the March report to reflect the appropriate teacher proportions for each elementary school. *See attachment: Gifted Students.*

Gifted Teacher	**Reported**	**Actual**	**School Change**
Teacher Name	8% Berta Weathersbee Elementary	0% Berta Weathersbee Elementary	-.08
	34% Hillcrest Elementary	0% Hillcrest Elementary	-.34
	28% Callaway Elementary	0% Callaway Elementary	-.28
	30% Hollis Hand Elementary	0% Hollis Hand Elementary	-.30
	0% Clearview Elementary	71% Clearview Elementary	+.71
	0% Franklin Forest Elementary	29% Franklin Forest Elementary	+.29

Additionally, if errors are not found or errors do not make all of the schools comparable, the Chief Human Resources Officer and the Chief Financial Officer will determine if staff will be moved between schools or if additional staff will be added to schools where needed. This information must be added to the grant narrative.

Source documentation for the errors, staff transfers, and/or hires must be kept. Documentation will be kept on file by the Title I, Part A grant administrator.

A comparability chart will also be completed to show the total changes by school. The chart will include the school name, total number of pupils enrolled, the CPI report number of instructional staff, the revised number of instructional staff (corrected number), the pupils per teacher, and the change notes for each school. See the example below:

Elementary School Name	**Total Number of Pupils Enrolled**	**CPI Report: Number of Instructional Staff**	**Corrected Number: Revised Number of Instructional Staff**	**Pupils Per Teacher**	**Change Notes**
Rosemont Elementary School	387	33.3	**32.3**	12.0	Minus 1.0 SLP (SLP Name)
Berta Weathersbee Elementary School	424	34.4	**33.32**	12.7	Minus .08 Gifted Error (Teacher Name), Minus 1.0 SLP (SLP Name)
Callaway Elementary School	334	28.3	**27.52**	12.1	Minus .28 Gifted Error (Teacher Name), Minus .50 SLP (SLP Name)
Long Cane Elementary School	598	46.3	**45.1**	13.3	Minus 1.0 SLP (SLP Name), Minus .20 VI/SLP Supervisor (SLP Name)

The Comparability Calculation – All Title workbook must also be completed. The worksheet is located at www.gadoe.org under Federal Programs > Title I, Part A > Other Resources on the GaDOE website.

- Enter each school's name and grade span
- Pull the October FTE count for the previous year. K-12 enrollment will be used for the student enrollment column
    - The FTE count can be found at www.gadoe.org > Data & Reporting > Data Reports – Student Enrollment by Grade
    - Select the previous October report and Troup County
- Enter the corrected number of FTE Instructional Staff (to account for any errors, transfers, or hires)
    - Only staff members on the "Who to Count" table above should be included
    - Only count the percent of time that staff work at a site (split-funded percentage or part-time staff)
- Have the superintendent sign and date the summary page

The comparability narrative, comparability chart, source documentation, and Comparability Calculation – All Title worksheet are then sent to the Title I Area Specialist via email by the Title I, Part A grant administrator. Additionally, the source documentation is uploaded to the attachments tab in the Title I Comparability Application.

The Title I Area Specialist reviews the source documentation. If needed, the Title I Area Specialist will request changes or additional information. Once documentation is provided to support the requested changes and approved by the specialist, the data entries will be adjusted in the "self-reported" section of the application by the Title I Area Specialist and the comparability calculations will be re-run. This process is repeated until comparability is met. Once comparable, the Title I grant administrator and superintendent submit the Title I Comparability Application in the My GaDOE Portal.

If comparability is still not met through this process, the district will utilize their Resource Allocation Methodology/Plan (RAM/P) to demonstrate that all of their schools were equitably funded with state and local funding in order to show comparability.

Procedures for Meeting Comparability through the Resource Allocation Methodology/Plan (RAM/P)

If the district is unable to meet comparability through the previous methods, then the district may use the RAM/P to meet the comparability requirement. The RAM/P is a districtwide resource allocation plan based on student characteristics such as poverty, limited English proficiency, and disability. The RAM/P will demonstrate that the district uses state and local funds to provide comparable services to all schools (allocation of state and local funds on an equitable basis). The RAM/P must be officially approved by the GaDOE Title I, Part A Program Division.

The Title I, Part A grant administrator and the Chief Financial Officer and/or designee must maintain documentation demonstrating that the district has fully and correctly implemented the approved RAM/P in order to establish comparability. Source documentation will include payroll records, detailed school expenditure reports, school-based budgets, and SPLOST allocations (if applicable).

Comparability Timeline

- February: The Chief Human Resources Officer or designee use a spreadsheet to check comparability prior to sharing allotments with schools as well as when new positions are added. This helps ensure comparability prior to the required run by GaDOE.
- October/November: The district should check comparability (trial run) based on the October FTE count day and CPI reports. Hires or staff transfers may be made at this time.
- November 1st: The Title I, Part A grant administrator will run the Title I Comparability Report in the My GaDOE Portal based on the release by the GaDOE.
    - The release date may be extended by GaDOE and will be communicated via email.
    - If comparability is not met, prior to the comparability deadline, the Title I, Part A grant administrator, Chief Human Resources Officer, and Chief Financial Officer will:
        - Review the source documentation for errors

        - Develop the comparability narrative
        - Develop the comparability chart
        - Hire or transfer staff (if applicable)
        - Gather supporting documentation for the errors, hires, and/or transfers
        - Complete the Comparability Calculation – All Title worksheet
- November 15th: Deadline for the district to submit the online comparability report.
    - This date may be extended by the GaDOE based on the release of the application.
- December 31st: The system must meet comparability by December 31st by one of the approved methods.
    - This date may be extended by the GaDOE based on the release of the application.
    - Hires and transfers must be in place by the established deadline for meeting comparability (if applicable) or documentation that efforts have been made to fill open positions will be maintained.

ASSESSMENT SECURITY AND REPORTING OF ACCOUNTABILITY (ESSA Sec. 1111)

The Troup County School System (TCSS) is responsible for ensuring and maximizing the quality, objectivity, utility, and integrity of assessment and accountability information disseminated. The Director of School Improvement and Assessment is responsible for monitoring and improving the ongoing data quality of its assessment system.

Communication to Local Educators

The TCSS communicates the test security policy/plan and consequences for violation to local educators in the following ways:

- Trainings provided by the Director of School Improvement and Assessment
- Code of Ethics Training

Testing Administration

The TCSS shall implement and maintain a district-wide testing program that incorporates standardized assessments required by the Georgia Department of Education, state or federal law, and any other assessments required by the district to assist teachers and administrators in providing appropriate instruction for students.

Purpose:

Testing should fulfill the following purposes:

1. To identify each school's instructional strengths and weaknesses;
2. To serve as one source for the evaluation of the educational program;
3. To facilitate the planning of appropriate curriculum and instructional programs;
4. To facilitate in the selection of classroom instructional strategies;
5. To identify the level of achievement of district students as compared with that of other school districts locally and statewide;
6. To inform parents and the general public of the achievement of Troup County students.

Testing Training Plan:

I. Materials:
   a) All school testing coordinators must have a sign-in sheet for documentation of teacher and proctor participation.
   b) A GaDOE update on each test being administered will be provided as a reference/resource for school testing coordinators.
   c) A district update is provided to school testing coordinators to indicate any special requirements from the district.
   d) School coordinator's manuals and examiner's manuals are available. These manuals are used to assist in training. All manuals must be kept secure and accounted for after each use.
   e) School coordinators should distribute the roles/responsibilities for all individuals being trained: coordinator, principals, examiners, and proctors. Coordinator's discuss each group's roles/responsibilities, and have individuals sign at bottom. (This document can be found in the Student Assessment Handbook from the GaDOE)

II. Topics:
   a) Checking in materials at the district office is the responsibility of the School Improvement and Assessment Director's staff. They use the packing slip from each school's shipment to check the accuracy of the delivery. Checks are made of confirmations and notations of inaccuracies. The school testing coordinators report to the district office to check in with the School Improvement and Assessment Director's staff. They then sign, date, and copy the packing slip. A copy is kept in the School Improvement and Assessment Director's office (706-812-7900).
   b) In order to maintain the integrity of the assessment program and its results, security must be established and maintained. The responsibility of the assessment program at the school level rests with the principal and his/her designated school test coordinator.
      1. Use the Student Assessment in Georgia Schools (PSC document) to discuss the testing ethics and consequences of violations.
      2. Use the Examiner "Must Do" page from the GaDOE's Student Assessment Handbook.
      3. School Coordinators are trained in using the Troup County School System Incident Sheet, Access Log for Secured Test Storage Area, and Transcribing or Scribing Answer Document Form.
   c) School Coordinators are responsible for ensuring proper coding of test documents.
   d) School Coordinators are responsible for checking the accuracy of student information.
   e) School Coordinators are required to have test examiners sign materials in and out each day during test administration.
   f) Proctors are used when required. All test proctors are trained on their roles/responsibilities.
   g) Testing Procedures are clearly articulated to ensure a smooth and problem-free test administration. Schedules, groups and location assignments, and special directions are distributed and explained before testing administration.
   h) Accommodations are well documented for students with disabilities, English learners and students served under Section 504 of the Rehabilitation Act of 1973. School coordinators carefully check to ensure students are provided the appropriate and accurate accommodations for each individual test.

III. Collection of Materials
   a) Sign-in and sign-out sheets are used to document who is responsible for testing materials.
   b) Before testing documents are returned to district office, the school coordinator carefully accounts for all materials.
   c) During the document count, the school coordinator checks for complete information.

d) Materials are returned to the District Office, where the materials are re-counted by the System Director of Assessment and Accountability and assistant.
e) Principal Certification Sheets are required on all standardized tests. This document must be returned at the time of delivery of the testing materials and is maintained for five years, per GaDOE guidelines.

District/School State Report Card (ESSA Sec. 1111(h)(2))

The TCSS must widely disseminate to the public an annual district report card for the district as a whole and each school served by the district. The Governor's Office of Student Achievement (GOSA) provides each district a link to their system and each of their schools' report cards.

Under the Every Student Succeeds Act, the information must be accessible to the public. The placement of the report card must be in an easily accessible location for parents and stakeholders and should not require more than two clicks.

The TCSS places the report card link on the main district webpage and each school's main website on the top bar of the website. The link is listed as "GOSA Link to Report Cards" and is located next to the search box.

English Learner (EL) ACCESS Participation Rate

The TCSS Title III, Part A grant administrator will be responsible for checking the ACCESS participation rate of English Learners and collecting the justification reasons if the percentage falls below 95%.

INTERNAL CONTROLS

ALLOWABILITY (2 CFR Sec. 200.302(b)(7))

Grant administrators have responsibility for their respective grant budgets to ensure the efficient and effective administration of the federal award through the application of sound management practices. Grant administrators determine allowability in accordance with Subpart E – Cost principles and the terms and conditions of the federal award.

Grant Development

District and school needs and action steps are identified during the development of the Comprehensive LEA Improvement Plan (CLIP), School Comprehensive Needs Assessment (CNA), Continuous System Improvement Plan (CSIP) and School Improvement Plan (SIP). Grant administrators develop the district grant initiatives (action steps) based on the identified needs.

Budget Development

In coordination with development of the action steps, the district and schools assign the needed resources to support the supplemental action steps based on program allowability. Funds are coordinated to meet the goals and needs of the LEA identified through the CLIP and SIP

development process. Grant administrators ensure adherence to all regulations and guidance.

The grant administrators and administrative assistants review the school budgets to ensure that the budgeted line items are allowable, reasonable, and allocable. Additionally, the grant administrators and administrative assistants check the budgets for alignment with the SIP.

During the budget development process, grant administrators also complete supporting program documentation as well as account for the expense of all funds during the year in which the funds are allocated.

When creating the budget, each grant administrator follows the Georgia Local Units of Administration (LUA) chart of accounts. Function and object code combinations are determined by the objectives and allowable activities of the program.

Each grant administrator is responsible for submitting his/her budget to GaDOE by the established deadline.

Grant and Budget Development Timeline

The general timeline for review/revision of the CSIP, CLIP, School Improvement/Schoolwide Plan and supporting budgets is as follows:

July-September

- Receive Summative Data
  - Official Georgia Milestones Reports
  - Georgia Health Survey Reports
  - Graduation Rate
- Gathering Formative Data
  - Examples:
    - Attendance
    - Discipline
    - Reading Inventory
    - 9th Grade Failure Rate

October-December

- Quarter One CSIP Data Review
  - Review Formative Data
  - Focus on Subgroup Data/Gaps
- Receive College and Career Ready Performance Index
  - Climate Star Rating (if available)
  - Growth Information
  - Subgroup Closing the Gap

January

- Quarter Two CSIP Data Review
  - Review Formative Data
  - Focus on Subgroup Data/Gaps
  - Determine Professional Learning Needs
  - Add Action Steps
  - Revise Targets

February

- GaDOE CLIP Webinar(s)
- Bring CSIP to Board for Approval (for next school year)
- Both System and Schools Continue Collecting Data
- Stakeholder Meeting – Comprehensive Needs Assessment

March

- Quarter Three CSIP Data Review
    - Review Formative Data
    - Focus on Subgroup Data/Gaps
- Departments write action plans
- Budget process begins
- Schools begin writing SIP for next school year
    - Technical assistance provided as needed

April

- Posting of documents and feedback forms for stakeholder input on the District website
- Stakeholder meetings to provide input on the District Parent and Family Engagement Policy (District Improvement Forum)
- Stakeholder Meeting to provide input on the CNA/CSIP/CLIP (Internal and External)

May

- Quarter Four CSIP (End of Year) Data Review
- Focus on subgroup data/gaps
- Revisions Equity Plan and Required Questions due from grant administrators
- Stakeholder meetings to provide input on the CNA/CSIP/CLIP (Internal and External)
- Final revision of District Parent and Family Engagement Policy
- Meeting with DFCS to discuss the Foster Care Transportation Plan
- Coordination with transportation on the Foster Care Transportation Plan

June

- Additional stakeholder meetings (as needed) (Internal and External)
- Final revision of the Foster Care Transportation Plan
- Review of CLIP by System Directors and Cabinet
- Submission of CLIP by GaDOE deadline

July

- All School Improvement Plans are in place

Funds are made available for federal grants on a reimbursement basis. Requisitions for funds are processed by the Chief Financial Officer or designee after approval by the grant administrator.

Grant Drawdown Process:

- Grant drawdowns will be done each month to reimburse grant expenses incurred during the month the drawdown is requested.
- These drawdowns will occur once funds are made available in the GAORS system. Until funds are available, the Troup County School System will forward the funds for the grants to be reimbursed at a later date.
- The Chief Financial Officer or designee will use the accounting software to submit to the appropriate federal grant administrator the detail and total of the month's expenses in the grant along with a Federal Programs Fund Request to obtain signed approval to make the drawdown. Authorization approval for drawdowns is as follows:
    - IDEA – Exceptional Education – Executive Director of Exceptional Education & Support Services
    - GNETS – Director of GNETS
    - Title I, Part A – Director of Federal Programs
    - Schoolwide – Director of Federal Programs
    - School Improvement 1003(a) – Director of Federal Programs
    - Title II, Part A – Director of Federal Programs
    - Title III, Part A – Executive Director of Exceptional Education & Support Services
    - Title IV, Part A – Director of Federal Programs
    - Title V, Part B – Director of Federal Programs
    - Title IX, Part A – Director of Federal Programs

- Upon approval, the drawdown will be submitted into the GAORS system by the Finance Department.
- Schoolwide, Title I, Part A expenses will be reimbursed based on actual expenses charged to the funds' respective fund codes once a budget is approved by GaDOE and appropriate percentages are obtained. Drawdowns will take place after GaDOE budget approval.
- If software or account coding errors are found and require a reclassification, the appropriate journal entry will be reflected in the latest month with the effect captured in the subsequent drawdown.
- In the event of a personnel reclassification that goes back to prior month payroll checks, the total difference in expense will be subtracted or added to the latest month's drawdown and a notation will be made in a drawdown file detailing the reason.

Review of Expenditures to Determine Allowability

Grant administrators review all expenditures for pre-approval to ensure allowability to include:

- Contracts
- Purchase Orders
- Stipends
- Travel
- Extended Learning/Summer School Program Time Sheets
- Approval of Professional Leave (Substitutes)
- Completing Time Sheets for Family Liaisons, Tutors

<u>Completing the Individual Time Sheet</u>:

Troup County Schools will begin implementation and utilization of TimeClock Plus effective July 1, 2025. This vendor provides the services necessary to operate the time and attendance system that is vital to improving payroll processes and eliminating the need for paper timesheets across the system. These services ensure effective operation of the time and attendance system.

- Timeline:
  - Individual time sheets must be submitted to the grant administrator based on payroll cut-off dates
- Forms:
  - The most current form published by the grant department must be used.
  - Individual time sheets must be completed in ink, not pencil.
  - Entries must be legible and neatly written.
  - Individual time sheets cannot contain any white out.
  - Scratch outs are not allowable.
  - Small corrections may be made on the individual time sheet with one neat strike through and a legible correction. All corrections must be initialed and will be reviewed for acceptability.
- Heading:
  - The legal employee name as reflected on payroll documents should be entered. If nicknames or partial names are used, the Finance Department may have difficulty locating the employee in the financial management system.
  - The school name should be listed.
  - The normal contract day hours (beginning and ending time) should be entered.
- Days, Dates, Start/End Times, and Totals:
  - The dates of work should be entered.
  - The start and end time for each day of work listed should be entered.
  - The total hours for each day of work should be entered.
- Total Hours Worked and Signatures:
  - The total hours worked for all days listed should be calculated and entered in the Total Hours Worked block.
  - The employee must sign and date the completed time sheet in BLUE/BLACK ink.
  - The principal must sign and date the completed time sheet in BLUE/BLACK ink. The principal must sign and date the form the same date or after the employee signs the time sheet.
  - All dates beside signatures must be on or after the last day of work listed on the individual time sheet.

<u>Payment for Work in the Extended Learning/Summer School Program:</u>

- Hourly rates for positions are as follows:
  - Teachers – based on state salary hourly rate
  - Teacher substitutes - based on state salary hourly rate
  - Paraprofessional – based on state salary hourly rate

Professional Learning Leave Procedures:

- All professional learning forms are sent to the Office of the Assistant Superintendent of Curriculum, Instruction and Professional Learning
- Forms are sent to the appropriate funding source department for approval

Approval of Fund Requests Based on Identified Needs: Grant administrators review fund requests to ensure that the program objectives/purpose and terms and conditions of the federal award are met. Each grant administrator ensures that the request reflects an identified need in the Continuous System Improvement Plan (CSIP), Comprehensive LEA Improvement Plan (CLIP) and/or School Improvement Plan (SIP). Allowable activities are approved by the grant administrator. Activities that are not listed in the CSIP, CLIP or SIP are not allowable and are therefore, not approved.

Supplement not Supplant: District federal programs expenditures are supplemental to those provided to schools from state and local funds. Federal funds are only used to supplement and, to the extent practical, increase the level of funds that would, in the absence of federal funds, be made available from non-federal sources for the education of students participating in the federal programs. The grant administrators ensure that supplemental services are provided by reviewing all expenditures for pre-approval.

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

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

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

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

OR

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

Other Programs:

- Title I, Part C: Funds provided under this part shall be used to address the needs of migratory children that are not addressed by services available from other federal or non-federal programs, except that migratory children who are eligible to receive services under part A may receive those services through funds provided under that part, or through funds under this part that remain after the agency addresses the needs.
- Title II, Part A: Funds made available under this title shall be used to supplement, and not supplant, non-Federal funds that would otherwise be used for activities authorized under this title.
    - Funds may be used only to supplement educational program activities provided with state and local funds.
    - The TCSS may not use Title II, Part A funds to pay for activities that, in the absence of these funds, would be provided with state and local funds.
    - Title II, Part A funds may be used to fund only the professional development activities that supplement those mandated locally or by the state, and can supplement those discretionary professional development activities that TCSS would fund in the absence of other local and/or state funding sources.
    - The Director of Federal Programs will consider the following questions when determining whether or not an expenditure would create a presumption of supplanting:
        - Is the program or activity that the LEA wants to fund required under state, local, or another federal law? If it is, then it is supplanting.
        - Were state or local funds used in the past year to pay for the program or activity? If they were, it is supplanting.

    The presumptions may be rebutted if TCSS demonstrates that it would not have provided the services in question with non-federal funds had the federal funds not been available.
- Title III, Part A: Funds made available under this subpart shall be used to supplement the level of federal, state, and local public funds that, in the absence of such availability, would have been expended for programs for English learners and immigrant children and youth and in no case to supplant such federal, state, and local public funds.
- Title IV, Part A: Funds made available under this subpart shall be used to supplement, and not supplant, non-federal funds that would otherwise be used for activities authorized under this subpart.
- Title V, Part B: Funds made available under this subpart shall be used to supplement, and not supplant, non-federal funds that would otherwise be used for activities authorized under this subpart.
- Title IX, Part A: Funds made available under this subpart shall be used to supplement, and not supplant, non-federal funds that would otherwise be used for activities authorized under this subpart.
- IDEA: Funds must be used to supplement state, local, and other federal funds and not to supplant those funds.

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

- Were required to be made available under other federal, state, or local laws.
- Were provided with non-federal funds in prior years.

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

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

- Fiscal documentation to confirm that, in the absence of Title I, Part A, the TCSS would have eliminated the services in question.
- Programmatic documentation to confirm that, in the absence of Title I, Part A, the TCSS would have eliminated the services in question.
- State or local legislative action.

Aligns to Cost Principle Allowability: Each grant administrator will review all fund requests for pre-approval. The grant administrator will also maintain documentation to support the costs charged to each federal award. The grant administrator will ensure the following:

- That fund requests are **necessary and reasonable** for the performance of the federal award.
    - The cost will be considered reasonable if it
        - Does not exceed an amount that a prudent person under the circumstances would incur at the same time
        - Is considered ordinary and necessary for the operation and effectiveness of the federal award
        - Is comparable to market prices for the geographic area
        - Follows sound business practices
        - Is between two parties that are independent
- That the funds conform to any limitations of exclusions set forth in the 2 CFR Sec. 200 as to types or amounts of costs.
- That the funds are consistent with policies and procedures.
- That the funds are in accordance with generally accepted accounting procedures.
- That the funds are **allocable** to the federal program (law and non-regulatory guidance).
    - The cost will be considered allocable if
        - Goods or services involved are chargeable to the federal award.
        - It is necessary for the overall operation of the federal award.
    - The grant administrator will charge proportional costs to the appropriate grant award if applicable.
- That the funds **adhere to the period of performance.**
    - Each grant administrator will ensure that new obligations incurred to carry out the work authorized by the federal grant are during the time frame which the grant may incur new charges.
    - The period of performance will be July – June (12 months) with an interim time frame of July – September (additional 3 months).
- That the funds **avoid conflict of interest**.
- That the funds are adequately documented through the collection of artifacts (agendas, sign-in sheets, handouts, forms).
- That the funds are subject to allowability described in the **General Provisions for Selected Items of Cost (2 CFR Part 200.420-200.475)** which covers the following:

- Advertising and Public Relations – Allowable costs include:
  - Costs specifically required by the federal award;
  - Costs of communicating with the public and press pertaining to specific activities or accomplishments which result from performance of the federal award (these costs are considered necessary as part of the outreach effort for the federal award); or
  - Costs of conducting general liaison with news media and government public relations officers, to the extent that such activities are limited to communication and liaison necessary to keep the public informed on matters of public concern, such as notices of funding opportunities, financial matters, etc.
- Advisory Councils – Unallowable unless authorized by statute.
- Alcoholic Beverages – Unallowable.
- Alumni Activities – Unallowable.
- Audit Services – Allowable costs include:
  - A reasonably proportionate share of the costs of audits required by, and performed in accordance with, the Single Audit Act Amendments of 1996.
- Bad Debts – Unallowable.
- Bonding Costs – Not implemented with current federal awards received.
- Collection of Improper Payments – Allowable costs include:
  - The costs incurred by a system to recover improper payments are allowable as either direct or indirect costs, as appropriate.
- Commencement and Convocation Costs – Unallowable.
- Compensation – Personal Services – Allowable costs include:
  - Compensation for personal services includes all remuneration, paid currently or accrued, for services of employees rendered during
    the period of performance under the federal award, including but not necessarily limited to wages and salaries.
  - The total compensation must be reasonable for the services rendered and conform to the established written policy of the system (applied consistently for federal and non-federal initiatives).
- Compensation – Fringe Benefits – Allowable costs include:
  - Fringe benefits include, but are not limited to, the costs of leave (vacation, family-related, sick, or military), employee insurance, pensions, and unemployment benefit plans.
  - The costs of fringe benefits are allowable provided that the benefits are reasonable and are required by law, system-employee agreement, or an established policy of the system.
  - The cost of fringe benefits must be covered under written policies.
- Conferences – Allowable costs include:
  - A conference is defined as a meeting, retreat, seminar, symposium, workshop, or event whose primary purpose is the dissemination of technical information beyond the system and is necessary and reasonable for successful performance under the federal award.
  - Allowable conference costs paid by the system may include rental

of facilities, speakers' fees, costs of meals and refreshments, local transportation, and other items incidental to such conferences unless further restricted by the terms and conditions of the federal award.
    - Each grant administrator will ensure that conference costs are appropriate, necessary, and managed in a manner that minimizes costs to the federal award.
- Contingency Provisions – Not implemented with current federal awards received.
- Contributions and Donations – Unallowable.
- Defense and Prosecution – Unallowable.
- Depreciation – Allowable costs include:
    - Computations based on the acquisition cost of the asset.
    - Establishment of useful life.
    - Methods for calculation must reflect the pattern of consumption during its useful life.
- Employee Health and Welfare Costs – Allowable costs include:
    - Costs incurred in accordance with the system's documented policies for the improvement of working conditions, employer-employee relations, employee health, and employee performance.
- Entertainment Costs – Unallowable.
- Equipment and Capital Expenditures – Allowable costs include:
    - Capital expenditures approved in writing by the Georgia Department of Education.
    - Each grant administrator will maintain documentation indicating approval of capital expenditures.
- Exchange Rate – Not implemented with current federal awards received.
- Fines, Penalties, Damages, or Other Settlements – Unallowable.
- Fundraising and Investment Management Costs – Unallowable.
- Gains and Losses on Disposition of Depreciable Assets – Allowable costs include:
    - Gains of losses from the disposition of depreciable property must be included in the year which they occur.
- General Costs of Government – Unallowable.
- Goods or Services for Personal Use – Unallowable.
- Idle Facilities and Idle Capacity – Not implemented with current federal awards received.
- Insurance and Indemnification – Allowable costs include:
    - Costs of insurance required or approved and maintained pursuant to the federal award, sound business practices, and the district's policies.
- Intellectual property – Not implemented with current federal awards received.
- Interest – Unallowable.
- Lobbying – Unallowable.
- Losses on Other Awards or Contracts – Unallowable.
- Maintenance and Repair Costs – Allowable costs include:
    - Costs incurred for necessary maintenance, repair, or upkeep of equipment which does not add to the permanent value of the

property and keeps it in an efficient operating condition.

- Materials and Supplies Costs, Including Costs of Computing Devices – Allowable costs include:
  - Costs incurred for materials and supplies to carry out a federal award.
- Memberships, Subscriptions, and Professional Activity Costs – Allowable costs include:
  - Costs of the system's membership in business, technical, and professional organizations if approved by the awarding agency and allowable under the federal award.
  - Costs of the system's subscriptions to business, professional, and technical periodicals if approved by the awarding agency and allowable under the federal award.
- Organization Costs – Unallowable.
- Participant Support Costs – Allowable costs include:
  - Stipends or subsistence allowances, travel allowances, and registration fees paid to or on behalf of participants or trainees (excluding employees) in connection with conferences or training projects with prior approval.
- Plant and Security Costs – Allowable costs include:
  - Necessary and reasonable expenses incurred for protection and security of facilities, personnel, and work products.
- Pre-award Costs – Not implemented with current federal awards received.
- Professional Service Costs – Allowable costs include:
  - Costs of professional and consultant services rendered by persons who are members of a particular profession or possess a special skill.
- Proposal Costs – Not implemented with current federal awards received.
- Publication and Printing Costs – Allowable costs include:
  - Publication costs for electronic and print media, including distribution, promotion, and general handling are allowable.
- Rearrangement and Reconversion Costs – Not implemented with current federal awards received.
- Recruiting Costs – Allowable costs include:
  - Travel costs of employees while engaged in recruiting personnel are allowable to the extent that such costs are incurred pursuant to the district's standard recruitment program.
- Relocation Costs of Employees – Not implemented with current federal awards.
- Rental Costs of Real Property and Equipment – Allowable costs include:
  - Rental costs for reasonable rates (comparable property, market conditions, alternatives available).
- Scholarships and Student Aid Costs – Not implemented with current federal awards.
- Selling and Marketing Costs – Unallowable.
- Specialized Service Facilities – Not implemented with current federal awards.
- Student Activity Costs – Unallowable.
- Taxes (Including Value Added Tax) – Allowable costs include:
  - Taxes that the governmental unit is legally required to pay.

- Termination Costs – Not implemented with current federal awards received.
- Training and Education Costs – Allowable costs include:
  - Training and education for employee development.
- Transportation Costs – Allowable costs include:
  - Costs incurred for freight, express, cartage, postage, and other transportation services relating either to goods purchased, in process, or delivered, are allowable.
- Travel Costs – Allowable costs include:
  - Travel costs are the expenses for transportation, lodging, subsistence, and related items incurred by employees who are in travel status on official business.
  - Travel is charged based on an actual cost basis up to the per diem amount.
  - Lodging and subsistence costs must be reasonable and allowable.
  - Lodging should be booked at the per diem rate – if not, documentation will be retained to justify additional expense.
  - Participation must be necessary to the federal award.
  - Airfare costs must be the least expensive unrestricted accommodations class offered by the commercial airlines.
- Trustees – Not implemented with current federal awards received.

Resource Allocation Methodology/Plan (RAM/P) Development

The RAM/P is developed by the Chief Financial Officer and/or designee in coordination with the Director of Federal Programs. The RAM/P details how the district equitably distributes state and local funds and resources to each of its schools before allocating funds. The district must provide funds to Title I schools on the same basis as it provides funds to non-Title I schools, subject to application of the "exclusion" provision. This includes funds needed to provide services that are required by law.

The district includes in the RAM/P

- Personnel Staffing Allocations
  - Instructional Personnel Allocations
    - An instructional allocation ratio per full-time equivalent (FTE) plus an economically disadvantaged factor is used for each grade band
    - Exceptional education teacher allotments are based on maximum class sizes (Students with Disabilities of State Board Rule 160-5-1-.08 Class Size and State Board Rule 160-4-7-.14 Personnel, Facilities and Caseloads)
    - ESOL teacher allotments are based on maximum class sizes (English to Speakers of Other Languages (ESOL) of State Board Rule 160-5-1-
      .08 Class Size)
    - Instructional paraprofessionals are based on an allocation ratio for each grade band
    - The three lowest scoring elementary schools receive .5 points in the formula and an additional paraprofessional or equivalent
    - The two lowest scoring middle schools receive an additional teacher

or equivalent
        - The lowest scoring high school receives an additional teacher or equivalent
    - Other Staff Allocations
        - School administration is based on an allocation ratio for each grade band
        - Other support personnel are based on an allocation ratio for each grade band
        - Program staff is based on an allocation ratio by program
- School-based Operating Allocations
    - Flat allocations are provided per FTE for basis operations
- SPLOST Operation Allocations
    - Technology devices are based on student enrollment ratios for each grade band

Timeline:

- May/June
    - Creation of RAM/P Plan
- July
    - Submission of RAM/P Plan to GaDOE
- October
    - FTE Count
- November
    - Final revision of RAM/P Plan based on October FTE Count
    - Submission of final RAM/P Plan to GaDOE

SEGREGATION OF DUTIES (GAO-14-704G)

Segregation of duties helps prevent fraud, waste, and abuse in the internal control system. The district considers the need to separate control activities related to authority, custody, and accounting of operations to achieve adequate segregation of duties. Segregation of duties can address the risk of management override. Management override circumvents existing control activities and increases fraud risk. The district addresses this risk through segregation of duties.

In an effort to ensure fidelity among all federal programs, the Troup County School System employs grant administrators and support staff to oversee the operations of all federal programs. The grant administrators have direct authority and responsibility in regards to the budget and expenses of the grant.

It is the responsibility of the respective grant administrator to notify the Chief Financial Officer and/or designee when an issue or discrepancy arises concerning purchase orders, payments, payroll, and/or journal entries to reduce and prevent errors, waste, and fraud. Unless stipulated otherwise by the federal award, the grant is governed by the policies and procedures adhered to by the Troup County School System.

The grant administrator and the Finance Department are responsible for ensuring that the financial system accurately reflects the activities associated with the grant.

The following are responsibilities of the grant administrator:

- Notify finance when the budget has been approved or amended
- Monitor the budget and initiate budget transfers
- Make amendments and transfers in the financial system
- Verify accurate account numbers and availability of funding for payments
- Communicate with Human Resources (HR)/Finance any changes as to who should be paid or removed from the grant
- Respect and protect the confidentiality of information that is personally identifiable

The following are responsibilities of the Finance Department:

- Establish the budget in the financial system
- Provide financial reports for review to assist in capturing and reducing errors
- Authorize and withdraw access to accounts
- Make corrections to financial records when discrepancies are discovered
- Provide financial reports for review to internal and external stakeholders
- Respect and protect the confidentiality of information that is personally identifiable

The Troup County School System follows processes for segregation of duties including:

Segregation of Duties for Purchasing

- Requisitions will be approved at the school or department-level by the appropriate administrator authorized to make purchasing decisions prior to being purchased.
- The grant administrator will review the requisitions for appropriateness and for proper account use. Once determined appropriate, the requisition will be approved and will be forwarded to the Finance Department for final approval. After approval, the purchase order will be sent to the requestor for purchase.

    - IDEA – Exceptional Education – Executive Director of Exceptional Education & Support Services
    - GNETS – Director of GNETS
    - Title I, Part A – Director of Federal Programs
    - Title II, Part A – Director of Federal Programs
    - Title III, Part A –Executive Director of Exceptional Education & Support Services
    - Title IV, Part A – Director of Federal Programs
    - Title V, Part B – Director of Federal Programs
    - Title IX, Part A – Director of Federal Programs

- After the purchase has been made and all items received, the purchase order is marked as received by the purchase order creator (school bookkeeper, grant administrator or designee) in Munis once items are verified. The invoice will be sent to the Finance Department where the accounts payable clerk will make payment.

PROCUREMENT PROCEDURES (2 CFR Sec. 200.319(c))

The Troup County School System implements procurement procedures that include a clear and accurate description of the technical requirements of the material, product or service being procured.

Approval Process for Grant Funds

Approval by grant administrators is required before orders can be placed. The purpose of this additional level of approval is to make sure the purchase request matches the approved federal budget and is deemed an allowable expense. Grant administrators can place additional requirements for purchase authorization as needed. The current list of grant administrators follows:

Grant	Grant Administrator
IDEA - Exceptional Education	Director of Exceptional Education
GNETS	Director of GNETS
Title I, Part A	Director of Federal Programs
Schoolwide	Director of Federal Programs
Title I, Part A, School Improvement (a)	Coordinator of Elementary Education
Title II, Part A	Director of Federal Programs
Title III, Part A	Director of Student Services
Title IV, Part A	Director of Federal Programs
Title V, Part B	Director of Federal Programs
Title IX, Part A	Director of Federal Programs

Methods of Procurement with Federal Funds

In addition to local requirements, procurement with federal funds is based on one of four levels:

- Micro-Purchase ($0-$4,999)
- Small Purchase ($5,000-$250,000)
- Sealed Bids (>$250,000)
- Competitive Proposal (>$250,000)
- Sole Source

Procurement levels are periodically adjusted for inflation.

Micro-Purchase: A micro-purchase is an acquisition of products/supplies or services using simplified acquisition procedures where the aggregate amount does not exceed $4,999 (micro-purchase threshold). Micro-purchase procedures are a subset of the system's small purchase procedures. The TCSS uses micro-purchase procedures in order to expedite the completion of its lowest-dollar small purchase transactions and minimize the associated administrative burden and costs. Micro-purchases may be awarded without soliciting competitive quotes if the system considers the price to be reasonable. To the extent practicable, purchases must be distributed equitably among qualified suppliers with reasonable prices. The TCSS calculates the aggregate dollar amount for each purchase order of products/supplies or services.

Small Purchase: Small purchase procedures are those relatively simple and informal procurement methods for securing services, supplies, or other property that do not cost more than the simplified acquisition threshold. Under the small purchase procedures, price or rate quotes must be obtained from an adequate number of qualified sources (at least two).

Sealed Bids: Procurement by sealed bids (formal advertising) are when bids are publicly solicited and a firm fixed price contract (lump sum or unit price) is awarded to the responsible bidder whose bid, conforming with all the material terms and conditions of the invitation for bids, is the lowest in price. The following conditions must be present for sealed bids:

- A complete, adequate, and realistic specification or purchase description is available.
- Two or more responsible bidders are willing and able to compete effectively for the business.
- The procurement lends itself to a firm fixed price contract and the selection of the successful bidder can be made principally on the basis of price.

The following requirements apply for sealed bids:

- The invitation for bids will be publicly advertised and bids must be solicited from an adequate number of known suppliers, providing them sufficient response time prior to the date set for opening the bids. Invitations are placed on the Georgia Registry and the website.
- The invitation for bids, which will include any specifications and pertinent attachments, must define the items or services in order for the bidder to properly respond.
- All bids will be publicly opened at the time and place prescribed in the invitation for bids.
- A firm fixed price contract award will be made in writing to the lowest responsive and responsible bidder. Where specified in bidding documents, factors such as discounts, transportation cost, and life cycle costs must be considered in determining which bid is lowest. Payment discounts will only be used to determine the lowest bid when prior experience indicates that such discounts are usually taken advantage of.
- Any or all bids may be rejected if there is a sound documented reason.

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

For competitive proposals, the following requirements apply:

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

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

- The item is available only from a single source.
- The public exigency or emergency for the requirement will not permit a delay resulting from competitive solicitation.
- The federal awarding agency or pass-through entity expressly authorizes noncompetitive proposals in response to a written request from the system.
- After solicitation of a number of sources, competition is determined inadequate.
- Procurement by sole source should be limited.
- The aggregate dollar amount does not exceed the micro-purchase threshold.

2 CFR-FrequentlyAsked Questions 202150321.pdf (cfo.gov)

Requisition Process

Requisitions are "requests" made by schools or departments to reserve (encumber) funds for the purchase of specified goods or services. In essence, this initiates the purchasing process. Upon approval, requisitions are converted to purchase orders by the Finance Department which may then be issued to the appropriate vendor. All purchases made by a school or department must begin with a requisition.

Requisitions are entered by the school/department secretary after initial approval is given at the site level. Before entering a requisition, the following must be completed:

- Determine that the purchase is an allowable use of grant funds
- Obtain the initial approval at the site level
- Review the budget to verify that funds are available for the purchase
- Choose the correct vendor number for the order
- Choose the correct account code that describes what is being purchased

Requisitions should be addressed to the vendor of goods and services rather than be used to reimburse a site or employee for purchases made. Requests for reimbursement may be denied if the purchases were made in a non-emergency situation. In any case, sites and employees will not be reimbursed for any sales tax paid on purchases.

Common errors on requisitions include:

- Omission of Shipping, Handling and Freight Charges: Addition of shipping, handling, and freight costs to the issued total price on a purchase order often results in a price increase over 10% of the total. This results in a delay of orders due to the necessity to cancel and reissue the original purchase order.
- Wrong Account Number on Requisition: Accurate account numbers that describe the good or service being purchased should be used. An account number should not be used simply based on the fact that budgeted funds exist in the account code.
- Incomplete Product Information: Omission of catalog numbers, vague descriptions, incomplete descriptions, wrong descriptions, omission of size, color, or other specifications results in delays or rejection of orders from vendors.

GUIDELINES FOR PURCHASED PROFESSIONAL SERVICES CONTRACTS

Requirements for Purchased Professional Services Contracts for Federal Grants:

- Funds from the approved federal grant budget for the district or a school may be used to purchase professional services from allowable sources to increase teacher capacity, increase student academic achievement and promote parent engagement between the district, schools, and community.
- Purchased Professional Services Contracts must be approved by the applicable grant administrator, the Chief Financial Officer and/or designee, and the Superintendent and/or designee **prior** to the start of services.
    - Services started prior to approval of the Purchased Professional Services Contract by **all** approvers cannot be paid with federal funds.
- The grant administrator will determine if the purchased professional services are reasonable and necessary, allocable to the grant being used to fund the services, and allowable under federal compliance guidelines.
- Examples of allowable services that may be purchased using a Purchased Professional Services Contract are as follows:
    - Professional learning for teachers, school, and district staff delivered by a consultant or company.
        - Professional learning may be delivered through the following methods:

        - On-site
        - Live, interactive online streaming
        - Live or pre-recorded webinars
    - Services to increase student academic achievement.
        - Examples of these services may include:
            - Online or paper student assessments
    - Services to translate district and school Title I, Part A parent engagement information into another language.
        - District and school parent engagement documents that may be translated include:
            - Parent and family engagement policies
            - Newsletters
            - Parent compacts
            - Flyers and invitations for parent workshops or events
            - Handouts to be disseminated at parent workshops or events
            - Parent surveys to obtain feedback regarding parent engagement and parent workshops or events
    - Services to interpret Title I, Part A information presented at district or school parent engagement meetings and workshops for students and parents/guardians with language barriers who attend.
- All district and school purchases made through a Purchased Professional Services Contract must be listed as an identified need in the district/school Comprehensive Needs Assessment (CNA) or in action steps in the district/school Improvement Plan (IP) as applicable AND in the district/school school's grant budget.
- All district and school purchases made through a Purchased Professional Services Contract must adhere to the following federal purchasing guidelines:
    - Any purchase that totals $5,000 for single or multiple services must have a minimum of three quotes unless the vendor is a sole source vendor.
        - If a sole source vendor is used, a justification must be submitted detailing why the sole source vendor was selected.
        - A copy of the vendor's sole source letter must be submitted.
    - If the services being purchased on the Purchased Professional Services Contract are not from the vendor issuing the lowest quote, a written justification must be submitted detailing why the higher cost vendor was selected to meet identified needs. Examples of allowable reasons for selecting a higher cost vendor are listed below:
        - The selected vendor offers a broader range of topics for professional learning that correlate with teachers' instructional weaknesses that the other vendors do not.
        - The selected software program directly aligns and links to the district's assessment software program currently in use while the other software programs do not.

Payment of Purchased Professional Services Contracts:

- The grant administrator will request payment of the Purchased Professional Services Contract from the Finance Department after completion of services listed on the contract.
- Payment to the vendor will be made **only** after services are verified and required

documentation has been received, reviewed, and approved by the grant administrator.

