**Walton County School District**

# Nita M. Lowey 21st Century Community Learning Centers

**Operations Manual**
**FY27**



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# Walton County 21st Century Community Learning Center Operations Manual

The 21st Century Community Learning Centers provide academic and enrichment opportunities during non-school hours for children. The programs provide a safe environment for academics, particularly for math, language arts, and reading through enrichment. The focus is on embedded learning through real-world projects and activities; and to supplement the day school in order to help children be successful in school and in life.

The program is voluntary and open to all students for registration but serves a target number of students. Because of this, there may be a waiting list. The purpose of the program is to provide activities that improve academic achievement, offer enrichment designed to reinforce and complement the regular school curriculum, and provide opportunities for families to be actively engaged in their child's education.

The centers expose lower income or lower performing students to opportunities and activities that would not normally be afforded to them. For students who have not been successful in the regular school day, more of the same is not likely to produce success. 21st Century Community Learning Center activities are often multi-disciplinary and designed to help students enjoy sessions where they simultaneously learn and master skills that have been giving them difficulty and translate this into improvement in the regular school day. Therefore, communication with school day staff and data is vital.

The Walton County School District operates three 21st Century Community Learning Center sites, grades K-5. Measurable goals and objectives are set and include improvement in test scores and classroom grades, improvement in behavior, improvement in class participation, and family satisfaction with the program. We offer parents numerous opportunities to participate in literacy events to learn ways to help their child succeed in school. Participating students receive a healthy snack (plus lunch in the summer) and transportation home is available each day.

## Policies and Procedures

21st Century Community Learning Centers (21st CCLC) shall follow all the policies set by the Walton County Board of Education and GaDOE Federal Programs Division (21st Century). 21st Century Community Learning Centers may also set procedures used only by 21st Century Community Learning Center sites. These procedures may only be more stringent and not less stringent than present policies and procedures set by the Walton

County Board of Education. Policies and Procedures are communicated regularly to the 21st Century Advisory Council, site staff, day school staff and/or school administration.

# Oversight

Oversight of the 21st Century Programs at the schools is provided by Site Coordinators and the Program Director. The Program Director is responsible for staying up to date on Federal OMB circulars and 21st Century state regulations and communicating information to Site Coordinators. All staff receive professional development related to 21st Century and other related student/family topics, including After School Youth Development Standards. In addition, they participate in mandatory compliance training required by the Walton County School District. Supervision of the Site Coordinators is provided by the Program Director. Supervision of the Program Director is provided by the Assistant Superintendent. Chain of command: Site Staff to Site Coordinator, Site Coordinator to Program Director, Program Director to Assistant Superintendent and 21st Century State Staff (at GaDOE).

# Period of Performance and Availability

**(2 CFR §200.77, 200.309, 00.403(g); 34 CFR §76.707)**

The intent of federal funds is to benefit students in that fiscal year through the grant period as indicated on the Grant Award Notice (GAN). Upon receiving a grant, a copy of the award letter is given to the Finance Director and the Chief Financial Officer. The budget is not released until the date specified on the award letter; and approved by the state. All amendments and extensions are copied to the Director of Finance. The year-to-date budget is monitored monthly by the Program Director to make sure funds are spent within the time availability and at a rate consistent to cease with the end of the grant awards period. 21st Century grant awards must be annually accepted and approved by the Board of Education. Programs must operate for the total number of hours and days as described in the approved grant. WCSD will comply with 21st Century grant administration procedures from award notification to close-out in accordance with all applicable laws and regulations.

# Subrecipients

There are no subrecipients to WCSD 21st Century Community Learning Centers funds.

# Supplanting

21st Century Community Learning Center funds will be used to provide services not being provided by Title I or any other Federal, State or local funds that the Walton County School District (WCSD) or the contributing partners might receive. 21st Century Programs run parallel to other programs. Funds will **supplement** (increase) other funding **not supplant** (replace). WCSD cannot use 21st Century Community Learning Center funds to supplant funds that would, in the absence of 21st Century Community Learning Center funds, have been spent on participating students. No other funding

sources provide similar services. However, if other funding sources did provide similar in previous year(s), the current level of services must have increased in proportion to the level of 21st Century Program share.

# Fiscal Management

21st Century follows the policies and procedures for fiscal management including tracking of 21st Century Community Learning Center funds as adopted by the Walton County Board of Education. Walton County School District shall follow the budgeting and accounting procedures found in the Financial Accounting Handbook or other guidance published by the State Board of Education. The Program Director must adhere to the Chart of Accounts and corresponding guidance found on the GaDOE website (also supplied in the 21st Century Subgrantee Operations Manual).

# Cash Management (2 CFR §200.302(b)(6), §200.302(b)(1),§200.305)

All School District bank accounts are opened under the District's Federal Tax Identification Number. Each bank account has a corresponding cash account in the accounting system, set up by the CFO, to record all transactions. These transactions flow directly to the general ledger. Bank statements are reconciled monthly to the cash accounts on the general ledger. Bank reconciliations should be signed and dated by the preparer. The preparer's supervisor or supervisor's designee must also sign and date the bank reconciliation, indicating their review of the reconciliation. There are no fees or other income for WCSD's 21st Century Community Learning Centers.

21st Century grants are administered on a reimbursement or draw down basis. The District does not receive the grant funds in advance. Reimbursement drawdowns are made based on actual expenditures incurred for a reporting period. Federal and state grants, including 21st Century, with the Georgia Department of Education are reimbursed through the Grants Accounting Online Reporting System (GAORS). The Accountant will submit drawdown requests each month for all state and federal grants. A Year-to-Date Budget Report is run after the final monthly payroll is posted to confirm expenditure draw amounts and used to submit the monthly draw request through GAORS. The draw request forms are approved by the Director of Budget and Finance.

21st Century accounting information is tracked separately for each grant award. Identification Title IV-B, 21st Century Community Learning Centers, CFDA Number (84.287), Cohort Year, Fiscal Year, Program Name, Sub-grant Number, LUA Fund Code. A completion report is submitted to GA Dept. of Education, 21st Century Division at the end of the grant award period for each year through the Grants Application. Records are retained for a period of 5 years after the award cycle expires. The retention period for records begins on the day that the sub-grantee submits the final Completion Report to GaDOE or on October 31, whichever date is earlier. Fiscal Records are stored in the Budget/Finance Office. Program Records are stored in the Grants Department (electronic

and hard copy). Electronic records are stored in Finance Systems and records are also backed up to the district's network.

# Allowability of Cost (2CFR §200.302(b)(7)

21st Century purchases must follow funding guidelines for allowable costs. WCSD follows guidelines as detailed in EDGAR, OMB Circulars, and applicable memos, letters, handbooks and/or other communication regarding allowable/unallowable purchases provided by the Georgia Department of Education. The Program Director will direct any questionable expenses to the 21st Century Finance Analyst for further clarification. All costs must be necessary, reasonable, and allocable and must be adequately documented. To determine whether a cost is reasonable, the following questions should be answered: 1) Do we really need this? 2) Is this directly related to the program needs? 3) Do we have the capacity to use it? 4) Is the price fair? The Program Director has the responsibility of determining allowability of purchases. Considerations when making allowability determinations include:

- Does the purchase align with prioritized needs?
- Does the purchase align with the purpose of the program?
- Does the purchase meet the "supplement not supplant" requirements?
- Is the purchase necessary and reasonable?
- Can the purchase be adequately documented?

A cost is considered ***reasonable*** if, in its nature and amount, it does not exceed that which would be incurred by a prudent person under the circumstances prevailing at the time the decision was made to incur the cost. A cost is considered ***necessary*** if it meets an existing, documented need. A cost is considered ***allocable*** if the goods or services being purchased are chargeable or assignable in accordance with relative benefits received and consideration should be given as to whether the cost is being incurred specifically for that federal program and necessary for operation of the program.

WCSD 21st Century funds will only be used to pay for authorized items and activities to meet the needs of participating students and families. Purchases must be openly negotiated and/or researched so as to provide the best quality, price, and service for the students, including contracts with organizations to provide services. All purchases must be approved by the Program Director prior to purchase and be purchased via the P.O. process underneath the fiscal agency's internal controls. Costs will conform with federal law and grant terms, be incurred in accordance with the pre-approved budgets, and be consistent with state and local policies and procedures that apply uniformly to both federally financed and other activities of the non-federal entity.

Costs are tracked through budgets which are set up with specific items and services to be paid from each line. The budgets are set up in the local accounting system – MUNIS – and must match the approved budget in the Consolidated App. Budget Amendments must be approved by the Program Director, Superintendent, Co-applicant (if applicable) and GaDOE. Schools are not given access to 21st CCLC budgets to make purchases without

going through the Program Director, nor are they given access to certain lines such as personnel and benefits. If the school wants to buy something not specifically named in the grant it must be approved by the Program Director.

Costs are adequately documented. The Program Director approves all purchases. Amendments will be submitted and approved by GaDOE as required by the federal award when necessary. Documentation of all funds management is located in the school district's accounting software (MUNIS). Costs will only be incurred during the period of performance for the grant award. Costs incurred before the award must be authorized by the awarding agency. Financial records adhere to Generally Accepted Accounting Principles (GAAP) and WCSD is audited annually to ensure that all costs are in accordance with GAAP. If an external auditor is used, the cost of the audit shall be paid from the funds being audited using an accounting system that complies with GAAP.
21st Century Community Learning Center is a reimbursement grant and all reimbursements are based only on actual expenses charged to the grant. 21st Century Community Learning Center is charged net cost – meaning that any discounts, refunds, credits, or other adjustments to purchase costs will be allocated back to the grant to ensure no overpayments are made. Costs must be accorded consistent treatment. Costs will not be charged to the federal award as a direct cost if other costs associated with the same purpose were charged as an indirect cost. WCSD federal programs are treated equally, and indirect costs are charged based on the percentages set forth by the Georgia Department of Education. All charges are applied using the same calculations. Costs incurred and charged to a federal award will not be used to match or as in cost sharing requirements for other federal awards of the organization in either current or a prior period. The organization uses contributions for matches that are required by awards.

Federal funds can never be used to purchase incentives for students, teachers, or to entice participation in professional learning activities. Food for parent involvement activities must be considered "light refreshments" and approved by the 21st Century Fiscal Analyst. Light refreshments are defined as donuts, fruit, muffins, juice, coffee, chips, pretzels, popcorn, raw vegetables and dip, nuts, cookies, brownies, punch, soda, and water. Light refreshments do not include pizza, sandwiches, or anything that could be considered any part of a meal. Federal funds can only be expended for those events that "build capacity." This means you can fund a snack for a workshop teaching parents a specific skill but could not give snacks to parents volunteering.

