## **Appling County School System**



# FEDERAL AND INTERNAL OPERATING PROCEDURES MANUAL

2022-2023

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**REVISED November 2022** 

#### **INTRODUCTION**

The purpose of this handbook is to provide a systematic approach to managing the guidelines, policies, and procedures of all Federal Programs including Coronavirus Aid, Relief & Economic Security (CARES) Act ESSER I, "CARES Act", Coronavirus Response & Relief Supplemental Appropriations (CRRSA) Act ESSER II "CRRSA Act", and American Rescue Plan Act (ARP) ESSER III, "ARP Act", Title I, Part A; SIG 1000 (a), Title I, Part C; Title I, Part D; Title II, Part A; Title III, Part A; Title IV, Part A, Title V Part B REAP; Title IX, Part A, McKinney Vento Act, & IDEA. The information in this handbook will promote uniformity in operations and assist faculty and staff with compliance with all federal programs. Policies and procedures are reviewed throughout the year with appropriate staff and developed in conjunction with CFO to ensure uniformity. This handbook is subject to change at any time. Any questions not addressed in the handbook should be directed to an assigned Appling County School System Federal Program Director.

THIS ENTIRE DOCUMENT DESCRIBES THE REQUIREMENTS FOR ALL FEDERAL PROGRAMS, CARES ACT, CRRSA ACT, and ARP ACT IN THE APPLING COUNTY SCHOOL SYSTEM (ACSS)

ALL SCHOOLS INCLUDES ALL TITLE I SCHOOLS AND GEORGIA BAPTIST CHILDREN'S HOME AND FAMILY MINISTRIES (GBCH) AN N&D FACILITY.

PRINCIPALS INCLUDES ASSISTANT PRINCIPALS AND DIRECTORS OF GBCH.

PERSONNEL INCLUDES TEACHERS AND SUPPORT STAFF.

The information included in the Federal and Internal Procedures Manual may be subject to change. The most up to date information is available in the Q-Drive under Title I.

### TABLE OF CONTENTS

CTION 1 Overall Requirements
Overall Requirements
Cycle of Monitoring and Timeline overview for all Federal Programs
Operating and Monitoring Procedures
Monitoring of Private Schools
Cycle of Monitoring and Technical Assistance to Schools
Communication with Principals/Schools
Collection of Documents Required from Schools
Corrective Actions
Title I General Procedures
Monitoring of Title I Schools
Monitoring of N&D Facility
ESSER Overview
Corrective Actions for Identified Schools
Principals Involvement in Procedures
Technical Assistance
School Improvement Plans Involvement
Schools Individualized Data Analysis
Equipment Inventory
Equipment uses for Private Schools
CTION 2 Comprehensive LEA Improvement Plan (CLIP)
CTION 3 Budgets
Cost Principles
Unallowable Expenses
Supplement not Supplant
Reasonable and Necessary
Allowability of Costs
Allowable Cost
Restricted Indirect Cost
CTION 4 Requisition Process
CTION 5 Family-School Partnership Program

	District and School Parent & Family Engagement Policy School-Parent Compact Annual Title I Meeting Building Capacity for Involvement Notices to Parent of English Learners Parent Notifications Staff Capacity Parent/Guardian Capacity Parent Resources Parent Advisors Communication/Correspondence in Another Language Parents Right to Know/Professional Qualification Letters to Parents Regarding PQ Status
6. <u>SE</u>	CTION 6 Reservation of Funds. 54  Professional Development  Parent and family engagement  Homeless Children and Youth  Neglected and Delinquent Children  Private Schools
7. <u>SE</u>	CTION 7 Allocation/Carryover
8. <u>SE</u>	CTION 8 Attendance Area Determination
9. <u>SE</u>	CTION 9 Maintenance of Effort & Equity
10.	SECTION 10 Poverty Counts & Rank Order
11.	SECTION 11 Academic Achievement Awards
12.	SECTION 12 School Improvement
13.	SECTION 13 Schoolwide Plan Programs
14.	SECTION 14 Comprehensive Support and Improvement
15.	SECTION 15 Public School Choice
16. 17.	SECTION 16 Records Retention 71 SECTION 17 Comparability 72

18.	SECTION 18 Fiscal Requirement for Federal Programs
19.	SECTION 19 Equipment and Real Property
•	Use of Equipment Disposition of Assets Monitoring of Equipment Inventory
20.	SECTION 20 Reporting
21.	SECTION 21 Services for Homeless Children & Youth
22.	SECTION 22 Services for Foster Care Children

23.	SECTION 23 Services for N&D/Prevention & Intervention Programs121
24.	SECTION 24 Pre-K Programs
25.	SECTION 25 Private Schools
26.	SECTION 26 Title I, Part C
27.	SECTION 27 Title II, Part A, Teacher Quality
28.	SECTION 28 Title III, Part A & ESOL  Overview  Implementation and monitoring of EL Entrance Procedures Identification of English Learners Screening for Eligibility EL Eligibility Criteria Maintenance of Student Records – EL Eligibility Screening for Eligibility – Students identified or suspected disabilities Screening irregularities Testing Security EL Exit Procedures ACSS EL Exit Criteria Maintenance of Student Records – EL Exit Accommodations Post-Exit EL-Focus Professional Development Parent and Family Engagement Outreach Activities Comprehensive Needs Assessment – CLIP

•	Budgeting Equipment and Inventory Program Evaluation	
29.	SECTION 29 Title IV, Part A.	158
30.	SECTION 30 Title V, Part B.	159
31.	SECTION 31 Charter Schools/Special Charter/Commissioned Schools1	60
32.	SECTION 32 Audits.	160
33.	SECTION 33 Complaint Procedures.	161
34.	SECTION 34 Ethics, Fraud, Waster & Abuse	166
35.	SECTION 35 Assessment Security.  District/State Report Card	167
36.	SECTION 36 IDEA	176

#### **APPENDIX**

Appendix A: Title I Paraprofessional Non-Regulatory Guidance

Appendix B: FY23 ACSS Assessment Plan

Appendix C: General Guidelines for Federal Equipment & Inventory

#### **SECTION I: OVERALL REQUIREMENTS**

Appling County Schools has implemented a process for monitoring all federal programs. All schools in the district including Georgia Baptist Children's Home and Family Ministries, an N&D Facility, are included and are part of the procedures included in this manual.

Federal Program Directors/Coordinators are responsible for the implementation and monitoring of their respective grants. The Special Education Director is responsible for all IDEA and ESSER CARES IDEA grants. The Assistant Superintendent is responsible for Title V, Part B and CARES Act (Coronavirus Aid, Relief & Economic Security (CARES) Act, CRRSA-Act (Coronavirus Response & Relief Supplemental Appropriations (CRRSA) Act), and ARP Act (American Rescue Plan (ARP) Act. The CFO is responsible for LEA Bonuses and School Nurse Grants. The Federal Programs Director is responsible for Title I, Part A, Title I, Part C, Title II, Part A, Title III, Part A, Title IV, Part A, Title IX, Part A, RTF, ESSER II-CRRSA ACT-SA-RESERVES, ESSER III-ARP Homeless Children and Youth I & II. Federal Program Directors/Coordinators conduct periodic school visits and provide ongoing technical assistance via school visits, emails, telephone calls, copies of quarterly budget logs, and informal meetings in an effort to provide monitoring and support with federal program requirements. The school visits (virtual when necessary) are used to provide one-on-one support to schools, in addition to ensuring a comprehensive understanding of federal program guidelines and procedures. These visits (virtual when necessary) are also used to ensure proper use of all resources provided by federal funds in an attempt to increase academic achievement, implementation of all Federal Programs and provide any technical assistance that is required, requested, or needed at each individual school site.

Technical Assistance agendas/checklists are used during visits to provide a record of the support provided and to document any problems or areas that need to be addressed. Documentation of visits, zoom meetings, monitoring and technical assistance provided is maintained in the district office by each Federal Program Director/Coordinator responsible for each program. Revised 3.7.2022

Additionally, the Federal Programs Director, School Improvement Coordinator and SPED Director, reviews the comprehensive needs assessment (data) of the schools as part of the SIP reviewing process. All expenditures that are approved, are aligned to the CLIP and to each individual program requirements—Title I, Part C (Implementation Plans), Title III, Part A (EL Program Information Plan) and School Improvement Plans. On-going communication, meetings and work sessions scheduled throughout the school year enable school administrators to be directly involved for quality program implementation and compliance. Monitoring of SIP effectiveness is reflected on the SLDS Progress Monitoring documentation. Any corrective actions are directly addressed to the Principal at each school before SIPs are approved and funds are released to the schools. All documentation on any corrective action requested by the LEA is documented via emails, face to face TA, or by recommendations on SIP document. Revised 12.8.2021

District Testing Coordinator reviews school data with Principals and Superintendent to identify high risk schools within the district. Data review takes place throughout the school year, during leadership meetings, school visits, conference calls and zoom meetings. The data reviewed is consistent with state data and district benchmark data. State testing data along with local benchmark data is disaggregated, shared, discussed, to ensures the ACSS is proactive in the identification of High-Risk schools. Schools that may have low growth scores are contacted to review goals and implementation plans to address any issues. The school improvement plan is continually reviewed as a living document to address the current needs of student population. In addition, School plans, needs assessment data, program budgets, travel requests and all purchase requests are reviewed by Program Directors through the year to ensure that all expenses are aligned and are allowable before approving any expenses. During this review process any schools that require/need additional technical assistance, Professional Development, or Data Analysis is rapidly addressed. Revised 12.8.2021

## CYCLE OF MONITORING AND TIMELINE OVERVIEW FOR ALL FEDERAL PROGRAMS FOR THE SCHOOL YEAR FY22 & FY23

#### June - July

- Comprehensive APPLING Improvement Plan (CLIP) Stakeholder Meetings
- Revisions of School's C.N.A., SIP, Parent & Family Engagement Policies
- Revise and approve SIP for budget approval
- All departments submit final revisions of CLIP
- Submit ID&R Plan, Foster Care Plan and Migrant Implementation Plans
- Submit FY23 CLIP
- Title III, Part A Program Information Plan
- Participate in Federal Programs Conference GaDOE
- Intradistrict Transfer Notifications
- Occupational & Residency Questionnaires
- Review Comparability for FY23
- Continuous review of APPLING school plans (SWP) and budgets, including parental involvement plans for amendments
- Parent Notifications in multiple ways that school is a Title I School
- Submission of the Coordinating Early Intervention (CEIS) Plan and Budget if determined to be disproportionate in any area per federal/state guidelines. (IDEA)
- Submission of CEIS data to GaDOE (IDEA)
- Submission of Preschool Exit Data from prior year (IDEA)
- Submission of Postsecondary Outcomes (IDEA)
- Child Find/Early Childhood Transition Timeline Data (IDEA)
- Parent's Right to Know Notifications
- Collection of Periodic Certifications for Summer School Personnel
- Implement, Manage and Evaluate Summer School Programs
- Balance Federal Programs Expenditure Reports & Complete Drawdowns
- EL, Migrant and Homeless Student Status Changes on Infinite Campus
- Summer School Implementation Plan Evaluations

- Regular Year Implementation Plans
- Exited EL status changes in SIS

#### **Workshops & Technical Assistance:**

- Budgets
- Ordering
- Compliance Issues
- Parent and Family Engagement
- School wide/Targeted Assistance
- Monitoring
- School Improvement
- McKinney-Vento
- Inventory
- Child Find
- Professional Qualifications
- Timelines for year
- Technical assistance request

#### **August**

- Submit names of Title I Paid Employees (ISS/Paraprofessionals)
- Submit Paraprofessional Daily Schedules for review/approval
- Review Title I Certified Staff schedules
- Annual Title I Meeting Window Begins
- Complete and Follow up on all Occupational & Residency Questionnaires
- Child Find/Early Childhood Transition Timeline Data Prong 1 if applicable (IDEA)
- Continuation of Services Data if applicable (IDEA)
- Implementation of SIP
- Technical assistance to all principals on all Federal Programs
- Review SIP's and school allocations with all Principals and GBCH
- Submit Budgets
- Conduct 1<sup>st</sup> PAC Meeting
- Conduct Parent Meeting for Parents of ELs
- El Reclassification Team Meetings

#### September

- Review Time and Effort sheets
- Submit Title I, Part C Budget
- Regional Title I Workshops
- Collect Title III Teachers Schedules
- Balance/Close Fed. Prog. Expenditure Reports & Complete Drawdowns
- Close out of all federal budgets

#### October

Title I, Part A & IDEA; budgets due in Consolidated Application Oct. 1

- Purchase Orders for this school year will be due 10/7/2022
- Review Class Schedules-Split-Funded Personnel
- Review Time and Effort sheets
- EL and Immigrant students are coded correctly before October FTE Count
- Submit Annual Title I Meeting documents (after school meeting)
- Deadline for Annual Title I Meeting (Oct. 31)
- Distribution of School-Parent Compacts & Policy Plans
- School Parent Compact Due with checklist
- Submit School-Parent Compact Assurance Form
- Distribution of Parental Involvement Plans/Post on School's Website
- Submit Parental Involvement Plan Distribution Assurance Form
- Deadline to notify parents of the location of the Title I Schoolwide Plan
- Deadline for LEAs to send notification to private schools serving students of the availability of Title I and IDEA consultation for FY23
- MOE Reconciliation Deadline (IDEA)
- Budget Completion Reports Deadline (IDEA)
- Proportionate Share Calculation Deadline (IDEA)

#### **November**

- Review Time and Effort sheets
- Purchase orders due first Friday of November 10/7/2022.
- Prepare files for self-monitoring and cross-functional monitoring
- Technical assistance to all Title I schools
- Collect data to determine eligible attendance areas for next school year
- Child Find/Early Childhood Transition Timeline Data Prong 2 if applicable (IDEA)
- Transition Planning Opens for Data Entry (IDEA)

#### December

- Review Time and Effort sheets Technical assistance of all Title I schools
- Budget Amendments
- Complete Annual Survey of Local Institutions for N&D
- Submit Comparability
- Deadline for ACSS to demonstrate comparability without penalty
- Transition Planning Survey and Self-Assessment Submission Deadline (IDEA)
- Conduct 2<sup>nd</sup> PAC Meeting

#### January

- Review Time and Effort sheets
- Periodic Certification for all Personnel Fully Funded (100%) by Title I.
- Collect Inventory Reports
- Georgia Family Engagement Conference
- Develop, administer, and compile results for FY23 CNA

- Balance Federal Programs Expenditure Reports & Complete Drawdowns
- High Cost Grant and Residential and Reintegration Services Application available if applicable (IDEA)
- Parent Survey opens (IDEA)
- Transition Survey Prong 1 Deadline if applicable (IDEA)
- Excess Cost Calculation Submission Deadline (IDEA)

#### **February**

- Review Time and Effort sheets
- Technical support visits/meetings
- GCEL Conference
- WIDA ACCESS for ELLs/Alternate ACCESS

#### March

- Review Time and Effort sheets
- Stakeholder survey opens for Title I
- High Cost Grant and Residential and Reintegration Services Application Deadline March 1 if applicable (IDEA)
- Transition Survey Prong 2 Submission if applicable (IDEA)

#### April

- Review Time and Effort sheets
- Summary of Federal Programs stakeholders survey due
- Begin review/revisions of Title I Parental Involvement, Title I Schoolwide Plans, and School-Parent Compacts
- Balance Federal Programs Expenditure Reports & Complete Drawdowns

#### May

- Review Time and Effort sheets
- Spring Title I Input meeting Deadline for Spring Title I Input meeting documents (revision of School-Parent Compacts for FY23, revision of Parent engagement Plans, FY23 1% of Parent engagement Budget input
- Submit End of the Year PE Evaluation
- Develop, administer, and compile results of ACSS CNA
- Submit Education of Homeless Children and Youth (EHCY) Reports
- Deadline for completion of Parent Surveys (IDEA)
- Postsecondary Outcomes opens for data entry (IDEA)
- EL Reclassification Team Meetings
- Conduct 3<sup>rd</sup> PAC Meeting
- Review ACCESS for ELLs Score Results
- Exit EL
- EL Reclassification Team Meetings

#### **Ongoing Throughout School Year and Program Specific Timelines**

#### **Pre-planning:**

School Administrators and Program Directors re-deliver federal program information to their school staff, community and parents at meetings and professional development training sessions.

Leadership teams at each school, led by the school Principal, and ISS, review benchmarks, state assessment results, and other significant student data to determine specific targets of improvement that need to be included into their School Improvement Plans. The teams, with the system Parent and Family Engagement Coordinator and parents, also examine their schools Parent and Family Engagement Policy and Parent-Teacher Compacts, or any updates before presenting to all parents and community.

School Council meetings are scheduled, and agenda items may include presentations by program directors on the CLIP, System Implementation Plan, School Improvement Plans, budgets, School-Parent Compacts, and Parent and Family Engagement Policies, and federal programs information.

All Federal Program Directors provide technical assistance by reviewing the updated School Improvement Plan. Needed revisions are then sent to each school's Principal. The Federal Programs Director and other appropriate Program Directors arrange meetings with any Neglected and Delinquent institution within Appling County to discuss academic needs, budgets, special services, curriculum, and Parent and Family Engagement.

#### September- May:

Collaborative grade-level teams review benchmark assessments in core content areas and collaboratively plan lessons targeted to improve identified student weaknesses.

Program Directors provide updated Title I and other federal programs' information to administrators at leadership staff meetings and provide staff development as needed.

The Principals and school staff provide updated Title I, and other federal programs' information to each school's School Council members at regular meetings.

The Program Directors, Principals, and staff meet as necessary to monitor Federal Program requirements, along with another federal programs' information.

#### **Parent and Family Engagement Timeline of Events**

(Revised 9-19-2022)

#### August/September

- Technical assistance to all Title I School Parent Engagement Coordinators
- Open House at all schools.
- Meet/Greet Teacher events at all Title I schools.
- Middle School and High School Orientation is provided for 8th graders in the system at the Fine Arts Building at the High School for parents of students in 8th grade going to 9th grade during the current year.
- Parent Advisory/School Council Meetings ongoing all year
- Building Staff Capacity #1

#### October/November:

- Technical Assistance to all Title I School Parent Engagement Coordinators
- Parent Advisory/School Council Meetings ongoing all year
- Annual Title I Meetings are conducted at all schools prior to November 1st
- Distribution of Title III/ESOL Notifications
- Distribution of District Policy, School Policy and Compact in 2 or more ways
- Building Parent Capacity #1

#### **December/January**

- Technical assistance to all Title I School Parent Engagement Coordinators
- Building Staff Capacity #2
- Building Parent Capacity #2
- Parent Advisory/School Council Meetings ongoing all year
- Collection of evidence of distribution of School-Parent Compacts, district and school policies and building capacity for parents and school personnel.

#### February/March

- Technical assistance to all Title I School Parent Engagement Coordinators
- Building Capacity Staff & Parent #3
- Parent Advisory/School Council Meetings ongoing all year
- Collection of Input from parents, community, stakeholders, and school personnel on compacts, district and school plans, capacity and parent engagement funding, 1% plus 1% of PFE's carryover funds.

#### April/May

- Technical assistance to all Title I School Parent Engagement Coordinators
- Building Capacity Staff & Parent #4
- Collection of Input for School Improvement Plans, School-Parent Compacts, Parental Involvement plans, six steps in building parent capacity, Annual Title I Survey Results
- Revision of District & School Policies and School Compacts

#### May

- Technical assistance to all Title I School Parent Engagement Coordinators
- Implementation of Transition plans
- Annual Stakeholder's meeting on Parent & Family Engagement Requirements (approval of District & School Policies and School Compacts)

## APPLING COUNTY SCHOOL SYSTEM OPERATING & MONITORING PROCEDURES

Appling County School System monitors the implementation of all federal and the expenditure of all funds associated with each program. In this process, ACSS systematically provided technical assistance and collected data in order to provide information that can guide program implementation and monitoring all critical ESSA requirements: Revised 5/6/2021

#### In the Monitoring Process, Federal Program Directors/Coordinators will:

- Undergo training from GaDOE and other sources to maintain proficiency in program compliance requirements.
- Provide technical assistance to local schools throughout the school year based on GaDOE and district timelines and compliance requirements.
  - Conduct self-monitoring as needed and requested by GaDOE, when the district is not being monitored on an on-site basis, ACSS will complete as requested by GaDOE a self-assessment and submit it to GaDOE.
- Maintain all documentation needed based on the Monitoring Instrument issued annually by GaDOE.
- Observe, record, and collect information that are critical to the monitoring process in order to provide feedback to schools that can assist in improving student academic achievement, ensure that all federal programs activities are carried out in accordance to federal compliance guidelines, equipment is being used for the purpose of the funded program, inventory, attainment of academic goals, monitoring policies, and compliance with budgetary guidelines.

All schools are subjected to on-going monitoring by the Directors of Federal Programs throughout the school year. Feedback is provided to the principals via follow up technical assistance. In addition, emails, staff meetings, and phone conversations take place throughout the year as a means of providing on-going monitoring and communication with all schools. Agendas, sing-in sheets, and minutes include any issues observed during the technical assistance that will require additional technical assistance.

#### **Monitoring of Private Schools**

The ACSS and Private school share levels of responsibility for monitoring purposes. Private Schools:

Private school officials are responsible for

- engaging in consultation with LEA officials to discuss implementation successes and challenges
- adjusting/amending their priorities throughout the year based on their students' needs,

 ensuring appropriate use of equipment and supplies at the private school, and • evaluating services received from the LEA

#### ACSS:

• Monitor the implementation of federal programs to ensure compliance with program requirements.

#### Monitoring EL Entrance/Exit Process and Title III, Part A

The Federal Programs Director collaborates throughout the school year with all ESOL Teachers in the county to ensure that any communication from the GaDOE is passed on to the teachers. At the beginning of the school year, a meeting is held to review all the processes that will be implemented, updated and planned throughout the school year. All forms that will be housed in the Q-drive and/or infinite campus are reviewed and approved. This process allows for the Federal Programs Director to personally be involved in the everyday activities that are held at each school, the implementation of procedures is consistent across the district, monitor the identification, services and exit criteria of ELs, monitor supplemental language instruction, professional learning, and parent and family community outreach programs. Teachers submit schedules to ensure that all ELs are being served and to ensure that sufficient staff is available in all schools. During face to face technical visits, school principals are given an overview of Title III, Part A, ESOL, Title VI of the Civil Rights Act of 1964, and ESOL to ensure that students are provided with the required and supplemental services, EL Entrance/Exit Process are followed consistently and effectively, and that ESOL teachers are given the same resources as any other teachers in the school district. The CLIP is used as the main means to secure supplemental services to ELs and outreach opportunities to their parents. Supplemental Language Instruction is monitored by scores on pre and post benchmark data. Professional Development is evaluated by feedback surveys. walkthroughs and/or observation checklist. EL Parent/family, community outreach is evaluated by annual surveys provided in Spanish and English. See Section 28: Title III, Part A and ESOL.

ESEA/ESSA requires GaDOE to monitor the implementation of program requirements and the expenditure of federal funds. Georgia's monitoring process consists of four major components:

1. Monitoring of Expenditures – Based on the results of the Comprehensive Needs Assessment and approved CLIP, ACSS annually submits budgets on all Federal Programs that receives funding through the Consolidated Application process. Federal Program Specialists review each application and budget and approves the budget. Superintendent reviews the budgets and approves it. GaDOE releases funds on the portal. Once budgets are approved, Federal Program Specialists track how well ACSS is requesting funds for expenditures to ensure that ACSS will meet the expenditure requirements for federal funds. Federal Program Directors set deadlines for schools to use school allocations or available funds in order to address the needs of students and staff within the period of grant performance.

- 2. Single Audit In the event that ACSS has an audit finding; technical assistance will be provided to ACSS to resolve the audit.
- 3. On-site Monitoring GaDOE on-site Cross-Functional Monitoring Team visits ACSS to apply the criteria included in the ACSS Monitoring Form.
- 4. Self-Monitoring Checklist If requested, ACSS completes the Self-Assessment Checklist and submit it to the Georgia Department of Education (GaDOE).

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

- ACSS is monitored on a four-year cycle.
- ACSS's audit or monitoring findings requires a return of monies, or receiving a high number of complaints from parents and other stakeholders are monitored within a year.

#### **CYCLE OF MONITORING & TECHNICAL ASSISTANCE TO SCHOOLS:**

All school benefitting from federal funds are monitored each year to ensure that improvement plans are well written and executed and that items budgeted are directly related to items contained in school improvement plans and CNA. During the fall and after the GaDOE Technical Assistance in the summer or webinars provided all year round, the Federal Programs Directors convene meetings of all principals during a leadership meetings or on-site meetings. School personnel for each of the Schools are also invited and encouraged to attend the meetings. Principals receive training on procedures and guidance on all components of federal programs guidelines and individual requirements.

Principals are given detailed information of expectations and copies of program guidance. Specific training is provided in all facets of Title programs. The ACSS Federal Programs Procedures Manual is online and discussed during TA meetings with Principals. This handbook includes timelines, budget forms, inventory information, schoolwide/targeted assistance implementation, Intradistrict notifications, parental and family engagement, testing security, and other areas of Federal Programs. The summer/fall meetings also include discussions on the chart of accounts, the budgeting process, and the correlation of the budget and Title I Schoolwide Plan. Schools submit budgets and required documentation to the Directors of Federal Programs for review and approval. The budgets are maintained by the directors electronically and ultimately entered into the GaDOE Consolidated Application for approval. The budgets are referenced when invoices, timesheets, requisitions, and professional learning forms are submitted to the Directors of Federal Funds for approval.

Formal and informal meetings as well as phone calls and emails provide technical assistance and monitoring feedback is provided to Principals including GBCH and other Federal Program Directors throughout the year. A Timeline of all the federal programs is distributed at the Principal's meeting that outlines the federal required documents with the necessary due dates. Email invitations often serve as calendar reminders for item due dates. If/When schools need to correct or resubmit an item, either a meeting is held, a

phone call is made, or an email is sent describing the issue and how to correct it. All formal meetings are documented via agenda, sign-in sheets, and minutes.

In addition to meeting with principals, district staff also meets with, Schools Parent and Family Engagement Coordinators at the beginning of each year. These meetings are an opportunity to discuss Title I in detail and also an opportunity to discuss content specific information with each of the above. Schools Parent and Family Engagement Coordinators and ACSS Parent and Family Engagement Coordinator meet throughout the year. A separate Parent Coordinator's meeting is scheduled prior to the beginning of the school to discuss the parental involvement aspects of the Title I Program. Principals are also provide with an overview of Parent engagement requirements.

#### COMMUNICATION WITH PRINCIPALS/SCHOOLS

Communications with principals, their office managers, parent engagement coordinators, and other school personnel occur through large/small group meetings, program/administrative meetings, formal and informal individual meetings, email, or by phone. Communication is two-way, and schools call if they have questions or concerns about budgets, procedures, or any other requirements of Federal Programs and vice versa.

#### **COLLECTION OF DOCUMENTS REQUIRED FROM SCHOOLS**

Federal Program Directors communicate with principals and school personnel on specific documents that are required by each federal program. Collection of documents are set by each individual program. In general, samples and original forms are provided to the central office on documentation that is required by each program. Staff is asked to maintain a copy in their files noting the date each is submitted to the central office. The documents are submitted to the Directors and are placed in a central folder. Meetings are held with principals at the beginning of the year where the components of the programs and the required documentation are discussed to ensure principals have a full understanding of the federal programs, use of funds, funds available, and documentation required by each program. Follow-up meetings, phone calls, and emails support the acquisition of required documents.

#### **CORRECTIVE ACTION**

If Corrective Action Plan is required from previous monitoring findings, the ACSS/Program Director will respond in a timely manner with a Corrective Action Plan which must be approved by GaDOE. Implementation of the Corrective Action Plan will be monitored by the appropriate Title Program Education Program Specialist. These action plans will be addressed in the federal manual for all federal programs involved to address in the future. Corrective action from previous monitoring is discussed with principals in order to assist them in understanding the critical need for compliance in Federal Programs. Professional learning is provided based on the needs but, in addition, professional learning is used as a preventive measure to ensure that all staff has a clear understanding of all expectations of every facet of federal programs. The Federal Programs Directors, along with district level staff, and outside consultants, as needed will provide on-going training as a means of ensuring that all staff are complying at all times. Anticipatory training is conducted

throughout the year that ties in directly with all facets of Federal Program compliance. All correspondences related to Federal Programs are maintained at the central office. Technical Assistance is maintained either as an archived email or in a monitoring file to include an agenda and sign-in sheet documenting the assistance.

#### Title I

Specific sections to Title I are described below, with general procedures being addressed at the previous sections.

Title I is a federally funded program which provides services to schools based on student economic needs. Title I is the largest Federal Assistance Program for our nation's schools. The goal is to provide a high-quality education for every child, so the program provides extra help to students who need it most. These students are the furthest from meeting the core academic standards the state has set for all children. Title I is supplemental and is intended to serve students in all Title I Schools including GBCH.

#### **MONITORING**

Monitoring all aspect of Title, I, are followed and described at the beginning of this manual. In addition, at the beginning of the school year, requirements are discussed with Principals. This face-face individual meetings allows for the principals to have the opportunity to ask questions, provide feedback, or gain more information about the requirements. Schools submit copies of any required documentation to the Title I office for monitoring purposes. The files are monitored throughout the year. The schools are also asked to maintain copies of documents. Formal and informal meetings (on-site and system) as well as phone calls and emails provide technical assistance and monitoring feedback. Emails often serve as calendar reminders for item due dates. If/When schools need to correct or resubmit an item, either a meeting is held, a phone call is made, or an Email is sent describing the issue and how to correct it. Monthly payroll and budget status reports are reviewed and principals are contacted immediately to resolve variances. Title I personnel are required to monitor any degree upgrades so that budgets will reflect the additional expense.

#### **Monitoring of Neglected & Delinquent Facility**

There is one facility for neglected students in Appling County School District: GBCH which is a residential facility. GBCH is monitored on the same timeline as other schools in Appling County. GBCH is subject to all monitoring regulations of Title I, Part A and is provided with the same technical assistance, monitoring process, timelines, schedules, data review and corrective actions as any other schools that receives funding and is subject to federal guidelines.

#### **Elementary & Secondary School Emergency Relief (ESSER) Funds**

In response to the economic outcome of the COVID-19 pandemic in the United States, Congress passed three bills that provided immediate and direct financial assistance to state and local educational agencies through the Elementary and Secondary School Emergency Relief funds. These funds were provided to support areas with the greatest

need, where the academic and non-academic components of school districts had the most significant impact due to COVID-19. As additional funding was provided, the funds were intended to support state and local school districts' efforts to safely reopen schools, address significant gaps in learning, and support measures of implementation that will continue to reduce the effects of COVID-19 on students and families.

- Section 18003 of Division B of the CARES Act-Coronavirus Aid, Relief & Economic Security (CARES) Act
  - Equitable Services: An LEA that receives ESSER funds under the CARES Act (section 18005) must provide equitable services to non-public school students and teachers in the same manner as provided under section 1117 of Title I, Part A of the ESEA.
- Section 313 of the Coronavirus Response & Relief Supplemental Appropriations (CRRSA) Act
- Section 2001 of the ARP Act-American Rescue Plan (ARP) Act- Section 2001
  - The LEA must reserve at least 20 percent of funds to address learning loss by implementing evidence-based interventions and ensure that those interventions respond to students' social, emotional, and academic needs and address the disproportionate impact of COVID-19 on underrepresented student subgroups.
  - Remaining LEA funds may be used for a wide range of activities to address needs arising from the coronavirus pandemic, including any activity authorized by the ESEA, the Individuals with Disabilities Education Act (IDEA), Adult Education and Family Literacy Act (AEFLA), or Carl D. Perkins Career and Technical Education Act of 2006 (Perkins CTE).
  - Maintenance of Equity: The ARP contains LEA maintenance of equity requirements for FYs 2022 and 2023.

#### **LEA Safe Return to In-Person Instruction Plan**

 An LEA that receives ARP ESSER funds must publicly make a plan for the safe return to in-person instruction and continuity of services on its website. Before making the plan publicly available, the LEA must seek public comment on the plan.

Technical Assistance agendas/minutes of meetings are used to provide a record of the stakeholders input and to document any problems or areas that need to be addressed. Documentation of survey results, BOE minutes, school agendas, parent involvement meetings are shared with Program Director/Coordinator responsible for each program. We also submit a 6-month review for the grant program.

Purchases made by Appling County School System will follow the rules and guidelines of the Appling County Board of Education, Georgia Auditing Guidelines and CFR 200.322 Domestic preferences for procurements: As appropriate and to the extent consistent with law, the ACSS should, to the greatest extent practicable under a Federal award, provide a preference for the purchase, acquisition, or use of goods, products, or materials produced in the United States including but not limited to iron, aluminum, steel, cement, and other manufactured products.

Effective FY23 - Requisitions will be completed using the YOSS Platform Flow System:

- 1. Requisitions will be completed by the staff member requesting the purchase.
- 2. Requisitions will be submitted to the building principal for approval.
- 3. Building Principal submits the requisition to the Program Administrative Assistant at the Central Office.
- 4. Program Administrative Assistant checks fund balance (function, object, etc.) and codes requisition.
- 5. Program Administrative Assistant submits requisition to Program Director for approval.
- 6. Program Director checks fund balance (SIP, allowability, prices, and vendor/procurement verification) and submits to Accounts Payable
- 7. Accounts Payable submits requisition to the Superintendent for approval.
- 8. Once Approved by the Superintendent, Accounts Payable enters the information into the computer to generate a purchase order.
- 9. The YOSS System emails the purchase order to the Program Administrative Assistant to process the order by fax/Email to the vendor. Revised August 2022.

**Check Request will follow this process:** Only if Purchase Orders are not accepted or emergency situations.

- 1. The check request form is submitted to Accounts payable to secure Superintendent's signature and approval.
- 2. If approved, check and tax-exempt form is provided to the requestor.
- Check and receipt/invoice and required/supporting documentation for each individual federal program is uploaded in the YOSS Platform as a Non-PO Invoice and then follows the YOSS approval process like any other requisition.

#### The following procedures are implemented upon receipt of the materials:

- 1. The Program Administrative Assistant/designated staff member/Director inventories the shipment by checking off, on the packing slip, items received.
- 2. The Packing slips are attached to the PO and stored in the central office.
- 3. The Invoice is uploaded in the YOSS Platform where the Administrative Assistant verifies the code then sends it to the Program Director for approval.
- 4. The Program Director approves the Invoice and submits it to Accounts Payable.
- 5. The Accounts Payable then processes the payment for the purchased item.
- 6. The Administrative Assistant/Director adds the purchase order number to program budget logs.

#### **CORRECTIVE ACTION**

Currently Appling County School System has not been contacted as having a school identified as in needs improvement. In the event that a corrective action was required of a school due to ACSS monitoring visit, then the following corrective action steps would be required:

Review and evaluate SIP

Review and amend if necessary the school's allocation/budget

Review personnel – personnel/student ratio

Document all action steps

#### PRINCIPAL INVOLVEMENT IN PROCEDURES

Principals are involved in all aspects of the federal programs. They are invited to meetings, provided guidelines and expectations and are requested to provide feedback on those, as well as, due dates and other general procedures. Principals are directly responsible for the presentation, review, and revision of their school's procedures as related to the school improvement plan, parent and family engagement plan and activities, and the school-parent compact. Samples of required information is provided to principals (i.e., Parent's Right to Know Notifications, 20 Day Notification, Intradistrict Notifications, PIRC, other information); however, it is their choice to accept and utilize the information in the format provided or to revise the format to suit their school's needs. Unless otherwise noted in the correspondence by the Federal Program providing the information.