- The following documentation must be submitted to the grant administrator as evidence of fulfillment of services for professional learning or consulting services:
  - Approved agenda for **each** day of service listed on the contract.
  - Complete sign-in sheets for **each** day of service and session listed on the contract.
    - Sign-in sheets must contain all requested information for each participant.
    - Separate sign-in sheets for each session must be created, signed by all participants, and submitted to the grant bookkeeper.
  - Copy of the presentation, talking points, and/or handouts.
    - Training materials must be consistent with the topics listed on the approved agenda and Purchased Professional Services Contract.
  - Invoice from the vendor for all dates of service to include the following information as listed on the Purchased Professional Services Contract:
    - Vendor name and address
    - Invoice date that is **on or after** the last date of service listed on the Purchased Professional Services Contract
    - Description of services
    - Total fee for services
- The following items must be submitted to the grant administrator as evidence of fulfillment of services for student assessment services:
  - Data file in a readable format containing student assessment results for all applicable grades as listed on the Purchased Professional Services Contract.
- Documentation providing evidence of contract fulfillment should be submitted to the grant administrator as soon as possible after the last date of service as listed on the Purchased Professional Services Contract to ensure timely payment of the contract.
- After approval of the documentation required as evidence of fulfillment of services listed on the Purchased Professional Services Contract, the grant administrator will authorize payment of the contract.
- Payment of Purchased Professional Services Contracts should be made within 30 days after completion of services.

Contract Oversight

The grant administrators will only authorize payment of federal funds to contractors that perform in accordance with the terms, conditions, and specifications of the contract. Payment will only be made after deliverables are received.

Statewide Contracts

To the extent that a need exists for purchasing contracted services or equipment with federal funds, the TCSS may utilize Georgia's statewide contracts for the procurement of services in the same capacity as state agencies and universities. The use of statewide contracts may benefit federal programs in that these contracts can, oftentimes, fill a need for specialized supplemental supports such as interpreting and translation services. In exercising this option for the procurement of services, the TCSS will follow the ordering instructions listed on the individual contract information sheets and the system's internal processes. Products on State Contract are

not required to be bid. The following should be adhered to:

- If utilizing a statewide contract for a federal purchase between $5,000 and $250,000, a statewide contract should suffice without additional quotes.
- If using a statewide sole source contract, the school/department should either attempt to get additional quotes or document that the provider is sole source for their individual needs.
- If utilizing a statewide contract for a purchase in excess of $250,000, the TCSS must ensure all federal requirements are met.
- If tutoring services are utilized during the day, contractors will perform in accordance with the terms, conditions, and specifications of the contract. If vendor payment exceeds $25,000, there will be a suspension and debarment check.

Period of Performance Flexibility

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

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

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

Record Maintenance (2 CFR Sec. 200.318(i))

Records that detail the procurement history are maintained by the Federal Programs Department/Finance Department for a period of five years. Records include:

- Method of procurement
- Contract type
- Selection or rejection of contractor
- Basis for the contract price

METHOD FOR CONDUCTING TECHNICAL EVALUATIONS OF COMPETITIVE PROPOSALS AND SELECTING RECIPIENTS (2 CFR Sec. 200.320(d)(3))

The Troup County School System (TCSS) implements procurement procedures that include a clear and accurate description of the technical requirements of the material, product, or service being procured.

Requests for Proposals (RFP)

A Request for Proposal (RFP) may be used to solicit offers for goods or services when there is a need for a competitive proposal process. Purchases with an estimated total cost of $50,000 or more may require formal competitive bids. Under no circumstances should purchases be split to avoid bid limits. Issuing RFPs to vendors and establishing a set of procedural standards for bidding ensures a fair and open process aimed at obtaining the lowest price and highest quality. Products under State Contract are not required to be bid.

RFP Creation

In order to create a RFP, several factors must be taken into consideration:

- Clarity of the RFP's specifications
- How the bids are going to be evaluated
- Amount of leeway vendors have in their bids
- Flexibility the system has to negotiate after submission

The Request for Proposal is an opportunity to state the level of a good or service that is required in order to obtain the system's business. Because of this, the document used must be clear in expressing this level through the use of detailed specifications that informs the vendor of the minimum required for a satisfactory transaction. Specifications should include:

- Good or service requested
- Dates by which the good or service must be received or completed
- Estimated quantity required during the course of the time period stated
- Quality of the good (i.e. specific brands if applicable)
- Date and time the bids must be received by
- Packaging of the bid (e.g. sealed envelope, electronic copy, etc.)

When constructing the RFP document, the layout should reflect how the bids will be evaluated once received. The format should be in a manner that provides an easy and clear method of computing the results. More importantly, the specifications should lend themselves to a consistent response by all bidders, leaving little opportunity for bidders to change or write-in specifications that would make the evaluation process more subjective. If alternatives are allowed within the specifications, this must be stated on the document along with the boundaries that these alternatives must fall under. For example, a different brand of a good is acceptable as long as other minimum requirements are met.

A deadline past which no other submissions will be accepted should be stipulated in the RFP. RFP specifications should be subject to change as necessary by the system. All RFPs should be submitted to the Finance Department for review.

RFP Process

The following must be included in the RFP process:

1. Adequate public notice of the RFP shall be given. Vendors need adequate time (14 to 30 days depending on products desired and complexity) to prepare and return an accurate proposal. Without fair notice, the list of participating vendors tends to decrease. When sealed bidding is required, the RFP will be mailed to all or a portion of prospective vendors on the system's bidder list.
2. RFPs will designate a date and time bids are publicly opened and read. Bids will not be received after the stated time and at no other location other than that which has been stated.
3. Sealed bids shall be identified as such by markings placed on the outside of the envelope.
4. The RFP shall state the relative importance of price and other evaluation factors.
5. Offerors will not contact staff of the system concerning an RFP during the term of the proposal solicitation and evaluation other than through the appropriate department as needed for clarification purposes.
6. No contact, inspections, or site visits with offerors will be made other than by the appropriate system department staff.
7. Teams made up of subject matter experts selected from within the system or other consultative entities will perform the evaluation of proposals. This responsibility is usually given to the department staff who requested the proposal. The department administrator should be in attendance when the sealed bids are opened.
8. An evaluation plan will be prepared prior to the start of evaluation, which allows for scoring of the proposals according to the evaluation factors and their weighted values.
9. Price will be included as part of the determination of best value.
10. A determination of a competitive range may be made after initial submission of proposals and after any additional revisions. Offerors not in the competitive range of being selected for award shall be eliminated from further consideration.
11. During the evaluation phase, discussions may be conducted with offerors who submitted proposals determined to be eligible for the award. These discussions are for the purpose of negotiations, clarification, and to assure full understanding of and responsiveness to the RFP requirements. Offerors will be accorded fair and equal treatment with respect to an opportunity for discussion and revision of proposals. The Chief Financial Officer (CFO) may permit revisions after submission and prior to award for the purpose of obtaining best and final offers. In conducting any such discussions, no disclosure will be made of any information derived from proposals submitted by competing offerors. In the event of a tie, the following is recommended:
    a. Between a supplier within the state of Georgia and an out-of-state vendor, preference should be given to the supplier within the state.
    b. Between two suppliers within the state of Georgia, one outside Troup County and the other within Troup County, preference should be given to the local vendor.
    c. Between two suppliers outside Troup County, preference should be given to the vendor who has the best track record of performance.
    d. Between two suppliers outside Troup County whose track records are similar, the vendor with the closest proximity to Troup County should be given preference.

12. After the bids are evaluated and approved, a purchase order or Notice of Award is issued to the lowest responsive bidder meeting specifications and requirements to invoke a contract between the parties.
13. The CFO is authorized to accept or reject, with justification, any or all bids or parts of bids. The CFO is also authorized to waive informalities, technicalities, irregularities, and administrative mistakes in bids. Non-emergency purchase contracts in the amount of $50,000 or more must be approved by the Board of Education. *The Board of Education has the right to reject or accept any bid.*
14. A register of proposals shall be prepared and made available for public inspection after award of the contract.
15. If a bidder is in disagreement with a decision of the CFO regarding the bid opening, he/she will have ten working days from the bid opening to present his/her appeal to the Superintendent. Failure to meet this time limit will void any appeal or protest.

TCSS Purchase Limits (Local)

Determining the best price of a good or service is very important when using system funds. The Finance Department encourages competitive purchasing at every level of expenditure. Quality is always an important factor influencing the decision to purchase between two or more products that are similarly priced. However, before a staff member makes a purchase, they should refer to the "Purchase Limit Table" below to see the number of bids/quotes as well the approval necessary to move forward in the purchasing process. Acceptable forms of obtaining a bid/quote are as follows:

- Catalogs
- Internet (printed from website)
- Verbal and written quotations by vendor
- In-store (prior to approval)
- Formal Request for Proposal (RFP)

Price Range	Number/Type of Bids/Quotes	Approval Level
$50,000 +	Competitive bids/quotes required. RFP procedure necessary when required by law or board policy.	Board of Education

Maintenance of Bid/Quote Records

All bid and quote information should be maintained by the school or department. The following details what should be maintained:

- Written bids for items between $10,000 and $49,999 - Bid/quote records should be submitted to the Finance Department upon request.
- Written bids in response to formal RFP - Bid records including the RFP should be submitted to the Finance Department upon request as well as the Board of Education to make approval decisions when necessary.

Methods of Procurement with Federal Funds

In addition to local requirements, procurement with federal funds is based on one of four levels:

- Micro-Purchase ($0-$10,000)
- Small Purchase ($10,000-$250,000)
- Sealed Bids (>$250,000)
- Competitive Proposal (>$250,000)
- Sole Source

Procurement levels are periodically adjusted for inflation.

Micro-Purchase: A micro-purchase is an acquisition of products/supplies or services using simplified acquisition procedures where the aggregate amount does not exceed $10,000 (micro-purchase threshold). Micro-purchase procedures are a subset of the system's small purchase procedures. TCSS uses micro-purchase procedures in order to expedite the completion of its lowest-dollar small purchase transactions and minimize the associated administrative burden and costs. Micro-purchases may be awarded without soliciting competitive quotes if the system considers the price to be reasonable. To the extent practicable, purchases must be distributed equitably among qualified suppliers with reasonable prices. TCSS calculates the aggregate dollar amount for each purchase order of products/supplies or services.

Small Purchase: Small purchase procedures are those relatively simple and informal procurement methods for securing services, supplies, or other property that do not cost more than the simplified acquisition threshold. Under the small purchase procedures, price or rate quotes must be obtained from an adequate number of qualified sources (at least two).

Sealed Bids: Procurement by sealed bids (formal advertising) are when bids are publicly solicited and a firm fixed price contract (lump sum or unit price) is awarded to the responsible bidder whose bid, conforming with all the material terms and conditions of the invitation for bids, is the lowest in price. The following conditions must be present for sealed bids:

- A complete, adequate, and realistic specification or purchase description is available.
- Two or more responsible bidders are willing and able to compete effectively for the business.
- The procurement lends itself to a firm fixed price contract and the selection of the successful bidder can be made principally on the basis of price.

The following requirements apply for sealed bids:

- The invitation for bids will be publicly advertised and bids must be solicited from an adequate number of known suppliers, providing them sufficient response time prior to the date set for opening the bids. Invitations are placed on the Georgia Registry and the website.
- The invitation for bids, which will include any specifications and pertinent attachments, must define the items or services in order for the bidder to properly respond.
- All bids will be publicly opened at the time and place prescribed in the invitation for bids.
- A firm fixed price contract award will be made in writing to the lowest responsive and responsible bidder. Where specified in bidding documents, factors such as discounts, transportation cost, and life cycle costs must be considered in determining which bid is lowest. Payment discounts will only be used to

determine the lowest bid when prior experience indicates that such discounts are usually taken advantage of.

- Any or all bids may be rejected if there is a sound documented reason.

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

For competitive proposals, the following requirements apply:

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

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

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

Procurement by sole source should be limited.

2 CFR-FrequentlyAsked Questions 202150321.pdf (cfo.gov)

Obtaining Price/Rate Quotes for Federal Awards

The federal grant administrator or designee(s) is responsible for obtaining price/rate quotes. All price/rate quotes will be maintained with procurement documentation by the federal grant administrator and the Finance Department. The current list of grant administrators is as follows:

Grant	Grant Administrator
IDEA - Exceptional Education	Executive Director of Exceptional Education & Supplemental Services
GNETS	Director of GNETS
Title I, Part A	Director of Federal Programs
Schoolwide	Director of Federal Programs
School Improvement 1003(a)	Director of Federal Programs
Title II, Part A	Director of Federal Programs
Title III, Part A	Executive Director of Exceptional Education & Supplemental Services
Title IV, Part A	Director of Federal Programs
Title V, Part B	Director of Federal Programs

Price/rate quotes will be evaluated by the grant administrator to ensure that the purchase meets needs identified in the District or School Comprehensive Needs Assessment and/or Improvement Plan.

Advertisement of Bids for Federal Awards

The federal grant administrator is responsible for the bid process for their respective federal award as outlined above.

CONFLICT OF INTEREST (2 CFR Sec. 200.318(c)(1))

All Troup County School System employees are expected to exhibit professional behavior and ethical conduct. In accordance with policies BH – Board Code of Ethics, BHA – Board Member Conflict of Interest, and DJE – Purchasing, the Troup County School System adheres to standards regarding conflict of interest. These standards govern the actions of employees in the selection, award, and administration of contracts.

Definition

An interest may be defined as a commitment, goal, or value held by an individual or an institution. A conflict of interest is defined as a situation that has the potential to undermine the impartiality of a person because of the possibility of a clash between the person's self-interest and professional interest or public interest.

Conflict of Interest

The employees and consultants of the TCSS have the responsibility of administering the affairs of the system honestly and prudently, and of exercising their best care, skill, and judgment for the sole benefit of the system. Those persons shall exercise the utmost good faith in all transactions involved in their duties, and they shall not use their positions with the school

system or knowledge gained therefrom for their personal benefit. No employee, officer or agent may participate in selection, award or administration of a contract supported by a federal award if he/she has a real or apparent conflict of interest. The interests of the organization must be the first priority in all decisions and actions.

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

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

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

1. Owning stock or holding debt or other proprietary interests in any third party dealing with the system.

2. Holding office, serving on the board, participating in management, or being otherwise employed (or formerly employed) with any third party dealing with the system.

3. Receiving remuneration for services with respect to individual transactions involving the system.

4. Using time, personnel, equipment, supplies, or good will for other than system/program-approved activities, programs, and purposes.

5. Receiving personal gifts or loans from third parties dealing or competing with the system. Receipt of any gift is disapproved except gifts of a value less than $25, which could not be refused without discourtesy. No personal gift of money should ever be accepted.

The areas of conflicting interest listed above, and the relations in those areas which may give rise to conflict, as listed above, are not exhaustive. Conflicts might arise in other areas or through other relations. It is assumed that the directors, officers, and management employees will recognize such areas and relation by analogy. The fact that one of the interests described above does not necessarily mean that a conflict exists, or that the conflict, if it exists, is material enough to be of practical importance, or if material, that upon full disclosure of all relevant facts and circumstances it is necessarily adverse to the interests of the system.

However, any of the interests described above shall be disclosed before any transaction is consummated. It shall be the continuing responsibility of the board, officers, and management employees to scrutinize their transactions and outside business interests and relationships for potential conflicts and to immediately make such disclosures.

Transactions with parties with whom a conflicting interest exists may be undertaken only if all of the following are observed:

1. The conflicting interest is fully disclosed;

2. The person with the conflict of interest is excluded from the discussion and approval of such transaction;

3. A competitive bid or comparable valuation exists; and

4. The system has determined that the transaction is in the best interest of the organization.

Disclosure in the organization should be made to the Superintendent and/or designee.

The Superintendent and/or School Board shall determine whether a conflict exists and in the case of an existing conflict, whether the contemplated transaction may be authorized as just, fair, and reasonable to system. The decision of the Superintendent and/or School Board on these matters will rest in their sole discretion, and their concern must be the welfare of the system and the advancement of its purpose.

Nominal Items

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

Violations of the Conflict of Interest Policy

Violation of these standards will result in reporting of said personnel to the Superintendent and/or designee and if appropriate, local authorities. The Superintendent and/or designee shall be responsible for initiating the investigation. If an investigation substantiates occurrence of a fraudulent activity, the Superintendent/designee shall issue a report to the appropriate personnel and to the Board of Education. Final disposition of the matter and any decision to file a criminal complaint or refer the matter to the appropriate law enforcement and/or regulatory agency for independent investigation shall be made in consultation with legal counsel.

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

Conflict of Interest Training

Training on Fraud, Waste, Abuse and Corruption Prevention (Fraud Prevention DIE), which includes violation of conflict of interest policies, occurs annually. Each Troup County School System employee is required to attend the mandated training at the beginning of the year. New hires are also required to receive this training upon hire. Documentation is maintained utilizing the Vector Training software in the Human Resources Department.

METHODS FOR COLLECTION, TRANSMISSION, AND STORAGE OF INFORMATION (200.336)

Process	Format	Features
Collection	XLSX, DOCX, internal forms	Editable for internal use
Transmission	PDF/A, CSV, HTML, XML	Open, machine-readable, viewable, not easily modifiable
Storage	PDF/A, read-only HTML/XML, secure drives	Non-editable, organized, accessible

PERSONAL COMPENSATION POLICIES (2 CFR Sec. 200.430)

Compensation for personal services includes all remuneration, paid currently or accrued, for services of employees rendered during the period of performance under the federal award, including but not necessarily limited to wages and salaries. Costs of compensation are allowable to the extent that the compensation:

- Satisfies the specific requirements of the federal award.
- Is reasonable for the services rendered as compared to similar work activities of other non-federally funded Troup County School System (TCSS) employees or for similar work in the labor market in which the system completes.
- Conforms to the established written policies of the TCSS consistently applied to both federal and non-federal activities.

Compensation

Compensation for federal grants include the following:

- Salaries:
  - Staff paid from a federal award are paid based on the TCSS salary schedules for the current school year.
- Stipends:
  - There are two levels for stipends for Professional Learning/Staff Development
    - $250.00 a day for training of teachers on courses they are teaching
    - $35.00 per hour for content development Professional Learning
    - $250.00 (per induction teacher) paid to mentor teachers to mentor induction level teachers throughout the school year
- Substitutes: Substitute pay is based on the educational background of the substitute.
  - Full day compensation is as follows (Daily Rates):
    - Possession of a High School Diploma or GED certificate: $70.00
    - Completion of an Associate's Degree (transcripts required): $73.00
    - Completion of a 4-year degree or higher (transcripts required): $85.00
    - Possession of a valid or expired Georgia or out-of-state teaching certificate

based on a 4-year degree: $106.00
        - Retired Certified Teacher (Any County): $106.00
    - Long-term substitute compensation is as follows:
        - Long Term Sub Valid Out-of-Field Certificate, Expired In/Out-of-Field Certificate: $132.00
- Extended Learning:
    - Certified Staff:
        - Certified staff holding a valid teaching certificate will be paid for work in an approved extended learning program at their current hourly rate.
    - Classified Instructional Staff:
        - For work in an approved extended learning program, classified instructional staff will be paid at their current hourly rate.

Substitutes

The TCSS complies with the Official Code of Georgia (O.C.G.A.) certification requirements for substitutes by employing substitutes who most closely meet the requirements for certification.

Long-term substitute teachers, for the purpose of ESSA In-Field reporting requirements, are those filling in for a vacant teacher position for a period of four consecutive weeks or more. These long-term substitute teachers are the sole "teachers of record" because there are no teachers under contract for the class. If the position is "vacant", the substitute (if certified) is paid $132.00 per day.

If the substitute is working in a "staffed" position substituting for teachers under contract who are away temporarily and expected to return (i.e., teachers on medical or maternity leave), the district's long term substitute rate for a certified teacher is $125.00 per day. These long-term substitutes are not required to be reported under ESSA In-Field reporting requirements.

Time and Effort

The TCSS maintains time and effort records for all employees whose salaries or other compensation are paid in whole or in part with federal funds (not to exceed 100%). The following is implemented to ensure federal grant compliance:

- Professional qualifications are checked prior to hire and are maintained by the Human Resources Department
- All federally funded positions have job descriptions that are provided to all applicable employees
- Federal grant administrators/designees monitor the duties and responsibilities of federally funded staff along with the designated supervisor
- Monthly general ledgers are reviewed to ensure that payments are aligned with approved federal positions and the work performed
- Professional learning is documented to ensure compliance
- Federal grant administrators work with the Human Resources Department to ensure that staff are coded correctly on Certified/Classified Personnel Information (CPI) based on the work performed

Periodic Certifications

Periodic certifications are completed for staff working solely on a single cost objective and account for the total activity for the period covered by the certification. Charges for their salaries and wages are supported by periodic certifications. Periodic certifications must be:

- Completed after the fact
- Account for the total activity
- Signed by the supervisory official having first-hand knowledge of the work performed by the employee (printed name and signature)

The Semi-Annual Certification group form is used to certify that the employees listed worked 100% of their time solely on activities in the specified positions as authorized by the designated federal program(s) listed. The form must be signed by a supervisory official having first-hand knowledge of the work performed by the employees listed on the form. The form is completed every six months for any employee who is paid solely with federal funds for the specified position(s). The time periods are as follows:

- Time Period: July-December
    - Certification completed in January/February
- Time Period: January-June
    - Certification completed in July/August

After expenditure verification, the federal grant administrator or designee creates the Semi- Annual Certification group form based on the current form listed on the GaDOE website.

This form is sent to the appropriate supervisor who has first-hand knowledge of the work performed by the employees listed on the form. The supervisor then reviews the list to ensure staff performed the appropriate duties. Any corrections are made as needed by the federal grant administrator or designee. Since the form is an after-the-fact certification of time worked, the supervisor will sign and date verifying the work of the listed employees after the period of time listed and upon receipt from the federal grant administrator.

This form is then collected and reviewed by the applicable federal grant administrator.

Personnel Activity Reports (Time Logs)

Personnel Activity Reports (PAR) or time logs are completed for staff working on multiple cost objectives and account for the total activity of the staff. Split-funded personnel are required to maintain a monthly time log delineating the specific federal grant and non-federal grant duties or other federal program duties performed.

Split-funded staff are provided the current time log listed on the GaDOE website by the federal grant administrator or designee by the first day of work for the applicable school year. The time log used will depend on the number of funding sources.

Detailed monthly time logs must:

- Reflect an after-the-fact distribution of the actual activity of each employee
- Account for the total activity for which each employee is compensated

- Coincide with one or more pay periods
- Be signed and dated by the employee
- Be signed and dated by the supervisor having first-hand knowledge of the work performed by the employee

Additionally, the fixed schedule must identify the cost objective/fund source for each time period. Employee schedules identifying the time funded by all fund sources may be used if the personnel have a fixed daily schedule.

The following procedures for time logs must be followed:

- Time logs must be electronically completed in the excel workbook provided to ensure that the hours for month and year to date calculate correctly
- Completed time logs are submitted to the immediate supervisor for review and approval (signature and date)
- Completed time logs must be submitted to the federal grant administrator by the date provided (completed and submitted monthly). The federal grant administrator is responsible for collecting the forms
- The duties on the time log must be specific regarding the grant activities and responsibilities provided by the split-funded personnel
- Supporting documentation is maintained by the staff member completing the time log. Artifacts should be relevant to the position funded and may include but are not limited to agendas, calendar of work, schedules, and routes.
- Teacher class schedules may be turned in at least biannually (August and January) instead of time logs if the employee has a fixed daily schedule

The applicable federal grant administrator(s) will review the split-funded log for allowability and monthly percent/time breakdown. The federal grant administrator will work with the Chief Financial Officer or designee quarterly to reconcile payroll charged based on the actual percent of time charged to the listed funding sources. A final reconciliation/adjustment is completed at the end of the year if needed to ensure that the final amount charged to the federal award is accurate, allowable, and properly allocated.

FEDERAL SUBSTITUTE PROCEDURE

Substitutes paid with federal funds may be available for approved professional learning activities that are above and beyond general requirements. Each of the following procedures must be correctly followed for professional learning participants to receive a stipend payment.

Substitute Allowability and Purpose:

- For a federally funded professional learning activity to be approved by the grant administrator, it must align with allowable initiatives identified in the district's or school's Comprehensive Needs Assessment (CNA) and action steps listed in the Continuous System Improvement Plan (CSIP) or School Improvement Plan (SIP) that result in increased student achievement.
- Substitutes are provided for the following activities:
  - Instructional strategies
  - Professional learning in core subjects (ELA, math, science, social studies)

- Non-academic items listed in CNA, CSIP and SIP
- All professional learning must be in a professional setting such as the school or Central Office.

Substitute Compensation: Substitute pay is based on the educational background of the substitute.

- Full day compensation is as follows (Daily Rates):
  - Possession of a GED certificate: $65.00
  - Possession of a High School Diploma: $70.00
  - Completion of an Associate's Degree (transcripts required): $73.00
  - Completion of a 4-year degree or higher (transcripts required): $85.00
  - Possession of a valid or expired Georgia or out-of-state teaching certificate based on a 4-year degree: $106.00
  - Retired Certified Teacher (Any County): $106.00
- Long-term substitute compensation is as follows (Daily Rates):
  - Long Term Sub Valid Out-of-Field Certificate, Expired In/Out-of-Field Certificate: $106.00
  - Long Term Sub/Valid "In-Field" Certificate: $132.00

- Extended Learning:
  - Certified Staff:
    - Certified staff holding a valid teaching certificate will be paid for work in an approved extended learning program at their current hourly rate.
  - Classified Instructional Staff:
    - For work in an approved extended learning program, classified instructional staff will be paid at their current hourly rate.

STIPEND POLICY (GaDOE Rule 160-3-3.04)

Stipends are funds awarded by the district to certified personnel for successfully completing learning opportunities that have occurred at any time during the fiscal year outside of the employee's normal contract/work hours (GaDOE Rule 160-3-3.04). Learning opportunities include successful completion of conferences, workshops, or courses approved by the Assistant Superintendent of Curriculum, Instruction and Professional Learning, Elementary/Secondary Director, and federal grant administrator.

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

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

Professional Learning

Professional learning will be on evidence-based instructional approaches that lead to increased educator effectiveness and student learning. The critical components addressed in professional learning should include:

- Knowledge – What one learns and understands
- Skills – What one is able to do
- Practices – What one implements routinely
- Dispositions – What one values and is doing

Every Student Succeeds Act (ESSA) Definition of Professional Development

Under ESSA, professional development means activities that —

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

(B) are sustained (not stand-alone, 1-day, or short term workshops), intensive, collaborative, job-embedded, data-driven, and classroom-focused, and may include activities that—

(i) improve and increase teachers'—

(I) knowledge of the academic subjects the teachers teach;

(II) understanding of how students learn; and

(III) ability to analyze student work and achievement from multiple sources, including how to adjust instructional strategies, assessments, and materials based on such analysis;

(ii) are an integral part of broad school-wide and district-wide educational improvement plans;

(iii) allow personalized plans for each educator to address the educator's specific needs identified in observation or other feedback;

(iv) improve classroom management skills;

(v) support the recruitment, hiring, and training of effective teachers, including teachers who became certified through State and local alternative routes to certification;

(vi) advance teacher understanding of—

(I) effective instructional strategies that are evidence-based; and

(II) strategies for improving student academic achievement or substantially increasing the knowledge and teaching skills of teachers;

(vii) are aligned with, and directly related to, academic goals of the school or local educational agency;

(viii) are developed with extensive participation of teachers, principals, other school leaders, parents, representatives of Indian tribes (as applicable), and administrators of schools to be served under this Act;

(ix) are designed to give teachers of English learners, and other teachers and instructional staff, the knowledge and skills to provide instruction and appropriate language and academic support services to those children, including the appropriate use of curricula and assessments;

(x) to the extent appropriate, provide training for teachers, principals, and other school leaders in the use of technology (including education about the harms of copyright piracy), so that technology and technology applications are effectively used in the classroom to improve teaching and learning in the curricula and academic subjects in which the teachers teach;

(xi) as a whole, are regularly evaluated for their impact on increased teacher effectiveness and improved student academic achievement, with the findings of the evaluations used to improve the quality of professional development;
(xii) are designed to give teachers of children with disabilities or children with developmental delays, and other teachers and instructional staff, the knowledge and skills to provide instruction and academic support services, to those children, including positive behavioral interventions and supports, multi-tier system of supports, and use of accommodations;
(xiii) include instruction in the use of data and assessments to inform and instruct classroom practice;
(xiv) include instruction in ways that teachers, principals, other school leaders, specialized instructional support personnel, and school administrators may work more effectively with parents and families;
(xv) involve the forming of partnerships with institutions of higher education, including, as applicable, Tribal Colleges and Universities as defined in section 316(b) of the Higher Education Act of 1965 (20 U.S.C. 1059c(b)), to establish school-based teacher, principal, and other prospective teachers, novice teachers, principals, and other school leaders with an opportunity to work under the guidance of experienced teachers, principals, other school leaders, and faculty of such institutions;
(xvi) create programs to enable paraprofessionals (assisting teachers employed by a local educational agency receiving assistance under part A of Title I) to obtain the education necessary for those paraprofessionals to become certified and licensed teachers;
(xvii) provide follow-up training to teachers who have participated in activities described in this paragraph that are designed to ensure that the knowledge and skills learned by the teachers are implemented in the classroom; and
(xviii) where practicable, provide jointly for school staff and other early childhood education program providers, to address the transition to elementary school, including issues related to school readiness.

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

Stipends may only be awarded if the following conditions exist:

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

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

FEDERAL STIPEND PROCEDURE

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

Stipend Allowability and Purpose:

- For a federally funded professional learning activity to be approved by the grant administrator, it must align with allowable initiatives identified in the district's or school's Comprehensive Needs Assessment (CNA) and action steps listed in the Improvement Plan (SIP) that result in increased student achievement.
- Stipends are extra pay for learning and effort that is above and beyond what is generally required and is outside of normal contract hours. Unit/lesson planning are considered normal duties.
    - Administrators may receive stipends on off-contract days only.
    - Classified staff are not eligible for stipends and must be paid their hourly rate or time and a half if applicable.
    - Data analysis sessions may be conducted where student performance is analyzed and students are grouped by the next intervention to implement.
        - The Data Analysis Planning Sheet must be submitted with the other required stipend packet materials.
- All professional learning must be in a professional setting such as the school or Central Office.

Stipend Amount:

- There are two levels for stipends for Professional Learning/Staff Development
    - $200.00 a day for training of teachers on courses they are teaching
    - $30.00 per hour for content development Professional Learning
    - $500.00 (per induction teacher) paid to mentor teachers to mentor induction level teachers throughout the school year

- An annual stipend may be awarded to employees who carry out additional duties to assist with state/system/school initiatives (ex. PBIS Coaches) Annual stipends could range between $1,200 and $1,700.

Documentation must be submitted to the grant department by the end of the month in which the professional learning occurred.

Processing for Payroll:

- The grant administrator will sign-off on the stipend documentation and submit the packet to the Finance Department for payment.
- Payment will be made according to the payroll deadlines.
    - Ensure stipend documentation is submitted to the grant department in time for processing and in time to obtain any needed corrections.
    - Stipends cannot be processed until all required and correct documentation is received.
    - Payments will be included in the employee's regular monthly paycheck unless otherwise specified.

FRINGE BENEFITS POLICY (200.431)

The LEA provides for the cost of fringe benefits in the form of employer contributions or expenses for social security; employee health, unemployment, worker's compensation and Teacher Retirement System.
The LEA relies on state-approved accounting software that automatically calculates fringe benefits based on approved salary schedules and benefit rates. These systems are regularly updated to reflect current benefit rates for health insurance, retirement contributions, and other required withholdings.

EMPLOYEE HEALTH AND WELFARE COSTS POLICY (200.437)

The LEA does not spend federal funds in the areas related to improving working conditions, employer-employee relations, employee health and employee performance.

PARTICIPANT SUPPORT COSTS (200.456)

Participant support costs are direct costs for items such as stipends or subsistence allowances, travel allowances, and registration fees paid to or on behalf of participants or trainees (but not employees) in connection with conferences, training, or other federally sponsored projects.

LEA allows participant support costs under the following conditions:

1. Allowability:
   Participant support costs are allowable only with prior written approval from the federal awarding agency or pass-through entity, as required.
2. Definition of Participants:
   Participants are individuals not employed by the LEA who are engaged in training, workshops, or other activities supported by a federal grant but are not performing work or providing services for the LEA.
3. Examples of Allowable Participant Support Costs:
   - Stipends or subsistence allowances
   - Travel expenses (mileage, airfare, lodging, meals)
   - Registration fees for training/conferences
   - Training materials and supplies for participants
4. Unallowable Costs:
   Participant support funds must not be used to support LEA staff salaries, fringe benefits, or general operational expenses unless specifically approved in the grant award.
5. Accounting and Tracking:
   All participant support costs must include supporting documentation (e.g., sign-in sheets, agendas, reimbursement forms).
6. Internal Controls:
   The LEA ensures internal controls are in place to verify that:
   - Participants meet eligibility criteria
   - Costs are aligned with the approved budget and scope of work
   - No duplication of benefits occur

TRAVEL COSTS POLICY (2 CFR Sec. 200.475)

Employees may be reimbursed for travel expenses incurred in the course of performing job duties. Allowable expenses may include transportation, subsistence, lodging, and other related items subject to certain limitations and proper documentation if incurred by an employee who is in travel status on official business of the district.

Costs incurred by employees and officers for travel, including costs of lodging, other subsistence, and incidental expenses, must be considered reasonable and otherwise allowable only to the extent such costs do not exceed charges normally allowed by the district in its regular operations as the result of the district's written travel policy. In addition, if these costs are charged directly to the federal award documentation must justify that:

- Participation of the individual is necessary to the federal award; and
- The costs are reasonable and consistent with the district's established travel policy

Travel may be covered with federal grant funds under the following conditions:

- Travel costs for workshops and conferences that are instructionally focused
- Travel costs that are necessary to manage the program
- Travel costs must be reasonable and consistent with the written travel and reimbursement policies outlined below
- Participation in an individual conference is necessary for the project as determined by the agenda
- Travel costs are pre-approved by the applicable grant administrator
    - IDEA – Exceptional education – Executive Director of Exceptional Education
    - GNETS – Director of GNETS
    - Title I, Part A – Director of Federal Programs
    - Title II, Part A – Director of Federal Programs
    - Title III, Part A – Executive Director of Exceptional Education
    - Title IV, Part A – Director of Federal Programs
    - Title V, Part B – Director of Federal Programs
    - Title IX, Part A – Director of Federal Programs
    - School Improvement 1003a – Director of Federal Programs

General Travel Procedures

The Troup County School System follows the Georgia statewide travel rates for all travel. Additional procedures for allowability are implemented for federal grants.

Transportation (Mileage)

- The board will reimburse employees the mileage rate as determined by the State Accounting Office when a personal vehicle is used for in-system travel and out-of-system when a system car is not available. The TCSS will follow the Georgia statewide travel rate.
- For out of state travel, receipts for commercial transportation must be attached to the reimbursement request. The employee is responsible for ensuring that the lowest possible fare is obtained (airfare, taxi/shuttle, and rental car).

Meals

- Employees may only be reimbursed for the meals purchased while officially

on travel status.

- General Meal Requirements: In all cases, reimbursement will be made based on per diem rates.
- Meal Limits: Maximum reimbursement per meal are found on the U.S. General Services Administration (GSA) Per Diem Rates/Meals and Incidental Expenses Breakdown at gsa.gov.
- Lodging: Reimbursement will be made for actual lodging expenses, provided the expenses are reasonable and are necessary to provide travel time to reach the start of the event. Employees should obtain a Hotel/Motel Tax Exemption and Sales Tax Certificate of Exemption forms from the funding department prior to travel within Georgia, Florida and Texas. Employees are required to submit receipts documenting lodging expenses. Expenses which exceed "reasonable rates" must be explained. For out of state travel, local and hotel taxes may be reimbursed. Employees will be required to submit documentation of lodging expenses upon their return.
- Other Expenses: Documentation must be submitted for any other expenses submitted for reimbursement.

Travel Reimbursement

- Travel Expense Forms: The Troup County expense form is utilized for travel inside and outside Troup County.
- Travel Reimbursement Form Procedures: Use the proper form to document mileage, meal charges, lodging, and other related expenses. When submitting the reimbursement form, the following items are to be completed to avoid delays in the reimbursement process:
    - Employee Signature
    - Supervisor Signature
    - Funding Code
    - Documentation that must be maintained and attached include (if applicable):
        - Conference Agenda/Certificate/Session Grid/Notes/Handouts
        - Receipts for Lodging
        - Receipts for Other Expenses
- Submission: Submit the travel reimbursement form to the Federal Programs department within 45 days of the dates of travel. Once approved, the form will be sent to the Finance Department for inclusion in a normal weekly check run/direct deposit.
    - Grant administrators will approve all travel prior to payment.
    - Documentation will be maintained by the grant administrator and the Finance Department.

REQUESTING AND REGISTERING FOR RESA PROFESSIONAL LEARNING

Federal Grant Requirements for RESA Professional Learning:

For a federally funded professional learning activity to be approved by the grant administrator, it must align with allowable initiatives identified in the school/district Comprehensive Needs Assessment and action steps listed in the school/district Improvement Plan that result in increased student achievement. This also applies to payment for substitutes with federal funds for staff attending professional learning activities.

All sessions of the professional learning must be allowable under ESSA guidelines and all approved sessions must be attended.

The entire session of the professional learning must be attended from the start time to the end time.

Prior approval for the allowable professional learning must be obtained from the applicable grant office. Prior approval includes:

- Approved agenda or flyer for the professional learning
- Approved professional learning form

If the requirements as outlined in this procedure are not followed, the RESA professional learning registration and/or substitute may not be paid for with federal funds and another fund source must be used.

Requesting Professional Learning through RESA:

Requests to attend allowable professional learning through RESA utilizing federal funds are initiated at the school/department level.

Timeline:

- The staff member attending the professional learning must complete a professional learning form and submit to the federal programs department. The professional learning flyer or agenda with description of the professional learning should be attached.
    - Absences must indicate if federal funds are requested to pay for a substitute for the staff member attending the professional learning.
- If federal funds are requested to pay for the professional learning registration cost, the school/department secretary should submit a requisition for a purchase order. Requisitions should be entered promptly in order to allow time for processing by the Finance Department and the applicable grant department.
- If the grant administrator determines that the professional learning is unallowable under ESSA and system guidelines, the grant bookkeeper will notify the school/department secretary.

Registering for Professional Learning through RESA:

Staff should register for allowable RESA professional learning through the RESA online registration system **after the school principal or designated staff member has approved for the requesting staff member to attend**.

RESA registrations within the RESA online registration system for professional learning utilizing federal funds should not be approved by the school principal or designated staff member until the following has been completed:

- The staff member has accurately completed a professional learning form and the absence has been approved at all required approval levels.
- A purchase order has been received and approved by the grant administrator (if applicable).

If the RESA registration within the RESA online registration system is approved at the school level by the principal or designated staff member prior to approval of the absence by all required approval levels and purchase order approval (if applicable), federal funds may not be used to pay for the professional learning and/or substitute and another fund source must be used.

Cancellation or Reassignment of Professional Learning through RESA:

In the event a staff member cannot attend scheduled and approved RESA professional learning, the staff member should inform the school/department secretary immediately who must in turn notify the grant bookkeeper promptly to request one of the following actions:

- The school/department may request that the approved purchase order be voided.
    - The grant bookkeeper will void the approved purchase order and send a copy of the voided purchase order to the school/department secretary.
    - The staff member or school/department is responsible for canceling the professional learning registration within the RESA online registration system or through RESA.
- The school/department may request that another allowable staff member attend the approved professional learning in place of the staff member unable to attend.
    - The school/department secretary should contact the grant bookkeeper and provide the name and position of the staff member recommended to replace the staff member unable to attend.
    - The grant administrator will review the recommended replacement and determine if the staff member is allowed to attend.
    - If the recommended replacement is approved by the grant administrator, the staff member must immediately complete a professional learning form and it must be approved at all required approval levels.
    - The staff member or school/department is responsible for completing or changing the registration as required within the RESA online registration system or through RESA.
    - The grant administrative assistant will update the approved purchase order and forward a copy to the school/department secretary.
- For unapproved staff members who attend professional learning for staff members originally approved but are unable to attend, federal funds may not be used to pay for the professional learning and/or substitute and another fund source must be used.

CONFERENCE/TRAINING SESSION SELECTION PROCEDURE

Professional trainings or conferences must align with allowable initiatives identified in the district's or school's Comprehensive Needs Assessment (CNA) and action steps listed in the Improvement Plan (IP) that result in increased student achievement.

If a conference/training agenda is published prior to the event, each participant must submit an agenda to the grant administrator for approval with chosen sessions marked for out-of-county professional learning activities. Staff members may select as many sessions as desired to account for full or canceled sessions. The selections should be submitted for review no later than 10 school/business days (excluding holidays) prior to the start of the conference/training.

Conference/training session guidelines:

- Sessions must align to identified needs in the school/district CNA and SIP/CSIP.
- Multiple staff members attending the same conference/training should attend different allowable sessions to gain the maximum benefit of the conference/training.
- Sessions should be related to the grade/content area of the attendee (if applicable).
- Selected sessions should cover the entire length of the conference/training.

The grant administrator will review the selected sessions for allowability and alignment with the identified needs. The grant administrator/designee will send an approval email to the staff member requesting the professional leave and copy their supervisor. If changes to the selected sessions are needed, the grant administrator/designee will work with the staff member to select alternate allowable sessions.

If there are not enough allowable sessions to attend during the entire conference/training, the cost of the conference/training must have to be transferred to another fund source. Attending unallowable sessions may result in 100% of the conference/training registration and associated costs (travel, hotel, substitutes) being moved to General Fund.

OUT-OF-STATE CONFERENCE PROCEDURE

For a federally funded professional learning activity to be approved by the grant administrator, it must align with allowable initiatives identified in the district's or school's Comprehensive Needs Assessment (CNA) and action steps listed in the Improvement Plan (IP) that result in increased student achievement.

For administrators who have selected an out-of-state conference that meets an identified need, the professional leave form must be completed for each attendee and turned in at least one month in advance.

Request Approval:

The applicable grant administrator must also ensure that the conference request is allowable, is reasonable and necessary, and meets an identified need. Out-of-state conferences must also be specifically listed in the CNA and IP. If approved by the grant administrator, the request will be submitted as part of the grant application in the Consolidated Application for approval by the Georgia Department of Education.

Professional Leave Approval:

The first step in the process for professional leave approval is to complete a professional learning form. The conference agenda must be attached to the professional learning form. If a detailed agenda is not available, a conference overview (list of main session and breakout session times) may be attached until the agenda is released. Upon release of the agenda, it must be sent and attached to the original professional learning form.

Professional Learning Redelivery:

It is expected that each attendee redeliver the content of the professional learning to their department or school in order for the maximum benefit of the conference to be received.