The 21st Century Program Director pulls a year-to-date budget report monthly to monitor expenditures and to check for compliance. The Program Director works with the Accountant and Director of Budget and Finance to ensure that the budgets are set up properly, keep accounting data reconciled, and follow grant guidelines. The Program Director attends all training on federal, state and local grants on program and budget management. Regular meetings are held with Site Coordinators of 21st Century Community Learning Centers to ensure grant guidelines and budgets are being followed. The Program Director will contact the Fiscal Analyst or consult EDGAR if there is a question about whether or not a purchase is allowable. WCSD will conform to any exclusions or limitations as set forth by the 21st Century grant.

# Program Income

**Presently, there are no fees or other income for 21st Century Community Learning Centers.** Walton County School District 21st Century does not implement a fee-based program. No student or family is required to pay for 21st Century services.

Walton County Board of Education requires that all funds received from any sources for student activities shall be expended solely for the purpose of the project, including school related incidental expenses incurred by teachers and other school personnel. All purchases and/or contracts for or on behalf of students shall be made in accordance with the procedures of the district. Principals are required to submit quarterly reports to the Superintendent showing all receipts and disbursements from student funds. The principal of each school shall establish and maintain under his or her control a bank account for the deposit of all funds derived from any activity occurring within each school or a separately numbered account for each activity, including clubs, athletics, or other student activity generating funds.

The principal shall also establish a general fund or account for all profits received from the sale of soft drinks, pictures, or undesignated fund-raising activities. The general fund or account shall be expended only for programs or activities within the school where the funds were raised unless the Board of Education has granted its prior approval. The principal shall be responsible for the integrity of each account of the local and pupil funds accounts and ensure that all funds are properly deposited. The school principal and district superintendent are the only two individuals authorized to sign school activity fund checks. Districts are allowed, with GaDOE approval, to consolidate federal ESSA grant funds from several programs in order to pay for the costs associated with the administration of those programs. However, Walton County School District does not consolidate funds.

# Segregation of Duties (GAO-14-704G)

The Walton County School District requires the following segregation of duties associated with cash management to prevent errors and fraud. All of these positions are at the Board of Education and not in the schools:

## *Chief Financial Officer (CFO)*

**Under the supervision of the Superintendent, the CFO will**

- Prepare monthly and annual financial statements for inspection by the Board of Education.
- Establish accounting procedures to ensure that proper internal controls are maintained for the district business office.
- Manage cash flow and investment of available funds.

- Deliver central office bank deposits to the bank.
- Monitor and approve the collection and expenditure of funds in compliance with local, state and federal requirements.
- Assist the Superintendent in preparation of financial data for the tax digest, state allotments and other financial areas.
- Oversee the reconciliation of accounts.
- Supervise operation of the business office to include payables, purchasing, payroll, general ledger and school accounting.
- Compile annual budget for board approval and submit to the GA Department of Education.
- Coordinate accounting procedures to ensure that central office and local school administration follow proper procedures in the budgeting, record keeping and expending of program funds for which they are responsible.
- Oversee, approve and post monthly and year-end adjustments, run and balance reports to the GA Department of Audits and Accounts and the GA Department of Education.

## *Director of Finance*

**Under the supervision of the CFO, the Director of Finance will**

- Assist in the implementation of accounting procedures by maintaining accurate records and internal controls throughout the system and ensuring compliance with all applicable regulatory requirements.
- Enter journal entries and approved budget amendments into the financial accounting software.
- Approve journal entries entered by the Accountant and Financial Secretary.
- Approve cash receipts for all central office cash deposits.
- Approve central office bank reconciliations that are prepared by the Accountant and Financial Secretary.
- Approve grant drawdowns and reimbursement requests.
- Supervise accounts payable, general ledger and employee benefits area.
- System Administrator for online banking system.
- Monitor cask balances for all district accounts.
- Coordinate and assist with the preparation and submission of year-end and interim financial reports to the GA Department of Audits and the GA Department of Education.
- Prepares and maintains the “Guide to Financial Accounting & Internal Controls” manual for the district.
- Compile data for audit and work with auditors during audits.
- Assist with any duties required for annual audit preparation.
- Maintain a wide variety of financial records to ensure compliance and the availability of documentation.
- Oversee internal school audits.
- Oversee and manage employee benefits and workers’ compensation for the district.
- Administer Family Medical Leave for all employees.

- Perform other related duties as assigned by the CFO.

## *Accountant*

**Under the supervision of the CFO, the Accountant will**

- Request federal, state and local grant reimbursements.
- Ensure drawdowns are based on actual expenditures and minimize time between the transfer of funds.
- Submit annual completion reports on all federal and state grants.
- Monitor and verify grant fund cash receipts and enter accounts receivable.
- Complete bank reconciliations for central office accounts.
- Assist in the budget process.
- Review and serve as an approval if the level of the budget increases, decreases and transfers in the financial accounting software.
- Prepare, enter and post journal entries into the financial software.
- Compile data for audit and work with auditors during audit.
- Complete internal school audits.
- Prepare and submit year-end and interim financial reports to the GA Department of Audits and Accounts and the GA Department of Education.
- Record payroll accruals and reversals at year end.
- Run reports for Program/Department Directors as needed.
- Maintain federal grant award records.
- Perform other related duties as assigned by the CFO.

## *Payroll Clerk*

**Under the supervision of the CFO, the Payroll Clerk will**

- Maintain and process semi-monthly payroll and reporting for all system employees.
- Transmit direct deposit, tax payments and other payroll vendor payments by the deadlines.
- Prepare quarterly and year-end reporting, including W-2's.
- Calculate sick leave for retirement
- Calculate salary adjustments.
- Establish and maintain employee payroll files.
- Complete verification of employment, income and leave.
- Compile data for audit work and work with auditors during audit.
- Perform other duties as assigned by the CFO.

## *Payroll Coordinator*

**Under the supervision of the CFO, the Payroll Coordinator will**

- Oversee all aspects of payroll management and maintenance.
- Maintain salary schedules for all employees.
- Proof and edit payroll prior to each semi-monthly payroll.
- Complete verification of employment, income and leave.
- Supervise payroll clerks.

- Transmit direct deposits, tax payments and other payroll vendor payments by deadlines.
- Prepare and transmit monthly retirement and annuity reports.
- Reconcile quarterly and year-end tax reporting for W-2 preparation.
- Assist with budget preparation.
- Compile data for audit and work with auditors during audit.
- Perform other duties as assigned by the CFO.

## *Procurement and Fixed Asset Specialist*

**Under the supervision of the CFO, the Procurement and Fixed Asset Specialist will**

- Manage the procurement and purchasing function of the district to include intake of requisitions, converting requisitions to purchase orders, working with designated purchasing personnel and bookkeepers in regard to purchasing and receiving goods
- Manage fixed assets financial accounting software of the district as it relates to the capitalization policy of the district.
- Maintain approved vendor list
- Monitor purchase requisitions to determine correctness of information, price extensions and account coding.
- Review, convert and approve all purchase orders.
- Obtain and study comparative processes and quotations.
- Assist and prepare Requests for Proposals and bid requests.
- Post fixed assets to the general ledger.
- Prepare binder with reports and spreadsheets of fixed assets and construction in progress for annual audit.
- Compile data for audit and work with auditors during audit.
- Perform other duties as assigned by the CFO.

## *Accounts Payable Clerk*

**Under the supervision of the CFO, the Accounts Payable Clerk will**

- Verify validity of expenditures within budget authority and availability of funds.
- Review and seek approval for vendor invoices and employee reimbursements.
- Reconcile and audit employee travel reimbursement requests.
- Enter and post invoices for payment.
- Proof and verify other accounts payable clerk batches prior to weekly check run. (Each clerk will take another clerk's batch and verify the proof report against invoices).
- Monitor open payables and pay invoices as they become due.
- Maintain files and monitor open purchase orders, travel payments and contracted services.
- Reconcile, balance and post monthly procurement card transaction log statements.
- Maintain check/EFT number log for all bank accounts.
- Prepare year-end reporting, including 1099's.
- Perform other duties as assigned by the CFO.

## *Financial Secretary*

**Under the supervision of the CFO, the Financial Secretary will**

- Complete internal school audits.
- Assist school and department personnel with interpreting financial policy and procedure.
- Train school bookkeepers and other users on financial accounting software.
- Complete bank reconciliation for the school nutrition program.
- Prepare bank deposits for central office bank accounts.
- Record receipt of all incoming cash funds by journal entry in the financial accounting software.
- Prepare the monthly invoice to schools for reimbursement of local pupil activities funds paid from operating cash.
- Assist in school budgets and record school budgets into financial software.
- Perform other duties as assigned by the CFO.

## *Program Director, 21st Century Community Learning Centers (Title IV-B)*

**Under the supervision of the Assistant Superintendent for Curriculum and Instruction, the Program Director of 21st Century Community Learning Centers will**

- Coordinate, monitor and provide technical assistance to schools.
- Monitor all purchases to ensure that expenditures are allocable, reasonable and necessary.
- Ensure all system policies for purchasing expending funds, and inventory are followed to avoid fraud, waste, abuse and corruption. No items will be purchased without prior approval and all items purchased must fall within the approved budget.
- Approve each purchase order requisition/order, travel expenses statement, professional learning costs, and all invoices.
- Meet with Finance Department personnel as needed and request financial reports to ensure financial alignment and balance on at least a monthly basis.
- Monitor accounting system (MUNIS) at least monthly (YTD reports, tracking spending and assuring accuracy.
- Inputs approved budgets into Consolidated Application and ensures MUNIS and Consolidated Application match.
- Creates budget amendments when necessary.
- Ensure school employees are trained on his/her responsibilities regarding fraud and the channels to report it if suspected.
- Attends all training on federal, state and local grants on program and budget management.
- Meet with Site Coordinators of 21st Century Community Learning Centers to assure grant guidelines and budgets are being followed.
- Work with Fiscal Analyst and/or EDGAR concerning budgets, approval for technology purchases, field trip costs and professional development costs (if applicable or if there is a question about whether a purchase is allowable.
- Review and approve monthly Requests for Reimbursements prior to submitting to GA Department of Education.

- Assist auditors by providing supporting documentation and/or information on internal processes.