#### **TECHNICAL ASSISTANCE**

Technical assistance is provided throughout the school year or as often as needed based on individual school needs. The Federal Programs Director is responsible for providing direct support with the overall allocation and procurement of the Title I, Part A funds. During these trainings, participants receive an overview of the Title I, Part A program, information on program guidelines, audit preparation, monitoring procedures and copies of all budget forms and documents used to support the use of Title I, Part A funds. Monitoring visits are designed to provide one-on-one support to schools in addition to ensuring a comprehensive understanding of federal program guidelines and procedures. These visits are targeted based on areas of concern identified by the GaDOE/Title I or requests made by individual schools. These visits assist the district office with maintaining compliance and ensuring that funds are properly used to support student achievement. Monitoring visits include, but are not limited to, assisting schools with budget allocations and balance reviews, procurement of funds utilizing district procedures, alignment of fiscal resources with school improvement plans, program assessments, review of equipment inventories, and monitoring of Parent and Family Engagement activities and initiatives. Technical Assistance Documentation Log and the monitoring checklists are used during each visit to provide a record of the support provided and to document any problems or areas that need to be addressed. Documentation of each visit is maintained in the district office.

There is an open door/phone/email type policy with the Directors of Federal Programs. Informal technical assistance to principals, assistant principals, bookkeepers, and any other Title I personnel are made during:

- Summer/fall administrative meeting with Title I schools administration for Title I and with all schools administration for all other federal programs
- District and School Annual Title I Meetings
- Formal meetings held by the central office (Title I, Administrative, Principals, Parents)
- Formal meetings held by the school
- Informal meetings and conversations held before, during or after other administrative/principal, and other meetings held by the central office
- Informal meetings and conversations held before, during or after meetings held at Title I schools
- Parent engagement meetings/workshops/activities
- Emails and phone calls to and from school personnel
- Title I Timeline
- Checklists
- Samples of required documents
- Face-to-Face Consultations with N&D Administrator

#### FEEDBACK ON SCHOOL IMPROVEMENT PLANS

School Improvement Plans Meetings are held with individual school personnel throughout the school year. Title I documentation is discussed and the checklist is applied to ensure compliance at the school level. Utilization of STAR, Illuminate, and/or Beacon provides ongoing data analysis throughout the year, which provides schools with vital information to determine if goals are being met. SIPs are analyzed to include all the necessary information in order to implement a successful plan.

Schools are given a deadline to submit SIP to the school improvement specialist. The SIP is then reviewed by other federal program directors and finally approved by Federal Programs Director/Tile I.

Unapproved SIP's are sent back to the schools. Schools make changes based on recommendation and resubmits the SIP which goes back to SIS and then to the Federal Programs Director/Title I. If major changes are requested from central office, schools must have a formalized meeting to present changes and have those changes approved by staff, parents and/or stakeholders.

Technical assistance is provided to the schools throughout the SIP process. In the event of a major change to the SIP, schools will be required to provide evidence that additional meetings were held and agendas, sign-in sheets and minutes will be required to ensure compliance. Approved SIP's are used to generate Title I, Part A budget.

#### **DATA REVIEW**

#### **School Individualized Data Analysis:**

Data analysis occurs throughout Title I schools and GBCH. Frequent collaboration in schools occurs across grade levels, content areas, and other system divisions to analyze data and determine areas of strength and those that require improvement. Staff members implement a formal process system-wide that promotes productive discussion about student learning and the conditions that support student learning. Further, each school has a leadership team made up of teacher/support personnel representatives that meet regularly. This group discusses the needs of the school and the various grade levels/departments within the schools. Members of the leadership team gather information and data from their group that collectively represents their grade level or department. This information is then shared with all staff members to obtain additional input and incorporate shared analysis and decision making throughout the school. This practice allows teachers to participate in the decision-making process for their school.

The school system holds regular leadership meetings that include school level administration, district program directors, and the superintendent. These meetings focus on a variety of system issues with ongoing improvement being a priority. This process allows all participants to share updates and accomplishments as well as discuss any issues that may have arisen within the district. Ideas, suggestions, and brainstorming comes from these sessions to address any weaknesses identified as well as celebrate successes.

Throughout the district, the Plan, Do, Check, Act Cycle is used as the basis for continuous improvement review from the classroom level up to the central office. Administrators and staff review all process and events using this model. All Title I schools have professional learning rooms that are used during the data analysis process. Principals are required to discuss this information with all staff to ensure that they fully understand the data presented. Principals are required to demonstrate to the Federal Programs Directors that they fully understand the needs of their school by identifying the root cause of the problems that keep the school from achieving academically. This information is discussed in detail in the updated schoolwide plans each year. This data process ensures a proactive process to identify possible high-risk schools.

#### **Equipment Inventory**

All schools are required to maintain an active inventory of all items purchased with federal funds. The Federal Programs Directors sign-off on all inventory once per year for all items inventories and purchased with Federal Funds that are turned in by schools, GBCH and district office. Each school has a staff person who is responsible for the physical inventory checklist. The documentation is kept at the BOE office. A detailed report on inventory is contained later in this document.

#### **Equipment Use for Participating Private Schools**

ACSS Inventory procedures will be followed at Private Schools. Inventoried items purchased for private schools will continue to be under the ownership of ACSS. At the present FY23 school year, ACSS does not have any private schools participating.

#### **Equipment Use for Title I, Part A Targeted Assistance Program**

There are not programs in the district that operate targeted assistance programs. In the event that a targeted assistance program was operating in the system, equipment would be available and used by identified students.

## SECTION 2: COMPREHENSIVE NEEDS ASSESMENT AND COMPREHENSIVE/CONTINOUS APPLING IMPROVEMENT PLAN (CLIP)

Annual Input, Development and Revision of the Comprehensive APPLING Improvement Plan, Parent and Family Engagement plans and activities, Schoolwide PLANS, and District and School Improvement Plans

#### **COMPREHENSIVE NEEDS ASSESSMENT**

#### **Appling County Instructional Improvement System-Work Flow**

- 1. Objective or perception data are obtained from various sources at the District and School level, including state assessments, local benchmark scores, universal screening data, surveys, demographic data (attendance, discipline, and enrollment), staff performance data, Governor's Office of Student Achievement and from the State Longitudinal Data System. Other information may be obtained as needed from sources as available (computer-aided instruction, Online Assessment System, etc.).
- 2. At the Central Office level, data is gathered and analyzed and is discussed at Leadership Meetings with the Superintendent and District Leadership Team. Information is shared with ISS who use data in the schools. The primary role of the ISS is system and school improvement with a focus on the improvement of instruction, increasing student performance, increasing stakeholder engagement, organizational effectiveness, and a climate of continuous improvement.
- 3. As data becomes available, it is disaggregated and given to the principal and instructional coordinators who, along with Assistant Principals, Instructional Support Specialists, and other staff, use the data in various sub-groups. These teams also acquire school-level data from benchmark assessments, universal screenings, common assessments, and discipline/attendance data. Most teams encompass the School Improvement Process as a whole, but also have sub-committees that do the work of breaking down data at a more detailed level. These sub-committees, Grade-level and Academic Teams, analyze classroom and individual student-level data which assist in planning and implementation of recommended improvements. Membership in these teams flows upward so that each subcommittee is represented. This way, recommendations and concerns are easily communicated to the team and administration.

- 4. Some schools have data rooms which are populated with information helpful in the decision-making process such as fully disaggregated test data, computeraided performance summaries and in some cases individual targeted student data (for remediation or enhancement purposes). School-wide teams typically meet in this environment to facilitate data discussions. If the room contains individual student data a greater level of security is maintained.
- 5. All teachers and administrators in the system have access at varying clearance levels to the Georgia State Longitudinal Data System and utilize it frequently to look at individual, classroom, school-level, and system-level data to include the new Student Growth Percentiles, graduation information, longitudinal test information, attendance trends, state standards. Teachers also have access to the GOFAR, Illuminate, or STAR (benchmarks and common assessments), and the computer-aided instructional intervention programs in which their students enrolled. They are required to use this data in planning instruction, interventions, and determining curriculum gaps for their students. This access is monitored at the school and district levels to ensure effective utilization and data security.
- 6. As the schools continually update their grades/scores, the data is often posted to their websites for increased stakeholder involvement and transparency. This data is also brought back to the System Leadership Team. Weaknesses are addressed at a school level and support is provided from the system level.
- 7. Professional Learning is provided to teachers, paraprofessionals, and administrators based on three primary sources. Surveys are conducted on a yearly basis to determine issues with climate and needs. In addition, trends and systemic needs are identified through the teacher evaluation process and data analysis. Individual needs for professional learning are identified through the TKES process based on self-assessment and GPSC goal or plan set by the staff member. In addition, as new initiatives are rolled out, professional learning is provided for programs such as Accelerated Reading, the State Longitudinal Data System, Book Worms, I-Read, System 44, ILEARN Math, Wilson Reading, Fundations, GOIEP, Thinking Maps, data disaggregation and analysis, differentiation of instruction, Georgia Standards of Excellence (GSE), etc. The effectiveness of Professional Learning is monitored through evaluations, walkthroughs, and data analysis. Principals and central office staff are responsible for this process.

The Comprehensive Needs Assessment for a continuous improvement is an ongoing process in which information is gathered throughout the school year and collectively

organized to develop all components required in the Comprehensive/continuous ACSS Improvement Plan (CLIP), Parent and family engagement Plans, Schoolwide Plans and District and School Improvement Plan (DIP), and Migrant Implementation Plans.

The CLIP drives the action/implementation planning for the upcoming school year. It is developed by the collection of school's CNAs, stakeholder input, student achievement data from state and national assessments, survey data, and self-assessments. All schools, annually, complete a comprehensive needs assessment process. All schools follow the same process as the central office and collect student data, survey results, stakeholder input, and self-assessment information. (Revised 12/9/2021)

#### Creating, reviewing and approving the CLIP:

- The ACSS CLIP is developed by the collection of the school's CNA and SIP information. All schools have meetings throughout the year with parents, stakeholders, staff, and parent councils to present, collect, and review information specific to each school. ACSS conducts meetings during leadership meetings with principals to collect and disseminate information that may impact the current and future CLIPs. ACSS and schools have parents, stakeholders, and staff complete surveys that addresses all the components included in the CLIP and Schools' CNA/SIP. The results of the surveys, along with student achievement data, climate surveys, self-assessment surveys, and stakeholder input are all incorporated to the CLIP and are presented at the District-wide CLIP Meeting.
- The District-wide CLIP meeting is announced in the newspaper, district and school website for at least two weeks in advance. In the newspaper the invitation is placed for two weeks. Invitations, flyers, and/or website announcements are sent to all parents and guardians to participate in the district or school's meetings. Meetings are held to accommodate varying schedules of parents and stakeholders. This same process applies to all federal programs.
- The District-wide CLIP Meeting allows for the District and schools to bring their key stakeholders, personnel and present their results. In this meeting, the ACSS brings in other stakeholders to learn about each school, ask to review any components and provide additional feedback on the CLIP. Once feedback or recommendations are presented and added to the CLIP.
- A 2<sup>nd</sup> meeting is scheduled to present the final CLIP for stakeholders to approve. All Federal Program Directors, Coordinators, and Principals aid in the completion process of the schools CNA/SIP and District's CLIP.
- The Federal Programs Director submits the CLIP to the Superintendent for signoff.
- The CLIP is a living document that can be changed at any time when additional circumstances or data is of vital importance. Amendments requested to the GaDOE provide justifications for making changes to the CLIP. Schools' plans are also continually changed and when major changes take place, these are presented to stakeholders for approval. The CLIP and SIPs are all available on the district website and the school's website for stakeholders to review and provide comments.

- Resolution for Unapproved Plans In the event that GaDOE requests revisions to the CLIP, Equity Plan, District and school Improvement Plans, ID&R Plan, Parent & Family Engagement Plan and/or Foster Care Transportation Plan, Federal Programs Director will retrieve the requested changes, collaborate with the necessary departments and resubmit the unapproved plan. This process is continued until each plan has been approved by GaDOE. ACSS has never had a CLIP turned in to GaDOE past the due date.
- Documentation of agenda, invitations, sign-in sheets, and minutes related to CLIP meetings presentation and approval are kept at the central office.

#### **CLIP Schedule/Timeline**

To ensure timely submittal to the GaDOE, the following timeline must be followed:

- August-July The CLIP is made available on the district website.
- February-April The current CLIP is made shared at meetings for stakeholder input. Surveys and input are collected.
- May-June A systemwide meetings are held for input and approval.
- July The CLIP is uploaded for GaDOE approval.

#### **Evidenced-Based Practices and Interventions**

**Definition:** The term "evidence-based", when used with respect to a state, local educational agency, or school activity, means an activity, strategy, or intervention that

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

Implications: During the annual School Improvement Planning Workshop held each June/July, school leadership teams will identify and record the extent to which the activities. strategies, interventions and/or contained in their school improvement/schoolwide plans meet the various levels of qualifying as being evidence based: strong, moderate, promising, or otherwise provide a rationale for improving student outcomes. In addition, goals and objectives are determined to address areas of needed improvement. Through the data analysis process at both the system and school level, staff members engage in productive discussion about student learning and conditions that support learning. Data is gathered and examined that represents the

particular area, district or school, as well as specific subgroups. During this analysis, team members identify strengths and areas of needed improvement. Discussions are incorporated to identify specific areas of concern by grade level, content area, course, and/or school. This information is then used to begin discussions on specific strategies to address areas of identified need. Strategies that have been used with success are shared and discussed. System and school leaders work together to examine and identify evidence-based strategies to address areas of need in order to achieve defined goals and objectives. Information on evidence-based strategies is gathered through a variety of methods including online research, periodical information, communication from other schools and districts that have used the methods, the Georgia Department of Education, education specialists, education consultants, and vendors. The evidence-based information is attached to every single purchase order. The evidence-based information is also reviewed by the District School Improvement Coordinator and finally by the Federal Programs Director before the purchase of any program. System and school leaders formally and consistently monitor the implementation of strategies and instructional practices through supervision and evaluation procedures beyond classroom observation to ensure that strategies and initiatives are implemented with fidelity.

#### **SECTION 3: BUDGETS**

For all federal programs, expenditures are monitored to ensure the following: conference costs are appropriate, allowable, and managed to minimize costs to the federal award. ACSS travel reimbursement procedures are followed ensuring that charges are reasonable and consistent, purchased memberships are in compliance with governing laws and regulations, purchased supplies are reasonable and necessary for the performance of grant activities, ACSS procedures for granting stipends consistently with federal and nonfederal funds are followed, expenditures are supplemental in nature, obligations occur within the period of performance, contractors perform in accordance with terms, conditions and specifications of contracts or purchase orders, adheres to the ACSS standard of conduct regarding conflict of interest, all expenditures are approved by the Federal Program Director/Coordinator, equipment purchases are reasonable in cost, charged at actual price, and are all allowable under their specific federal program guidelines.

As appropriate and after a meeting held with the Assistant Superintendent and CFO to discuss budgeting and other program requirements, Directors prepare budgets for Title I, Part A, other Title Programs, and/or Reward Schools Awards based on the allocation. Set asides for the system are determined first, based on needs/requirements. At the system level, school staff salaries and benefits for Title paid staff are calculated based on payroll forms obtained from the CFO. The calculations are determined using an Excel sheet with columns for salaries and all benefits. The totals for each school are then entered on a School Allocation Form that also includes appropriate function and object codes to which allowable expenditures are coded. School Title I budgets are developed based on SIP goals and recommendations from Principals. Principals are notified of the budget approval process. The principal meets with the School Leadership Team to examine needs which have been identified through data analysis and examination/evaluation of the School Improvement Plan (Title I). Set aside funds for homeless students, parent and family engagement, N&D, administration and professional development are allocated at the system level. Schools are given a date to complete and submit the budget which is reflected on the SIP, usually one month following receipt of the budget information. Schools are provided guidance through meetings, phone calls, and emails. The structure for completing the budgeting process is presented throughout with principals, and leadership teams. The schools submit their SIP for preliminary budget calculations. All items and personnel are then reviewed for allowable costs, which are reasonable and necessary to carry out the Title I, Part A, schoolwide program and other Federal Programs. Once necessary revisions have been made at the school level and reflected on the SIPs, the budgets are compiled and placed in the consolidated application. Purchase orders from schools are not approved or processed until budget(s) has been approved at the state level. Once approval of the application has been made, schools are notified to spend Title I and other Federal Funds as budgeted, provided a due date to complete purchases, and reminded to maintain a school log of requisition information -Excel spread sheets identical to system forms are available, or schools may develop their own. Requisitions are then processed following the purchasing procedures described in

Section I. Schools are encouraged to submit Title I purchase orders within three weeks of being notified that the funds are available.

IDEA budgets are created by first determining the staff that will be paid with these funds. Salary sheets are provided by the CFO and the SPED Director creates a spreadsheet with the salary and benefit amounts. These spreadsheets are utilized for amounts to be budgeted. Funds are then set aside for Indirect Cost as directed through conversation with the CFO. Remaining funds are then allocated for contract services such as but not limited to Speech, Related Service Providers, and School Psychology. In addition, remaining funds are budgeted for any supplies, software, technology, or equipment that may be needed to educate students with disabilities. SPED staff are allocated supply monies for instructional purposes as well. SPED staff complete the Purchase Order/Requisition process through the current online program utilized by the ACSS. See page 34 for additional information on this process. Rev. 11.8.22

Quarterly budget status reports are provided to Directors and Administrative Assistants from the CFO as requested. These are cross-checked with purchase orders and log forms of expenditures, and accuracy is verified. The balance status for object code areas is reviewed, and schools are notified if necessary. IDEA budgets are reviewed semi-annually.

Appling County uses the reimbursement payment method for Drawdowns. Periodically, Appling County requests drawdown of the funds that have been expended according to the approved budget. The general ledger is reviewed quarterly to make sure of the accuracy of request funds. IDEA budgets are reviewed semi-annually.

#### Reasonable and Necessary

To be allowable under Federal awards the expenditure must be <u>reasonable</u>, <u>necessary and allocable</u>. Schools must provide a rationale for why they are requesting the proposed expenditures, how it aligns with the comprehensive needs and how it is reasonable, necessary and allocable. The cost must be allocable to federal award if the goods and/or services involved can be charged or assigned to that federal award based on the grant's guidelines: 200.405

Use of funds must be articulated in the SWP and aligned with the needs of the eligible students. The plan drives the budget; therefore, all expenditures used in the implementation of the schoolwide program must be approved and directly related to the support of strategies included within the required comprehensive needs assessment for schoolwide programs.

Requisitions may be rejected if:

- Equipment or supplies are purchased when the district is responsible for providing the equipment or supplies
- The district or state has mandated an initiative and Title I funds are used to implement the initiative
- An allowable expenditure is used in an unallowable manner

#### The following factors affect allowability of Costs: §200.420-200.475

All cost must be:

- 1. Necessary, Reasonable and Allocable
- 2. Conform with federal law & grant terms
- 3. Consistent with state and local policies
- 4. Consistent with any conflict of interest
- 5. Cost take place during the period of the approved budget
- 6. Consistently treated concerning identification as a direct or indirect cost
- 7. In Accordance with GAAP
- 8. (Period of Performance (27 months) Not included as match/cost sharing requirement of any other grant program. Adequately documented. Cost must be incurred during the approved budget period. GaDOE at its discretion can authorized to waive prior written approvals to carry forward unobligated balances to subsequent budget periods pursuant to 200.08(e)(3)
- Practical aspects of reasonable
  - o Is it reasonable?
  - o Do I have the capacity to use what I am purchasing?
  - o Did I pay a fair rate?
- \*Director must be comfortable to defend a purchase and present a rationale.
  - Practical aspects of necessary
    - o Is it allowable?
    - o Is it really needed?
    - Is this the minimum amount needed to meet my needs-based on the plan?

#### Allowable Costs §200.403

Cost must be incurred during the approved budget period. GaDOE may waive prior written approval to carry forward unobligated balances to subsequent budget periods.

Revised 12.13.2021

#### **Unallowable Expenses**

All Federal Programs provide funds to improve achievement of the lowest-achieving students – those who are failing, or most at-risk of failing, to meet State academic content standards enrolled in high poverty schools. All activities supported with Title I, Part A and Federal Programs funding must support that intent. All Federal Programs are supplemental in nature and are used to provide for the unique needs of students with disabilities. IDEA also has unallowable expenses. Appendix F is attached to provide guidance in this area.

#### Restricted Indirect Costs (2 CFR §200.414)

GaDOE calculates restricted indirect-cost rates for ACSS each fiscal year based on requirements established by the U.S. Department of Education. Restricted indirect-cost rates are posted on GaDOE's Website and are sent to ACSS. The restricted indirect cost rates are found on GaDOE's Website. ACSSs may only apply the indirect costs rates on expenditures which are determined by ACSS to be allowed. Indirect costs can be

budgeted on the whole grant but should only be drawn down after appropriately applied. Completion reports should show indirect costs applied appropriately. If completed correctly in one year, the indirect costs can then apply to carryover in the following year; however, the most recent indirect cost rate available must be applied to the carryover. ACSS without a negotiated indirect cost rate, including subrecipients with lapsed indirect cost rates, may elect to charge a de minimis rate of 10% of modified total direct costs (MTDC) which may be used indefinitely. No documentation is required to justify the 10% de minimis indirect cost rate. Costs must be consistently charged as either indirect or direct costs (§200.403), but may not be double charged or inconsistently charged as both. If chosen, this methodology once elected must be used consistently for all Federal awards until such time as a ACSS chooses to negotiate for a rate, which the ACSS may apply to do at any time.

#### Calculation of Restricted Indirect Costs Budgeted

When ACSS applies an indirect-cost rate, the Federal Program Director in charge of the grant will work with the CFO in the calculation of the dollar amount.

The following procedures will be followed:

- The indirect cost rate will be calculated for the current fiscal year and will be applied to actual expenditures each fiscal year.
- Equipment purchases will be deducted before applying the indirect-cost rate.
- The indirect costs will be removed from the balance before the indirect rate can be applied (this prevents paying indirect costs on indirect costs).
- ACSS will have a state-negotiated indirect-cost rate.

To apply the indirect cost rate by fiscal year, ACSS will initially budget for indirect cost using the most current rate available.

#### Calculation of Restricted Indirect Costs Budgeted Applied to Actual Expenditures

The approved indirect cost rates calculated are valid from July 1 through June 30 of the applicable fiscal year of approval. Indirect costs are recovered only to the extent of direct costs incurred. The indirect cost rate is applied to the direct cost amount expended, not to the grant award allotted.

Once the indirect cost budget is determined, the ACSS must consider how to apply the indirect cost rate to actual expenditures incurred. When applying the indirect cost rate, ACSS will consider that the amount budgeted is the maximum amount that may be applied. ACSS will also consider the fiscal year in which the expenditures are incurred, as the indirect cost rates are applicable to a 12-month fiscal year period and not the complete 15-month grant award period.

To apply the indirect cost rate, the applicable fiscal year rate should be considered for the period in which expenditures are incurred. It should be noted that the expenditures are not necessarily incurred in the same period in which the cash is paid for the expenditures. For example, the summer accruals for salaries and benefits to satisfy the contract period for 10-month employees are expenditures incurred prior to June 30th, although the cash

paid for the salaries and benefits outflows in July and August. The indirect cost rate changes each July, unless the district chooses to apply the lower rate that was established the previous fiscal year.

Program Process for Verifying Indirect Cost Rate:

Title I Part A Title I, Part A checks during budget approval to ensure the LEA uses the correct restricted rate and that their budgeted amount is not greater than what is allowed. Indirect costs are also checked during CFM to ensure that what was drawn down for their indirect costs aligns with the percentage of Title I funds expended.

Title I, Part C checks during budget approval to ensure the LEA uses the correct restricted rate and that their budgeted amount is not greater than what is allowed. Indirect costs are also checked during CFM to ensure that drawn down aligns with the percentage of Title IC funds expended.

Title III Part A checks during budget approval to ensure the LEA uses the correct restricted rate and that their budgeted amount is not greater than the 2% of what is allowed. Indirect costs are also checked during CFM to ensure that drawn down aligns with the percentage of Title III funds expended.

Title V, Part B program staff members verify that the budget matches or does not exceed the indirect cost rate during budget approval. Program staff members also verify the correct indirect cost rate usage during cross functional monitoring and/or program monitoring visits to ensure drawdowns for indirect costs align with the percentage of REAP funds expended.

Title expenditures are supplemental to schools' budgets. Personnel are in addition to the number of personnel required to meet maximum class size as determined by GaDOE. Title/Federal funds are used only to supplement and, to the extent practical, increase the level of funds that would, in the absence of Title I/federal funds, be made available from non-federal sources for the education of students participating in Title I/federal programs. A schoolwide program does not need to demonstrate that Title I funds are used only for activities that supplement, and do no supplant, those the school would otherwise provide with non-federal funds if the district is providing equitable services to all schools in the district. Conversations regarding supplement vs. supplant are held periodically throughout the school year. Title program funds do not support programs that were paid with state or local funds unless there has been evidence of precipitous decline. All principals are made aware of the supplement not supplant issue during the training that takes place during the summer and/or at the starting of the school year. The Federal Programs Director reviews budget requests to ensure that supplanting is not taking place. Supplement vs. supplant is at district level as to how funds are distributed across and is no longer at the expenditure level,

IDEA Indirect Cost amounts are determined through conversation between the CFO and SPED Director. The information provided by GADOE in reference to Indirect Cost is

utilized in the conversation to determine an agreed upon amount that should be put in the budget for this expense. Rev. 11.8.22

Federal programs use the follow questions to ensure that programs are supplementing, not supplanting: Respond "NO" to the following questions:

- 1. Would other monies from the state, local, or other federal resources have been used to pay for the item or service?
- 2. Was the item or services provided with non-federal funds in the previous year?
- 3. Was the item or services provided to participating children with Title funds (Title I schools) and to non-participating children (non-Title I schools) with non-federal funds?

The Federal supplement, not supplant provision is intended to ensure that services provided under Title I and all federal programs are used to supplement (increase the level of services), and not supplant (replace). Section 1116(b)(2); supplement, not supplant methodology will be follow to demonstrate that the allocation of funds is the same as it would be in the absence of Title I and all other federal funds.

Program Directors approve all expenditures to monitor for supplanting issues and use guidelines as follows:

The following guidelines will be used for Title I Schoolwide Programs and Targeted Assistance Programs:

- Equitable distribution of non-Federal funds requires that a schoolwide program shall use Title I funds only to supplement the amount of funds that would, in the absence of the Title I funds, be available from non-Federal sources for the school, including funds needed to provide services that are required by law for students with disabilities and English Learners.
- Supplemental activities are determined by the Appling County School System such that non-federal funds are distributed to all schools across the district in equitable ways. Furthermore, per pupil allocation by grade band will be used to equitably distribute Title I funds.
- To demonstrate compliance with supplement not supplant, the school system updates and submits to the GaDOE yearly a Resource Allocation and Management Plan (RAMP) that ensures that each Title I school receives all of the state and local funds it would otherwise receive if it were not receiving Title I funds.
- Except for the ESSER grants, the ESSA comply with supplement not supplant prevision.

#### **SECTION 4: REQUISITION PROCESS**

Purchases made by Appling County School System will follow the rules and guidelines of the Appling County Board of Education, Georgia Auditing Guidelines and CFR 200.322 Domestic preferences for procurements: As appropriate and to the extent consistent with law, the ACSS should, to the greatest extent practicable under a Federal award, provide a preference for the purchase, acquisition, or use of goods, products, or materials produced in the United States including but not limited to iron, aluminum, steel, cement, and other manufactured products.

Effective FY23 - Requisitions will be completed using the YOSS Platform Flow System:

- 10. Requisitions will be completed by the staff member requesting the purchase.
- 11. Requisitions will be submitted to the building principal for approval.
- 12. Building Principal submits the requisition to the Program Administrative Assistant at the Central Office.
- 13. Program Administrative Assistant checks fund balance (function, object, etc.) and codes requisition.
- 14. Program Administrative Assistant submits requisition to Program Director for approval.
- 15. Program Director checks fund balance (SIP, allowability, prices, and vendor/procurement verification) and submits to Accounts Payable
- 16. Accounts Payable submits requisition to the Superintendent for approval.
- 17. Once Approved by the Superintendent, Accounts Payable enters the information into the computer to generate a purchase order.
- 18. The YOSS System emails the purchase order to the Program Administrative Assistant to process the order by fax/Email to the vendor. Revised August 2022.

**Check Request will follow this process:** Only if Purchase Orders are not accepted or emergency situations.

- 4. The check request form is submitted to Accounts payable to secure Superintendent's signature and approval.
- 5. If approved, check and tax-exempt form is provided to the requestor.
- 6. Check and receipt/invoice and required/supporting documentation for each individual federal program is uploaded in the YOSS Platform as a Non-PO Invoice and then follows the YOSS approval process like any other requisition.

#### The following procedures are implemented upon receipt of the materials:

- 7. The Program Administrative Assistant/designated staff member/Director inventories the shipment by checking off, on the packing slip, items received.
- 8. The Packing slips are attached to the PO and stored in the central office.
- 9. The Invoice is uploaded in the YOSS Platform where the Administrative Assistant verifies the code then sends it to the Program Director for approval.
- 10. The Program Director approves the Invoice and submits it to Accounts Payable.
- 11. The Accounts Payable then processes the payment for the purchased item.
- 12. The Administrative Assistant/Director adds the purchase order number to program budget logs.

## **SECTION 5: FAMILY-SCHOOL PARTNERSHIP PROGRAM**

(Revised 9-19-2022)

## PARENT AND FAMILY ENGAGEMENT PROCEDURES, EXPECTATIONS, AND TECHNICAL ASSISTANCE

In support of strengthening student academic achievement, Appling County School System (ACSS), has developed procedures and expectations for the Parent and Family Engagement Program which establishes the district's expectations for meaningful and effective family engagement and guides the strategies and resources that strengthen school, family, and community partnerships in the district's Title I schools including GBCH, an N&D facility. (Personnel in charge of GBCH act as parent of students residing at GBCH and are provided with the same opportunities, participation and information as the rest of the parents in the Title I schools).

The Title I Parent and Family Engagement team is committed to engage families in the education of their children, to build the capacity of its staff and parents in implementing family engagement strategies, and to reach the district's goals for increased student academic achievement. Schools, families, and the community will work together to support learning for students to do better in school, stay in school longer, and enjoy school more.

Title I, Part A, provides technical assistance to all Title I schools on effective parent and family engagement activities. ACSS will follow Section 1116 of the Every Student Succeeds Act (ESSA) to fulfill all the requirements for all Title I schools and school systems to involve parents and family members in their children's education.

Consistent with Section 1116, the district will work with its Title I schools to ensure that input is provided by parents, teachers, and community in the revisions, development and approval of the district and school-level Family Engagement Plans, School-Parent Compacts, 1% PFE's set-aside plus 1%, and activities that will increase the collaboration and communications between the schools and parents. To ensure compliance, Family Engagement Coordinators may use the Georgia Department of Education's Parent and Family Engagement Checklist and the Cross Functional Monitoring Instrument.

The district level Family Engagement Coordinator, provides technical assistance to all Title I schools during the school year. Technical assistance meetings are held quarterly at the district office, on-site at each school, or through virtual meetings. Technical assistance is also provided through email and through the sharing of documents via Google Drive. Feedback is provided to Family Engagement Coordinators at each school to meet their school's individual needs.

The following components are included in the TA and are documented via email correspondence, agenda, sign-in sheets and minutes:

- Family Engagement Program Overview & Requirements
- Timeline/Calendar of Events including Due Dates
- Distribution in Multiple Ways
- Annual Title I Parent Meeting
- Building Staff Capacity
- Building Parent Capacity
- Stakeholder Input
- School Parent & Family Engagement Policy
- School-Parent Compact
- Parent Notifications
- Parent Resources
- Communication/Correspondence in Another Language
- Surveys (Input, Annual Title I)
- Other technical assistance as requested by School Family Engagement Coordinators

#### **TIME LINE**

Time lines for Parent and Family Engagement activities are set in the spring and revised at the beginning of the school year. All school coordinators have access to a shared Google drive with the calendar of events for technical assistance. Family Engagement events are shared through multiple methods including flyers, school website, social media, phone calls, email, media outlets, etc.

#### **ANNUAL PARENT NEEDS ASSESSMENT**

#### Process to Collect:

To assess parent and family engagement practices, parent surveys are posted online on the district website and on school websites. The surveys are collected and tallied for each school and the district. Survey results are discussed and reviewed in technical assistance meetings, school leadership meetings, and at Parent Advisory/School Council meetings. Information from survey data is utilized to revise the District Family Engagement Policy, School Family Engagement Policies, and School Compacts. The information is also used to plan activities for subsequent years.

All family members of Title I students are provided opportunities to have meaningful input for the development of family engagement activities, programs, and procedures. This includes the annual review and revision of the School Parent and Family Engagement Policy/Plan and School-Parent Compacts. Family input is also required when planning Title I Part A family engagement budgets. One percent of at least 90% of the budget must be set aside for family engagement. Input into building the capacity of school staff in how

to best communicate with and build partnerships with parents and families is also required by ESSA. In addition, ESSA requires that LEAs receiving these funds must conduct an annual evaluation of the content and effectiveness of the parent and family engagement policy and program.

The findings of the evaluations/surveys are used to design strategies for more effective Parent and Family Engagement activities and to revise, if necessary, the District and School-level Parent and Family Engagement policies, School-Parent Compacts, use of the 1% set-aside, current parent engagement activities, and any other concerns that arise as a result of the surveys. Additionally, the LEA and each participating school may review documentation such as records of parent contacts, feedback forms, family engagement event participation, and other appropriate documentation as part of the review process. All information will be used to identify strengths and weaknesses of the total Title I Parent and Family Engagement program.

All parents are invited to attend and provide input each year regarding School-level Parent and Family Engagement Policies and School-Parent Compacts.

#### Process to Review:

The results of input surveys, annual parent surveys, and other parent feedback are reviewed by District and School Family Engagement Coordinators. All information is used to identify strengths and weaknesses of the Parent and Family Engagement Program. Results are also used to make revisions or recommendations to the Parent and Family Engagement Policy/Plan and the School Parent Compact.

#### **DISTRICT AND SCHOOL PARENT & FAMILY ENGAGMENT POLICY**

Appling County School System will jointly develop, and agree on with, and distribute to parents and family members of children receiving services a written parent and family engagement policy. The Appling Parent and Family Engagement Policy outlines how the district will implement programs, activities, and procedures for the engagement of parents in Title I programs. The policy will establish the district's expectations for parent and family engagement and how the district will carry out the parent and family engagement requirements.

School Parent and Family Engagement Policies/Plans are reviewed and revised annually by parents, community, administrators, staff from the schools, and parent advisory/school council committees. All parents are invited to participate on the committees The Parent and Family Engagement District and School Policy/Plans are distributed through multiple methods (at least two). Policies/plans include the required components of the parent and family engagement checklist. Policies/Plans include engagement activities that have been identified and requested through the previous year's annual parent and family engagement survey. School improvement and parent and family engagement plans are posted on the school websites, available at the schools upon request. English and

Spanish District and School-level policies are distributed through multiple methods (at least two) before November 1<sup>st</sup> of every school year.

#### The policy will:

- Involve parents in the joint development and the process of school review and improvement.
- Provide the coordination, technical assistance, and other support necessary to assist participating schools in planning and implementing effective parent engagement activities to improve student achievement and school performance.
- Build the schools' and parents' capacity for strong parental engagement.
- Coordinate and integrate parental engagement strategies under this part with parental engagement strategies under other programs, such as the Head Start program, Parents as Teachers program, and Home Instruction Program for Preschool Youngsters, and State-run preschool programs.
- Conduct, with the engagement of parents, an annual evaluation of the content and effectiveness of the parental engagement policy in improving the academic quality of the schools served under this part, including identifying barriers to greater participation by parents in activities authorized by this section (with particular attention to parents who are economically disadvantaged, are disabled, have limited English proficiency, have limited literacy, or are of any racial or ethnic minority background), and use the findings of such evaluation to design strategies for more effective parental engagement, and to revise, if necessary, the parental engagement policies described in this section.
- Involve parents in the activities of the schools served under this part.

English and Spanish District and School-level policies will be distributed through multiple methods (at least two) before November 1<sup>st</sup> of every school year.