The bookkeeper, administrator, or designated staff member must submit the redelivery materials (agenda(s), sign-in-sheet(s), training materials) to the applicable grant administrator within 10 business/school days of the approved redelivery session.

Purchase Order Process:

After approval of professional learning, the school/department bookkeeper may enter purchase orders for the registration, hotel, and flight (if applicable). This process should be completed at least one month prior to the event or earlier in order to secure the early or regular registration for planned events listed in the Improvement Plan.

- Conference Registration
    - The system will only fund conference fees for early/regular registration.
- Hotel
    - Hotel costs must be reasonable and approved by the grant administrator.
    - Hotel costs should be booked at the per diem rate - if not, documentation will be retained to justify any additional expenses
    - Hotel stays may only be funded for the nights required for the conference.
        - If travel time from the approved point of origin is greater than the time available prior to the start of the conference, an additional night may be secured. Examples are as follows:
            - If the conference starts at 5 p.m. and the travel time is 6 hours, a hotel stay for the night before would not be allowable.
            - If the conference starts at 10 a.m. and the travel time is 6 hours, a hotel stay for the night before would be allowable.
        - If travel time to the approved designated endpoint is greater than the time available after the end of the conference, an additional night may be secured.
            - If the conference ends at 4 p.m. and the travel time is 6 hours, a hotel stay for the night after the conference would not be allowable.
            - If the conference ends at 6 p.m. and the travel time is 6 hours, a hotel stay for the night after the conference would be allowable.
    - If federal funds are used for hotel costs, the school/department bookkeeper should ensure that the hotel accepts checks from the participant upon check-in. If checks are not accepted, the bookkeeper will coordinate with the Accounts Payable Clerk

in the Finance Department to use the system credit card. Hotel reimbursements will not be made to staff members. Additional allowable hotel charges may be reimbursed through the travel reimbursement process.

- Airfare
    - Airfare may be secured if the driving distance to the conference is not reasonable (greater than 6 hours).
    - The staff member traveling and the school/department bookkeeper are responsible for obtaining the lowest possible airfare.
    - Only basic economy class is considered reasonable and necessary. Upgrades to other cabin classes are not allowable.
    - A reasonable amount of luggage may also be checked.

Once approved purchase orders are received at the school/department level, conference registration and hotel/flight reservation may be made. If registrations or reservations are dated prior to the date on the approved purchase order, federal funds will not be used to cover the associated costs.

- Flights must be booked on the same day as purchase order approval or receipt to ensure that the purchase order price is received.
- The grant bookkeeper will coordinate this process with the school/department.
- A copy of the conference registration and hotel/flight reservation should be forwarded to the grant administrator for documentation purposes.
- Conference registrations and hotel/flight reservations made prior to the receipt of the approved purchase order will not be paid for with federal funds.

Conference Session Selection:

Once the agenda for the conference is posted, sessions should be selected and forwarded to the applicable grant administrator to ensure allowability with the grant. This should be done at least 10 business/school days prior to the event. If there are not enough allowable sessions to attend during the entire conference, the cost of the conference must be transferred to another fund source. Attending unallowable sessions may result in 100% of the conference registration and associated costs (travel, hotel, substitutes) being moved to General Fund. Multiple staff members attending the same conference should select different sessions in order to receive the maximum benefit of the conference.

No Shows:

No shows for conferences, hotels or flights may not be paid with federal funds. Emergency situations will be reviewed on a case by case basis by the grant administrator.

Conference Attendance:

Due to the high cost of conferences and associated travel, the entire conference must be attended. Participants must attend each of their approved conference sessions and stay for the full duration of the conference.

Breakfast and lunch meals should be planned accordingly to ensure sessions are not missed and sessions should not be left to obtain meals.

Late arrivals or early departures should not occur unless preapproved by the grant administrator.

If sessions are attended that are not allowable under ESSA guidelines or the staff member does not attend all of the approved sessions scheduled to be attended, the conference registration, hotel/flight charges, and any allowable costs to be submitted as travel reimbursements may not be paid with federal funds and must be paid with another funding source.

Travel Reimbursement:

Any reimbursement request that is not associated with the purpose of travel and does not meet ESSA guidelines and requirements of the grant and the Finance Department will not be approved. The travel reimbursement must be completed within 45 days from the last date of travel. A zero balance hotel receipt must be submitted to the grant administrator within 10 business/school days from the last day of travel.

Final Agenda:

A final agenda must be submitted to the grant administrator within 45 business/school days from the last day of travel. The agenda must indicate through circle or highlight all of the sessions (to include keynote, opening and closing sessions) that were attended. The staff member must initial next to each session attended.

TRAVEL REIMBURSEMENT PROCEDURE

Federal Grant Requirements for Travel Reimbursements:

For any costs associated with conferences, training, and events to be paid with federal funds, the conference, training, or event must be listed in the school/district Improvement Plan. All sessions attended must be allowable under ESSA guidelines.

Sessions must meet allowability guidelines for the utilized grant.

- For Title I, session topics must align with allowable initiatives identified in the school/district Comprehensive Needs Assessment (CNA) and action steps listed in the school/district Improvement Plan (IP) that result in increased student achievement.
- For Title II, session topics must align with allowable initiatives identified in the District CNA and district IP that increase academic achievement by improving the effectiveness of teachers, principals, and other school leaders.
- If multiple staff members are attending the same conference, different sessions should be attended to receive the maximum benefit from the content and to demonstrate that attendance is reasonable and necessary.

Sessions must be attended from the start to end time of the conference or training.

Late arrivals or early departures should not occur unless preapproved by the applicable grant department.

Breakfast and lunch meals should be planned accordingly to ensure that sessions are

not missed. Sessions should not be left to obtain meals.

If sessions are attended that are not allowable under ESSA guidelines or the staff member does not attend all of the approved sessions scheduled to be attended, the conference, training, or event registration, hotel charges and any costs to be submitted as travel reimbursements may not be paid with federal funds and must be paid with another funding source.

Any reimbursement request that is not associated with the purpose the travel and does not meet ESSA guidelines and requirements of the Finance Department will not be approved.

Required Employee Expense Statements:

Copy of professional leave approval

- Leave approval must be approved by all required levels prior to the event.

Legible and complete copy of conference, training, or event agenda.

- Sessions attended must be circle or highlighted.
- The front page of the agenda must be included.
- The entire time of the conference or training must be accounted for on the agenda. For example, if keynote sessions are attended in between concurrent sessions, they must also be circled or highlighted.

Detailed, itemized receipts incidentals to include parking, taxis/rideshares and baggage if claiming reimbursements for these expenses.

Staff may only be reimbursed for their own expenses.

Employee expense statements submitted without these attachments will be returned for corrections.

Completing the Employee Expense Statement:

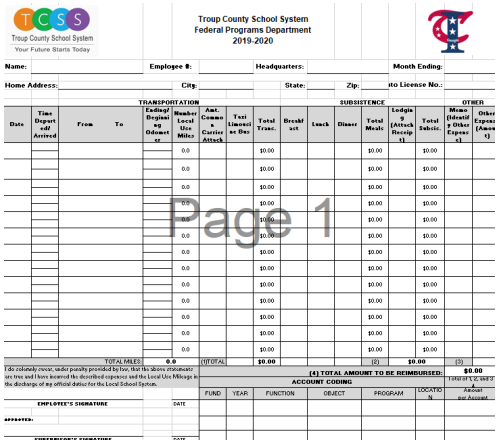
Timeline:

- Completed employee expense statements with required attachments must be submitted to the grant department no later than 45 working days from the last date of travel to allow for review, corrections if needed and approval at all levels.
- For travel completed in June, employee expense statements with required attachments must be submitted to the grant department no later than June 30th in order to meet fiscal year requirements.
- Reimbursement documents and/or requested corrections not received by established due dates may not be approved.

Forms:

- The most current form must be used.
- The employee expense statement must be completed in ink, not pencil, and must contain no white out.

- Entries must be legible and neatly written.
- Scratch outs are not allowable.
- Small corrections may be made on the employee expense statement with one neat strike through and a legible correction. All corrections must be initialed and will be reviewed for acceptability.



Troup County School System
Your Future Starts Today

Troup County School System
Federal Programs Department
2019-2020

Name: Employee #: Headquarters: Month Ending:

Home Address: City: State: Zip: Auto License No.:

				TRANSPORTATION						SUBSISTENCE				OTHER	
Date	Time Depart and/ Arrived	From	To	Ending/ Beginning Odometer	Number Local Use Miles	Amt. Common Carrier Attach	Taxi Limousine Bus	Total Trans.	Breakfast	Lunch	Dinner	Total Meals	Lodging (Attach Receipt)	Total Subsic.	Misc (Identify Other Expenses)	Other Expenses (Amount)
					0.0			$0.00				$0.00		$0.00		
					0.0			$0.00				$0.00		$0.00		
					0.0			$0.00				$0.00		$0.00		
					0.0			$0.00				$0.00		$0.00		
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					0.0			$0.00				$0.00		$0.00		
					0.0			$0.00				$0.00		$0.00		
					0.0			$0.00				$0.00		$0.00		
					0.0			$0.00				$0.00		$0.00		
					0.0			$0.00				$0.00		$0.00		
					0.0			$0.00				$0.00		$0.00		
			TOTAL MILES:	0.0	(1)TOTAL			$0.00				(2)		$0.00	(3)	

I do solemnly swear, under penalty provided by law, that the above statements are true and I have incurred the described expenses and the Local Use Mileage in the discharge of my official duties for the Local School System.

(4) TOTAL AMOUNT TO BE REIMBURSED: $0.00

ACCOUNT CODING

FUND	YEAR	FUNCTION	OBJECT	PROGRAM	LOCATION	Amount per Account

EMPLOYEE'S SIGNATURE DATE

APPROVED:

SUPERVISOR'S SIGNATURE DATE

Page 1

Heading:

- The staff member's legal name as reflected on payroll documents should be entered.
- The employee number, school/department name, home address and driver's license number should be entered. If staff will not drive during the travel or are not requesting reimbursement for mileage, the driver's license number may be left blank.

Dates, Times and From/To:

- The date of travel should be entered.
- The departure time and arrival time for the first destination should be entered.
- The departure and arrival location should be entered in the From and To block for <u>each</u> trip made, condensing or abbreviating as needed.
- This process should be repeated for each trip made to and from the destination for all dates of travel as well as for trips made while at the destination that are associated with the purpose of the travel.

Mileage:

- The beginning odometer reading should be entered in the bottom portion and the ending odometer reading should be entered in the top portion of the block if reimbursement for mileage in a personal vehicle is claimed.

        - The number of miles based on odometer readings should be calculated and entered in the Number of Miles block.
        - The number of miles should be multiplied by the current mileage rate listed to obtain the cost for that trip and entered in the Cost of Mileage block.
        - This process should be repeated for each trip made that is associated with the purpose of the travel.
        - While mileage may vary slightly due to traffic patterns, road conditions, etc., mileage reported that greatly exceeds travel website calculations will be reviewed.
        - The total number of miles for each date of travel should be added and entered in the Total Miles block.
        - The total cost of mileage for all dates of travel should be added and entered in the Total Cost block. The total number of miles should not be multiplied by the mileage rate as this method may differ slightly from adding each individual days' totals.

    Meal Charges:

    - Meals for day travel to conferences, training and school related events are not reimbursable.
    - If the event provides any or all meals during a day and a staff member chooses to pay for a meal on their own, reimbursement for those meal costs will not be approved.
    - Alcoholic beverages and food gifts for family or friends are not reimbursable.
    - Reasonable tips for meals may be reimbursed up to the per diem amount.
    - Reimbursement amounts for meals are obtained from the U.S. General Services Administration website: https://www.gsa.gov/travel/plan-book/per-diem-rates.
        - Once on the website, the destination city and state should be entered.
    - Purchased meals that exceed the per diem amount for the area of travel will only be reimbursed up to per diem rate.
    - The total cost of meals for each date of travel should be added and entered in the Total Meals block.

    Lodging:

    - This column should not be completed.
    - All lodging paid with federal funds is paid by check from the Finance Department and will not be reimbursed.
    - A zero balance receipt for the hotel stay must be emailed to the applicable grant department <u>within 45 business days from the last day of travel</u> to close out the hotel purchase order with the grant department.

- Other:
    - This column may be used for incidental expenses to include parking, taxi/rideshare services, and baggage when necessary.
        - Parking:
            - Self-parking fees associated with the purpose of the travel may be reimbursed up to the per diem amount. This includes self-parking fees incurred if travel is required from a hotel to a different

location for a conference, training or event.
        - Valet parking fees may only be reimbursed if self-parking is unavailable at a hotel or if a nearby self-parking facility within walking distance is unavailable. Staff may opt to pay for valet parking on their own but no portion of the valet parking charge will be reimbursed.
        - Receipts for all parking must be provided for requested reimbursements.
    - Taxi/Rideshare Services:
        - Taxi/rideshare service fees associated with the purpose of the travel may be reimbursed up to the per diem amount.
        - Reasonable tips for taxi or rideshare services may be reimbursed up to the per diem amount.
        - It is the responsibility of the employee to ensure the lowest possible fare is obtained.
        - Receipts for all taxi/rideshare services must be provided for requested reimbursements.
    - Baggage:
        - Costs for excess baggage for required training materials related to the purpose of the travel must be preapproved by the grant department.
        - Receipts for excess baggage must be provided for requested reimbursements.
    - Rental Cars:
        - Costs for a rental car may include the rental fee and gas for the rental car if the expense was preapproved by the grant department.
        - Mileage cannot be reimbursed for a rental car as mileage is only for personal vehicles.
- Totals:
    - The total miles for each day of travel should be added and entered in the Total Miles blank (if applicable).
    - The total cost of mileage for each day of travel should be added and entered in the Total Cost blank (if applicable).
    - The total cost of meals for each day of travel should be added and entered in the blank under the Total Meals column (if applicable).
    - The total cost of other incidentals (parking, taxis/rideshares, baggage, rental car) for each day of travel should be added and entered in the blank under the Other column (if applicable).
    - The total of cost of mileage, meals and incidentals as applicable should be added and entered in the Total Amount to be Reimbursed blank.
- Funding Code: The grant administrator will enter the correct fund code to be charged.
- Signatures:
    - The form must be signed and dated in BLUE/BLACK ink by the employee as this is a financial document.
    - The supervisor's signature and date must be in BLUE/BLACK ink and dated the same date or after the employee signs.
    - All dates must be after the last day of travel.

- Corrections to Employee Expense Statements and Attachments:
    - Corrections needed will be requested via email from the grant department with a deadline in order to meet the Finance Department's timeline for processing reimbursements.
    - Corrections not received by the established deadline may not be approved for payment.

- Payment for Requested Reimbursements:
    - If approved at all levels, staff will receive payment for travel expenses in the form of a check/direct deposit from the Finance Department based upon the date of receipt of the complete and correct travel reimbursement documentation.
    - Checks are normally cut each week by Accounts Payable depending on the school calendar.

- Approved Employee Expense Statements:
    - All approved and paid employee expense statement packets will be maintained by the grant department and Finance Department.

SUSPENSION AND DEBARMENT (2 CFR §200.213)

Non-federal entities are subject to procurement and non-procurement debarment and suspension regulations implementing Executive Orders 12549 and 12689, 2 CFR Part 180.220. These regulations restrict awards, sub-awards, and contracts with certain parties that are debarred, suspended, or otherwise excluded from or ineligible for participation in federal assistance programs or activities.

The purpose of the debarment and suspensions system is to protect the public interest and ensure the integrity of federal programs by only conducting business with responsible parties. Excluded parties are ineligible to participate in procurement and non-procurement transactions.

The General Services Administration (GSA) maintains a System for Award Management Exclusions (SAM Exclusions) to determine whether a person is excluded. When a federal agency takes an action to exclude a person under the procurement or non-procurement debarment and suspension system, the agency enters the information about the excluded person into the SAM Exclusions.

Definitions

- Suspension – An action taken by a suspending official that immediately prohibits a person from participating in covered transactions and transactions covered under the Federal Acquisition Regulation for a temporary period, pending completion of an agency investigation and any judicial or administrative proceedings that may ensue. A person so excluded is suspended.
- Debarment – An action taken by a debarring official to exclude a person from participating in covered transactions and transactions covered under the Federal Acquisition Regulation. A person so excluded is debarred.
- Procurement Transaction – All functions that pertain to the obtaining of any goods, services, or construction, including description of requirements, selection and solicitation of sources, preparation and award of contract, and all phases of contract administration.
- Non-Procurement Transaction – Any transaction, regardless of type (except procurement contracts), including, but not limited to the following:
    - Grants
    - Cooperative agreements
    - Scholarships
    - Fellowships
    - Contracts of assistance
    - Loans
    - Loan guarantees
    - Subsidies
    - Insurances
    - Payments for specified uses
    - Donation agreements

Covered Transactions

A covered transaction is a non-procurement or procurement transaction that is expected to equal or exceed $25,000 (cumulative) during the budget period. This includes contracted tutors.

Suspension and Debarment Check
The process for checking suspension and debarment may be from one of the acceptable methods:

- SAMS website: Include verification for suspension and debarment with a date/time stamped print screen (requires a SAMS user account) or a signed and dated copy of the screen, person responsible for checking, and query criteria.
- Collecting a certification from the vendor/person to ensure they have not been suspended or debarred.
- Adding a clause or condition to the covered transactions with that vendor/person ensuring that they have not been suspended or debarred.

Items purchased with Title I, Part A, Title I, Part D, Title II, Part A, Title IV, Part A, Title V, Part B and Title IX, Part A are checked by the Federal Programs Administrative Assistant. This check is done prior to entering into a purchase or contract. The search results are only pulled one time during the school year.

The district is only required to check SAMS one time during the year to determine if a vendor is suspended or debarred. If a vendor becomes suspended or debarred after checking SAM, the district may choose to continue to use the vendor if the district was using the vendor prior to the vendor exclusion (2 CFR 180.315). However, the district may choose to terminate services and may not renew or extend covered transactions.

For sealed bids, the district must check SAM twice:
- After opening of bids or receipt of proposals.
- Immediately prior to awarding the vendor.

Documentation

The grant administrator houses the suspension and debarment checks for his/her grant(s).

The Federal Programs Administrative Assistant maintains a copy of the suspension and debarment search results in a file as well as includes individual suspension and debarment searches with each purchasing packet or contract packet.

Exclusions

Any employee of the school system may not enter into a procurement or non-procurement transaction with a vendor listed as suspended or debarred on SAM.

TRANSFERABILITY PROCEDURES (ESEA Section 5102)

Procedures for the process of receiving funds from Title II or Title IV that include the following information.

- Indicate in the CLIP the funds have been transferred to Title I
- Sending program budget is completed and approved
- Title I budget is adjusted for 1% PFE, Private School Proportionate Share, and Indirect Cost
- Title I Director in collaboration with the finance department and sending program review expenditures to determine which ones would be coded for Title I or the sending programs
- Drawdown for the sending program is completed in the DE0147 for that program
- Title I drawdown is completed in the DE0147 for Title I
- Completion Report: The actual expenditures for both Title I and Title II or Title IV (the transferred-in amount) will be reported on the Title I completion report by function and object. Since the transfer-in amount was combined with the Title I itemized budget, the expenditures for both programs will be reported on Title I.

RESOURCE ALLOCATION METHODOLOGY/PLAN (RAM/P) PROCEDURE (ESSA Section 1118)

A districtwide resource allocation plan is based on student characteristics such as poverty, limited English proficiency, or disability, and other factors as is allowed through the section 1120A(c) of the Every Student Succeeds Act of 1965 (ESSA) which provides that a district may receive Title I, Part A funds only if it uses state and local funds to provide services in Title I schools that, taken as a whole, are at least comparable to the services provided in schools that are not receiving Title I funds. The Troup County School System has an obligation to provide documentation that all of the resources available to the district are provided in an equitable manner to all of the schools in the district.

Resource Allocation Methodology/Plan (RAM/P) Development

The RAM/P is developed by the Chief Financial Officer or designee in coordination with the Director of Federal Programs. The RAM/P details how the district equitably distributes state and local funds and resources to each of its schools before allocating funds. The district must provide funds to Title I schools on the same basis as it provides funds to non-Title I schools, subject to application of the "exclusion" provision. This includes funds needed to provide services that are required by law.

The district includes in the RAM/P

- Personnel Staffing Allocations

- Instructional Personnel Allocations
    - An instructional allocation ratio per full-time equivalent (FTE) plus an economically disadvantaged factor is used for each grade band
    - Exceptional Education teacher allotments are based on maximum class sizes (Students with Disabilities of State Board Rule 160-5-1-.08 Class Size and State Board Rule 160-4-7-.14 Personnel, Facilities and Caseloads)
    - ESOL teacher allotments are based on maximum class sizes (English to Speakers of Other Languages (ESOL) of State Board Rule 160-5-1-.08 Class Size)
    - Instructional paraprofessionals are based on an allocation ratio for each grade band
- Other Staff Allocations
    - School administration is based on an allocation ratio for each grade band
    - School leadership mentoring is provided to support any school with 100% new administrative staff
    - Other support personnel is based on an allocation ratio for each grade band
    - Program staff is based on an allocation ratio by program
- School-based Operating Allocations
    - Flat allocations are provided per FTE for basis operations
- SPLOST Operation Allocations
    - Technology devices are based on student enrollment ratios for each grade band

Monitoring the Resource Allocation Methodology/Plan

The Chief Financial Officer or designee monitor the implementation of the RAM/P to ensure that each school does not exceed their individual allocations. The RAM/P is monitored based on:

- Staff allotments
- Staff hires and transfers
- School-based allocations
- District purchases for schools

EQUIPMENT MANAGEMENT 2 CFR Sec. 200.313(d))

Functions of an Inventory

- Serves as a needs determination in deciding if additional materials and supplies need to be purchased in order to implement the district's educational programs.
- Surveys the property in storage to determine if it is being:
    - Held for disposition
    - Disposed (in the process)
    - Consumed/utilized in the implementation of the district's federal programs

- Provides an inventory disposition process for the loaning and issuing of equipment, as well as the disposal process.
- Provides policies and standard procedures for program planning and monitoring of equipment use.

Definitions

- Equipment:
  - Nonexpendable, tangible personal property having a useful life of more than one year (Ex: Chromebooks, desktop computers, laptops, projectors).
- Supplies:
  - All tangible personal property other than equipment (Ex: books, paper, and manipulatives purchased with federal funds).
  - Generally considered consumable items.
- Pilferable Items:
  - Walkable items. Those items that may be easily lost or stolen (Ex: Chromebooks, tablets, calculators, projectors, cameras, camcorders, DVD players, laptops, televisions).

Control System

These procedures implement adequate safeguards and maintenance procedures. Such internal controls provide reasonable assurance of the effectiveness and efficiency of the program, reliability of reporting, and compliance with applicable laws and regulations.
The district shall provide effective control over and accountability for all funds, property, and other assets. The monitoring includes the purchasing, use, and disposal of property. The district must ensure that equipment is used solely for the authorized purpose. The district wide inventory control system accounts for all equipment purchased with federal dollars.

Inventory is maintained at the school level by the designee selected by the principal. Inventory is documented in a database that is updated each time equipment is purchased. All federally-funded property over $5,000 is identified by permanent markings on the equipment that signify the school, the program and the fiscal year the equipment was purchased. (For example: BWES, Title I, FY16) The Federal Programs Office staff will add labels to new items when they conduct the physical inventories in the buildings. The inventory spreadsheets include the school/facility, asset description, location, serial number, model number, vendor, purchase order number, cost, purchase date, fund code, FAIN (Federal Award Identification Number), use, condition and asset tag. School personnel must annually verify the location and condition of the equipment. Each item must be checked/noted on the inventory record specifically for condition and location. Principals attest that the equipment is as identified on the inventory record submitted to the grant administrator. Technology personnel help determine the condition of equipment. When a piece of equipment needs to be disposed of, disposal forms are completed and kept on file and a disposal log is maintained in the district Federal Programs Office. Disposal occurs according to the Troup County School System Disposal Policy. Additionally, equipment procedures and allowability rules for assignment and placement are addressed with school staff annually during summer (July) meetings.

PROCEDURES

2 C.F.R. Sec. 200.62(c); 2 C.F.R. Sec. 200.313(a)-(e); GEPA Sec. 443(a)

Acquisition of Equipment

The district must develop and maintain controls to ensure that all property purchased with federal funds is obtained in accordance with the district's procurement procedures and that adequate controls are maintained to safeguard all equipment purchased. Equipment may currently be purchased with IDEA—Exceptional Education, Title I, Part A, Title I, Part A Neglected and Delinquent, School Improvement 1003(a), Title II, Part A, Title III, Part A, Title IV, Part A and Title V, Part B. However, the grant administrator must determine if:

- Equipment is reasonable and necessary to effectively operate its programs
- Existing equipment will not be sufficient
- Costs are necessary, reasonable, allocable, and allowable
- Purchases are in accordance with the regulations of the funding source

All equipment purchases must be signed off by the grant administrator to ensure that purchases are allowable, supplemental, and consistent with academic needs.

Grant	Grant Administrator
IDEA – Exceptional Education	Executive Director of Exceptional Education & Support Services
Title I, Part A	Director of Federal Programs
Title I, Part A Neglected and Delinquent	Director of Federal Programs
Title II, Part A	Director of Federal Programs
Title III, Part A	Executive Director of Exceptional Education & Support Services
Title IV, Part A	Director of Federal Programs
Title V, Part B	Director of Federal Programs
School Improvement 1003(a)	Director of Federal Programs

Technology purchases are determined and approved through the district/school improvement planning process. The school determines the use of the equipment. The requisition for purchase of equipment follows the district's internal control procedures.

When technology quotes are received, the federal programs administrative assistant submits the requisition. Once the requisition is approved by the federal programs director, a copy is forwarded to the technology department to be ordered and delivered to the requesting facility. Once items are received throughout the school year, the federal programs administrative assistant receives all serial numbers from the technology department. The administrative assistant adds the serial number, description, cost, source of funding, FAIN, date of purchase, vendor, location, use and condition of property to the inventory spreadsheets. A separate disposal log is maintained annually for all items that are disposed. The items are removed from the schools' spreadsheets and listed on the disposal log.

The TCSS does not allow off-site use of equipment purchase through federal funds.

The TCSS does not utilize an inventory software. The federal programs administrative assistant records all

inventory information into Excel spreadsheets.

Newly purchased items must be labeled by the school before they can be distributed for use in the school/department. The label must include the school name, the fiscal year of purchase and program name (ex. BWES, FY26, Title I).

Chromebooks

To label the cart: (School Name, Title I- FY __, and Cart #1, #2, etc.)
To label each Chromebook in the cart:

School Name
Title I- FY __
Cart #1
Slot #1 (etc.)

Using a label and placing it on the back of the Chromebook works well and saves time.

It is suggested that the key to Chromebook carts not be kept in the cart. Keeping the key in a separate location will be an added security measure for each Chromebook.

Georgia Professional Standards Commission Code of Ethics:

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

1. misusing public or school-related funds;
2. failing to account for funds collected from students or parents;
3. submitting fraudulent requests for reimbursement of expenses or for pay;
4. co-mingling public or school-related funds with personal funds or checking accounts; and
5. using school property without the approval of the local board of education/governing board.

Inventory Records

Maintenance of property records and documentation is retained until equipment is disposed of or transferred to another federal program. Records for real property and equipment acquired with federal funds are retained for at least five years after transfer or final disposition. After five years from transfer or final disposition, items will be deleted from the current copy of the inventory log.

Grant	Person Responsible for Inventory Management and Maintaining Inventory Documentation
IDEA – Exceptional Education	Exceptional Education Department/Principal and/or Designee
Title I, Part A	Federal Programs Department Staff/Principal and/or Designee
Title I, Part A Neglected and Delinquent	Federal Programs Department Staff/Principal and/or Designee
Title II, Part A	Federal Programs Department Staff/Principal and/or Designee
Title III, Part A	Exceptional Education Department/Principal and/or Designee
Title IV, Part A	Federal Programs Department Staff/Principal and/or Designee

Title V, Part B	Federal Programs Department Staff/Principal and/or Designee
Title V, Part B	Federal Programs Department Staff/Principal and/or Designee
School Improvement 1003(a)	Federal Programs Department Staff / Principal and/or Designee

Physical Inventories

The grant department staff will conduct the inventory of federally-funded equipment every other year in buildings. However, inventory is still conducted annually in the off years by the principal or other designee. The purpose of physical inventories is to verify:

- The existence of equipment
- Current utilization of equipment
- The continued need of equipment
- The condition of the equipment

Even years (FY 24, FY 26, FY 28, etc.): Federal Programs Office staff will inventory the following 7 schools- Clearview Elementary, Franklin Forest Elementary, Hogansville Elementary, Hollis Hand Elementary, Long Cane Elementary, Rosemont Elementary. During even years, other schools/sites will conduct their own inventory and turn in signed/dated inventory forms to the Federal Programs Office by the end of December.

Odd years (FY 23, FY 25, FY 27, etc.): Federal Programs Office staff will inventory the following 4 schools- Berta Weathersbee Elementary, Callaway Elementary, Ethel W. Kight Elementary, Hillcrest Elementary, West Point Elementary. During odd years, the other schools/sites will conduct their own inventory and turn in signed/dated inventory forms to the Federal Programs Office by the end of December.

Every year: Federal Programs Office staff will inventory the following sites - Ault Academy, Connections and Pineland (Neglected facilities), Callaway Middle School, HOPE Academy and ASC (Administrative Services Center). In addition, all other secondary schools.

Preparing for Inventory Checks

School principals and/or designee should take the following steps when preparing for inventory visits:

- Ensure that the locations on the inventory log are accurate
- Provide a map with room numbers/names where equipment is located in the school/department at any given time
- Update notes about any equipment that appears to be damaged or in need of repairs as soon as they are known.
- Notify staff of inventory dates to minimize interruptions to instructional time.

The Federal Programs Administrative Assistant updates inventory spreadsheets after physical inventories are completed. Follow up is handled as needed for missing items. Necessary forms are completed and filed with inventory documents (Disposal of Inventory, Report of Lost or Stolen Property)

Disposal of Inventory/Form: This form must be filled out when any equipment is disposed of in buildings. The school keeps a copy of the form with its inventory paperwork and forwards the original form to the Federal Programs Office. Directions stated on form should be followed. More information on disposal of inventory is

listed below. Inventory may be disposed if it is no longer used, if it is damaged, if it is obsolete, or if it is surplus. A disposal log is maintained in the district Federal Programs Office.

Lost or Stolen Inventory/Form: As federally-funded inventory items are reported lost or stolen, this form must be filed out. The school keeps a copy of the form with its inventory paperwork and forwards the original form to the Federal Programs Office. If an item of equipment has been damaged, destroyed, lost, or stolen, an official investigation by the proper authorities should be conducted and fully documented. A copy of this report must be kept on file in the district Federal Programs Office and the school's administrative office, usually the principal's office.

Principals'/designees sign and date inventory of federally-funded equipment. The grant administrator/designee signs and dates inventory of federally-funded equipment housed in the Administrative Services Center.

Equipment Timeline

- **July**
  - Administrative meeting - review inventory procedures
  - The Federal Programs Administrative Assistant updates the inventory for the upcoming school year
- **August-November**
  - Physical inventories conducted for all items listed on the schools' or departments' inventory logs

Use of Equipment

Use of equipment is for authorized purposes of the property during the period of performance, or until the property is no longer needed for the purposes of the project. Equipment must be used by the district in the program or project for which it was acquired as long as needed. When no longer needed for the original program or project, the equipment may be used in other activities supported by the Federal awarding agency. First preference for other use must be given to other programs or projects supported by the Federal awarding agency. Second preference must be given to programs or projects under Federal awards from other Federal awarding agencies.

Grant	Allowable Use
IDEA – Exceptional Education	Allowable initiatives to support students with disabilities and Exceptional Education staff
Title I, Part A	Allowable initiatives identified in the School/System Comprehensive Needs Assessment (CNA) and action steps listed in the School/System Improvement Plan (SIP/CSIP) that result in increased student achievement
Title I, Part A Neglected and Delinquent	Allowable initiatives identified in the School/System Comprehensive Needs Assessment (CNA) and action steps listed in the School/System Improvement Plan (SIP/CSIP) that result in increased student achievement
Title II, Part A	Allowable initiatives identified in the School/System Comprehensive Needs Assessment (CNA) and action steps listed in the School/System Improvement Plan (SIP/CSIP) that result in improved quality and effectiveness of teachers, principals, and other school leaders
Title III, Part A	Allowable initiatives to support English Learner second language acquisition

Title IV, Part A	Allowable initiatives identified in the School/System Comprehensive Needs Assessment (CNA) and action steps listed in the School/System Improvement Plan (SIP/CSIP) that result in increased student achievement and access to a well-rounded education
Title V, Part B	Allowable initiatives identified in the School/System Comprehensive Needs Assessment (CNA) and action steps listed in the School/System Improvement Plan (SIP/CSIP) that result in increased student achievement
School Improvement 1003(a)	Allowable initiatives to address areas identified in the School Improvement Plan (SIP) for Comprehensive Support and Improvement (CSI) or Targeted Support and Improvement (TSI) schools

Use of Equipment in Private Schools (if Applicable)

Private schools will be provided an updated Inventory list annually. Although the equipment may be used by the private school, the TCSS retains the title and will account for the equipment in its inventory.

Capital Outlay Purchases

The Troup County School System has not made capital outlay purchases using IDEA—Exceptional Education, Title I, Part A, Title III, Part A, Title IV, Part A, or School Improvement 1003(a), funds. If capital outlay purchases are made in the future, they will be made with the approved federal grant's budget/budget amendment (Object Code 700). They will be pre-approved by the Georgia Department of Education prior to being included in the budget. The system will receive approval for the disposition of capital outlay equipment.

The district/school shall retain such property in a program as long as there is need for such property to accomplish the purpose of the program for which it was purchased. The district/school may transfer title of the property to the Federal Government or to an eligible third party provided that, in such cases, the district/school must be entitled to compensation for its attributable market percentage of the current fair market value of the property.

Equipment with a per unit fair market value in excess of $5,000 may be retained by the non-federal entity or sold. The federal awarding agency is entitled to an amount calculated by multiplying the current fair market value or proceeds from sale by the Federal awarding agency's percentage of participation in the cost of the original purchase. If the equipment is sold, the federal awarding agency may permit the non-federal entity to deduct and retain from the federal share $500 or ten percent of the proceeds, whichever is less, for its selling and handling expenses. Currently, the GaDOE does not require this action from the district.

Process for Sale of Equipment – (If Applicable)

Equipment purchased with federal grants cannot be sold as surplus without approval from the grant administrator. The grant administrator will determine on a case-by-case basis if disposed, usable equipment will be sold as surplus based on the projected fair market value of the items and the demand for them. Items will be priced no lower than the fair market value to ensure the highest possible return. Current fair market value is determined by obtaining two signed bids

from potential purchasers or two appraisals from authorized appraisers for the purpose of disposing of or transferring equipment.

Surplus equipment is defined as "functional equipment that is at least 5 years old, is incompatible with the district's current network, is unable to be updated to the district's current Operating System (OS), and/or is no longer usable to support instruction or professional development." The process for the sale of equipment purchased with federal grants involves the following:

- A list of the equipment with all inventory log fields present should be sent to the grant equipment contact by the school/department equipment contact.
- The list will be approved/unapproved by the grant administrator based on the established criteria.
- The grant administrator will complete a BOE Action Memo detailing that the items will be sold as surplus.
- After BOE approval, items will be priced at fair market value and sold by the grant department. Equipment will be located at the maintenance warehouse and sold in coordination with the Maintenance Department.
- Funds received from equipment sold as surplus will be returned to the school's/department's originating grant account. The amount of the sale will be noted on the inventory log as well as the program being reimbursed.

A school/department may not conduct a sale of equipment purchased by federal grants at any time. All equipment sales will be coordinated by the grant administrator.

Disposal of Equipment

Equipment with an acquisition cost of less than $5,000, which is at least 5 years old and no longer effective will be purged or transferred to the technology department. This includes schools that have closed. Such equipment can be retained or disposed with no further obligation to the federal awarding agency. A device may be removed if it is out of warranty with the manufacturer and is being disposed of due to an established product defect. Equipment that is unusable within the district due to network incompatibilities, unsupported hardware specifications or outdated operating systems may be disposed. Disposal of equipment decisions are made jointly between the federal program department and the technology department. Disposal forms are kept on file along with an annual disposal log.

Transfer of Equipment

Equipment is to be used for the authorized purposes of the project until funding for the project ceases, or until the property is no longer needed for the purposes of the project. Transfer can occur at the close of the federal program/school if equipment is no longer needed for its original intent. It may be transferred to the same program in another school if needed.

The grant department will assess the equipment's condition prior to transfer from the original school/department to ensure that it is working properly and undamaged. Removed equipment will be retained and secured within the grant department's office until an allowable school/department or program is determined for equipment transfer. Inventory list will be updated by the grant department's administrative assistant.

Safeguards Against Loss from Unauthorized Use or Disposition

The TCSS shall provide an effective control system and accountability for all funds, property and other assets. The TCSS shall adequately safeguard all assets and ensure they are used

solely for authorized purposes.

Conducting a physical inventory ensures that equipment is being used as intended thus protecting against unauthorized use. During physical inventory appointments, the grant equipment contact ensures that items are assigned and located in allowable areas. Any un-authorized use or placement are addressed during the physical inventory appointment.

Additionally, equipment procedures and allowability rules for assignment and placement are addressed with school staff annually during summer (July) meetings.

Lost, Damaged, or Stolen Equipment

It is the school/department's responsibility to ensure that the equipment is accounted for and kept in good-working condition. Any differences between quantities determined by the physical inspection and those shown in the accounting records will be investigated to determine the causes of the difference. Equipment that is damaged, lost, or stolen must be reported to the grant department's administrative assistant within 5 days of the incident**.** Adequate safeguards to prevent loss, damage, or theft of the equipment should be put in place by each school/department. These may include:

- Locks
- Security cameras
- Use of the media center's check-out system

The grant department's administrative assistant reviews form submissions in coordination with the grant administrator to determine whether lost, damaged, or stolen equipment requires disposition, replacement, repair, or if no action is required due to the age of equipment or circumstances of the loss. The grant equipment contact generates summarized paperwork for the school/department administrator detailing the loss, damage, or theft of the equipment and what actions are required. The summarized information allows the school/department administrator to investigate the situation if loss, damage, or theft occur to determine who is responsible for any associated payment.

Maintenance Procedures

The TCSS adheres to the following maintenance procedures to ensure that equipment is kept in good condition:

- Equipment is maintained on the inventory log as long as it is needed for the purposes of the project/program
- Records for real property and equipment acquired with federal funds are maintained on the inventory disposition log for at least 5 years

While equipment is included on the inventory spreadsheet, the technology department is responsible for maintaining the equipment and keeping it in good condition. The technology department provides regular maintenance and updates and repairs broken equipment for all system computers. Staff members districtwide have access to the "SchoolDude" ticketing software to request technology assistance.

CASH MANAGEMENT AND DRAWDOWNS (Sec. 200.302(b)(6); Sec. 2 CFR 200.305)

The district must establish procedures that provide internal controls to:

- Segregate duties associated with cash management,
- Monitor cash management activities (including reconciliations), and
- Ensure reimbursements are made only after costs have been incurred or cash advances are made as close as is administratively possible to actual cash outlays.

The Troup County School System (TCSS) must minimize the time elapsing between the transfer of funds from the GaDOE and the disbursement by the district. The TCSS will drawdown federal funds on a reimbursement basis for all allowable expenditures incurred in their respective participating federal programs.

TCSS follows drawdown procedures to ensure that:

- Reimbursements are only made after costs have been incurred,
- Drawdown requests are only for immediate need,
- The grant administrator ensures reconciliation of the budget to expenditures,
- The grant administrator authorizes the drawdown request, and
- Funds are not drawn down before actual need.

Monthly Drawdowns

The Chief Financial Officer will request monthly drawdowns (DE0147) in the GAORS system electronically. The TCSS will request the amount to be reimbursed and upon approval from Grants Accounting will receive their money. The cut off for monthly drawdowns is the 10th working day of each month. The district is limited to one drawdown per month (15 payments for federal grants) during the grant period.

On the DE0147 drawdown forms, the Chief Financial Officer agrees to the following:

- By signing this report, I certify to the best of my knowledge and belief that the report is true, complete, and accurate, and the expenditures, disbursements, and cash receipts are for the purposes and objectives set forth in the terms and conditions of the federal award. I am aware that any false, fictitious, or fraudulent information, or the omission of any material fact, may subject me to criminal, civil, or administrative penalties for fraud, false statements, false claims or otherwise. (U.S. Code Title 18, Sec. 1001 and Title 31, Secs. 3729-3730 and 3801-3812).

Expenditure Requirements

The following chart defines the specific actions taken by each federal program to monitor the appropriate and timely drawdown of funds throughout the fiscal year.

Grant	Expenditure Guidelines	Expenditure Requirement
Title I, Part A – Improving the Academic Achievement of the Disadvantaged	• October 31 = 27% • November 30 = 33% • December 31 = 40% • January 31 = 47% • February 28 = 53% • March 31 = 60% • April 30 = 67% • May 31 = 73% • June 30 = 80% • July 31 = 87% • August 31 = 93% • September 30 = 100%	85% of Allocation and 100% of Carryover
Title I, Part D – Neglected and Delinquent	“ ”	85% of Allocation and 100% of Carryover
Title II, Part A – Improving Teacher Quality	“ ”	85% of Allocation and 100% of Carryover
Title III, Part A – Language Instruction for English Learners (EL)	“ ”	85% of Allocation and 100% of Carryover
Title IV, Part A – Student Support and Academic Enrichment (SSAE)	“ ”	85% of Allocation and 100% of Carryover
Title V, Part B – Rural and Low Income Schools	“ ”	85% of Allocation and 100% of Carryover
School Improvement Grant 1003 (a)	• December 31 = 35% • March 31 = 50% • May 31 = 70% • September 30 = 100%	100% of Allocation
IDEA	• December 31 = 25% • April 30 = 50% • September 30 = 75% or more	75% of Allocation
GNETS	NA	75% of Allocation

Additionally, the GaDOE monitors the drawdown of funds to ensure that the district is fully and appropriately drawing down available federal grant funds throughout the period of availability.