## *21st Century Program Coordinator/Administrative Data Clerk*

**Under the supervision of the 21st Century Program Director, the 21st Century Administrative Data Clerk will**

- Maintain accurate records and files (electronic and hard copy), ensuring compliance with applicable regulatory requirements and accuracy of fund balances.
- Assist Program Director with budget by performing budget transfers and inputting the Consolidated Application budget into the local accounting system (MUNIS).
- Enter requisitions into MUNIS and monitor Purchase Orders.
- Receive supply orders, checks for accuracy against purchase orders, receipts the orders into MUNIS prior to delivering to schools.
- Ensure district inventory system (In-Trac) is current and input new inventory into the system
- Complete physical inventory check at facilities each year; keeps inventory sign-off forms
- Run reports for the Program Director to help monitor expenses.
- Assist auditors by providing supporting documentation and/or information on internal processes.

## *Director of Federal Programs*

**Under the supervision of the Assistant Superintendent for Curriculum and Instruction, the Director of Federal Programs will carry out the following duties related to *Title I-A, Title I-C, Title III-A, and Title IV-A**

- Coordinate, monitor and provide technical assistance to schools.
- Monitor all purchases to ensure that expenditures are allocable, reasonable and necessary.
- Ensure all system policies for purchasing expending funds, and inventory are followed to avoid fraud, waste, abuse and corruption. No items will be purchased without prior approval and all items purchased must fall within the approved budget.
- Approve each purchase order requisition/order, travel expenses statement and professional learning leave.
- Meet with Finance Department personnel as needed and request financial reports to ensure financial alignment and balance on at least a monthly basis. Meet with principals to ensure accuracy of school budgets.
- Ensure system and school inventories are maintained and up to date.
- Complete or coordinate completion of a physical inventory check at facilities each year.
- Ensure school employees are trained on his/her responsibilities regarding fraud and the channels to report it if suspected.

### *Federal Programs Administrative Assistant*

**Under the supervision of the Director of Federal Programs, the Federal Programs Administrative Assistant will carry out the following duties related to *Title I-A, Title I-C, Title III-A, and Title IV-A**

- Monitor purchase orders and invoices.
- Maintain accurate records ensuring compliance with all applicable regulatory requirements and accuracy of fund balances.
- Works with the Finance Department in processing purchase requisitions, travel expenses, verifying available funds for accounts charged to system accounts and payment of invoices.
- Assists with Consolidated Applications budgets.
- Assists with database activities related to the district financial system (MUNIS).
- Assists auditors by providing supporting documentation and/or information on internal processes related to Title I-A, Title I-C, Title III-A, and Title IV-A.

### *Coordinators of Title II-A, EHCY*

**Under the direction of the Assistant Superintendent for Curriculum and Instruction, the Federal Program Coordinators will**

- Coordinate, monitor and provide technical assistance to schools.
- Review and authorize all expenditures and reconcile costs charged to the respective federal program.
- Ensure all system policies for purchasing expending funds, and inventory are followed to avoid fraud, waste, abuse and corruption. No items will be purchased without prior approval and all items purchased must fall within the approved budget.
- Approve each requisition/purchase order, travel expense statement and professional learning that is funded through the respective federal program. Meet with the Finance Department as needed and request financial reports to ensure alignment and balance. Communicate with principals or designees to ensure accuracy of approved budgets.
- Assist auditors by providing supporting documentation and/or information on internal processes.

# Conflict of Interest (2 CFR 200.318(c)(1)

It is the policy of WCSD and WCSD 21st Century to avoid doing business with individuals or organizations who have a conflict of interest or the appearance of a conflict of interest. Employees of the Walton County School District who are engaged in the selection, awarding, and/or administration of contracts and/or grant awards shall abide by the following:

- No employee, officer, or agent may participate in the selection, award, or administration of a contract supported by a federal award if he or she has a real or apparent conflict of interest.
- Such a conflict of interest arises when the employee, officer, or agent, any member of his or her immediate family, his or her partner, or an organization

which employs or is about to employ any of the parties indicated herein, has a financial or other interest in or a tangible personal benefit from a firm considered for a contract.

- Instances where conflict of interest may occur shall include those of the grant applicant, its affiliates, proposed consultants, subcontractors, or other key personnel. Past interest shall be limited to within one year of the date of the applicant's grant proposal and include any person owning more than 20% interest in the applicant, an applicant's corporate officers, board members, senior management, any employee who is responsible for making decisions or taking action on the application or any resulting agreement where the decision or action can have an economic of other impact on the interests of a regulated or affective organization.
- Officers, employees, and agents of the Walton County School District may neither solicit nor accept gratuities, favors, or anything of monetary value from contractors or parties to subcontracts.
- 21st Century employees shall not accept payment from booster clubs, parent organizations or groups, students, or parents of students. Employees shall not solicit sales from students or their parents or advertise or endorse products or services aimed at students or their parents. In-kind and cash donations can be made by community partners. If cash is donated, the donation is kept in a separate account line and used strictly for 21st Century services.
- Employees may not charge 21st Century Community Learning Center participants for tutoring.
- Unless a clinic, camp, or similar activity is officially sponsored by the school district and approved by the Board of Education, employees who have prior approval of the board to conduct clinics, camps, etc., and wish to use school district property must lease such property from the Board of Education.
- Employees shall maintain integrity with students, colleagues, parents, patrons, or businesses.
- Violation of these standards will result in reporting of said personnel to the Superintendent of Schools and if appropriate, local authorities. Any misconduct could result in suspension, loss of employment, and any other consequences that are applicable by law.
- Any violation of these procedures must be disclosed in writing, in a timely manner. All violations of federal criminal law involving fraud, bribery, or gratuity violations potentially affecting the federal award must be reported as failure to make disclosures can result in (remedies for noncompliance, including suspension and debarment).

# Compensation (2 CFR §200.430)

All employees (regular staff and substitutes) are paid for services rendered only **during the period of performance** under the Federal award. Compensation includes salary, wages, stipends - but may also include fringe benefits (including, but not limited to,

leave, insurance, pensions, unemployment benefits). Salaries and benefits must be reasonable to the services rendered, lawful and conform to the established district policy. Compensation must apply uniformly for staff members who work the same job. 21st Century staffs both certified and non-certified employees. All site staff and substitutes are hourly employees and do not receive fringe benefits. If 21st CCLC employees do receive fringe benefits, they are offered by BOE policy.
Under **2 CFR §200.430. (i)(1),** charges to federal awards for salaries and wages must be based on records that accurately reflect the work performed. These records must:

- Be supported by a system of internal controls which provides reasonable assurance that the charges are accurate, allowable and properly allocated
- Be incorporated into official records
- Reasonably reflect total activity for which the employee is compensated, not exceeding 100% of compensated activities
- Encompass both federally assisted and other activities compensated by the district
- Comply with established accounting policies and practices non-federal entity
- Support the distribution of the employee's salary or wages among specific activities or costs objectives

WCSD utilizes KRONOS. All program employees are set up in KRONOS and must clock in and out using the KRONOS time clock, by a fingerprint scan. This creates official electronic time and attendance records which are maintained in the system. The Administrative Data Clerk runs (at minimum) monthly reports from KRONOS that shows hours clocked and the account number which includes the location, function, object and program. The Program Director reviews the reports to ensure accuracy (account number, days/hours worked). If applicable, issues are addressed between the Program Director, Administrative Data Clerk, the respective staff member(s), Site Coordinator and the district's Payroll Department. Clock issues (such as missed punches) are adjusted manually through payroll. KRONOS reports also reflect separate account numbers for internal, classified employees to differentiate total work activity. Contract employees do not clock in during the day. However, certified day teachers who work in the 21st Century program must still clock in for their time in the 21st Century program. Reports are maintained electronically in the system by the Payroll and Finance Department. All wage payments to employees must be paid through payroll and coded with the appropriate expenditure account number.

# Nepotism

When two employees live in the same household or are from the same immediate family, it is the policy of this board that no employee may be the direct supervisor of a member of his or her household or immediate family. For the purpose of this policy, immediate family shall include spouse, mother, father, brother, sister, children, nieces, nephews, aunts, uncles, grandparents, grandchildren, or in-law equivalents of any of the foregoing relatives or any other relative living in the household. The Program Director will have the right to recommend a transfer for a 21st CCLC employee should concerns arise from the employees working in the same location.

# Employment

Open positions are posted on the WCSD website. Site Coordinators may also recruit prospective applicants per program needs; however, all applicants must complete the online application. Applications are reviewed by and filtered through 21st Century Community Learning Center management. All applicants, including current certified teachers, are required to fill out an application and submit necessary paperwork for hiring. The Program Director pulls the applications from the Unified Employment job application portal and then reviews applications. Site Coordinators interview potential candidates and then refer them to the Program Director for an in-person interview which will be conducted by the Site Coordinator with the assistance of the Program Director (if requested). Once an offer is made (contingent on clear background check), the applicant attends an intake appointment. Intake includes completion of 21st Century Community Learning Center specific paperwork, along with a WCSD hire packet in the Human Resources Department.

A national background check is conducted and must be clear prior to actual hire. **Only** eligible applicants with **clear checks** are **employed**. **Internal (current Walton County School District) applicants** must also complete an online application, 21st CCLC policy documents, and the national background check form. Staff may not start working in the 21st Century Program until clearing the initial national background check. Additionally, all employees of the 21st Century Program must undergo an **annual national background check.** In the event the criminal record check reflects the employee, or volunteer has been charged with, pleaded to or been convicted of an offense other than a minor traffic violation, at the recommendation of HR, the Superintendent shall bring the matter to the Board of Education at its next meeting or sooner, if warranted, for a decision. If the Superintendent elects, the employee may continue in the employment of the school district's 21st Century Program pending final Board decision. All offenses not previously cleared by the Professional Standards Commission will be reported to the Professional Standards Commission. The employee will be required to provide documentation of all offenses previously cleared by the Professional Standards Commission. **All program personnel - new applicants, returning staff, contractors, program substitutes and volunteers - have a national background check and receive HR training before working with students on an annual basis.**

## *Time and Effort*

Charges to a federal fund for employee compensation, including salaries, wages, and benefits, must be based on records that accurately reflect the work performed. Employees who provide supplemental instruction outside of school hours must clock in under that specific activity and project. The appropriate Program Director will ensure that a semi-annual periodic certification or personnel activity reports are completed and maintained for all employees paid with federal funds.