### **SCHOOL-PARENT COMPACT**

All Title I Schools have and will continue to:

- Provide evidence of a signed and dated school-parent compact with the required components that includes being developed jointly with parents, describes how parents, the entire school staff, and students will share the responsibility for improved student achievement, addresses the importance of communication between teachers and parents on an ongoing basis through at a minimum, parent-teacher conferences in the elementary schools at least annually, during which the compact is addressed, frequent reports to parents on their child's progress, and reasonable access to staff, opportunities to volunteer and participate in their child's class, and observation of classroom activities.
- School-Parent Compacts include responsibilities for the system, school, parents, and students. Components of the School-Parent Compacts are revised each year by parents, community, administrators, staff from the

schools, and the Parent and Family Engagement Committee at each school/district. Copies of the signed and dated parent School-Parent compacts are kept on file with the School Family Engagement Coordinator. A School-Parent compact checklist is located on the Title I page of the GADOE website under resources that is used as a guide to implement changes or additions to the School-Parent Compacts. The School-Parent Compacts are reviewed at the Annual Title I meeting and copies are included in student handbooks which are shared with parents at the beginning of the year.

English and Spanish Student-Parent Compacts are distributed through multiple methods (at least two) before November 1<sup>st</sup> of every school year.

#### **ANNUAL TITLE I MEETING**

All Title I Schools have and will continue to convene an Annual Title I meeting to:

- Inform participating parents about Title I programs
- Convene at a convenient time, to which all parents of participating children shall be invited
- Encourage all parents to attend and inform parents of their school's participation under this part and to explain the requirements of this part, and the right of the parents to be involved in their child's education.

The Annual Title I Meeting will cover the following topics:

- o What is a Title I school?
- How does our school spend Title I money? How is Title I Parent and Family Engagement money spent?
- o How does our school participate in the Title I Program?
- What are our school's Title I (schoolwide or targeted assistance) requirements?
- Schoolwide Program Past and Present
  - What are our schoolwide goals?
  - What programs/supports are in place to help my child?
  - What is the state's grades report for our school?
- O What curriculum does our school use?
- What tests will my child be taking (include WIDA ACCESS and Alternate Assessments)?
  - o How do these tests measure my child's progress?
  - o What proficiency levels is my child expected to meet?
  - How to access previous test performance, standards, and attendance about my child using the Statewide Longitudinal Data System (SLDS) through the school's parent portal (if applicable)?
- What is required by law for Parent and Family Engagement?
  - o What is the district's Parent and Family Engagement Policy?
  - o What is the school's Parent and Family Engagement Policy?
  - o What is a School-Parent Compact?
- Does my child's teacher meet professional qualifications?

- O What is a parent's right to know?
- O What is a 20-day letter?
- What opportunities does the school provide for family engagement?
  - o List family engagement opportunities offered for school or home
  - List volunteer opportunities
  - List parent decision making opportunities/meetings/councils
- How responsive will the school be to my questions when staff is contacted?
  - Provide staff contact information

#### **BUILDING CAPACITY FOR INVOLVEMENT**

All Title I Schools have and will continue to ensure effective involvement of parents and to support a partnership among all Title I schools, parents, and the community in order to:

- Improve student academic achievement.
- Provide assistance to parents of children served by the school in understanding such topics as the State's academic content standards and State student academic achievement standards, State and local academic assessments, the requirements of this part, and how to monitor a child's progress and work with educators to improve the achievement of their children.
- Provide materials and training to help parents to work with their children to improve their children's achievement, such as literacy training and using technology, as appropriate, to foster parental involvement.
- Educate teachers, pupil services personnel, principals, and other staff, with the assistance of parents, in the value and utility of contributions of parents, and in how to reach out to, communicate with, and work with parents as equal partners, implement and coordinate parent programs, and build ties between parents and the school.
- Coordinate and integrate parent engagement to the extent feasible and appropriate programs and activities with Head Start, public preschool and other programs, and conduct other activities, such as providing parent resources that encourage and support parents in more fully participating in the education of their children.
- Ensure that information related to school and parent programs, meetings, and other activities is sent to the parents of participating children in English and Spanish or in a language and format that parents can understand.
- Provide such other reasonable support for parental engagement activities under section 1116, that parent may request.

Many opportunities are provided for building strong staff and parent capacity. The purpose is to ensure the effective engagement of parents and to support a partnership among the schools, parents, and the community to improve student academic achievement, through the following activities:

- Annual Title I meetings
- Conferences
- Email communications
- Phone calls
- Parent sessions and activities
- Virtual Meetings
- Family nights
- Volunteering
- PTO meetings / Parent Advisory/School Council Meetings
- Board of Education Meetings
- Stakeholder meetings
- Open Houses
- Annual notification of accountability status
- Newsletter/flyers/brochures/website information

#### NOTICE TO PARENTS OF ENGLISH LEARNERS

As a district under the direction of Title I, Part A, parent notifications are provided to parents during the first week of school by the service provider. Beginning in FY18, the ACSD, provided notifications, in a language appropriate for the reader, to parents of ELs who have been selected to participate in the LEA's Title III or Title I supplemental language program. The same process will continue for every school year. The notice will be provided 30 days in advance of any supplemental language program to permit the parent to waive participation in the Title-funded services. The federally-funded supplemental language program notification is part of the beginning of the year notification process for parents of ELs. Parents of students who do not attend these meetings will also receive this information no later than 30 days after the beginning of the school year. Verification of distribution will be documented utilizing one of the following methods:

- 1. Signed and dated district or school staff dissemination statement indicating that the notification was sent home with each participating EL
- 2. Parent-Teacher Conference(s) with sign-in sheet of parents' signatures, dates, and names of documents discussed.
- 3. Copy of secure mail with date and email address of parent
- 4. Mailed letter with a dated postage receipt and list of mailing addresses
- 5. Picture of student folders with name of document and date of when document was distributed
- 6. Screenshot of notification in a secure parent portal with date of when notification was available to individual parents
- Other secure method that the APPLING has used to effectively notify parents of participating EL

All service providers will be required to send their dissemination statement to the LEA Federal Programs Director as documentation of compliance. The dissemination statement will include the language of distribution, date of dissemination, and other pertinent information. Revised 11.9.2022

#### Appling County School System

#### Parent Notification of Student Eligibility for English to Speakers of Other Languages Program and Supplemental Language Instruction Services

Student Name:		Date:		
School:		Grade Level:	Teacher:	
Dear Pare	nts/Guardians:			
The purpo		ed on the following	ng test of English Language Proficiency (E	ELP)
	ified as an English Learner (EL) inuing as an English Learner (EL)			
	Kindergarten screener WIDA Screener® (Grades 1 – 12) ACCESS for ELLs 2.0® Alternate ACCESS for ELLs®	Oral Proficiency CPL Score: CPL Score: CPL Score:		
on the Kind		on the WIDA Scre	s/her level of Oral Proficiency was <b>less tha</b> eener for Grades 1-12. Federal law require e ACCESS for ELLs 2.0.	
Listening, delivery va	Speaking, Reading, and Writing and re	einforcement of Ge rade levels. Your o	support English language acquisition in Georgia's Standards of Excellence. Prograt child may also receive supplemental lang t academic success.	ns of uage
	ESOL Language Program		Supplemental Language Support Se	
	nild receives English language instruction in v model:	n the following	Your child <u>may</u> receive one or more of the for supplemental language support services:	ollowing
	<b>Pull-Out:</b> EL students are taken out of a class for the purpose of receiving small grinstruction from the ESOL teacher.		Afterschool: Supplemental Langua Support Services during the regular year.	
	<b>Push-in:</b> EL students remain in their core where they receive content instruction fro area teacher along with targeted language an ESOL teacher.	m their content	Summer School: Supplemental La Support Services during the month	
	Scheduled ESOL class: In a class comp EL students receive instruction in foundat instructional English as well as in the acad of content.	ional social and	Supplemental Distance Learning: Supplemental Language Support Siduring the regular school year.	
			reasing the English and academic skills o ate for all students is <b>92.8% or higher.</b>	f
			August	2021
	Appling	g County School	ol System	
	ild has a disability, his/her language pro are documented in the student's Individ		re developed in conjunction with special ed n Plan (IEP).	ucation
The school	ol will exit your child from this ESOL La	nguage Program a glish Proficiency.	and Supplemental Language Services who Appling County School System EL exit cr	en he/ iteria is
Please co	ontact the person listed below if you wou different language instruction services	uld like to decline p	he supplemental language instruction servi participation for your child, if you would lik would like to learn about our parent meetin	e to talk
Name: S	elect A Name		Phone Number:	-
E-mail: S	elect An Email Address			
	the status of your child's academic ach "Infinite Campus Parent Portal.		e click here to log-in to the school's online p	parent

#### Appling County School System

Notificación a los padres de la elegibilidad de los Alumnos al Programa de Inglés para Hablantes de Otros Idiomas (ESOL) y Servicios Complementarios de Enseñanza del Idioma

	ado: Maestro(a):		
Estimados Padre de Familia o Tutor Legal:			
El propósito de la presente carta es notificarle que en (ELP), su hijo(a) ha sido:  Identificado(a) como Aprendiz del Idioma Inglé	base a los siguientes exámenes de Dominio del Inglés és (EL)		
Continuara como Aprendiz del Idioma Ingles (	EL)		
☐ Evaluación de kindergarten☐ WIDA Screener <sup>®</sup> (Grados 1- 12)☐ ACCESS for ELLs 2.0 <sup>®</sup> ☐ Alternate ACCESS for ELLs ®	Competencia Oral: Puntaje de CPL: Puntaje de CPL: Puntaje de CPL:		
Evaluación de Kínder y menos de 5.0 en WIDA Screen	i, porque su nivel de Competencia Oral fue menos de <u>29</u> en la er para los grados 1-12. La ley Federal requiere que las del Inglés anualmente usando el Examen ACCESS for ELLs		
Ingles en las maneras de Escuchar, Hablar, Leer y Es Educativos de Georgia. Los programas de instrucciór Su hijo(a) también puede recibir servicios complement idioma ingles y apoyar el éxito académico.	strucción diseñado para apoyar la adquisición del lenguaje cribir, así como reforzar los Estándares de Excelencia n varían de una escuela a otra y entre los niveles de grado. tarios de enseñanza del idioma para desarrollar destrezas de		
Programa ESOL	Servicios complementarios de enseñanza del Idioma		
Su hijo(a) está recibiendo la enseñanza del inglés como se usa en la escuela, a través de uno de los siguientes modelos* de enseñanza de ESOL:	Su hijo <u>puede</u> recibir uno o más de los siguientes servicios de apoyo Lingüístico Suplementario:		
En otra aula: Se retira a los aprendices de inglés de la clase de educación general con el propósito de recibir instrucción del idioma en grupos pequeños de parte del docente de ESOL.	Después de clases: Servicios suplementarios de apoyo lingüístico durante el año escolar regular. Escuela de verano: Servicios suplementarios		
En el aula: Los aprendices de inglés permanecen en su aula académica principal donde reciben la enseñanza de contenidos de parte del docente de contenido, junto con la enseñanza del idioma específico de parte de un docente de ESOL.	de apoyo lingüístico durante el mes de junio.  Aprendizaje a distancia suplementario: Servicios suplementarios de apoyo lingüístico durante el año escolar regular.		
Período programado de clases de ESOL: En una clase compuesta por aprendices de inglés únicamente, los alumnos reciben instrucción de inglés social fundacional e instructivo, así como en los idiomas académicos de los contenidos.			
	as son efectivos para aumentar las habilidades académicas y atoria (High School), la tasa de graduación que se espera de		
	August 2021		
Appling Co	unty School System		
Por favor tenga en cuenta que si su hijo(a) tiene una discapacidad, el personal de educación especial junto con el personal de apoyo al idioma han determinado los servicios del idioma según lo especificado en el Programa de Educación Individualizada (IEP).			
La escuela retirará a su hijo(a) del Programa de ESOL y Servicios Complementarios del idioma cuando él(ella) alcance el nivel de dominio de Ingles establecido por el distrito. El distrito escolar de Appling County tiene el nivel establecido en 4.5-4.9 en el examen de ACCESS 2.0 y el acuerdo del equipo de reclasificación.			
Usted tiene el derecho de rechazar el programa de ES Complementario señalados previamente. Favor de co continuación si desea rechazar la participación de su I del idioma ofrecidos, o sobre las reuniones de padres	municarse con el personal escolar que se nombra a nijo(a), hablar sobre los diferentes servicios de enseñanza		
Nombre: Select A Name Correo electrónico: Select An Email Address	Teléfono:		

Para ver el estado del logro académico de su hijo(a), inicie sesión en el portal en línea para padres: Infinite Campus Parent Portal -- <a href="https://campus.appling.k12.ga.us/campus/portal/parents/appling.jsp">https://campus.appling.k12.ga.us/campus/portal/parents/appling.jsp</a>

46 | Page

#### **PARENT NOTIFICATIONS**

As required by GaDOE, Notification of current CCRPI status as well as the criteria the CCRPI designation which is Title I Distinguished, Title I Reward, Comprehensive Support and Improvement (CSI), Promise, Target Support and Improvement (TSI), and Additional Targeted Support (ATSI) Schools are provided to parents. Principals revise the letters to meet their school's status and other personalization, place them on school letterhead with contact information, and send them home with students at the beginning of school. Letters are distributed to parents and documentation of when and how the letters are sent to parents as well as a copy of the letter is sent to the Federal Programs Director. Additionally, GADOE's Title I brochure is available which contains mandated parent information.

#### **STAFF CAPACITY**

ACSS seeks meaningful input from parents, families and the community to develop professional learning activities to support and encourage staff capacity. Professional learning activities based on the National PTA Standards for Family-School Partnerships are used as the guide to build capacity.

The following standards will be presented throughout the school year.

- Standard 1: Welcoming all family members in to the school community
- Standard 2: Communicating effectively
- Standard 3: Supporting student Success
- Standard 4: Speaking up for every student
- Standard 5: Sharing power
- Standard 6: Collaborating with the community

#### **PARENT/GUARDIAN CAPACITY**

To build a capacity for strong family engagement and to support and encourage partnerships among schools are very important goals of the District. Positive parent-teacher and community relations are standards that the Appling County School System's Title I program will enable and assist schools to uphold.

These standards will be accomplished and maintained through training and instruction of both parents and educators, carried out through family engagement meetings, parent sessions, parent conferences, brochures and other media, personal contact with families through PTO meetings, Parent Advisory/School Council meetings, and other avenues of learning that are appropriate for the information to be conveyed.

The focus to build capacity will be the outcomes of the annual parent needs assessment, parent session evaluations, input given at parent and committee meetings, and state assessments.

Resource are provided at each Title I school for families and students in the school system. These resources are funded primarily by Title I and designed to provide one-on-one contact with parents, home visits, workshops/parent meetings, referrals to other community agencies, educational materials for loan to families, and training on using the materials effectively with students.

Each school is required to develop with and distribute to parents a written school parent compact and school plan/policy. Schools hold an annual Title I meeting to keep parents informed of all aspects of the Title I program. The meeting agenda, sign-in sheets, and other documentation are kept on file locally. All parent sessions are advertised through multiple means including any of the following: local news media, parent flyers, school website, system website, shout point call system, texts, announcements, and placement on the school marquee sign.

In addition to annual meetings, activities at the school level may include the following:

- Active PTO Meetings, Parent Advisory/School Council Meetings
- "Good Citizen" recognition
- "Super Job" winners
- ABC Club
- Honors Day/Honors Night
- Student handbooks/planners
- Parent conferences
- School council meetings
- Parent and Family Engagement committee meetings
- Parent or Family Night/Grade Level Orientation
- Parent lunch days
- Career Days (parents and community resource people as guests)
- Spring Fling/Fall Festival
- Fall Fitness Run
- Dr. Seuss Day
- Accelerated Reader Celebration Days
- CHAMPS Picnic
- CHAMPS Graduation
- Media center book fairs (held twice each year)
- Transition meetings (Pre-K to kindergarten, second to third, fifth to sixth, and eighth to ninth)
- Parent Portal Training
- Pre-K Family Orientation
- Curriculum Nights
- Annual Title I Meetings
- Open House
- Homework Tips for Success
- Test Tips
- Math Night

- Literacy Night
- Technology Night
- Family Fun Reading and Math Nights
- Internet Safety
- Introduction to the Online Assessment System

To build effective parent capacity in the Appling County School System and to support a partnership between, parents, community and schools, all topics from the six shalls and Section 1112(e)(3)(C) must be covered at some point during the school year, but the number of parent capacity sessions may vary. Certain activities or communications may meet some or all six shalls.

#### Shall #1

- Challenging State academic standards
- State and local academic assessments, including alternate assessments
- What is Title I and parent rights
- How to monitor a child's progress
- Work with educators to improve the achievement of their children

#### Shall #2

 Materials and training to help parents to work with their children to improve their children's achievement, such as literacy training and using technology (including education about the harms of copyright piracy)

#### Shall #3

See Checklist for Building Capacity of School Staff

#### Shall #4

 Parent and family engagement programs and activities coordinated and integrated with other Federal, State, and local programs, including public preschool programs, and conduct other activities such as school transitions and parent resource centers that encourage and support parents to fully participate in the education of their children

#### Shall #5

 To the extent practicable, information related to school and parent programs, meeting invitations, agenda, and other meeting materials were in a language and format parents can understand

#### Shall #6

• Other reasonable support for family engagement activities as parents may request:

Schools may include the following activities to ensure compliance:

- Provide parents information on the state's, Georgia's, academic content standards and state and local academic assessments.
- Disseminate test results, progress reports, and report cards.
- Report the child's progress to parents and assist parents in how to monitor a child's progress and how to improve achievement at home.
- Conduct an Annual Title I meeting in each Title I school in Appling County that will provide all parents information of the requirements of Title I and

- section 1116 (e) building parent capacity, including information on the District Parent and family engagement Policy, school parent plans, School-Parent Compacts, and means to build parent capacity.
- Provide information concerning the Title I program and all state requirements of parent and family engagement.
- Provide parent/ teacher conferences and open house held at the schools.
- Conduct an annual parent needs assessment and parent session evaluations to gain input for future program development.
- Develop and disseminate through multiple methods, the District Level Family Engagement Policy/Plan, School Family Engagement Policy/Plan and School Parent Compact
- Provide support and/or training for parents in areas such as literacy, mathematics, and technology.
- Ensure information related to school and parent programs, meetings, and other activities are sent home "in an understandable and uniform format and to the extent practicable, in a language the parents can understand."
- Provide parents information on the professional qualification of their child's teacher at the beginning of each school year.
- Collect feedback and input from parent's comments regarding school activities and plans.
- Utilize parent input to provide training/ workshops to build staff capacity and to educate school staff on the value of working with parents as partners, building ties between parents and the school.
- Periodically assess and analyze the effectiveness of the Parent and Family Engagement program and make changes/ revisions as needed.
- Appling County Title I schools will follow a timeline to ensure these standards are in place and events are monitored.
- The District Family and Parent Engagement Coordinator provides technical assistance training throughout the year.
- The School Parent and Family Engagement Coordinator will utilize the GaDOE checklist and cross functional monitoring tool to ensure compliance. Each school will keep a hard copy of all information in a file box at the school.
- The District Family and Parent Engagement Coordinator will monitor documentation after each semester to ensure that the events are taking place and documentation is maintained.

### **PARENT RESOURCES**

Appling County has parent resources available at each Title I School. The School Family Engagement Coordinator at each Title I school is available to assist parents/students with resources to support academic achievement.

#### **PARENT ADVISORS**

All Title I schools have parents who serve on the Parent Advisory/School Council, the Parent Teacher Organization (PTO), and/or school committees. These parents serve as advisors to the schools and system as a whole. The valuable insight attained from these advisors is utilized to propel our system to excellence for all students and to review required components of the Title I program (CLIP, CCRPI/implementation plans, budgets, and parent and family engagement). Invitations to the meetings may be written invitations, phone calls, emails, and/or school website and/or system websites. Schools also use their advisors, as well as, all parents who attend the annual Title I meeting, to review the required components of the schoolwide or targeted assistance program. The meetings are open to the public and-notification may include local newspaper ads, parent flyers, school/system website postings, shout point call system, texts, announcements, and placement on the school marquee sign. Parents are instrumental in the revision of the School Improvement/Parent and Family Engagement Plans and School-Parent Compacts. School Level Parent and Family Engagement Committees review the results of the annual spring survey and help make decisions for yearly Parent and Family Engagement activities. All meetings are documented with sign in sheets, agendas, and other documentation (minutes, handouts, PPT slides, etc.).

## COMMUNICATION CORRESPONDENCE IN ANOTHER LANGUAGES/FORMAT

Correspondence in another language or formats, to the extent practical, is provided by either written support or support through an interpreter. Documents are provided in Spanish and English which are the major languages spoken in Appling County. In addition, the system contracts with Bilingual and Special Education staff to translate documents, interpret, or provide additional support at district and school level meetings. Bilingual Migrant Student Service Providers provide interpreting and translation services specifically to migrant children and families. Parent and Family Engagement meetings and nightly school Parent and Family Engagement functions have interpreters available at these events to assist parents with translation and interpretation. In addition, the Federal Programs Director is bilingual in Spanish and English and is present at many of these functions.

# PARENTS RIGHT TO KNOW TEACHER QUALIFICATIONS/LETTERS TO PARENTS REGARDING PROFESSIONAL QUALIFICATIONS STATUS AND 20 DAY NOTIFICATIONS

In the summer, the Federal Program Director contacts all principals and provides templates to use for the upcoming school year on Parents Right to Know Teacher Qualifications and 20 Day Notifications. Parents are informed of their rights to know the qualifications of their children's teacher through the student handbook and system website. This notification will be provided in the Student Handbook for each school. Parents will be provided a copy of the Student Handbook at the beginning of each school

year or, for transfer students, upon enrollment. Each school will maintain documentation of parent receipt of information which will include parent signature. A copy of the Student Handbook for each school and sample parent forms will be maintained by Title I Department.

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

- O Whether the student's teacher:
  - has met State qualification and licensing criteria for the grade levels and subject areas in which the teacher provides instruction;
  - is teaching under emergency or other provisional status through which
     State qualification or licensing criteria have been waived; and
  - is teaching in the field of discipline of the certification of the teacher.
- Whether the child is provided services by paraprofessionals and, if so, their qualifications.
- In Georgia, notification must occur within 30 days from the start of school or upon enrollment.
- LEAs must include and disseminate the following information:

Parent's Right to Know Notification	20 Day Notification
ESSA Sec. 1112€(1)(A)	ESSA Sec. 1112€(1)(B)(ii)
<ul> <li>The Right to Know Notification informs parents that they have the Right to Know and request the Professional Qualifications of their child's teachers and paraprofessionals.</li> <li>In Georgia, notification requirements apply to all LEAs and schools/programs within each LEA.</li> <li>LEAs must notify all parents annually at the start of school (within 30 calendar days of the start of school) or upon enrollment.</li> <li>LEAs must use the language of the law.</li> <li>LEAs must maintain records of the notifications.</li> </ul>	The 20 Day Notification informs parents when students have been assigned or taught for four or more consecutive weeks by a teacher who does not meet applicable state or licensure requirements (including professional qualifications developed by the LEA in alignment with an approved charter or strategic waiver application) at the grade level and subject area in which the teacher has been assigned.  In Georgia, notification requirements apply to all teachers in all LEAs and schools/programs within each LEA and must be sent within 10 business days following the four consecutive weeks.  Day Notifications are not required for substitutes and paraprofessionals.

**ALL STUDENTS** 

SPECIFIC STUDENTS

Appling County School System is a Strategic Waiver School System and has waived certification requirements.

#### **20 Day Notifications:**

Note: It is possible for a teacher to meet charter/ strategic waiver APPLING professional qualification requirements and not meet GaPSC in-field requirements. In this circumstance, 20 Day Notification is not required.

#### Special Education Teachers

- 20 Day Notifications must be disseminated if the teacher does not hold special education certification aligned with teaching assignment (General, Adapted, Visual/Impairment, etc.) AND Must have a Clearance Certificate
- o For verification purposes, notifications must contain:
  - Day/Month/Year of notification;
  - Principal's contact information
  - School or APPLING name
  - Name of the teacher who has not met professional qualification requirements;
  - Name of the APPLING and/ or school/program; and,
  - Statement that the teacher has not met State certification OR APPLING charter/strategic waiver professional qualification requirements for the grade level(s) and/ or subject area(s) in which the teacher is assigned. Grade level and/or subject area must be identified.
  - In Georgia, notification requirements apply to ALL teachers in all APPLING schools/programs.
  - A copy of all 20 Day letters sent to parents will be sent to the Title I and Human Resources.
- Regular Education Teachers When students have been assigned or taught for four or more consecutive weeks by a teacher who does not meet APPLING professional qualification requirements (in alignment with approved Charter/SWSS application and CLIP) at the grade level and subject area in which the teacher has been assigned.
- Paraprofessionals and Substitute Teachers- 20 Day Notifications are not required for paraprofessionals and substitute teachers.
  - Paraprofessionals- ESSA does not include paraprofessionals as educators for whom 20 Day Notifications must be sent.
  - Substitutes- O.C.G.A. § 20-2-216/ GaPSC Rule 505-20-.20 requires LEAs hiring and assigning substitutes to ensure substitutes meet state certification requirements or to hire substitutes who most closely meet the requirements for teacher certification and who are available to serve as substitute teachers.

### **SECTION 6: RESERVATION OF FUNDS**

#### **Professional Development:**

In the event that schools in the ACSS is given a designation, Federal Programs Director will ensure funds are set-aside to provide professional development as needed. Professional learning activities that are funded through the collaboration of federal, state and local funds are for activities that are scientifically researched and evidence-based on evidence of program success resulting in increased student achievement.

#### **Parental Engagement Set Aside:**

Required 1% Set Aside for Parental Involvement: Principals have the option of expending their 95% portion of the required 1% set aside plus 1% of PFE's carryover funds in Parent Involvement funds or submitting them back to the system level. Principals, with input from parents, typically decide to direct part of those funds to a system level parent involvement activity/project by signing a District-wide Parent Activity Assurance form. The funds are used at the system level to fund a Family Engagement Specialist who serves all schools and those directly allocated to the schools to fund parent engagement activities. Title I parents are informed about the 1% set aside plus 1% of PFE's carryover funds, during the Fall Annual Meeting and participate in the discussion regarding this requirement each Spring during Title I planning meetings held at each school. If the total 1% plus 1% of PFE's carryover funds, are not expended, the difference must be carried over to the following fiscal year.

#### Homeless Children and Youth Set Aside:

Set aside funds at the system level are budgeted to meet the needs of homeless children and youth. Because of the generosity of many of Appling's local organizations, very few supplies are needed each year.

Homeless liaison, works and consults with community and school personnel, including school counselors, enrollment clerks, teachers, principals, and bus drivers, to identify children in homeless situations. As well as providing a student residency questionnaire completed by all students who are enrolled in the Appling County School System. The homeless liaison monitors and provides the information on the annual count of homeless students attending school in Appling County.

Needs assessments are conducted by the school counselors when a child is identified as homeless. They contact the homeless liaison and other appropriate personnel or agencies. Method #1 is used to calculate set aside amounts.

## Neglected and Delinquent Children

The reservation amount provided by GaDOE in the Title I, Part A allocation letter and worksheet is fully used as a set aside for neglected or delinquent children. Currently, there is one residential facility for neglected children, Georgia Baptist Children's Home and Family Ministries (GBCH), which operates as a facility. GBCH's neglected children

attend Appling County Schools in the zone in which GBCH is located. Delinquent MOWP children are served at GBCH by two professionally qualified teachers. MOWP students are enrolled at the high school and/or middle school but are served at this facility. Survey of Local Institutions for Neglected or Delinquent Children is completed each year and is based on the number of children residing at the home for 30 consecutive days with at least one day being in October.

#### **Private Schools:**

The Federal Programs Director reviews DE1111 records and non-profit status of private schools in order to send invitations to private schools for initial consultation to participate in all federal programs. Invitations are sent in the fall/September/October of each year and when grant opportunities become available during the year. The SLDS platform E4SSs is used to send invitations as well as personal visits are made to private schools as necessary based on the grant opportunities that are made available during the school year. Private schools are invited to attend a meeting with all Federal Program directors. A meeting is held, usually in the months of October or November, to present information about the programs available to students in private schools. Equitable services would be provided to any qualifying private schools that choose to participate in the federal programs. As of this school year, FY23, no private schools have chosen to participate.

The funds will be calculated based identified in the district set aside portion of the consolidated application. The schools would receive an equitable amount from the reservation of funds for instructional and related activities before allocating funds to public schools. Equitable services would then be calculated from the applicable district set asides this year, which were professional learning and parent and family engagement. The amount would be proportionate to the number of private school children from low-income families residing in Title I participating public school attendance areas.

Private schools per pupil allocations would then be derived using the proportionality method. The low-income percentage of each Title I school would be applied to the number of private school children residing in that school attendance area, grade levels, and addresses of the private school students would be used for the calculation.

#### **SECTION 7: ALLOCATIONS/CARRY OVER**

After receiving notification of the Title I, Part A, and other federal programs grant amounts from GaDOE, reservations in each budget are set aside for required components such as parent and family engagement, professional learning, neglected and delinquent, equitable services, school improvement specialist, administration and homeless students.

Per pupil amounts are allocated to schools using grade span groupings in rank order of poverty based on the number of children from low-income families who reside in eligible attendance areas. Beginning with FY18, ACSS was granted CEP status and ACSS uses the numbers provided by the nutrition department and GaDOE FTE school enrollment numbers to determine rank order of the schools. All the information is entered in the GaDOE worksheet and then used to enter information on the attendance worksheet. Higher ranking schools receive the same amount or more than the school ranked below those schools. Per pupil allocation is always large enough to provide a reasonable assurance that each school can operate its Title I program of sufficient quality. The 125% rule is not typically used in the system.

Typically, carryover funds are allocated in one of two ways: (1) to schools by increasing the per pupil amount maintaining rank order, basing that amount on the total number of children from low-income families in each area or (2) the funds are allocated back to set asides.

EdFlex Options for Title I include: Section 1127(a) Part A - Limitations on Carryover. Due to issues with COVID-19, Appling County requested this wavier through the CLIP. The approval by GaDOE will waive the statue on the 15% that can be carried over to the next physical year. To ensure that carryover waiver is not requested in the future, monthly budget sheets will continue to be monitored regularly throughout the year and calculations will continue to be made from these near the end of the school year to determine that no more than 15% will be carried into the following year. Each federal program ensures that all funds are spent in accordance to individual grant guidelines and to ensure carry over funds don't exceed the required percentage by the grant requirement. Revised 3.12.2021

#### **SECTION 8: ATTENDANCE AREA DETERMINATIONS**

Attendance area determinations are calculated using the previous year's October FTE count. Beginning with FY18, ACSS was granted CEP status and ACSS uses the numbers provided by the nutrition department and GaDOE FTE school enrollment numbers to determine rank order of the schools. All the information is entered in the GaDOE worksheet and then used to enter information on the attendance worksheet. These numbers are placed in the attendance area determination worksheet provided by GaDOE and are then rank ordered from highest to lowest percentage free/reduced lunches. PK counts are automatically deducted in the document. Schools are grade span grouped and rank ordered for per pupil allocation calculations, which are highest to lowest per the percentage poverty or in a rank such that a school ranked at a higher poverty receives no less per pupil allocation than the lower ranked per pupil allocation. Revised 3.12.2021

#### **SECTION 9: MAINTENANCE OF EFFORT & EQUITY**

#### **Maintenance of Effort:**

Under Sec. 8521 of ESSA, ACSS may receive funds under a covered program: (Title I, Part A; • Title I, Part A; • Title II, Part A; • Title II, Part A; • Title V, Part B; • Title IX, Part A-McKinney-Vento Act) for any fiscal year only if GaDOE finds that either the combined fiscal effort per student or the aggregate expenditures of ACSS and the State with respect to the provision of free public education by the agency for the preceding fiscal year was not less than 90 percent of the combined fiscal effort or aggregate expenditures for the second preceding fiscal year, subject to the requirements of subsection (b). GaDOE compares the fiscal effort of the preceding year to the second preceding fiscal year and makes the maintenance of effort determination available to the system through a marked "met" or "unmet" on the consolidated application. The Appling County School System consistently meets the MOE requirement. A waiver for maintenance of effort will be submitted as needed. The purpose of this waiver is due to the precipitous decline and the effects of the economic decline on the system's maintenance of effort. The MOE waiver will waive the maintenance of effort requirement should the need arise and demonstrates a lack of maintenance of effort. As of July 2021, no waiver has been submitted for ACSS.

#### **Maintenance of Equity**:

Under section 2004 of the American Rescue Plan Act of 2021 (ARP), MOE requirement has been included to ensure that ACSS safeguard high poverty schools in the district against experiencing a disproportionate reduction in funding in fiscal years FY22 and FY23 and receive a decrease in state funding below the FY19 school year. This requirement must be met as a condition of receiving ARP-ESSER Funds. As of October 2021, ACSS has met MOE. ACSS utilized Title I, Part A rank order, CEP data, and eligible attendance worksheets along CFOs reports on school budgets for MOEs calculations.

#### **SECTION 10: POVERTY COUNTS & RANK ORDER**

Under section 1113(a)(3) of ESEA and 34 C.F.R. 200.78(a)(1), ACSS annually ranks all of the schools in the systems from highest to lowest % poverty counts. The school rankings are based on the percentage of poege6ty children in each school. The same measure of poverty is used to identify eligible school attendance areas and schools, rank each school and determine the allocation of each school.

ACSS has the following options to determine the number of public-school students from low-income families, Section 1113(a)(5)(A) of ESEA:

- Poverty under the Richard B. Russell National School Lunch Act (including free or reduced priced meals (FRM) and Community Eligibility Provision (CEP));
- Families receiving assistance under the State program funded under Title IV, Part A of the Social Security Act (Temporary Assistance for Needy Families);
- Students eligible to receive medical assistance under the Medicaid program;
- Students ages 5-17 in poverty as counted in the most recent LEA-level census poverty data approved by the Department.

ACSS uses the reports from the Nutrition Department and CEP information to rank order the schools in the system. Secondary schools will have the option to use the feeder pattern by applying the average percentage of public-school students from low income families enrolled in the elementary schools that feed into the secondary school to the number of students enrolled in the secondary school. The feeder pattern will have an impact on the rank order of schools.

#### **SECTION 11: ACADEMIC ACHIEVEMENT AWARDS**

Schools receiving Title I Reward School awards are notified by email and are provided the budget amount, if awarded, on the same type budget sheet as the regular Title I budget. Title I principals are also provided the same information from GaDOE that the Federal Programs Director receives regarding use of funds and the required questionnaire. Schools have the options to meet as committees to determine the use of funds; however, the final decision belongs to the principal, who is responsible for the submission of the budget. Schools submit their budgets both in hard copy and electronically to the Federal Programs Director who approves requested expenditures at the district level. If there are questionable submissions, principals are contacted and asked to revise the budget worksheet, which provides the appropriate functions and objects for the allocations the schools choose to use. Each school's allocations, requests, and questionnaires are uploaded through the consolidated application and when approved, schools are notified to begin the purchasing process following the same procedures for all other Federal Programs. Items purchased through Title I must be permanently marked with Title I and the fiscal year the items were purchased. The Federal Programs Director monitors the expenditures by signing off on requisitions, which must be for the items requested on the budget worksheet. Expenditures are also monitored through monthly budget status reports.

## SECTION 12: SCHOOL IMPROVEMENT/CORRECTIVE ACTION/RESTRUCTURING

(Revised 9-19-2022)

The Title I, Part A, Section 1003 School Improvement funds provide financial resources to local educational agencies (LEAs) on behalf of Title I schools identified as Comprehensive Support and Improvement (CSI), Promise, or any school identified as Targeted Support and Improvement (TSI), or Additional Targeted Support and Improvement (ATSI) as defined by Every Student Succeeds Act (ESSA). School improvement funding supports the identified needs outlined in the school's improvement plan.

- Funds are awarded to districts on behalf of the identified schools. Though the LEA acts as the fiscal agent, 1003 funds to support identified school(s).
- Funds are utilized to support goals/priorities identified in the schools' improvement plans.
- Funds must be expended in alignment with the reporting, monitoring, and level of evidence as defined by ESSA.
- Interventions supported with Section 1003 School Improvement funds must be based on strong, moderate, or promising evidence of a statistically significant effect on improving student outcomes or other relevant outcomes, as defined in ESEA section 8101(21)(A)(i).