Grant Drawdown Procedures

- Grant drawdowns will be done each month to reimburse grant expenses incurred during the month the drawdown is being claimed.
- These drawdowns will occur once funds are made available in the GAORS system. Until funds are available, the Troup County School System will forward the funds for the grants to be reimbursed at a later date.
- The Chief Financial Officer or designee will use the accounting software to submit to the appropriate federal grant administrator the detail and total of the month's expenses in the grant to obtain approval to make the drawdown. Authorization approval for drawdowns is as follows:

    - IDEA – Executive Director of Exceptional Education & Support Services
    - GNETS – Director of GNETS
    - Title I, Part A – Director of Federal Programs
    - Title I, Part D – Director of Federal Programs
    - School Improvement 1003(a) – Director of Federal Programs
    - Title II, Part A – Director of Federal Programs
    - Title III, Part A – Executive Director of Exceptional Education & Support Services
    - Title IV, Part A – Director of Federal Programs
    - Title V, Part B – Director of Federal Programs
    - Title IX, Part A – Director of Federal Programs

- Upon approval, the drawdown will be submitted into the GAORS system by the Chief Financial Officer or designee.
- Federal expenses will be reimbursed based on actual expenses charged to the funds' respective fund codes until a budget is approved by GaDOE and appropriate percentages are obtained. The total drawdowns of federal funds will be the same as if split using a percentage. Once a schoolwide budget is approved, the percentages will be applied and an adjustment in the drawdown for each fund contributing to the schoolwide fund will be made in the latest month's drawdown. Throughout this process, total cash drawn down between all federal funds will be what was actually spent during the month of the drawdown.
- If software or account coding errors are found and need a reclassification by the Chief Financial Officer, the appropriate journal entry will be reflected in the latest month with the effect captured in the subsequent drawdown.
- In the event of a personnel reclassification that goes back to prior month payroll checks, the total difference in expense will be subtracted or added to the latest month's drawdown.

Monthly Grant Review/Reconciliation Procedure

Every month, each grant administrator reviews expenditures for any needed corrections. This process is as follows:

- The Accounting Coordinator pulls a general ledger report for the month and budget analysis report and sends to the grant departments.
- The grant coordinator and administrative assistant review the report expenditures for accuracy and alignment with the approved federal grant budget (reconciliation). The grant coordinator and administrative assistant notate any discrepancies.
- The grant administrator, administrative assistant and accounting coordinator meet to discuss corrections that are needed.
- The grant administrator signs and dates the reports.
- The Chief Financial Officer or designee will make any corrections prior to completing the drawdown.

Maintenance of Documentation

The Chief Financial Officer or designee maintains the following documentation:

- Supporting operations reports
- General ledgers and budget analysis reports reviewed by the grant administrator indicating any corrections needed

TITLE I, PART A – WITHIN DISTRICT ALLOCATION PROCEDURES

The purpose of Title I, Part A is to provide all children significant opportunity to receive a fair, equitable, and high-quality education, and to close educational achievement gaps (Sec. 1001)

General Selection Requirements

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

- An LEA must use the same measure of poverty for:
    - Identifying eligible school attendance areas.
    - Determining the ranking of each area.
    - Determining the allocation for each area.

- The LEA must select a poverty measure from the following options:
- Children ages 5 to 17 in poverty as counted in the most recent census data approved by the secretary.
- Children eligible for free or reduced meals (FRM) under the Richard B. Russell National School Lunch Act.
- Children in families receiving assistance under the state program funded under Title IV

of the Social Security Act Temporary Assistance for Needy Families (TANF).

- Children eligible to receive medical assistance under the Medicaid program.
- A composite of any of the above measures.

- Identified students under Community Eligibility Provision (CEP) are eligible under the Richard B. Russell National School Lunch Program (NSLP). If the LEA selects NSLP data as its poverty measure (or uses the data in a composite) and has a CEP school, the CEP data will be part of the NSLP data that the LEA uses for within district allocation.

- An LEA must rank school attendance areas based on the percentage (not the number) of low-income children counted and without regard to grade spans.

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

- EXCEPTION—An LEA may choose to lower the 75-percent poverty threshold to 50-percent for high schools.

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

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

- An LEA's organization of its schools defines its grade-span groupings. For example, if an LEA has elementary schools serving all elementary grades, middle schools, and high schools, the grade-span groupings would be grades K to 5, 6 to 8, 9 to 12. To the extent that an LEA has schools that overlap grade spans (e.g., K to 5, K to 8, 6 to 12), the LEA should include a school in the grade span in which there are the greatest number of grades represented. For example, a K-8 school would be included with other elementary schools…because this K-8 school has more elementary grades (5) than middle school grades (3).

LEA Discretion in Selecting Participating Areas and Schools

An LEA may:

- Designate as eligible any school attendance area or school in which at least 35- percent of the children are from low-income families; i.e., the 35-percent rule. Keep in mind that to be a Schoolwide School, the poverty level must be 40% or above or the school must have an approved Title I Schoolwide waiver (See Section: "Using Title I Schoolwide Programs to Support School Reform" for more information on the Title I Schoolwide waiver).
- Use Title I, Part A funds in a school that does not serve an eligible school attendance area if the percentage of children from low-income families enrolled in the school is equal to or greater than the percentage of such children in a participating school attendance area of the LEA.

- For one additional year only, designate and serve a school attendance area or school that is no longer eligible but was eligible and served in the preceding year. When using this option, an LEA must meet the requirement to serve schools in rank order. This is commonly known as the Grandfather Clause.
- Elect not to serve an eligible school attendance area or eligible school that has a higher percentage of children from low-income families if—

i. the school meets the comparability requirements of section 1118(c);
ii. the school is receiving supplemental funds from other State or local sources that are spent according to the requirements of section 1114 or 1115; and
iii. the funds expended from such other sources equal or exceed the amount that would be provided under this part.

The TCSS serves all elementary schools using grade span grouping K-5 and schools with attendance areas over 75-percent poverty. There are currently 13 Title I schools in the Troup County School System. The eligible attendance area worksheet is completed using Direct Certified numbers/percentages since all schools are Community Eligibility Provision (CEP).

CALCULATION OF FUNDS FOR REQUIRED SET-ASIDES (ESSA: Sec. 1113; 34 CFR Sec. 200.70; 200.71)

The Troup County School System (TCSS) must reserve funds to provide comparable services to those services provided to children in funded schools including:

- Homeless children
- Foster children
- Children in local institutions for neglected children
- Children in local institutions for delinquent children (if applicable)

To ensure that the set-asides are calculated correctly, the TCSS follows the procedures below for calculating the required district set-asides.

Calculation of the Parent and Family Engagement Set-Aside:

For systems with a Title I, Part A allocation greater than $500,000, at least one percent of the allocation must be set-aside for parent engagement. The parent and family engagement set-aside is calculated by multiplying the total Title I, Part A allocation by one percent.

Ninety percent of the one percent reserved must be distributed directly to Title I schools with priority given to high needs schools. The remaining ten percent is used for district level parent and family engagement activities. Parent and family engagement funds distributed to Title I schools from the district set-aside are not consolidated in the Schoolwide Consolidation of Funds (Fund 400).

Additionally, the TCSS sets aside an additional allocation for parent and family engagement. This additional allocation plus the ninety percent of the one percent allocation make up the total school allocation. A small additional amount of parent engagement is given to each school to ensure that the one percent allocation will be fully expended.

Title I, Part A
Districtwide Parent Activity-Project Assurance

To comply with federal guidelines, districts that receive an allocation of more than $500,000 must reserve 1 percent of their total allocation. Ninety percent (90%) of the 1 percent must be allocated directly to participating Title I schools.

An exception may be made to this provision if participating Title I principals agree to pool all or part of their parent involvement allocation for a district-level parent involvement activity/project. Districts with schools exercising this flexibility must provide supporting documentation on the Attachments Tab of the Consolidated Application budget.
The following Title I principals have agreed without coercion to pool all or part of their parent involvement allocation for a district-level parent involvement activity/project.

Title I School	Title I Principal	Signature of Title I Principal	Amount Toward Districtwide Activity/Project

Director of Federal Programs Signature _____ Date _____

<u>Calculation of the Homeless Set-Aside</u>:

The district must reserve funds necessary to provide comparable services to homeless children. The TCSS must use one of the following four methods to calculate the homeless set-aside:

1. Identify homeless student needs and fund accordingly
2. Obtain a count of homeless students and multiply by the district's Title I, Part A per-pupil allocation
3. Reserve an amount greater than or equal to the district's McKinney-Vento sub grant request
4. Reserve a specific percentage of the district's poverty level or its Title I, Part A allocation

Set-aside funds may be used to assist homeless students in all TCSS schools. A homeless set-aside is required even if all schools in the district are Title I, Part A schools.

Prior to determining the method annually, the Director of Federal Programs and the Coordinator of Student Assignment (Homeless Liaison) meet to determine the appropriate amount needed to support the needs of homeless students. In determining appropriate expenditures for the set-aside for homeless students, it is important to note that comparable services may not necessarily mean services that are identical to the services provided to non-homeless students (i.e. uniforms, expedited evaluations, eye glasses, transportation). The district has the discretion to use set-aside

funds to provide homeless students with services that are not ordinarily provided to other Title I students and that are not available from other sources.

Calculation of the Neglected and Delinquent Set-Aside:

The TCSS uses the annual set-aside amount calculated by the GaDOE for neglected and delinquent institutions. The amount of the set-aside must be equal to or greater than the amount listed on the GaDOE allocation sheet. The allocation is based on the annual neglected and delinquent survey from the previous year.

Troup County currently has two neglected facilities (Georgia Sheriffs' Youth Home/Pineland and Twin Cedars Youth and Family Services, Inc. Connections). If there are no students placed in the home during the school year, funds may be used for students in the district who are identified as at-risk youth including:

- Children and youth who have been adjudicated within the juvenile justice system but have returned to a school operated by the school district (using the best available records and data available to identify these individuals)
- Migrant children or youth (based on their eligibility for services under Title I, Part C of ESSA)
- Immigrant children or youth
- Gang members (based on definitions established by the SEA or district)
- Pregnant and parenting youth through the age of 21
- Children who are at-risk of school failure or who have failed before
- Children who have limited English proficiency
- Children who have dropped out of school

Troup County has one delinquent facility, Ault Academy/Bradfield Center of Twin Cedars Youth and Family Services, Inc.

Calculation of the Private School Proportionate Share: (If Applicable)

To calculate the Title I Private School Proportionate Share, the most recent Title I Private School Proportionate Share Calculation Worksheets must be obtained from the State Ombudsman website at http://www.gadoe.org/School-Improvement/Federal-Programs/Pages/State- Ombudsman.aspx.

Information is entered into the header of the worksheet. Some fields are automatically calculated. Information includes the following:

- FY25 Title I Total Allocation
- Federal Funds Transferred into Title I, Part A from Title II, Part A and/or Title IV, Part A
- Total LEA's Title I, Part A Funds Eligible for Equitable Services with Private Schools (automatically calculated)
- Total of Private School Poverty Students Residing in Title I Attendance Zones (Previous Year Agreed Upon Count)
    - The prior year's October FTE day is used as the count day
- LEA's Total Number of Poverty Students in LEA's Title I Schools (using the prior year's October FTE data)
- Total Poverty Count of LEA and Private Schools (automatically calculated)
- % of Private School Poverty to Total Poverty "**Private School Proportionate Share**"

(automatically calculated)

- LEA's Private Schools' Proportionate Set-Aside for Title I Equitable Services W/O Carryover (automatically calculated)
- Prior Year's Private Schools' Carryover Due to Extenuating Circumstances (Approved by Ombudsman) (if applicable)
- LEA's TOTAL Private Schools' Proportionate Set-Aside for Title I Equitable Services (automatically calculated)
- LEA's FY25 Private Schools' Administrative % Agreed Upon with Private Schools (0% - 10%) and Associated Dollar Amount
    - The TCSS does not set-aside costs to administer the private school's proportionate share

In the center of the worksheet, the following fields are entered or automatically calculated:

- Name of Private School
- Number of Private School Poverty Students (Using October count prior to the service year)
- Each Private School's % of Total Number of Private School Poverty Students (automatically calculated)
- Private School's Title I Proportionate Share for Parent & Family Engagement Amount (automatically calculated)
- Private School's Title I Proportionate Share of LEA's Administrative Cost (automatically calculated)
- Private School's Title I Proportionate Share for Instruction and Professional Development (automatically calculated)
- Prior Year's "Individual" Private School's Carryover Approved by Ombudsman (if applicable)
- Total Amount for Each Private School's Title I Equitable Services (automatically calculated)

The total amount for each private school's Title I, Part A equitable services is used as the private school's total allocation. The proportionate amount for parent and family engagement as well as instruction and professional development are used for the identified categories. These two proportions make up the entire private school amount since TCSS does not set-aside administrative costs.

CALCULATION OF PARENT ENGAGEMENT CARRYOVER FUNDS

For systems with a Title I, Part A allocation greater than $500,000, at least one percent of the allocation must be set-aside and expended for parent engagement. The Troup County School System will annually determine the amount of parent engagement carryover.

Calculation of Parent and Family Engagement Carryover:

A journal summary operations report is run for the previous school year based on the following criteria:

- Fund code: 402
- Function code: 2100

Additionally, an expenditure detail report (journal summary operations report) is run for the interim period of July through September if funds for parent engagement were expended during that time. This amount may be pending depending on when the initial Title I, Part A budget is submitted.

In a district-created worksheet, the Director of Federal Programs enters the following information:

- Previous year's Title I, Part A initial allocation
- Previous year's parent engagement 1% set-aside
- Previous year's parent engagement expenditures during the year (July through June)
- Previous year's parent engagement expenditures for the interim period (July through September) if applicable

A sample calculation is shown below:

FY19 Parent and Family Engagement Carryover Worksheet		
FY19 Title I Allocation	$3,663,671.00	
FY19 Parent Engagement 1% Set-Aside	$36,637.00	
FY19 Parent Engagement Expenditures	$131,291	
FY19 Parent Engagement Interim Expenditures		**Pending**
FY19 Total Parent Engagement Expenditures	$131,291	
FY19 Carryover	**$0.00**	

If the parent engagement expenditures plus the parent engagement interim expenditures are greater than the one percent required set-aside, parent engagement carryover will be zero dollars for the current school year. If the expenditures are less than the one percent required set-aside, then the difference of the set-aside minus the expenditures will be listed as carryover for the current school year.

The expenditure detail report and parent and family engagement carryover worksheet will be maintained for documentation purposes.

COLLECTION AND VERIFICATION OF PARTICIPATING PRIVATE SCHOOL POVERTY NUMBERS (ESSA: Sec. 1113; 34 CFR Sec. 200.70; 200.71)

The Troup County School System (TCSS) currently does not serve any private schools in the Title I Program.

The TCSS must reserve funds to provide comparable services for eligible children in participating private schools.

Collection and Verification of Enrollment At the beginning of March prior to the service year, the Federal Programs Administrative Assistant requests enrollment data from the private school for the October full-time equivalent (FTE) count day. The data requested includes last name, first name, grade, and address. The private school is asked to submit the data by the end of March.

The Federal Programs Administrative Assistant reviews the enrollment list and verifies the addresses to determine the number of students residing in Troup County Title I attendance zones on the October FTE count day.

Collection and Verification of Poverty Numbers

The TCSS consults with the private school through meetings, phone and/or email to discuss how poverty information will be collected. The TCSS and the private school agree upon a method for income determination.

For Title I, Part A, income determination is collected for students who attend the private school and reside in Troup County. A deadline for completion is given to the private school (end of March).

The private school contact receives income verification from families residing in Troup County. The information is provided by families with children currently attending the private school. Information includes:

- Family address
- Grade levels of children living in the household and attending the private school
- Income information

Once information is received from all private school students, the private school contact informs the Federal Programs Administrative Assistant. The Federal Programs Administrative Assistant matches the addresses to the enrollment report to ensure information is received from each family to maximize the private school equitable services (if possible) for the October FTE count day.

The information is reviewed by the Director of School Nutrition. The director confirms which families meet the poverty criteria. From this verification, a count of poverty students residing in Title I attendance zones is determined for the private school. This number is used for each applicable private school for the "Number of Private School Poverty Students (Using October Count)" on the GaDOE Private School Proportionate Share Calculation Form.

Data from the private school is used to calculate the private school proportionate share. This form calculates the:

- Amount for family engagement
- Amount reserved for administrative costs for private school equitable services (optional)
- Amount reserved for instructional and professional development services

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

Equity Action Plan

The Troup County School System Equity Action Plan is revised annually and included in the LEA S-CLIP submission.

The LEA Equity Action Plan Template follows these steps:

- Review of LEA Data
- Choosing Equity Interventions

-LEAs select equity interventions based on identified needs.

- Equity Interventions for Reducing LEA Equity Gaps

-LEAs describe how the selected equity intervention will be implemented, monitored, and measured for effectiveness in the current fiscal year.

Paraprofessionals

The Elementary and Secondary Education Act of 1965 (ESEA) requires that all paraprofessionals who work in a program supported by Title I funds (schoolwide program or targeted-assistance program) must meet state qualifications.

The state of Georgia ensures that it has professional standards for all paraprofessionals working in any school, including qualifications that were in place on the day before the date of enactment of the Every Student Succeeds Act. In Georgia, a paraprofessional employed by a Georgia LEA must meet one of the following requirements:

Degree: Hold an associate's degree or higher in any subject from a Georgia Professional Standards Commission (GaPSC) – accepted accredited institution: or

Coursework: Have completed two (2) years of college coursework (sixty [60] semester hours) at a GaPSC – accepted accredited institution; or

Content Area Test: Have passed the GACE Paraprofessional Assessment. If eligibility is established through the assessment, the applicant must also hold a minimum of a high school diploma or GED equivalent.

Note: An educator holding a valid Clear Renewable Teaching, Service, or Leadership certificate is considered qualified to serve in a paraprofessional position and does not need to also hold a Paraprofessional certificate.

All individuals holding a current Paraprofessional certificate in Georgia must meet requirements for certificate renewal.

Paraprofessionals who work in a schoolwide program or who are paid with Title I funds and work in a targeted-assistance school may be assigned the following instructional support duties:

- One-on-one tutoring if the tutoring is scheduled at a time when a student would not otherwise receive instruction from a teacher.
- Assisting in computer instruction.
- Conducting parental involvement activities.

- Providing instructional support in a media center.
- Serving as a translator.
- Providing instructional support services.

These paraprofessionals may not be assigned duties inconsistent with the above list of instructional support duties. Additionally, paraprofessionals may not provide instructional support to students unless they are under the direct supervision of a highly qualified teacher. A paraprofessional is deemed to work under the direct supervision of a teacher if the teacher plans the instructional activities for the paraprofessional, the teacher evaluates the achievement of students with whom the paraprofessional works, and the paraprofessional works in close and frequent physical proximity to the teacher.

20-Day Notifications

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

Requirements for Content of the 20-Day Parent Notification
In compliance with the requirements of the Every Students Succeeds Act, parents must be notified of a teacher's professional qualifications under the following circumstances:

- **Regular Education Teachers in Traditional LEAs-** When students have been assigned or taught for four or more consecutive weeks by a teacher who does not meet applicable GaPSC 'in-field' state certification requirements at the grade level and subject area in which the teacher has been assigned.
- **Regular Education Teachers in Charter/ Strategic Waiver LEAs-** When students have been assigned or taught for four or more consecutive weeks by a teacher who does not meet LEA professional qualification requirements (in alignment with approved Charter/SWSS application and CLIP) at the grade level(s) and subject area(s) in which the teacher has been assigned.
  Note: It is possible for a teacher to meet charter/ strategic waiver LEA professional qualification requirements and not meet GaPSC in-field requirements. In this circumstance, 20-Day Notification is not required.
- **Special Education Teachers in all LEAs-** LEAs should use the following criteria to determine when to send 20-Day Notifications for special education teachers:
  - **Special education teachers who do not issue grades-** 20-Day Notifications must be disseminated if the teacher does not hold special education certification.
  - **Special education teachers who issue grades-**
    - Special Education Certification- 20-Day Notifications must be disseminated if the teacher does not hold special education certification, and/or
    - Content Certification - the teacher does not hold certification for the subject area and grade level band in which the teacher issues grades.
- **Clearance Certificates-** Clearance certificate requirements are not subject to 20 Day Notifications.
- **Paraprofessionals and Substitute Teachers-** 20-Day Notifications are not required for paraprofessionals and substitute teachers.

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

In Georgia, notifications must occur within ten business days following the four consecutive weeks.

- For verification purposes, notifications must contain:
  - 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,
  - Statement that the teacher has not met State certification OR LEA charter/strategic waiver professional qualification requirements for the grade level(s) and/ or subject area(s) in which the teacher is assigned. Grade level and/or subject area must be identified.
- In Georgia, notification requirements apply to ALL teachers in all LEA schools/programs.
- Maintain records of all notifications.

Best Practices for the 20-Day Parent Notification

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

- Develop written procedures for compliance, which include a timeline and person, by position, responsible for verifying notification content, verifying dissemination of notification, and maintaining notification documentation.
- Notify parents in a format that will ensure that all parents have the opportunity to receive the information.
- Notify parents, to the extent practicable, in a language that they may understand.
- Ensure the notification includes school/program/LEA name and a point of contact by position.

The TCSS Director of Federal Programs works with Human Resources Department staff members (Chief Human Resource Officer and HR Specialists) to disseminate 20-Day Notification information to schools/administrators. Information is shared about Professional Qualifications throughout the year at administrative meetings and through email communication. Schools/administrators are reminded of the timeline for 20-Day Notifications. Copies of the parent notifications and documentation are filed in both the Human Resources and Federal Programs Departments.

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

In accordance with Every Student Succeeds Act (ESSA) of 2015, all LEAs are required to notify parents at the beginning of each school year (or at the time of enrollment of the student) of their 'Right to Know' the professional qualifications of their student's classroom teachers and paraprofessionals.

Requirements for Content of the Notification

- LEA notifications **MUST** use the language of the law.

In compliance with the requirements of the Every Student Succeeds Act, parents may request the following information:

1. *Whether the student's teacher—*
   - *has met State qualification and licensing criteria for the grade levels and subject areas in which the teacher provides instruction;*
   - *is teaching under emergency or other provisional status through which State qualification or licensing criteria have been waived; and,*
   - *is teaching in the field of discipline of the certification of the teacher.*
2. *Whether the child is provided services by paraprofessionals and, if so, their qualifications.*

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

<u>Best Practices for the Notification</u>

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

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

The TCSS includes the Parent's Right to Know information in the online registration process allowing all parents to view and acknowledge their right to request the professional qualifications of their student's classroom teachers and paraprofessionals. The Right to Know information is also included in student/parent handbooks annually. The Director of Federal Programs places the Right to Know information on the TCSS Federal Programs website with schools, principals' names and phone numbers for parent reference.

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

The Troup County School System (TCSS) provides a language acquisition program supplemented with Title I, Part A and/or Title III, Part A funds. The district is required to inform parents of an English learner identified for participation in language acquisition programs no later than 30 days after the beginning of the school year. The district must inform parents of the following:

- The reasons for the identification of their child as an English learner and the need for placement in a language acquisition program.
- The child's level of English proficiency including how the level was assessed and the status of the child's academic achievement.
- The methods of instruction used in the program that the child is or will be participating in and the methods of instruction used in other available programs including how such programs differ in content, instructional goals, and the use of English and a native language in instruction.
- How the program will meet the educational strengths and needs of their child.
- How the program will specifically help their child learn English and meet age-appropriate academic achievement standards for grade promotion and graduation.
- The specific exit requirements for the program, including the expected rate of transition from such program into classrooms that are not tailored for English learners and the expected rate of graduation from high school (including four-year adjusted cohort graduation rate and extended-year adjusted cohort graduation rates for such program) if funds are used for children in high school.
- For students with disabilities, how the program meets the objectives of the individualized education program of the child.
- Information pertaining to parental rights that includes written guidance:
    - Detailing the options that parents have to request that their child be immediately removed from such program upon request.
    - Detailing the options that parents have to decline to enroll their child in such program or to choose another program or method of instruction if available.
    - Assisting parents in selecting among various programs and methods of instruction if more than one program or method is offered by the district.

Additionally, for English learners identified during the school year, the district must notify the parents during the first two weeks of the child being placed in a language acquisition program.

Students may not be admitted to, or excluded from, any federally assisted education program on the basis of a surname or language-minority status.

The notice and information provided to parents must be in an understandable and uniform format, and to the extent practicable, provided in a language that the parents can understand. Additionally, the method of delivery must be secure to protect student information.

NOTIFICATION TO PARENTS OF PARTICIPATING ENGLISH LEARNERS PROCEDURE

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

Initial Notification to Parents of English Learners:

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

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

    - the Federal Programs Department for documentation purposes.

Notification to Parents in an Understandable Format:

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

Monitoring of Distribution of Parent Notifications for Participating English Learners:

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

TITLE I, PART A – PARENT AND FAMILY ENGAGEMENT (ESSA Sec. 1112 (e)(3); Sec. 1112(e)(3)(C); Sec. 1112(e)(4); Sec. 1116; Sec. 1116(a)(2)(B); Sec. 1116(a)(2)(D); Sec. 1116(b); Sec. 1116(c); Sec. 1116(d); Sec. 1116(e); Sec. 1116(f); Sec. 1116(h))

The Troup County Board of Education will fulfill the purpose of parental engagement by promoting active engagement among administrators, school staff, parents, the parental engagement coordinator, community leaders, school-level family liaisons, and other stakeholders in order to improve student achievement and facilitate academic success. The Board will ensure that strong strategies are in place to build capacity to engage parents/stakeholders in an effective partnership with the school and support high student academic achievement.
The Troup County Board of Education affirms and assures the rights and responsibilities of parents and legal guardians of children being served in activities funded by Title I the opportunities to participate in the planning, design, and implementation of the Title I program and its activities.

Parent Input (ESSA: Sec. 1116(a)(2)(D); Sec. 1116(b); Sec. 1116(c))

Each district that receives funds under Title I, Part A shall develop jointly with, agree on with, and distribute to, parents and family members of participating children a written parent and family engagement policy. The policy shall be incorporated into the district's plan that establishes expectations and objectives for meaningful parent and family involvement. The policy must also describe how the district will involve parents and family members in jointly developing the district plan and improvement plans.

Documentation must include holding and sending notice of opportunities for regular meetings for the purpose of formulating and responding to recommendations from parents of students assisted under Title I, Part A or Title III, Part A. Documents are revised annually to meet the changing needs of families and the school.

District Parent and Family Engagement Policy

The district works with stakeholders through multiple methods to provide input on and to revise the District Parent and Family Engagement Policy. The Troup County School System (TCSS) has a District Parent Advisory Council (PAC) that serves as an advisory team to provide input and feedback on district initiatives and plans. The PAC meets regularly during the year with the District Parent and Family Engagement Coordinator (PFEC). One of the roles of the PAC is to provide feedback on the district-level parent engagement policy. Additionally, feedback from all stakeholders is gathered at district workshops and review meetings as well as online.

During a series of meetings, all parents are invited to attend and participate as well as provide suggestions and ideas to improve the school and District Parent and Family Engagement Policy. This process is repeated annually. Meetings are held for stakeholders for revision/input on the District Parent and Family Engagement Policy. All stakeholders are invited to attend one of multiple meetings. Additionally, a feedback form is placed on the district and school websites for stakeholders to provide input on the revision process. During each meeting, the format of the policy is discussed as well as revisions through discussion. The different components of the policy are discussed including:

- What is Title I?
- Strengthening Engagement
- Adoption
- Contact Information
- Jointly-Developed District Policy for Shared Student Achievement
- Technical Assistance
- Coordination of Services
- Building Capacity of School Staff
- Annual Evaluation
- Building Capacity for Parent and Family Engagement
- Reservation of Funds
- Accessibility
- District Parent Resource Center
- Building Capacity of Parents

Discussions are also held on making the language more parent-friendly. Stakeholders submit

their feedback on a feedback form.

The district provides multiple opportunities for stakeholders to give feedback on the District Parent and Family Engagement Policy including:

- Multiple meetings to provide suggestions
- Announcements posted on the district's website
- Meeting dates and feedback link are posted on social media

Timeline:

- March/April:
    - All parents and community members are invited to attend and participate in meetings for the purpose of revising the District Parent and Family Engagement Policy. Parents are encouraged to provide input on the policy.
    - A feedback form for input on the District Parent and Family Engagement Policy is placed on the district website.
- April/May: All parents and community members are invited to provide input on the Comprehensive LEA Improvement Plan (CLIP).
- June: Final revision of policy.
- August: The revised district policy is distributed multiple ways to parents.

School Parent and Family Engagement Policy (ESSA Sec. 1116(b), Sec. 1116(c), Sec. 1116(d), Sec. 1116(e), Sec. 1116(f), Sec. 1112(e)(3)(C), Sec. 1112(e)(4))

Under ESSA, each school served under Title I Part A shall jointly develop with, and distribute to, parents and family members of participating children a written parent and family engagement policy, agreed on by such parents, that shall describe the means for carrying out the requirements.

Each school served under Title I, part A shall

- Convene an annual meeting, at a convenient time, to which all parents of participating children shall be invited and encouraged to attend, to inform parents of their school's participation in Title I, Part A part and explain the requirements of Title I, Part A, and the right of the parents to be involved
- Offer a flexible number of meetings, such as meetings in the morning or evening, and may provide, with funds provided under this part, child care or home visits, as such services relate to parental involvement
- Involve parents, in an organized, ongoing, and timely way, in the planning, review, and improvement of programs, including the planning, review, and improvement of the School Parent and Family Engagement Policy and the joint development of the schoolwide program plan
- Provide parents of participating children:
    - Timely information about programs under Title I, Part A
    - A description and explanation of the curriculum in use at the school, the forms of academic assessment used to measure student progress, and the achievement levels of the challenging State academic standards; and
    - If requested by parents, opportunities for regular meetings to formulate suggestions and to participate, as appropriate, in decisions relating to the education of their children, and respond to any such suggestions as

soon as practicably possible; and

- If the schoolwide program plan is not satisfactory to the parents of participating children, submit any parent comments on the plan when the school makes the plan available to the local educational agency.

Each Title I school works with stakeholders annually to review and revise the School Parent and Family Engagement Policy. The School Parent and Family Engagement Policy must include the following components:

- A revision date (month, day, year) and current school year
- Jointly developed
- Annual Title I Parent Meeting
- Communications
- Accessibility (How the school provides information throughout the school year, to the extent practicable, in a language and format parents can understand)
- School-Parent Compact
- Parent input regarding the 1% set-aside for parent and family engagement (for district's receiving more than $500,000 in Title I, Part A funds)
- To the extent feasible and appropriate, coordination and integration of parent and family engagement programs and activities (e.g., public preschool programs, transitions between school levels, college/career preparation)
- Strategies/activities/trainings the school will provide to build school staff capacity
- Strategies/activities/trainings the school will provide to build parent capacity

School-level administrative teams and family liaisons coordinate the review of the school-parent compact, school-level Parent and Family Engagement Policy and Comprehensive Needs Assessment and School Improvement Plan. The liaisons invite all parents to have an opportunity to participate and provide input on the documents.

Each school provides multiple opportunities for parents to give feedback on the School Parent and Family Engagement Policy.

- Multiple newsletters with meeting dates
- Multiple meetings to provide suggestions
- Meeting dates are posted on social media
- The Parent Resource Center in each school also houses this policy and offers the opportunity for input
- Each school's website contains the updated policy and feedback form for families

<u>Timeline</u>:

- <u>February</u>:
    - Input at staff meeting
- <u>March</u>:
    - Stakeholder meetings to provide input and revise the School Parent and Family Engagement Policy. Each participant is given a template supplied by the district and a copy of last year's documents. Participants are asked to turn in written recommendations for the revision of these documents on a feedback form
- <u>April</u>:
    - Revisions to school Parent and Family Engagement Policy due to the district

    - The Parent and Family Engagement Coordinator (PFEC) provides recommendations and revisions on the School Parent and Family Engagement Policy.
    - The PFEC ensures that all federal and State requirements are met
- May:
    - Final policies sent to be translated by PFEC
- August:
    - Initial distribution of the policy to stakeholders (school/district websites updated, school-parent handbooks)

School-Parent Compact (ESSA: Sec. 1116(d))

As a component of the School Parent and Family Engagement Policy, each school served under this part shall jointly develop with parents for all children served under Title I, Part A, a School-Parent Compact that outlines how parents, the entire school staff, and students will share the responsibility for improved student academic achievement and the means by which the school and parents will build and develop a partnership to help children achieve the State's high standards. The compact shall:

- Describe the school's responsibility to provide high-quality curriculum and instruction in a supportive and effective learning environment that enables the children served under this part to meet the challenging State academic standards, and 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;
- Address the importance of communication between teachers and parents on an ongoing basis through, at a minimum
    - Parent-teacher conferences, at least annually, during which the compact shall be discussed as the compact relates to the individual child's achievement
    - Frequent reports to parents on their children's progress
    - Reasonable access to staff, opportunities to volunteer and participate in their child's class, and observation of classroom activities; and
    - 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.

Each school works with stakeholders annually to review and revise the School-Parent Compact. The School-Parent Compact must include the following components:

- A revision date (month, day, year) and current school year
- Description of how the School-Parent Compact was developed jointly
- District goals from the Consolidated LEA Improvement Plan (CLIP)/Continuous System Improvement Plan (CSIP)
- School academic achievement goals from the School Improvement Plan
- Specific, academic-focused shared responsibilities (aligned with the school academic achievement goals) between the school/teacher, parents, and students for improved student academic achievement. Activities/strategies the school will provide to build partnerships with parents to help children achieve the challenging State academic standards.

- Importance of communication between teachers and parents on an ongoing basis through, at a minimum, the following:
    - Parent-teacher conferences in the elementary schools at least annually, during which the compact is addressed
    - Frequent reports to parents on their child's progress
    - 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
- Compact cover letters are signed by the school representative, parent, and student by November 1st
- New families enrolling after November 1st will be given grade level school-parent compacts upon enrollment

Each Title I school in the Troup County School System updates the School-Parent Compact annually. The following process is followed:

- Creating the Compact
    - The PFEC will send the updated Georgia Department of Education Compact template and checklist to all school-level administrative teams and family liaisons.
- Revising the Compact
    - Administrative teams and the family liaison will obtain teacher feedback on the compact at a staff training.
    - Administrative teams, family liaisons and teachers obtain student feedback on the compact.
    - Schools will host Open House where teachers will lead parents through the compacts and invite parents to give feedback on the compact.
    - After all revision meetings for the compact are held, administrative teams and family liaisons revise the compact using the input from stakeholders.
    - Compacts are sent to the PFEC to be proofed and finalized before sharing with parents.
- Signing the Compact Cover Letter
    - Teachers share school-level compacts at face-to-face meetings with parents.
        - In order for schools to reach a 100% return rate for the School-Parent Compact, teachers are asked to try a variety of strategies including:
            - Making a personal phone call to the parent/guardian
            - Sending an automated phone message
            - Offering incentives for a returned compact cover letter
            - Placing reminders in the school newsletter
            - Sharing compacts at meetings and workshops
            - Placing compacts in new student orientation packets
            - Discussing the compact at parent-teacher conferences
        - Teachers document these strategies used on an Attempt sheet for families that are difficult to reach. Three active attempts will be made by the teacher for families who have not returned the signed compact cover letter.
        - Additionally, each teacher keeps a roster that is turned into the school-level family liaison with a copy of each cover letter or

attempt sheet.

Timeline:

- August/September:
  - Input at staff meeting
  - Student input is gathered
  - Open House meetings are held to gather family input
- September/October:
  - Face-to-face meetings are scheduled with families to review final compact and sign compact cover letters
- November 1st:
  - Homeroom rosters, signed compact cover letters, Attempt sheets are turned into PFEC

Building School Staff Capacity

The TCSS also obtains parent input on building school staff capacity at the district and school level. Input opportunities are offered through the following methods:

- Face-to-face family meetings
- Parent workshop evaluation and feedback forms
- Online feedback forms

One Percent Set-Aside

The district annually receives more than $500,000 in Title I, Part A funds. The TCSS may reserve more than the 1% of its Title I, Part A funds to assist schools in carrying out PFE activities. At least 90 percent of the reserved funds must be distributed to Title I, Part A schools, with priority given to high-need schools. An LEA allocated reserved funds to schools with priority given to high needs schools.

Options include distributing PFE funds to schools based on:

- Method 1: Poverty counts multiplied by a PFE per-pupil allocation
- Method 2: Schools that are federally identified (CSI/TSI)
- Method 3: State accountability system – Georgia Milestones, CCRPI

The TCSS obtains parent input on the one percent at the district and school level. Input opportunities are offered through the following methods:

- Face-to-face family meetings
- Parent workshop evaluation and feedback forms
- Online feedback forms

Distribution (ESSA: Sec. 1116; Sec. 1116(f))

Additionally, under the Every Student Succeeds Act (ESSA), the notice and information provided to parents shall be in an understandable and uniform format and, to the extent practicable, provided in a language that the parents can understand.

The TCSS provides translation of parent engagement documentation in Spanish and Korean, including the district and school-level engagement policies. The TCSS will translate these policies in an identified language upon request.

The TCSS annually distributes the following documents to parents and the local community by November 1st:

- District Parent and Family Engagement Policy
- School Parent and Family Engagement Policy
- School-Parent Compact

The District Parent and Family Engagement Policy is distributed in the following ways:

- Placed in the school's parent resource center and school's front office
- Posted on the district and school websites
- Included in all student-parent handbooks
- Shared at several parent engagement events during the school year (Open House, Annual Title I meeting, and workshops)

The School Parent and Family Engagement Policy is distributed in the following ways:

- Placed in the school's parent resource center and school's front office
- Posted on the school websites
- Included in all student-parent handbooks
- Shared at several parent engagement events during the school year (Open House, Annual Title I meeting, and workshops)

The School-Parent Compact is distributed in the following ways:

- Placed in the school's parent resource center and school's front office
- Posted on the school websites
- Shared during parent-teacher conference at least once a year
- Included in all new student registration packets at the school level

Each school works to ensure that 100% of compact cover letters are signed and returned.

Evidence of distribution is maintained by the Parent and Family Engagement Coordinator (PFEC) and school-level family liaisons. Signed and dated compact cover letters are maintained at the school level. Family liaisons will send 5 copies per homeroom class to the PFEC.

Additionally, evidence is also maintained to show that the District Parent and Family Engagement Policy, the School Parent and Family Engagement Policy, and the School-Parent Compact were distributed in a format and, to the extent practicable, in a language parents understand. The TCSS translates each policy and compact into Spanish and Korean. Other languages are translated upon request.

Technical Assistance (ESSA: Sec. 1116(a)(2)(B); Sec. 1116(h); Sec. 1112(e)(3); Sec. 1112(e)(4)) Under ESSA, the TCSS must provide technical assistance to schools in planning and implementing effective parent and family engagement practices including:

- School Parent and Family Engagement Policies

- School-Parent Compacts
- Title I, Part A, Section 1116 requirements,
- Outreach to parents of English Learners (ELs) and the notice to parents of participating ELs in supplemental language instruction programs as described in Section 1112(e)(3).

The TCSS Parent and Family Engagement Program provides ongoing technical assistance to schools in planning and implementing effective parent and family engagement practices. These technical assistance meetings are provided throughout the year in multiple ways, including but not limited to meetings, emails, phone calls, and school visits.

The TCSS provides a monthly calendar with responsibilities that are aligned to Title I, Part A and district requirements for administrative teams and family liaisons. The calendar lists the requirements for each activity. This calendar helps ensure that all required actives are met and ongoing. The Federal Programs Department uses the calendar to verify documentation for compliance.

Title I Data Cards are kept for each school at the district level. Once a semester, the PFEC shares the data card with administrative teams and family liaisons. This data card helps ensure that all required activities are met and ongoing.

The Google Drive, a web-based file sharing service, is used to store pre-created and pre-loaded templates of agendas, presentations, sign-in sheets, evaluation forms, and a variety of other documents used to facilitate monitoring requirements and provide services to parents. These are provided to each school-level family liaison through their Gmail account in an effort to standardize each school's efforts and to ensure that Title I Parent Engagement requirements are customized and consistently carried out.

During the year, school administrators and school family engagement staff receive training on developing meaningful two-way communication and consultation with families. This includes building capacities for strong staff and family engagement with English Learner (EL) families.

The PFEC is responsible for collecting all school and district-level documentation and reviewing it for effectiveness and compliance. Technical assistance is provided on the collected documentation. The PFEC monitors parent engagement programs by:

- The monthly calendar is used to verify monitoring documents as they are completed and submitted.
- Ensuring that any noted deficiencies are corrected by the school-level parent liaison by the next review.
- The Title I Data Card is used to verify monitoring documents as they are completed and submitted.

Monthly technical assistance meetings are also held with the family liaisons to provide professional development and technical assistance.

Information may include:

- Review of common errors in documentation
- Monitoring changes
- Parent engagement strategies

- TCSS procedures
- Technology
- Building parent capacity

Technical assistance is also provided to district staff and school leaders through:

- Principal meetings
- District staff meetings (transportation, nutrition, maintenance/facilities)

Evidence of technical assistance is maintained including dated meeting agendas, dated sign-in sheets with roles of attendees, handouts/presentations, procedures, and minutes if applicable.

Building Capacity for Involvement (ESSA Sec. 1116(e), Sec. 1116(f), Sec. 1112(e)(3)(C), Sec. 1112(e)(4))

To ensure effective involvement of parents and to support a partnership among the school involved, parents, and the community to improve student academic achievement, each school and district:

- Shall provide assistance to parents of children served by the school or local educational agency, as appropriate, in understanding such topics as the challenging State academic standards, State and local academic assessments, the requirements under Title I, Part A, and how to monitor a child's progress and work with educators to improve the achievement of their children
- Shall provide materials and training to help parents to work with their children to improve their children's achievement, such as literacy training and using technology (including education about the harms of copyright piracy), as appropriate, to foster parental involvement
- Shall educate teachers, specialized instructional support personnel, principals, and other school leaders, and other staff, with the assistance of parents, in the value and utility of contributions of parents, and in how to reach out to, communicate with, and work with parents as equal partners, implement and coordinate parent programs, and build ties between parents and the school
- Shall, to the extent feasible and appropriate, coordinate and integrate parent involvement programs and activities with other federal, State, and local programs, including public pre-school programs, and conduct other activities, such as parent resource centers, that encourage and support parents in more fully participating in the education of their children
- Shall 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
- May involve parents in the development of training for teachers, principals, and other educators to improve the effectiveness of such training
- May provide necessary literacy training from funds received under Title I, Part A if the local educational agency has exhausted all other reasonably available sources of funding for such training
- May pay reasonable and necessary expenses associated with local parental involvement activities, including transportation and child care costs, to enable parents to participate in school-related meetings and training sessions
- May train parents to enhance the involvement of other parents
- May arrange school meetings at a variety of times, or conduct in-home conferences

between teachers or other educators, who work directly with participating children, with parents who are unable to attend such conferences at school, in order to maximize parental involvement and participation
- May adopt and implement model approaches to improving parental involvement
- May establish a districtwide parent advisory council to provide advice on all matters related to parental involvement in programs supported under this section
- May develop appropriate roles for community-based organizations and businesses in parent involvement activities
- Shall provide such other reasonable support for parental involvement activities under this section as parents may request

In carrying out the parent and family engagement requirements of Title I, Part A, the district and schools, to the extent practicable, shall provide opportunities for the informed participation of parents and family members (including parents and family members who have limited English proficiency, parents and family members with disabilities, and parents and family members of migratory children), including providing information and school reports required in a format and, to the extent practicable, in a language such parents understand.