A semi-annual periodic certification will be maintained for any employee who worked on one federal grant or one cost objective. These certifications will be completed

after-the-fact. The first certification will be completed on the last workday in December, and the second periodic certification will be completed at the end of the school year on the last day of June. The forms are signed by a supervisor having first-hand knowledge of the work performed by the employee and are kept on file in the office of the appropriate Program Director. A Personnel Activity Report (PAR) will be maintained for any employee who works on more than one federal grant and/or more than one cost objective (job). These "split-funded" personnel paid in any part with federal funds are required to maintain monthly time logs. The logs are signed by the employee and the appropriate Manager or Program Director. WCSD 21st Century employees may not work under another federal grant or cost objective. The only exception to this is 21st Century grant administration employees, who are split across other 21st Century grant cost objectives in the case of having more than one 21st Century grant.

# Stipends (GaDOE Rule 160-3-3.04)

Per GaDOE rule, a stipend is funds awarded by an LEA to certified personnel or paraprofessionals for having successfully completed learning opportunities that have occurred at any time during the fiscal year outside of the employee's normal contract/work hours.

WCSD employees may be paid stipends at the rate of $150 per day when the following criteria are met:

- The professional learning is part of the school or district improvement plan and approved by the school principal or department director
- The professional learning occurred outside of the contract day
- Appropriate documentation (agenda, sign-in sheet) are submitted
- All wage payments to employees, including stipends, must be paid through payroll and coded with the appropriate expenditure account number. No stipends may be paid from any local site/school source.

No stipends are paid by 21st Century funds. Additionally, 21st Century funds may not be used to pay any employee who is already receiving a stipend on any other activity that may be taking place during program hours.

# Travel (2 CFR §200.474(a)(b)

All travel must be preapproved by the Program Director and be in accordance with the GaDOE approved budget. The Walton County School District Travel Policy will be followed once approved. Employees of the Walton County School District will be reimbursed for actual and necessary travel expenses incurred in the performance of their official duties. Employees will also be reimbursed for travel expenses incurred while participating in staff development activities approved by the school district. Reimbursements for travel expenses will be made in accordance with the Statewide Travel Policy published by the State Accounting Office of Georgia. Travel reimbursement requests are sent to Accounts Payable for processing. The appropriate

reimbursement form is required to be typed, signed by the employee, and signed/approved by their supervisor. Itemized detailed original receipts should be attached to the form when appropriate. Travel reimbursement requests must be completed within 10 business days after the return to work or the expense is incurred. All reimbursements will be paid within 30 days of Accounts Payable receiving a complete, non-problematic form. Information required when requesting travel reimbursement includes:

- Itinerary/Agenda of the event attended (This should include the daily schedule of the individual)
- Registration receipt
- Meal expenses
- Lodging receipt
- Mileage, airfare receipt, rental car receipt, or a description of transportation used (i.e. bus with students)
- An explanation of any unusual expenses or expenses which exceed the established limits
- Explanation of the purpose of the trip
- Account numbers
- Employee signature and date
- Approval signature and date (From each department being charged)

Only when employees travel more than 50 miles from their home or headquarters may they be reimbursed for lodging expenses. Employees who must travel shall be responsible for obtaining the lowest rate possible by avoiding the "deluxe" hotels and motels. Eligible meals may be reimbursed on a per-dem basis designed to cover the cost of the meals (including the taxes and tips), based on the number of meals per day for which the employee is eligible. While reimbursement at the per diem rate is allowable, federal programs prefer that all receipts be attached to the travel expense report for verification and for future audit needs. Meal costs in excess of the state-determined per diem amount will not be reimbursed. Meal costs will also not be reimbursed if meals are provided as part of the workshop/conference. Travel expense reports may be selected for audit at any time, and all required receipts must be retained by the employee for three years after the travel date if not attached to the expense report. Travel costs that are charged directly to a federally funded source must have documentation justifying that participation of the individual is necessary to the federal program.

## *Mileage*

Mileage must be documented on a "Travel Expense Statement". According to State Travel Regulations, "Reimbursement for business use of a personally owned vehicle is calculated per mile, from point of departure after deduction for normal commuting mileage, based on the current reimbursement rate."

Employees may be reimbursed for the mileage incurred from the point of departure to the travel destination but NOT for their normal commuting mileage. During the normal workweek, the point of departure will be either the employee's residence or headquarters; whichever is nearer to the destination point. If leaving from the residence

you must deduct the normal commuting mileage to and from the worksite. Employees traveling by personal vehicles and requesting reimbursement must record the actual odometer readings on the expense statement. Parking fees and tolls paid may be reimbursed and employees are expected to obtain receipts for these expenses. If it is not possible to obtain a receipt, a written explanation should be included on the expense statement.

### *Lodging*

To receive reimbursement for lodging expenses, the following guidelines must be followed:

- Lodging must be documented on a "Travel Expense Statement"
- Employees are responsible for making their own reservations and guaranteeing them.
- Employees are responsible for submitting a copy of the tax exemption form for state and local hotel/motel excise taxes if staying at a hotel in Georgia. Any tax paid must have an explanation of why it was not waived. For example, "paid with personal credit card", "state does not allow" or "$5 State Hotel Motel Fee."
- Employees must travel more than 50 miles.

Employees should use the least expensive rates for lodging. Any rates that are above this require written authorization prior to the trip. Expenses must be broken down by date. Receipts are required.

### *Subsistence*

The following guidelines must be followed for the reimbursement of meals:

- Meal reimbursement cannot exceed the following: Breakfast - $6.00; Lunch - $7.00; Dinner - $15.00.
- Meal reimbursement for out of state overnight travel are generally eligible for per diem amounts designed to cover the cost of three (3) meals per day for all days on travel status other than the day of departure and the day of return. Employees are eligible for 75 percent (75%) of the total per diem rate on the first and last day of travel.
- Expenses must be broken down on the expense report per meal.
- Taxes and tips are allowed and should be included in the total. However, this total should not exceed the per meal rate.

# Drawdowns

Funds are drawn down from the state's Grants Accounting Online Reporting System (GAORS) based on actual program expenditures. No excess cash balances are maintained

at the district level. If the district must draw down greater than 10% of the total amount of any grant at one time, a written explanation will be provided to GaDOE.

- It is the responsibility of the appropriate Program Directors and Finance Department personnel to work cooperatively to review all expenditures monthly after budget approval before funds are drawn down from GAORS. Moreover, the following practices are observed:
- Coordinators for each federal program must reconcile their respective budgets monthly to ensure that all expenditures charged to their program are allowable.
- Finance Department personnel will perform periodic reviews of the general ledger, including federal accounts and fund sources.
- The Accountant will draw down funds monthly based on actual expenditures and on an after-the-fact, reimbursement basis only.
- The Finance Department personnel who process the drawdown from GAORS provides a copy of the drawdown report to the appropriate Program Director
- Once the drawdown funds are received into the district's bank account, Finance Department personnel create a journal entry in Munis.
- Finance Department personnel reconcile all bank statements and perform periodic review of the general ledger.
- Program Directors ensure that equipment/supplies are purchased and received during the period of performance of each grant award.

# Completion Reports

At the end of each fiscal year, Finance Department personnel generate a report from Munis that compares the total amount of the original grant award to the total amount of funds that were expended. The coordinator for each federal program reviews and signs off that the expenditure report and approved budget match and that a completion report can be entered and submitted to GaDOE. Completion reports are due to GaDOE no later than 30 days after the initial 15-month period of availability ends (i.e, October 30). Original completion reports are kept on file in the Finance Department and copies are provided to appropriate Program Directors.

# Procurement (2CFR §200.318; 2CFR §200.319; 2 CFR §200.320)

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

- Incorporating a clear and accurate description of the technical requirements for the material, product, or service to be procured. The description must not, in competitive procurements, contain features which unduly restrict competition. The description may include a statement of the qualitative nature of the material, product or service to be procured and, when necessary, must set forth those minimum essential characteristics and standards to which it must conform if it is to satisfy its intended use.

- Avoid providing detailed product specifications.
- When it is impractical or uneconomical to make a clear and accurate description of the technical requirements, a "brand name or equivalent" description will be used as a means to define the performance or other salient requirements of procurement. The specific features of the named brand which must be met by offers will be clearly stated.
- Identify all requirements which the offers must fulfill and all other factors to be used in evaluating bids or proposals.
- Ensure that all pre-qualified lists of persons, firms, or products which are used in acquiring goods and services are current and include enough qualified sources to ensure maximum open and free competition. The school system will not preclude potential bidders from qualifying during the solicitation period. Services will be adequately documented and necessary for the program.
- Correctness of information, price extensions and vendor list are updated regularly and provided to designees who purchase goods and services within the schools or central office.
- The procurement of goods and services must be in accordance with WCSD BOE Policy DJED –Operations related to the normal acquisition of goods and services shall reside in the Finance Department. When spending both local and federal funds, those who have been designated the responsibility for the purchase of goods and services shall utilize the highest standards for proper and ethical purchasing procedures. In further protecting the integrity of purchasing, competitive purchasing will be used whenever possible and prospective vendors shall be given equal consideration. The right of any vendor to compete shall not be unreasonably withheld.
- Guidelines of the National Institute of Governmental Purchasing (NIPG), the Institute for Supply Management (ISM) or similar national organizations shall be followed.

# Technical Evaluations of Proposals and Selecting Recipients (2 CFR 200.320(d)(3))

When spending federal funds, employees of the school district shall engage in comparative buying and obtain bids and quotes whenever appropriate. Large purchases are to be solicited using written quotations or formal solicitations. The detailed specification is to be provided in writing to at least three vendors known to be able to supply the goods or services needed, with the written responses and any notations made regarding those responses retained and evaluated. Large purchases require a cost or price analysis, sealed bids, and/or competitive proposals. Cost analysis means evaluating the separate cost elements that make up the total price, including profit. Price analysis generally means evaluating the total price.

21st Century Community Learning Centers posts open bids on the Procurement Page of the WCSD website. RFP's clearly state the project specifications and are broken out by grant. The Program Director is available to answer any questions and/or provide

information requested from a potential vendor who wishes to submit a bid. The same clarification information that is given to a potential bidder is sent to other bidders to assure consistency and fairness. A rubric scoring system is used to compare all submitted bids before selection is made. Proposals are reviewed and scored by the Program Director and impartial readers. Whenever possible, a minimum of 3 bids are reviewed.