#### Comprehensive Support and Improvement (CSI) and Promise Schools

- CSI Lowest 5%: the lowest performing 5% of Title I schools in the state when ranked based on their three-year <u>CCRPI</u> average
- CSI Graduation Rate: high schools (Title I or non-Title I) with a four-year adjusted cohort graduation rate less than or equal to 67%
- Promise Schools: the 5.01% to 10% lowest performing Title I schools in the state when ranked based on their three-year CCRPI average

## Targeted Support and Improvement (TSI) Districts and Additional Targeted Support (ATSI) Schools

- TSI Consistently Underperforming Subgroup: all schools that have at least one subgroup that is performing in the lowest 5% of all schools in at least 50% of <u>CCRPI</u> components
- ATSI: among all schools identified for Consistently Underperforming Subgroup, have at least one subgroup that is performing in the lowest 5% of all schools in all <u>CCRPI</u> components.

#### **Funding Requirements**

- Develop a district plan of support for each school identified for comprehensive or targeted support and improvement for which the LEA receives school improvement funds
- Ensure that all identified schools have conducted comprehensive needs assessments to create school improvement plans

- Monitor schools receiving funds under ESEA Section 1003
- Recruit, screen, select, and evaluate any external partners using a rigorous review process
- Align other federal, state, and local resources to carry out the activities supported with school improvement funds
- Modify practices and policies to provide flexibility that enables effective implementation of comprehensive or targeted support and improvement plans, as appropriate
- Engage in ongoing efforts to examine the effects of interventions purchased with 1003 funds.
- Improved student achievement in the target areas and subgroups to be addressed regarding status as a Comprehensive Support and Improvement (CSI) and Targeted Support and Improvement (TSI) school
- Costs directly associated with schools developing required school improvement plans; the school is awarded the funds and the principal with the leadership team will create the budget and justification of expenses with the support of a Georgia Department of Education school effectiveness specialist
- Specific content areas and/or subgroups to be addressed regarding status as a Comprehensive Support and Improvement or Targeted Support and Improvement school and the degree that a direct connection between the budget and the areas of need must be evident
- Instruction or to support instruction
- Personnel services and benefits that are non-recurring, since the funds are for a period of one year

**Funding Allocations** 

Category	Minimum 1003 Allotment
CSI – Lowest 5% or former TSI schools	\$175,000
CSI – Graduation Rate below 67%; only identification	\$100,000
CSI – Alternative Education schools	\$100,000
CSI – Promise Schools – Lowest 5.1%-10%	\$45,000
TSI – Subgroup performing in bottom 5% of at least 50% of CCRPI Components	\$100,000
ATSI – Consistently underperforming subgroup in all CCRPI components	\$125,000
Tier 4 schools will receive supplemental funds	\$25,000
Subgroup Supplement- (October 2021 FTE)	

Supplements will be considered for the percent enrolled of the following subgroups: Economically Disadvantaged. Students with Disabilities, and Limited English Proficient

1%-24%	\$5,000
25%-49%	\$10,000
50%-74%	\$15,000

75%-100%	\$20,000
[/3/0-100/0	\$20,000

#### **Evidence-Based Interventions**

Interventions supported with Section 1003 School Improvement funds must be based on strong, moderate, or promising evidence of a statistically significant effect on improving student outcomes or other relevant outcomes, as defined in ESEA section 8101(21)(A)(i)

#### **Identification of High-Risk Schools:**

Appling County schools follow a continuous school improvement cyclical process intended to set goals, identify ways to improve, and evaluate change. The school improvement process begins with a comprehensive needs assessment and root cause analysis. This systematic process allows for understanding the underlying school and district-based causes of underperformance. Each school works with the district to develop strategies to address the challenges identified in the needs assessment.

School goals are written after completion of the comprehensive needs assessment and root cause analysis. During this process, school improvement team members identify ways to improve and set goals for improvement with actions steps to guide the process.

School administrators, instructional support specialist, and teachers monitor student achievement and student growth on an ongoing basis through both formative and summative assessment. Each quarter school administrators and instructional coaches meet with the district school improvement coordinator to review data and provide an update on goal progression. Schools making progress toward their school improvement goals would continue with their current implementation of evidence-based practices.

In the event that data analysis reveals digression or unexpected results, the administrative team and instructional support specialist work with the school improvement coordinator to determine the root cause(s) of the digression. Based on the findings from the root cause analysis, the team in conjunction with personnel responsible for implementation, research evidence-based practice(s) to determine which evidence-based practice(s) should be implemented to address the root cause. Next, the team determines the best plan of action for implementing the evidence-based practice to ensure that student needs are met in a timely manner. From this point, data analysis would occur on a monthly basis to monitor the effectiveness of the newly implemented practice. Improvement would result in continuation of the evidence-based practice with ongoing monitoring. However, continued digression would suggest the need to revisit the root-cause analysis and the cycle would continue until the true root cause is determined and student needs are met.

**Procedures for Providing Technical** 

## **Assistance to CSI, Promise, TSI, and ATSI Schools**

Test Data Analysis			
Procedure Persons Responsible Timeline			
GaDOE, District and school personnel (the team) meet to analyze school level data and develop root causes as to the designation as a CSI, Promise, TSI, or ATSI school. Student performance data analyzed includes summative and formative data as well as diagnostic data. Key data evaluated includes state mandated assessments and graduation rate.	Federal Programs Director System School Improvement Coordinator Principal Designated School Personnel GaDOE School Improvement Personnel	June	
The team determines specific skills' deficits and areas of need, as measured by the formative and summative data.  The team writes a summary needs assessment for the school.	Federal Programs Director System School Improvement Coordinator Principal GaDOE School Improvement Personnel Federal Programs Director System School Improvement	June July – August	
School personnel use the needs	Coordinator Principal GaDOE School Improvement Personnel Federal Programs Director	October -	
assessment information gleaned through the school level data analysis to make decisions about the use of 1003(a) funds for school improvement. School personnel verify that the 1003(a) budget the school has developed supports activities identified as needs in the needs assessment before submitting it to the District for approval. School personnel submit a copy of their needs assessment to District personnel when they submit the 1003(a) budgets for the District to approve. District personnel verify that the 1003(a)-budget proposed supports needs identified in the school level need assessment before submitted the budget to the GaDOE for approval.	System School Improvement coordinator Principal Designated School Personnel GaDOE School Improvement Personnel	November	

Instructional Strategies & Methods, Professional Learning			
Procedure	Persons Responsible	Timeline	
District & school personnel will attend GaDOE school improvement, Title I, and professional learning staff development workshops.	Federal Programs Director System School Improvement Coordinator Principal Designated School Personnel GaDOE School Improvement Personnel Professional Learning Director	When offered	
GaDOE, and District personnel will provide school site technical assistance to: a) assist the school in analyzing needs and identifying root causes for deficiencies, b) identifying and implementing appropriate instructional strategies and methods of instruction, c) coordinating school improvement plans, Schoolwide plans, and the CLIP, and coordinating and revising budgets so that resources are effectively allocated and more likely to increase student academic achievement.  GaDOE, District & school personnel	Federal Programs Director System School Improvement Coordinator Principal Designated School Personnel GaDOE School Improvement Personnel Professional Learning Director  District Personnel	Beginning in January for the upcoming year On-going  On-going	
will monitor any identified school) implementation of instructional plans takes place through on-site classroom visits using rubrics, and checklists b) Student academic progress is monitored by formative and summative assessments.  Parent and Fa	GaDOE School Improvement Personnel Principal and other school personnel  amily Engagement Requirements	Summative assessments take place at the end of the year	
Procedure	Persons Responsible	Timeline	
District meets with school personnel to provide technical assistance regarding implementing the required Parent and Family Engagement requirements for CSI, Promise, TSI, and ATSI schools. The District shares the following parent participation/ notification chart and sample letters and forms to use to fulfill the requirements. The District explains that the chart will be used by the District to monitor/evaluate that requirements are met.	Federal Programs Director Parent Engagement Coordinator System School Improvement Coordinator Principals Designated School Personnel	June – August	

#### **SECTION 13: SCHOOLWIDE PLAN PROGRAMS**

School improvement plans are required for all Title I schools. These plans are presented, reviewed, and revised annually by school, parents and stakeholders. Plans include the components in the schoolwide program checklist. Suggestions for revision of the schoolwide plan occur at collaborative leadership meetings, which include a discussion of the required components of a schoolwide program.

Agendas, sign-in sheets and minutes are required for any meetings that require any revisions to the plan. Schoolwide program checklists are used to verify that the required components are included in each plan, which include strategies for whole school reform. Correspondence is conducted with principals and/or assigned SIP staff to discuss the current status of their plans in regard to the checklist components.

Five of five schools are eligible for schoolwide programming and maintain that status. There is no consolidation of federal program budgets. (Revised 9-19-2022)

#### The Schoolwide Plan must address the following:

- 1. A comprehensive needs assessment of the entire school which addresses all academic areas and other factors that may affect achievement.
- 2. Schoolwide reform strategies that are scientifically researched based and
  - a. provide opportunities for all children in the school to meet or exceed Georgia's proficient and advanced levels of student performance;
  - b. are based upon effective means of raising student achievement;
  - c. use effective instructional methods that increase the quality and amount of learning time;
  - d. address the needs of all children, particularly targeted populations, and address how the school will determine if such needs have been met and are consistent with improvement plans approved under Educate America Act.
- 3. Instruction by professionally qualified staff.
- 4. Professional development for staff to enable all children in the school to meet performance standards.
- 5. Strategies to increase Parent and Family Engagement.
- 6. Plans for assisting preschool children in the transition from early childhood programs to local elementary school programs.
- 7. Measures to include teachers in the decisions regarding the use of assessment to provide information on, and to improve, the performance of individual students and overall instructional programs.
- 8. Coordination and integration of Federal, State, and local services and programs to include
  - a. list of state and local educational agency programs and other Federal programs that will be included;
  - b. description of how resources from Title I and other sources will be used;
  - c. plan developed in coordination with other programs, including those under School-to-Work Opportunities Act of 1994, the Carl D. Perkins Vocational

and Applied Technology Act, and National and Community Service Act of 1990.

- 9. Activities to ensure that students who experience difficulty mastering standards shall be provided with effective, timely assistance, which shall include:
  - a. Measures to ensure that students' difficulties are identified on a timely basis;
  - b. Periodic training for teachers in the identification of difficulties and appropriate assistance for identified difficulties; Teacher-parent conferences that detail what the school will do to help the student, what the parents can do to help the student, and additional assistance available to the student at the school or in the community.
- 10. Description of how individual student assessment results and interpretation will be provided to parents.
- 11. Provisions for the collection and disaggregation of data on the achievement and assessment results of students.
- 12. Provisions for seeking statistically sound results for each category for which assessment results are disaggregated.
- 13. Provisions for public reporting of disaggregated data.
- 14. Plan developed during a one year period, unless LEA, after considering the recommendation of its technical assistance providers, determines that less time is needed to develop and implement the schoolwide program.
- 15. Plan developed with the involvement of the community to be served and individuals who will carry out the plan including teachers, principals, other school staff, and pupil service personnel, parents and students (if secondary).
- 16. Plan available to the LEA, parents, and the public.
- 17. Plan translated to the extent feasible, into any language that a significant percentage of the parents of participating students in the school speak as their primary language.
- 18. Plan is subject to the school improvement provision of Section 1116.

#### **Evidence Based Interventions (Revised 10/4/2022)**

ACSS follows the definition of "evidence-based" as giving in section 8101(21) of ESEA.

EVIDENCE-BASED. — (A) IN GENERAL. —Except as provided in subparagraph (B), the term 'evidence-based', when used with respect to a State, local educational agency, or school activity, means an activity, strategy, or intervention that—

- I. demonstrates a statistically significant effect on improving student outcomes or other relevant outcomes based on
  - a. strong evidence from at least 1 well-designed and well- implemented experimental study;
  - b. moderate evidence from at least 1 well-designed and well-implemented quasiexperimental study; or
  - c. promising evidence from at least 1 well-designed and well-implemented correlational study with statistical controls for selection bias; or
  - d. demonstrates a rationale based on high-quality research findings or positive evaluation that such activity, strategy, or intervention is likely to

improve student outcomes or other relevant outcomes; and includes ongoing efforts to examine the effects of such activity, strategy, or intervention.

# ACSS procedures that describe how support is provided to schools in developing, revising, implementing and coordinating schoolwide and school improvement plans:

The Title I Department is responsible for ACSS Assurances.

- To ensure compliance with federal and state guidelines, the Title I Department organizes Peer Review teams that include Parent and family engagement Specialists, all Federal Programs Directors/Coordinators to review Schoolwide plans.
- Extensive technical assistance is provided to schools throughout the year by all Federal Programs Directors/Coordinators in relation to monitoring and evaluating the school plans.
- Participants are provided in-service by the Federal Programs Directors/Coordinators on Compliance on the 18 Title I components and how those components should be addressed within the plans.
- Each plan is reviewed by the appointed personnel.
- Once reviewed, the plans are returned to schools for revisions based on the suggestions and findings of the reviewer.
- The school then re-submits the plans with completed edits and the plans are reviewed a second time for verification that suggestions and findings have been adequately addressed.
- ACSS provides on-going technical assistance to schools identified as needing improvement.

#### **Monitoring and Oversight of School Improvement**

All schools within the Appling County School System conduct Schoolwide Programs. This allows all children and all parents an opportunity to have equal access to all related Title I assistance. ACSS will utilize district members of the school system to build capacity and support the school improvement process in schools identified as needing comprehensive or targeted support interventions as required by GaDOE. All schools identified as needing comprehensive or targeted support interventions within the APPLING will be involved in school improvement efforts through the work of the LEA, RESA, and GaDOE. Members of the system Teaching & Learning Department will work with these schools to implement practices that have proven effective with improving schools. Members of the Teaching & Learning Department, along with the GaDOE, will establish clear expectations for personnel as they systematically support continuous improvement in all schools. However, more intensive support will be provided by APPLING and GaDOE School Improvement Specialists in any schools within the Appling County School System that are designated as needing comprehensive or targeted support interventions. The Federal Programs Director will conduct a yearly evaluation of school improvement efforts for all Title I schools using the Appling County School System Monitoring Form. School Improvement Specialist will conduct impact checks to determine the extent to which

school improvement plans have been implemented. These checks will occur in and January/February each school year. Review Approval School Improvement/Schoolwide Plans School Improvement/Schoolwide Plans are updated each summer for the following school year. Each school leadership team updates the plans using representatives from each grade level, content area, and department, as well as district and school administration and parents. During school leadership meetings, instructional strategies, parental involvement initiatives, and professional development activities are planned after a careful analysis of various data. Assistance is provided to schools identified as needing comprehensive or targeted support interventions in the use of school improvement funds to accomplish initiatives in their school improvement and schoolwide plans. All school improvement plans must be signed off as completed by the system Federal Programs Director and the Superintendent. The Professional Learning Plan for each school must have final approval by the Federal Programs Director. It is through this process that the APPLING oversees the development of school improvement and schoolwide plans.

Professional Development, Analyzing Data, Technical Support and Assistance Federal Program Directors support schools in developing, revising, implementing and coordinating school improvement and schoolwide plans during regularly scheduled meetings of administrators and instructional coaches. During the meetings, data is analyzed to identify and develop solutions to challenges related to instructional strategies, parent involvement, professional learning, and budgets. Each school, including those that may be identified as needing comprehensive or targeted support interventions, must submit a school-based plan for professional development to be reviewed and approved after recommendations by Federal Programs Directors. Plans are due each August and must generally be approved by the end of September.

SECTION 14: Comprehensive Support and Improvement (CSI), Comprehensive Support and Improvement Promise (CSI Promise), Targeted Support and Improvement (TSI)

The Appling County School System has no CSI, CSI Promise, or TSI schools.

## SECTION 15: Public School Choice – GA INTRADISTRICT TRANSFER OPTION

In November, 2011, the Georgia Department of Education (GaDOE) submitted to the U.S. Department of Education (US ED) an application requesting flexibility through waivers of the Elementary and Secondary Education Act of 1965 (ESEA) requirements and their associated, regulatory, administrative and reporting requirements. One of the requested waivers directly affected Public School Choice (Choice). Beginning in the 2012-2013 school year those Title I schools that were required to offer Public School Choice (Choice) due to a NCLB school improvement status, the waiver allows those Title I schools to no

longer be required to offer Choice under ESSA but rather follow Georgia's Intradistrict Transfer option.

Georgia's Intradistrict Transfer (O.C.G.A. §20-2-2130, O.C.G.A. §20-2-2131) option allows parents of students enrolled in a public elementary or secondary school in Georgia to elect to enroll their student in a public school that is located within the school district in which the student resides other than the one to which the student has been assigned by the local board of education if such school has classroom space available after its assigned students have been enrolled. The parent shall assume the responsibility and cost of transportation of the student to and from the school.

- Principals will review applications and deny or approve each request. This will be based on classroom space available, projected enrollment, maximum class size, and available teachers.
- 2. In the event a particular school has available space and the district determines that the number of transfer requests exceeds the remaining available classroom space, the district will conduct a random lottery that provides each interested student with an equal chance to have their transfer request met.

A district can deny a transfer request for any of the following reasons:

- Available classroom space of the school building based on established health and safety provisions;
- Class-size by grade and subject, based on state law and rule;
- For students with disabilities (SWD) whose Individualized Educational Plan (IEP) or Individualized Accommodation Plan (IAP) specifies services only offered at a specific school(s) in the district;

Appling County School System will apply these same rules to students enrolled in PK.

#### **SECTION 16: RECORDS RETENTION**

ACSS is required to maintain records in accordance with the 2 C.F.R. Part 200 – Uniform Administrative Requirements, Cost Principles and audit Requirements for Federal Awards.

In addition to keeping records to show that full compliance with federal program requirements were met, ACSS will comply with local records retention policies (The Georgia Archives Records and Information Management Services-Retention Schedules for Local Government Records) and shall keep the following records:

- The amount of funds:
- How funds were used:
- Total cost of the project;
- Share of the cost provided from other sources; and
- Other records to facilitate an effective audit.

In the ACSS, all federal program records, supporting documents, statistical records, and all other records pertinent to program regulations on the grant award will be retained for the current fiscal year end, plus five years, for a total of six years.

NOTE: The Federal Freedom of Information Act (5 U.S.C. 552) does not apply to records unless required by federal, state, or local law; grantees and subgrantees are not required to permit public access to their records. (Approved by the Office of Management and Budget under control number 1880- 0517) (Authority: 20 U.S.C. 3474; Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards [2 C.F.R Part 200], [53 FR 8071 and 8087, Mar. 11, 1988, as amended at 53 FR 8072, Mar. 11, 1988; 53 FR 49143, Dec. 6, 1988; 64 FR 50392, Sept. 16, 1999])

## **SECTION 17: COMPARABILITY**

To ensure that funds made available under ESSA (Sec. 1118(c)) are used to provide services that are in addition to the regular services normally provided by ACSS for participating children, ACSS must provide comparable services in its Title I schools with state and local funds. This requirement ensures that the federal investment has an impact on the at-risk students the program is designed to serve—something that would not occur if federal dollars replaced state and local resources that would otherwise be made available to these at-risk students. At the school building level, comparability requires ACSS to ensure that each Title I school receives its fair share of resources from state and local funds. In other words, ACSS may not discriminate (either intentionally or unintentionally) against its Title I schools when distributing resources funded from state and local sources simply because these schools receive federal funds. Comparability is achieved through the use of two forms of documentation: the October FTE count and the CPI report obtained from the CFO. The state comparability report form provided by the GaDOE is used to report the appropriate numbers to GaDOE. The total number of nonfederal employees that are to be included per payroll distribution codes are counted and placed in the comparability report also provided by Title I, which automatically calculates comparability. The enrollment numbers submitted for comparability are from the October FTE count with the exclusion of prekindergarten enrollment. Since all schools in ACSS are Title I schools, ACSS computes the average student/instructional staff ratio for all its schools and consider a school comparable if the student/instruction staff ration falls within 85 to 115% of the average for all schools within the grade span, the schools would be considered comparable. Included in the count are instructional teachers and support personnel, instructional paraprofessionals, music, art, and physical education teachers, guidance counselors, speech therapists, media specialists, school social workers and psychologists. No federally funded personnel or prekindergarten personnel are included in the count; only state and local paid staffs are counted. If ACSS shows to not be comparable in the initial run of the baseline data supplied via State supplied data, ACSS has the opportunity to work with the Title IA Program Specialist to adjust the current data to correct data entries found to be inaccurate. Once documentation is provided to support the requested changes, the data entries can be adjusted in the "self-reported" section of the application by the designated Education Program Specialist and the comparability calculations re-run. This process is repeated until comparability is met. If comparability is still not met, ACSS will either utilize their Resource Allocation Methodology/Plan to demonstrate all of their schools were equitably funded with State and local funding in order to demonstrate comparability or return the requisite amount of non-federal funds to compensate for the number of instructional personnel missing to meet compliance with comparability.

#### **Comparability Timeline for ACSS by the Federal Programs Director:**

ACSS must be comparable by July 1 of each fiscal year. Adjustments deadline December 31st.

#### January - April

 Review district level budget (State and local funds), staff assignments, equipment, and material for the purpose of ensuring compliance with Title IA comparability requirements

#### May-July

o Collaborate with HR, CFO, to discuss Comparability Report

#### **August**

- · Collect district-wide school staffing report from HR
- Compare list of Title IA funded staff as reflected on the School Allocation page to the Title IA funded staff as reported by Human Resources
- Collaborate with CFO on Title IA funded staff list and CPI report.

#### September

- Run preliminary report
- Run comparability using <u>Comparability Worksheets</u>
- Advise Superintendent of any corrections immediately for all schools that are shown to be non- comparable

#### October

 Collect the necessary data to demonstrate comparability as of the October full- time equivalent (FTE) count day

#### **December**

Submit Title IA Comparability Report via the online comparability application in the ConApp when notified by GaDOE.

# <u>SECTION 18: Fiscal Requirements for Federal Programs</u> <u>Internal Controls, Budget Management, Fiscal Requirements</u>

#### Financial Management

Appling County School System has established and maintains effective internal control over federal awards and provides reasonable assurance that all federal funds are managed in a way that is compliant with the Uniform Administrative Requirement, Cost Principals and Audit Requirements as per (2 C.F.R §200). The multi-level internal controls ensure transparency and fiscal responsibility throughout the entire transaction process that takes place on a daily basis in the school system in order to reduce fraud, waste and abuse in the use of Federal funds. ACSS does not use federal award funds to pay sub-recipients to carry out any educational programs in the district.

Integrity of any cash management activity depends on the application of internal control principles and standards that are carried out by ACSS. In order to ensure that all equipment and supplies are purchased, received, and paid during the period of performance (27 months) of the grant, ACSS follows a set of procedures in accordance to 2 CFR 200.77.

The following identifies the monitoring and reimbursements process by the Appling County School System:

Procedures	Persons Responsible	Timeline
The district's CFO ensures procedures are followed to adequately handle the cash management § 200.302(b) (6) & § 200.302 of the federal funds through the PC Genesis accounting system.	CFO and Federal Program Directors/Coordinators	Ongoing
Beginning in FY23: Federal Program Directors develops the budget based on each program's requirements and allowable cost. Budgets are reviewed by the district's team. The reviewed budget is reviewed/approved/rejected by the GaDOE Program Specialist. Approved budget is sent to ACSS. Superintendent approves/rejects and signoff. Grants accounting loads approved budget into GAORS. ACSS approved budgets are provided to CFO. Revised 9.13.2022	Federal Program Directors  Assistant Superintendent Superintendent CFO	Ongoing
CFO and Federal Program Directors make sure that all appropriate information concerning the program's expenditures is obtained before completing a request for funds from GaDOE by reviewing reports provided by CFO, monthly, quarterly, or as requested by Federal Programs Directors.	Federal Program Director CFO	Ongoing

The CFO reviews the expenditures incurred and the forecasted expenditures then compares them to the cash on hand for the Title I and other federal programs. Then CFO and Federal Program Directors determines the amount of the drawdown (non-cash) needed from GaDOE. 200.305 Funds that are transferred to Title I, Part A – Title II, Part A and Title IV, Part A and any carryover are spent and drawdown first.  CFO reviews along with the, Federal Program Directors/Coordinators and submits the request for funds from GaDOE via the Grants Accounting Online Reporting System.	CFO and Federal Program Directors/Coordinators	ongoing
Evaluation of the ACSS's cash management activities and identification of problems or weaknesses in internal controls.	CFO and Federal Program Directors/Coordinators	ongoing
Federal Program Directors/Coordinators ensures that cash related transactions occur only after the approval of an individual with delegated authority to make approvals.  Transactions are being fully documented so that an undisputable audit trail exists. All transactions are recorded promptly during each step of the handling function.	CFO and Federal Program Directors/Coordinators	ongoing
Reimbursements are made only after the costs have been incurred with the proper documentations and approval signatures. All drawdowns are reviewed and authorized by both CFO and Federal Program Directors/Coordinators and for only equipment and supplies received during the period of performance (27 months) of the grant award. Appling County will be limited to one drawdown each month (15 payments for federal grants) during the grant period. Appling County understands that GaDOE cannot guarantee the timing and amount of the advance payments. All disbursements from GaDOE to Appling County will be reimbursement for all allowable incurred Federal program expenditures.		
Provisions are made for the regular review and comparison of transaction documentation to detect errors and duplicate payments.	CFO and Federal Program Directors/Coordinators	ongoing

Duties related to maintenance of accounts receivable, accounting, disbursing, and collecting funds are segregated.	CFO and Federal Program Directors/Coordinators	ongoing
Drawdowns are requested once minimal time is designated for quality control to ensure that expenditures are recorded, invoices are received and checks have cleared.  Time Line for quarterly reports and drawdowns (are dependent on GaDOE release of funds, budget approvals, and personnel present at work due to COVID-19)  1. October  2. January  3. April  4. July  5. September – Final Completion Report		
Carryover funds are requested for approval. Based on the Flex-Ed waiver, ACSS – Title IA was granted the excess of 15% of carryover for FY21, FY22 & FY23.		
The drawdown request is then made that equals the expenditure printout. Expenditure report and DE0147 is filed for justification of funds.		
Once books are closed the district runs a report to determine the funds expended for the month from fund source 402.		
At year end, reconciliation for GAORS grants, a report is printed from CFO, Federal Program Directors/Coordinators reviews and signs off that the completion report can be entered and then submitted to GaDOE. The original is kept on file for documentation purposes.		
The drawdowns request form is completed every time drawdowns are requested from GaDOE. It is signed by both, CFO and Federal Programs Director/Coordinator. It includes the amounts, dates, and Federal Program. Forms are kept by each		

Federal Program Department for monitoring and auditing purposes.	
The following statement will be attached and signed to the DE0147: By signing this report, I certify to the best of my knowledge and belief that the report is true, complete and accurate and the expenditures, disbursements and cash receipts are for the purposes and objectives set forth in the terms and conditions of the federal award. I am aware that any false, fictitious, or fraudulent information or the omission of any material fact, may subject me to criminal civil or administrative penalties for fraud, false statements, false claims, or otherwise.	

#### Appling County Board of Education

Scarlett Miles Copeland, Ed.D. Superintendent Scarlett.copeland@appling.k12.gu.us



249 Blackshear Highway Baxley, Georgia 31513 Phone (912) 367-8600 Fax (912) 367-1011

## INTERNAL CONTROLS:

Expenditure report has been reviewed and is	s correct.
Request for federal funds have been evalua immediate needs.	ted and drawdowns of federal funds are only for
Drawdowns are being requested for expense	es already paid.
The drawdown request equals less than the	expenditure report.
We are requesting for the drawdown to be the amour	ut of
\$as of	
receipts are for the purposes and objective the federal award. I am aware that any fals the omission of any material fact, may sub penalties for fraud, false statements, false cl	se, fictitious, or fraudulent information or ject me to criminal civil or administrative
Federal Program	Adrianne Taylor, CFO
Norma N. Cortes, Title I Director	Date
Attachments:Expenditure Report	
DE0147 Request for Reimbursement	

The following internal controls are established, evaluated, and monitored by Federal Program Directors/Coordinators for assurance that the federal funds are managed in way that is compliant with federal statutes, regulations and the conditions of the federal award:

# **Program Implementation and Compliance Process Personnel:**

Federal funds expended on personnel can be monitored separately through payroll. Periodic certifications for all programs verify that duties are consistent with the position. Periodic certifications are collected twice yearly (January and the last day of contract or July as appropriate for personnel according to contract days) for those staff members who are paid 100% with Federal funds. Split funded personnel submit monthly time logs that document the amount of time spent in Federal Program and non-Federal Program duties. CARES/ESSER Funds: Employees may receive hazard pay for a national or local emergency or to perform critical services. Instances when this might happen may include a pandemic or a natural disaster. Employees will be compensated for fully completing an objective from a supervisor related to the aforementioned conditions. During COVID, if an employee was required to complete critical services at the workplace, hazard pay was issued for time worked during the national emergency. The retention bonus was paid to any staff who was employed at the time of payment. Revised 11/29/2021

DEPARTMENT OF EXECUTES  OR OR OTHER OF THE OTHER OF THE OTHER O	CARES Act, CRRSA, ARP Act Periodic Certification Form (Staff working solely on one federal cost objective)	
	loyees listed below worked solely on: (Cost Objective, i.e. CARES, CRI	
This form must be signork performed by the	gned by a supervisory official having first-hand knowledge o ne employees listed below.	f the
Name of Employee		$\neg$
1.		
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14.		
15.		_
16.		_
Supervisor (Print I	Name)	
Supervisor Signat	ure	$\dashv$
Date		-
Reference 2 C.F.R. Part 200 (§20	(0.430)	
	Georgia Department of Education July 1, 2019 • Page 1 of 1	

## **Periodic Certification for Time and Effort:**

Federal law requires all employees, including administrators, teachers, paraprofessionals and other support staff, who are paid with federal funds to document the time and effort spent within the program. Fully-funded federal personnel must submit an assurance

(Semi-Annual Certification/Periodic Certification Form) twice yearly documenting that they spent 100% of their time on the federal program's related activities. Federal Program Directors and assigned Administrative Assistants in the board office will:

- Collect periodic certification forms for all 100% Title I, School Improvement, IDEA, and CARES, CRRSA, ARP Act funded personnel for their assigned group of schools.
- Monitor implementation of the written procedures for periodic certification forms.
- Provide the designated Federal Program Director with the original Semi-Annual Certification/ Periodic Certification form and maintain a copy for their file.
- Maintain a file of all forms collected semi-annually/Periodic Certification in the Office of the Federal Program Director/Coordinator.
- Collect Periodic Certification forms semi-annually, at the end of the first semester, (December) and at the end of the second semester (May-June).
- Monitor all Periodic Certification dates and signature dates for consistency and accuracy. These must be completed after the fact, must account for the total activities performed, and must be signed by employee or supervisor.
- Conduct school visits to verify that duties performed by Title I, School Improvement, IDEA, and CARES, CRRSA, ARP Act paid personnel are consistent with the job title listed on the Periodic Certification form.

#### **Collection Process**

- Periodic certification forms should be completed for all full-time district personnel that are paid 100% with federal funds at each school and district office. These forms are collected semi-annually, once per semester, and must be signed by the supervisor having firsthand knowledge of the work performed by the employee.
- The Federal Programs Directors managing the different grants will be responsible for the collection of Time and Effort Documentation. These positions include but are not limited to:

Personnel	Program
Instructional Support Specialist	Title I
Paraprofessional	Title I/IDEA
Parent and family engagement	Title I
Coordinator	
Central Office	Title I
SPED Administrative Assistant	IDEA
SPED Parent Mentor	IDEA
ACBOE Personnel	CARES, CRRSA, ARP Act

#### **Monitoring Process**

All Federal Program Directors using Federal Funds to pay salaries monitor the completion and collection of Title I Periodic Certification forms. Each Federal Program Director is responsible for overseeing the timely collection and review of the certification forms for their assigned group of schools and/or central office staff. The monitoring process includes the following responsibilities:

- Collecting and reviewing the Periodic Certification Forms for assigned schools or department.
- Verifying the accuracy of information by matching staff names and positions with the school's and district federal budget.
- Working with schools and/or Human Resources to correct any discrepancies in staffing information and to verify professionally qualified status.
- Collaboratively working with schools to monitor and confirm that federally funded staff members are performing duties consistent with federal guidelines.

#### References

EDGAR (2 C.F.R. PART 200) Where employees are expected to work solely on a single Federal award or cost objective, charges for their salaries and wages will be supported by periodic certifications that the employees worked solely on that program for the period covered by the certification. These certifications will be prepared at least semi-annually and will be signed by the employee or supervisory official having first-hand knowledge of the work performed by the employee

#### **Permanent Schedules:**

A permanent schedule is required to be submitted along with periodic certifications of teachers or paraprofessionals who are being paid with federal funds. Teacher schedules and paraprofessional schedules (showing paraprofessionals are under the direct supervision of a professionally qualified teacher see Appendix C for Title I Paraprofessionals - Non-Regulatory Guidance) are submitted twice a year.

## **Time Sheets:**

A time sheet is completed by individuals providing additional or contracted services. The sheet is approved and signed by the principal and Federal Program Director/Coordinator who forwards it to accounts payable or payroll for payment. The completed expenditure packet is then forwarded to the finance director who verifies all appropriate documentation and approval have been submitted. Corrective Action to time sheets was made on August 15, 2018 via email to all district personnel to ensure that time sheets were verified by personnel in charge of grants in order to ensure program compliance.

## Time Logs:

Individuals who are paid less than 100% from federal funds and whose schedule changes from day to day complete and submit a monthly time log depicting the amount of time spent on Federal Programs duties matched, at minimum, the portion of their salary funded through Federal Funds. Monthly time logs are collected from split-funded personnel. These personnel are instructed to monitor their own time throughout the month and the

Federal Program Director/Coordinator approves the monthly time log via a signature and date. Central office personnel submit time logs to the Federal Program Director/Coordinator.

**After the Fact Distribution:** Requirements for activity reporting meet the following requirements:

- (a) Reflect after-the-fact distribution of the actual activity of the employee;
- (b) Account for the total activity for which each employee is compensated;
- (c) Be prepared at least monthly and must coincide with one or more pay periods
- (d) Be signed by the employee.
- (e) Additionally, reasonable approximations/distribution percentages are determined before the services are performed and are compared to actual costs regularly and revised, if necessary.

## Payroll:

After the September payroll has posted, the Federal Program Director/Coordinator has a report pulled that shows the name of the personnel paid with federal funds. This report should match the federal funds personnel names submitted on the budget sheet by the principal. If the names do not match, an investigation occurs and the matter is resolved, if necessary, through journal entries or payroll transfers. The payroll report is pulled and checked several times throughout the year. At the beginning of the year, teachers are asked if they will complete a degree upgrade during the year. Budgets are built around the anticipated upgrade.

#### STIPENDS:

ACSS Board Policy GAD follows Georgia Rule 160-3-3-.04. Federal Programs Directors/Coordinators pre-approve all professional learning, staff attending, dates and times required according to SIP, CLIP, Equity Plan and Professional Learning, identified needs through the school year.

#### Stipends may be awarded only if the following conditions exist:

There is evidence that the knowledge, skills, practices, and dispositions gained from the professional learning activity are aligned to an approved individual plan, or a school or LEA initiative and/or product, and/or specific goals; and

There is evidence that the knowledge, skills, practices, and dispositions developed through participation in, or facilitation of professional learning have been implemented/demonstrated in the classroom/work setting; and

Participation occurs beyond regular contract hours, days, or school year.

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

All participants must work a 4-hr. day for ½ day stipend or 7.5 hr. day for a whole day stipend AND complete the established purpose/objectives of evidence-based instructional training activity.

All attendants must follow the following Procedure:

- 1. Participants must sign-in.
- 2. Agenda must include pre-approval of professional development
- 3. Be present from start to end.
- 4. Members Present & Active Role in meeting

Following the completion of the professional development sessions, the excel spreadsheet that lists the names of all participants to receive stipends is reviewed by the Federal Program Director who approved the PL and is turned in to AP for payments.