The TCSS works to build the capacity of school staff and parents to increase academic achievement for students.

Staff Capacity

Under ESSA, the district is required to educate teachers, specialized instructional support personnel, principals, other school leaders, and other school staff, with the assistance of parents, in the value and utility of contributions of parents, and in how to reach out to, communicate with, and work with parents as equal partners, implement and coordinate parent programs, and build ties between parents and the school.

Each semester, the district and school will have at least two professional learning activities on building staff capacity. One of these activities will be an in person or online meeting. The second may be a meeting or other form of communication with faculty, links to articles, social media posts, online training videos, tip sheets, flyers, handouts, brochures, website screenshots, and other online resources.

Evidence of professional learning is maintained by the district and school-level family liaison including dates agendas, sign-in sheets with roles of attendees and signatures of teachers, specialized instructional support personnel, principals, other school leaders, and other school staff, handouts, and emails.

Parent Capacity

The district shall provide the coordination, technical assistance, and other support necessary to assist participating schools in planning and implementing effective parent and family engagement activities to improve student academic achievement and school performance. The TCSS provides assistance to parents to support a partnership among the school involved, parents, and the community to improve student academic achievement. The district and each Title I school provides opportunities to build parent capacity in supporting the education of their

child through:

- In-person meetings (including the Annual Title I meeting)
- Annual Parent, Teacher, Student Conferences

Opportunities are advertised through avenues such as flyers, newsletters, agendas, emails, phone messages, school website, social media posts, and/or marquees. A minimum of three advertisements are shared for each event. Information is also provided in a format and in a language to the extent practicable that parents can understand.

The district and schools will provide parents of participating students timely information concerning:

- Description and explanation of the school's curriculum
- Individual student assessment results and interpretation of those results
- Assessments used to measure student progress and the achievement levels of the challenging State academic standards

The district and schools will provide assistance to parents of children served under this program in understanding:

- The challenging State academic standards
- The components of a schoolwide program, if applicable
- The components of a targeted assistance school program, if applicable
- The state and local assessments, including alternate assessments
- The requirements of Title I, Part A
- Ways parents can monitor their children's progress and work with educators to improve the academic achievement of their children

Additionally, the district and schools will 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 parent and family engagement.

The district and schools will also coordinate and integrate parent and family engagement programs, activities with other federal, State, and local programs, including public preschool programs, and conduct other activities such as parent resource centers, that encourage and support parents in more fully participating in the education of their children. Each school offers parent resource centers for families.

Evidence of building capacity is maintained by the district and school-level family liaison including dated agendas, sign-in sheets with roles of attendees, signatures, handouts, advertisements, and evaluations. Schools are required to maintain the following documentation to provide evidence that the six requirements of parental engagement are offered:

-Invites (3 samples)
-Sign in sheets
-Agendas
-Notes about meetings (including presentation materials and handouts)
-Evaluations

<u>Parents of English Learners</u>

Each district receiving funds under Title I, Part A shall implement an effective means of outreach to parents of English learners to inform the parents regarding how the parents can

- Be involved in the education of their children

- Be active participants in assisting their children to
    - Attain English proficiency
    - Achieve at high levels within a well-rounded education
    - Meet the challenging State academic standards expected of all students

Implementing an effective means of outreach to parents shall include holding and sending notice of opportunities for regular meetings for the purpose of formulating and responding to recommendations from parents of students assisted under Title I, Part A or Title III, Part A.

Effectiveness of the Parent Engagement Plans and Practices

At various times throughout the school year, the TCSS offers many opportunities for evaluation of the content and effectiveness of parent and family engagement in improving the academic quality of the schools served under Title I, Part A, including:

- Identifying barriers to greater participation by parents in activities, with particular attention to parents who are economically disadvantaged, have limited English proficiency, have limited literacy, or are of any racial or minority background
- Using the findings of such evaluations to design evidence-based strategies for more effective parent and family engagement, and to revise, if necessary, the parent and family engagement policies

Data is collected to determine the effectiveness of parent engagement plans and practices. Data includes:

- Face-to-face meetings with stakeholders
- Feedback forms/evaluations at meetings to determine the effectiveness of the individual activity
- Online feedback
- Attendance data

Workshop feedback forms/evaluations are continually utilized to improve programs offered. Feedback forms/evaluations are reviewed at the school and district level for future planning. Reviews include:

- Topics of interest for workshops
- Sources of school related information
- Effectiveness of school-home communications
- Preferred locations and times for workshops
- Use of parent engagement funds

Parent input on use of parent engagement funds is utilized to plan parent activities. Parents are given opportunities to provide input on the use of funds at the School Improvement Forums and District Improvement Forum.

Parent data on attendance and contacts is maintained at both the school and district level. The data is reviewed by the PFEC and the Director of Federal Programs.

All data collected at the school and district level is used to refine processes and to better support parents including revision of:

- Programs offered
- District Parent and Family Engagement Policy
- School Parent and Family Engagement Policy

- School-Parent Compact
- Building Staff Capacity
- Reservation of Funds

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

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

Comprehensive Support and Improvement (CSI)			
Criteria Number	**Criteria Category**	**Entrance Criteria**	**Exit Criteria**
1	Lowest 5%	**Title I Schools Only:** When ranked according to their three-year CCRPI average, are among the lowest performing schools that represent 5% of all schools eligible for identification.	A school may exit if the school no longer meets the lowest 5% entrance criteria AND demonstrates an improvement in the overall CCRPI score greater than or equal to 3% of the gap between the baseline CCRPI score (the three-year average that led to the school's identification) and 100. This 3% improvement must be demonstrated from the highest of the three CCRPI scores used in the three-year average to the current CCRPI score.
2	Low Graduation Rate	**All High Schools:** Have a four-year adjusted cohort graduation rate less than or equal to 67%.	Attains a four-year adjusted cohort graduation rate greater than 67%.
3	TSI Additional Targeted Support	**Title I Schools Only:** Have been identified as a targeted support and improvement (TSI) school for additional targeted support for three consecutive years without exiting TSI status.	Meet the TSI exit criteria.

4	Promise Schools	**Title I Schools Only:** When ranked according to their three-year CCRPI average, are among the lowest performing schools that represent greater than 5% to 10% of all schools eligible for identification. The purpose of Promise Schools is to provide supports to these schools to sustain improvement or provide proactive supports before they fall into the lowest 5% CSI category.	A school may exit if the school no longer meets the greater than 5% to 10% entrance criteria AND the school's current overall CCRPI score is greater than the baseline CCRPI score (the three-year average that led to the school's identification).

Targeted Support and Improvement (TSI)			
Criteria Number	**Criteria Category**	**Entrance Criteria**	**Exit Criteria**
1	Consistently Underperforming Subgroup	**All Schools:** Have at least one subgroup that is performing in the lowest 5% of all schools in at least 50% of CCRPI components.	A school may exit if no subgroup is performing in the lowest 5% of all schools in at least 50% of CCRPI components.
2	Additional Targeted Support	**All Schools:** Among all schools identified for consistently underperforming subgroup, have at least one subgroup that is performing in the lowest 5% of all schools in all CCRPI components. Note: Title I schools identified for additional targeted support will move to the CSI list if they do not meet the TSI exit criteria after three consecutive years.	A school may exit if no subgroup is performing in the lowest 5% of all schools in all CCRPI components AND the subgroup's current score is greater than the previous score for all components in which the subgroup is no longer in the lowest 5%.

Identified Schools

For the 2025-2026 school year, the Troup County School System (TCSS) has the following school designations:

School	Designation
Franklin Forest Elementary	TSI
Clearview Elementary School	Promise School
Callaway Elementary School	Promise School

GaDOE Support

GaDOE works directly with CSI schools and provides assistance to help them improve the educational outcomes of their students. Professional learning and targeted technical assistance is provided to TSI schools. GaDOE support includes:

- CSI Support
  - Ongoing collaboration and technical assistance for continuous improvement
  - District and school level reviews and walkthroughs
  - Annual Title I, Part A 1003 School Improvement Funds formula allocation
  - Professional learning
  - GaDOE District Effectiveness Specialist (DES) to support TCSS' plan of support for identified schools
  - Ongoing support provided by a GaDOE School Effectiveness Specialist (SES), RESA School Improvement Specialist (SIS), and GaDOE ad hoc members as needed
- CSI-Alternative Support
  - Annual Title I, Part A 1003 School Improvement Funds formula allocation
  - Designated GaDOE Alternative Education support
  - Standards focused on program evaluations to improve educational programs and services, transition processes, development of individualized graduation plans, effective communication, social work, and evidence-based counseling
- CSI-Promise Support
  - Ongoing collaboration and technical assistance for continuous improvement
  - District and school level reviews and walkthroughs as requested
  - Annual Title I, Part A 1003 School Improvement Funds formula allocation
  - GaDOE District Effectiveness Specialist (DES) to support TCSS' plan of support for identified schools
- TSI Support
  - Ongoing collaboration and technical assistance for continuous improvement
  - District and school level reviews and walkthroughs as requested
  - Annual Title I, Part A 1003 School Improvement Funds formula allocation
  - Professional learning
  - GaDOE District Effectiveness Specialist (DES) to support TCSS' plan of support for identified schools

School Improvement/Schoolwide Program Plans (ESSA: Sec. 1116(b)(3); Sec. 1116(b)(3)(A))

Under the Every Student Succeeds Act, each school must develop or revise a school plan in consultation with parents, school staff, the district and outside experts no later than three months after being identified. The plan must be approved by the district. The plan is revised annually and must:

- Incorporate strategies based on evidence-based research that will strengthen the core academic subjects in the school and address the specific academic issues that caused the school to be identified for school improvement
- Adopt policies and practices concerning the school's core academic subjects that have the greatest likelihood of ensuring that all groups of students enrolled in the school will meet the State's proficient level of achievement on the State academic assessment
- Provide teachers and administrators high-quality professional development that directly addresses the academic achievement problem that caused the school to be identified for school improvement
- Establish specific annual, measurable objectives for continuous and substantial progress by each group of students
- Include strategies to promote effective parent engagement

The TCSS has 13 schools that are Title I Schoolwide schools, including a delinquent facility. When schoolwide schools are identified for improvement, a single plan is developed that contains the schoolwide components. Annually, the TCSS participates in the review/revision of each School Improvement/Schoolwide Plan/Targeted Assistance School (if applicable).

Process for Creation/Review of the School Improvement/Schoolwide Plan (ESSA: Sec. 1114(b)(1); Sec. 1116(b)(3)(A))

The Director Assessment and Accountability and the Federal Programs Director create a timeline for the review/revision of School Improvement/Schoolwide Plans. At an administrative meeting, information regarding the timeline and process is shared with administrators.

Technical assistance sessions are offered and technical assistance is also provided upon request.

Stakeholder meeting agendas, sign-in sheets and summary forms are also provided to principals for stakeholder meetings for input on the Comprehensive Needs Assessment and School Improvement/Schoolwide Plan.

Meetings are held for stakeholders for revision/input on the School Parent and Family Engagement Policy. All stakeholders are invited to attend one of multiple meetings. Additionally, a feedback form is placed on the school website for stakeholders to provide input on the revision process. During each meeting, the format of the policy is discussed as well as revisions through discussion. The different components of the policy are discussed including:

- What is Title I?
- Jointly-Developed School Policy for Shared Student Achievement
- School-Parent Compact
- Annual Title I Meeting
- Communications

- Reservation of Funds
- Coordination of Services
- Building Capacity of School Staff
- Building Capacity for Family Engagement
- Parent and Family Engagement
- School Parent Resource Center
- District Parent Resource Center
- Building Capacity of Parents

Stakeholders submit their feedback on a feedback form.

School Parent and Family Engagement Policies are submitted to the District Parent and Family Engagement Coordinator. The coordinator reviews each school's policy and requests corrections as needed.

Each school hosts school council/leadership meetings to adopt the School Improvement Plan/Schoolwide Plan.

The Director of Federal Programs and the Director of School Improvement review each plan to determine if the plan is complete and meets the criteria listed in the Schoolwide Program Checklist. Data is reviewed to ensure that it supports identified initiatives. Additionally, budget requests are cross-referenced to identified needs and actions steps in the plan. The directors mark the plan for information needed. The Schoolwide Program Checklist is reviewed with the principal for required schoolwide components that were not covered in the plan. These requirements are then added to the plan. If additional data is needed, the principal is given a deadline for submission of data to complete the plan.

Verifying Participation of Stakeholders

Multiple meetings are offered for stakeholders to participate in the review/revision of the Comprehensive Needs Assessment and School Improvement Plan/Schoolwide Plan at the school level. All stakeholders are invited to give input and discuss the revisions.

Stakeholders are also offered the opportunity to provide input through an online form. This online form is posted on each's schools website and is advertised through the parent newsletter.

Guidance is provided to schools through the Director of Federal Programs and the District Parent and Family Engagement Coordinator regarding stakeholder input. The following stakeholder groups must be represented:

- Administrators
- Central office staff
- Certified staff
- Classified staff
- Support staff
- Parents
- Students (secondary)
- Community (business, faith-based organizations, general public)

Guidance is shared with schools regarding stakeholder representation including that:

- Parents should not represent the community group
- Staff should not represent the parent or community groups

The Federal Programs Department checks sign-in sheets from each school to ensure that all stakeholder groups are represented. If all stakeholder groups are not represented, the department works with the school to hold additional stakeholder meetings.

Approval of the School Improvement/Schoolwide Plan

The Director of Federal Programs checks all revisions to the plan to ensure that all requests from principals are complete. If revisions are needed, the Director of Federal Programs and/or Director of Assessment and Accountability follow-up with the principal via email and/or phone until the revisions are complete. The Schoolwide Program Checklist is sent to schools in September to be signed.

Timeline

The general timeline for review/revision of the School Improvement/Schoolwide Plan for each school is as follows:

- March/April
  - School Improvement Forums
    - Stakeholder input/revision of the School Parent and Family Engagement Policy, School Improvement Plan
- May
  - Submission of draft School Parent and Family Engagement Policy
  - Approval of final School Parent and Family Engagement Policy
- June
  - School meetings to review revisions for Comprehensive Needs Assessment and School Improvement Plan
  - Revisions completed for Comprehensive Needs Assessment/School Improvement Plans
- July-September
  - Changes based on data release may be made on School Improvement/Schoolwide Plans

Resolution Procedures for Unapproved Plans

If principals do not submit the data in the process outlined above to complete their School Improvement/Schoolwide Plan, the Director of Federal Programs and the Director of Assessment involve the Teaching and Learning Executive Director to ensure completion and approval of the plan.

Revision of Plan for the 2025-2026 School Year

The TCSS will work collaboratively with GaDOE and RESA personnel to revise the School Improvement Plan for the FY26 school year. For CSI schools, a Georgia School Assessment of Performance on Systems (GSAPS) will be conducted. GSAPS recommendations will be incorporated into identified schools' FY26 School Improvement Plans.

Technical Support (ESSA: Sec. 1112(c)(1)(D); Sec. 1116(b)(4)-(6))

Technical support is provided to identified schools throughout the school improvement planning process. Additional technical support is based on identified needs for each school. Technical support is provided by the Executive Director of Teaching and Learning, the Director of Assessment and Accountability, the Director of Federal Programs and other district leadership.

Technical assistance includes assisting in:

- Analyzing data from assessments and other examples of student work to identify and address problems in instruction, in implementing the parental engagement requirements and the responsibilities of the school and district under the school plan, and to identify and address solutions to such problems.
- Identifying and implementing professional learning, instructional strategies, and methods of instruction that are based on evidence-based research and that have proven effective in addressing the specific instructional issues that caused the school to be identified for school improvement.
- Analyzing and revising the school's budget so that the school's resources are more effectively allocated to the activities most likely to increase student academic achievement and to remove the school from school improvement status.

District Support of Identified Schools

The district will provide ongoing leadership and support to the school. The principal's supervisor will monitor the implementation of the school improvement plan and attend regular meetings.

The district works with each identified school to ensure that professional learning is sustained, job-embedded, collaborative, data driven, and focused on student instructional needs. The district ensures that high-quality professional learning directly addresses the academic achievement problem that caused the school to be identified for school improvement.

Additionally, identified schools participate in GaDOE required training opportunities and professional learning suggested by GaDOE and RESA personnel when applicable.

Professional learning includes activities that:

- Improve and increase teachers' knowledge of the academic subjects the teachers teach and enable teachers to become highly effective
- Are an integral part of broad schoolwide and districtwide educational improvement plans
- Give teachers, principals, and administrators the knowledge and skills to provide students with the opportunity to meet challenging State academic content standards and student academic achievement standards
- Improve classroom management skills
- Are high quality, sustained, intensive, and classroom-focused in order to have a positive and lasting impact on classroom instruction and the teacher's performance in the classroom and are not 1-day or short-term workshops or conferences
- Support the recruiting, hiring, and training of highly effective teachers, including teachers who obtained certification through alternative routes to certification
- Advance teacher understanding of effective instructional strategies that are

    - Based on evidence-based research and
    - Strategies for improving student academic achievement or substantially increasing the knowledge and teaching skills of teachers
- Are aligned with and directly related to
    - State academic content standards, student academic achievement standards, and assessments
    - The curricula and programs tied to the standards
- Are developed with extensive participation of teachers, principals, parents, and administrators of schools to be served
- Are designed to give teachers of limited English proficient children, and other teachers and instructional staff, the knowledge and skills to provide instruction and appropriate language and academic support services to those children, including the appropriate use of curricula and assessments
- To the extent appropriate, provide training for teachers and principals in the use of technology so that technology and technology applications are effectively used in the classroom to improve teaching and learning in the curricula and core academic subjects in which the teachers teach
- As a whole, are regularly evaluated for their impact on increased teacher effectiveness and improved student academic achievement, with the findings of the evaluations used to improve the quality of professional development
- Provide instruction in methods of teaching children with special needs
- Include instruction in the use of data and assessments to inform and instruct classroom practice
- Include instruction in ways that teachers, principals, pupil services personnel, and school administrators may work more effectively with parents

Professional learning may include activities that:

- Involve the forming of partnerships with institutions of higher education to establish school-based teacher training programs that provide prospective teachers and beginning teachers with an opportunity to work under the guidance of experienced teachers and college faculty
- Create programs to enable paraprofessionals (assisting teachers employed by the district receiving assistance under part A of title I) to obtain the education necessary for those paraprofessionals to become certified and licensed teachers
- Provide follow-up training to teachers who have participated in activities that are designed to ensure that the knowledge and skills learned by the teachers are implemented in the classroom.

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

The Title I Section 1003 school improvement grants provide financial resources to Local Educational Agencies (LEAs) on behalf of Title I schools identified as Comprehensive Support and Improvement (CSI) or Targeted Support and Improvement (TSI) schools as defined by the Every Student Succeeds Act (ESSA).

Grants are awarded to the District on behalf of identified schools to support school improvement efforts, attendance at GaDOE required professional learning, and adherence to the guidelines expressed in the MOA.
School Improvement 1003(a) allocations are determined by the GaDOE annually.

School Improvement 1003(a) Budget Development

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

- Information on the school improvement grant is released from the GaDOE
- The Federal Programs Director will review the School Improvement Plan (SIP), collaborate with the principal, GaDOE staff, and RESA staff to develop the budget.
- Districts submit the following documents to the DES:
  - District Plan of Support for identified school(s),
  - School Improvement Plan(s) for identified school(s),
  - Budget
- Plans will be reviewed and approved by the Division of School and District Effectiveness
- The Federal Programs Director imports budget or aggregate of budgets into the Consolidated Application and attaches the signed Justification of Expenses for each school
- Staff from the Division of School and District Effectiveness will review and approve budgets which must be submitted by September 30th, and feedback will be provided to schools and districts as needed.
- Indirect cost is not allowable for Title I, A 1003(a) School Improvement Grant funding, since the grant regulation indicates that 100% of the funding must be directly related to instruction, and professional learning opportunities for teachers and school administrators that support instruction.

Monitoring the Use of School Improvement 1003(a) Funds (ESSA: Sec. 1116(c)(7))

District staff is involved in the monitoring of the use of School Improvement 1003(a) funds. Staff ensure the soundness of instructional strategies and the effectiveness of professional learning. The following includes the main monitoring roles of district staff:

- The Elementary/Secondary Director/Coordinator monitors the implementation of the school improvement plan and attends school meetings to monitor progress.
- The director/coordinator will monitor the implementation of GaDOE's expectations.
- The director/coordinator monitors the funded School Improvement 1003(a) initiatives. Each month, the grant expenditures are monitored by the director/coordinator and compared to GaDOE targets. Changes to the grant are made as needed to ensure the funds are expended.

HOMELESS (ESSA: Sec. 1112 (a)(1) and (O); MV Sec. 722(g)(B); 722(g)(3)(E); 722(g)(3)(C); 722(g)(1)(F))

The Troup County School System (TCSS) may receive a grant only if it has on file with the GaDOE a plan that is coordinated with other programs including the McKinney-Vento Homeless Assistance Act.

Under the Every Student Succeeds Act, the TCSS must have:

- A description of procedures that ensure that
  - Homeless children have equal access to the same public preschool programs, administered by the state agency, as provided to other children in the state
  - Homeless youths and youths separated from the public schools are identified and accorded equal access to appropriate secondary education and support services

- Homeless children and youths who meet the relevant eligibility criteria are able to participate in federal, state, or local before and after-school care programs

- A description of the services the district will provide homeless children, including services provided with funds reserved

Additionally, if a dispute arises over school selection or enrollment in a school:

- The child or youth shall be immediately admitted to the school in which enrollment is sought, pending resolution of the dispute
- The parent or guardian of the child or youth shall be provided with a written explanation of the school's decision regarding school selection or enrollment, including the rights of the parent, guardian, or youth to appeal the decision
- The child, youth, parent, or guardian shall be referred to the district homeless liaison who shall carry out the dispute resolution process as described as expeditiously as possible after receiving notice of the dispute
- In the case of an unaccompanied youth, the district homeless liaison shall ensure that the youth is immediately enrolled in school pending resolution of the dispute

The school selected shall immediately enroll the homeless child or youth, even if the child or youth is unable to produce records normally required for enrollment, such as previous academic records, medical records, proof of residency, or other documentation.

Homeless Liaison
Troup County School System has designated the Assistant Director of Student Information Systems to serve as the district homeless liaison.

Policy
Homeless Students

Descriptor Code: JBC(1)

Homeless Students
To the extent practical and as required by law, the Troup County School District will work with unaccompanied youth, homeless students and their families to provide stability in school attendance and other services. Special attention will be given to ensuring the enrollment and attendance of homeless students not currently attending school. Homeless students will be provided district services for which they are eligible, including Head Start and comparable pre-school programs, Title I, similar state programs, special education, bilingual education, vocational and technical education programs, gifted and talented programs and school nutritional programs.

A. Definition and Identification

McKinney-Vento Homeless Assistance Act

The definition of "homeless children and youth" according to the McKinney-Vento Homeless Assistance Act reauthorized December 10, 2015 by Title IX, Part A of the Every Student Succeeds Act (ESSA), means individuals who lack a fixed, regular, and adequate nighttime residence.

It includes children and youth who:

1. are temporarily sharing the housing of other persons due to loss of housing, economic hardship, or similar reason.
2. are living in motels, hotels, or camping grounds due to the lack of alternative adequate accommodations.
3. are living in emergency shelters.
4. are abandoned in hospitals.
5. have a nighttime residence that is a public or private place not designed for or not ordinarily used as a regular sleeping accommodation for human beings.
6. are living in cars, parks, or public spaces, abandoned buildings, substandard housing, bus or train stations, or similar settings.
7. runaway children or children who are abandoned.

Migratory children and unaccompanied youth not in the physical custody of a parent or guardian may be considered homeless if they meet the definition stated above for homeless.

Homeless status is determined in cooperation with parents or in the case of unaccompanied youth, the Troup County liaison. Homeless status may be documented through a variety of forms such as

the Homeless Tracking Intake Form, the Residency/Language Questionnaire or through direct contact with Troup County staff members.

B. School Selection

The Board of Education must, to the extent feasible:

1. keep students in homeless situations in their school of origin (defined as the school the student attended when permanently housed or the school in which the student last enrolled) unless it is against the parent's or guardian's wishes.
2. allow students to continue attending their school of origin the entire time they are homeless and until the end of any academic year in which they move into permanent housing.
3. allow the student to enroll in any public school that students living in the same attendance area are eligible to attend.

In the case of unaccompanied youth, the local educational agency liaison will assist in placement or enrollment decisions considering the requests of such unaccompanied youth.

C. Enrollment

The Board of Education must enroll students in homeless situations immediately, even if they do not have documents normally required for enrollment, such as previous school records, medical or immunization records, proof of residency, birth certificate, proof of guardianship, or other documents. Records will immediately be requested from the previous school.

The term "enroll" is defined to mean attending school and participating fully in school activities.

D. Credit for Coursework

The Board will accept student course credit earned in previously attended school(s) that are accredited or from schools that hold provisional status at the time the credit was earned. State assessments will not be required of students enrolling from institutions where credit has been earned for courses meeting Georgia's 9-12 curriculum standards. The district will make every attempt to award full or partial credit for coursework successfully attempted.

E. Transportation

At a parent or guardian's request, homeless students must be provided with transportation assistance to and from their school of origin, for the duration of the school year, if school of origin is determined to be in the best interest of the student. For unaccompanied youth, transportation assistance to and from the school of origin must be provided at the local liaison's request, if school of origin is determined to be in the best interest of the student.

F. Disputes

A parent/guardian having a concern or complaint regarding placement or education of a homeless child or youth may initiate the resolution process directly at the principal's office of the school in

which enrollment is sought or at the district homeless liaison's office, either of which shall carry out the dispute resolution process as expeditiously as possible. If the dispute arises over school selection or enrollment, the child or youth shall be enrolled immediately in the school in which he/she is seeking admission, pending resolution of the dispute. Decisions at the school level may be appealed to the Hardship Committee, whose decisions may be appealed to the Board. If the dispute remains unresolved at the district level, the parent/guardian may request a review of the dispute and the Board's decision by the Georgia Department of Education, in accordance with Dispute Resolution Guidelines and Procedures included in the Georgia Department of Education's publication "Implementing Title I in Georgia Schools: A Handbook for Title I Directors," which is available on the Department's web site.

Date Adopted: 7/1/2001
Last Revised: 12/15/2022

TROUP COUNTY SCHOOL SYSTEM
WRITTEN NOTIFICATION FORM

This form should be completed by a school administrator or the district Homeless Liaison when the parent's/guardian's request to return to the school of origin is denied. Fax completed form to the Federal Programs office at 706-242-4899 and give original to the parent/guardian along with the Dispute Resolution Form.

Date:_____ School:_____

Name and Title of Person Completing Form: _____

In compliance with Section 722(g)(3)(E) of the McKinney-Vento Homeless Assistance Act of 2001, the following written notification is provided to:

Parent/Guardian**:** _____

Student(s): _____

After reviewing your request to enroll the student(s) listed above, the enrollment request is denied. This determination was based upon:

_____

_____

_____

_____

Please have parent/guardian sign and date below to indicate that they have received a copy of this form.

_____ _____

Parent/Guardian Signature Date

- You have the right to appeal this decision by completing the attached Dispute Resolution Form or provide your explanation verbally to the district's Director of Federal Programs at 706-812-7900
    - Resolution by the Hardship Committee will be made within 7 business days of receipt of Dispute Resolution Form.
    - If the matter is not resolved at that level, the Superintendent shall issue the District's decision within 10 business days of the second dispute by parent/guardian.
    - If the matter is not resolved at that level, the parent/guardian may appeal this decision by contacting the Georgia Department of Education Homeless Education Coordinator (see contact information below).
- The student listed above has the right to enroll immediately in the requested school, including full participation in all school activities pending resolution of the dispute.
- You may contact the state coordinator if further help is needed:

State Coordinator for Homeless Education
Georgia Department of Education
Office - 404-656-2004

DISPUTE RESOLUTION FORM

This form is to be completed by the parent/guardian or unaccompanied youth when a dispute arises over school enrollment. The information may be shared verbally with the Coordinator of the Office of Student Assignment instead of completing this form. The Coordinator of Federal Programs can be contacted at 706-812-7900.

Date submitted: _____

Student(s): _____

Person completing form: _____

Relation to student(s): _____

I may be contacted at (phone or e-mail): _____

I wish to appeal the enrollment decision made by: _____

School: _____

I have been provided with a written explanation of the school's decision (check one):
_____Yes_____No

You may include a written explanation to support your appeal in this space, or you may provide your explanation verbally.

_____
_____
_____
_____
_____
_____

Signature of person submitting dispute: _____

Return completed form to school or the Office of Federal Programs.

----------For School Use----------
Fax a copy of this completed form to the Office of Federal Programs at 706-242-4899.
Give a copy to the parent/guardian or unaccompanied youth.
Maintain the original at school.
Date received by the Office of Federal Programs**:** _____

SERVICES FOR NEGLECTED AND DELINQUENT CHILDREN (NEGLECTED SET-ASIDE (ESSA: Sec. 1112 (b); Sec. 1113(c)(3); Sec. 1401

There are three neglected facilities in Troup County.

- The Connections Program, Twin Cedars Youth Services, Inc.
- Georgia Sheriffs' Youth Homes, Pineland Program
- Family Life Center

Funds through the Title I, Part A Neglected set-aside provide tutors for at-risk students in these programs. Documentation is maintained by the Federal Programs Office for tutors. Funds are also utilized to provide materials and supplies and technology when needed.

Annually, a consultation meeting is held with staff to discuss prioritized needs for the school year. Regular communication continues throughout the year. Meeting minutes,agendas, emails, and phone logs will be maintained by the Director of Federal Programs, Federal Programs Administrative Assistant, and the district Parent and Family Engagement Coordinator.

Equipment is inventoried annually based on the inventory timeline. Federal Programs Office staff will conduct inventory checks with the neglected program staff.

The staff of Twin Cedars/Connections and Pineland will annually submit the source data for the *"Annual Survey of Institutions for Neglected and Delinquent Children."* The facility staff will select a thirty (30) day window in which one day falls in the month of October for the completion of all surveys.

PREVENTION AND INTERVENTION PROGRAMS FOR CHILDREN WHO ARE NEGLECTED, DELINQUENT, OR AT-RISK (TITLE I, PART D, SUBPART 2 GRANTEES) (ESSA: Sec. 1421-1432)

The purpose of Title I, Part D is:

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

Local school systems and state agencies in Georgia (the Department of Juvenile Justice, the Department of Corrections and the Department of Human Services) serve neglected and/or delinquent youths in institutions operated or contracted by these agencies. The Georgia Department of Education provides resources to school systems and state agencies to carry out the purposes of Title I, Part D based upon the submission of a required plan and application.

There is one facility for delinquent students in the Troup County School System (TCSS). Ault Academy is a 618 residential facility. Students attend Ault Academy on the Bradfield Campus of Twin Cedars Youth Services, Inc. Currently, Ault Academy is a Schoolwide school. The TCSS serves these students with Title I,

Part A and Title I, Part D funds. These funds provide paraprofessionals, supplies, computers, Promethean boards, and professional development. Summer school will be offered at Ault Academy for any students who need it. Ault Academy is 100% free lunch funded by a separate federal grant.

Federal Programs Department staff work directly with Ault Academy to ensure that students are receiving the services needed. Meeting minutes, agendas, emails, and phone logs will be maintained by the Director of Federal Programs, Federal Programs Administrative Assistant, and the district Parent and Family Engagement Coordinator.

The administration/staff of Ault Academy annually:

- Complete an application (13 Questions) to be submitted to the GaDOE through Consolidated Application at the beginning of each school year.
- Submit the source data for the *"Annual Survey of Institutions for Neglected and Delinquent Children."*
    - The facility staff will select a thirty (30) day window in which one day falls in the month of October for the completion of all surveys.
- Submit pre and post test data for the *"Annual Evaluation for Title I, Part D, Subpart 2."*
- Follow all parental notifications and engagement procedures
- Submit a Schoolwide Improvement Plan
- Submit a Title I, Part A Program Evaluation

SERVICES FOR CHILDREN IN FOSTER CARE (ESSA: Sec. 1112(c)(5)

The Foster Care Program focuses on school access, improved educational outcomes, and enhanced academic stability for children and youth in foster care. The provisions derived from the Every Student Succeeds Act (ESSA) establish guidelines for recognizing and addressing the unique needs of foster care children and youth. The Foster Care Program has the responsibility of working closely with local child welfare agencies and local educational agencies to identify children and youth in foster care and to ensure the successful implementation of ESSA provisions.

The Troup County School System foster care liaison/point of contact meets/communicates regularly with school personnel to discuss the requirements of foster care youth as described in ESSA. Among the topics discussed are the transportation requirement for schools of origin and the definition of and services for students identified as foster care youth. The foster care liaison supervises and works very closely with the school guidance counselors/foster care contacts and transportation director/designee to assure students receive the services they need. The point of contact regularly communicates with the child welfare agencies. Annually, Troup County School System's policy and procedures for foster care students are reviewed.

Troup County School System
Federal Programs
Students in Foster Care Procedures

1. Upon enrollment of a foster care student, the TCSS Office of Student Assignment will provide a copy of the DFCS placement letter to the LEA Foster Care Point of Contact.
2. The LEA Foster Care Point of Contact will flag the student in Infinite Campus for the current school year. The student will also be added to the school's Foster Care list in Infinite Campus.

3. The LEA Foster Care Point of Contact will then notify the school's foster care point of contact and school's social worker about the new flag.
4. If there is a need for transportation to the school of origin, the LEA Foster Care Point of Contact will discuss the options with DFCS and request that the transportation forms be filled out and returned.
5. The LEA Foster Care Point of Contact will communicate with TCSS transportation about the need. The transportation provision will only be effective for the remained of the current school year. Over the summer, students will transition back to their zoned school to begin the new year.
6. The School Point of Contact will quarterly check Infinite Campus for foster care students' progress in academics, attendance, and behavior. If concerns are noted, he/she will communicate with the school's foster care point of contact and the LEA's Foster Care Point of Contact.
7. Each summer, the LEA Foster Care Point of Contact will check in Infinite Campus to be sure the lines of enrollment are correct for any students that were using transportation provisions. For the new school year, those students need to go to their zoned school and often times, the lines of enrollment will need to be changed.

House Bill 855 (HB 855) went into effect in the fall of 2021. The Troup County School System procedures as related to this bill are included below.

HB 855 states that "upon the enrollment of a foster care student, a local school system shall immediately and deliberately assess whether exposure to the trauma has had or is likely to have an adverse impact on the foster care student's educational performance, including both academics and classroom behavior. The local school system's assessment shall be part of its overall determination of whether the initial evaluation process for determining eligibility for special education and related services should be commenced for such foster care student". Troup County School System will ensure compliance with HB 855 with the following procedures:

1. From the time of enrollment, TCSS has 60 days in which to convene a team of adults to give input on the Education Impact Screener. This Case Management Consultation Team should be comprised of:
    - LEA Foster Care Point of Contact
    - LEA School Social Worker
    - LEA team members- school administrator, school foster care point of contact, (as needed on a case by case basis: special education staff, school psychologist, mental health counselor, etc.)
    - Local DFCS Foster Care Supervisor, Case Manager, or other designee (as needed: DFCS Region 4 Education Support Monitor)
    - Family member when appropriate
2. If the DFCS Case Manager cannot attend the meeting, a phone call will take place before the team meeting so that pertinent information can be collected to share.
3. Collaborate with the Exceptional Education team if the student has an IEP. This team is required to meet on the student within the first 30 days of enrollment. Both meetings could be held at the same time.
4. During the team meeting, the LEA Foster Care Point of Contact will fill out the Education Impact Screener (EIS). The EIS will be shared with team members once completed. It will also be uploaded in Infinite Campus under the Documents tab.

TITLE IV, PART A – STUDENT SUPPORT AND ACADEMIC ENRICHMENT (ESSA: Sec. 4107)

Authorized in December 2015, the Student Support and Academic Enrichment (SSAE) grant is intended to improve students' academic achievement by increasing the capacity of States, LEAs, schools, and local communities to:

- provide all students with access to a well-rounded education,
- improve school conditions for student learning, and
- improve the use of technology in order to improve the academic achievement and digital literacy of all students. (ESEA section 4101)

Overview of Examples of Allowable SSAE Uses of Funds* **Overview of Allowable SSAE Program Activities**		
Well-Rounded Educational Opportunities (ESEA *section 4107)*	Safe and Healthy Students (ESEA *section 4108)*	Effective Use of Technology (ESEA *section 4109)*
• Improving access to foreign language instruction, arts, and music education • Supporting college and career counseling, including providing information on opportunities for financial aid through the early FAFSA • Providing programming to improve instruction and student engagement in science, technology, engineering and mathematics (STEM), including computer science, and increasing access to these subjects for underrepresented groups • Promoting access to accelerated learning opportunities including Advanced Placement (AP) and International Baccalaureate (IB) programs, dual or concurrents enrollment programs and early college high schools6 • Strengthening instruction in American history, civics, economics, geography, government education, and environmental education	• Promoting community and parent involvement in schools • Providing school-based mental health services and counseling • Promoting supportive school climates to reduce the use of exclusionary discipline and promoting supportive school discipline • Establishing or improving dropout prevention • Supporting re-entry programs and transition services for justice-involved youth • Implementing programs that support a healthy, active lifestyle (nutritional and physical education) • Implementing systems and practices to prevent bullying and harassment • Developing relationship building skills to help improve safety through the recognition and prevention of coercion, violence, or abuse • Establishing community partnerships	• Supporting high-quality professional development for educators, school leaders, and administrators to personalize learning and improve academic achievement • Building technological capacity and infrastructure • Carrying out innovative blended learning projects • Providing students in rural, remote, and underserved areas with the resources to benefit from high-quality digital learning opportunities • Delivering specialized or rigorous academic courses and curricula using technology, including digital learning technologies and assistive technology

An LEA that receives at least $30,000 in SSAE program funds must conduct a comprehensive needs assessment that includes, at a minimum, a focus on the three content areas identified above. (*ESEA* section 4106(d)).

Based on the results of that assessment, the LEA must use:

• At least 20 percent of funds for activities to support well-rounded educational opportunities (*ESEA* section 4107);

• At least 20 percent of funds for activities to support safe and healthy students (*ESEA* section 4108); and

• A portion of funds for activities to support effective use of technology (*ESEA* section 4109).

Within each of these areas, LEAs have broad flexibility to use the SSAE program funds for a variety of activities to improve student outcomes and address the opportunity gaps identified through the needs assessment.

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

The Rural Education Initiative (REI) is designed to assist rural school districts in using federal resources more effectively to improve the quality of instruction and student academic achievement.

Rural and Low-Income Schools Program (RLIS)
The RLIS program is an initiative that provides grant funds to rural LEAs that serve concentrations of children from low-income families. An LEA is eligible to receive funds under the RLIS program if:

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

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

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

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

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

TITLE III, Part A – LANGUAGE INSTRUCTION FOR ENGLISH LEARNERS (EL) AND IMMIGRANT (IMM) STUDENTS (ESSA: Sec. 3113)

Title III and English to Speakers of Other Languages (ESOL)

Purpose

The purpose of the state-funded ESOL program is to assist students to develop proficiency in the English language, including listening, speaking, reading, and writing, sufficient to perform effectively at the currently assigned grade level. The purpose of the federally-funded Title III supplemental program is to ensure that English learners (ELs) and immigrant students develop English proficiency and meet the same academic content and academic achievement standards that other children are expected to meet.

Student Assessment, Identification, and Enrollment Procedures

Parents/guardians of all students enrolling in the Troup County School System are surveyed via a Home Language Survey (HLS) to determine the student's first-learned, primary, and home language(s). For students with a language reported on the HLS other than or in addition to English, eligibility for ESOL services is determined using the Kindergarten WIDA ACCESS Placement Test (K-WAPT), WIDA Screener, or transfer records demonstrating current eligibility for language assistance services. ELs are assessed annually on the appropriate state-adopted English proficiency measure (ACCESS for ELSs 2.0, Kindergarten ACCESS for ELSs, or Alternate ACCESS) to determine continued eligibility or readiness to exit English language assistance services. The district notifies parents/guardians annually of their child's eligibility for ESOL. Such notification is made within the first thirty days of school for students continuing in the ESOL program and within two weeks of the date of eligibility determination for newly identified students. Parents/guardians have the right to decline ESOL services, as outlined in the annual notification. Upon their request, the ESOL teacher will contact the parents/guardians to ensure a clear understanding of the services offered and the educational implications of declining participation in the ESOL program. If the parents/guardians affirm their desire for their child be removed from the ESOL program, the school will provide a waiver form. Upon receipt of a signed parent waiver, the student will be removed from the ESOL program. The school must provide language assistance services through alternate means as outlined in the district procedures for indirect language assistance services. The student remains eligible for classroom and testing accommodations and must participate in the state-mandated annual English proficiency assessment until meeting exit criteria. Parents/guardians continue to be notified annually of their child's eligibility until such time that the student meets exit criteria, and a new waiver must be collected annually. At any time, the parents/guardians may request reinstatement of ESOL services for their child.

The Home Language Survey

- Is the purpose and use of the HLS clearly communicated to both families and those who administer the survey?
- Does the HLS elicit information about the student's current English abilities?
- Are the questions clear and understandable to those who administer the HLS? Translation of the Home Language Survey
- Is the HLS translated into the home languages of students, and parents and guardians, in the school and LEA?
- Are qualified oral interpreters available when needed to help families complete the HLS? Procedures for Administering, Interpreting, and Managing Results of the Home Language Survey
- Has a welcoming environment been established where the HLS is disseminated, made available, or administered?
- Are there standard and uniform procedures for administering and interpreting the HLS results?
- Do the procedures describe whose responsibility it is to administer the HLS, how it is to be done, and in what forms it should be administered (i.e., orally, written, in English, or in a home language translation)?
- Are there procedures to document and describe how to train the staff who will administer the HLS and how often refresher training will occur?
- Do procedures provide specific guidelines for interpreting HLS responses that include but are not limited to the following considerations: (a) Which responses indicate that a student will take an ELP placement test?; (b) How should responses be interpreted as a whole? and (c) What are the next steps if responses are unclear or contradictory?
- Do procedures include methods to record HLS results in the student's permanent records and to record the translation and interpretation needs of the EL's parents in the student information system?

- What is the continuous review process? Is there a process to gather feedback from parents and school personnel? Is there a process to revise the HLS, including piloting a new version as appropriate?

Step 1. **Identification of LEP Students: Home Language Survey**

A Home Language Survey is a district-developed tool (guided by federal and GaDOE) to be given to all entering students and used to identify students who may not be proficient in English. https://www.gadoe.org/Curriculum-Instruction-and-Assessment/Curriculum-and-Instruction/Pages/Home-Language-Survey.aspx

The Home Language Survey is designed to identify, for possible further evaluation:

- Students who communicate in a language other than English; or
- Students whose families use a primary language other than English in the home; or
- Students who use a language other than English in daily non-school surroundings; or
- Students who were not born in the United States. Note: Having another language spoken in the home or routinely used in other settings is not an automatic identification of a student as LEP/EL. The preliminary evaluation conducted in the next step determines the students who should be referred for placement in a language instruction educational program.