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

WCSD 21st Century uses the following additional procurement methods:
**Micro purchase**: Acquisition of supplies of services, the aggregate dollar amount of which does not exceed $3000, may be completed without soliciting competitive quotations if the price is reasonable, and are distributed equally among qualified suppliers.
**Small purchase**: Acquisition of supplies or services, the aggregate amount of which is at least $3,000 but less than $25,000, may be solicited by telephone or Internet search. At least two vendors known to be able to supply the needed goods or services must be contacted, and a written log of the request and quotation must be made and retained.
**Written quotations**: Purchases of at least $25,000 but less than $100,000 are solicited using RFP process written quotations, and rubric scoring. Whenever possible, a minimum of 3 bids are reviewed.
**Formal Solicitations:** Purchases of $100,000 or more are solicited using formal solicitations and require sealed responses and public openings. This will include Invitations to Bid, Requests for Proposals, and related solicitation methods. A formal solicitation shall appear on the website continuously for at least four weeks prior to bid opening. Additionally, newspaper advertising must appear on at least two separate dates within ten days of posting the formal solicitation. If a mandatory pre-bid conference is being used, the second newspaper ad shall appear prior to that conference.
**Any purchases in excess of $150,000** including contract modifications will require a cost or price analysis, sealed bids, and/or competitive proposals. Cost analysis means evaluating the separate cost elements that make up the total price, including profit. Price analysis generally means evaluating the total price.
**Sole source bids:** Acquisition of services, supplies or other property through solicitation of a proposal from only one source will apply if:

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

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

The 21st Century Community Learning Center Program Director works with the Director of Finance to ensure that budgets are set up properly and follow grant guidelines. 21st Century Community Learning Center supply purchasing is managed by the 21st Century Administrative Data Clerk who works with the Procurement Department and utilizes the procedures set forth under district internal controls regarding purchasing. Purchase Orders are required prior to all purchases and contract work to be done by individuals or organizations. The Program Director approves all PO's prior to set up. The Site Coordinators and bookkeepers are notified by email of approval of requests.

# Invoices

**The following procedures will be used for Invoices**

- Receipt of Invoice: Invoice is received by district receptionist and forwarded to Account Payable Specialist who stamps the date and forwards it to the 21st Century Administrative Data Clerk.
- The 21st Century Administrative Data Clerk will match the invoice with the purchase order.
- If correct, the Program Director and Assistant Superintendent approve the invoice and it is delivered to Accounts Payable to be entered into the system and paid.
- The Accounts Payable Specialist charges the expenditures to the proper fund/program designated on the purchase order.
- Disbursement is not made until the invoice is validated as owned by the district.
- Discrepancies are worked out through the Program Director.
- Open purchase order reports are monitored by the 21st Century Administrative Data Clerk who checks the order and confirms whether goods or services have in fact been received but not invoiced by the vendor. Contact is made with the vendor to secure an invoice if such instances are noted.

No invoices are paid prior to services being rendered. They are checked against the purchase order and the budget and must be approved by the Program Director and Assistant Superintendent prior to payment. Processes and documentation of all aspects of cash management are kept in the district's accounting software (MUNIS). All Budget transfers have to be approved by the Program Director and Assistant Superintendent and PO's must be approved by the Procurement Coordinator. Anything unusual is either reported to the Program Director, Assistant Superintendent or Director of Finance immediately. Site Coordinators/21st Century Community Learning Centers have copies of OMB circulars and the lists of allowable and unallowable expenses.

# Expenditures

The Program Director and Assistant Superintendent sign approvals of expenditures, including invoices, reimbursements for phone, mileage or any allowable expense paid up front by individuals. WCSD has comprehensive internal controls established that are

strictly adhered to regarding personnel, asset management, procurement, inventory, bank reconciliation, bank transfers, cash receipts & receivables, accounting, cash disbursements, and budgets. This ensures 1) effectiveness and efficiency of operations, 2) reliability of financial reporting, 3) compliance with applicable laws and regulations, and 4) safeguarding assets to ensure they are used solely for the authorized purposes. Each budget is reviewed and approved by the Program Director. The budgets are input into the district accounting system (MUNIS) to match the Consolidated Ap. All expenditures require prior approval. Prior approval is obtained by completing a requisition in the school system financial software, MUNIS. Requisitions must include:

- Complete vendor information including phone number (and fax number if applicable)
- Ship to information including the address for the school
- Appropriate account number assigned by the system coordinator, principal or designee based on the budget sheets
- Sufficient detail to determine whether each item is allocable, reasonable, and necessary.
- If a bid process is required, all quotes must be obtained and attached to the requisition in Munis.

Upon completion, requisitions are sent electronically to the Program Director who reviews the requisition to assure that the purchase and process are correct and that the expense is allocable, reasonable, and necessary. If approved, the Program Director then signs off on the requisition which forwards the requisition to the Finance Department for approval and conversion to a purchase order. If rejected by the Program Director or by Finance Department personnel, a reason for rejection is entered into Munis and is then visible at the system level. The Chief Financial Officer issues final approval and Munis then automatically sends the approved purchase order to the originator of the requisition/purchase order (the 21st Century Administrative Data Clerk) to place the order. When the ordered item arrives, the Administrative Data Clerk reviews what is received, checks against the order, and "receives" the item(s) in Munis. Any disputes are reconciled between the 21st Century Administrative Data Clerk and the vendor under the supervision of the Program Director.

# Suspension & Debarment (2 CFR 180.220)

- Public school districts are subject to the nonprocurement debarment and suspension regulations implementing Executive Orders 12549 and 12689, 2 CFR part 180. 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, including school funding.
- Each Program Director is responsible for checking the System for Award Management (SAM) database, found at https://www.sam.gov/portal/SAM/##11, to ensure that vendors are not on the list of suspension and/or debarment. Evidence of the verification will be in the form of a search result screenshot signed, dated, scanned and kept on file. Program Directors also check the State of Georgia

suspended and debarred supplier list. The Walton County School District does not purchase any goods or services in any amount from any vendor or contracted person/company identified on this website as being suspended or debarred.

# Contracted Services

At various times, the district requires services that cannot be performed by regular staff personnel. The district must obtain these services by contracting with an individual for the performance of these services. Services will be adequately documented and necessary for the program. The cost of services must be reasonable. There are three (3) documents required for payment for contracted (non-employee) services to occur. First, an Internal Revenue Service W-9 Form (Request for Taxpayer Identification Number and Certification) must be completed and on file in the Accounts Payable Department. Second, an E-Verify affidavit, driver's license/state issued I.D., or a Georgia Professional License Number Certificate, as appropriate, is required by state law to verify work eligibility of public contracts. Third, there shall be a written contract between the district and the independent contractor. A copy of the contract must be attached to the blanket purchase requisition(s). The contract should provide the following information:

- The contractor's exact legal name (this should match the IRS Form W-9).
- The contractor's address.
- The contractor's social security number or Federal Tax Identification number (this should match the IRS Form W-9).
- The date(s) of service to be performed. This should always be a future date.
- The type of services to be performed (detailed description breakdown)
- The amount to be paid. If business expenses are to be included, they should also be specified.
- The contractor must sign and date the contract.
- The superintendent or designee must sign and date the contract.

Payments to contractors are made through the Accounts Payable Department on the weekly disbursement schedule just as any other vendor. Payments made to an independent contractor in the amount of $600 or more in any calendar year will be reported to the Internal Revenue Service on an Internal Revenue Service Form 1099-Misc. Contractors must invoice and no invoices are paid until after services are rendered.

# Equipment Management / Inventory

The Elementary and Secondary Education Assistance Act of 1965 (ESEA) reauthorized by the Every Student Succeeds Act of 2015 (ESSA) requires that Local Educational Agencies (LEAs) implement and maintain financial management systems that substantially

comply with federal systems management requirements. These requirements state that districts shall provide "effective control over and accountability for all funds, property, and other assets. Recipients shall adequately safeguard all assets and assure they are used solely for authorized purposes".

The purchase of any equipment using 21st Century funds must be pre-approved by the Program Director who will ensure that the equipment is necessary for the identified area of need and that it meets all requirements of the federal program for which it is being purchased. The Technology Request Form is submitted to GaDOE and must be approved prior to purchase.

Items purchased with federal funds are divided into the categories of real property, equipment, pilferable items and supplies. An inventory of tangible items having a useful life of more than one year will be maintained. This includes all items purchased under state object codes 615 (expendable equipment) and 616 (expendable computer equipment) as well as other items generally considered to be inventory and pilferable items and supplies. All Inventories will be maintained in the InTrack database and will include the following: description of property, serial number or other identification number, funding source, FAIN number, title holder, acquisition date, purchase price, percent allocated to the source, location of asset, condition of property, disposal date (if applicable), sale price of property (if applicable).

21st Century equipment orders and shipments are handled at the Central Office. The 21st Century Administrative Data Clerk orders and receives the item(s), removes shipping tickets and opens the containers to label and process the inventory utilizing InTrack before issuing the item(s) to the program site. The tickets are maintained at the Central Office. Site Coordinators sign-off on receipt of the items and the location of the items. Materials purchased for use will be labeled as such and will be utilized in the capacity for which they were purchased. Any equipment, materials and/or supplies purchased with federal funds are considered solely for the use of that program. Equipment shall be retained and continue to be listed in InTrack for as long as there is need for such equipment to accomplish the purpose of the program for which it was purchased. Safeguards are in place to prevent theft, loss, or damage.
21st Century Equipment is typically kept in the Site Coordinator's office or in the location designated as a safeguard location as pre-approved by the Fiscal Analyst through the 21st Century Community Learning Center Technology Request for Approval. A check-out system is implemented when applicable and necessary to ensure the equipment is used only during program hours.

Inventory of all equipment and property belonging to the 21st Century Program will be identified and physically checked at least once yearly. This physical check will verify the existence, location, current utilization, continued need, and condition of each item listed. Documentation of completed inventory checks will be kept on file in the federal program office. The Program Director or 21st Century Administrative Data Clerk will also randomly check equipment and may request an additional full physical inventory check at any time. Any discrepancies noted during physical inventory check must be

addressed. This may mean moving a piece of equipment to another location, updating the inventory list, or further investigating to determine the status of a piece of equipment.

Requests for maintenance or repair of federally funded equipment are made using the electronic technology work order process. In the case of equipment that is unable to be repaired, the Program Director determines whether the equipment should be disposed of. Once a piece of equipment that was purchased with federal funds is no longer needed for its originally intended purpose, it can be designated as surplus. Items that are no longer usable need to be disposed of. A disposition form must be completed for any item that is declared surplus because it has met its originally intended purpose or because it is no longer usable. The date of disposition must be entered into the InTrack database. Once a disposition form has been completed and the disposition date has been entered into InTrack, the item can be repurposed or disposed of.

When computer equipment is no longer operational, it will be recycled or disposed of. A Disposition Form must be completed and submitted and approved by the Program Director prior to the disposal of any computer equipment. Inventory records will be corrected and maintained in the InTrack database. The Technology Department assists with disposition of computer equipment following the above procedures.