State and federal funds designated for professional learning shall not be used to pay stipends to school board members or to school council members who are not employed by ACSS. 11.4.2022

## Mandatory Disclosures: 200.113

<u>All employees must disclose in writing</u> all violations of Federal criminal law involving fraud, bribery, or gratuity violations potentially affecting all Federal awards.

#### Tracking Personnel Expenses:

- All employees maintain documentation showing that their salaries are allocable to a federal program, which is approved and verified by immediate supervisor. 200.403(a)
- Documentation is based on records that accurately reflect the work performed and are verified by immediate supervisor.
- ACSS complies with 200.430(i) (2) DOL regulations for Fair Labor Standards
  Act and ensures that payments to employees are made and supported by
  records indicating the total number of hours worked each day).

## Other Expenditures:

Other funds are for allowable expenditures and are expended through the following process:

- 1. Schools develop budgets with the Federal Programs Director and Program Directors
- 2. Allowable items are approved or revisions are requested by Federal Programs Director and other Federal Programs Directors.
- 3. After revisions have been made, the Federal Programs Director and other Federal Programs Directors approves school budgets and other grant budgets, prepares set asides budgets if applicable as per guidelines
- 4. The budget is uploaded in to consolidated application

- 5. Approval is obtained on-line, within a week, totals will be provided to CFO to upload to PC Genesis and will be reviewed during budget detail analysis to ensure accuracy and identify errors.
- 6. Schools are notified of the budget approval and to submit purchase orders based on their plans.
- 7. Requisitions are made at both, the school and district levels
- 8. The appropriate federal program coordinator reviews the requisition to assure that the purchase is included in the Schoolwide/School Improvement Plan/Equity Plan and that the expense is allocable, reasonable, and necessary.
- 9. If approved, the program coordinator then signs off on the requisition which forwards the requisition to the accounts payable office for conversion to a purchase order using the financial software program.
- If rejected, the federal program director contacts the school or program for additional information or returns request back to the school with a reason for rejecting the request.
- 11. Superintendent or assignee signs off on all purchase orders.
- 12. As items are received at schools/district, officer managers sign off and return packing and invoices to the Title I and Federal Programs Directors, who signs and sends to the Superintendent and then to accounts payable who makes payment. (See requisition process)
- 13. All purchase orders, budgets and expenditures are compared to check for errors. Any errors are corrected as needed and identified.

# Purchase Order Process when ordering school supplies from the CARES Act – ESSER Funds:

- 1) Process your requisition...just like you would do for any other purchase you would make for supplies, books, etc. (you cannot order from Amazon, Walmart, Lowes...anyone that does not accept purchase orders...we cannot do a credit card or check) Have your principal sign as normal.
- 2) Send only the CARES Act ESSER requisitions to the office of the administrative assistant of the Assistant Superintendent for logging, coding and approval, and to assign a purchase order number.
- 3) Administrative assistant will send back to a designee at your school of your choice for ordering.
- 4) All items should be shipped to your school address. When materials arrive, items will need to checked off, packing slip signed, and attached to requisition form/purchase order. After invoice arrives, attach to the requisition form and principal will need to sign invoice. Then send all paperwork back to Administrative assistant for payment.
- 5) Please make you a copy of all you send for your records. Revised 5.5.21

# All federal expenditures are compiled, reviewed and approved by Federal Program Directors and cover the following:

Allowable participants and activities as outlined in the federal/state award as per CFR §200.403(b)

1. Conference participation cost are appropriate, necessary and managed in a manner that minimizes cost to the federal award

- 2. Allowable advertisement related to the recruitment of personnel required by the LEA.
- 3. Travel charges that reasonable and consistent with the written travel policies.
- 4. Requires Pre-Approval (for allow ability of participant and activity)
- 5. Per Diem, lodging, mileage must be paid out of pocket and are reimbursed at cost, no higher than state per diem with the provision of actual receipts must show date and time. At times when Federal Programs Directors reserves rooms and conferences for staff, direct BOE checks are used to pay for the entire staff. Staff are required to provide evidence of attendance when Federal Program is not present or attending such conference.
- 6. Any cost exceeding state per diem, must be preapproved by Federal Program Director and will require written explanation.
- 7. Memberships that in compliance with governing laws and regulations.
- 8. Supplies that reasonable and necessary to the performance of grant activities.
- 9. Stipends consistent with federal, nonfederal, and district policy and state board rule. Georgia Rule 160-3-3-.04
- 10. All expenditures are supplemental.
- 11. All expenditures align with program purposes and ACSS priorities outlined in the CLIP.
- 12. Those items that documentation can support its accountability of the federal grant.
- 13. Obligations and expenditures that take place during the period of performance (27 months).

#### **Travel Reimbursements:**

Travel reimbursements for ACSS employees are Reimbursement of professional travel expenses cannot be made unless an employee expense statement is completed for each individual in accordance with state regulations and ACSS's reimbursement policy. Incomplete forms will be returned.

Expense Statement-The expense statement must be completed in full. Employee is responsible for getting principal's signature on the form prior to sending it to the board office for reimbursement. All reimbursement for professional development <u>must</u> have an <u>agenda</u> attached for each day of attendance. By signing the travel reimbursement form, employee is attesting that all information is not only accurate, but also complies with all travel rules and regulations. *Travel forms should be submitted to appropriate Program Director at the BOE within seven days of the last date of travel, if additional approval is needed, the form will be forwarded to the appropriate administrator.* 

Mileage - Mileage is reimbursed at \$0.625 cents. The mileage rate is set by the state and is subject to change. Personal miles driven while out of town should not be reported. ACBOE requires traveling four to a vehicle when logistically possible.

Hotel Fees - Hotel receipts must be submitted with expense statement when overnight travel is involved. Advance reservation is encouraged well in advance of the conference, obtaining a confirmation number for reference. Accommodations at conference location are encouraged (usually a conference discount is provided). If the conference site is full, lowest rate is recommended. The hotel should be given two different tax forms upon arrival. Most hotels will remove the sales tax; some will remove the occupancy tax. ACBOE requires double occupancy for lodging when logistically possible. The responsible Program Director will make the reservations when 3 or more rooms are needed.

Additional Expenses - Additional (unapproved) expenses are limited to parking. Any other "additional" cost must have prior approval from the appropriate principal, director, or superintendent.

Meals - Meal reimbursements are based on the actual expenditures up to the maximum allowable amount. Attach meal receipts.

Travelers traveling within the State of Georgia are eligible for up to \$50.00 per diem to cover the cost of three (3) meals per day. Incidental are not included in the daily per diem rate. The \$50.00 per diem rate applies to all cities in Georgia. Employees traveling overnight within the State of Georgia or "In State" will not receive 100% reimbursement on the first and last day travel less any provided meals).

<u>Standard rate:</u> Breakfast \$13.00 Lunch \$14.00 Dinner \$23.00 <u>High cost rates – Eliminated.</u>

#### **Overnight Travel Meals**

If departing for an overnight trip before 6:30 a.m., reimbursement for breakfast on the day of departure will be made. Employees returning from an overnight trip after 7:30 p.m., will be reimbursed for dinner.

If hotel offers continental breakfast, employee will not be reimbursed for breakfast. <u>Do not put this on the expense form.</u>

If the workshop/conference includes any meals, employee will not be reimbursed for those meals even if employee choose to eat elsewhere. Do not include these meals on the expense form.

#### Daily Travel Meals

Breakfast and lunch can be reimbursed when no overnight travel occurs only if employee is more than 30 miles from work location, and travel begins before 6:30 a.m., and employee is away for more than 13 hours. If departing prior to 5:30 a.m., employee may be reimbursed for breakfast (only if traveling more than 30 miles from work site location) regardless of the length of time employee is away.

#### **Important Information**

Per IRS regulations, employee must adequately account for reimbursable expenses within 60 days. After 60 days, reimbursement will be included in the payroll process & expenses will be reported as taxable income in employee's W-2. (Revised 2.7.2022)

Completed travel reimbursement requests are processed as follows:

- Employee completes the travel expense statement
- Employee secures signatures
- Employee uploads the travel expense statement and documentation and/or receipts to the YOSS Platform
- Travel expense statement is submitted to BOE/Department/Administrative Assistant
- Administrative Assistant reviews for accuracy, codes it, and submits to Federal Program Director/Coordinator
- Federal Program Director/Coordinators reviews for accuracy, submits to Account Payable
- Accounts Payable submits to Superintendent for approval and submits back to Accounts Payable
- Accounts Payable downloads approval and uploads to PC Genesis where a purchase order is created
- Federal Programs Department are notified by YOSS of available Purchase Order has been created. An invoice is created and submitted to Federal Programs Director/Coordinator for approval
- Federal Program Director/Coordinator submits to Accounts Payable where checks are cut on the 1st and 15th of each month

#### Segregation of Duties:

Segregation of duties takes place throughout the entire program management process in order to prevent errors and fraud. All personnel in the district have an immediate supervisor who oversees the entire process management of the funds. At least two signatures are required for all purchase order request, purchases, verifications of purchases, payment of purchases, drawdowns, time sheets, split funded, forms, schedules, and any financial transaction. Chain of command is the format used in the district to show the segregation of duties and immediate supervisor. Directors oversee coordinators, and administrative assistants. Superintendent oversees all personnel and sign-off on all transactions.

#### **Purchasing Procedures**

The following are the ACSS purchase procedures as per board policy DJE:

It is the intention of the Board of Education that the School District purchase equipment, supplies and other materials that best meet the needs of the District at the most economical cost. Generally, a competitive process should be followed for each purchase based on procedures to be determined by the Superintendent. The Superintendent or his/her designee shall have the authority to issue regulations, invitations to bid, requests for proposals, or other procedures governing this process

where there exists no specific state law or State Board rule which must be followed. In addition to price, the procedures established by the Superintendent may consider performance of the vendor with the School District, performance of the vendor with other customers, the convenience of the vendor to the District including whether the vendor is a local business, other benefits offered by the vendor or any other factor which may make the acceptance of a particular proposal from a particular vendor in the best interest of the School District.

The Superintendent or his/her designee is authorized to approve any and all purchases of less than \$10,000. For any purchase in excess of that amount, the Superintendent shall provide to the Board of Education written documentation of the competitive process used and the proposals, bids or offers received in response to that process.

At all times, the Superintendent shall follow any mandated processes required by federal and state law, set forth in State Board of Education rules or procedures or regulations of the State Department of Education. Documentation including bids shall be retained for the length of time specified in the records retention schedule.

#### **Procurement and Suspension and Debarment**

The Appling County Board of Education does hereby adopt 2 CFR 200.317 through 200.327; 2 CFR 200.318(a). Uniform Administrative Requirements, Cost Principles, and Audit Requirement for Federal Awards by following these procedures:

- All purchases will be pursuant to the Federal Grant Program guidelines, policies of the State Board of Education and ACSS and the laws of the State of Georgia.
- Contractual Services and Open Competition: The use of federal funds will be based on the procurement, bids and quotes procurement standards in 2CFR 200.317 through 200.327; 2 CFR 200.318(a).
- As per CFR 200.322 Domestic preferences for Procurement All purchase orders/requisition order forms that are signed/approved (purchase order forms generated by accounts payable, subawards, and contracts will include the following statement: ACSS to the greatest extent practicable provides preference for the purchase of goods and materials produced in the U.S. Revised 10.25.2021
- Contracts are not made with debarred contractors based on Executive Orders 12549 and 12689, 2 CFR part 180, which states that, to the extent permitted by law, executive departments and agencies shall participate in a government-wide system for non-procurement, debarment and suspension.
- The Director/Administrator/Designee will maintain oversight to ensure that contractors perform in accordance with the terms, conditions, and specifications of the contract to include payment after deliverables are received.
- The Director/Administrator/Designee is/are responsible for overseen contractors, handling and coordinating the settlement with a contract who breach the terms of a contract (2 CFR 200.327 Appendix II (A).

- Contracts in excess of \$10,000 will address the following termination stipulation:
   This contract will be null and void if contractor fails to perform in accordance with
   the terms, conditions, and specification of the agreed contract.
- The Director/Administrator/Designee will complete a cost or price analysis for every procurement action over \$250,000 by reviewing the total cost to ensure that it is reasonable in comparison to current market value for the comparable product and/or service.
- The Director/Administrator/Designee will collect independent estimates before receiving bids or proposals
- The Director/Administrator/Designee will ensure that services are provided and delivered.
- Multiple year contract will include the opt-out clause to clearly state "if federal funds are no longer available the contract will void"
- Records of all above statements will be maintained to detail the history of procurement, selection/rejection of contract/contractor and the basis for the contract price. Revised 3.14.2022

#### Contracts under object 300 will include the following:

Names of who is entering the contract

Service/purchase provided

Date of services

Total fee/per hour

Timeframe of contract

Method of payment

Location of services

Signature/date

Statement: To the greatest extent practicable must provide a preference for the purchase of goods and materials produced in the U.S.

Required Certification: 200.415

An official authorized to legally bind the ACSS <u>must certify on annual and final fiscal</u> <u>reports or vouchers requesting payment:</u>

"By signing this report, I certify to the best of my knowledge and belief that the report is true, complete and accurate and the expenditures, disbursements and cash receipts are for the purposes and objectives set forth in the terms and conditions of the federal award. I am aware that any false, fictitious, or fraudulent information or the omission of any material fact, may subject me to criminal civil or administrative penalties for fraud, false statements, false claims, or otherwise."

## Capital Expense Funds

The Appling County School System does not use Title funds to budget items under object code 700 (capital expense).

# Method for Conducting Technical Evaluation of Competitive Proposals and Selecting Recipients 2CFR 200.320(d)(3); 200.318(d)(e)(f); 200.319

Methods of Procurement (2 CFR §200.67, 48 CFR Subpart 2.1)

ACSS will use the following methods of procurement:

- 1. Informal Procurement Methods When the value of the procurement for property or services under a Federal award does not exceed the simplified acquisition threshold (SAT), as defined in 200.100, or a lower threshold established by the ACSS, formal procurement methods are not required. Informal procurement methods may be used to expedite the completion of its transaction and minimize the associated administrative burden and cost. The informal methods used for procurement of property or services at or below the SAT include:
  - a. **Procurement by micro-purchases**. Procurement by micro-purchase is the acquisition of supplies or services, the aggregate dollar amount of which does not exceed the micro-purchase threshold (§200.200 Micro-purchase) of \$10,000.00, but this threshold is periodically adjusted for inflation.

ACSS will calculate the aggregate dollar amount for each purchase order of supplies or services. To the extent practicable ACSS will:

- Distribute micro-purchases equitably among qualified suppliers when enough suppliers are available to provide the service/material.
- Take all necessary affirmative steps to assure that minority businesses, women's business enterprise, and labor surplus area firms are used when possible by posting business opportunities on the district website.
- Award without soliciting competitive quotations if ACSS considers the
  price to be reasonable based on research, experience, purchase history,
  collaborating with other directors or prior customers and documentation on
  this process will be filed.
- Documenting an appropriate micro-purchase threshold based on internal controls, an evaluation of risk, and its documented procurement procedures.

As ACSS monitors purchases by program, there will be times when multiple program funds could be combined for a single purchase, professional learning for example. ACSS will remember that the total amount of the purchase, not each program's contribution, dictates the procurement procedures to follow.

b. **Procurement by small purchase procedures**. Small purchase procedures (§200.320) are those relatively simple and informal procurement methods for securing services, supplies, or other property that do not cost more than the simplified acquisition threshold (§200.88) of \$250,000.00. If small purchase procedures are used, price or rate quotations must be obtained from an adequate number (at least 2) of qualified sources as determined appropriate by ACSS. The person responsible for the making the purchase will (1) be responsible for obtaining the price/rate quote and filing all pertinent information

for auditing purposes. (2) ensuring technical evaluations are conducted in compliance with federal regulations. (3) advertising the sealed bids (4) ensuring that the process for solicitations are followed.

#### 2. Formal Procurement Methods

- **a. Procurement by competitive sealed bids** (formal advertising) for purchases greater than \$250,000.00. Bids are publicly solicited, and a firm fixed price contract (lump sum or unit price) is awarded to the responsible bidder whose bid, conforming with all the material terms and conditions of the invitation for bids, is the lowest in price (§200.329(b)).
  - i. In order for sealed bidding to be feasible, the following conditions should be present:
    - (1) A complete, adequate, and realistic specification or purchase description is available;
    - (2) Two or more responsible bidders are willing and able to compete effectively for the business; and
    - (3) The procurement lends itself to a firm fixed price contract and the selection of the successful bidder can be made principally on the basis of price.
  - ii. If sealed bids are used, the following requirements apply:
    - (1) Bids must be solicited from an adequate number of known qualified sources, providing them sufficient response time prior to the date set for opening the bids, for local, and tribal governments, the invitation for bids must be publicly advertised;
    - (2) The invitation for bids, which will include any specifications and pertinent attachments, must define the items or services in order for the bidder to properly respond;
    - (3) All bids will be opened at the time and place prescribed in the invitation for bids, and for local and tribal governments, the bids must be opened publicly;
    - (4) A firm fixed price contract award will be made in writing to the lowest responsive and responsible bidder. Where specified in bidding documents, factors such as discounts, transportation cost, and life cycle costs must be considered in determining which bid is lowest. Payment discounts will only be used to determine the low bid when prior experience indicates that such discounts are usually taken advantage of; and
    - (5) Any or all bids may be rejected if there is a sound documented Reason
- **b. Procurement by competitive proposals** (§200.320(f)). The technique of competitive proposals is normally conducted with more than one source submitting an offer, and either a fixed price or cost-reimbursement type contract is awarded. It is

generally used when conditions are not appropriate for the use of sealed bids. If this method is used, the following requirements apply:

- i. Requests for proposals must be publicized and identify all evaluation factors and their relative importance. Any response to publicized requests for proposals must be considered to the maximum extent practical;
- ii. Proposals must be solicited from an adequate number of qualified offerors;
- iii. The ACSS must have a written method for conducting technical evaluations of the proposals received and making selections;
- iv. Contracts must be awarded to the responsible offeror whose proposal is most advantageous to the program, with price and other factors considered; and
- v. The ACSS may use competitive proposal procedures for qualifications-based procurement of architectural/engineering (A/E) professional services whereby offerors' qualifications are evaluated, and the most qualified offeror is selected, subject to negotiation of fair and reasonable compensation. The method, where price is not used as a selection factor, can only be used in procurement of A/E professional services. It cannot be used to purchase other types of services though A/E firms that are a potential source to perform the proposed effort. ACSS does not use federal award funds to pay sub-recipients to carryout any programs in the district.
- **3. Procurement by noncompetitive proposals**. Procurement by noncompetitive proposals is procurement through solicitation of a proposal from only one source (sole source) and may be used only when one or more of the following circumstances apply:
  - a. The acquisition of property or services, the aggregate dollar amount of which does not exceed the micro-purchase threshold;
  - b. The item is available only from a single source;
  - c. The public exigency or emergency for the requirement will not permit a delay resulting from publicizing competitive solicitation;
  - d. The federal awarding agency or pass-through entity expressly authorizes a noncompetitive procurement in response to a written request from the ACSS; or
  - e. After solicitation of a number of sources, competition is determined inadequate.
  - f. Due to COVID-19, supplies have been limited and/or discontinued causing for emergency purchases to be made by departments with companies that have the materials/resources available.

Noncompetitive procurement can only be awarded in accordance with 200.320(c)
Revised 12.13.2021

## Procedures for Suspension and Debarment (2 CFR §200.213):

Appling County will:

1. Use the local policy and federal guidelines to follow procurement procedures which reflect applicable State and local laws and regulations, provided that the procurements conform to applicable Federal law and the standards identified in this section.

- 2. Maintain oversight to ensure that contractors perform in accordance with the terms, conditions, and specifications of their contracts or purchase orders.
- 3. Maintain written standards of conduct covering <u>conflicts of interest</u> and governing the performance of its employees engaged in the selection, award and administration of contracts. No employee, officer, or agent must participate in the selection, award, or administration of a contract supported by a Federal award if he or she has a real or apparent conflict of interest. Such a conflict of interest would arise when the employee, officer, or agent, any member of his or her immediate family, his or her partner, or an organization which employs or is about to employ any of the parties indicated herein, has a financial or other interest in or a tangible personal benefit from a firm considered for a contract. The officers, employees, and agents of Appling County School System will not solicit nor accept gratuities, favors, or anything of monetary value from contractors or parties to subcontracts. Appling County School Systems has in place disciplinary actions to be applied for violations of such standards by officers, employees, or agents of ACSS
- 4. When necessary, ACSS will enter into an agreement with state and local intergovernmental agreements or inter-entity agreements where appropriate for procurement or use of common or shared goods and services.
- 5. Use Federal excess and surplus property in lieu of purchasing new equipment and property whenever such use is feasible and reduces project costs.
- 6. Award contracts only to responsible contractors possessing the ability to perform successfully under the terms and conditions of a proposed procurement. Consideration will be given to such matters as contractor integrity, compliance with public policy, record of past performance, and financial and technical resources.
- 7. Maintain records sufficient to detail the history of procurement. These records will include, but are not necessarily limited to the following: rationale for the method of procurement, selection of contract type, contractor selection or rejection, and the basis for the contract price.
- Use Code of Federal Regulations / Title 2 Grants and Agreements / Vol. 1 / 2014-01-01118 time and material type contracts only after a determination that no other contract is suitable and if the contract includes a ceiling price that the contractor exceeds at its own risk. Time and material type contract mean a contract whose cost to ACSS is the sum of: (i) The actual cost of materials; and (ii) direct labor hours charged at fixed hourly rates that reflect wages, general and administrative expenses, and profit. Since this formula generates an openended contract price, a time-and-materials contract provides no positive profit incentive to the contractor for cost control or labor efficiency. Therefore, each contract must set a ceiling price that the contractor exceeds at its own risk. Further, the ACSS awarding such a contract must assert a high degree of oversight in order to obtain reasonable assurance that the contractor is using efficient methods and effective cost controls. The ACSS alone must be responsible, in accordance with good administrative practice and sound business judgment, for the settlement of all contractual and administrative issues arising out of procurements. These issues include, but are not limited to,

source evaluation, protests, disputes, and claims. These standards do not relieve the ACSS of any contractual responsibilities under its contracts. The Federal awarding agency will not substitute its judgment for that of the ACSS entity unless the matter is primarily a Federal concern. Violations of law will be referred to the local, state, or Federal authority having proper jurisdiction.

A person who is debarred or suspended shall be excluded from federal financial and nonfinancial assistance and benefits under federal programs and activities. Any covered transactions exceeding \$25,000.00, must be verified by checking SAM Exclusion list, collecting a certification from that person/company or adding a clause or condition to the covered transaction with that person. Reports from SAMs will be collected by each department approving expenses. Suspension and Debarment list by state: https://doas.ga.gov/state-purchasing/law-administrative-rules-and-policies/state-suspended-and-debarred-suppliers. SAMs reports on vendors are the responsibility of each Federal Program department making the purchase. Reports with dates when vendor information was checked/verified will be kept by the Federal Program Department funding the purchases. In the event that purchases to a single vendor exceeds the \$25,000.00 amount, then and in that event, the SAMs report will be collected. Revised 11.7.2022

#### **Method for Conducting Technical Evaluations of Competitive Proposals**

Bids are publicly solicited and a firm fixed price contract is awarded to the responsible bidder whose bid, conforming to all the material terms and conditions of the invitations for bids, is the lowest in price.

A complete, adequate, and realistic specifications or purchase description is available; two or more responsible bidders are willing and able to compete effectively for the business; and the procurement lends itself to a firm fixed-price contract and the selection of the successful bidder can be made principally on the basis of price. The invitation for bids must be publicly advertised. All bids will be opened at the time and place prescribed in the invitation for bids. The bids must be opened publicly. Where specified in bidding documents, factors such as discounts, transportation cost, and life cycle costs must be considered in determining which bid is the lowest. Any and all bids may be rejected if there is sound documented reason. Bidding my not be an option when a sole source company provides service/material, during an emergency situation or has entered into a contract with the ACSS to provide such service on an ongoing basis.

#### **Price Analysis Competitive Contracts**

The price analysis determines if the lump sum price is fair and reasonable based on current market value for comparable products or services. In general, the price analysis can only be used with competitive contracts and is usually used with fixed price contracts.

Total cost must be reasonable in comparison to current market value for

comparable products and services.

#### **Statewide Contracts – Georgia Department of Administrative Services**

To the extent that a need exists for purchasing contracted services or equipment with federal funds, ACSS may utilize Georgia's statewide contracts for the procurement of services in the same capacity as state agencies and universities. The use of statewide contracts may benefit ACSS federal programs in that these contracts can, oftentimes, fill a need for specialized supplemental supports such as interpreting and translation services, to name two relevant examples. In exercising this option for the procurement of services, ACSSs will follow the ordering instructions listed on the individual contract information sheets. ACSSs should follow their own internal processes for using these statewide contracts as administered by the Georgia Department of Administrative Services (DOAS). These statewide contracts developed by DOAS adhere to the Code of Federal Regulations (CFR) 200 Procurement Standards for states.

#### **Contract Administration**

The district awards contracts only to responsible contractors possessing the ability to perform successfully under the terms and conditions of a proposed procurement. The district considers such matters as contractor integrity and business ethics, compliance with public policy, ability to complete the project on time in accordance with specifications, record of past performance, and the contractor's financial and technical resources.

The district will check references where possible and engage in practical activities to ensure there are no outstanding complaints against the contractor.

The district will award a contract to a contractor who has the appropriate experience, expertise, qualifications, and any required certifications, necessary to perform the work. Contractors should also have financial resources to sustain the project while the initial work is being completed and during each service period until he or she submits invoices for payment to the district as work is completed. Contractors should have the proper equipment necessary to complete the contracted work. ACSS does not use federal award funds to pay sub-recipients to carry out any educational programs in the district.

#### **Vendor Selection**

Vendor will be selected on the following criteria:

the purchase prices

the reputation of the vendor and the vendor's goods or services

the quality of the vendor's goods or services

the extent to which the goods or services meet the district's needs

the vendor's past relationship with the district

the impact on the ability of the districts to comply with laws and rules relating to historically underutilized businesses

the total long-term cost to the district to acquire the vendor's good and services

the vendor's response time and compatibility of goods/products purchased already in the district

#### **Settlement of Issues Arising Out of Procurement**

The district is responsible for the settlement of all contractual and administrative issues arising out of procurements made with federal funds. These issues include, but are not limited to, source evaluation (analyzing information in order to assess their credibility), protests, disputes, breach of contract and claims. Violations of law will be referred to the local, state, or federal authority having proper jurisdiction. The Director/Administrator/Designee is/are responsible for handling and coordinating the settlement of any contractual and administrative issues arising out of procurements.

#### **Protest Procedures to Resolve Disputes**

The district will exhaust all efforts to resolve disputes relating to procurements made with federal funds. The protestor must exhaust all administrative remedies with the district before pursuing a protest with a federal agency. The Director/Administrator/Designee is/are responsible for handling and coordinating any disputes relating to procurement.

#### Pre-Award Costs (2CFR §§200.1, 200.10, 200.458)

Pre-award costs are those incurred by ACSS prior to the effective date of the federal award or subaward directly pursuant to the negotiation and in anticipation of the Federal Award where such cost is necessary for efficient and timely performance of the scope of work. Such cost is allowable only to the extent that they would have been allowable if incurred after the date if the Federal award and only with the written approval of the Federal awarding agency. If charged to the award, these costs must be charge to the initial budget period of the award, unless otherwise specified by the Federal awarding agency or pass-through entity. Essentially, ACSS may incur expenditures between July 1 and their substantially approved budget and charge them to the grant if the expenditures are:

- Necessary for efficient and timely performance to carry out the purpose of the grant
- Allowable under each grant's authorized use(s) of funds
- Charged to the initial budget period of the grant (first 15 months of ESSA/IDEA grants)

Unless ACSS has written prior approval from GaDOE, incurred expenditures should not be charged to the grant until the grant is approved. At that time ACSS may journal entry allowable, documented expenditures from local funds into the federal grant. Multiple year contract will include the opt-out clause stating "if Title I funds are no longer available the contract will be void". Revised 12.13.2021

<u>Period of Performance (27 months) Flexibility</u> (2 CFR §200.77, 200.309, 200.403(g); 34 CFR §76.707)

ACSS understand that the intent of federal funds is to benefit students, teachers, and school leaders in that fiscal year through the grant period as indicated on the Grant

Award Notice (GAN). Regarding purchases that cross grant periods (software, computers, and equipment), GaDOE has providing flexibility as follows:

- Purchases may extend beyond one year to take advantage of cost reductions,
   IF the students, teachers and school leaders in the current fiscal year receive benefit from the purchase.
- Leases and licenses If instructional software subscriptions are purchased after January, the ACSS will need to provide explanation within the budget description indicating how students in the current fiscal year will benefit from the purchase. Professional learning and/or recruitment software and/or licensing do not require an explanation within the budget description.
- PL Registration To maximize cost efficiency, ACSS may take advantage of early bird professional development registration where early bird registration occurs in the original grant period and the actual professional development occurs in the carryover period. Supporting documentation should be kept on file.

In general, and to reduce risk of non-compliance, GaDOE has strongly advised that ACSS align all purchases to the original grant period as much as possible. GaDOE recognizes that each purchase is circumstantial and encourages ACSS to carefully plan purchases weighing all options and maximizing benefits to ACSSs students and staffs as good stewards of taxpayer dollars. Revised 12.13.2021

Mandatory Disclosures 200.113: Must disclose in writing all violation of federal criminal law involving fraud, bribery, or gratuity violations potentially affecting the federal award.

## Conflict of Interest 200.318(c)(1):

The employees of Appling County School System have the responsibility of administering the affairs of the District honestly and prudently, and of exercising their best care, skill, and judgment for the sole benefit of the District. Those persons shall exercise the utmost good faith in all transactions involved in their duties, and they shall not use their positions with the school system or knowledge gained therefrom for their personal benefit. The interests of the organization must be the first priority in all decisions and actions. 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. The trainings at the district level that includes conflict of interest is done by each employee on their own. Employee signs off at the beginning of each year that they have reviewed Board Policies and the Personnel Handbook. This requirement goes out in an email to all staff members. Staff members complete the modules on the SafeSchools platform. Principals collect and submit the signed form to the district office to file in each employee's personnel file.

In order to eliminate any conflicts of interest from taking place, ACSS--directors, officers, and management employees will not engage, be part of, or involved in business with any of the following:

- 2. Persons and firms supplying goods and services.
- 3. Persons and firms from whom the District leases property and equipment.

- 4. Competing or affinity organizations.
- 5. Donors and others supporters.
- Agencies, organizations and associations which affect the operations of the District.
- 7. Family members, friends, and other employees.

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

- 1. Owning stock or holding debt or other proprietary interests in any third party dealing with the District.
- 2. Holding office, serving on the board, participating in management, or being otherwise employed (or formerly employed) with any third party dealing with the District.
- 3. Receiving remuneration for services with respect to individual transactions involving the District.
- 4. Using time, personnel, equipment, supplies, or good will for other than District/Program-approved activities, programs, and purposes.
- 5. Receiving personal gifts or loans from third parties dealing or competing with the District. Receipt of any gift is disapproved except gifts of a value of \$25.00 or less, which could not be refused without discourtesy. No personal gift of money should ever be accepted.

The areas of conflicting interest listed above, and the relations in those areas which may give rise to conflict, as listed above, are not exhaustive. Conflicts might arise in other areas or through other relations. It is assumed that the directors, officers, and management employees will recognize such areas and relation by analogy. The fact that one of the interests described above does not necessarily mean that a conflict exists, or that the conflict, if it exists, is material enough to be of practical importance, or if material, that upon full disclosure of all relevant facts and circumstances it is necessarily averse to the interests of the District. However, any of the interests described above shall be disclosed before any transaction is consummated. It shall be the continuing responsibility of the board, officers, and management employees to scrutinize their transactions and outside business interests and relationships for potential conflicts and to immediately make such disclosures. No employee, officer or agent may not participate in selection, award or administration if there is a real or apparent conflict of interest.

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

- 1. The conflicting interest is fully disclosed;
- 2. The person with the conflict of interest is excluded from the discussion and approval of such transaction;
- 3. A competitive bid or comparable valuation exists; and
- 4. The District has determined that the transaction is in the best interest of the organization.

- 5. Disclosure in the organization should be made to the Superintendent or Federal Programs Directors.
- 6. The Superintendent and/or School Board shall determine whether a conflict exists and in the case of an existing conflict, whether the contemplated transaction may be authorized as just, fair, and reasonable to District. The decision of the Superintendent and/or School Board on these matters will rest in their sole discretion, and their concern must be the welfare of the District and the advancement of its purpose. Dissemination of this information is provided in this manual to all principals to review with staff.

Board Policy BHA: Board Member Conflict of Interest Status: ADOPTED Original Adopted Date: 12/16/2002 | Last Revised Date: 11/22/2010.

The Appling County Board of Education shall adhere to these Conflict of Interest provisions, as set forth in state law.

#### **Financial Governance**

- 1. No Board member shall use or attempt to use his or her official position to secure unwarranted privileges, advantages, or employment for himself or herself, his or her immediate family member, or others.
- 2. No Board member shall act in his or her official capacity in any matter where he or she, his or her immediate family member, or a business organization in which he or she has a material financial interest that would reasonably be expected to impair his or her objectivity or independence of judgment. Compliance with Code Section 20-2-505 shall not constitute a violation of this paragraph.
- 3. No Board member shall solicit or accept or knowingly allow his or her immediate family member or business organization in which he or she has an interest to solicit or accept any gift, favor, loan, political contribution, service, promise of future employment, or other thing of value based upon an understanding that the gift, favor, loan, contribution, service, promise, or other thing of value was given or offered for the purpose of influencing that board member in the discharge of his or her official duties. This paragraph shall not apply to the solicitation or acceptance of contributions to the campaign of an announced candidate for elective public office if the local board of education member has no knowledge or reason to believe that the campaign contribution, if accepted, was given with the intent to influence the local board of education member in the discharge of his or her official duties. For purposes of this paragraph, a gift, favor, loan, contribution, service, promise, or other thing of value shall not include the items contained in subparagraphs (a)(2)(A) through (a)(2)(J) of Code Section 16-10-2.

- 4. No Board member shall use, or knowingly allow to be used, his or her official position or any information not generally available to the members of the public which he or she receives or acquires in the course of and by reason of his or her official position for the purpose of securing financial gain for himself or herself, his or her immediate family member, or any business organization with which he or she is associated.
- 5. No Board member or business organization in which he or she has an interest shall represent any person or party other than the local board of education or local school system in connection with any cause, proceeding, application, or other matter pending before the local school system in which he or she serves or in any proceeding involving the local school system in which he or she serves.
- 6. No Board member shall be prohibited from making an inquiry for information on behalf of a constituent if no fee, reward, or other thing of value is promised to, given to, or accepted by the local board of education member or his or her immediate family member in return therefor.
- 7. No Board member shall be deemed in conflict with these provisions if, by reason of his or her participation in any matter required to be voted upon, no material or monetary gain accrues to him or her as a member of any profession, occupation, or group to any greater extent than any gain could reasonably be expected to accrue to any other member of that profession, occupation, or group.
- 8. No Board member may also be an officer in any organization that sells goods or services to that local school system, except as provided in Code Section 20-2-505 and excluding nonprofit membership organizations.
- 9. No Board member shall sell to any county board any supplies or equipment used, consumed, or necessary in the operation of any public school in this state unless there are fewer than three sources for such supplies or equipment within the county; provided, however, that any purchase pursuant to this subsection for supplies or equipment that is equal to or greater than \$10,000.00 shall be approved by a majority of the members of the board in an open public meeting. Any member violating this shall be guilty of a misdemeanor.
- 10. No local board may do business with a bank or financial institution where a Board member is an employee, stockholder, director or officer when such board member owns 30% or more stock in that institution.
- 11. No Board member may have a financial interest in school buses, bus equipment or supplies, provide services for buses owned by the Board, or sell gasoline to the Board from a corporation in which the Board member is a Board Policy Manual Appling County Schools shareholder.