Step 2. **Evaluation of Prior Transcripts and Academic History**

If the student has previously been enrolled in a public school, staff will contact the previous school for an ACCESS or W-APT OR WIDA SCREENER score and ELD level for placement into the Troup County School System's (TCSS) ESOL Program. Students that transfer to TCSS from a WIDA state (found on the WIDA web site: www.wida.us) will use their ACCESS or W-APT OR WIDA SCREENER score and WIDA level for placement in the ESOL program. The student's academic history and transcripts will be screened thoroughly including:

- Academic records from within or outside the United States
- Course grades which, in relation to the student's grade level, indicate that lack of progress is due to limited
- English language acquisition
- Information on everyday classroom performance

Consideration of prior academic success and scholastic records will also be used to evaluate the need of ESOL.

Step 3. **Screener Evaluation for Instructional Placement**

If the Home Language Survey confirms that the student's home or primary language is other than English, the WIDA-ACCESS Placement Test, or W-APT will be used as the initial English language "screener." The W-APT/Screener score will be used to determine the initial placement for English language assessment and assist in determining the student's initial English language proficiency (ELP) level. The Kindergarten W-APT will be used for students enrolling in Kindergarten. This screening must take place within 10 (ten) school days of student enrollment.

NOTE: Georgia Department of Education (GDOE) requires the W-APT OR WIDA SCREENER to be administered only once per calendar year. TCSS uses the W-APT OR WIDA SCREENER (WIDA Access Placement Test) to determine if students are eligible for services. Students must fall into levels 1 - 5 to be eligible for services.

Additional documents needed in order to register in TCSS include:

- Parent ID
- Legal custody document (if student does not live with parents)
- Proof of address to determine if the student lives within the TCSS (one of the following):
- A utility bill with a TCSS address with the parent's name
- Birth certificate
- Immunization records

Other helpful information:

- Transcripts or report cards from prior schools
- IEP if the student has been identified as a child with disabilities. (504 Plans, SST records)

Social Security Numbers are NOT REQUIRED in TCSS.

The Code of Georgia states: It shall be unlawful for any agency to require an individual to disclose or furnish his social security account number not previously disclosed or furnished, for any purpose in connection with any activity, or to refuse any service, privilege or right to an individual wholly or partly because the individual does not disclose or furnish such number, unless the disclosure or furnishing of such number is specifically required by federal or state law. [COV, §2.2-3808. A.] In accordance with federal law, TCSS will not require that a student provide any proof of legal status such as a social security card, green card, or other proof of legal U.S. residency. (Note: this is NOT the same as proof of residency within the "District.")

Home Language Survey Procedures

The Home Language Survey elicits information regarding a student's native language, the language spoken most often by the student, and whether or not the student was born outside the United States. This information is used to initially identify students for the EL program. A separate HLS must be filled out for each student. For example, a parent who has three children must fill out three separate HLS forms.

The ESOL teacher works directly with the district's ESOL office and the school's registration clerk when new students enroll and indicate that English is not their primary language. The ESOL teacher checks the Home Language Survey and discusses the information that was listed on the Home Language Survey. The Office of Student Assignment and PreK personnel, and/or the ESOL teacher verifies that the student's parent or guardian understands the Home Language Survey and offers a translation of all of the registration forms if requested to do so. The ESOL teacher will coordinate efforts with the school's registration clerk to assist parent or guardian with the completion of all of the appropriate forms.

If the answer to any of the questions on the HLS indicates that the student's primary language is other than English, or if there is a language other than English spoken at home, the student should be referred to the

ESOL teacher for initial language assessment using the W-APT OR WIDA SCREENER to assess English language skills in all four domains: listening, speaking, reading and writing to determine if the student has limited English proficiency. (Note: Students in the first semester of Kindergarten are administered only the listening and speaking domains.)

The Home Language Survey should be kept in each student's permanent file regardless of whether or not the student is identified as an EL.

Administration of the Home Language Survey

1. When the parent or guardian begins the registration process for a new student, OSA and /PreK personnel presents the registration application, which includes a Home Language Survey in English and in the family's native language.

2. If the parent can understand but not read English, the clerk must obtain the information orally and assist the parent in filling out the form. A translated is scheduled to assist the family when needed.

3. The OSA/PREK personnel shall ensure that the HLS contains the student's identification number.

4. If there is any reason to question the accuracy of the responses on the HLS, verification shall be made by the ESOL Coordinator's staff or the ESOL teacher.

Use of the Completed Home Language Survey

1. The OSA/PREK must notify the ESOL Department if a new student has indicated that English is not the student's first language or the student was not born in the United States.

2. All students that indicated that English may not be their primary language will be evaluated for English proficiency to determine program placement.

3. All students that indicated that English may not be their primary language will be screened using the W-APT OR WIDA SCREENER (ACCESS screener) assessment to determine language proficient levels. (Students who were screened in other districts will not rescreened)

4. All ESOL student's test summary score sheets will be kept in the student's brown folder in the cumulative file.

English Language Proficiency Screening Report

The language proficiency assessment currently used in the TCSS is the WIDA ACCESS Placement Test or W-APT OR WIDA SCREENER. The W-APT OR WIDA SCREENER is a placement test which is used to assess the listening, speaking, reading, and writing abilities of newly-enrolled students within the first 30 days at the beginning of the year or 21 within 10 days of enrollment. The W-APT OR WIDA SCREENER is currently mandated statewide by the GA Department of Education.

1. The ESOL teacher administers and scores the test as soon as possible and no later than the 30th day after enrollment. The ESOL teacher will record the results in the student's personal language education plan and send a letter containing the results to the parents.

2. If the student's language proficiency is found to be limited in any one of the four domains as a result of W-APT or WIDA Screener testing, the student qualifies for services in the ESOL program. School personnel enter information about new LEP students into Infinite Campus(IC, and the data is transferred to the LEP database in IC for easy access to LEP information.

3. Parents are given the option to accept or refuse services when students qualify for ESOL services. If parents choose not to enroll their child in the ESOL Program, the ESOL teacher will ensure that parents who deny ESOL services to their child fully understand the consequences of such a decision. An interpreter will be used if needed.

4. The ESOL teacher is responsible for maintaining the student's official ESOL program record in the ESOL brown folder which is kept in a secure location. The following items will be placed in the ESOL program record. The contents of the ESOL folder should be monitored by principals or designee to ensure that required components have been placed in the folder. A checklist has been added to the forms section of this handbook to be used as a reference for principals as part of the ESOL teacher evaluations. (Brown Folder Checklist – Appendix A_)

Policy, procedures, and processes related to following standardized statewide entrance and exit procedures for identifying English Learners and Immigrant children and youth – ESEA: Sec. 3113

EL Services Provided

There is no specific legislation defining precisely what type of services must be provided to LEP students. However, Title III statues does direct school districts to provide high quality language instruction programs.

Title III Sec. 3115 (c) (1) legislation states: School districts will provide services designed to increase the English Language Proficiency of limited English Proficient children by providing high-quality language instruction educational programs that are based on scientifically based research demonstrating the effectiveness of the programs in increasing (A) English Proficiency and (B) student academic achievement in the core academic subjects.

Program Options for English Learners

The U.S. Department of Education, Office for Civil Rights requires districts to identify all of its ELs and provide them with equal and meaningful access to the educational programs offered by the district. Regarding segregation, it is mandated that ELs be assigned to the least segregated environment. Limited separation is allowable only when it is educationally justifiable (the benefits of the program outweigh the detrimental effects of segregation).

The ESOL program is designed to provide the assistance necessary for the students to succeed within the regular school curriculum. At both the middle and elementary school levels, ESOL instructors serve as advocates, making sure that EL's have the same educational opportunities as mainstream students. Instructors communicate daily with classroom teachers as they monitor student progress and support their language and academic learning. Our ESOL teachers communicate regularly with parents and often go above and beyond their call of duty as they offer services outside of the school day to ESOL families such as transportation to extra-curricular activities, health care appointments, summer school, and personal family outings.

Depending upon need, proficiency level, and content area of study, ESOL teachers work with students in individual or small group settings as well as working within the regular classroom in an inclusive setting. LEP students with very limited English proficiency will require much more English language instruction

than students at higher proficiency levels. Providing as much language instruction as possible at the lower proficiency levels will speed up the language acquisition process and ensure students are provided a solid foundation. Listening, speaking, reading, and writing skills are emphasized within the ESOL program. Great attention is given to academic vocabulary study within the content areas. General classroom teachers are given support and instructional strategies to assist ESOL students within the regular classroom. Both ESOL instructors as well as content area teachers are given professional development opportunities throughout the school year.

All ESOL students will have an accommodations plan that is developed by the ESOL teacher and other members of the LEP committee based upon the proficiency levels and the unique learning needs of each individual student. A copy of the plan will be shared and discussed with all teachers responsible for the academic growth of the student. The student's plan will be revised annually to address the academic growth and development needs of each student. A copy of the plan will be maintained in the student's permanent file.

Extra Curricular and Specialized Programs for English Learners

LEP students will receive appropriate exposure to the regular classroom's culture regardless of how much intensive ESOL services are provided. TCSS strives to place ELs in the regular classroom as much as possible in order to help them develop listening skills, adjust to a normal school routine and develop social relationships with their English-speaking peers. All ELs, including those with no English skills, should be fully integrated with other students from the onset as much as possible. While ELs need some time when they do not have to compete with native speakers, they also need to mix with fluent English speakers for at least a portion of the day. EL students will have equal access to all extra-curricular activities, trips, and assemblies. Schedules will allow ELs to participate with peers in age-appropriate mainstream elective classes such as art, technology, health, physical education, world languages, and vocational education in addition to core content classes.

Students are encouraged to participate in sports, clubs, chorus, and other extracurricular activities. Notices for all extra-curricular activities are sent home with ESOL students just as with peers. ESOL instructors are mindful to send translations of activity notices home with any student whose parents have requested translations. ESOL teachers act as advocates for those students who desire more information or additional assistance with registrations. ESOL instructors as well as other faculty and staff members are available to further discuss and answer questions that parents may have about after-school programs provided to students by the community such as scouts, boys and girls clubs, school clubs, parks and recreation sports, and 4-H programs.

The ESOL teacher and/or the mainstream teacher may at times recommend LEP students be evaluated for the Gifted-Talented Program. If the LEP student qualifies for the Gifted Program, they will participate fully with the division's other gifted students. The Gifted Program Director will be responsible for making an annual report at the end of each year to the ESOL Coordinator that identifies any and all LEP students who are served in the Gifted Education Program.

ESOL instructional models offered in TCSS are explained below:

Sheltering Instruction: Strategies for Classroom Teacher

The ESOL program model primarily used by Troup County Schools is content-based instruction. The curriculum for ESOL instruction is based on ELD standards and appropriate grade level content standards.

The regular classroom teacher will “shelter” the academic content for ESOL students while they are learning English. Sheltered instruction is the approach to teaching English language learners which integrates language and content instruction.

Listed below are ways a classroom teacher can shelter instruction for ESOL students in core content classes.

Visual Aids: Visual aids give ESOL students visual cues that may help clarify meaning and solidify learning.

Hands-On Activities: Hands-on activities help ESOL students connect with classroom content. Processes that can be experienced or observed make learning more concrete.

Sufficient Wait Time: ESOL students need additional time to formulate their answers in English. Some may still be translating their first language into English; others may need time to find the appropriate words. By pausing after a question is asked, everyone has time to think about the question before responding.

Model Spoken Language: Refrain from correcting students’ spoken language. Instead, model the proper usage in a restatement. For example, if a student says "No understand." You might reply, "You don't understand? Okay." Students may occasionally ask to be corrected; but as a rule, it is best to leave corrections to the written word. Be sure to balance positive feedback with corrections.

Lesson Outlines: Teacher-prepared outlines or notes can help ESOL students follow along in class. Alternately, you may ask another student to share his or her notes with the ESOL student. You may also choose to give the student information regarding the lesson plan and objectives so that they may have an easier time following along.

Skim and Scan: Directly teach ESOL students reading strategies that will enhance their reading skills. Skimming, scanning and even outlining chapters in the textbook are excellent pre-reading strategies that can help students preview material prior to reading. They can also engage in other strategies such as predicting chapter content from headings, creating vocabulary lists, writing responses, and summarizing.

Provide signals to call student’s attention to different lessons. Use such techniques as the location of the lesson, teacher posture, voice cues, and predictable schedules to mark the lesson’s boundaries.

Build consistency in classroom routines, lesson formats, and the language used within lessons. Familiarity with procedures frees English learners to concentrate on content.

Provide a balance between teacher-centered instruction, student group work, and independent work. Too much individual work will deprive students of necessary social interaction.

Encourage students to stretch beyond their comfort level. Give them opportunities to hear and use slightly more complex language.

Repeat, rephrase, paraphrase, and expand. Focus on communication.

Use real objects and models. Display photographs, pictures, charts, and posters. Use DVDs, and Internet sources.

Use authentic texts and language.

Show examples of completed work, projects, research papers, etc.

K-8 Pull Out Program: For pullout instruction, the LEP student leaves the mainstream classroom and is (“pulled out”) for ESOL services, working in small groups of instruction planned by the ESOL teacher.

Pullout services may vary between schools due to schedule and space availability, causing the pullout to be inside the classroom, rather than in a separate ESOL room, but ESOL teachers are not to be used as an assistant or tutor.

In kindergarten through eighth grade, students are pulled from regular classes for ESOL instruction. ELs may be grouped into ESOL classes by their English language proficiency level. When it is necessary to combine grade levels, students from lower grade levels are grouped together. Similarly, ELs in higher grade levels are grouped together for ESOL instruction. The length of time for ESOL instruction is dependent on the English language proficiency level of the student. Students who are more proficient may need less time in ESOL direct instruction.

Push-In Program: For push-in instruction, the LEP student remains in the mainstream classroom, with the ESOL teacher going in to work with the classroom teacher, providing appropriate instruction to the LEP student. To have a successful Co-teaching model, mainstream and ESOL teachers must have time to plan cooperatively and must share the teaching responsibilities of that classroom. ESOL teachers are not to be used as an assistant or tutor. Classroom time may be a mix of whole class, grouped lessons, or rotating stations with both teachers sharing the teaching role. Generally, in a Co-teaching model, ESOL teachers should be able to work with one to two mainstream teachers successfully. ESOL teachers may find working with three or more teachers in a co-teaching model very challenging since it can be difficult to find time to plan cooperatively.

In addition to frequent consultations with the classroom teacher, the ESOL teacher documents each EL's academic and linguistic progress on the student's plan which is the individual program record for each EL. The student's Education Plan will document each student's testing record to comply with Office for Civil Rights guidelines.

Secondary Level Program: High School age ESOL students will be enrolled in high school as long as they are under 21 years of age and meet the Troup County enrollment guidelines. High school ESOL students are encouraged to enroll in classes appropriate to their career and post-secondary education or work goals.

ESOL students will be considered for career and technology education courses in the same manner and criteria as all other students who express an interest in these courses. These courses are offered at the Troup County Career and Technical Education center as well as the four high schools. Enrollment is typically on a first come, first serve basis. The courses may be linked to having completed prior sequences, and may be limited by the number of sections allocated by the master schedules at each school.

Transcript Evaluation:

- The guidance counselor or a person trained in transcript evaluation will interview the student to determine the length of time the student will spend in each class per week. Course credit will be awarded according to the amount of credit awarded for contact hours in a week long period. Every effort will be made to find equivalent courses in order to ensure that the student may receive maximum credit for the courses he or she has taken previously.
- The student will be awarded appropriate science credit for classes in another country where science classes were combined (i.e. chemistry, biology, and physics classes). If the student did not attend these classes for the amount of time each week to receive credit for all three science classes, they will be given credit for biology and not given credit for chemistry or physics.
- Students may be awarded appropriate credit for social studies classes that are not equivalent to the social studies classes offered in Troup County Schools.

Troup County's general guidelines for LEP students at the high school level are as follows:

5. Course choices

- All students will be given encouragement and equal opportunity to pursue a high school diploma. Counselors will recognize that a lack of English language proficiency does not have any bearing on cognitive skills.
- The level of language proficiency will be considered in registering students for high school courses. More concrete courses with less language will be made available when feasible to students whose language level falls below the Bridging level.

6. Modification of Instruction and Assessment – All students will receive modifications from regular classroom teachers to make the curriculum accessible to them based on the LEP Plan.

7. Participation in Extracurricular Activities – All students will be encouraged to participate in extracurricular activities and every effort will be made to make students aware of activities and requirements.

8. ESOL teachers, counselors, and School Assistance teams will devise specific strategies for students who demonstrate signs that they are at risk for dropping out of school.

Exit Guidelines

According to GaDOE guidelines, a kindergarten student must score a Composite Proficiency Level (CPL) of 5.0 or higher, a Writing subscore of 4.5 or higher, and no other individual domain score less than 5.0 in order to exit the ESOL program. Students in grades 1-12 who score a CPL of 5.0 or higher are considered English proficient and are exited from English language assistance services in accordance with GaDOE guidelines. As allowable under State ESOL program guidelines, TCSS also elects to exit all students in grades 1-12 who achieve an overall score of 4.7-4.9 and to conduct classification Review meetings to determine readiness to exit for all students in grades 1-12 who score a CPL of 4.5 or 4.6. An ESOL teacher monitors each exited student's academic performance for two calendar years following exit from English language assistance services. If an exited student transfers to the district during the two-year period following attainment of English proficiency criteria, the student is monitored for the remainder of the two-year period. ESOL teachers further collaborate with regular education teachers when the data indicates students may be struggling in one or more areas. If needed, additional academic supports may be implemented through RTI. If a reasonable period of intervention and monitoring is unsuccessful and the student's difficulties appear to be related to English proficiency rather than academic deficits or disability, the RTI team may recommend considering re-designation to EL status with direct ESOL services. The district reviews and responds to the disaggregated data for Formerly EL students.

Funding

The Troup County School System receives direct funding for the Title III and ESOL programs to purchase instructional materials, provide professional learning, conduct parent outreach, and to hire the necessary personnel to ensure that the needs of English Learners (ELs) are met. Needs which cannot be met through the resources and funding available through local, state, and other federal funding sources are directed to the Executive Director of Exceptional Education and Student Support who is responsible for Title III and English Learner Support as it relates to the program and grant. Title III funds are utilized to meet these needs when appropriate and allowable.

Professional Learning

Every teacher of EL students, counselors, and administrators participate annually in job-embedded, ongoing professional learning relevant to ELs. The results of the annual comprehensive needs assessment guide school and district professional learning plans. ESOL teachers communicate students' current English Language Proficiency (ELP) scores to staff members and assist their colleagues with identifying appropriate scaffolding techniques and instructional strategies based on these scores.

Parent Outreach

The district carries out an annual Title III event for families of EL students to inform parents of ways to assist their students academically, including understanding English Language Proficiency (ELP) scores as well as other assessments in which their children participate and their implications. School programs, resources, and activities are also shared with parents in these meetings, and parents are provided an opportunity to provide feedback and input. Each school also plans and carries out additional family outreach events throughout the school year to further assist parents. Translators and Interpreters support schools' efforts to ensure that the activities are accessible to parents of English Learners who need assistance in another language. Rosetta Stone accounts and tutors are made available to parents of ELs who have a need and desire to improve their English proficiency in order to increase their capacity to help their children to succeed in school.

Upon registration, the district asks parents to indicate their preferred language for oral and written communications. To the extent practicable, communications are provided in the parent's preferred language. Resources available to assist with translations and interpretation include Language Line, a phone-based interpretation service with over 100 language options; a district translator/interpreter (Spanish); a district-maintained list of approved interpreters and translators (trained and vetted); and wireless interpretation equipment for use in large meetings (includes interpreter transmitters and parent headsets).

Supporting the Unique, Non-linguistic Needs of Immigrant Students

Immigrant students who qualify for English language assistance services are supported through the ESOL program. Regardless of English proficiency, immigrant students often arrive with myriad non-linguistic needs. Supplemental instructional materials and/or tutoring are provided to address academic gaps. Assistance with foreign transcript evaluation is provided to students entering with high school credits from another country. Counselors and social workers connect families with district- and community-based services to support non-academic needs such as health, counseling, food, housing, etc.

Program Evaluation and Accountability

The success of the ESOL instructional program and Title III supplemental programs and initiatives will be measured by analyzing the results of English Language Proficiency (ELP) assessments, academic assessments, and other available measures. As a result of this analysis, programmatic and instructional adjustments are implemented as appropriate. A biennial Title III program evaluation will be conducted and a report of findings completed. The report will describe the progress EL students have made in language acquisition and meeting specified annual content goals for EL subgroups, including ELs, monitored students, former ELs, and ELs with disabilities.

Parental Involvement

This section includes the provision describing involvement of parents of LEP students in their children's education:

ACCESSIBILITY– In carrying out the parental involvement requirements of this part, local educational agencies and schools, to the extent practicable, shall provide full opportunities for the participation of parents with limited English proficiency, parents with disabilities, and parents of migratory children, including providing information and school reports required under Section 1111 in a format and, to the extent practicable, in a language such parents understand. [(f)]

Translators and Interpreters

Whenever practicable, written translations of printed information must be provided to parents with limited English proficiency in a language they understand. However, if written translations are not practicable, it is practicable to provide information to limited English proficient parents orally in a language that they understand. SEAs and LEAs have flexibility in determining what mix of oral and written translation services may be necessary and reasonable for communicating the required information to parents with limited English proficiency. [Title I, Part A Final Regulations, 67 Fed. Reg. 71749 – 50, Comments and Discussion on Section 200.36; available at ED's website at http://www.ed.gov/legislation/FedRegister/finrule/2002-4/120202a.html.]

This requirement is consistent with Title VI of the Civil Rights Act of 1964 (Title VI), as amended, and it's implementing regulations. Under those regulations, recipients of Federal financial assistance have a responsibility to ensure meaningful access to their programs and activities by persons with limited English proficiency. It is also consistent with ED policy under Title VI and Executive Order 13166 (Improving Access to Services for Persons with Limited English Proficiency).

The Department of Justice's Guidance on Title VI and E.O. 13166, which provides clarification on how to determine an appropriate mix of language services, may be found in the Federal Register, 67 Fed. Reg. 41455-41472 (June 18, 2002), or online at http://www.lep.gov.

Communication with parents will be in a language they can understand when resources are available to provide written translations. The LEP Coordinator will be responsible for coordinating these translations and for providing schools with commonly used forms that have been translated.

Google Docs offers a feature that allows documents to be translated (with the click of a button) to another language, which is helpful for languages that are difficult in acquiring translation or for a quick turn-around of translation. Please see an ESOL administrator or contact Student Services, preferably a minimum of two weeks in advance, of any meeting requiring an interpreter. If an interpreter is available, this will be arranged and funded through division funds.

The parents' level of English proficiency may impact the degree to which they participate, even with an interpreter. Some parents may not ask questions, but may wait to be told what is important. Be sure to check and make sure that information is clear or that they are in agreement.

The Troup County School System will set as a goal the inclusion of information for parents and the community in various languages on the www.troup.org website. A language may be selected from the drop down menu. This information may include the school calendar, a parent guide to the schools, information about the promotion standards, and commonly used links to state and educational websites.

Legislation, Provisions and Requirements

The following section contains information regarding the identification, assessment, and education of LEP students as outlined in both Supreme Court decisions and federal legislation.

1. Title VI of the Civil Rights Act of 1964 Requirements

2. Elementary and Secondary Education Act of 1965 (ESEA)

3. May 25th Memorandum (1970)

4. Lau v. Nichols (1974)

5. Equal Educational Opportunities Act of 1974

6. Castañeda v. Pickard (1981)

7. Plyler v. Doe (1982)

8. Office of Civil Rights Title VI Policy Update (1991)

9. No Child Left Behind Act of 2001 (NCLB)

10. Every Student Succeeds Act of 2015 (ESSA)

11. Title I—Improving the Academic Achievement of the Disadvantaged

12. Title III—Language Instructions for Limited English Proficient and Immigrant Students

13. Dear Colleague Letter

LEGISLATION BRIEFLY EXPLAINED

1. Title VI of the Civil Rights Act of 1964 Section 601

According to Title VI of the Civil Rights Act of 1964, "No person in the United States shall, on the ground of race, color, or national origin, be excluded from participation in, be denied the benefits of, or be subjected to discrimination under any program or activity receiving Federal financial assistance." Courts have traditionally viewed "national origin" to include an individual's first language.

[*Pub*. L. 88-352, title VI, Sec. 601, July 2, 1964, 78 Stat. 25]

Title VI of the Civil Rights Act of 1964 "requires programs that educate children with limited English proficiency to be:"

- Based on a sound educational theory;
- Adequately supported, with adequate and effective staff and resources, so that the program has a realistic chance of success; and
- Periodically evaluated and, if necessary, revised.

Detailed information about Title VI of the Civil Rights Act of 1964 can be found here: http://www.ed.gov/about/offices/list/ocr/qa-ELs.html.

2. May 25th Memorandum (1970)

The purpose of this memorandum is to clarify Title VI of the Civil Rights Act of 1964 policy on issues concerning the responsibility of school districts to provide equal educational opportunity to national origin minority group children deficient in English language skills. If the inability to speak and understand the English language excludes national origin-minority group children from participation in the educational program offered by a school district, the district must take effective steps to rectify the language deficiency in order to open its instructional program to these students.

Detailed information about the May 25th Memorandum (1970) can be found here:

http://www2.ed.gov/about/offices/list/ocr/docs/lau1970.html

3. The *Lau v Nichols* Supreme Court Decision of 1974 requires that school divisions develop an effective language instruction program for English language learners (ELSs) to attain English proficiency and provide them the opportunity to fully and meaningfully participate in the same academic curriculum as all students.

Lau v. Nichols was a class action suit brought by parents of non-English-proficient Chinese students against the San Francisco Unified School District. In 1974, the Supreme Court ruled that identical education does not constitute equal education under the Civil Rights Act of 1964. The court ruled that the district must take affirmative steps to overcome educational barriers faced by the non-English speaking Chinese students in the district. [414 U.S. 563 (1974)]

Detailed information about the Lau v Nichols can be found here:

http://www2.ed.gov/about/offices/list/ocr/ELs/lau.html

4. Equal Educational Opportunities Act of 1974 requires school districts to have procedures in place to identify potential EL students in an accurate and timely manner. School districts must then determine if potential EL students are in fact EL through a valid and reliable test that assesses English language proficiency in speaking, listening, reading and writing**.** EL students are entitled to appropriate language services to become proficient in English and to participate equally in the standard instructional program within a reasonable period of time, as well as extracurricular programs and activities. EL students are entitled to EL programs with sufficient resources and districts must have qualified EL teachers, staff, and administrators to effectively implement their EL program. Districts must also monitor the progress of EL students, evaluate the effectiveness of their EL programs, and modify their programs in a timely manner when needed.

Detailed information about the Equal Educational Opportunities Act of 1974 can be found here:

http://www2.ed.gov/about/offices/list/ocr/ELs/edlite-glossary.html#eeoa

5. Castañeda v. Pickard (1981) court case issued by the Fifth Circuit Court that established a three-part test to evaluate the adequacy of a district's program for LEP students: (1) is the program based on an educational theory recognized as sound by some experts in the field or is considered by experts as a legitimate experimental strategy; (2) are the programs and practices, including resources and personnel, reasonably calculated to implement this theory effectively; and (3) does the school district evaluate its programs and make adjustments where needed to ensure language barriers are actually being overcome? [648 F.2d 989 (5th Cir., 1981)]

Detailed information about the Castañeda v. Pickard can be found here:

http://www.ed.gov/about/offices/list/ocr/ELs/edlite-glossary.html.

6. Plyler v. Doe (1982) court case held that a Texas statute which withholds from local school districts any state funds for the education of children who were not "legally admitted" into the United States, and which authorizes local school districts to deny enrollment to such children, violates the Equal Protection Clause of the Fourteenth Amendment.

Detailed information about Plyler v. Doe can be found here:

http://supreme.justia.com/us/457/202/case.html.

7. Office of Civil Rights Title VI Policy Update (1991)-- On September 27, 1991, the Office of Civil Rights issued a policy update to provide guidance regarding Lau compliance reviews to determine whether schools are complying with their obligation under the regulation implementing Title VI of the Civil Rights Act of 1964 to provide any alternative language programs necessary to ensure that national origin minority students with limited English proficiency (LEP students) have meaningful access to the schools' programs.

Detailed information about the OCR Title VI Policy Update (1991) can be found here:

http://www.ed.gov/about/offices/list/ocr/docs/lau1991.html.

8. Every Student Succeeds Act 2015 (ESSA)—listed below are some of the mandates related to ELSs:

- Using multiple measures instead of only standardized tests to track improvement
- Increased state accountability for ELSs
- Continued commitment of federal funding for ELSs
- Required reporting not only for newer ELSs, but long-term ELSs as well
- Required reporting for ELSs with special needs
- Exclusion from testing for newcomers for a short time
- Inclusion in reporting for ELSs 4 years after they are exited from ESOL services
- Detailed information about the Every Student Succeeds Act can be found here:
- https://www.ed.gov/esea

TITLE II, PART A – SUPPORTING EFFECTIVE INSTRUCTION (ESSA: Sec. 2104(a)(1); 2 C.F.R. 200.301; 2 C.F.R 200.328(a)

The purpose of the Title II, Part A grant is -

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

Every Student Succeeds Act
ESSA Title II, Part A LEA Use of Funds and Title VIII Definitions
Section 2103 [20 USC 6613] Local Uses of Funds

Authorized Use of Funds #1

(A) Developing or improving a rigorous, transparent, and fair evaluation and support system for teachers, principals, or other school leaders that

(i) is based in part on evidence of student achievement, which may include student growth; and
(ii) shall include multiple measures of educator performance and provide clear, timely, and useful feedback to teachers, principals, or other school leaders.

Authorized Use of Funds #2

(B) Developing and implementing initiatives to assist in recruiting, hiring, and retaining effective teachers, particularly in low-income schools with high percentages of ineffective teachers and high percentages of students who do not meet the challenging State academic standards, to improve within district equity in the distribution of teachers, consistent with section 1111(g)(1)(B), such as initiatives that provide
(i) expert help in screening candidates and enabling early hiring;
(ii) differential and incentive pay for teachers, principals, or other school leaders in high-need academic subject areas and specialty areas, which may include performance-based pay systems;
(iii) teacher, paraprofessional, principal, or other school leader advancement and professional growth, and an emphasis on leadership opportunities, multiple career paths, and pay differentiation;
(iv) new teacher, principal, or other school leader induction and mentoring programs that are designed to
(I) improve classroom instruction and student learning and achievement; and
(II) increase the retention of effective teachers, principals, or other school leaders;
(v) the development and provision of training for school leaders, coaches, mentors, and evaluators on how accurately to differentiate performance, provide useful feedback, and use evaluation results to inform decision making about professional development, improvement strategies, and personnel decisions; and
(vi) a system for auditing the quality of evaluation and support systems.

Authorized Use of Funds #3

(C) Recruiting qualified individuals from other fields to become teachers, principals, or other school leaders, including mid-career professionals from other occupations, former military personnel, and recent graduates of institutions of higher education with records of academic distinction who demonstrate potential to become effective teachers, principals, or other school leaders.

Authorized Use of Funds #4

(D) Reducing class size to a level that is evidence based, to the extent the State (in consultation with local educational agencies in the State) determines that such evidence is reasonably available, to improve student achievement through the recruiting and hiring of additional effective teachers.

Authorized Use of Funds #5

(E) Providing high-quality, personalized professional development that is evidence-based, to the extent the State (in consultation with local educational agencies in the State) determines that such evidence is reasonably available, for teachers, instructional leadership teams, principals, or other school leaders, that is focused on improving teaching and student learning and achievement, including supporting efforts to train teachers, principals, or other school leaders to
(i) effectively integrate technology into curricula and instruction (including education about the harms of copyright piracy);
(ii) use data to improve student achievement and understand how to ensure individual student privacy is protected, as required under section 444 of the General Education Provisions Act (commonly known as the "Family Educational Rights and Privacy Act of 1974") (20 U.S.C. 1232g) and State and local policies and laws in the use of such data;
(iii) effectively engage parents, families, and community partners, and coordinate services between school and community;
(iv) help all students develop the skills essential for learning readiness and academic success;
(v) develop policy with school, local educational agency, community, or State leaders; and
(vi) participate in opportunities for experiential learning through observation.

Authorized Use of Funds #6

(F) developing programs and activities that increase the ability of teachers to effectively teach children with disabilities, including children with significant cognitive disabilities, and English learners, which may include the use of multi-tier systems of support and positive behavioral intervention and supports, so that such children with disabilities and English learners can meet the challenging State academic standards.

Authorized Use of Funds #7

(G) Providing programs and activities to increase
(i) the knowledge base of teachers, principals, or other school leaders on instruction in the early grades and on strategies to measure whether young children are progressing; and
(ii) the ability of principals or other school leaders to support teachers, teacher leaders, early childhood educators, and other professionals to meet the needs of students through age 8, which may include providing joint professional learning and planning activities for school staff and educators in preschool programs that address the transition to elementary school.

Authorized Use of Funds #8

(H) Providing training, technical assistance, and capacity-building in local educational agencies to assist teachers, principals, or other school leaders with selecting and implementing formative assessments, designing classroom-based assessments, and using data from such assessments to improve instruction and student academic achievement, which may include providing additional time for teachers to review student data and respond, as appropriate.

Authorized Use of Funds #9

(I) Carrying out in-service training for school personnel in
(i) the techniques and supports needed to help educators understand when and how to refer students affected by trauma, and children with, or at risk of, mental illness;
(ii) the use of referral mechanisms that effectively link such children to appropriate treatment and intervention services in the school and in the community, where appropriate;
(iii) forming partnerships between school-based mental health programs and public or private mental health organizations; and

(iv) addressing issues related to school conditions for student learning, such as safety, peer interaction, drug and alcohol abuse, and chronic absenteeism.

Authorized Use of Funds #10

(J) Providing training to support the identification of students who are gifted and talented, including high-ability students who have not been formally identified for gifted education services, and implementing instructional practices that support the education of such students, such as
(i) early entrance to kindergarten;
(ii) enrichment, acceleration, and curriculum compacting activities; and
(iii) dual or concurrent enrollment programs in secondary school and postsecondary education.

Authorized Use of Funds #11

(K) Supporting the instructional services provided by effective school library programs.

Authorized Use of Funds #12

(L) Providing training for all school personnel, including teachers, principals, other school leaders, specialized instructional support personnel, and paraprofessionals, regarding how to prevent and recognize child sexual abuse.

Authorized Use of Funds #13

(M) Developing and providing professional development and other comprehensive systems of support for teachers, principals, or other school leaders to promote high-quality instruction and instructional leadership in science, technology, engineering, and mathematics subjects, including computer science.

Authorized Use of Funds #14

(N) Developing feedback mechanisms to improve school working conditions, including through periodically and publicly reporting results of educator support and working conditions feedback.

Authorized Use of Funds #15

(O) providing high-quality professional development for teachers, principals, or other school leaders on effective strategies to integrate rigorous academic content, career and technical education, and work-based learning (if appropriate), which may include providing common planning time, to help prepare students for postsecondary education and the workforce.

Equity Action Plan

The Troup County School System Equity Action Plan is revised annually and included in the LEA S-CLIP submission.

The LEA Equity Action Plan Template follows these steps:

- Review of LEA Data
- Choosing Equity Interventions

-LEAs select equity interventions based on identified needs.

- Equity Interventions for Reducing LEA Equity Gaps

-LEAs describe how the selected equity intervention will be implemented, monitored, and measured for effectiveness in the current fiscal year.

TITLE I, PART C – EDUCATION OF MIGRATORY CHILDREN (MEP) SERVICES (ESSA: Sec. 1301(2); Sec. 1304(b)(3); Sec. 1308(b)(1)-(3)

A child is a "migratory child" if the following conditions are met:

1. The child is not older than 21 years of age; *and*
2. The child is entitled to a free public education (through grade 12) under State law, *or* the child is not yet at a grade level at which the LEA provides a free public education, *and*
3. The child made a qualifying move in the preceding 36 months as a migratory agricultural worker or a migratory fisher, or did so with, or to join a parent/guardian or spouse who is a migratory agricultural worker or a migratory fisher; *and*
4. The child moved due to economic necessity from one residence to another residence, and from one school district to another.

The Troup County School System is part of the MEP consortium.

All school districts in Georgia (MEP direct funded or MEP consortium districts and all charter schools) must use the Occupational Survey during back-to-school registration for returning students and new student registration during the year. This survey is a fundamental component of the ID&R process at the district level.

The Troup County School System identifies potential migrant students through this occupational survey, which is included in the online student registration process through the TCSS student information system (Infinite Campus). When a family checks "yes" on questions 1 and 2 of the Occupational Survey, the Director of Federal Programs receives an email notification. These emails are kept in a digital folder. A report will be generated from the student information system for families who checked "yes" on the survey. This report will be send to the GaDOE Region 2 MEP Office to check for eligibility.

In Georgia, the GaDOE will always make eligibility determinations. School districts are notified of the arrival and confirmation of eligible migrant children or youth in two ways:

- A copy of the Certificate of Eligibility (COE) is mailed
- Updated migrant reports are loaded to the portal

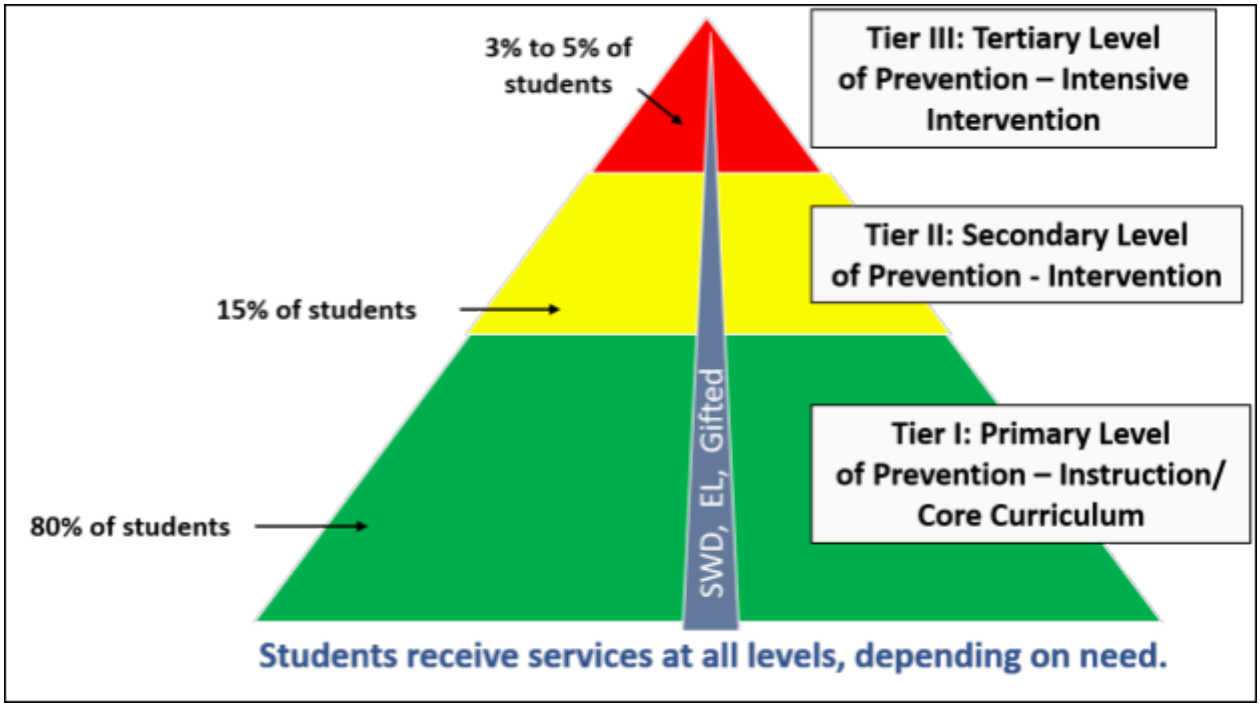
Additionally, regional consortium staff make frequent contact with school districts and review current enrollments.

When a student is identified as migrant, the grant director flags the student as migrant in the student information system (Infinite Campus) and informs the school. There is regular communication between schools, the district, and migrant staff. Student records and reports are sent to migrant staff regularly.

IDEA Procedures

STUDENT SUPPORT TEAM (SST) (STATE BOARD RULE: 160-4-2-.32)

Prior to a student being referred for evaluation for Exceptional education eligibility, the student goes through various levels, or tiers, through the ***Response to Intervention*** **Pyramid (RTI)/ Multi- Tier System of Support (MTSS)**. The major focus for all Tiers is prevention.



Tier 1 includes evidence-based instruction which is based on the Georgia Standards of Excellence. It includes differentiated instruction to promote higher levels of student engagement and achievement as well as effective school-wide behavior supports. Tier II prevention strategies are used outside of the time dedicated to the core instruction in Tier I. These strategies are usually delivered to small groups of students in an effort to provide opportunities to practice and learn skills taught in the core. If students are not making the expected levels of progress in Tier II, they are referred to the Student Support Team (SST) at Tier III. Students at Tier III have a hearing and vision screening completed by the school nurse or trained staff member.

The SST Process includes the following steps:

1. Identification of learning and or behavior problems.
2. Assessment, if necessary
3. Educational Plan
4. Implementation
5. Follow up and Support
6. Continuous monitoring and evaluation

SST Documentation included the following information:

1. Student's name
2. Names of team members.
3. Meeting dates
4. Identification of student learning and/ or behavior problems
5. Any records of assessment
6. Educational plan and implementation results
7. Follow-up and, as appropriate, continuous evaluation

The Student Support Team includes, **at a minimum**, the **referring teacher and at least two of the following participants**, as appropriate to the needs of the student:

1. Principal
2. General education teacher
3. Counselor
4. Lead teacher
5. School psychologist
6. Subject area specialist
7. ESOL teacher
8. Exceptional education teacher
9. School social worker
10. Central office personnel
11. Section 504 coordinator
12. Other appropriate personnel

Parents/guardians are invited to participate in all meetings of their child's Student Support Team and in the development of interventions for their child.

The team will meet at prescribed intervals to review progress monitoring toward interventions, to devise more, or revise, original strategies.

Minutes of each meeting along with outcomes of interventions and plans for the next strategies are kept.

Documentation of Tier II and Tier III interventions, along with Progress Monitoring results, are included in the referral packet if a child is referred for Exceptional education Eligibility consideration.

All student referrals are preceded by evidenced-based academic and/or behavioral interventions and the monitoring of progress. Before a referral for exceptional education evaluation can be made, documentation that the school has attempted reasonable interventions and the amount of progress being made will not close the achievement gap.