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

1. Complete form
2. Submit form to Program Director
3. Make corrections to the inventory in the InTrack database

Records regarding equipment that has been disposed of shall be maintained by the school and/or district for at least five (5) years following the final disposition of the item. GaDOE provides flexibility regarding purchases of software, computers, and equipment that cross grant periods as follows:

- Purchases may extend beyond one year to take advantage of cost reductions if the students in the current fiscal year receive benefits from the purchase.
- If instructional software licenses are purchased after January, the district must provide an explanation within the budget description indicating how many students in the current fiscal year will benefit from the purchase.

In the event that funding is withdrawn or expired early for any reason, the district will utilize the process outlined in the 21st Century Operations Manual at GaDOE for equipment disposal. Equipment will be removed from a private school if the equipment is no longer needed for 21st Century services.

# Professional Learning

Formal and informal methods will be used to gather systematic feedback from all participants to guide staff development and training needs. **All staff**

must attend an **initial 21st Century Community Learning Center orientation** covering the following items:

1. 21st Century Community Learning Center goals and objectives
2. Review of Staff Handbook
3. Responsibilities and guidelines for 21st CCLC staff
4. Techniques for positive behavior management
5. Techniques for effective instruction
6. 21st Century Community Learning Center Policy and Procedures

A staff needs assessment will be conducted. A plan will be developed around this assessment. Regular staff meetings will be held. One of the purposes of meetings is to survey staff for development needs, evaluate needs, and organize needed professional development. Training for staff, partners, and parents will be organized by the Program Director and Site Coordinators. Program personnel will be encouraged to participate in school district professional development opportunities that are relevant to their needs. The district's Staff Development Coordinator will work closely with the Program Director to meet the needs of the staff. Program Director and/or Site Coordinators will attend state and regional 21st Century Community Learning Center meetings. The **Staff Professional Development Plan** will be developed and included in the Staff Handbook each year. Professional Development specific to 21st Century Community Learning Centers and effective after school programming will be implemented.

# Staff Evaluation and Actions

Documented Staff observations will be conducted at a minimum of once per year, with feedback/discussion opportunities about the observations between the site coordinator and/or program director and staff member(s). Site coordinators and instructional staff should always communicate regularly and informally in addition to the documented Observation. Management implements an "open door policy". A Formal Job Performance Evaluation will be conducted at mid-year (December or January) and at the end of the program. Locally developed forms will be utilized. The purpose of these Observations and Formal Evaluation is to strengthen the program continuously and run the program with fidelity and compliance at all times. Classroom staff, site coordinators, and auxiliary staff will be evaluated by the direct supervisor. If instructors are not performing satisfactorily, the site coordinator meets with the instructor to outline what needs to be improved and how to make those improvements. The instructor is reevaluated within 20 days. If the instructor has not improved, they are dismissed from the program. A record of classroom observations and evaluations and any performance documentation will be maintained in the supervisor's office. Please note that the after-school evaluations are separate from evaluations which may be conducted by day administration for day personnel.

# Cell Phones Usage – Staff and Student

Cell phones are to be turned off or placed in vibrate mode during the program. **Neither Staff nor Students are not to have cell phones out during instruction unless the phone**

**is being used for instruction purposes.** Staff members will not be called to the school telephone except in case of emergency. In cases less urgent, the office staff shall relay a message. Staff Emergency Contact information is kept on file in the Site Coordinator's office and in the front office.

Effective July 1, 2026 Georgia enacted the Distraction-Free Education Act (HB 340), which restricts cell phone use in public K-8 schools. The law mandates that students will be prohibited from using personal cell phones and other communication devices during the instructional day, with exceptions for students with Individualized Education Programs (IEPs) or medical plans. Staff are expected to model this behavior for students.

# Mandated Reporter

All 21st Century Community Learning Center employees are mandated reporters. If any complaints of rape, sexual assault, child sexual abuse, or other crimes are received, these complaints should be immediately forwarded to Student Services, who will contact the appropriate child protective agencies and/or law enforcement authorities. Failure to report suspected criminal acts as required by law by any employees could result in disciplinary action.

All employees are required to report known or suspected cases of child abuse, neglect, or dependency and, to the extent possible all acts alleged to have been committed by any adult against a child that would constitute abuse, neglect or dependency if they were perpetrated by a child's parent, guardian, custodian or caretaker. The report shall be made immediately at the time the employee becomes aware of or suspects that a child has been abused or neglected or is a dependent child. The employee shall make the report to the school counselor or to an administrator. If the school counselor and administrators are not in the building, the report shall be made to the 21st Century Community Learning Center Site Coordinator or to the Program Director. After the report is made verbally, the employee shall follow up the verbal report in writing. The Site Coordinator shall also report the information to the principal. Information regarding suspected cases of abuse, neglect, or dependency is confidential; therefore, employees must use discretion in discussing suspected cases with other employees. Such information should be discussed with other employees only when necessary to promote the best interests of the student. The employee must not discuss the information with non-21st Century Community Learning Center personnel except as required by law or authorized by the employee's immediate supervisor. DFCS is required to obtain more information from mandated reporters. Employees shall not conduct an investigation but shall gather enough information for DFCS to make a response determination. If an employee suspects immediate danger for the child or the child is afraid to go home, the employee shall inform the Site Coordinator or Program Director, who shall contact Student Services.

# Sexual Harassment

It is the policy of Walton County School District to provide an environment that is free from sexual harassment of any kind. This policy is taken very seriously and applies to all

members of the school system, including employees and students. Complaints should be reported immediately. Walton County Schools will not tolerate sexual harassment of its students or employees by non-school personnel in programs sponsored or supported by the system as well. Persons found to be in violation of this sexual harassment policy shall be subject to disciplinary action which may include for employees, but is not limited to, written warning, demotion, transfer, suspension or dismissal. Violations of student discipline can be found in the Code of Conduct. Complaints against non-school personnel shall be forwarded to the appropriate law enforcement agencies. **Legal Authority:** Sexual harassment is a form of sex discrimination which is prohibited by Title VII of the Civil Rights Act of 1964, and by Title IX of the Education Amendments of 1972. **Definition:** Sexual harassment includes, but is not necessarily limited to, conductor speech which entails unwelcome sexual advances, requests for sexual favors, taunts, threats, comments of a vulgar or demeaning nature, or demands which are intimidating or create a hostile environment for a student or employee, as well as physical contact. There may be other speech or conduct which employees or students experience as illegal harassment which should be reported also; harassment can take many forms and it is not possible to itemize every aspect of the harassment forbidden by this policy. **Non-Reprisal:** No faculty, administrator or staff, applicant for employment, student, or member of the public may be subjected to reprisal or retaliation for action taken in good faith to seek advice concerning a sexual harassment matter, to file a sexual harassment complaint, or to serve as a witness or as a panel member in the investigation of a sexual harassment complaint. Walton County Schools will take appropriate and immediate action to respond to any retaliatory conduct. **False Accusations:** A complainant whose allegations are found to be both false and brought with malicious intent will be subject to disciplinary action, which may include for Walton County Schools employees, but is not limited to, written warning, demotion, transfer, suspension, or dismissal, and for student appropriate forms of discipline as found in the Code of Conduct. **Responsibility:** Individuals who are aware of or have experienced an incident of sexual harassment should promptly report the matter to one of the officials designated to receive informal or formal complaints. An initial course of action for any person who feels that he or she is being sexually harassed is for that person to tell or otherwise inform the harasser that the conduct is unwelcome and must stop. However, in some circumstances this course of action may not be feasible, may be unsuccessful, or the individual may be uncomfortable dealing with the matter in this way. To encourage persons experiencing alleged sexual harassment to come forward, Walton County Schools provides open channels of communication and both informal and formal complaint resolution procedures. Most complaints are handled informally, however informal procedures are optional, and complainants can choose to bypass them, discontinue them, or initiate a formal complaint while using them. The purpose of dealing with a complaint informally is to stop the offending behavior and to resolve the matter as expeditiously as possible. Complainants are encouraged to put their complaints in writing, although this is not required for informal or formal complaints. Students should be strongly encouraged to report known or suspected sexual harassment which they have observed or heard about. Employees must report known or suspected sexual harassment. Failure to do so could result in disciplinary action from school administration and potential personal liability. **Information, Counseling, and Informal Resolution:** Anyone may seek advice,

information or counseling on matters related to sexual harassment without having to lodge a formal complaint. Persons who feel they are being harassed or are uncertain as to whether what they are experiencing is sexual harassment, are encouraged to talk with their principal or designee or department directors. Students may seek advice or information from the school counselors or social workers as well. At this stage of the informal resolution process, the person seeking information and advice will be counseled as to the options for action available under this policy. To the extent possible, information disclosed through this advising process will be held in confidence unless and until the initiating individual agrees that additional people must be informed in order to facilitate a solution. The aim of informal complaint resolution is not to determine whether there was intent to harass but to ensure that the alleged offending behavior ceases and that the matter is resolved promptly at the lowest possible level. In attempting to resolve a complaint informally, the principal or designee or department director receiving the harassment complaint may interview the alleged harasser, inform the alleged harasser of the complaint, question the alleged harasser about the alleged incidents, review Walton County Schools sexual harassment policy with the alleged harasser, and inform the alleged harasser that he or she must immediately stop any harassment that is ongoing or face swift disciplinary action. Written documentation will be kept of informal complaints as well as how the complaint was handled, but not in permanent files. This written documentation will be stored by the principal or director involved in the complaint.

# Formal Complaint Resolution

The filing of a written complaint is requested, although not required, for a matter to be formally investigated and a determination made as to whether this policy prohibiting sexual harassment has been violated. If the complaint is oral, the person receiving the complaint shall promptly prepare a written statement of the complaint and shall have the complainant read and sign the statement if it accurately reflects the complaint made. Complainants wishing to file a formal complaint are encouraged to file their complaints within 90 days following the alleged incident of sexual harassment with their principal or designee or department directors to enable school officials the opportunity to deal with the allegations promptly and equitably. Formal complaint resolution procedures include conducting a thorough investigation that results in a formal written report of the investigator's findings of facts, conclusions, and recommended action to resolve the complaint. In this type of procedure, not only are the parties of the complaint interviewed but witnesses and other third parties also are interviewed. The alleged harasser will be informed of the allegations, the identity of the complainant, and the facts surrounding the allegations. The alleged harasser will be given an opportunity to respond to the allegations and evidence provided by the complainant and/or alleged victim, and to provide a statement of the facts as perceived by the alleged harasser.