12. No Board member shall accept a monetary fee or honorarium in excess of \$101.00 for a speaking engagement, participation in a seminar, discussion panel, or other activity that directly relates to the official duties of that public officer or the office of that public officer. Actual and reasonable expenses for food, beverages, travel, lodging, and registration for a meeting which are provided to permit participation in a panel or speaking engagement at the meeting shall not be monetary fees or honoraria.

#### **Conduct as Board Member**

- 1. No Board member shall disclose to or discuss any information which is subject to attorney-client privilege belonging to the local board of education to any person other than other Board members, the Board attorney, the local school superintendent, or persons designated by the local school superintendent for such purposes unless such privilege has been waived by a majority vote of the whole Board.
- 2. No Board member shall vote on the employment or promotion of a member of the immediate family. No member of a board member's immediate family may be employed or promoted unless a public, recorded vote is taken separately from all other personnel matters. As used in this Code section, the term "immediate family" means a spouse, child, sibling, or parent or the spouse of a child, sibling, or parent.
- 3. No Board member may be employed in any position in the school district in which they serve.
- 4. No Board member shall hold another county office.
- 5. No Board member shall be employed by the State Department of Education or serve concurrently as a member of the State Board of Education.
- 6. No Board member shall serve on the governing body of a private elementary or secondary educational institution.

Each member of this Board understands and acknowledges that no person shall be eligible for election as a member of a local board of education unless he or she:

(1) Has read and understands the code of ethics and the conflict of interest provisions applicable to members of local boards of education and has agreed to abide by them; and

(2) Has agreed to annually disclose compliance with the State Board of Education's policy on training for members of local boards of education, the code of ethics of the local board of education, and the conflict of interest provisions applicable to members of local boards of education.

Each person offering his or her candidacy for election as a member of a local board of education shall file an affidavit with the officer before whom such person has qualified for such election prior to or at the time of qualifying, which affidavit shall affirm that he or she meets all of the qualifications required pursuant to this subsection. This subsection

shall apply only to local board of education members elected or appointed on or after July 1, 2010. Revised 3.14.2022

Board Policy BH: Board Code of Ethics: ADOPTED Original Adopted Date: 12/16/2002 | Last

Revised Date: 02/28/2011

## **Chain of Command:**

#### **Conflicts of Interest for Board Members**

- 1. Announce potential conflicts of interest before board action is taken.
- 2. Comply with the conflicts of interest policy of the board, all applicable laws and related requirements established by the State Board of Education.

Upon a motion supported by a two-thirds (2/3) vote, the board may choose to conduct a hearing concerning a possible violation of this Code of Ethics by a member of the board. The board member accused of violating this Code of Ethics will have thirty (30) days' notice prior to a hearing on the matter. The accused board member may bring witnesses on his or her behalf to the hearing, and the board may elect to call witnesses to inquire into the matter. If found by a vote of two-thirds of all the members of the board that the accused board member has violated this Code of Ethics, the board shall determine an appropriate sanction. A board member subject to sanction may, within thirty (30) days of such sanction vote, appeal such decision to the State Board of Education in accordance with the rules and regulations of the State Board of Education. A record of the decision of the board to sanction a board member for a violation of this Code of Ethics shall be placed in the permanent minutes of the board.

## **SECTION 19: EQUIPMENT AND REAL PROPERTY**

These procedures apply to all Federal Programs, Grants, State and Local Funding.

The Appling County System recognizes that the purpose of Federal Programs funds is to enable our schools to provide opportunities for at risk and disadvantaged children to acquire the knowledge and skill contained in the challenging state academic standards and to meet these standards. A process to maintain financial management systems that substantially comply with federal systems management requirements, adequate internal controls for the purchase, management, and inventory of equipment will ensure that the equipment is used, maintained and disposed of according to Georgia Law and Federal Regulations and Guidelines.

Federal program directors are responsible for monitoring of equipment and inventory by managing the day-to-day operations of the grant and its supported activities to ensure that the requirements of the grant are met. The monitoring includes the purchasing, use and disposal of property.

#### **Requisition of Equipment:**

All equipment purchases made with federal funds will be in accordance with the regulations of the funding source, must be necessary, reasonable, allocable, and allowable. All equipment will be used based on the funding source that paid for such equipment.

#### Entry of Information into Inventory Management System - Eduphoria

Once equipment has been received, ACSS's designated person, the school's media specialist, within a week, will enter the information into the districts inventory management system. Each Federal Program Director and school principals are responsible for the management and inventory of such equipment. The inventory must be available for review and evaluation. One copy should be kept in the school and another copy at the district office.

#### General procedures:

- All equipment will be properly identified and labeled/marked for inventory tracking. If a label is available then it will identify the funding source and the fiscal year of purchase. Serial numbers are used as the main tracking identifier.
- The school shall retain such property in a program as long as there is need for such property to accomplish the purpose of the program for which it was purchased.
- 3. The inventory will be current and available for review and audit.

#### **INVENTORY**

System inventory is maintained on a spreadsheet that identifies all the required components to identify each inventoried item. Vendor contracts are maintained with purchase orders. Physical inventories are conducted once per year. Principals and

Media Specialists sign an assurance in regard to the inventory. Documentation of physical inventories are kept by each federal program department.

Federal Programs inventory is current and available for review and audit as per 2 C.F.R. 200.311, 2 CFR 200.313 and 2 C.F.R. 200.439 states the following information must be included in the recipient's inventory records:

- 1. Title/Description of inventory items
- 2. Cost
- 3. Source of Funding
- 4. FAIN number
- 5. Date of Purchase
- 6. Vendor/Professional
- 7. Serial Number
- 8. Location/Room Number
- 9. Use of items
- 10. Condition of Property (new, used, good)
- 11. Disposition Date

Completion of inventory includes noting the condition of the equipment, identifying equipment for replacement or disposition and adding of new items. Inventory must be updated as equipment items are disposed, transferred or new purchases are made. Adequate safeguards are in place related to the loss, damage, or theft of the equipment. Any loss, damage, or theft should be investigated and fully documented.

#### The following process will be followed:

- 1. Federal Guidelines states: Equipment and real property (including pilferable items) purchased with Federal Programs will be marked with information on the program and purchase year. Significant technological items are now available for under \$500.00. For inventory purposes, in the Appling County School System, all "Significant technological items" under \$500.00 will be inventoried. For example: PDAs, digital cameras, iPads, tablets, Kindle, laptops, and computers that may be easily lost or stolen and are defined as having a useful life of more than one year. Items that will not need to be inventoried include: consumable items and items valued below \$200.00 such as, projector bulbs, keyboards, mouse, projector mounts, and/or SD cards. Revised 2/17/2021
- 2. A physical inventory of the property must be taken and the results reconciled with the property records once per year (due dates for this report are set at the beginning of each school year, usually October and February). Staff will take the inventory for the equipment in his/her room and the media specialist will sign off on the final inventory after staff have signed verifying what is located in the room. The inventory must also be signed and dated by the Principal or federal program director. Inventory must be taken of property located in all ACSS schools including N&D Facilities, and central office. Once physical inventory has been completed by the schools, the signed report is sent to the board office. Federal Program Director spot checks inventory to ensure that new inventory has been inventoried at each

school. In the event that inventories are not up to date, follow up emails are sent to the media specialist and principal. As needed technical assistance has been provided to those schools that have missing inventory until it has been completed and resubmitted for final review and approval.

3.All equipment and real property must be disposed according to guidance from The Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Rewards (2 C.F.R. Part 200.313(e) and the ACSS disposition policy.

#### **Off-Site Use of Equipment:**

Equipment to be used off site is checked out to the individual making the request for taking equipment to a different location even if within the school building. Equipment must be used according to its funding source.

#### Theft of Equipment or Technology Funded by Federal Funds

In the event Federal Programs equipment or technology is stolen and/or lost the following procedure will be followed:

- File an incident report with the police
- Attach the incident report to the Technology Disposal Form and send to the Federal Programs Director's office.
- Make corrections to the Federal Programs inventory and maintain notation of the incident for 3 years.
- Send the updated inventory to the Federal Program Director's office. The principal or other designee must sign and date the inventory spreadsheet.

#### **USE OF EQUIPMENT**

Each school receives the "General Guidelines for the Use of Title I Equipment" (see Appendix C in this manual) information provided by the Department of Education, and the information provided within the document is discussed with leadership personnel.

#### **DISPOSITION OF ASSETTS:**

All properties and surplus materials no longer used or currently adopted by the Appling County School System may be disposed by a variety of methods as long as the system receives some value from the disposed properties, except real property which may be sold, other than to government entities, by a sealed bid. The system will keep records documenting the value received from the disposed property or surplus

#### **Procedures for Deposition of Equipment:**

Original or replacement equipment acquired with federal funds is no longer needed for the original project or program, the equipment may be retained if still working, sold or disposed if not working, beyond repair, running on old operating system or not comparable for updates. There are two technical specialists in the district who provide services to all the schools and the district office. Equipment is maintained and fixed if

an option by the technical specialist in the district. The ACSS will ensure that records are kept and made available for monitors and auditors as to where the equipment was disposed or transferred.

School's media specialist initiates the documentation of items that are being disposed by completing the disposition form, securing administration signatures, updating information on Inventory Management System-Eduphoria and keeping paper copies for records. Disposition forms are sent to the district office. Each Federal Program Department secures signatures, copies are made and provided to Tech Specialist at the district office and originals are kept by each Federal Program having an ownership of the disposed equipment.

#### **Procedures for Disposition of Supplies:**

In the disposition of supplies, if there is a residual inventory of unused supplies exceeding \$5,000 in total aggregate fair market value upon termination or completion of the award, and if the supplies are not needed for any other federally sponsored programs or projects, the federal program owning these supplies, shall compensate the awarding agency for its share at \$500 or 10-percent of sales.

When possible, the system should use a competitive bidding process in order to get the best price of properties/surplus to be sold.

A Disposal Request Form must be completed and sent to the Board of Education Central Office for approval by the Superintendent or designee prior to the disposal of any properties or surplus.

The following are the procedures to eliminate any equipment item from the inventory:

- 1. Equipment items with an acquisition cost/current per unit fair market (an explanation is provided in the Definitions section) value of less than \$5,000 and are more than three years old may be retained, sold or disposed, with no further obligation to the Department. The disposition of such items should be so noted on the equipment inventory maintained by the ACSS.
- 2. Equipment items with an acquisition cost of \$5,000 or more may be retained or sold and the awarding agency (Department) shall have a right to amount calculated by multiplying the current market value or proceeds from sale by the awarding agency (Department's) share of the equipment.
  - a. If the current per unit fair market value is \$5,000 or more, the equipment may be retained or sold and the awarding agency (Department) shall have a right to an amount calculated by multiplying the current market value or proceeds from the sale by the state's share of the equipment. However, the entity is permitted to deduct and retain from the state's share \$500 or 10-percent of the sales proceeds, whichever is less, for the entity's selling and handling expenses. Note: The Department does not require this of

Georgia's Title I ACSSs. To date, the Department has not required this action of ACSSs for the sale of Title I property in a district. However, this procedure is outlined in 2 C.F.R. Part 200.313 (d)(5)(e)(1-4) and allows a state to require this process from ACSSs.

b. The disposition of such items should be so noted on the equipment inventory maintained by the recipient. The recipient should include the date of disposal.

## **SECTION 20: REPORTING**

Annual Completion Reports are prepared with function/object detail and submitted on a timely basis. Completion Reports submitted via the state GAORS system are automatically subject to function/object comparative edits with the latest-filed Consolidated Application budget. Completion Report copies are kept on file in the district central office for all grant programs with a Completion Report requirement.

Supporting source documentation is kept on file in the central office for all program revenues and expenditures and for all program payment/reimbursement/draw down requests. Support includes applicable Budget Status Reports and Year-to-Date Transaction Reports. Other program reports are readily available on demand.

Supporting source documentation is kept on file either in the district central office or in the applicable grant director's office for all quarterly sub-recipient data reports to GaDOE. Support includes applicable Budget Status Reports, Year-to-Date Transaction Reports, and General Ledger reports supporting vendors paid. Other program reports are readily available on demand.

The CFO submits online quarterly reports of expenditure of Title I and other Federal Programs funds to the state on a timely basis. The reports contain the following information:

- The total amount of funds allocated to the system;
- The amount of funds received that were obligated and expended to projects or activities;
- The amount of unobligated balances;
- A detailed list of all projects or activities for which funds were obligated and expended, including
  - Name of the project or activity;
  - Description of the project or activity;
  - Evaluation of the completion status of the project or activity;
  - Estimate of the number of jobs created and number of jobs retained by the project or activity;

Prior to each submission, technical assistance is provided via an Elluminate session by the GaDOE.

# SECTION 21: Title IX HOMELESS CHILDREN AND YOUTH

The McKinney-Vento Homeless Assistance Act was reauthorized under the Elementary and Secondary Education Act (ESSA) to ensure the educational rights and protections for children and youth experiencing homelessness. ESEA made significant changes in the way ACSS (ACSSs) address the needs of homeless students. Among these changes are requirements for:

- The Georgia Department of Education (GaDOE) and ACSSs to review and revise laws, regulations, practices, or policies that may act as a barrier to the enrollment, attendance, and success in school of homeless children and youth.
- ACSSs to use the McKinney-Vento Homeless Assistance Act definition of homeless when identifying and determining which students are eligible for services.
- ACSSs to designate a local liaison to coordinate services to ensure that homeless children and youth enroll in school and have the opportunity to succeed academically.
- ACSSs to coordinate the local plan required under Title I with the needs of homeless children and youth, including making a mandatory set-aside of funds under Title I, Part A to serve homeless children.
- The McKinney-Vento Homeless Assistance Act guarantees to homeless children the following:
- The right to immediate enrollment in school.
- The right to attend school in school of origin or in the attendance area where family currently resides.
- The right to receive transportation to school of origin if requested by parents and is in the best interest of the child.
- The right to comparable services as other schoolmates including transportation and supplemental services.
- The right to attend school along with children not experiencing homelessness.
- The posting of homeless students' rights in all schools and other places around the community that low-income families and high-risk families may visit.

#### HOMELESS LIAISON RESPONSIBILITIES

The Appling County homeless liaison is the heart of the ACSS homeless program. It is important that the homeless liaison have some knowledge and experience in dealing with Federal programs, social worker responsibilities, and counseling responsibilities. It is important that the ACSS homeless liaison has knowledge of the district, understands the community, has great communication skills, and has a commitment to the homeless program.

Appling County's homeless liaison meets, at minimum, yearly meets with school personnel to discuss the requirements of the McKinney-Vento Homeless Education Act.

Appling County' Homeless plan has the following components addressed,

- The process for the identification and enrollment of homeless children and youth.
- The services to be provided to homeless children and youth.
- Collaborates with Federal Programs Director to reserve Title I, Part A funds to provide comparable services for homeless children and youth.
- Develops, reviews, and revise ACSS policies to remove barriers to the enrollment and retention of children and youth in homeless situations.
- The process for ensuring that transportation is provided to homeless children and youth.
- Ensures that accurate data is collected on enrolled homeless children and youth.
- Homeless children and youth are identified by school personnel and through coordination activities with other entities and agencies.
- Homeless students enroll in, and have full and equal opportunity to succeed in school.
- Homeless children and youth and their families, including unaccompanied youth receive educational services for which they are eligible, including Head Start, preschool programs administered by the ACSS, referrals to health, mental health, dental, and other appropriate services.
- Parents or guardians of homeless children and youth, and unaccompanied youth are informed of educational and related opportunities available to their children, and are provided with meaningful opportunities to participate in the education of their children.
- Parents or guardians of a homeless child or youth, and unaccompanied youth are fully informed of all transportation services, including transportation to and from the school of origin, and are assisted in accessing transportation services to their selected school.
- Enrollment disputes are mediated in accordance with the requirements of the McKinney- Vento Homeless Assistance Act.
- Public notice of the educational rights of homeless students is disseminated in all schools and other places around the community.
- Verification of all components of McKinney-Vento Homeless Assistance Act and ARP-HCY are met for implementation, monitoring and effectiveness.

#### **PUBLIC NOTICE REQUIREMENTS**

Posters, brochures, and other awareness materials explaining educational rights, programs, and other related services for those families experiencing homelessness are required to be posted in the registration area of all schools and other locations that low-income and high risk families receive services.

The homeless liaison supervises and works very closely with the school guidance counselors, social workers, and transportation director to assure students receive the services they need. He provides new or additional posters and assures these are placed where parents can readily see them. A committee recently reviewed and revised Appling's policy and procedures for homeless students.

# **Appling County Homeless Procedures**

LOCAL EDUCATIONAL AGENCY (ACSS) POLICIES AND PROCEDURES TO IMPLEMENT THE MCKINNEY-VENTO HOMELESS ASSISTANCE ACT (Reviewed/Revised 4/16/2018)

#### Identification

Identification of potential children experiencing homelessness is an ongoing activity in the ACSS. The main form of identification of potential children experiencing homelessness is through the School Residency and Occupational Survey. This form is included in all ACSS registration packets. Once the School Residency and Occupational Survey is returned to the schools, the receiving/receptionist/data clerks sends it to the district office. The Federal Programs Director and Homeless Liaison reviews every School Residency and Occupational Survey. Based on the information provided on the School Residency and Occupational Survey, the forms requiring additional follow-up are saved/uploaded to the Q-drive for further follow up. All School Residency and Occupational Surveys that have been saved/uploaded to the Q-drive are filled with notes on the outcome of the interview/contact information.

In collaboration with school personnel and community organizations, Appling County's homeless liaison, will identify children and youth experiencing homelessness in the ACSS, both in and out of school.

- Appling County's homeless liaison, will train school personnel on possible indicators of homelessness, sensitivity in identifying families and youth who are experiencing homelessness, and procedures for forwarding information indicating homelessness to the liaison.
- Appling County's homeless liaison, will also instruct school registrars and secretaries to inquire about possible homelessness upon the enrollment and withdrawal of every student, and to forward information indicating homelessness to the liaison.
- Community partners in identification may include: family and youth shelters, soup kitchens, motels, campgrounds, drop-in centers, the Divisions of Family and Children Services and other social service agencies, street outreach teams, faith-based organizations, truancy and attendance officers, local homeless coalitions, and legal services.
- Appling County's homeless liaison, will keep data on the number of children and youth experiencing homelessness in the district, where they are living, their academic achievement (including performance on statewide and district wide assessments), and the reasons for any enrollment delays and/or interruptions in their education or school transfers.

#### **School Selection**

Each child or youth experiencing homelessness has the right to:

- 1. Remain at his or her school of origin, or
- 2. Attend any school that housed students who live in the attendance area in which the child or youth is actually living are eligible to attend.
- 3. Maintaining a student in his or her school of origin is important for both the student and the ACSS. Students who change schools have been found to have lower test scores and overall academic performance than peers who do not change schools. High mobility rates have also been shown to lower test scores for stable students. Keeping students in their schools of origin enhances their academic and social growth, while permitting our schools to benefit from the increased test scores and achievement shown to result from student continuity.
- 4. Children and youth experiencing homelessness shall remain at their schools of origin to the extent feasible, unless that is against the parent's or youth's wishes or not in the best interest of the child. Students may remain at their schools of origin the entire time they are experiencing homelessness, and until the end of any academic year in which they become permanently housed. The same applies if a child or youth loses his or her housing between academic years.

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

- Safety of the student.
- Continuity of instruction.
- Likely area of family's or youth's future housing.
- Time remaining in the academic year.
- Anticipated length of stay in temporary living situation.
- School placement of siblings.
- Whether the student has special needs that would render the commute harmful.

Services that are required to be provided, including transportation to and from the school of origin (see below) and services under Federal and other programs, shall not be considered in determining feasibility.

#### **Enrollment**

Consistent, uninterrupted education is vital for academic achievement. Due to the realities of homelessness and mobility, students experiencing homelessness may not have school enrollment documents readily available. Nonetheless, the school selected for enrollment must immediately enroll any child or youth experiencing homelessness. Enrollment may not be denied or delayed due to the lack of any document normally required for enrollment, including:

- Proof of residency.
- Transcripts/school records (The enrolling school must contact the student's previous school to obtain school records. Initial placement of students whose

records are not immediately available can be made based on the student's age and information gathered from the student, parent and previous schools or teachers.)

- Immunizations or immunization/health/medical/physical records (If necessary, the school must refer students to the liaison to assist with obtaining immunizations and/or immunization and other medical records. Health records may often be obtained from previous schools or state registries, and schoolbased or community-based clinics can initiate immunizations when needed.)
- Proof of guardianship.
- Birth certificate.
- Any other document requirements.
- Unpaid school fees.
- Lack of uniforms or clothing that conforms to dress codes.
- Any factor related to the student's living situation.

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

#### **Procedures for Education of Homeless Children and Youth**

In the monitoring process for homeless students enrolling in Appling County School System, every consideration will be given to students transferring into the Appling County Schools to honor full or partial credits obtained in other ACSS's. Support services will be provided to assist students in successfully completing coursework impacted by the students' homeless living situation. The homeless liaison will assist the school in determining what support services are needed and appropriate. Appling County will implement the following procedures for awarding full or partial coursework credit as it relates to Carnegie unit credits for students enrolling in grades 9-12 to ensure that all students who are identified as homeless are treated much like any other student who enrolls at Appling County High School.

- We request records and make every attempt to piece together an academic history for the student.
- Students are placed in their appropriate grade level based on ACHS graduation requirements and Carnegie unit credits.
- Only credits posted on an official high school transcript can be awarded on an Appling County High School transcript.
- Students who are credit deficient, for whatever reason, are given opportunities to earn additional credit through the credit recovery program, Ombudsman program, or summer school.
- In cases where students are identified as homeless, the homeless liaison is notified, and the homeless liaison offers appropriate services that are afforded through the McKinney-Vento Act.

#### **Transportation**

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

Transportation shall be provided for the entire time the child or youth has a right to attend that school, as defined above, including during pending disputes. The length of the commute will only be considered in determining the feasibility of placement in the school of origin based on potential harm to the student, as discussed above. Parents and unaccompanied youth must be informed of this right to transportation before they select a school for attendance.

Schools and the homeless liaison shall use the district transportation form to process transportation requests. Requests shall be processed and transportation arranged without delay. If the student experiencing homelessness is living and attending school in Appling County's homeless liaison, shall arrange transportation. If the student experiencing homelessness is living in Appling County but attending school in another ACSS or attending school in Appling County but living in another, the ACSS will follow the McKinney-Vento Homeless Assistance Act statute to determine who must arrange transportation. It is Appling County's policy that inter-district disputes shall not result in a student experiencing homelessness missing school. If such a dispute arises, Appling County will arrange transportation and immediately implement the procedures for the dispute resolution.

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

#### Services

- Transportation
- Title I, Part A
- Title I, Part C
- Title III, Part A
- Special education
- Programs for English learners
- Vocational and technical education programs
- Gifted and talented programs
- School nutrition programs
- Before-school and after-school programs
- In-school tutoring
- Summer School

Appling County recognizes that children and youth experiencing homelessness suffer from disabilities at a disproportionate rate, yet frequently are not evaluated or provided

appropriate special education and related services. To address this problem, evaluations of children and youth experiencing homelessness suspected of having a disability shall be given priority and coordinated with students' prior and subsequent schools as necessary, to ensure timely completion of a full evaluation. When necessary, Appling County shall expeditiously designate a surrogate parent for unaccompanied youth suspected of having a disability. If a student has an Individualized Education Program (IEP), the enrolling school shall immediately implement it. Any necessary IEP meetings or re-evaluations shall then be conducted expeditiously. If complete records are not available, IEP teams must use good judgment in choosing the best course of action, balancing procedural requirements and the provision of services. In all cases, the goal will be to avoid any disruption in appropriate services.

When applying any Appling County policy regarding tardiness or absences, any tardiness or absence related to a child or youth's living situation shall be excused. Appling County will follow state procedures to ensure that youth experiencing homelessness and youth who are out of school are identified and accorded equal access to appropriate education and support services. School personnel shall refer children and youth experiencing homelessness to appropriate health care services, including dental and mental health services. The homeless liaison will assist the school in making such referrals, as necessary.

School personnel must also inform parents of all educational and related opportunities available to their children and provide parents with meaningful opportunities to participate in their children's education.

ESSER III – ARP Homeless Children and Youth I & II funds are spent based on the approved Application Plan. A system navigator has expanded the outreach services by facilitating the identification, enrollment, and education success of children covered under this program. Retired educators serve as tutors by providing push-in services. Effectiveness of services is an ongoing process that primarily focuses on the whole child and the academic data collected for follow up services. Ongoing monitoring takes place thought-out the year by constant communication between homeless liaison and the contracted service providers. Revised 11.7.2022

# **Disputes**

If a dispute arises over any issue covered in this policy –

- The child or youth experiencing homelessness shall be immediately admitted to the school in which enrollment is sought, pending final resolution of the dispute.
- The parent or guardian of the child or youth shall be provided with a written explanation of the school's decision regarding school selection or enrollment, including the rights of the parent, guardian, or youth to appeal the decision
- The child, youth, parent, or guardian shall refer to the local educational agency liaison designated under paragraph (1) (J) (ii), who shall carry out the dispute resolution process as described in paragraph (1) © as expeditiously as possible after receiving notice of the dispute; and

- In the case of an unaccompanied youth, the homeless liaison shall ensure that the youth is immediately enrolled in school pending resolution of the dispute. The school selected in accordance with this paragraph shall immediately enroll the homeless child or youth, even if the child or youth is unable to produce records normally required for enrollment, such as previous academic records, medical records, proof of residency or other documentation. Separated from public schools are identified and accorded equal access to appropriate secondary education and support services, including by identifying and removing barriers that prevent youths described in this clause from receiving appropriate credit for full or partial coursework satisfactorily completed while attending a prior school, in accordance with state, local and school policies.
- The student shall also have the rights of to all appropriate educational services, transportation, free meals, and Title I services while the dispute is pending.

#### Free meals

Hunger and poor nutrition are obvious barriers to learning. To help ensure that children and youth experiencing homelessness are ready to learn, the U.S. Department of Agriculture (USDA) has determined that all children and youth experiencing homelessness are automatically eligible for free meals on the first day of enrollment. The USDA guidance is available at <a href="http://www.naehcy.org/dl/usda\_04\_04\_02.pdf">http://www.naehcy.org/dl/usda\_04\_04\_02.pdf</a> Hunger and poor nutrition are obvious barriers to learning.

#### Title I, Part A

Children and youth experiencing homelessness are automatically eligible for Title I, Part A services, regardless of the school they attend. The trauma and instability of homelessness puts students at sufficient risk of academic regression to warrant additional support.

The district shall reserve such funds as are necessary to provide services comparable to those provided to Title I, Part A students to children and youth experiencing homelessness attending non- participating schools ACSSs must establish their own methods for setting aside Title I, Part A, funds for homeless students who are not attending Title I schools. Determining an appropriate amount requires coordination between the ACSS Title I and homeless education programs. For information on calculating the mandatory set-aside, visit <a href="www.serve.org/nche/downloads/calculating-setasides.pdf">www.serve.org/nche/downloads/calculating-setasides.pdf</a>. Reserved funds will be used to provide educationally related support services, both in school and outside of school, and to remove barriers that prevent regular attendance.

# **Training**

In monitoring the policies and procedures to implement the McKinney-Vento Homeless Assistance Act, Appling County's homeless liaison will train school counselors, enrollment personnel, including but not limited to administrators, registrars, teachers, social workers, counselors, bus drivers, custodians, community service providers, and social service personnel at the beginning of each school year on possible indicators of homelessness, sensitivity in identifying families and youth who are experiencing

homelessness, and procedures for forwarding information indicating homelessness to the liaison. After the beginning of the year training in August, each school counselor will return to their respective schools and redeliver the McKinney-Vento Homeless Education training to all school personnel including principals, teachers, and paraprofessionals. The trainings and activities will be designed to increase staff awareness of homelessness, facilitate immediate enrollment, ensure compliance with McKinney-Vento law, and increase sensitivity to the unique needs of homeless children and youth. Documentation of training agendas, copies of training materials, and sign in sheets of each training will be collected by the homeless liaison.

#### Coordination

Homeless students and their families often need housing assistance, social services, and health care. Linking families with community resources can have a positive impact on the education of children.

Title I, Part A, requires targeted assistance programs to coordinate with Federal, state, and local service programs, including programs for housing, nutrition, violence prevention, Head Start, adult education, vocational and technical education, and job training. [20 UCS 63159(c)(1)(H)]

#### **Preschool**

Preschool education is a very important element of later academic success. Children experiencing homelessness have experienced many difficulties accessing preschool opportunities. To facilitate preschool enrollment and attendance, the provisions of this policy will apply to preschools. Appling County should ensure that children experiencing homelessness receive priority enrollment in preschool programs operated by Appling County, including exempting children experiencing homelessness from waiting lists. Children experiencing homelessness with disabilities will be referred for preschool services under the Individuals with Individuals with Disabilities Education Act (IDEA). Children experiencing homelessness under age three will be referred for at-risk services under Title VI, Part C of IDEA and screened to determine if referrals for additional Title VI, Part C of IDEA services are appropriate. The ACSS homeless liaison will collaborate with Head Start and other preschool programs to ensure that children experiencing homelessness have access to those programs.

#### References

- The McKinney-Vento Homeless Assistance Act, 42 U.S.C. §§11431 11436
- Title I, Part A of the Elementary and Secondary Education Act, 20 U.S.C. §§6311 – 6315
- The Individuals with Disabilities Education Act, 20 U.S.C. §§1400 et seq
- April 6, 2002 Policy of the Child Nutrition District of the U.S. Department of Agriculture
- June 5, 1992 Policy of the Administration for Children and Families Department of Health and Human Services

# **SECTION 22: SERVICES FOR FOSTER CARE CHILDREN**

The Georgia Department of Education (Department) is required to ensure the educational stability of children in foster care. (ESEA section 1111 (g) (1) (E)). In coordination with state and tribal child welfare agencies, the Department must ensure that the ACSS implements the Title 1 educational stability requirements for children in foster care, including ensuring that:

- A child in foster care remains in his or her school of origin, unless it is determined that remaining in the school of origin is not in that child's best interest;
- If it is not in the child's best interest to stay in his or her school of origin' the child is immediately enrolled in the new school even if the child is unable to produce records normally required for enrollment; and.
- That the new (enrolling) school immediately contacts the school of origin t obtain relevant academic and other records. (ESEA section 111 (g)(1)(E)(i)-(iii)). In fulfilling this role, the SEA should coordinate with the state or tribal child welfare agency to develop and disseminate uniform guidelines for implementing the Title 1 educational stability provisions. Developing uniform statewide policies and procedures for ensuring educational stability for children in foster care, as many States have already done under the Fostering Connections Act, will facilitate successful implantation the local level. This is particularly important given the shared agency responsibility for educational stability under Title I and the Fostering Connections Act, multiple partner agencies in implementing these provisions.

Additionally, the SEA must conduct regular monitoring and oversight to guarantee appropriate implementation of these provisions at the local level. (See 2 C.F.R. 2003.331 (d), 200.328(a); 34 C.F.R 76.770).

On the state level, the Georgia Department of Human Services (DHS) which houses the Division of Family and Children Services (DFCS) periodically sends a list of children in foster care that are flagged on the local level, ACSS will be notified directly by foster parents Court Appointed Special Advocate, DFCS case workers or Educational Support Monitors (ESM, within the Educational Programming, Assessments and Consultation (EPAC) unit of DFCS. Once identified, ACSS must implement its plan to ensure educational stability for children in are. For the best interest of the children in care, ACSS should follow all mandated regulations under FERPA and keep the status of these children confidential.

As a result, the Department is requiring all ACSS, including virtual schools and charter schools that function as an LEA, to complete a Foster Care Transportation Plan. The plan should be completed in addition to the development and implementation of written transportation procedures and the identification of a Foster Cate Point of Contact. Please complete this plan and return it by: Monday, July 31, 2017 Instructions for submission:

- After the ACSS superintendent signs the assurance, scan the entire document as a PDF and save it as the "FY23 Foster Care Transportation Plan"
- Access the Consolidated Application for FY23
- Go to the Planning tab and navigate to the below Attachment tab.
- Upload the signed PDF version of the document

## I. Foster Care Transportation Plan: PLANNING

- A. The Appling County School System's (ACSS) role is to have a transportation plan in place for children in foster care to their school of origin. Describe your plan to:
  - 1. Coordinate transportation with the local child welfare agency
  - 2. Implement steps to be taken if additional cost are incurred.
  - 3. Execute the local dispute resolution process.

Include the roles of the key players (e.g. ACSS Foster Care Point of Contact, ACSS Superintendent, ACSS Federal Program Director, EPAU Unit Education Support Monitor, Case Worker, Court Appointed Special Advocate, Juvenile Court representative, etc.) *Please limit the response to 1,000 characters.*Student Services Coordinator, Transportation Director, Title I/Homeless Liaison, SSCM, Ed. Supp. Mon, Foster Parents, and Court Appointed Special Advocates (CASA)-Special Ed.Director. When transportation is an issue, the listed parties will collaborate to develop a transportation plan that meets the needs of the individual child. "No cost plans" will be explored first and may include the following: 1.Foster parent will agree to transport the child to school of origin (w/in 25 miles roundtrip). 2.Foster parent transports child to nearest school transportation pick up location. 3.ACSS & Spec Ed director will follow existing plan for transporting child with disabilities when the foster child is disabled. Key players will coodinate detailed transportation arrangements for the child. If added cost for transportation incur, all parties will agree on a plan that best fits the needs of student. Key players will handle any disputes.

B. What step should the ACSS and local child welfare agency take to ensure the transportation is provided immediately, even if they face difficulty reaching agreement on how to pay for additional transportation costs? Please limit the response to 1,000 characters.

Once enrolled in ACSS, all students within the boundaries of Appling County are provided free transportation to and from school daily. The ACSS and SSCM will work collaboratively to ensure that transportation is not a barrier to the educational stability of children in Foster Care. The partners will follow the steps outlined below if they are faced with difficulty reaching an agreement on how to pay for additional transportation cost. As stated in Section A, it is pre-determined that all parties will collaborate to develop a transportation plan that meets the needs of the individual child. 1. The transportation plan will implement the lowest level of cost between SSCM, Educational Support Monitor, Student Services Coordinator, Transportation Director, Title I/Homeless Liaison Director, Foster Parent, and CASA 2. Final determination of how to pay for additioanl cost will be made by key players.

C. The ACSS must designate a Foster Care Point of Contact that coordinates with the local child welfare agency. Describe the point of contact's role and responsibilities. *Please limit to 1,000 characters* 

The Student Services Coordinator will serve as the Foster Care Point of Contact. The POC will work collaboratively with the Foster Care Case Worker, Educational Support Monitor, and the foster parent(s) to ensure a smooth and timely impleImentation process with provisions outlined in ESSA to included: thoughtful best interest determinations; appropriate and timely transportation plans for those students placed outside of the zone of their school of origin; and immediate enrollment and record transfer. In addition, the Student Services Coordinator POC will ensure monitoring of attendance of foster children enrolled in the ACSS.

# II. Foster Care Transportation Plan: GUIDING QUESTIONS

- D. If a child is placed within the ACSS attendance area and projected transportation cost are negligible, transportation should be immediately provided without supplemental assistance from the local child welfare agency. If there are additional costs incurred in providing transportation to maintain children in foster care in their schools of origin, the ACSS will provide transportation to the school of origin of:
  - 1. The local child welfare agency agrees to reimburse the ACSS for the cost of such transportation N/A
  - 2. The ACSS agrees to pay for the cost of such transportation- N/A
  - 3. The ACSS and local child welfare agency agree to share the cost of such transportation. YES

Describe the agreement the ACSS has made with the local child welfare agency regarding transportation costs. *Please limit the response to 1,000 character*. All students enrolled in the Appling County School System are provided free bus transportation and is a service available to all families within our county boundaries. Foster Care students who relocate to Appling County are provided the same service. In the event that the best determination for the child is to remain in their school of origin, a procedure is in place and ready to implement even when extra cost are incurred.