The referral for evaluation is then made in order to determine if physical, emotional, and/or academic problems may have an educational impact.

The only time an exception will be made is when it is clear that there is no research based intervention for the area being considered. Examples, but not limited to- Blind, Severe or Profound Intellectual Disability.

CHILD FIND PROCEDURES (STATE BOARD RULE: 160-4-70.03)

The purpose of **Child Find** procedures is to identify, locate, and evaluate children and youth, birth to age 21, who are suspected of, or have a disability or developmental delay. TCSS serves children ages 3 through 21 with identified exceptional education needs. Child Find activities are announced in local newspapers, on the system website, and through other local sources throughout the year in order to identify suspected children with disabilities. This includes those children who are:

children enrolled in the LEA

children ages 3-5 (who may not be enrolled in a Georgia- funded prekindergarten and kindergarten, including children who are parentally placed in private preschools or daycare centers outside the LEA)

highly mobile including migrant, homeless and wards of the state

wards of the State

detained or incarcerated in jails or correctional facilities operated by local sheriff offices

children who are attending charter schools within the district

children who are served in rehab centers, daycare centers, etc.

parentally-placed in private schools within the school system (including religious, elementary and secondary schools)

home school/study programs

regardless of the severity of their disability, and who are in need of exceptional education and related services, are identified and evaluated.

A **referral** may be made by anyone who has a concern about a child's development. All referrals are considered confidential. (The parent retains the right to refuse services.)
Children may be referred by any of the following:

Parents/legal guardians/foster parents

Physicians/health care providers

Preschool programs

School system personnel

Community agencies

Private school personnel

Others who are concerned about a child's development

Prior to any possible referral to exceptional education, any screening of a child by a teacher or specialist to determine appropriate **instructional strategies and interventions** for curriculum implementation shall not be considered to be an evaluation for eligibility for exceptional education and related services, but will aid in the decision-making process.

A child should be **referred** when:

A health or medical disorder interferes with development or learning.

A child seems to have difficulty seeing or hearing.

A child appears to have social, emotional or behavioral difficulties that affect his/her ability to learn.

A child has diagnosed progressive or degenerative condition that will eventually impair or impede the child's ability to learn.

A child seems to have difficulty understanding directions like others that are his/her age.

A child's speech is not understandable to family or friends, including stuttering

A child has difficulty with reading, math, or other school subjects.

Student referrals must be accompanied by documentation of scientific research or evidence based academic and/or behavioral interventions that have been implemented as designed for the appropriate period of time to show effect or lack of effect that demonstrates the child is not making sufficient rate of progress. Exceptions may be made in circumstances where immediate evaluation and/or placement is required due to a significant disability that precludes access to instruction; however, exceptions are an infrequent and rare occurrence, and the circumstances evidencing the need for the local education agencies use of the exception will be clearly documented in the eligibility decision.

Transition for Children Birth through Two – Part C

In the case of a child, birth through age 2, who was previously served under Babies Can't Wait, an invitation to the initial IEP Team meeting must, at the request of the parent, be sent to the Babies Can't Wait service coordinator or other representatives of Babies Can't Wait to assist with the smooth transition of services.

THE INDIVIDUAL FAMILY SERVICE PLAN

The process of developing the Individualized Family Service Plan (IFSP) is similar to that of developing an IEP in that the child's needs and services are determined on an individual basis. Babies Can't Wait provides service coordination to children birth through age 3 an IFSP who have been identified with a disability. However, in addition to the related services provided in Part B, the IFSP also includes family support services, nutrition services, and case management.

Professional Learning: Annually training will be provided to stakeholders in order to maintain continuity of practices and procedure and to ensure compliance and accountability.

Monitoring the Implementation: Annually each school will participate in an IDEA Procedure Review.

Technical Assistance: If areas of concern are noted during the IDEA Procedure Review a plan for technical assistance will be developed. The plan can include TKES and LKES documentation, as well as professional learning.

EVALUATIONS AND REEVALUATIONS (State Board Rule: 160-4-7-.04)

A **referral to Exceptional education** is made through the RTI/SST process listed above.

Referral for TIER 4 Evaluation (Initial Evaluations)

- The TIER 3 team may refer a student for TIER 4 consideration if:
  - The student's performance and Growth rate remains below that of average students on the appropriate instructional level as determined by the team.
  - If a student is making no progress or declining after 9-12 weeks with TIER 3 Interventions.
    - Note: 12 weeks of interventions/data points must be considered for a student to be found eligible for SLD. The key consideration for other areas of eligibility is whether or not the intervention(s) has been given a reasonable amount of time to be effective.
  - **While awaiting evaluation results, TIER 3 interventions and Progress Monitoring for the student should continue.**
- A Meeting should be held with Tier 3 and Tier 4 Teachers present to explain the evaluation process to parents and answer any questions they may have.
  - **NOTE: Student must have passed a hearing and vision screening and all pertinent documents should be collected prior to signing consent to evaluate.**
  - When the team makes a referral for a TIER 4 evaluation the Initial Evaluation checklist should be completed. The RTI Chair is responsible for gathering all items above "Parent consent to Evaluate". Tier 4 will obtain Consent to Evaluate and Review Parental Rights with the parent/guardians.
  - Tier 4 will scan and upload consent to evaluate to IC the same day signatures are obtained and email appropriate records clerk at EEC that consent to evaluate has been obtained.
- Parents and teachers will be given rating form protocols to complete. Best practice would be to assist the parents and/or teacher with completion of rating form protocols if necessary.
- The remainder of the items from the Initial Evaluation Checklist should then be gathered and **the folder should arrive at EEC within 7 days of signing consent (arrived at EEC/not placed in courier)**. There is a critical 60 day window for the evaluation to be completed so time is an important factor to consider.
- Following the evaluation, an eligibility meeting will be held. The RTI chair will assist the Tier 4 chair in completion of the eligibility reports.
  - Start the eligibility report and complete sections 1-5 prior to eligibility meeting:
    - Demographics
    - Case History
    - Summary of Interventions
    - Progress monitoring of interventions
    - Results of district, state, benchmark assessments
  - If the student is found ineligible, the recommendations from the Eligibility Report will serve as a guideline for future teachers of the student and should also include strategies that might work well with the student. Eligibility folders should be returned to EEC in a timely manner. 6
- If a child's parents decide they do not want their child evaluated after having signed consent then the Ex Ed Teacher should have the parents sign new consent to evaluate form designating that they do not give permission to test.
  - TIER 3 chairs should place a copy of this form in the SST folder for documentation purposes. B
- TIER 4 Referral Forms and Documents:
  - Initial Evaluation Checklist
  - Teacher Observation Form
  - Work Sample Checklist

Parent Request for TIER 4 evaluation for special education eligibility:

- If at any time, a parent makes a request for a special education evaluation or requests that their child receive special education services:
    - Have the RtI Chair make a copy of the request and send to Director of Ex Ed and the assigned RtI Facilitator.
    - All requests must be in writing. Make parents aware of the need for written request when they make a verbal request.
- The written request must be sent to EEC as soon as possible. Parent request meetings should be held within 14 working days of school's receipt of the request.
- RtI Facilitator will coordinate with necessary EEC personnel and send 3 potential meeting dates/times to the school to schedule meeting. The school will verify that the parent/guardians are available to attend during one of those dates. The RTI Chair should send home a formal meeting notification once date/time has been set.
- The meeting MUST include parent/guardian, School Admin, School Tier 3 chair, Classroom Teacher, RtI Facilitator, and any other personnel as needed.
- The Tier 3 chair should complete "Parent Request Meeting" Form and have team members sign off. ***The signed parent request meeting form should be scanned and uploaded into the documents section of SST in Infinite Campus***

**A request for an evaluation automatically places a student in TIER 3*. At this point, the student also falls under Child Find and the protections it affords

If the parents of a child referred for exceptional education evaluation refuse to give written consent for initial evaluation TCSS may, but is not required to, continue to pursue the evaluation by using due process procedures or mediation procedures

Once the signed *Consent for Evaluation* form is received, the evaluation process will be completed in no later than 60 calendar days.
Students who turn three during the summer period or other holiday periods must have an eligibility decision and IEP (if appropriate) in place by the third birthday.

The time frame described above does not apply if:

1. The parent of a child repeatedly fails or refuses to produce the child for the evaluation; or
2. A child enrolls in a school of another school system after the relevant timeline has begun, and prior to a determination by the child's previous school system as to whether the child is a child with a disability. The exception applies only if the subsequent school system is making sufficient progress to ensure a prompt completion of the evaluation and the parent and subsequent school system have agreed to a specific time when the evaluation will be completed.
3. If extenuating circumstances, e.g., illness, unusual evaluation needs, or revocation of parent's consent for evaluation affect this timeline, TCSS will document the exceptions.

Any summer vacation period when the majority of the LEA's teachers are not under contract does not count toward the 60-day time period.

Exceptional education Referral Process: Preschool-Aged Students

Preschool-aged children (aged 3-5) may be referred for exceptional education evaluation by any person (such as parents, school personnel, local pediatricians and other medical staff, audiologists, parents, and/or staff from private preschools or daycares, Head Start, Pre-K, Health Department, Family and Children's Services and Early Intervention/Babies Can't Wait).

Individuals making referrals for exceptional education evaluation may contact any Preschool Exceptional education staff member, the District Special Needs Supervisor, Pre-K Coordinator or the Director of Student Services and Supports. If the child is transitioning from the *Babies Can't Wait* program, the contact will be made to the District Special Needs Supervisor.

Pre-school Referral Procedures:

For *Babies Can't Wait* Referrals:

Preschool Team Leader receives notification of referral from *Babies Can't Wait* (BCW) office

Preschool Team Leader enters the notification date on BCW timeline sheet;

Preschool Team Leader is contacted by BCW Coordinator to schedule transition meeting;

Preschool Team Leader enters the transition date on BCW timeline sheet;

At transition meeting

- Hearing/vision screens are scheduled
- Parental information needed for Eligibility Report is obtained (parental concerns, developmental milestones, medical information, etc.)
- Parental information needed for "Pre-Enrollment" (complete student name DOB, gender, and ethnicity) is obtained
- Evaluation is scheduled

Parent signs the *Consent to Evaluate* form before the evaluation

Team evaluation (most often including exceptional education teacher, Speech/Language Pathologist, general education "teacher," and parent) occurs;

Eligibility/IEP meeting is scheduled upon completion of evaluation,

Central Office Registration Clerk is notified as to whether child is/is not eligible to receive services;

Eligibility for Exceptional education status/dates is recorded on the BCW Timeline Sheet

For Parent and Community Referrals:

Designated Preschool Facilitator meets with parent to discuss parental concerns (also obtain other info needed for Eligibility Report: medical information, developmental milestones, sensory issues; developmental history). Interventions will be provided to parent to implement during the evaluation process.

"Pre-Enrollment" information is requested from parent (complete name of student, DOB, address, gender, and ethnicity);

Vision/hearing screens are scheduled;

Evaluation date/time is scheduled;

Permission to Evaluate is signed before evaluation;

Team evaluation occurs (most often including exceptional education teacher, Speech/Language Pathologist, and parent);

Eligibility/IEP meeting is scheduled;

EEC Data Clerk is notified whether child is/is not eligible to receive services;

Student information is recorded in Infinite Campus indicating whether or not student is eligible for exceptional education services.

For TCSS Pre-K Teacher Referrals:

- Teacher follows all RTI procedures as laid out in the TCSS manual.

Initial Evaluations

TCSS conducts a **full and individual initial evaluation** before the initial provision of exceptional education and related services to a child with a disability. In conducting an evaluation, TCSS:

1. Uses a variety of evaluation tools and strategies to gather relevant academic, functional and developmental information about the child, including information provided by the parents that may assist in determining whether the child is a child with a disability; and the content of the child's individualized education program including information related to enabling the child to be involved in and progress in the general curriculum (or for a preschool child to participate in appropriate activities);
2. Does not use any single procedure as the sole criterion for determining whether a child is a child with a disability and for determining an appropriate educational program for the child;
3. Uses technically sound instruments that may assess the relative contribution of cognitive and behavioral factors, in addition to physical or developmental factors assessments and other evaluation materials used in the TCSS to assess a child under this section:
   (i) Are selected and administered so as not to be discriminatory on a racial or cultural basis;
   (ii) Are provided and administered in the child's native language or other mode of communication and in the form most likely to yield accurate information on what the child knows and can do academically, developmentally, and functionally, unless it is clearly not feasible to so provide or administer;
   (iii) Are used for the purposes for which the evaluations or measures are valid and reliable;
   (iv) Are administered by trained and knowledgeable personnel; and
   (v) Are administered in accordance with any instructions provided by the producer of the assessments.
4. The child is assessed in all areas related to the suspected disability, including, if appropriate, health, vision, hearing, social and emotional status, general intelligence,

academic performance, communicative status, and motor abilities. Evaluation tools and strategies are used which provide relevant information that directly assists persons in determining the educational needs of the child. Assessments and other evaluation materials include those tailored to assess specific areas of educational need and not merely those which are designed to provide a single general intelligence quotient.

5. Assessment selection and administration is such that, when administered to a child with impaired sensory, manual or speaking skills, the results accurately reflect the child's aptitude or achievement level, or whatever other factors the assessment purports to measure, rather than reflecting the child's impaired sensory, manual or speaking skills, except where those skills are the factors which the assessment purports to measure.
6. If an evaluation is not conducted under standard conditions, a description of the extent to which it varied from standard conditions, i.e., the qualifications of the person administering the test or the method of test administration must be included in the evaluation report.
7. In evaluating each child with a disability, the evaluation shall be sufficiently comprehensive to identify all of the child's exceptional education and related services needs, whether or not commonly linked to the disability category in which the child has been classified.
8. Evaluations of children with disabilities who **transfer** to the TCSS in the same school year are coordinated with the child's prior and subsequent schools, as necessary and expeditiously as possible, to ensure prompt completion of full evaluations.
9. A qualified psychological examiner evaluates referred children who require a psychological and/or clinical evaluation.

Qualified Psychological Examiner Requirements

Initial evaluation results used for consideration of eligibility for exceptional education, if not provided by a school psychologist with a valid S-5 (or higher) certificate in school psychology, shall be from one of the following:

(I) A psychologist licensed by the Georgia Board of Examiners of Psychologists and having training and experience in school psychology or child clinical psychology.

(II) A full-time graduate student in an approved, properly supervised school psychology or child clinical psychology training program internship/practicum, who has completed a minimum of one year of approved appropriate graduate training.

(III) A Georgia Merit System employee who has a classification rating of psychologist, senior psychologist, or psychology program specialist.

Additional Requirements

As part of the evaluation process, the team will review all existing evaluation data such as evaluations and information provided by the parents of the child, current classroom- based, local, or State assessments and classroom-based observations. On the basis of that review and input from the child's parents, the evaluation team will identify what additional data, if any, are needed to determine:

1. Whether the child is a child with a disability and the educational needs of the child, or in case of a reevaluation of a child, whether the child continues to have such a disability and the educational needs of the child;
2. The present levels of academic achievement and related developmental needs of the child;
3. Whether the child needs exceptional education and related services, or in the case of a reevaluation of a child, whether the child continues to need exceptional education and

related services; and

4. Whether any additions or modifications to the exceptional education and related services are needed to enable the child to meet the measurable annual goals set out in the IEP of the child and to participate, as appropriate, in the general curriculum.
   (c) The parent and other qualified professionals may conduct its review without a meeting.
   (d) The TCSS must administer such assessments and other evaluation measures as may be needed to produce the data identified.
   (e) Requirements if additional data are not needed-
      1. If the IEP Team and other qualified professionals, as appropriate, determine that no additional data are needed to determine whether the child continues to be a child with a disability and to determine the child's educational needs, TCSS: (i) Must notify the child's parents of that determination and the reasons for it and notify the parents of the right to request an evaluation to determine whether the child continues to be a child with a disability and to determine the child's educational needs; (ii) Is not required to conduct such an evaluation to determine whether the child continues to be a child with a disability unless requested by the child's parents.
         (f) Evaluations before change in eligibility. The TCSS must evaluate a child with a disability before determining that the child is no longer a child with a disability.

The evaluation is not required before termination of a child's disability due to graduation from high school with a regular education diploma, or due to exceeding the age eligibility for a free and appropriate public education (FAPE). However, we will provide the child with a summary of the child's academic achievement and functional performance (Summary of Performance)**,** which shall include recommendations and resources to assist the child in meeting the child's post-secondary goals.

Troup County Exceptional Education Initial Evaluation Procedures

- The Special Education personnel will attend Tier III meetings when the team is considering referring a student for an initial evaluation.
  - Special Education personnel provides explanation of parental rights and evaluation procedures which include a variety of evaluation tools administered by trained and knowledgeable staff along with a review of existing data.
  - Parent will acknowledge receipt of parental rights with explanation along with areas to be evaluated by initialing the designated areas on the parental consent to evaluate form.
  - Parental Consent to evaluate is obtained if vision and hearing clearance is current. ****Do not get permission to evaluate until hearing and vision have been cleared.**
  - Team is encouraged to have parent fill out any rating forms needed after Consent to Evaluate is signed and while the parent is at the meeting.
- The Tier III chair will ensure all documents/data listed above the highlighted line on the Initial Referral Checklist are complete and in the student's folder.
- The Special Education personnel will ensure all documents/data listed below the highlighted line on the Initial Referral Checklist are complete and in the student's folder.
- The Special Education teacher will send the completed evaluation folder to the appropriate clerk at EEC within 7 days of consent being signed.
- Tier III chair will initiate Eligibility Report in Infinite Campus for all cases.

- The exceptional education records clerk will verify that all necessary information is in the folder, will set up the folder and will document the referral on the Ex Ed Initial Referral Log. The record's clerk will send an email notification of the 60 day timeline date to the student's school RTI chair, Speech Language Pathologist, the assigned School Psychologist, the Special Education teacher, the Exceptional Education Coordinator, the Exceptional Education Director and school Principal. **All initial referral evaluations will be completed within 60 days of receiving consent to evaluate.**
- The exceptional education records clerk will give the folder to the psychologist assigned to the student's school for the purpose of an evaluation or for a comprehensive records review (articulation only concerns).
- The school psychologist will review the folder and begin the assessment process.
- The psychologist will enter information in areas assessed on the Eligibility Report in Infinite Campus and then give the student's folder back to the appropriate exceptional education records clerk.
- After the evaluation folder is documented and necessary copies are made, the exceptional education records clerk will send the evaluation folder to the special education personnel.
- The comprehensive eligibility evaluation will be documented on the Eligibility Report in Infinite Campus as a collaborative effort. As guidance:
  - Section 1-5 - RtI chair
  - Section 6 - RtI chair (medical, social/developmental history form, parent), Psychologist, Speech Language Pathologist, Special Education Teacher, other service providers as necessary
  - Section 7-10 - Eligibility team members

- The Eligibility meeting will be conducted and facilitated by persons coordinating the evaluation. Required participants should be reflective of the multidisciplinary evaluation team, inclusive of the parent,special education teacher, LEA, regular education teacher and either Special Education Coordinator or Psychologist. Other members may include the SLP, OT, and PT. The parent should be provided a 7 day written Eligibility meeting notice according to Troup County procedures. Procedures for notice should be consistent with the procedures followed for IEP meetings. **Parents must be given 3 written opportunities to participate.**
- If the invitation is returned with an indication that the parent/guardian will not attend, the meeting may be held. Please keep in mind that two (2) additional attempts must be made to have the parent/guardian involved in the IEP process. These attempts must be documented.
- **If the parent/guardian <u>does not</u> attend the placement meeting, a copy of the eligibility, psychological report, minutes of the meeting, IEP, Parental Consent for Placement and Parental Rights must be sent to the parent/guardian. The initiation of services should be at least seven (7) days after the meeting to allow ample time to notify the parent of the committee recommendations and to obtain signatures. In case of less than 7 days to implementation, a signature must be secured.**
- **A meeting cannot be held with only a special education teacher and parent. At least one general education teacher who serves the student must attend as well as an LEA.** The special education teacher cannot serve as both case manager and LEA at the same meeting. There must always be a person present who can commit special education resources – an LEA.
- At the eligibility meeting the results of the assessments will be discussed by each respective member of the team and the Eligibility Report is presented and completed. A Psychological Report is also presented at this meeting
  - In order to expedite the eligibility determination process, sections 1 –6 should be completed prior to the eligibility meeting.
  - Sections 7 – 10 should be completed as a team during the eligibility meeting. This includes discussion of exclusionary factors, determination of a disability, and if appropriate the need for special education.
  - All members attending the meeting should be listed and should sign the last page of the eligibility report.
- Parent will receive a copy of the evaluation report and the eligibility report.

- If the student is found eligible
    - A Consent to Place should be obtained via parent signature. This form is found under *Create New Document* in Infinite Campus.
    - If parent does not sign Consent to Place, team adjourns and evaluation folder is sent to records clerk at the Exceptional Education Center.
    - **A Parental Consent for placement must be obtained prior to the student being placed in special education or if the placement changes.**
    - All required members must be in attendance or the meeting should be rescheduled.
    - The team is responsible for updating the Flag status of the student to SPED.
    - After the eligibility meeting and IEP meeting, the folder is sent back to the exceptional education records clerk and it will be logged on the Ex Ed Initial Referral Log and submitted for Due Process/Peer Review.
    - After Due Process/Peer Review, the folder will be sent back to the special education teacher or SLP.
    - The student's IEP meeting must be held within 30 calendar days from the eligibility Consent to Place signature date. It is acceptable to hold the eligibility determination meeting and the IEP meeting on the same day when the student is eligible for special education services and the parent agrees and signs the Consent to Place.
- If the student is found ineligible:
    - The rationale should be documented under section 8 or section 10.
    - The folder is sent back to the exceptional education records clerk and it will be logged on Ex Ed Initial Referral Log and submitted for Due Process/Peer Review
    - Eligibility and Evaluation will be uploaded under the RtI tab by the records clerk and email sent to the appropriate RtI facilitator and SST chair.

Troup County School System Reevaluation Procedures

Students already placed in Exceptional Education services (including SI primary students) should be reevaluated if additional concerns arise that cannot be addressed through the services the student is currently receiving. The student's IEP team is responsible for handling the referral with the primary special educator serving as the student's case manager. (The student would **not** go back to through the general education Tier process with the Tier Coordinator.)

The student's IEP committee develops a plan for intervention by convening a reevaluation/redetermination conference.

- Re-evaluation Consideration must be held **every year** at each student's annual review IEP meeting and documented via the Re-evaluation Determination form in Infinite Campus.
- If at the meeting and after review of existing data, the IEP team determines that re-evaluation is needed, hearing and vision should be cleared, and parent consent to evaluate would be signed and dated.
    - Student was initially comprehensively evaluated, but only found eligible for Speech Impaired and there are no other academic, social/emotional/behavioral concerns, the School Psychologist is not required to evaluate the student. Team must document evidence of progress in other areas.
    - If the student has a primary eligibility of Speech Impaired and there are other areas of concern, the student is evaluated in all areas, including evaluation by the School Psychologist. Be sure to document that all areas of difficulty are being addressed through interventions.
- The Special Education personnel will ensure that all items on the Reevaluation Checklist are complete. Hearing and vision must be cleared prior to evaluation.
- The folder should be sent to the appropriate (elementary or secondary) records clerk at EEC within 7 school days of receipt of the consent form

- EEC records clerk will verify that all necessary information is in the folder, will set up the folder and will document the referral on the reevaluation referral log. The records clerk will assign to a school psychologist.
- The school psychologist will review the folder and begin the assessment process. The reevaluation is comprehensive so all areas of education must be assessed by the respective member of the team.
- The results of the comprehensive re-evaluation will be documented on the Eligibility Determination form.
- After the psychologist has entered the results of the psychological evaluation on the Eligibility Determination form, he/she will give the student's folder back to the EEC records clerk.
- After the folder is documented and necessary copies are made, the exceptional education records clerk will send the folder to the special education teacher or the SLP.
- After the eligibility meeting is conducted and the eligibility determination report is completed, the folder is sent back to the appropriate EEC records clerk for due process review. **Please remember to include your school folder as well.**If found eligible have the parent sign a new consent to place.
- A new IEP, with updated information must be completed no later than 30 days following the eligibility determination. It is encouraged that this IEP be completed at the same time that the eligibility is complete.
- Parent will receive a copy of the evaluation report and the eligibility report.
- After the due process review, the evaluation folder will be sent back to the special education
- teacher or SLP. This will then be the school folder.
- If the student is found no longer eligible for special education services, the contact person is responsible for changing the student's status from "active" to "not eligible" in the special education computer-based IEP program, Infinite Campus.

Parental Refusal to Provide Consent:

If the parent refuses consent for evaluation, he/she must document their reasons for refusal on the Parental Consent for Exceptional education Evaluation. In addition, these reasons should be documented in the RTI meeting minutes. The school should also document all efforts to obtain consent.

Eligibility and Initial Placement

Evaluation Report and Eligibility Report will be provided to the parent at No Cost.

The **Eligibility Report** is the documentation that verifies if the student is or is not eligible for exceptional education services. It is a team effort to hold an eligibility meeting, a variety of people (exceptional education teacher, general education teacher(s), parents, school administrators) take part in evaluating/interviewing/observing the student and documenting the results on the *Infinite Campus* Eligibility Report. An Eligibility Team Meeting to determine eligibility is required for all disability areas.

The **Eligibility Report** is comprised of the following data:

- Student Identifying Information
- Case History (provides an overview picture of the child)
- Hearing and vision screening dates (conducted prior to administration of assessments). These screenings are completed within a year of the evaluation.
- Summary of interventions that were made PRIOR to referral (gives the committee a quick look at the interventions and adaptation of content, methodology, and/or instructional delivery that have already occurred).
- Initial eligibility – The committee lists the interventions provided for the child.

- Reevaluation - The committee lists the specially designed instruction which includes: Adaptation of Content, Methodology (specialized program), or Instructional Delivery. Additional areas of concern that have developed since the previous eligibility are also listed.
- Summary of Progress Monitoring data toward achieving standards (data about specific scientific research or evidence-based intervention(s) and accurate information on the progress monitoring data results for the intervention(s) implemented for an initial evaluation or the specially designed instruction for reevaluation are provided)
- Area(s) of difficulty
- Scientific, research, evidence based interventions which includes baseline performance and intervention data
- Results of District, State, and Benchmark assessments
- Individual student data
- Exclusionary Factors
- Decision-Making for Eligibility
- Summary of Considerations
- Determination of Eligibility
- Eligibility Team Information - This section includes the title, position, and name of the members present.

NOTE: There are occasional situations that are so compellingly appropriate for Exceptional education consideration that it would be unacceptable to delay needed services by having to go through Response to Intervention (RTI-MTSS)/Student Support Team (SST) processes. The committee must review the information presented by the parents and school to determine if the intensity of the rare, unique situation warrants referral for immediate comprehensive exceptional education evaluation and eligibility consideration. If it does, this section of the report is explained.

Independent Educational Evaluation

If a parent disagrees with the evaluation that the school system completed, TCSS will provide IEE information to the parent. The information will include the amount the school system will pay for an evaluation and there will be no cost to the parent.

1. If a parent requests an independent educational evaluation at public expense, TCSS must, without unnecessary delay either, initiate an impartial due process hearing to show that the system evaluation is appropriate, or provide independent educational evaluation is provided at public expense, unless TCSS demonstrates in a hearing that the evaluation obtained by the parent did not meet agency criteria.
2. If the final decision is that the TCSS evaluation is appropriate, the parent(s) still has/have the right to an independent educational evaluation but not at public expense.
3. If a parent requests an independent educational evaluation, TCSS may ask for the parent's reason why he or she objects to the public evaluation. However, the explanation by the parent may not be required and TCSS may not unreasonably delay either providing the independent educational evaluation at public expense or initiating an impartial due process hearing to defend the TCSS evaluation.
4. TCSS must provide to the parents, upon request, information about where an independent educational evaluation may be obtained and the criteria applicable for independent educational evaluations.

If the parent obtains an independent educational evaluation at public or private expense, the results of the evaluation:

a. Shall be considered by TCSS, if it meets state and TCSS criteria, in any decision made with respect to the provision of a FAPE to the child; and
b. May be presented by either party as evidence at an impartial due process hearing under these Rules regarding that child.
c. If the administrative law judge or hearing officer conducting the impartial due process hearing requests an independent educational evaluation as part of a hearing, the cost of the evaluation shall be at public expense.
d. Whenever the state or TCSS pays for an independent educational evaluation, the criteria under which the evaluation is obtained, including the location of the evaluation and the qualifications of the examiner, shall be the same as the criteria which the state or TCSS uses when it initiates an evaluation.
e. Except for the criteria described in this Rule, a LEA (TCSS) may not impose conditions or timelines related to obtaining an independent educational evaluation at public expense. [34 C.F.R. § 300.502(e)(1) – (2)].
f. A parent is entitled to only one independent education evaluation at public expense each time TCSS conducts an evaluation with which the parent disagrees.

Exclusionary Factors

Possible exclusion factors are discussed at length during the Student Support Team (Tier 3) process as to whether the factor had an impact on the child's educational progress.

Exclusionary factors are considered in eligibility determinations. Each factor is considered for its impact or lack of impact on educational progress. The explanation describes why or why not a factor has influenced educational progress. Once the factors have been addressed, the team refers to the responses and to the eligibility criteria for each disability category.

TCSS utilizes the following guidance from the Georgia Department of Education when addressing each **exclusionary factor**:

a. Lack of appropriate instruction in reading, to include the essential components of reading instruction (phonemic awareness, phonics, fluency, vocabulary, and comprehension);
b. Lack of appropriate instruction in math;
c. Lack of appropriate instruction in writing;
d. Limited English proficiency;
e. Visual, hearing or motor disability;
f. Intellectual disabilities;
g. Emotional disturbances;
h. Cultural factors;
i. Environmental or economic disadvantage; or
j. Atypical educational history (such as irregular school attendance or attendance at multiple schools)

The committee analyzes information in order to rule out as source of difficulty when determining specific disabilities.

Professional Learning: Annually training will be provided to stakeholders in order to maintain

continuity of practices and procedure and to ensure compliance and accountability.

Monitoring the Implementation: Annually each school will participate in an IDEA Procedure Review.

Technical Assistance: If areas of concern are noted during the IDEA Procedure Review a plan for technical assistance will be developed. The plan can include TKES and LKES documentation, as well as professional learning.

ELIGIBILTY DETERMINATION AND CATEGORIES OF ELIGIBILITY (STATE BOARD RULE: 160-4-7-.05)

A child or youth from 3 through 21 years of age is considered to have a disability under *the Individuals with Disabilities Education Improvement Act* (IDEA 2004) if the child or youth meets the eligibility criteria in any of the following areas and needs exceptional education and related services:

a. Autism spectrum disorder.
b. Deafblind.
c. Deaf/hard of hearing.
d. Emotional and behavioral disorder.
e. Intellectual disability (mild, moderate, severe, profound).
f. Orthopedic impairment.
g. Other health impairment.
h. Significant developmental delay.
i. Specific Learning disability.
j. Speech-language impairment.
k. Traumatic brain injury.
l. Visual impairment.

DETERMINATION OF ELIGIBILITY

Upon completion of the administration of assessments and other measures, a group of qualified professionals and the parents of the child (Eligibility Team) determine whether the child is a child with a disability and the educational needs of the child.

The *screening* of children by a teacher or specialist to determine appropriate instructional strategies for curriculum implementation shall not be considered to be an evaluation for eligibility for exceptional education and related services. Student referrals must be preceded by evidenced-based academic and/or behavioral interventions.

Exclusionary Factors

All eligibility categories include the following exclusionary factors:

- Lack of appropriate instruction in reading, including the essential components of reading instruction as defined in section 1208 (3) of ESSA or
- Lack of appropriate instruction in mathematics or
- Limited English Proficiency

*Additional exclusionary factors exist for Specific Learning Disability (SLD)

Eligibility Data Sources

An eligibility determination must be made using the convergence of data from multiple sources to document each of the following:

- achievement tests
- aptitude/cognitive functioning
- parent input
- teacher recommendations
- physical condition (medical, motor, vision, hearing)
- social /cultural background
- adaptive behavior
- communication/language
- observations by teachers and related service providers

The school system will provide a copy of the evaluation report and the documentation of determination of eligibility at no cost to the parent.

Georgia Department of Education: Eligibility

AUTISM

Autism is a developmental disability, generally evident before age three, which adversely affects a student's educational performance and significantly affects developmental rates and sequences, verbal and non-verbal communication and social interaction and participation. Other characteristics often associated with autism are unusual responses to sensory experiences, engagement in repetitive activities and stereotypical movements and resistance to environmental change or change in daily routines. Students with autism vary widely in their abilities and behavior. The term does not apply if a student's educational performance is adversely affected primarily because the student has an emotional and behavioral disorder.
The term of *Autism* may also include students who have been diagnosed with Pervasive Developmental Disorder, Asperger's Disorder, Rhett's Disorder, or Childhood Disintegrative Disorder provided the student's educational performance is adversely affected and the student meets the eligibility and placement requirements. *Autism* may exist concurrently with other areas of disability.

<u>Evaluations and Assessments</u>
The following evaluations and assessments shall be utilized to determine the presence of the characteristics of Autism Spectrum Disorder:

1. **Comprehensive psychological evaluation** to include a formal assessment of intellectual functioning and an assessment of adaptive behavior.
2. **Educational evaluation** to include an assessment of educational performance and current functioning levels.
3. **Communication evaluation** to include assessment of verbal and non-verbal communication, prosody (linguistics including intonation, rhythm and focus in speech), and pragmatic language utilizing both formal and informal measures.
4. **Behavioral evaluations** to include assessment of social interaction and participation, peer and adult interactions, capacity to relate to others, stereotypical behaviors, resistance to change, atypical responses to sensory stimuli, persistent preoccupation with or attachment to objects and other behaviors often associated with autism spectrum disorder.

5. **Developmental history** to include developmental differences and delays and age of onset, which is typically before the age of three. A child may be diagnosed as a child with autism spectrum disorder after age three if the characteristics of autism spectrum disorder are met.

Eligibility and Placement

Eligibility shall be based on assessment of the five characteristic areas associated with autism spectrum disorder. The assessments shall minimally document that each of the characteristic areas of (1) developmental rates and sequences, (2) social interaction and
participation and (3) verbal and non-verbal communication are affected. The adverse effect on a child's educational performance shall be documented and based on the following criteria:

1. **Developmental rates and sequences.** A child exhibits delays, arrests, and/or
2. Inconsistencies in the acquisition of motor, sensory, social, cognitive, or communication skills. Areas of precocious or advanced skill development may also be present, while other skills may develop at typical or extremely depressed rates. The order of skill acquisition frequently differs from typical developmental patterns.
3. **Social interaction and participation.** A child displays difficulties and/or idiosyncratic differences in interacting with people and participating in events. Often a child is unable to establish and maintain reciprocal relationships with people. A child may seek consistency in environmental events to the point of exhibiting rigidity in routines.
4. **Communication (verbal and/or nonverbal).** A child displays a basic deficit in the capacity to use verbal language for social communication, both receptively and expressively. Characteristics may involve both deviance and delay. Verbal language may be absent or if present, may lack usual communicative form, or the child may have a nonverbal communication impairment. Some children with autism may have good verbal language but have significant problems in the effective social or pragmatic use of communication.
5. **Sensory processing.** A child may exhibit unusual, repetitive or unconventional responses to sensory stimuli of any kind. A child's responses may vary from low to high levels of sensitivity.
6. **Repertoire of activities and interests.** A child may engage in repetitive activities and/or may display marked distress over changes, insistence on following routines and a persistent preoccupation with or attachment to objects. The capacity to use objects in an appropriate or functional manner may be absent, arrested, or delayed. A child may have difficulties displaying a range of interests and/or imaginative play. A child may exhibit stereotypical body movements.

A child with **Autism Spectrum Disorder** may be served by any appropriately certified teacher in any educational program as described in the child's *Individualized Education Program* (IEP). The identification of Autism Spectrum Disorder for educational programming does not dictate a specific placement; however, it is based on the assessed strengths, weaknesses and individual goals and objectives of the child.

Deafblind

Deafblind means concomitant hearing and visual impairments, the combination of which causes such severe communication and other developmental and educational needs that they cannot be accommodated in exceptional education programs solely for children with deafness or children

with blindness.

Eligibility and Placement

1. For a child to be determined eligible for placement in special programs for the Deafblind, the child shall have current optometric or ophthalmological examination and an audiological evaluation, all administered by qualified professionals. Children who are deafblind shall have an audiological evaluation administered by a certified/licensed audiologist annually, or more often if needed. The annual audiological evaluation shall include, but is not limited to: an otoscopic inspection, unaided and aided pure tone and speech audiometry (as applicable), immittance testing, word recognition, hearing aid check and electro-acoustic analysis of the hearing aid (if amplified), and an analysis of a frequency modulated (FM) system check (if utilized). A comprehensive written report is required indicating the dates of the audiological evaluation and a description of the results of the audiological testing and amplification evaluation. In addition, the report should include a description of classroom environmental modifications which will assist the individualized education program (IEP) team in making instructional decisions, the child's ability to understand spoken language with and without amplification, and an interpretation of the results as they apply to the child in his or her classroom setting.
2. Children who are deafblind may receive educational services in classes with other disabled children; however, the class-size ratio for Deafblind shall be maintained.

Deaf and Hard of Hearing

A child who is **deaf or hard of hearing** is one who exhibits a hearing loss that, whether permanent or fluctuating, interferes with the acquisition or maintenance of auditory skills necessary for the normal development of speech, language, and academic achievement and, therefore, adversely affects a child's educational performance.

1. A child who is deaf can be characterized by the absence of enough measurable hearing (usually a pure tone average of 66-90+ decibels American National Standards Institute without amplification) such that the primary sensory input for communication may be other than the auditory channel.
2. A child who is hard of hearing can be characterized by the absence of enough measurable hearing (usually a pure tone average range of 30-65 decibels American National Standards Institute without amplification) that the ability to communicate is adversely affected; however, the child who is hard of hearing typically relies upon the auditory channel as the primary sensory input for communication.

Eligibility and Placement

The eligibility report shall include audiological, otological and educational evaluation reports.

a) **Audiological evaluations** shall be provided with initial referral. Children who are deaf or hard of hearing shall have an audiological evaluation administered by a certified/licensed audiologist annually, or more often if needed. The annual audiological evaluation shall include, but is not limited to: an otoscopic inspection, unaided and aided pure tone and speech audiometry (as applicable), immittance testing, word recognition, hearing aid check and electro-acoustic analysis of the hearing aid (if amplified), an analysis of a frequency modulated (FM) system check (if utilized). A comprehensive written report shall be included in the audiological evaluation. This written report shall include, but is not limited to: the date of the audiological evaluation, description of the

results of the
audiological testing, an amplification evaluation including the child's ability to understand spoken language with and without amplification, as well an interpretation of the results as they apply to the child in his or her classroom setting.

b) An **otological evaluation** report from appropriately licensed or certified personnel is required at the time of initial placement in the program for the deaf/hard of hearing. The otological evaluation report is required as medical history pertinent to the absence of hearing. If such a report is not available upon initial placement, it shall be obtained within 90 days of placement. The initial or most recent otological evaluation result shall be summarized and that otological evaluation report shall be attached to the eligibility report.

c) A **comprehensive educational assessment** shall be used in the development of the child's individualized education program (IEP). The educational evaluation shall include assessment data from more than one measure and shall include, but is not limited to, information related to academic/achievement levels, receptive and expressive language abilities, receptive and expressive communication abilities, social and emotional adjustment and observational data relative to the child's overall classroom performance and functioning.

1. A **psychological evaluation**, using instruments appropriate for children who are deaf or hard of hearing, is recommended as part of the overall data when eligibility is being considered.
2. Children who exhibit a **unilateral hearing loss** may be considered for eligibility provided documentation exists that indicates academic or communicative deficits are the result of the hearing loss.

<u>Additional Requirements</u>

1. An **evaluation of the communication** needs of a child who is deaf or hard of hearing shall be considered in the program and class placement decisions. An evaluation of a child's communication needs shall include, but is not limited to: language and communication needs and abilities, opportunities for direct communication with peers
and professional personnel in the child's preferred language and communication mode, severity of loss, educational abilities, academic level and full range of needs, including opportunities for direct instruction in the child's language and communication mode.
2. Any classroom to be used for a child who is deaf or hard of hearing shall be **sound treated** and present an appropriate acoustical environment for the child. All placements, including regular education placements and desk arrangements within classrooms shall be made so that environmental noise and interruptions are minimized.
3. Recommendation of the appropriate educational environment, including acoustical considerations, should be made by the IEP Team.
4. Each local education agency shall have **written procedures** to ensure the proper functioning of assistive amplification devices used by children who are deaf or hard of hearing. These procedures shall include the designated qualified responsible personnel, daily and ongoing schedules for checking equipment, as well as follow-up procedures.

Emotional and Behavioral Disorder

An emotional and behavioral disorder is an emotional disability characterized by the following:

1. An inability to build or maintain satisfactory interpersonal relationships with peers and/or teachers. For preschool-age children, this would include other care providers.
2. An inability to learn which cannot be adequately explained by intellectual, sensory or health factors.
3. Consistent or chronic inappropriate type of behavior or feelings under normal conditions.
4. Displayed pervasive mood of unhappiness or depression.
5. Displayed tendency to develop physical symptoms, pains or unreasonable fears associated with personal or school problems.

A student with an **Emotional and Behavioral Disorder** (EBD) is a student who exhibits one or more of the above emotionally based characteristics of sufficient duration, frequency and intensity that it/they interfere(s) significantly with educational performance to the degree that provision of exceptional educational services is necessary. For preschool-age children, these characteristics may appear within the preschool environment or in another setting documented through an extended assessment period. The student's difficulty is emotionally based and cannot be adequately explained by intellectual, cultural, sensory or general health factors.

Eligibility and Placement

1. A child may be considered for placement in a program for children with EBD based upon an eligibility report that shall include the following:
   - Documentation of **comprehensive prior extension of services** available in the regular program to include counseling, modifications of the regular program or alternative placement available to all children, and data based progress monitoring of the results of interventions
   - **Psychological and educational evaluations**
   - Report of **behavioral observations** over a significant period of time;
   - Appropriate **social history** to include information regarding the history of the child's current problem(s), the professional services and interventions that have been considered or provided from outside the school; and
   - Adequate documentation and written analysis of the **duration, frequency** and **intensity** of one or more of the characteristics of emotional and behavioral disorders.
2. A child must not be determined to be a child with an Emotional and Behavioral Disorder if the primary factor for that determination is:
   a. Lack of appropriate instruction in reading, including the essential components of
   b. reading instruction;
   c. Lack of appropriate instruction in math;
   d. Lack of appropriate instruction in writing;
   e. Limited English proficiency;
   f. Visual, hearing or motor disability;
   g. Intellectual disabilities;
   h. Cultural factors;
   i. Environmental or economic disadvantage; or
   j. Atypical education history (multiple school attendance, lack of attendance, etc.).