## *Formal complaints should be reported to the following persons*

1. Complaint involving a Student. All formal complaints of sexual harassment involving a student, whether the complainant or alleged harasser, should be given

to the appropriate principal or designee or department directors, preferably in writing, who will forward the allegations to the Title IX coordinator for Walton County Schools. Once the Title IX coordinator is aware of the allegations, he/she will immediately inform Student Services of the complaint, and the investigation will be conducted jointly.

2. Complaint involving an Employee. All formal complaints of sexual harassment involving an employee, whether the complainant or alleged harasser, should be given to the supervisor of the alleged harasser, preferably in writing, who will forward the allegations to the Title IX coordinator for Walton County Schools. The Title IX coordinator will coordinate a team to investigate the allegations. If for some reason the complainant is uncomfortable reporting the allegations to the principal or designee, department director or supervisor, the complainant may report their concerns directly to the Title IX coordinator.

## *Time Limits and Appeals*

1. The investigative team shall have fifteen (15) work days to complete the investigation and prepare a written report to the complainant detailing any action to be taken in response to the complaint and the time frame in which such action will be taken and copies of this report shall be furnished to the complainant, the appropriate principal or designee, and the department director.
2. If the complaint is not resolved at the conclusion of the fifteen (15) day period or if the complainant is not satisfied with the resolution of the complaint, the complainant shall have the right, within five (5) work days of receiving a copy of the written report, to have the complaint referred to the Superintendent of schools.
3. The Superintendent shall have fifteen (15) work days to review the complaint and report of the investigative team and attempt to resolve the complaint. The Superintendent shall furnish to the complainant a written response setting forth either his or her approval of the action recommended by the investigative team or the action to be taken by the system in response to the complaint in lieu of that recommended by the investigative team and the time frame in which such action shall be taken.
4. If the complainant is dissatisfied with the response by the Superintendent, then the complainant shall have the right, within fifteen (15) work days of the receipt of the written response of the Superintendent, to have the complaint referred to the Board of Education. In order to have the board review the Superintendent's decision, the complainant must file with the Superintendent a written statement setting forth the reasons he or she disagrees with the response of the Superintendent and the action the complainant is requesting the system take. The complainant shall also include in the written response a request that his or her complaint be referred to the Board of Education.
5. Within thirty (30) work days of receipt of the written request of the complainant, the Superintendent shall present the matter to the Board of Education at its regular meeting or at a special meeting called for that purpose. The Board shall review the original complaint, the report of the investigative team, the response of the Superintendent, and the response of the complainant. In addition, the

Board may, but is not required to, hear directly from any individuals with knowledge of any relevant facts relating to the complaint.

6. The Board of Education will either uphold the recommendation of the Superintendent or require the system to take some other action in response to the complaint. A copy of the action of the Board will be furnished to the complainant, either as a part of the minutes of the Board of Education or as a separate written statement. The Board shall be the final reviewing authority within the system.
7. This policy is not intended to deprive any employee of any right they may have to file a grievance pursuant to any other policy of the local Board of Education. This policy is not intended to provide an alternative process for resolving evaluation and employment disputes where there already exists a due process procedure mandated by state law or State Department of Education regulations, specifically including, but not limited to, hearings to be conducted pursuant to the Fair Dismissal Act of Georgia. The complainant retains at all times the right to contact the Office of Civil Rights and/or the Equal Employment Opportunity Commission with regard to any allegations that the system has violated the statues described above.
8. The school system shall be responsible for distributing and disseminating information relevant to this policy and procedure to students, applicants for employment and employees through appropriate procedures.
9. This policy will be provided to all employees every year through training implemented by the Human Resources Department.

# Partners and Advisory Council

21st Century Community Learning Center is partnered with co-applicant The Partnership for Families, Children & Youth Family Connections. The Partnership Advisory Board serves as the 21st Century Community Learning Center Advisory Board overarching with 21st Century Community Learning Center Site Team Subcommittees underneath. Numerous community partners provide resources to assist staff in serving students. Parent and student representatives from each site are also consulted in an advisory capacity.

# Sustainability Plan

Through the efforts of the co-applicant, The Partnership, and the Walton County School District (WCSD) data collection and evaluation efforts now more than ever have evidence that well thought out collaborative strategies make a difference in the families of Walton County and that afterschool programming is valuable to our students and families. See full WCSD 21st Century Community Learning Center Sustainability Plan. Also, the Partnership for Families, Children and Youth is a quasi-governmental collaborative that has been convening and coordinating efforts designed to improve the well-being of the families of Walton County since 1994.

The goal is to build partnerships among organizations that advance the quality of life for families and to communicate to the community the value and potential of the combined

services of the partners. Through this effort the Partnership hopes to achieve a continuum of services that address gaps in services and redirect efforts in a focused and responsive manner. Sustainability is established through system changes in service integration and delivery, partnership development, and support from partners and the community at large. In the present economic environment, the Partnership recognizes it will be hard to produce new funding, so the collaborative members' charge is to identify present resources and funds and to explore avenues of redirecting funds or modifying current job descriptions to better meet the needs of the community.

In extreme circumstances where the subgrantee does not feel that an effective and efficient continuum of services can be provided, the subgrantee may invoke the "Termination" procedures outlined in the *GaDOE 21st CCLC Subgrantee Manual*, which state:

**Reduction or Termination of Grant Award**

The reduction or termination of a subgrant award may be initiated by the subgrantee or Ga DOE.

1. The subgrantee may terminate the grant award at any time upon mutual agreement of GaDOE.

A subgrantee may initiate termination of its grant award by submitting written notification to the 21st CCLC program manager and to the Associate Superintendent of Federal Programs. The notification shall state the reason(s) for initiating the termination process and the effective date of the termination. The Associate Superintendent of Federal Programs shall recommend to the State Board of Education to accept the subgrantee's decision to terminate the grant.

# Matching funds / In-kind Services

On very rare occasions, donations are placed in a pupil activity fund within the site's school budget with a separate number than 21st Century fund number. The 21st Century Community Learning Centers receives no matching funds but tracks in-kind donations of goods and services through partners and volunteers. Volunteer time is tracked by the Site Coordinator and reported to the Program Director. The time is calculated by what would be paid to the same person if they were paid. Partners that teach classes appear on the schedule and calendars.

# Community Outreach

Grant award announcements and program information are made at the Walton County Partnership for Families, Children and Youth monthly meeting and WCSD Board meeting. The Walton County Community Partnership Collaborative (Family Connections) will list the 21st CCLC as a resource in their publications and on their website, and a monthly update will be given at the Partnership meetings where members are made aware of the program and asked to encourage families to participate. This meeting has parents, community stakeholders, approximately 70 community organizations and all 21st Century Community Learning Center partners

as participating members. The Program Director also reports results to the Advisory Council and school board. Newspaper articles keep the community informed about activities and successes. The Advisory Council will make recommendations, and the final report will be released to the stakeholders; school personnel, 21st Century Community Learning Center staff, parents and partners. Copies of reports will be made available to the public at each school office. The Program Director is responsible for ensuring information is disseminated. All attempts will be made to communicate with families in students' primary language. Students and parents and other stakeholders will be informed about program services through newsletters (in students' primary language), fliers, school marquees, special mailings, school's phone tree, district and school web pages and other communications from the Program Director, Site Coordinators, and school administrations.

# Participant Recruitment, Enrollment and Retention

The Site Coordinator promotes the 21st Century Community Learning Center program during the school's Open House Night as well as other school functions. Recruitment begins by sending invitations and applications home with targeted students. As applications are received, the 21st Century Community Learning Center Site Coordinator reviews student's records and works with the regular day staff to identify students for the afterschool program. Parents/Guardians are contacted via letters, emails, or phone calls regarding acceptance to the program and further details. Students may be placed on a waiting list. Site Coordinators also consult the school administration, day teachers, counselors, and special education teachers/directors to identify at risk, special education students and students receiving ELL or EIP services. Site Coordinators and day staff collaborate in order to provide appropriate accommodations for ELL, IEP and EIP students who participate in the program. 21st Century activities are offered and opened to private school students. To ensure that meaningful consultation with private school officials takes place, invitations to participate and consult with the 21st Century Program Director and staff take place prior to the program start and ongoing several times per year via receipt delivery. Each meeting is documented and has an agenda and sign-in. Private school officials submit an "Intent to Participate" form. Consultation is ongoing. No child is denied attendance based on race, color, religion, national origin, age, or disability. Regular and open communication between the Site Coordinator and parents/guardians takes place to help ensure retention and in order to optimize services for the students and families. The 21st Century Community Learning Center program will keep the program website updated to keep the community updated about the program. All materials can be made available in other languages when necessary.

# ELL

Walton County School District collaborates with Walton County Chamber of Commerce, Piedmont Migrant Agency, DFACS, Walton County Family Connections, and social

workers to monitor mobility, identification, and needs of the ELL population. As these students enter the school system the Home Language Survey is completed by the school to determine the language of students. All ELLs are assessed annually on the state-adopted English proficiency measure with their continued eligibility for language assistance determined through a Language Assessment Conference (LAC). 21st Century hosts ongoing activities for all parents, including parents of ELL students. Every effort is made to inform the parents of ELL students of ways they can assist their students academically. 21st Century follows the district's Translation and Interpretation Services Plan which guides staff in supporting parents in need of these services. Upon registration, the district asks parents to indicate their preferred language for receiving school information. To the extent practicable, communications are provided in the parent's preferred language. Resources available to translations and interpretation include Language Line, a phone based interpretation service with over 180 language options, a district-maintained list of approved interpreters (including sign language).

# Parent and Family Engagement

All 21st Century Community Learning Centers have on-going communication to parents. Each site will hold a minimum of the following family engagement events each year: Performing art and/or project showcase events tied to math and/or literacy (two during the school year and one during summer); Parent nights focusing on curriculum, homework help and other educational activities that assist families to become more engaged in their students' progress (four during the school year and one during the summer); student enrichment events that promote increasing family knowledge and approval of the program and create interaction between parents/caregivers, students, staff and the community (two during the school year and one during summer). These events occur during regular program hours and all staff are expected to participate. Additionally, parents are always encouraged to drop-in or volunteer during the program. The goal is to ensure that parents and families receive extraordinary services and experiences that will lead to improved academic achievement.

# Emergency

Each teacher shall have a copy of the 21st CCLC emergency plan for their site with a current class roll, class schedule, and student medical information list. Information shall be updated regularly and staff shall take the information with them anytime you leave their classroom. Each classroom must have a fire drill evacuation route map posted near the classroom door. At least 6 emergency drills shall be conducted during program hours each school year and include fire, weather, and lockdown. Procedures for drills are outlined in detail in Staff and Parent/Student Handbooks. Staff will communicate emergencies via classroom call buttons and/or walkie talkies. If warranted, 911 will be notified via phone. In extreme emergencies, site coordinators and other WCSD day school staff who work for the 21st CCLC program will employ their Centegix badges to summon emergency responders.