E. ACSS must meet the requirements to provide for children who are in foster care to their schools of origin (Similar to the McKinney- Vento requirements for students experiencing homelessness). Does ACSS currently provide transportation services? If no, describe your plan to meet this mandate. - Yes

# SECTION 23: SERVICES FOR NEGLECTED AND DELINQUENT CHILDREN/ PREVENTION AND INTEREVENTION PROGRAMS FOR CHILDREN WHO ARE NEGLECTED, DELINQUENT, OR AT-RISK (Title I, Part D, Subpart 2 Grantees)

The purposes of Title I, Part D, are to: (1) improve educational services for children and youth in local and State institutions for neglected or delinquent children and youth so that they have the opportunity to meet the same challenging State academic content and State student achievement standards that all children in the State are expected to meet; (2) provide these children with services to enable them to transition successfully from institutionalization to further schooling or employment; and (3) prevent at-risk youth from dropping out of school as well as to provide dropouts and children and youth returning from correctional facilities or institutions for neglected or delinquent children and youth, with a support system to ensure their continued education.

The U.S. Department of Education determines the Title I, Part D set-aside amount based on the neglected child count derived from the N/D Annual Survey. ACSS uses the entire Title I, Part A Neglected, Delinquent and At-Risk set-aside for neglected children at Georgia Baptist Children's Home. These children are placed in this facility by the court system and are automatically eligible for Title I services. ACSS consults with this N/D facility located in the district's school attendance area to determine needs and develop a plan for supplementary services for the children residing in the facilities. The expectation of the plan is that in a reasonable amount of time, the neglected children receiving supplementary services will demonstrate meaningful learning gains.

An annual consultation meeting is held with program directors from all GaDOE approved Neglected and Delinquent Facilities in the Appling County's attendance areas. During the meeting, information is shared about the N/D program requirements, budget, services, and resources to support students housed in the facilities. Program Directors identify their program needs and develop plans for supporting students throughout the year. The primary support requested by the facilities includes tutoring, technology (computers), instructional materials and supplies for students.

Federal Programs Director conducts routine consultation visits to the N/D facilities to monitor program services, check inventory and provide technical assistance to ensure compliance with Title I, Part D requirements. Purchases made with Title I funds are inventoried. Equipment is decaled and kept on inventory both at the facility and in the office of the Federal Programs Director Additionally; ACSS' Parent and Family Engagement Plan includes a statement that the residential facilities in its school attendance area are included in the Parent and Family Engagement correspondence and activities. If students are being educated at an N/D facility, then the facility must have a Parent and Family Engagement Plan, correspondence, and activities to the extent

order to increase student achievement and, if appropriate, decrease delinquent behavior.	feasible. A	CSS ensures th	at a Parent a	ınd Family E	ingagement	Plan is imple	emented in
	order to inc	rease student a	chievement a	nd, if approp	riate, decrea	se delinquen	t behavior.

# SECTION 24: PRE-KINDERGARTEN PROGRAMS Pre-kindergarten programs are not funded by Title I; however, the Federal Programs

Pre-kindergarten programs are not funded by Title I; however, the Federal Programs Director and/or the Federal Programs Director meets with the pre-kindergarten principals to discuss early literacy and transition needs. Meetings are also held with the Director and area Headstart/daycare representatives to discuss potential concerns/needs of the current Headstart/daycare as related to curriculum expectations and transitions. No funds are specifically allocated to this program.

# **SECTION 25: PRIVATE SCHOOLS**

#### **Identification of Private Schools:**

The Federal Programs Director reviews DE1111 records and non-profit status of private schools in order to send invitations to private schools for initial consultation to participate in all federal programs. Invitations are sent in the fall/September/October of each year and when grant opportunities become available during the year. The SLDS platform E4SSs is used to send invitations as well as personal visits are made to private schools as necessary based on the grant opportunities that are made available during the school year. Private schools are invited to attend a meeting with all Federal Program directors. A meeting is held, usually in the months of October or November, to present information about the programs available to students in private schools. Equitable services would be provided to any qualifying private schools that choose to participate in the federal programs. As of this school year, FY23, no private schools have chosen to participate.

## **Procedure to Include Private Schools:**

In the event that a Private School chooses to participate, then ongoing consultation meetings dates with representatives of private schools will be scheduled before ACSS makes any decision that affects the opportunities of students attending private schools to participate in programs available and allow private schools to develop plans for implementation. A goal of the ongoing consultation meeting besides from reaching agreements regarding the provision of equitable services, will be for both ACSS and private Schools to reach an agreement to develop plans for implementation, on how to provide equitable and effective programs for students attending private schools, confirm plans are being executed as designed and verify that services occurred as planned and were equitable in nature. Also, taking into consideration the needs of private school students, teachers and leaders, type of services that can be offered, timelines, personnel responsible, and effectiveness of services. The needs of private school students, teachers and leaders will be discussed during consultation meetings in relation to the amount of funds available to support the equitable services that will be provided to address the specific needs of student enrolled in the private school. Both private schools and ACSS will determine how the services will be academically assessed and how the results of that assessment will be used to improve services. Monitoring will be an integral topic during the ongoing consultation. ACSS in consultation with the private school will provide to the private school, the process that ACSS will use to monitor the implementation of federal programs, including control and inventory of equipment and supplies which will follow ACSS inventory procedures. There will be requirements of the private school to self-monitor evaluation of services received from ACSS as well as ensuring appropriate use of equipment and supplies. Ongoing consultation will take place during the school year to ensure compliance from both ACSS and private schools and to ensure that equitable services are being provided to newly enrolled private school students. Both parties will have an understanding that the collaboration and ongoing consultation will be vital to ensure that any disagreements will be address in order to provide equitable services to address the needs of private school students.

Invitations for private schools to consult in participation in federal programs the following calendar year are sent in the fall, usually October, via receipt delivery/ES4PS (in the case of any new grants, ACSS follows the recommendations to send out invitations outside of the regular fall period) Upon receipt of the intent to participate/response on ES4PS, a meeting is held to present information about the programs available to students in private schools. Appling has had no private schools that have chosen to participate. Documentation on file: Invitations, agendas, and minutes.

These procedures would be used for eligible students at any Private School that chose to participate:

- Meetings would then be scheduled on-going consultation every two months to discuss the progress and process of these services. All program directors involved would be part of these meetings.
- Private school students would receive their proportional share of services via the per pupil allocations and required equitable services amounts.
- Eligibility criteria would be used to determine the students who are most in need of services.
- Tutors, either from the school system or through contracted services, would review
  the data from the assessments or serve students in those areas. Timesheets
  would be used for documentation of services and payment.
- Professional learning would occur through invitations from the Title II director and reading instruction videos/learning focused strategy books. Parents would also be invited to district parent and family engagement activities and instructional/parenting information would be mailed directly to those parents.
- Inventory, supervision of services, and collaborative meeting would be handled in the same manner and timeline as any other school in ACSS.

# SECTION 26: TITLE I, PART C- MIGRANT EDUCATION PROGRAM

The ACSS Migrant Education Program ensures that migrant participants fully benefit form the same public education provided to other children by supporting high-quality and compressive educational programs. Collaboration between federal programs and school administration removes barriers to any educational disruptions, enrollment, opportunities in meeting the same challenging state academic content and student academic achievement standards that all children are expected to meet, effective academic opportunities as well as supplemental services, and difficulties in meeting graduation requirements.

#### **Identification and Recruitment:**

Identification and recruitment of potential migrant students is an ongoing activity in the ACSS. The main form of identification of potential migrant students is through the School Residency and Occupational Survey. This form is included in all ACSS registration packets. Once the School Residency and Occupational Survey is returned to the schools, the receiving/receptionist/data clerks sends it to the district office. The Federal Programs Director reviews every School Residency and Occupational Survey. Based on the information provided on the School Residency and Occupational Survey, the forms requiring additional follow-up are saved/uploaded to the Q-drive for the MSSP to contact the families. All School Residency and Occupational Surveys that have been saved/uploaded to the Q-drive are returned back to the Federal Programs Director with notes on the outcome of the interview/contact information. COEs completed on eligible children are sent to Region 2 Migrant Education Agency who makes a final determination of the migrant status.

Recruitment initiated by the information provided on the School Residency and Occupational Survey is the main form of access to children enrolled in school. OSY and P3-P4 students are identified via various types of referrals, collaboration with community organizations and visits to housing units in the county.

In general, ACSS implements the following activities for effective and ongoing ID&R:

- Appling County complies with the federal and state ID&R guidelines and standards.
- A local annual ID&R plan is developed and reviewed by MEP personnel.
- All staff attends required trainings on ID&R.
- All Appling County Migrant paid staff has been certified above the minimum
   Novice Level.
- Appling County strives for a 100% COE/eligibility accuracy rate.
- Staff who are certified to complete COEs are observed by Regional Recruiters at least three times per year.
- Every Friday during the regular school year and all month of June, migrant paid staff conducts ID&R activities.

- Weekly schedules and travel of ID&R activities are available for future ID&R documentation.
- Eligibility interviews are held in the dominant language of the interviewee.
- Overtime is available to MSSP's in order to accommodate periods of high worker influx and the parent's daily work day/shift.
- Appling County's Migrant Program is active within the community. This
  network enables for identification and recruitment of OSY/DO and pre-school
  children who are never identified by the schools through the Student
  Residency and Occupational Survey.

#### **Records Maintenance and Transfer:**

The Federal Programs Director and the designated MSSPs downloads monthly records that are available through the GaDOE portal. This information is shared and verified with the District FTE Coordinator to ensure that the new participant(s) are appropriately coded as migrant in the system, which in Appling County; the Federal Programs Director and the designated MSSPs have the authorization to update this information on Infinite Campus, as needed and requested to ensure that this process is completed in a timely manner. The same information received on the portal is accessible to the designated MSSP's in the system. If student's information from DOE is different from the system. corrections are made to the report and mailed back to Region 2 for information to be changed and for the data on both the system and DOE to be uniform. In turn, MSSP's sign their form and turn in a copy to Federal Programs Director for verification purposes that their local school files have been updated with the new information. Friday mornings, as needed, all migrant paid staff meets to discuss any updates, complete, receive and return any information that needs to be submitted to Region 2. Templates that are provided on the portal are used to communicate to parents any information related to their child. All reports are dated when are received by the system and mailed to Region 2 to ensure that communication between the district and Region 2 is completed in a timely manner and that due dates are met. MSIX is utilized to help with ID&R for incoming and departing families. Primarily searching for new family's prior migrant status and using current information during the interview and COE completion. MSIX notification systems. alerts new families that are moving into the ACSS, and family's departing's new location. The information in MSIX also provides an overview of student's history that allows for a quicker school registration process.

# **Priority for Service:**

Title I, Part C, ESEA, Section 1304(d) requires states to give "priority for services" to migrant children:

- 1. Who are either failing, or are at risk of failing the state's challenging academic content and achievement standards, and
- 2. Whose education has been interrupted during the regular school year in the preceding 12 months.

<u>Both</u> of these conditions must exist simultaneously for a migrant child to have "priority for services."

The GaDOE has determined that the following indicators shall be used to identify the migrant children who should receive Priority for Services.

#### **FAILING**

- Scored below established proficiency level on one or more of the Georgia Testing Program assessments (GKIDS, GMS, Grades 3 & 5 Writing Assessments, MGWA, GHSGT, GHSWT, EOCT, EIP) or other state's required statewide assessments during the past consecutive 12 months (documentation or score(s) must be in a student's school records)
- During most recent and/or current semester has failing grades (70 for EL) in one or more core academic content areas (K-8) or course(s) required for graduation (9-12)
- AT RISK FOR FAILING
- Working at grade level BELOW grade placement
- Is over age for grade placement by one or more years (has been retained, started school late, under schooled, etc.)
- Is identified as an English Language Learner (EL)
- Has insufficient credits for promotion or graduation
- EDUCATION INTERRUPTION
- In the preceding 12 months, changed school districts during the regular school year.

Each time Region 2 provides a list of students who have been identified as PFS, this report is provided to all MSSP's to ensure that all PFS students are being served first before any non PFS student. Teachers receive notification that these students have been identified as PFS. If any PFS student is not already in the schedule to receive services, then schedules are modified for all PFS students to receive MEP-Funded services. PFS students, who are performing academically and are not in need of tutoring services, are listed at the bottom of the MSSP's schedule. Notification of PFS students is provided by MSSP to teachers and administrators at the beginning of each year and semester. In addition, updates are provided by MSSP to teachers and administrators as students are identified and schedules are modified. This ensures that MSSP's continue to verify the student's grades, absenteeism and any other support service that may be needed by the student. PFS students are given priority to participate in all MEP-funded services before any non-PFS student.

# **Comprehensive Needs Assessment:**

Georgia Department of Education, Migrant Education, conducts an annual Comprehensive Needs Assessment. Appling County School System reviews this information and includes it on the results that are obtained from annual surveys completed by parents, students, teachers and administrators. The results, along with state

mandated tests and attendance are reviewed annually by a CNA committee. The CNA committee reviews the data and determines the gaps that need to be addressed through implementation plans which will provide supplemental services. A meeting is held for parents and stakeholders to approve the implementation plans. The implementation plans are then submitted to Region 2, for approval. Once approved, Implementation Plans are included in the budget for final expense approval. These implementation plans include all eligible migrant students enrolled identified in Appling County which includes in school, eligible migrant P3-P5, drop outs and Out-of-School Youth.

#### **Migrant Services Coordination:**

Title I, Part A funds in conjunction with other federal, state and local funds are used to coordinate and integrate education services in all Title I schools and GBCH, an N&D Facility, and to every student in the system. Funds are used based on eligible criteria set by its funding source, and coordinated using comprehensive needs assessments, CEP, identification criteria, Pre-K enrollment, stakeholder's input and system survey. In addition, the system will continue to implement the GaDOE's School Improvement Plan which includes a detailed description on the coordination of all federal, state, and local resources in the delivery of educational programs to each individual school. Collaboration between Title I, Part A and IDEA.

The following is a list of the federal, state, and local services and programs that are being coordinated and integrated in FY23

- State Extended 20 Day Funds
- QBE Grade Level Funds
- Early Intervention Program
- Special Education
- Gifted
- Homeless
- Professional Learning Funds
- All Federal Funds received by ACSS

Program Coordinators, Federal Programs Director, and Directors of Curriculum, Special Education, Testing, Title III, and Migrant Education collaborate to increase student achievement and the unique needs of migrant students.

Efforts are coordinated for services and may include the following: Appling Community Connection, GLRS, Head Start, Telamon, HEP/CAMP, GSU, Goizueta Foundation, Appling County Concerted Services, Mexican Consulate, Migrant Education Program of Mexico, Coastal Pines Technical College, GaDOE/MEP Region 2, Department of Juvenile Justice, DFCS, Appling County Sheriff's Office, Appling County Police Department, Babies Can't Wait, Georgia Network for Educational and Therapeutic Supports, Georgia School for the Deaf, and Georgia School for the Blind.

# Parent and family engagement/PAC:

The Parent Advisory Council is an integral component of the Migrant Education Program in the ACSS. In an effort to collaborate with parents of eligible migrant students, the MEP schedules three PAC meetings per school year. When available and due to the mobility

of parents, ACSS makes every effort to have PAC officer representation during the PAC meetings. The strong partnership between MEP and parents ensures parents to be actively involved with their children's academic success. ACSS has a strong Parent and family engagement Program/PAC representation who are very active in the migrant education decision making process. Parents are active stakeholders in the CLIP Process. The Parent Advisory Councils meetings are held at the beginning of the school year, Winter and Spring.

During the winter PAC meeting, parents complete a survey that cover main topics related to the CLIP, MEP funds, parent workshops, and parent's perceptions on their child's academic needs are included in the survey. Collected information is included in the CLIP and to the extent possible activities are addressed during the school year. All communications, invitations/flyers, agendas, minutes and to the extent possible handouts are provided in Spanish and English. Parents are asked at the beginning of each meeting if they would prefer for the meetings to be carried out in Spanish, English or translations thought out the meeting. The majority of the time, parents prefer for the meetings to be carried out all in Spanish. ACSS CLIP newspapers invitations, website invitations, agendas are provided in Spanish and English. Translation for parents of eligible migrant students is available during ACSS CLIP meetings.

# **Professional Development:**

ACSS promotes ongoing, professional development opportunities, as needed. MSSPs will be given opportunities to participate in all professional learning sessions throughout the year. Region 2 Migrant Education Agency provides ongoing professional development for the MSSP and provides documentation of attendance. The MSSPs are also encouraged and given the opportunity to participate in professional learning that is provided to all other school personnel. MSSPs are invited to district level professional development trainings that relates to the CLIP, data disaggregation and benchmark implementation.

# **Early Childhood Education:**

Every P3-P5 who is not enrolled in any educational program is given the opportunity to be served with school readiness curriculum via home visits. Parents are contacted via letters, phone calls, and/or home visits of all the services available to their children. Parents who agree to receive services via home visits are scheduled for Fridays. P3-P5 children are provided with school readiness services. In the event that parents may be working out of town, the MSSP provides materials with instructions and follows up with phone calls. ACSS offers summer school every eligible migrant student in the district. A large number of P3-P5 participate in the 3-week long summer program taught by PK teachers with experience in this age group.

MSSP's assist with Pre-K announcements, registration, and enrollment process. Pre-K migrant students are served via Pre-K. Collaboration between MEP and Pre-K Director ensures that registrations of P3-P5 participants are addressed before regular school starts. MSSP's provide support services as needed and requested by the Pre-K Director

and/or Principal in order for eligible migrant students to continue enrollment in the Pre-K Program.

#### **Program Evaluation:**

An evaluation summary is completed at the end of the school year. The evaluation summary includes demographic information, PFS data, benchmark data and/or state assessment data. The summary along with survey information collected for the CLIP, provides key elements for Implementation Plans. Implementation Plans are evaluated at the end of the school year, summer school or program implementation. Consistent evaluation of services to participants is required due to the mobility life style of participants, grades, absences, benchmark data, student observation, parent's concerns and/or teachers' request/comments. Modification of tutoring schedules and support services is ongoing throughout the school year. As a result, the evaluation process is continuum to provide the most effective services to all eligible migrant students. Parents input is surveyed in order to collect information on how parents perceive services that are being provided to their children and how the information provided during PAC meetings are effective in increasing parent and family engagement and parent involvement in the education process of migrant participants.

#### **Use of Title I, Part C Funds:**

The Migrant Education Program in ACSS supports comprehensive educational programs for eligible migrant participants. The support is aimed at reducing educational disruptions and other unique problems and barriers participants face due to their mobility situation. In ACSS, Title I, Part C funds are used to pay the salaries and expenses of the MSSPs and contracted services personnel. Funds are also used for the cost of support services fees, supplemental materials, and implementation of Implementation Plans. Collaboration between all federal programs and school administrations ensures that eligible migrant participants are included in all services provided by the Appling County schools for which they qualify, including but not limited to after school tutoring, intercessions, EIP, EL, special education, extra-curricular activities, summer school, gifted and scholarship opportunities.

# SECTION 27: TITLE II, PART A-(Effective FY21, 100% Funds were transferred to TITLE I, PART A

The purpose of Title II, Part A includes the following:

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

#### <u>Inventory</u>

Title II, Part A funds have been transferred to Title I, Part A effective FY21 School Year. The following information is kept in this manual since there is still inventory in the district that belongs to Title II, Part A. Title II, Part A: Documentation of physical inventories will be maintained by the Federal Programs Director at the Board of Education. Principals receive a copy of the "Purchasing Supplies or Instructional Materials" and "Electronic Devices" section in the Use of Funds and Budget Management section of the Title IIA Handbook. This information is reviewed with principals each year. Equipment purchased with Title IIA funds will only be used for professional learning activities allowable under Title II, Part A or in the administration of the Title II, Part A program. Physical inventories will be conducted by the designated person by the principal. The person conducting the physical inventory and the principal will sign off on the inventory documentation/checklist submitted to the BOE office. For any equipment located at the central office, physical inventories will be conducted and documentation signed by the Federal Programs Director. Signed documentation will include physical location and documentation of authorized use of equipment for Title II, Part A purposes. Title II, Part A: Documentation of physical inventories will be maintained by the Federal Programs Director at the Board of Education. Federal Programs Director spot checks inventory to ensure quality control of inventory. This inventory will be conducted once per year; and, documentation will be maintained at the central office.

# **SECTION 28: TITLE III, PART A & ESOL**

#### Overview:

Title III of the Elementary and Secondary Education Act of 1965, as amended by the Every Student Succeeds Act by Public Law 114-95 in December 15, 20215, was established with the intent and purpose that children and youth who are English learners (ELs) attain English language proficiency (ELP), develop high levels of academic achievement in English, and meet the same challenging state academic content standards all students are expected to meet.

These procedures are intended to provide an overview on the processes ACSS follows to supplemental federal funds received from Title III, Part A Language Programs. Title III, Part A funds will be used to provide an effective supplemental language program that improves the English language proficiency and academic achievement of English learners through the provision of an additional or enhanced language instruction educational program (LIEP), sustained and effective professional learning activities that increase the knowledge and skills of teachers and administrators who serve ELs, and effective language-focused outreach activities for EL families, parents and communities to enhance and supplement the school system's LIEP. All services provided to ELs using Title III, Part A funds will supplement, and not supplant, the services that must be provided to EL students under Title VI of the Civil Rights Act of 1964 (Title VI), the Equal Educational Opportunities Act of 1974 (EEOA), and other requirements, including those under State or local laws.

English to Speakers of Other Languages (ESOL) is the state-funded instructional program for eligible English Learners (ELs) in grades K-12 (Georgia School Law Code 1981, § 20-2-156, enacted in 1985). The ESOL program is a standards-based curriculum emphasizing academic and social language development. ESOL coursework is based upon the World Class Instructional Design and Assessment (WIDA) Consortium and English Language Development (ELD) standards. Both ESOL & regular classroom teachers integrate these ELD standards with the Georgia Standards of Excellence to enable ELs to both communicate in English and demonstrate their academic, social, and cultural proficiency. Instructional approaches, both in ESOL and general education classes, ensure meeting the needs of ELs in the district to increase both English language proficiency (ELP) and academic language proficiency in content-are subject matter.

ACSS provides ELs with effective English language development instruction using state (ESOL QBE/FTE) and/or local funding as required under Title VI of the Civil Rights Act of 1964 and the EEOA. In addition, ACSS ensures that ELs participate meaningfully and equally in educational programs and services provided in the district. All ESOL teachers meet the ACSS PQ requirements. The delivery model offered to all ESOL students is push-in and pull-out model.

ACSS ensures to meet the state/local obligations under Title VI and the EEOA and funds the ten obligations with state or local funds:

- 1. Identify and assess all potential English learners in a timely, valid, and reliable manner.
- 2. Provide English learners with a language assistance program that is educationally sound and proven successful, consistent with *Castañeda v. Pickard* and the Supreme Court decision in *Lau v. Nichols*. <sup>3</sup>
- 3. Provide sufficiently well-prepared and trained staff to support the language assistance programs for English learners.
- 4. Ensure that English learners have equal opportunities to meaningfully participate in all curricular and extracurricular activities.
- 5. Avoid unnecessary segregation of EL students.
- 6. Ensure that English learners who have or are suspected of having a disability under the Individuals with Disabilities Education Act (IDEA) or Section 504 of the Rehabilitation Act of 1973 are identified, located, and evaluated in a timely manner and that the language needs of students who need special education and disability related services because of their disability are considered in evaluations and delivery of services.
- 7. Meet the needs of English learners who opt out of language assistance programs.
- 8. Monitor and evaluate English learners in language assistance programs to ensure their progress with respect to acquiring English proficiency and grade level content knowledge, exit ELs from language assistance programs when they are proficient in English, and monitor exited students to ensure they were not prematurely exited and that any academic deficits incurred in the language assistance program have been remedied.
- 9. Evaluate the effectiveness of a school district's language assistance program(s) to ensure that ELs in each program acquire English proficiency and that each program is reasonably calculated<sup>3</sup> to allow ELs to attain parity of participation in the standard instructional program within a reasonable period of time.
- 10. Ensure meaningful communication with limited English proficient (LEP) parents.

#### <u>Implementation and Monitoring of EL Entrance Procedures</u>

The Federal Programs Director collaborates throughout the school year with all ESOL Teachers in the county to ensure that any communication from the GaDOE is passed on to the teachers. At the beginning of the school year, a meeting is held to review all the processes that will be implemented, updated and planned throughout the school year. All forms that will be housed in the Q-drive and/or infinite campus are reviewed and approved. This process allows for the Federal Programs Director to personally be involved in the everyday activities that are held at each school, the implementation of procedures is consistent across the district, monitor the identification, services and exit criteria of ELs, monitor supplemental language instruction, professional learning, and parent and family community outreach programs. The Federal Programs Director in

collaboration with ESOL Teachers review the Federal Programs Manual, new forms, Professional Learning, and plans for the use of any Title III, Part A funds that may be available for the year. Teachers submit schedules to ensure that all ELs are being served and to ensure that sufficient staff is available in all schools. During face to face technical visits, school principals are given an overview of Title III, Part A, ESOL, Title VI of the Civil Rights Act of 1964, and ESOL to ensure that students are provided with the required and supplemental services, ESOL teachers are given the same resources as any other teachers in the school district, and that entrance and exit procedures for identifying English learners and immigrant children and youth are followed consistently in the school district. The CLIP is used as the main means to secure supplemental services to ELs and outreach opportunities to their parents. Supplemental Language Instruction is monitored by scores on pre and post benchmark data. Professional Development is evaluated by feedback surveys, walkthroughs and observation checklist. EL Parent/family, community outreach is evaluated by annual surveys provided in Spanish and English.

#### **Identification of English Learners**

Under federal law, ACSS identifies all students with primary home languages other than English using the Home Language Survey (HLS) and screens these students for language assistance if certain indicators are checked on the HSL. In the event a student is new to U.S. schools, i.e. Kindergarten students and newly arrived immigrants, then the original HLS serves as a trigger to determine which students should be administered the ELP screener to identify whether they are or are not English learners entitled to English language instructional programs.

#### The HLS includes the three required questions:

- 1. Which language does your child best understand and speak?
- 2. Which language does your child most frequently speak at home?
- 3. Which language do adults in your home most frequently use when speaking with your child?

In Appling County, Data Clerks at each school provide a registration packet to all students. New students enrolled in the system are provided with the HLS, one-time document, as part of the enrollment process, to complete and return back to the Data Clerks. The HLS includes a series of questions intended to determine the students' primary language. Teachers complete their designated checklist to ensure that ALL forms that parents are required to complete are turned in to the homeroom/primary teacher. ESOL teachers are also involved in the process in the event that the HLS form is not turned in to the school. Parents may not decline to complete the Home Language Survey. As needed and requested the HLS is in a language the parents can understand. Presently, all HLS are in Spanish and English. If written translations are not practicable, ACSS offers limited English proficient parents' free oral interpretation of the written information. The complete and signed HLS is maintained in the student's permanent/cumulative file. EL records of all transferring students are also used to identify whether the in-state or out-of-state transfer student is an EL or not.

If the answer to any of the questions indicates a home language other than English, the student is considered a Primary Home Language Other Than English (PHLOTE). If the answer to all three questions are several languages, the school must interview the parents to determine what language is the student's primary or dominant language. If the answer to all three questions is English, the student is NOT a potential English learner and should not be administered the ELP screener. Transfer students' original HLS (signed, dated, and in a language, parents understood) and prior EL documents take precedence in this process. American Sign Language (ASL) is an accepted English and would NOT trigger the need to screen the student for English proficiency.

#### The student's primary language will be entered in Infinite Campus:

STUDENT PRIMARY LANGUAGE must be entered if the student is coded EL= 'Y'.

- STUDENT PRIMARY LANGUAGE cannot be BLANK (English) if the student is an ENGLISH LEARNER (EL).
- A STUDENT PRIMARY LANGUAGE is required when the PLACE OF BIRTH code is not the United States (code 2310 U.S. or 1790 Puerto Rico).

#### Parent Language of Communication:

The language preference of the parent for written communication between the school and the family is collected as part of the HLS and is located at the bottom of the form.

#### Transfer Students

Students enrolled in a GA school before ACSS:

Identification of the student as a potential EL will take effect after reviewing:

- Transferring records and/or original HLS
- Original screener of the latest WIDA ACCESS
- Direct contact has been made to the previous school for HLS, screener or testing results.

ELs who transfer from another school within the United States or from a Department of Defense School, with official records to support their pre-determined eligibility and services within the past year, will be accepted and placed accordingly in language assistance programs.

If a PHLOTE was screened in a non-WIDA state and was found not-eligible by that state's criteria, ACSS may rescreen using the appropriate WIDA eligibility assessment if there is evidence that the students' level of English Language Proficiency will be, or is, a barrier to meeting Georgia's Standards of Excellence.

If there is no record available or records cannot be obtained within the time frames described above, it will be necessary for ACSS to ensure that it meets the appropriate deadlines for identification and screening of transfer students.

Based on the language of Title VI and the Lau holding, a foreign exchange student is a "person in the United States," and the Lau provisions would, therefore, apply. If the HLS

responses for a foreign exchange student indicate a primary language other than English, the student will be screened for eligibility for language assistance services.

#### Corrections to HLS:

In the event that a parent reports an incorrect HLS, changes to student's EL=Y status must include the following elements:

- Parent's notification that the HLS was answered incorrectly.
- ACSS will review the parent's request and will ask parent to complete the HLS-Incorrect Addendum.
- Federal Programs Director/Contact Person will approve the new HLS Addendum.
- The School will proceed to make the necessary changes based on the new HLS.
- ACSS will change the status change by giving the code of EL=I code for the remainder of that school year. After the June 30<sup>th</sup> Student Records Sign-off is completed the student will be coded as EL=N
- On that same day a file: Appling.YEAR.TitleIII.EL-I CodeReport will be emailed to GaDOE with the following information:
- ✓ student's name,
- ✓ grade level
- ✓ parent's reason to change the HLS
- √ name of the person approving the HLS
- ✓ former status code
- √ new status code
- ✓ the date status change was effective.

The EL=I code will be used and will trigger an error flag at the end of the year or after the ACCESS testing I.D. tickets have been issued. An explanation will suffice the error. ACSS will only report the student as EL=I for the remainder of that school year. Subsequently, after the EL=I year, the student will be coded as EL=No, even if the student has transferred to another school district.

#### Multilingual-Multiliterate Home Language Environment

In the event that a parent reports two primary home languages, one of which is English, the statewide standardized procedure is to identify this student as a potential English learner and screen him or her for English language proficiency. If the student qualifies for EL status, then the primary home language will be identified as the non-English language, since both primary home languages cannot be simultaneously recorded in the SIS.

In instances ACSS may encounter families who are multilingual-multiliterate and believe their child is developing proficiency in two or more languages concurrently, and therefore, each language is just as "primary" as the other(s). Educational research literature calls these children simultaneous bilinguals or multilinguals to distinguish them from sequential bilinguals/multilinguals. In the event that ACSS encounters students in this situation, the Federal Programs Director will contact GaDOE for guidance and support with the HLS. In the event that a parent of a developing multilingual child feels that the ELP screening process is discriminatory against multilingual-multiliterate families, the parent may request a Multilingual Home Language Survey (MLL HLS)

Amendment. ACSS will follow this amendment to change the student's primary home language code to English. With an English primary home language, the student would not be considered a potential English learner nor would be screened for ELP. Documentation will be place in the student's cumulative folder.

#### **Screening for Eligibility**:

ACSS only uses WIDA Screener scores for EL identification purposes. Annually, all ESOL Teachers apply and receive an Annual WIDA Certification which is required for all certified personnel who will administer the WIDA Screeners in ACSS. Only GaPSC certified personnel who have completed the required WIDA training for the WIDA Screeners are permitted to administer the screener. This annual certification period runs from September 1 – August 30 of every year. All test administrators/examiners who complete for the first time the WIDA Screener Training and Certification in July and August 2022 will have a Certificate of Completion with a July or August 2022 date. This Certificate is valid for WIDA Screener administration for one calendar year. All test administrators/examiners who completed WIDA Screener training and certification after September 1, 2021, will have a valid certification for one calendar year from the date of completion. These teachers will recertify to screen students after September 1, 2022. The Screener training starting September 1, 2022, will be slightly different than the Screener training before September 1, 2022. Certificates of completion are turned in annually to school's testing coordinators.

#### Graphic Steps to initial questions to consider and steps to follow:

Is this the student's firsttime enrolling in a U.S. school?

- 1. Administer the HLS
- 2. If a language other than English is indicated for any of the three state-required questions, the student is a potential English learner.
- 3. Administer the gradelevel appropriate ELP Screener.

(If the potential EL has an established IEP/504 plan, screen with the appropriate accommodations)

Has the student been enrolled in a GA school before?

(In-state transfer)

Identify if the student is an English Learner based on transferring LEA records and/or the original HLS, original screener, or the latest WIDA ACCESS for ELLs assessment.

- 1. Claim the student in GUIDE to see if he has an EL status code in Georgia.
- 2. Check the student's previous enrollment history in SLDS.
- 3. Check the student's records in SLDS to see if

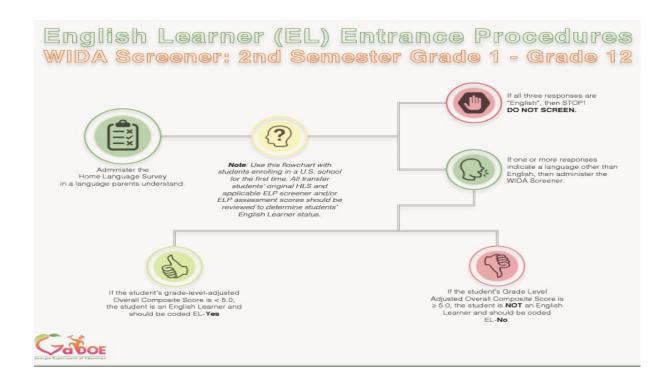
Has the student been enrolled in a U.S. school in another state?

Identify if the student is an English Learner based on transferring LEA records.

- 1. Contact the previous school or LEA and ask for: a. The original Home Language Survey,
- b. Screening documents, and/or
- c. English Language Proficiency (ELP) testing results.
- 2. Contact the previous school or school system again.

- 4. Follow the state ELP screener eligibility criteria to ACCESS test results. Check determine whether the potential EL qualifies for the EL status.
- 5. Code student appropriately in Infinite Campus.
- there are any former prior ACCESS test results against state or LEA entrance/exit criteria for that year.
- 4. When applicable, open the SLDS EL Tab and check to see if student was previously screened.
- 5. Make every effort possible to obtain prior EL records and identify EL status within 30 days of enrollment.

- 3. Contact the previous school or school system again.
- 4. Make every effort possible to obtain prior EL records to determine EL status within 30 days of enrollment.



# Students enrolling for the first time in ACSS:

The grade-level appropriate ELP Screener will be administered (if a potential EL has an established IEP/504 Plan, this will be considered for appropriate accommodations by

collaborating with the SPED Department to establish the proper protocols for each individual student)

- State ELP screener eligibility criteria will be used to determine whether the
  potential EL qualifies for the EL status by using the new WIDA screener of
  Kindergarten see Screener Flowchart or the Grades 1-12 WIDA Screener see
  Screener Flowchart.
- Student will be coded in Infinite Campus.

#### Students enrolling from a GA school--In-state transfer.

Students will be identified as English Learner based on transferring LEA records and/or the original HLS, original screener, or the latest WIDA ACCESS for ELLs assessment. Steps:

- 1. Claim the student in GUIDE to see if he has an EL status code in Georgia.
- 2. Check the student's previous enrollment history in SLDS. Not followed check on this.
- Check the student's records in SLDS to see if there are any former ACCESS test results. Check prior ACCESS test results against state or the transferring school's entrance/exit criteria for that year.
- 4. When applicable, open the SLDS EL Tab and check to see if student was previously screened. Even if the LEA is not using the SLDS EL Tab, it can be opened to see transferring LEA information.
- 5. ACSS makes every effort possible to obtain prior EL records and identify EL status within 30 days of enrollment
- 6. Student will be coded in Infinite Campus if applies.

## Students enrolling from a U.S. school in another state:

Identify if the student is an English Learner based on transferring LEA records. Steps:

Contact the previous school or LEA and ask for:

- a. The original Home Language Survey,
- b. Screening documents, and/or
- c. English Language Proficiency (ELP) testing results.
- d. Contact the previous school or school system again.