The term does *not* include children with social maladjustment unless it is determined that they are also children with EBD. A child whose values and/or behavior are in conflict with the school, home or community or who has been adjudicated through the courts or other involvement with correctional agencies is neither automatically eligible for nor excluded from EBD placement. Classroom behavior problems and social problems, *e.g.,* delinquency and drug abuse, or a diagnosis of conduct disorder, do not automatically fulfill the requirements for

eligibility for placement.

Intellectual Disabilities

Intellectual disabilities refers to significantly sub-average general intellectual functioning which exists concurrently with deficits in adaptive behavior that adversely affect educational performance and is manifested during the developmental period. Intellectual disability does not include conditions primarily due to a sensory or physical impairment, traumatic brain injury, autism spectrum disorders, severe multiple impairments, cultural influences or a history of inconsistent and/or inadequate educational programming.

(a) **Significantly sub-average general intellectual functioning** is defined as approximately 70 IQ or below as measured by a qualified psychological examiner on individually administered, nationally normed standardized measures of intelligence.
   (1) All IQ scores defining eligibility for children with intellectual disabilities shall be interpreted as a range of scores encompassed by not more than one standard error of measurement below and above the obtained score. The standard error of measurement for a test may be found in the technical data section of the test manual.
   (2) Any final determination of the level of intellectual functioning shall be based on multiple sources of information and shall include more than one formal measure of intelligence administered by a qualified psychological examiner. There may be children with IQ scores below 70 who do not need exceptional education. Interpretation of results should take into account factors that may affect test performance such as socioeconomic status, native language, and cultural background and associated disabilities in communication, sensory or motor areas.
      (i) Significantly sub-average intellectual functioning must be verified through a written summary of at least one structured observation that demonstrates the child's inability to progress in a typical, age appropriate manner and with
      consideration for culturally relevant information, medical and education history.

(b) Deficits in **adaptive behavior** are defined as significant limitations in a child's effectiveness in meeting the standards of maturation, learning, personal independence or social responsibility, and especially school performance that is expected of the individual's age-level and cultural group, as determined by clinical judgment.
   (1) The child demonstrates significantly sub-average adaptive behavior in school and home, and, if appropriate, community environments. These limitations in adaptive behavior shall be established through the use of standardized adaptive behavior measures normed on the general population, including people with disabilities and people without disabilities. On these standardized measures, significant limitations in adaptive behavior are operationally defined as performance that is at least two standard deviations below the mean of either (a) one of the following three types of adaptive behavior: conceptual, social, or practical, or (b) an overall (composite) score on a standardized measure of conceptual, social, and practical skills. Documentation must include information from at least two sources. The first source shall be someone from the local school who knows the child and the second source shall be someone who knows the child outside of the school environment such as a parent, guardian, or person acting as a parent.
      (i) Interpretation of results should consider the child's cultural background, socioeconomic status and any associated disabilities that may limit or impact the results of the adaptive behavior measures.

(c) Deficits in intellectual functioning and adaptive behavior must have existed prior to

age 18.

(d) A child must not be determined to be a child with an Intellectual Disability if the determinant factor for that determination is:
   1. Lack of appropriate instruction in reading, including the essential components of reading instruction;
   2. Lack of appropriate instruction in math;
   3. Lack of appropriate instruction in written expression;
   4. Limited English proficiency;
   5. Visual, hearing or motor disability;
   6. Emotional disturbances;
   7. Cultural factors;
   8. Environmental or economic disadvantage; or
   9. Atypical educational history (multiple school attendance, lack of attendance, etc.).

Eligibility and Placement

A child may be classified as having an **intellectual disability** (at one of the levels listed below) when a comprehensive evaluation indicates deficits in both intellectual functioning and adaptive behavior**.** Intellectual functioning and adaptive behavior shall be considered equally in any determination that a child is eligible for services in the area of intellectual disability. A comprehensive educational evaluation shall be administered to determine present levels of academic functioning. The report shall be prepared for each child to provide an adequate description of the data collected and explicit pre-referral interventions prior to evaluation and to explain why the child is eligible for services in a program for children with intellectual disabilities. In situations where discrepancies exist between test score results from intellectual functioning, adaptive behavior and academic achievement, the eligibility report must contain a statement of specific factors considered which resulted in the decision of the eligibility team. Eligibility teams must establish that any limits in performance are not primarily due to the exclusionary factors and must document this in the eligibility report:

A child may be classified as having an intellectual disability at one of the levels listed below:

Mild Intellectual Disability (MID)

(1) Intellectual functioning ranging between an upper limit of approximately 70 to a lower limit of approximately 55; and
(2) Deficits in adaptive behavior that significantly limit a child's effectiveness in meeting the standards of maturation, learning, personal independence or social responsibility, and especially school performance that is expected of the individual's age level and cultural group, as determined by clinical judgment.

Moderate Intellectual Disability (MOID)

(1) Intellectual functioning ranging from an upper limit of approximately 55 to a lower limit of approximately 40; and
(2) Deficits in adaptive behavior that significantly limit a child's effectiveness in meeting the standards of maturation, learning, personal independence or social responsibility, and especially school performance that is expected of the individual's age level and cultural group as determined by clinical judgment.

Severe Intellectual Disability (SID)

(1) Intellectual functioning ranging from an upper limit of approximately 40 to a lower

limit of approximately 25; and

(2) Deficits in adaptive behavior that significantly limit a child's effectiveness in meeting the standards of maturation, learning, personal independence or social responsibility and especially school performance that is expected of the individual's age level and cultural group as determined by clinical judgment.

Profound Intellectual Disability (PID)

(1) Intellectual functioning below approximately 25; and
(2) Deficits in adaptive behavior that significantly limit a child's effectiveness in meeting the standards of maturation, learning, personal independence or social responsibility and especially school performance that is expected of the child's age-level and cultural group, as determined by clinical judgment.

Orthopedic Impairment

Orthopedic impairment refers to a child whose severe orthopedic impairments adversely affects their educational performance to the degree that the child requires exceptional education. This term may include:

(1) Impairment caused by congenital anomalies, e.g., deformity or absence of some limb.
(2) Impairment caused by disease (poliomyelitis, osteogenesis imperfecta, muscular dystrophy, bone tuberculosis, etc.)
(3) Impairment from other causes, e.g., cerebral palsy, amputations, and fractures or burns that cause contractures.

Secondary disabilities may be present, including, but not limited to, visual impairment, hearing impairment, communication impairment and/or intellectual disability.

<u>Eligibility and Placement</u>

Evaluation for initial eligibility shall include the following.

(1) A **current medical evaluation** from a licensed doctor of medicine. The evaluation report used for initial eligibility shall be current within one year. The evaluation shall indicate the diagnosis/prognosis of the child's orthopedic impairment, along with information as applicable regarding medications, surgeries, special health care procedures and special diet or activity restrictions.
(2) A **comprehensive educational assessment** to indicate the adverse effects of the orthopedic impairment on the child's educational performance.
(3) Assessments shall document deficits in: pre-academic or academic functioning, social/emotional development, adaptive behavior, and motor development or communication abilities resulting from the orthopedic impairment. When assessment information indicates significant deficit(s) in cognitive/academic functioning, a psychological evaluation shall be given.
(4) Children served in a program for orthopedic impairments should be functioning no lower than criteria outlined for mild intellectual disabilities programs. For those children with orthopedic impairments served in other exceptional education programs due to the severity of their sensory or intellectual disability, support by the OI teacher regarding the implications of the child's orthopedic impairment may be appropriate.

Other Health Impaired

Other Health Impairment means having limited strength, vitality or alertness including a heightened alertness to environmental stimuli, that results in limited alertness with respect to the educational environment, that:

1. is due to chronic or acute health problems such as asthma, attention deficit disorder or attention deficit hyperactivity disorder, diabetes, epilepsy, or heart condition, hemophilia, lead poisoning, leukemia, nephritis, rheumatic fever, and sickle cell anemia; and Tourette Syndrome, and
2. adversely affects a student's educational performance
3. is due to chronic or acute health problems such as asthma, attention deficit disorder or attention deficit hyperactivity disorder, diabetes, epilepsy, or heart condition, hemophilia, Lead poisoning, leukemia, nephritis, rheumatic fever, and sickle cell anemia; and Tourette Syndrome, and
4. adversely affects a student's educational performance.

Significantly Developmental Delay

The term significant developmental delay refers to a delay in a child's development in adaptive behavior, cognition, communication, motor development or emotional development to the extent that, if not provided with special intervention, the delay may adversely affect a child's educational performance in age-appropriate activities. The term does not apply to children who are experiencing a slight or temporary lag in one or more areas of development, or a delay which is primarily due to environmental, cultural, or economic disadvantage or lack of experience in age appropriate activities. The SDD eligibility may be used for children from ages **three** through **nine** (the end of the school year in which the child turns nine).

<u>Eligibility</u>

(1) Initial eligibility must be established, and an IEP in place, on or before the child's seventh birthday. Significant Developmental Delay (SDD) eligibility is determined by assessing a child in each of the five skill areas of adaptive development, cognition, communication, physical development (gross and fine motor), and social/emotional development. Any child who scores at least 2 standard deviations below the mean in one or more of the five areas or 1½ standard deviations below the mean in two or more areas shall meet eligibility for SDD.

(2) For children who are kindergarten age or older, initial eligibility shall also include documented evidence that the impact on educational performance is not due to:

   (a) Lack of appropriate instruction in reading or literacy readiness, including the essential components of reading instruction;

(b) Lack of appropriate instruction in math or math readiness skills;
(c) Limited English proficiency;
(d) Visual, hearing or motor disability;
(e) Emotional disturbances;
(f) Cultural factors; or
(g) Environmental or economic disadvantage.

(3) All five skill areas shall be assessed using at least one formal assessment. In those areas in which a significant delay is suspected, at least one additional formal assessment must be utilized to determine the extent of the delay. All formal assessments must be age appropriate, and all scores must be given in standard deviations.

(4) For children eligible under SDD with hearing; visual; communication; or orthopedic impairments, a complete evaluation must be obtained to determine if the child also meets eligibility criteria for deaf/hard of hearing, visual impairments, speech and language impairments or orthopedic impairments. Students with sensory, physical or communication disabilities must receive services appropriate for their needs, whether or not specific eligibility is determined.

Placement and Service Delivery

(1) Preschool-aged (3-5) children meeting eligibility criteria as SDD and needing exceptional education services may receive those services in a variety of placement options, as determined by the child's IEP Team and participation by other agencies, such as, but not limited to:
   (a) Regular Early Childhood Setting, Head Start Programs, Georgia Pre-K Classes, Community Daycares, Private Preschools
   (b) Separate Early Childhood Exceptional education Setting;
   (c) Day School;
   (d) Residential Facility;
   (e) Service Provider Location; or
   (f) Home

(2) School-aged children with SDD shall be served by any appropriately certified teacher in any education program designed to meet the needs of the child, as specified by the child's IEP team.

Specific Learning Disability

(1) Specific Learning Disability is defined as a disorder in one or more of the basic psychological processes involved in understanding or in using language, spoken or written, that may manifest itself in an imperfect ability to listen, think, speak, read, write, spell or do mathematical calculations. The term includes such conditions as perceptual disabilities, brain injury, minimal brain dysfunction, dyslexia and developmental aphasia. The term does not apply to children who have learning problems that are primarily the result of visual, hearing or motor disabilities, intellectual disabilities, emotional or behavioral disorders, environmental, cultural or economic disadvantage.

(2) The child with a specific learning disability has one or more serious academic deficiencies and does not achieve adequately according to age to meet State-approved grade-level standards. These achievement deficiencies must be directly related to a

pervasive processing deficit and to the child's response to scientific, research-based interventions. The nature of the deficit(s) is such that classroom performance is not correctable without specialized techniques that are fundamentally different from those provided by general education teachers, basic remedial/tutorial approaches, or other compensatory programs. This is clearly documented by the child's response to instruction as demonstrated by a review of the progress monitoring available in general education and Student Support Team (SST) intervention plans as supported by work samples and classroom observations. The child's need for academic support alone is not sufficient for eligibility and does not override the other established requirements for determining eligibility.

Exclusionary Factors

A child must not be determined to be a child with a specific learning disability if the determinant factor for that determination is:

a. Lack of appropriate instruction in reading, to include the essential components of reading instruction (phonemic awareness, phonics, fluency, vocabulary, and comprehension);
b. Lack of appropriate instruction in math;
c. Lack of appropriate instruction in writing;
d. Limited English proficiency;
e. Visual, hearing or motor disability;
f. Intellectual disabilities;
g. Emotional disturbances;
h. Cultural factors;
i. Environmental or economic disadvantage; or
j. Atypical educational history (such as irregular school attendance or attendance at multiple schools)

Required Data Collection

(1) In order to determine the existence of Specific Learning Disability, the group must summarize the multiple sources of evidence to conclude that the child exhibits a pattern of strengths and weaknesses in performance, achievement, or both, relative to age, State approved grade level standards and intellectual development. Ultimately, specific learning disability is determined through professional judgment using multiple supporting evidences that must include:
    (a) Data are collected that include:
        (i) At least two current (within twelve months) assessments such as the results of the Georgia Milestones or other state-required assessment, norm-referenced achievement tests or benchmarks indicating performance that does not meet expectations for State-approved grade-level standards
        (ii) Information from the teacher related to routine classroom instruction and monitoring of the child's performance. The report must document the child's academic performance and behavior in the areas of difficulty.
        (iii) Results from supplementary instruction that has been or is being provided:
            (a) that uses scientific, rESSArch or evidence based interventions selected to correct or reduce the problem(s) the student is having and was in the identified areas of concern;

(b) such instruction has been implemented as designed for the period of time indicated by the instructional strategy(ies). If the instructional strategies do not indicate a period of time the strategies should be implemented, the instructional strategies shall be implemented for a minimum of 12 data points to show the instructional strategies' effect or lack of effect that demonstrates the child is not making sufficient progress to meet age or State-approved grade-level standards within a reasonable time frame;

(iv) Interventions used and the data based progress monitoring results are presented to the parents at regular intervals throughout the interventions.

(a) Any educationally relevant medical findings that would impact achievement.

(b) After consent is received from the parents for a comprehensive evaluation for exceptional education determination the following must occur:

1. An observation by a required group member;
2. Documentation that the determination is not primarily due to any of the exclusionary factors;
3. Current analyzed classroom work samples indicating below level performance as compared to the classroom normative sample; and
4. Documentation of a pattern of strength and weaknesses in performance and/or achievement in relation to age and grade level standards must include**:**

(i) A comprehensive assessment of intellectual development designed to assess specific measures of processing skills that may contribute to the area of academic weakness. This assessment must be current within twelve months and

(ii) Current Response to Intervention data based documentation indicating the lack of sufficient progress toward the attainment of age or State-approved grade level standards.

(iii) As appropriate, a language assessment as part of additional processing batteries may be included.

<u>Eligibility Determination</u>

(1) The child who is eligible for services under the category of Specific Learning Disability must exhibit the following characteristics: a primary deficit in basic psychological processes and secondary underachievement in one or more of the eight areas along with documentation of the lack of response to instructional intervention as supported by ongoing progress monitoring.

(2) Deficits in basic psychological processes typically include problems in attending, discrimination/perception, organization, short-term memory, long-term memory, conceptualization/reasoning, executive functioning, processing speed, and phonological deficits. Once a deficit in basic psychological processes is documented, there shall be evidence that the processing deficit has impaired the child's mastery of the academic tasks required in the regular curriculum. Though there may exist a pattern of strengths and weaknesses, evidence must be included documenting that the processing deficits are relevant to the child's academic underachievement as determined by appropriate assessments that are provided to the child in his/her native language. Though a child may

be performing below age or State-approved grade level standards, the results of progress monitoring must indicate that the child **is** not making the expected progress toward established benchmarks. This is indicated by comparing the child's rate of progress toward attainment of grade level standards.

(3) Underachievement exists when the child exhibits a pattern of strengths and weakness in performance, achievement, or both, relative to age, State-approved grade level standards and intellectual development and when a child does not achieve adequately toward attainment of grade level standards in one or more of the following areas:
   (a) **Oral expression**- use of spoken language to communicate ideas;
   (b) **Listening comprehension**-ability to understand spoken language at a level commensurate with the child's age and ability levels;
   (c) **Written expression** - ability to communicate ideas effectively in writing with appropriate language;
   (d) **Basic reading skills**-ability to use sound/symbol associations to learn phonics in order to comprehend the text;
   (e) **Reading comprehension**-ability to understand the meaning of written language based in child's native language;
   (f) **Reading Fluency Skills**- the ability to read and process a text with appropriate rate and accuracy;
   (g) **Mathematics calculation**-ability to process numerical symbols to derive results, including, but not limited to, spatial awareness of symbol placement and choice of sequence algorithms for operations required; and
   (h) **Mathematical problem solving** -ability to understand logical relationships between mathematical concepts and operations, including, but not limited to, correct sequencing and spatial/symbolic representation.

(4) Progress monitoring includes the data-based documentation of repeated assessments of achievement at reasonable intervals, reflecting child progress during instruction. When reviewing progress monitoring data, those students that exhibit a positive response to the research validated instruction being provided cannot be considered as having a specific learning disability even though they may show deficits on achievement tests in the specified areas. In addition, children whose achievement in classroom academics indicates performance that is commensurate with pervasive weaknesses that are not indicative of a pattern of strengths and weaknesses may not be considered as having a specific learning disability.

(5) One group member responsible for determining specific learning disability must conduct an observation of the child's academic performance in the regular classroom after the child has been referred for an evaluation and parental consent for exceptional education evaluation is obtained. The observation of the child is conducted in the learning
environment, including the regular classroom setting, to document the child's academic performance and behavior in the areas of difficulty. The observation must include information from the routine classroom instruction and monitoring of the child's performance.

(6)

be performing below age or State-approved grade level standards, the results of progress monitoring must indicate that the child **is** not making the expected progress toward established benchmarks. This is indicated by comparing the child's rate of progress toward attainment of grade level standards.

(7) Underachievement exists when the child exhibits a pattern of strengths and weakness in performance, achievement, or both, relative to age, State-approved grade level standards and intellectual development and when a child does not achieve adequately toward attainment of grade level standards in one or more of the following areas:
   (a) **Oral expression**- use of spoken language to communicate ideas;
   (b) **Listening comprehension**-ability to understand spoken language at a level commensurate with the child's age and ability levels;
   (c) **Written expression** - ability to communicate ideas effectively in writing with appropriate language;
   (d) **Basic reading skills**-ability to use sound/symbol associations to learn phonics in order to comprehend the text;
   (e) **Reading comprehension**-ability to understand the meaning of written language based in child's native language;
   (f) **Reading Fluency Skills**- the ability to read and process a text with appropriate rate and accuracy;
   (g) **Mathematics calculation**-ability to process numerical symbols to derive results, including, but not limited to, spatial awareness of symbol placement and choice of sequence algorithms for operations required; and
   (h) **Mathematical problem solving** -ability to understand logical relationships between mathematical concepts and operations, including, but not limited to, correct sequencing and spatial/symbolic representation.

(8) Progress monitoring includes the data-based documentation of repeated assessments of achievement at reasonable intervals, reflecting child progress during instruction. When reviewing progress monitoring data, those students that exhibit a positive response to the research validated instruction being provided cannot be considered as having a specific learning disability even though they may show deficits on achievement tests in the specified areas. In addition, children whose achievement in classroom academics indicates performance that is commensurate with pervasive weaknesses that are not indicative of a pattern of strengths and weaknesses may not be considered as having a specific learning disability.

(9) One group member responsible for determining specific learning disability must conduct an observation of the child's academic performance in the regular classroom after the child has been referred for an evaluation and parental consent for exceptional education evaluation is obtained. The observation of the child is conducted in the learning
environment, including the regular classroom setting, to document the child's academic performance and behavior in the areas of difficulty. The observation must include information from the routine classroom instruction and monitoring of the child's performance.

The SLD Eligibility Group

(1) The determination of whether a child suspected of having a Specific Learning Disability is a child with a disability must be made by the child's parents and a team of qualified professionals that must include:
   (a) The child's regular teacher; or if the child does not have a regular teacher, a regular classroom teacher qualified to teach a child of his or her age;
   (b) A highly qualified certified exceptional education teacher; and
   (c) A minimum of one other professional qualified to conduct individual diagnostic assessments in the areas of speech and language, academic achievement, intellectual development, or social-emotional development and interpret assessment and intervention data (such as school psychologist, reading teacher, or educational therapist). Determination of the required group member should be based on the data being reviewed and the child's individual needs.

(2) Each group member must certify in writing whether the report reflects the member's conclusions. If it does not reflect the member's conclusion, the group member must submit a separate statement presenting the member's conclusions.

Speech-Language Impairment

Speech or language impairment refers to a communication disorder, such as stuttering, impaired articulation, language or voice impairment that adversely affects a child's educational performance. A speech or language impairment may be congenital or acquired.

It refers to impairments in the areas of articulation, fluency, voice or language. Individuals may demonstrate one or any combination of speech or language impairments. A speech or language impairment may be a primary disability or it may be secondary to other disabilities.

(1) **Speech Sound Production Impairment (e.g. articulation impairment)** – atypical production of speech sounds characterized by substitutions, omissions, additions or distortions that interferes with intelligibility in conversational speech and obstructs learning, successful verbal communication in the educational setting. The term may include the atypical production of speech sounds resulting from phonology, motor or other issues. The term speech sound impairment does not include:

A) Inconsistent or situational errors;

B) Communication problems primarily from regional, dialectic, and/or cultural differences;

C) Speech sound errors at or above age level according to established research-based developmental norms**,** speech that is intelligible and without documented evidence of adverse effect on educational performance;

D) Physical structures (e.g., missing teeth, unrepaired cleft lip and/or palate) are the primary cause of the speech sound impairment; or

E) Children who exhibit tongue thrust behavior without an associated speech sound impairment.

(2) **Language Impairment** - impaired comprehension and/or use of spoken language which may also impair written and/or other symbol systems and is negatively impacting the

child's ability to participate in the classroom environment. The impairment may involve, in any combination, the form of language (phonology, morphology, and syntax), the content of language (semantics) and/or the use of language in communication

(pragmatics) that is adversely affecting the child's educational performance. The term language impairment does not include:

A) Children who are in the normal stages of second language acquisition/learning and whose communication problems result from English being a secondary language unless it is also determined that they have a speech language impairment in their native/primary language.
B) Children who have regional, dialectic, and/or cultural differences
C) Children who have auditory processing disorders not accompanied by language impairment.
D) Children who have anxiety disorders (e.g. selective mutism) unless it is also determined that they have a speech language impairment. There must be a documented speech-language impairment that adversely affects the educational performance for these children to qualify for exceptional education services.

(3) **Fluency Impairment** - interruption in the flow of speech characterized by an atypical rate, or rhythm, and/or repetitions in sounds, syllables, words and phrases that significantly reduces the speaker's ability to participate within the learning environment. Excessive tension, struggling behaviors and secondary characteristics may accompany fluency impairments. Secondary characteristics are defined as ritualistic behaviors or movements that accompany disfluencies. Ritualistic behaviors may include avoidance of specific sounds in words. Fluency impairment includes disorders such as stuttering and cluttering. It does not include disfluencies evident in only one setting or reported by one observer.

(4) **Voice/Resonance Impairment** – interruption in one or more processes of pitch, quality, intensity, or resonance resonation that significantly reduces the speaker's ability to communicate effectively. Voice/Resonance impairment includes aphonia or the abnormal production of vocal quality, pitch, loudness, resonance, and/or duration, which is inappropriate for an individual's age and/or gender. The term voice/resonance impairment does not refer to:

A) Anxiety disorders (e.g. selective mutism)
B) Differences that are the direct result of regional, dialectic, and/or cultural differences
C) Differences related to medical issues not directly related to the vocal mechanism (e.g. laryngitis, allergies, asthma, laryngopharyngeal reflux (*e.g*. acid reflux of the throat, colds, abnormal tonsils or adenoids, short-term vocal abuse or misuse, neurological pathology)
D) Vocal impairments that are found to be the direct result of or symptom of a medical condition unless the impairment impacts the child's performance in the educational environment and is amenable to improvement with therapeutic intervention.

<u>Evaluation, Eligibility and Placement</u>

All of the exceptional education rules and regulations related to evaluation, eligibility and placement must be followed including:

1. Evaluation:
   A) Documentation of the child's response to prior evidenced-based interventions prior to referral for a comprehensive evaluation.]
   B) A comprehensive evaluation shall be performed by a certified or licensed Speech- Language Pathologist (SLP) for consideration of speech-language eligibility.

Following receipt of a clear hearing and vision screening and medical clearance for voice (as appropriate) this evaluation consists of an initial screening of the child's speech sounds, language, fluency, voice, oral motor competency, academic, behavioral, and functional skills using either formal or informal assessment procedures to assist in determining if the child is a child with a disability an in-depth evaluation of each area suspected of being impaired, using at least one formal test and/or procedure.

C) A full and individual initial evaluation for each area suspected of being a disability must be provided and considered prior to the child's eligibility for speech-language services. This may include assessments in the areas of health (e.g. ENT, otolaryngologist, ophthalmologist, and optometrist), vision, hearing, social and emotional status, general intelligence, academic performance, communicative status and motor abilities.

D) The evaluation is sufficient to identify all of the child's exceptional education and related services needs, whether or not commonly linked to the disability category in which the child has been referred or *classified.*

E) Children with voice/resonance impairment must have a medical evaluation to rule out physical structure etiology by a medical specialist either prior to a comprehensive evaluation or as part of a comprehensive evaluation. The presence of a medical condition (e.g., vocal nodules, polyps) does not necessitate the provision of voice therapy as exceptional education or related service nor does a prescription for voice therapy from a medical doctor. A written order from a medical practitioner is a medical opinion regarding the medical evaluation or treatment that a patient should receive. When directed to a school, these medical orders should be considered by the team as a part of the eligibility process. The team, not a medical practitioner, determines the need for an evaluation for exceptional education services based on documented adverse effect of the voice impairment on the child's educational performance.

F) A variety of assessment tools and strategies must be used to gather relevant functional, developmental and academic information about the child, including information provided by the parent. Information from the evaluation is used to determine whether the child is a child with a disability and the content of the child's IEP including information related to enabling the child to be involved in and progress in the general education curriculum (or for a preschool child, to participate in appropriate activities)

<u>Eligibility</u>:

A) Determining eligibility for speech-language impaired exceptional education services includes three components:
   1) The Speech-Language Pathologist determines the presence or absence of speech-language impairment based on Georgia rules and regulations for exceptional education
   2) Documentation of an adverse effect of the impairment on the child's educational performance
   3) The team determines that the child is a child with a disability and is eligible for exceptional education and appropriate specialized instruction needed to access the student's curriculum.

B) Eligibility shall be determined based on the documented results of at least two or more measures or procedures, at least one of which must be formal, administered in the area of impairment and documentation of adverse effect. A speech-language disorder does not exist if:
    A) Environmental, cultural, or economic disadvantage cannot be ruled out as primary factors causing the impairment; or
    B) A child exhibits inconsistent, situational, transitory or developmentally appropriate speech-language difficulties that children experience at various times and to various degrees.
C) Because children who have communication difficulties do not necessarily have speech or language impairments, the speech-language program may not be the appropriate service delivery model to adequately meet the child's educational needs. For this reason, all children who are suspected of having communication problems shall be the subject of a Student Support Team (SST) to problem solve and implement strategies to determine and limit the adverse effect on the child's educational performance.
D) For **nonverbal or verbally limited** children and those with autism and/or significant intellectual, sensory, or physical disabilities, a multidisciplinary team of professionals shall provide a functional communication assessment of the child to determine eligibility for speech-language services. The multidisciplinary team shall consist of professionals appropriately related to the child's area of disability.
E) A child is eligible for placement in a speech-language program if, following a comprehensive evaluation; the child demonstrates impairment in one or more of the following areas: speech sound, fluency, voice or language that negatively impacts the child's ability to participate in the classroom environment. The present adverse effect of the speech-language impairment on the child's progress in the curriculum, including social and/or emotional growth, must be documented in writing and used to assist in determining eligibility.

Placement:
Placement in the Speech Language program shall be based on the results of the comprehensive assessment, and eligibility, along with all other pertinent information. Children shall not be excluded from a Speech-Language program based solely on the severity of the disability. Cognitive referencing (i.e., comparing language scores to IQ scores) is not permissible as the only criteria for determining eligibility for speech-language impaired services.

Traumatic Brain Injury

Traumatic Brain Injury (TBI) refers to an acquired injury to the brain caused by an external physical force, resulting in total or partial functional disability or psychosocial impairment, or both, that adversely affects the child's educational performance. The term applies to open or closed head injuries resulting in impairments which are immediate or delayed in one or more areas, such as cognition, language, memory, attention, reasoning, abstract thinking, judgment, problem solving, sensory, perceptual and motor abilities, psychosocial behavior, physical functions, speech and information processing. The term does not apply to brain injuries that are congenital or degenerative in nature, brain injuries induced by birth trauma.

Eligibility:

(1) Evaluation for eligibility shall include the following.
   (a) A summary of the child's pre-injury functioning status. This information may be available through previous formal evaluations, developmental assessments, achievement tests, classroom observations and/or grade reports.
   (b) Verification of the TBI through the following:
      1. A **medical evaluation** report from a licensed doctor of medicine indicating that TBI has occurred recently or in the past, or
      2. Documentation of TBI from another appropriate source, such as health department or social services reports, or parents' medical bills/records.
   (c) A **neuropsychological, psychological or psychoeducational evaluation** that addresses the impact of the TBI on the following areas of functioning:
      1. **Cognitive** - this includes areas such as memory, attention, reasoning, abstract thinking, judgment, problem solving, speed of information processing, cognitive endurance, organization, receptive and expressive language and speed of language recall.
      2. **Social/Behavioral** - this includes areas such as awareness of self and others, interaction with others, response to social rules, emotional responses to everyday situations and adaptive behavior.
      3. **Physical/Motor** - this includes areas such as hearing and vision acuity, speech production, eye-hand coordination, mobility and physical endurance.
   (d) Deficits in one or more of the above areas that have resulted from the TBI and adversely affect the child's educational performance shall be documented.

Placement and Service Delivery

The identification of **Traumatic Brain Injury** (TBI) for educational programming does not dictate a specific service or placement. The child with TBI shall be served by any appropriately certified teacher in any educational program, as specified in the child's Individualized Education Program (IEP) Team minutes.

Visual Impairment

A child with a visual impairment is one whose vision, even with correction, adversely impacts a child's educational performance. Examples are children whose visual impairments may result from congenital defects, eye diseases, or injuries to the eye. The term includes both visual impairment and blindness as follows:

(1) Blind refers to a child whose visual acuity is 20/200 or less in the better eye after correction or who has a limitation in the field of vision that subtends an angle of 20 degrees. Some children who are legally blind have useful vision and may read print.
(2) Visually impaired refers to a child whose visual acuity falls within the range of 20/70 to 20/200 in the better eye after correction or who have a limitation in the field of vision that adversely impacts educational progress.
   (a) Progressive visual disorders: Children, whose current visual acuity is greater than 20/70, but who have a medically indicated expectation of visual deterioration may be considered for vision impaired eligibility based on documentation of the visual deterioration from the child's optometrist or ophthalmologist.

Eligibility and Placement

(1) A current (within one year) **eye examination report** shall be completed and signed by the ophthalmologist or optometrist who examined the child.
   (a) A report from a neurologist in lieu of the optometrist/ophthalmologist report is acceptable for students who have blindness due to a cortical vision impairment.

(2) A **clinical low vision evaluation** shall be completed by a low vision optometrist for children who are not totally blind;
   (a) if the student is under the age of 8 and/or has a severe cognitive and/or physical disability that would make the use of low vision aids unfeasible, a functional vision evaluation may be used instead of a low vision evaluation to establish eligibility.
      1. The low vision evaluation should be completed by age 10 for children who do not have one during eligibility determination prior to age 8 unless other circumstances apply.
      2. The low vision evaluation is often difficult to schedule within the 60-day timeline, therefore, if children meet all other eligibility requirements, the eligibility report shall document the date of the scheduled upcoming low vision evaluation and the team may proceed with the eligibility decision.
      3. Once the low vision evaluation has occurred the eligibility information shall be updated, and as appropriate, the IEP.
   (i) The low vision evaluation must occur within 120 days of receipt of parental consent to evaluate to determine eligibility for visual impairment.

(3) A **comprehensive education evaluation** shall be administered to determine present levels of functioning. The impact of the visual impairment on the child's educational performance shall be considered for eligibility.
   (a) Educational assessments may include cognitive levels, academic achievement, and reading ability
      1. Educational assessments related to vision must be completed by a teacher certified in the area of visual impairments.
   (b) In some cases, comprehensive psychological evaluations may be indicated and must be completed by appropriately certified personnel.

(4) **Braille instruction** is always considered critical to appropriate education for a child who is blind. Children identified with visual impairments shall be evaluated to determine the need for braille skills. The evaluation will include the present and future needs for braille instruction or the use of braille. For children for whom braille instruction and use is indicated, the individualized education program (IEP) shall include the following:
   (a) Results obtained from the evaluation conducted for the purpose of determining the need for Braille skills;
   (b) How instruction in braille will be implemented as the primary mode for learning through integration with other classroom activities;
   (c) Date on which braille instruction will commence;
   (d) The length of the period of instruction and the frequency and duration of each instructional session; and
   (e) The level of competency in braille reading and writing to be achieved by the end of the period and the objective assessment measures to be used.

(f) For those children for whom braille instruction is not indicated, the IEP shall include a statement with supporting documentation that indicate the absences of braille instruction will not impair the child's ability to read and write effectively.

Professional Learning: Annually training will be provided to stakeholders in order to maintain continuity of practices and procedure and to ensure compliance and accountability.

Monitoring the Implementation: Annually each school will participate in an IDEA Procedure Review.

Technical Assistance: If areas of concern are noted during the IDEA Procedure Review a plan for technical assistance will be developed. The plan can include TKES and LKES documentation, as well as professional learning.

DISCIPLINE (STATE BOARD RULE: 160-4-7-.10)

Relationship of General Code of Conduct to IEP

The Code of Student Conduct for TCSS applies to all children unless a child's *Individualized Education Program* (IEP) specifically provides otherwise. TCSS ensures that the parents and the child with a disability receive notice of the rules and regulations applicable to children with disabilities with respect to child management, discipline and suspension/expulsion upon the child's entry into an exceptional education program or at the annual IEP review by providing the parent with procedural safeguards and providing explanation.

A staff member that witnesses or is informed that a student violates the code of conduct will complete the appropriate referral form and submit to an administrator.

The administrator will fully investigate the referral and then determine if/which consequence is appropriate.

The administrator will contact the parent and notify them of the incident and consequence.

Interim Alternative Settings and 10-Day Rule

Troup County School System personnel consider any unique circumstances on a case- by-case basis when determining whether a change in placement, consistent with the other requirements of this Rule, is appropriate for a child with a disability who violates a code of student conduct. School personnel may remove a child with a disability who violates a code of student conduct from his or her current placement to an appropriate interim alternative educational setting or suspension, for not more than 10 consecutive school days (to the extent those alternatives are applied to children without disabilities), and for additional removals of not more than 10 consecutive school days in that same school year for separate incidents of misconduct (as long as those removals do not constitute a change of placement under this Rule). After a child with a disability has been removed from his or her current placement for 10 school days in the same school year, during any subsequent days of removal the school system will provide services to the extent required under this Rule.

If a discipline event results in any decision to change the placement of a child with a disability because of a violation of a code of student conduct a Manifestation Determination Meeting must be held within 10 days of the change in placement.

For disciplinary changes in placement that would exceed 10 consecutive school days, if the

behavior that gave rise to the violation of the school code is determined **not** to be a manifestation of the child's disability, school personnel may apply the relevant disciplinary procedures to children with disabilities in the same manner and for the same duration as the procedures would be applied to children without disabilities, except the student with a disability must continue to be receive his/her free and appropriate public education.

The conduct must be determined to be a **manifestation** of the child's disability if the school system, the parent, and relevant members of the child's IEP Team determine that the conduct in question was caused by, or had a direct and substantial relationship to, the child's disability; or

the conduct in question was the direct result of the school system's failure to implement the IEP. If the school system, the parent, and the relevant members of the child's IEP Team determine that the conduct in question was a direct result of the failure of the school system to implement the IEP, the system will take immediate steps to remedy those deficiencies.

Manifestation Determination

If TCSS, the parent, and relevant members of the IEP Team make the determination that the conduct was a manifestation of the child's disability, the IEP Team will either conduct a **Functional Behavioral Assessment** (unless a *Functional Behavioral Assessment* conducted before the behavior that resulted in the change of placement occurred is already in place and found to be effective) and implement a **Behavioral Intervention Plan** for the child; or if a Behavioral Intervention Plan already has been developed, review the Behavioral Intervention Plan, and modify it, as necessary, to address the behavior, and (except as provided in the Special Circumstances described below), return the child to the placement from which the child was removed, unless the parent and the school system agree to a change of placement as part of the modification of the Behavioral Intervention Plan.
The administrator or designee schedules a manifestation meeting with the Exceptional education Coordinator or designee, parent, and relevant team members.

Manifestation Determination Review Steps for Student Case Manager:

1. Be sure all paperwork in the file is current before the incident occurred (504 plan, IEP, psychological, eligibility, discipline record, BIP data, etc.).
2. Have each teacher of the student write an observation if they cannot attend the meeting.
3. Make a copy of the relevant data for each member of the manifestation team and have a copy of parent rights printed out to give the parent.
4. If there is a behavior plan in place, make sure all data collection is current.
5. Make sure all teachers have a copy and have been implementing the BIP and IEP accommodations prior to the Manifestation Determination Review.
6. If suspension is going to reach the 11th day, call the Exceptional education Department to set a Manifestation Determination Review and notify the parents of rights and meeting time options.
7. The Manifestation Determination Meeting must be held within 10 days of a potential change in placement.

Special Circumstances

School personnel may remove a child to an **interim alternative educational** setting (determined by the IEP Team) for not more than 45 school days without regard to whether the behavior is determined to be a manifestation of the child's disability, if the child:

1. Carries a weapon to or possesses a weapon at school, on school premises, or at a

school function;
2. Knowingly possesses or uses illegal drugs or sells or solicits the sale of a controlled substance; or
3. Has inflicted serious bodily injury upon another person while at school, on school premises, or at a school function under the jurisdiction of the State or the school system.

Unique Circumstances on a case-by-case basis

There may be unique situations that may require the parent, administrative team and district leaders meet to discuss all options for a student that has chronic discipline.

Notification

On the date on which the decision is made to make a removal that constitutes a change of placement of a child with a disability because of a violation of the TCSS Code of Conduct, the school system will notify the parents of that decision, and provide the parents the Procedural Safeguards Notice/Parent Rights in Exceptional Education.

Appeal

The parent of a child with a disability who disagrees with any decision regarding placement or the manifestation determination under this Rule, or if the TCSS believes that maintaining the current placement of the child is substantially likely to result in injury to the child or others, may appeal the decision by requesting a hearing. If the Administrative Law Judge or Hearing Officer determines that the removal of the child was a violation of his rights or that the child's behavior was a manifestation of the child's disability, the Administrative Law Judge or Hearing Officer can order a change of placement of the child with a disability to an appropriate interim alternative educational setting for not more than 45 school days if it is determined that maintaining the current placement of the child is substantially likely to result in injury to the child or to others. These appeal procedures may be repeated, if the school system believes that returning the child to the original placement is substantially likely to result in injury to the child or to others.

Placement during Appeals

When an appeal has been made by either the parent or the school system, the child must remain in the interim alternative educational setting pending the decision of the Administrative Law Judge or Hearing Officer or until the expiration of the 45 school day time period provided for in this Rule, section 5, Special Circumstances, whichever comes first, unless the parent and the school system agree otherwise.

Protections for Children Not Yet Eligible for Exceptional education and Related Services

A child who has not been determined to be eligible for exceptional education and related services and who has engaged in behavior that violates a code of student conduct, may assert any of the protections provided for in this Rule if the school system had knowledge (as determined in accordance with this Rule) that the child was a child with a disability before the behavior that precipitated the disciplinary action occurred.

1. The school system must be deemed to have knowledge that a child is a child with a disability if before the behavior that precipitated the disciplinary action occurred:
   (i) The parent of the child expressed concern in writing to supervisory or administrative personnel of the appropriate educational agency or a teacher of the child, that the child is in

need of exceptional education and related services;
(ii) The parent of the child requested an evaluation of the child;
(iii) The teacher of the child or other personnel of the school system expressed specific concerns about a pattern of behavior demonstrated by the child directly supervisory personnel of the school system.

2. The school system would not be deemed to have knowledge that a child is a child with a disability if the parent of the child has not allowed an evaluation of the child or has refused services or the child has been evaluated and determined not to be a child with a disability based on exceptional education eligibility rules.
3. If the school system does not have knowledge that a child is a child with a disability prior to taking disciplinary measures against the child, the child may be subjected to the disciplinary measures applied to children without disabilities who engaged in comparable behaviors.
4. If a request is made for an evaluation of a child during the time period in which the child is subjected to disciplinary measures, the evaluation will be conducted in an expedited manner. Until the evaluation is complete, the child remains in the educational placement determined by school authorities, which can include suspension or expulsion without educational services. If the child is determined to be a child with a disability, taking into consideration information from the evaluation conducted by the school system and the information provided by the parents, the school system will provide exceptional education and related services.

Referral to Law Enforcement and Judicial Authorities

Nothing in the State Board of Education rules regarding discipline for a student with disabilities prohibits the TCSS from reporting a crime committed by a child with a disability to appropriate authorities or prevents State law enforcement or judicial authorities from exercising their responsibilities with regard to the application of Federal and State law to crimes committed by a child with a disability.

Change of Placement due to Disciplinary Removal

For purposes of removals of a child with a disability from the child's current educational placement under the State Board of Education discipline rule, a change in placement occurs if:

1. The removal is for more than 10 consecutive school days, or
2. The child has been subjected to a series of removals that constitute a pattern
   (i) Because the series of removals total more than 10 school days in a school year;
   (ii) Because the child's behavior is substantially similar to the child's behavior in previous incidents that resulted in the series of removals, and;
   (iii) Because of such additional factors as the length of each removal, the total amount of time the child has been removed, and the proximity of the removals to one another.

The school system determines on a case-by-case basis whether a pattern of removals constitutes a change of placement.

1. This determination is subject to review through due process hearings and judicial proceedings.

Professional Learning: Annually training will be provided to stakeholders in order to maintain continuity of practices and procedure and to ensure compliance and accountability.
Monitoring the Implementation: Annually each school will participate in an IDEA Procedure Review.

Technical Assistance: If areas of concern are noted during the IDEA Procedure Review a plan for technical assistance will be developed. The plan can include TKES and LKES documentation, as well as professional learning.