# Field Trips

Off-Site field trips will only be allowed during the summer program. However, on-site field trips may take place during the regular program. Pre-approval is required for field trip expenses. The Site Coordinator shall work with the Program Director on the approval process. Permission Slips with parent contact numbers are to be collected. Prior to leaving campus for a field trip, cell phone numbers are to be shared between the field trip staff/chaperones, the Site Coordinator, an administrator and the Program Director.

Staff shall follow the procedures below if ANY field trip emergency arises.

1. Call the Police or an Ambulance;
2. Call the School or if it is after school hours, contact an administrator and Program Director immediately;
3. Call parent(s) - Refer to permission slip for contact numbers;
4. Stay with the child at all times. One teacher should be designated to accompany the student to a hospital if necessary;
5. The teacher should stay until a parent arrives;
6. If returning to school with the student, a teacher should escort the student to the parent with a brief and factual explanation of the occurrence;
7. Any hostile parents should be directed to a Site Coordinator or Program Director;
8. Documentation of the incident should be made with the school administrator

# Internet Guidelines for Use

The Walton County Public School System takes no responsibility for any information or materials that are transferred through the Internet. Because of the size of the Internet, many kinds of materials eventually find their way onto the system. Should a user happen to find materials which may be deemed inappropriate while using his or her Walton County Public School System Internet account, he or she shall refrain from downloading this material and shall not identify or share the location of this material. Be aware that the transfer of certain kinds of materials is illegal and punishable by fine or jail sentence. The primary purpose of the Internet connection is educational. It is essential that everyone who uses this connection understand that purpose. Anyone using the Internet connection for non-educational purposes shall immediately log off should any significant system slow-down occur. Failure to abide by these regulations shall result in suspension of their Internet account, pending administrative review. The Walton County Public School System makes no guarantees, implied or otherwise, regarding the reliability of the data connection. The Walton County Public School System shall not be liable for any loss or corruption of data resulting while using the Internet connection. The Walton County Public School System reserves the right to examine all data stored in the machines involved in the Internet link to make sure that all users are in compliance with these regulations. No user shall use this Internet link to perform any act that may be construed as illegal or unethical, including the use of the link to gain unauthorized access to other systems on the network. The Walton County Public School System administration reserves the right to change these rules at any time without

notice. The Walton County Public School System strongly condemns the illegal distribution of software, otherwise known as pirating. Any students or employees caught transferring such files through the Internet, and any whose accounts are found to contain such illegal files, shall immediately have their accounts permanently revoked. In addition, all users should be aware that software piracy is a federal offense and is punishable by fine or imprisonment.

# Information and Communication

The Program Director attends all Federal, State, Local and 21st Century grant meetings. The Program Director is responsible for keeping the Superintendent and Curriculum and Instruction Department informed about goals, services and overall student progress and evaluation of the program. Principals receive information from the Program Director at called meetings and at principal meetings. Informally emails are sent from the Program Director to all Site Coordinators and Principals to relay information about services, monitoring and compliance. The Program Director and Site Coordinators communicate regularly about 21st Century Community Learning Center issues and information via email, visits and meetings. Attendance at these meetings is maintained by the Program Director.

Information about the goals, services, policies and procedures, student progress and evaluation of the program plus location, times and dates of operation will be disseminated to students and parents in a number of ways accounting for language and literacy barriers. The Site Coordinator sets up a booth at the school open house prior to school opening and at parent activities after school opens. Program information such as schedule and previous year evaluation summary is dispersed, applications are available for prospective students and registration is provided for returning students. The schools, district and community will receive information about progress, successes and evaluation. 21st Community Learning Center information (including the Operations Handbook, Staff Handbook, Student/Parent Handbook, Sustainability Plan, and Program Evaluation Reports) are posted on the WCSD website.

All 21st Century Community Learning Center Site Coordinators have access to Infinite Campus where specific information about student's attendance, grades, Multi-Tiered System of Supports (MTSS) status, Special Education (IEP) and Educational Intervention (EIP) status are recorded. Students are marked as a participant in 21st Century Community Learning Center so the regular teacher can see a child's participation. This allows for communication between the day school staff and the Site Coordinator if there are specific academic or behavior issues. The external evaluator conducts formal and informal surveys and seeks stakeholder input. She/he then provides a summary of the information within 2 weeks. He/she provides a formative and summative evaluation report to the Program Director. These reports are submitted to the GaDOE 21st Century Department. The Program Director and Site Coordinators utilize all data collected through the above described means to make ongoing necessary revisions and/or adjustments to the program for student success. After school staff communicate regularly with day instructional staff, school administrators, parents – regarding grades,

goals & objectives, student success or challenges, schedules, special events, and other program related information. All communication, no matter the form, is made available if necessary to ELL students and parents in their preferred language.

# Confidentiality

Staff will not disclose, publish or disseminate any information in any form (electronic, printed, verbal, written, etc.) that is obtained under the provisions of the Family Educational Rights and Privacy Act (FERPA) and Georgia State Statutes or developed for WCSD related to the personal information of the participants at the Community Learning Center. Staff will not use, publish or disseminate any information or work product available for personal use, nor will provide it to a third party for their use. Staff further agrees to take all reasonable precautions to prevent any unauthorized use, disclosure, publication or dissemination of any materials as stated above. In addition, failure to comply with this policy shall result in suspension or termination from employment and/or access to any and all 21st Century Community Learning Center activities in the future. All staff are trained annually on FERPA law. All staff sign a confidentiality agreement upon hiring.

# Transportation Plan

WCSD transportation policies are followed by the 21st Century Community Learning Center program. Bus issues follow the same protocol as day school. Only the Superintendent, Program Director, or Transportation Director can approve cancellation or changes of transportation. WCSD buses may be used for the transportation of students and district personnel to and from school related activities. Buses shall not travel on private roads or driveways. Buses are approved to transport students in afterschool programs and activities. All students participating in activity trips or other school-sponsored excursions must be transported in Walton County Public Schools school buses, or, if approved by the Superintendent or his/her designee, other appropriate modes of transportation, such as common public carriers or chartered buses. The district will provide homeless students, students with disabilities, and students with limited English proficiency services that are comparable to services offered to other students in the school, including transportation services. All vehicles used and drivers employed for transportation purposes shall conform to the specifications, standards, requirements, and qualifications established by the State Board of Education and regulations of the Walton County Board of Education. Students shall receive instruction annually in safe riding procedures. Bus drivers shall read bus safety rules monthly to reinforce the safety of students being transported. In situations where school buses or charter buses are not provided, the parent/guardian shall be responsible for providing transportation. Site Coordinators are responsible for submitting student transportation lists one week before transportation is provided.

# Civil Rights

The Walton County Board of Education and 21st Century Community Learning Center does not discriminate on the basis of race, color, religion, national origin, age, disability, gender or in its employment practices, student programs and dealings with the public. It is the policy of the Walton County Board of Education to comply fully with the requirements of Title VI, Title IX, Section 504 of the Rehabilitation Act of 1973, the Americans With Disabilities Act (ADA), IDEA and all accompanying regulations. The Walton County Board of Education will not tolerate discrimination or harassment on the basis of race, color, religion, national origin, age, disability, gender or by any employee or student. This policy also applies to non-employee volunteers who work subject to the control of school authorities.

# Mandatory Disclosures (2 CFR 200.113)

If any employee becomes aware of any violation of federal criminal law involving fraud, bribery, or gratuity violations, he/she must disclose such in writing in a timely manner.

# Reporting Fraud, Waste, Abuse & Noncompliance

21st Century Community Learning Centers provide a confidential means for reporting suspected wrongdoing involving fraud, waste & abuse of and school assets or resources. Reportable activities may include, but are not limited to:
Neglect of duty - Noncompliance with applicable rules, laws and regulations; misuse or abuse of time during work hours.
Misuse of Property - Negligence in the care and handling of property, unauthorized or inappropriate use of property or equipment, intentional abuse or destruction of property, theft of property, or of another employee's property.
Falsification of Information - Falsification of personnel records, time records, or any other employee record or report.

## *How to report Fraud, Waste, Abuse & Noncompliance Complaints*

If unsure how to proceed with a concern, contact Robin Bryant, Director of Finance during normal business hours at (770) 266-4439 for guidance prior to completing the Fraud, Waste, Abuse & Noncompliance Reporting Form.

- **In person or writing:** The Finance Department is located in the Walton County Board Office at 200 Double Springs Church Road, Monroe, GA 30656
- **By phone:** (770) 266-4439
- **Online:** Complete and submit the Fraud, Waste, Abuse & Noncompliance Reporting Form

We define abuse, fraud and waste as:

- "Abuse" means the excessive or improper use of something, or the employment of something in a manner contrary to the natural or legal rules for its use; the intentional destruction, diversion, manipulation, misapplication, maltreatment, or

misuse of resources owned or operated by the locality; or extravagant or excessive use so as to abuse one's position or authority.

- "Fraud" means the intentional deception perpetrated by an individual or individuals, or an organization or organizations, either internal or external to local government that could result in a tangible or intangible benefit to themselves, others, or the locality or could cause detriment to others or the locality. Fraud includes a false representation of a matter of fact, whether by words or by conduct, by false or misleading statements, or by concealment of that which should have been disclosed, which deceives and is intended to deceive.
- "Waste" means the intentional or unintentional, thoughtless or careless expenditure, consumption, mismanagement, use, or squandering of resources owned or operated by the locality to the detriment or potential detriment of the locality. Waste also includes incurring unnecessary costs because of inefficient or ineffective practices, systems, or controls.
- "Noncompliance" means not following guidelines set forth by local, state and federal regulations and grant requirements.

# Complaint Procedures Regarding the 21st Century Community Learning Center program

Please try to resolve complaints for WCSD 21st Century Community Learning Center with WCSD 21st Century Community Learning Center or the school district before moving forward on a formal complaint. For complaints about 21st Century Community Learning Center please call Jimmy Pitzer at (770-207-3173) 200 Double Springs Church Road, Monroe, GA 30656 for county resolution or for a copy of the complaint form. To initiate a formal complaint, a person must submit the 21st Century Community Learning Center Complaint Form to the Walton County School District. This complaint form may be obtained by contacting Jimmy Pitzer (see contact information above).