Make every effort possible to obtain prior EL records to determine EL status within 30 days of enrollment

Student will be coded in Infinite Campus if applies.

Plan of action to be implemented in FY23. Deadlines and calendar invites will be sent to all ESOL teachers to ensure that student information in IC and SLDS EL tab are updated and/or revised for all new enrolled students.

#### Grade-Appropriate WIDA Screeners & Language Domain Subtests:

Kindergarter	n Screener	Grades 1-12 Screener			
Students enrolling during Kindergarten registration - 1st semester Kindergarten.	Students enrolling in 2 <sup>nd</sup> semester Kindergarten – 1 <sup>st</sup> Semester Grade 1	Students enrolling in the 1st semester of the lowest grade in a grade-level cluster.	Student enrolling in the 2 <sup>nd</sup> semester of the lowest grade in a grade-level cluster.		
Administer only the Listening and Speaking tests of the Screener.	Administer all four language domain tests	Administer a lower grade cluster WIDA Screener. Example: A 4th grader enrolling 1st semester 4th grade will be administered the Grades 2-3 WIDA Screener.	Administer the current grade cluster WIDA Screener.  Example: A 4th grader enrolling 2nd semester 4th grade will be administered the Grades 4-5 WIDA Screener.		

<sup>\*</sup>The new WIDA Kindergarten Screener will be used to identify potential EL students starting with the 2021-2022 Kindergarten class, students enrolling in 1st semester and 2nd semester Kindergarten and in 1st semester Grade 1only.

All cost associated with identification of ELs, including cost of administering a screening assessment, and HLS are the responsibility of ACSS and not of federal funds.

#### **EL Eligibility Criteria:**

#### Kindergarten-1st Semester Grade 1

For students enrolling in 1st Semester Kindergarten:

- 1. Administer only the Listening and Speaking sections of the new WIDA Screener for
- 2. Kindergarten.
- If the student's Oral Language Proficiency (Listening + Speaking) Proficiency Level is < 5.0, the student qualifies and is identified as an English learner and is coded EL=Yes in the Infinite Campus.
- 4. If the student's Oral Language Proficiency (Listening + Speaking) Proficiency Level is ≥ 5.0, the student Does Not Qualify (DNQ) as an English learner and is coded EL=No.

For students enrolling in 2nd semester Kindergarten to 1st semester Grade 1:

- 1. Administer all four components of WIDA Screener for Kindergarten: Listening, Speaking, Reading, and Writing.
- 2. If the student's Overall Composite Proficiency Level score is < 5.0, the student qualifies and is identified as an English Learner and is coded as such in Infinite Campus.
- 3. If the student's Overall Composite Proficiency Level score is ≥ 5.0, the student Does Not Qualify (DNQ) as an English Learner and is coded EL=No.

<sup>\*</sup>The K-WAPT was retired at the end of the 2020-2021 school year and will not be used to screen rising Kindergarten students in Spring 2021 or after.

#### Students in 2nd Semester Grade 1- Grade 12

The WIDA Screener for Grades 1-12 (either online or paper) is the only screener administered to potential EL students enrolling in 2nd semester Grade 1 through 2nd semester Grade 12.

Use the following process and screener results to determine EL eligibility.

- 1. Administer all four language domains of WIDA Screener: Listening, Speaking, Reading, and Writing.
- 2. If the student's Grade Level Adjusted Overall Composite score is < 5.0 on the WIDA Screener, the student qualifies as an English Learner and is coded EL=Yes in Infinite Campus
- 3. If the student's Grade Level Adjusted Overall composite score is ≥ 5.0 on the WIDA Screener, the student does not qualify as an English learner and is coded EL=No in Infinite Campus.

#### Recording Date of ELP Screener & ELP Screener Results

Date of screening will be recorded by Data Clerks in Infinite Campus. The date of ELP Screener will be the testing date a student was screened for the EL program and is determined to be an English Learner (EL = 'Y') student. The date will be in the following format: yyyymmdd.

<u>Transfer Students</u>: For transfer EL students, the date that will be used, will be the date the ELP Screener was administered in the previous LEA. This is NOT the date the EL student enrolls in the LEA's ESOL Language Program.

Transfer EL Students, the LEA will construct this date as follows:

- 1. Determine the school year for which you have the earliest ELP assessment results.
- 2. Use the first day of school for that school year, as the Date of ELP Screener.

When an ELP Screener or ELP assessment is not available for a potential EL student who has transferred from out-of-state, or records cannot be obtained within the federal timeline, it will be necessary for the ACSS to take steps to ensure that it meets the appropriate deadlines for notifying parents of child's placement in a language instruction educational program.

- If a student was screened in a WIDA state and Did Not Qualify (DNQ) as an English Learner, the student may not be screened again at a future date for reconsideration of eligibility without prior state approval. (See list of WIDA states at www.wida.wisc.edu.)
- If a student was screened in a non-WIDA state and Did Not Qualify (DNQ) by that state's eligibility criteria, the LEA <u>may consider rescreening</u> the student using the appropriate WIDA eligibility assessment if there is evidence that the student's level of English language proficiency will be/is a barrier to meeting Georgia's Standards of Excellence.

ACSS will not re-screening when the DNQ non-WIDA transferring student:

- Was screened more than 24 months (or the equivalent of two academic years)
   prior to enrollment in the current LEA; and
- Was enrolled and was successful in the general education program in the previous school; and
- Performed at the met or exceeded level on that State's content assessments (if such assessments were required and administered in the enrolled grades).

#### J-1 Visa, Foreign Exchange Students

According to CFR 22 § 62.10 Program administration, J-Visa student sponsors are responsible to "establish and utilize a method to screen and select prospective exchange visitors to ensure that they are eligible for program participation", and that the foreign exchange visitor "possesses sufficient proficiency in the English language, as determined by an objective measurement of English language proficiency, successfully to participate in his or her program and to function on a day-to-day basis." A sponsor will verify an applicant's English language proficiency through a recognized English language test, by signed documentation from an academic institution or English language school, or through a documented interview conducted by the sponsor either in-person or by videoconferencing, or by telephone if videoconferencing is not a viable option.

Thus, it is expected that all J-1 exchange visitors are proficient enough in English to participate successfully in their exchange program and to function on a day-to-day basis in U.S. schools. ACSS will review each student's individual situation in following statewide, standardized EL Entrance Procedures and possibly provide English language services or not to exchange students once reviewing evidence from sponsors of English proficiency in one of the following ways:

- Results of a recognized English language test
- Signed documentation from an academic institution or English language school A documented interview conducted by the sponsor

Out-of-State errors in Data Collections for missing Date of ELP Screeners will be relievable with explanation

Only K-2 EL administer the ELP assessment are reported based on EL student and Immigrant student reporting requirements under Title III, Part A. [See 34 C.F.R. §200.5(a)(2).]

Students with Identified or Suspected Disabilities that Preclude Screening of One or More Language Domains

The ACSS division of departments and collaborative relationships facilitates the testing of Students with disabilities. Students with disabilities established in an IEP or 504 Plan

whose home or primary language is not English, will be administered the appropriate WIDA ELP Screener with the appropriate accommodations as established in the IEP. Accommodations will be based and documented in the Go-IEP platform.

Even with accommodations, WIDA ELP screeners may not be valid screeners for making EL eligibility determinations for students whose IEP precludes the assessment of one or more language domains. Students who are deaf, blind, and non-verbal would be considered as having a disability that precludes assessment in one or more language domains. Beyond these reasons, the Assessment Director will seek counsel from the GaDOE Assessment Division who would consult with Special Education and EL Learner Programs. Caution will be exercised with potential ELs in Kindergarten, whose ELP screener only assesses two language domains: Listening and Speaking.

To determine whether the student qualifies as an English Learner, the IEP team should be convened to discuss how to determine EL eligibility when one or more language domains are missing. The IEP team's review of all information and data serves as the initial screening process for students whose disability precludes the assessment of one or more language domains. The IEP team should include an ESOL language specialist with experience identifying English learners. The IEP team's EL eligibility decision must be maintained in the student's cumulative record along with evidence supporting the team's decision. If the student cannot be assessed with any portion of the ELP Screener, it is the obligation of the IEP Team to revisit the EL eligibility decision at least annually.

- If the IEP team determines that the administration of the WIDA ELP Screener with
- accommodations are not appropriate to identify this student as an EL, the IEP meeting minutes suffice as documentation of this decision.
- The committee meeting minutes must be maintained in the student's cumulative record along with notes supporting the committee's decision.
- A flag or note could be placed with the Home Language Survey in the permanent record to alert any reviewer to see the IEP minutes dated XXXX for decision regarding screening.
- Student's EL status would be reported to the state in SIS as EL=Yes or EL=No. If this status were to change, an explanation must be included in the Data Collection submissions.

If the student cannot be assessed with any portion of the ELP Screener, it is the obligation of the IEP Team to revisit the EL eligibility decision at least annually

#### Students with Identified Significant Cognitive Disabilities

WIDA ELP screeners may not be valid screeners for making EL eligibility determinations for students who have been identified as having a significant cognitive disability. To determine whether the student qualifies as an English Learner, the IEP team should be convened to discuss how to determine EL eligibility when one or more language domains are missing. The IEP team's review of all information and data serves as the initial screening process for students whose disability precludes the

assessment of one or more language domains. The IEP team should include an ESOL language specialist with experience identifying English learners.

- If the IEP team determines that the administration of the WIDA ELP Screener with accommodations is not appropriate to identify this student as an EL, the IEP meeting minutes suffice as documentation of this decision.
- The committee meeting minutes must be maintained in the student's cumulative record along with notes supporting the committee's decision.
- A flag or note could be placed with the Home Language Survey in the permanent record to alert any reviewer to see the IEP minutes dated XXXX for decision regarding screening.
- Student's EL status would be reported to the state in SIS as EL=Yes or EL=No. If this status were to change, an explanation must be included in the Data Collection submissions.

If the student cannot be assessed with any portion of the ELP Screener, it is the obligation of the IEP Team to revisit the EL eligibility decision at least annually.

## **Security Procedures**

The WIDA Screener is a secure assessment and it secured based on GaDOE State Assessment Security Guidelines. All ACSS personnel in contact with secure materials and personnel administering the WIDA Screeners, follows GaDOE State Assessment Security Guidelines to ensure the security and integrity of the WIDA Screener assessments.

- 1. All WIDA Screeners is administered by a GaPSC-certified educator who has successfully completed the WIDA training and passed the certification guizzes.
- 2. ACSS Personnel administering the screener assessments are directly responsible for the security of screener assessment materials and must account for all materials within their custody.
- 3. Screener materials are always kept secure.
- a. While in the Screener Test Examiner's custody, secure Screener materials must be kept in a locked storage area when not being used for actual administration to students
- b. During Screener administration, materials and students will always be supervised.
- c. At no time should the Screener Test Examiner or other personnel keep test materials in a classroom or other unauthorized storage area overnight.
- d. Screener Test Examiners must account for all Screener materials before dismissing students from the testing room.
- e. At the conclusion of each Screener administration, Screener Test Examiners are responsible for immediately returning all screener materials to the School Test Coordinator.

### **ELP Screening Irregularities**

Collaboration between the Federal Programs Director and District Testing Coordinator ensure that training is provided on the screener administration, ELP screener security, and accurate ELP screening processes. Irregularities are addressed by Federal Programs Director in collaboration with District Testing Coordinator. ACSS ELP Screener Irregularity Form is completed by the staff who provided the screener. It is signed and copies are provided to both Federal Programs Director and District Testing Coordinator. Original is kept in the student's permanent folder.

The following irregularities will require the completion of an ELP Screener Irregularities Form:

- Incorrect grade-level screener administered
- Incorrect language domain subtests administered
- · Screener administered by non-WIDA certified or untrained staff
- Screener administered without appropriate accommodations to a student with disabilities or with suspected disabilities
- Screener administered to an English-only student
- Screener administered to a transfer student with existing EL status, such as EL=YES, EL=1, EL=2, EL=3, EL=4, and EL=F.

# Core EL documentation includes the following:

- 1. HLS (original, signed, dated, in a language parents understand)
- 2. ELP Screener Score Report, dated (initial)
- 3. OCR Parent Notification for ESOL Language Program services (dated, one copy for each year student is in ESOL program) (Not a Federal Programs Title IA nor Title IIIA requirement)
- 4. EL/TPC (one for each year)
- 5. Parent Waiver (applicable number of copies signed, dated, in a language parent understands)
- 6. Annual ELP assessments results (annual results for each year student was tested)
- 7. EL Reclassification Form, when applicable
- 8. Two years of post-exit monitoring records

# ACSS PROCEDURES FOR EXITING EL STUDENTS

The GaDOE has provided flexibility to local school districts to develop a procedure to exit EL students from the ESOL Program. This flexibility has been based on GaDOE's completion of a statewide analysis of the 2019 ACCESS 2.0 scores in comparison to prior ACCESS scores and the Georgia Milestones ELA assessment. Composite Proficiency Level (CPL) scores across the state decreased as a result of revised ACCESS scoring. As a result, GaDOE has determined that an ACCESS 2.0 CPL score of 4.3 is associated with performance within the Developing Learner Achievement Level.

ACSS will administer the annual ELP assessment to all English Learners (Kindergarten ACCESS, Grades 1-12 ACCESS for ELLs, & Alternate ACCESS, as applicable) and will monitoring EL ACCESS Participation Rate on an annual basis. During the summer,

ACSS completes the Non-Participation Application provided by the GaDOE Assessment and Accountability division. Reason are provided for each non-participating student on the administration of the ACCESS or Alternate ACCESS. ACSS reviews annually the ELP Assessment Participation Rate to ensure all ELs information in Infinite Campus is up to date.

In FY19, all ESOL teachers in Appling County, within GaDOE's guidelines of flexibility for exiting ELs, decided that an ACCESS 2.0 CPL score of 4.5 or better reflected performance for exiting ELs from the ESOL program. ACSS reviews and agrees on the exit criteria annually.

Revised 7.25.2022

## **ACSS EL Exit Criteria**:

#### Kindergarten

 Exit EL students who score CPL > 5, and Listening, Speaking, Reading > 5, and Writing > 4.5 on the Kindergarten ACCESS.

#### Grades 1-12

- Exit all EL students who score Overall CPL > 5 on the ACCESS for ELLs
- ACSS EL Exit Criteria for EL scores with scores of 4.5-4.9 on the ACCESS 2.0, an EL Reclassification Team comprised of an ESOL teacher, the regular education teacher, and/or Resource Staff will review ACCESS score patterns, Georgia Milestone scores, Lexile Scores, RTI/SPED status, and classroom grades to determine whether or not to exit the EL student for the upcoming year.

The GaDOE Reclassification Form will be completed and finalized based on the committee's decision and will be recommended to the principal for approval. This document will be housed in the EL's permanent record and ESOL student file.

The status of EL students who exit ESOL will be changed on Infinite Campus from EL-Y and coded as EL-1 after July 1. Each year, after July 1, the students' post-EL Exit Code will be updated.

#### Receiving Exited EL Students from Transfer LEAs:

When a Reclassified EL student transfers to another GA LEA, ACSS will honor the EL Reclassification Decisions made by transferring LEA when the transfer occurs after the October FTE count. If the transferring LEA uses a lower EL Exit Criterion than ACSS, and if the transfer occurs during the first two weeks of school, ACSS will observe student performance for two weeks and convene another EL Reclassification Team to review documentation and evidence, when applicable. However, the EL Exit Date must be June 30 of the school year that just ended.

# **Exiting Procedures for English Learner Students with Disabilities:**

In ACSS the Alternate ACCESS for ELLs® assessment of English language proficiency (ELP) has been used for students in grades 1 -12, who are classified as English learners and have significant cognitive disabilities that prevent their meaningful participation in the regular ACCESS for ELLs® assessment. Eligibility to participate in the Alternate ACCESS, a student must be eligible to participate in the GAA 2.0 assessment. The Alternate ACCESS for ELLs® aligns with the WIDA Alternate English Language Proficiency levels designed to expand upon Level P1 - Entering, by increasing the sensitivity of the measure for students who have significant cognitive disabilities. The alternate ELP levels give students a chance to demonstrate progress within Level P1.

In ACSS, the student's Individual Education Program (IEP) Team may recommend exiting from EL status an English learner with significant cognitive disabilities who has been assessed yearly on WIDA's Alternate ACCESS for ELLs® English Language Proficiency (ELP) assessment when the student has reached the standardized statewide threshold as stated below. In order to make this recommendation, the IEP team will document evidence that the EL student's English proficiency is no longer a barrier to full participation in the student's individualized program of instruction with supports as established in the IEP.

# Alternate ACCESS Threshold for considering EL Exit:

Alternate ACCESS **Overall CPL P2 (Emerging)** for two consecutive years with IEP Team recommendation OR any other Alternate ACCESS Overall CPL – the **same score** - for three consecutive years with IEP recommendation.

## **EL Exit Procedures**:

- The IEP Team will serve as an English Learner (EL) Reclassification Team by completing the state provided EL Reclassification / IEP Team Rubric for English Learners with significant cognitive disabilities who have met the state's established Alternate ACCESS Threshold for considering EL Exit, as stated above.
- IEP teams who are considering reclassification of EL/SWD who have met the Alternate ACCESS criteria may want to finalize any possible EL status changes within 30 days of the beginning of the school year and before the October FTE count.

#### Post-exit Procedures:

- For two consecutive school years, the exited student's progress toward IEP goals
  must be monitored by designated ESOL and Special Education personnel to
  ensure the exited student's English proficiency is not a barrier to full participation
  in classroom instruction and assessment in English. Monitoring documentation
  must be maintained in the exited student's permanent/cumulative records.
- The IEP team with a 2nd language specialist could revisit the EL Reclassification decision during the two-year post-exit period of monitoring student's progress, if

the team determines the student would benefit from language assistance services as provided by the ESOL language program.

Exiting Procedures for English Learner Students with Less than Four Domains: Under the ESSA, as determined by the student's IEP team or 504 Plan, if a student's disability is directly related to a domain for which there are no appropriate accommodations, the student may be exempt from taking that language domain assessment.

**Note:** Students who are deaf, blind, and non-verbal would be considered as having a disability that precludes assessment in one or more language domains. Beyond these reasons, the Assessment Director should seek counsel from the GaDOE Assessment Division who would consult with Special Education and EL Learner Programs.

In April 2019, the state established that an English Learner (EL) with disabilities whose disability precludes assessment of one or more language domains should be considered for exit from English learner status when the student has met the following state-established criteria using a GaDOE-provided Designate Composite Proficiency Level (D-CPL).

### **D-CPL Process:**

- Administer the appropriate WIDA ACCESS for ELLs® or Alternate ACCESS language domain tests to the EL student as established in the IEP and/or IAP (504 Plan).
- 2. For each language domain test not administered, clearly mark Do Not Score with the reason code of SPD (Student's Program/Plan team's Decision code) in the student test booklet or in WIDA AMS. a. If the domain was not tested due to an IAP and not an IEP, please notify the GaDOE Assessment, Special Education, and ESOL offices. Thank you.
- NOTE: Although WIDA ACCESS Individual Student Report will only show results for the language domains administered and will not include composite proficiency levels, the report should still be shared with parents in a language they understand.
- 4. Using WIDA-provided language domain scale score tables, the GaDOE Assessment & Accountability Division will assign the lowest exit score for the missing language domain(s) to allow an overall composite proficiency level calculation.
- 5. The GaDOE Assessment & Accountability Division will calculate a Designate Composite Proficiency Level (D-CPL) for each EL student whose WIDA ACCESS score results are missing one or more language domains.
- 6. The GaDOE Assessment & Accountability Division will provide the school system with an ACCESS Designate Composite Proficiency Level (D-CPL) for each one of these EL students. Typically, this occurs in August.

7. After receiving the GaDOE-generated D-CPL, the appropriate standardized statewide EL exit criteria for the ACCESS for ELLs® or the Alternate ACCESS threshold for considering EL Exit would then be applied to determine whether the EL student will exit EL status or not.

## ACCESS for ELLs Exit Criteria;

An EL student with disabilities must be exited from EL status when the ACCESS for ELLs® 2.0 D-CPL is 5.0 or when the D-CPL meets the LEA-established exit criterion within the 4.3-4.9 range along with the EL Reclassification Form.

## Alternate ACCESS Threshold for Considering Exit:

An EL student with significant cognitive disabilities may be considered for exit from EL status when the Alternate ACCESS D-CPL is P2 (Emerging) for two consecutive years with IEP Team recommendation OR any other Alternate ACCESS D-CPL for three consecutive years with IEP Team recommendation.

## Data Collections Code - EL Exit Reason:

ACCESS for ELLs® scores are generally received and evaluated before the end of the school year. Therefore, LEAs may determine that an EL has successfully met the criteria for exit from the ESOL program at the end of the school year. To ensure that LEA data is recorded correctly for accountability and for funding purposes, coding in the LEA's SIS must not be changed for students before July 1. The ELs' coding should remain until all state data collection has been completed and signed off.

#### Reporting Date of EL EXIT

The EL Exit Date will be an end-of-the-school-year date no later than June 30. However, this date cannot be recorded in Infinite Campus until after July 1.

Each year, after July 1st, the student's post-EL Exit Status will change:

- The first-year post-exit starts July 1st after the student has met a qualifying exit score and/or Reclassification decision at the end of a school year or June 30. (Reclassification decisions are dependent on the release date of ACCESS scores)
- During the 2-year monitoring period Exited ELs are coded EL-1 and EL-2 for Year 1 and Year 2.
- Once the two-year monitoring period has ended, the student's coding for Data Collections Student Record purposes will change from EL-2 to EL-3 (3rd Year Post-Exit), and then EL4 (4th year Post-Exit).
- Following the EL-4 designation, the student will be coded EL-F (Former EL).

Post Exit Data Reporting		
EL-1	1st year post-exit – student progress is monitored by teachers & reported to state	
EL-2	2nd year post-exit – student progress is monitored by teachers & reported to state	
EL-3	3rd year post-exit – student progress is reported to state	
EL-4	4th year post-exit – student progress is reported to state	
EL-F	5 or more years post-exit – student progress in no longer monitored	

#### **EL EXIT REASON**

EL EXIT REASON describes the method used to determine the student's placement in the monitoring phase. The EL EXIT is required when student's EL status is '1' or '2'.

Code	Description
'1'	ACCESS for EL proficiency
<del>'2'</del>	Language Assessment Conference (LAC) (discontinued 2017)
'3'	Exited out of state or from a non-public
<b>'4'</b>	EL Reclassification Team Decision
Blank	N/A

#### Accommodations on State Assessments:

For state assessment purposes post-exit EL students who are in the two-year monitoring period are eligible for appropriate standard accommodations as outlined on the EL/TPC form. See the current GaDOE Student Assessment Handbook on the Assessment webpage. Please note, that after the two-year monitoring period ends, EL-3 and EL-4 students are no longer eligible for any EL-related testing accommodations.

#### Monitoring:

ESOL students are **monitored** for two calendar years after exiting the program. ESOL teachers maintain documentation of academic performance during this time. Documentation may include student grades, state and local test scores, attendance records, and/or teacher evaluations of student performance. This information is kept in student folders in the ESOL classroom. In addition, students will continue to be coded for additional two years post exit status.

# <u>Post-Exit Reverse-Reclassification Decision-Making Process for EL=1 and EL=2 Students:</u>

As monitoring student's progress continues, it provides a safety net to ensure that if the student should begin to struggle due to language proficiency, it is caught quickly, and appropriate support is reinstated.

In ACSS, it is the responsibility of the RtI team to determine whether the EL-exited student is struggling because of a lack of content knowledge or whether the EL-exited student is struggling because of a lack of English language proficiency. ESOL teachers are essential to the RtI review process as they understand the process and timeframe of second language acquisition, especially those ESOL teachers who have taught the exited EL in recent years. The team comprised of an ESOL teacher, the regular education teacher, RtI, and/or Resource Staff may administer a valid ELP assessment from among vendor choices, however, the WIDA ELP assessment will not be used because it is not an option for an exited EL students.

- First, the team will examine whether its locally chosen exit criteria is ensuring that EL students are proficient enough in English to be successful in the classroom. If the team finds that changes to locally designed exit criteria are necessary, The exit criteria will be revised as necessary.
- Secondly, ACSS will ensure that the struggling student is provided all instructional support available to all students within the school.
- The third step is to ensure that the RtI team is aware of the student's lack of academic progress and success. The RtI team should examine student data and determine appropriate interventions or appropriate increases in the intensity and duration of such interventions, following RtI protocols. Tier 2 or 3 progress monitoring processes should be implemented as for any other student.

#### Questions Rtl team will take into consideration:

- 1. Was the exited student educated formally in his/her home country? Was schooling consistent or did the student's education have prolonged periods of interrupted schooling or no schooling?
- 2. What were the exited EL student's ACCESS for ELLs scores and sub-scores in each domain?
- 3. Was the student exited from EL status based on a prior Language Assessment Conference? (Note: The state-directed LAC protocol was discontinued in Spring 2017.) o If a LAC determination had been made in the past, were the ACCESS for ELLs overall CPL scores at the high end of the 4.0-4.9 range or was the Literacy sub-score close to 4.8?
- 4. Was the student exited from English language assistance services based on English Learner Reclassification Review Committee decision? (Note: The LEAdirected Reclassification process was introduced Spring 2018.) o Was the student's ACCESS for ELLs® overall CPL score at the high end of the 4.3 - 4.9 range or at the low end?
- 5. Were the exited student's Georgia Milestones Language Arts/ELA End-of-Course scores borderline for meeting standards or where they significantly above the minimum requirement?
- 6. In the courses in which the exited student is struggling, what is her main area of difficulty?
  - a. Is she having difficulty specifically in the domain of writing, or reading, for example, or are there factors outside of language that are involved?

- b. Is he struggling in a course in which he has always had difficulty?
- c. Are the teachers differentiating instruction specifically to reach and support multi-lingual students?
- d. Is it a lack of concentrated effort on the exited student's part, or does she turn in all assignments, but perhaps the quality of the work does not meet the requirements for a passing grade?
- e. If so, would appropriate differentiation allow this student to adequately demonstrate his knowledge and comprehension of the content, or does he lack the background content information to be able to access the curriculum and fully comprehend the material?
- f. Is this student receiving academic support to compensate for any lack of background information?

The final analysis of the Team reviewing all this evidence and data is to determine whether the problem truly is a lack of language proficiency, rather than a lack of content knowledge, cognitive issues, or a disability.

If it is determined that the problem is a lack of English language proficiency, then the Rtl team will follow the following Reverse-Reclassification EL Entrance procedures:

- 1. Conduct an EL Reverse Reclassification team Meeting and document the team's decision on the EL Reclassification Form.
- If the team has determined that the student's status should remain as Exited Student (EL=1 or EL=2), no changes should be made in the Student Information System (SIS). All documentation should be maintained in the student's permanent/cumulative record.
- 3. If the team has determined that the student's status should reverse back to EL status, then parent's consent must be obtained, per OCR Guidelines.
- 4. **Timeline** for changing student's status in SIS from EL=1 or EL=2 to EL=Y:
  - a. If the Reverse-Reclassification decision is made in August or September before the Oct FTE count:
    - Then, change the status back to EL immediately and serve the student in the ESOL language program again.
  - b. If the Reverse-Reclassification decision is made between Oct FTE and March FTE:
    - Then, change the status back to EL immediately and serve the student in the ESOL language program again.
    - Explain the Data Collections Error received.
  - c. If the Reverse-Reclassification decision is made after the March FTE count:
    - Then, wait until after the June 30 Student Record sign-off to change the student's status back to EL=Y. • All documentation should be maintained in the student's permanent/cumulative record.

- After the student's status is reversed, and is identified again as an EL student, then the WIDA ACCESS for ELLs assessment can be administered during the state testing window.
- When the student meets the LEA's EL exit criteria for a 2nd time and is reclassified as English proficient for a 2nd time, then the two-year monitoring period must begin again for a 2nd time.

Post-Exit Re-Screening Decision-Making Process for EL=3 and EL=4 Students
Returning to US Schools After Multiple Years in Non-English School Environments
State guidance provides ACSS with flexibility to conduct RtI meetings during the first two years of post-exit monitoring for reverse-reclassification purposes. When students leave the country and are schooled in non-English environments, the state in essence freezes their EL status. When returning to US schools, students continue with the EL status they had when they left. However, state guidance does not provide ACSS with flexibility to use this same reverse-reclassification process during a student's third and fourth year post EL exit.

Therefore, an alternate procedure for students in this situation, will implemented by reviewing and complying with information provided in the OCR Dear Colleague Letter (2015, p. 34) and the English Learner Toolkit, Chapter 8, "If an exited EL is not progressing academically as expected and monitoring suggests a persistent language need, ACSS should re-test the student's English language proficiency with a valid, reliable, and grade-appropriate ELP test to see if the student must be offered additional language assistance services. In no case should re-testing of an exited student's ELP be prohibited. If the student is reentered into EL services, however, ACSS will document the reasons why and the parent's consent to reentry."

ACSS will consider the following factors before proceeding with a decision to re-screen an EL=3 or EL=4 student who has returned to US schools:

- The student demonstrated full English proficiency at an early elementary grade level, i.e., was exited from EL status.
- Following EL exit, the student was successful in U.S. schools during the first two years of post-exit monitoring and then left the country and was schooled in a non-English environment for three or more years.
- The student is currently enrolled in a grade level that has high academic English expectations; thus, a sense of urgency points to re-screening and possibly serving in the ESOL Language Program. Additional considerations would include ensuring students a pathway to graduation within a reasonable amount of time.

Given these factors, ACSS would have flexibility to administer the ELP Screener again. The results of the ELP screener will determine next steps. OCR requires parent's consent to reentry; therefore, parents will be notified and documentation will be kept in the student's permanent folder. (OCR Dear Colleague Letter, 2015, p. 34).

# Post re-screening steps:

- Per OCR, clear documentation must be maintained in the student's permanent records regarding the decision-making process and results. ACSS will provide a locally created form to accompany the new screener in the permanent records.
- If ELP screening results in a new EL=Yes status, ACSS will relieve any Data Collections errors during FTE and Student Record and will work with the GaDOE ESOL office and Data Collections to craft the justification to relieve the errors.
- If this occurs before or during the ACCESS testing window, the new EL=Yes student will be administered the ACCESS.
- All EL=Yes students will be provided with appropriate ESOL services, a Parent Notification Letter, an EL/TPC for state assessments, and accurate data reporting in the LEA's SIS.

## <u>Professional Development and Technical Assistance</u>

ACSS promotes ongoing, EL-focused staff development opportunities, as needed. Administrators, ESOL teachers, and general education teachers will be given opportunities to participate in EL-centered staff development sessions throughout the year and in all the schools. Specific trainings may include, but are not limited to, WIDA conferences, WIDA ELDS framework and standards, GATESOL, and GaDOE-sponsored RESA trainings. Within the system, ESOL staff will implement on-going staff development within grade level collaborations; topics addressed in this professional development may include information related to academic language development, WIDA Standards, Can-Do Descriptors, ACCESS testing and scoring interpretation, EL teaching strategies, and EL-specific data disaggregation.

Twice a year, professional development (PD) is offered by ESOL certified staff at every school in the district. PD training to all teachers, paraprofessionals and administrators is generally presented during collaborative or faculty meetings. Presentations are available on the Q-Drive as a resource for administrators, teachers, paraprofessionals, to review and use for training any new staff.

#### PD training is directly related to the following topics:

Identification, screening, and exiting students

Interpretation of scores

Evaluation of services

Strategies for increasing student academic performance

Differentiation of activities and lesson planning based on Can Do Descriptors and language proficiency

ESOL staff also attend annual seminars such as WIDA Conferences, GATESOL, GaDOE-sponsored trainings, and RESA to learn strategies that help increase student performance, academic vocabulary, and English language acquisition providing funds are available. These trainings generally last one-to-three days in duration. Any new learning gleaned from these sessions is often re-delivered to teachers and administrators at each school and is implemented in the classroom.

Teachers in the ACSS also have opportunities for professional development on instructional strategies for ELs such as Kagan, Thinking Maps, WIDA ELD Standards, Can-Do Descriptors, and programs selected for Reading and Math throughout the ACSS. Instructional coaches in collaboration with ESOL teachers also provide ELfocused professional learning to non-ESOL classroom teachers, school leaders, administrators, and other school or community based organizational personnel to improve the instruction and assessment of English learners, enhance the ability of such teachers, principals, and other school leaders to understand and implement curricula, assessment practices and measures, and instructional strategies for English learners. Goals include increasing student's English proficiency or Substantially increasing the subject matter knowledge, teaching knowledge, and teaching skills or such teachers. The EL professional learning plan in place, is consistent thought the year. Evidence of effectiveness are provided by walkthrough Observation checklist to ensure that practices are being implemented or if additional professional learning is required. Teachers are encouraged to include the best practices as part of the lesson plan. The Federal Programs Director is directly involved in the PL processes and collect evidence of implementation.

## Parent and Family Engagement and Community Involvement

Each school in the Appling County School System (ACSS) will provide parent and community outreach involvement activities that includes all parents to the extent possible face to face or virtual. These meetings will take place throughout the school year, during school, or after school hours. An Annual Title III/ESOL face to face and/or virtual meeting is held at the beginning of every school year to explain ACCESS scores, initial eligibility, program delivery models, continuing eligibility, and parent notifications. In this meeting and/or throughout the school year, parents of ELs have an opportunity to discuss their child's education. ACSS and individual schools will continue communicating with parents via social networks (Facebook, ACSS website, school websites, Class Dojo etc.) and media (newspaper, radio, online news, and zoom) over the course of the academic year.

For parent unable to attend face to face school meetings, virtual meetings are provided as an option. As a last measure for a meaningful communication with parents, parent notifications, scores, and parent and family engagement opportunities are mailed directly to the parents. In addition, Infinite Campus-Parent Portal houses the most important student information for easily access. Presentations on how to access Parent Portal have taken place to ensure parents know the steps to access the site and what type of information is available on their children.

There are many opportunities at each school for parent engagement and/or community involvement where ESL Teachers have an opportunity to connect with parents during the Parent Lunch Day, Book Fairs, Parent Advisory Council Meetings, Curriculum Nights, etc. Parent and Family Engagement activities vary from school to school. Parents are notified of events in the students' home language through Class Dojo, Shout Point, Social Media, and/or school websites. Parents are also encouraged to check homework folders daily to assist with academics and behavior as needed. Based on safety

recommendations/required/needed/mandated, Parent and Family Engagement meetings may be held virtually or via phone to facilitate safety. Sessions provided to parents of ELs include information on the ESOL program, ACCESS test scores, Georgia Milestones (GMAS), and Supplemental Services. Parent sessions will be held to provide parents with information on their child's academic success in school.

Parents of ELs are given opportunities to request types of services or workshops that are of interest and that will support student's academic growth. Workshops related to learning English and earning a GED have been popular responses. In response, ACSS implements workshops that meets the request of parents. The Federal Programs Director develops the plan and monitors the implementation of parent workshops and any other outreach activity that involves the parents of ELs.

#### **Comprehensive Needs Assessments**

School and District Personnel, Parents, Students and Community Stakeholders are given the opportunity to complete surveys, participate in the completion and approval process of the LEA Comprehensive Needs Assessment Meetings. Annual Title III/ESOL Needs Assessment meeting are held in the Fall of each school year to provide parents of ELs the opportunity to give input on Title III, ESOL, educational resources, budgets, and student's whole child needs. These meetings are provided in Spanish and English and all parents of ELs are invited. Invitations are sent home with the students. ESOL teachers are part of the stakeholder team that reviews and provides feedback on ELs. ELs data is reflected in the CLIP.

# **Budgeting**

The Federal Programs Director meets with administrators, ESOL staff, other program directors, to discuss School Improvement needs, CLIP (data, needs and root causes) and budgeting. The plan that drives the budget is based on the plans for extended, enhanced, or additional language learning opportunities, interventions, or other language-focused activities that will be provided to specific English learners to help ELs increase their English language proficiency and meet state academic standards. All budgeted items are aligned with the Title III, Part A English Learner Program Information Plan, that has been approved by GaDOE.

#### **Equipment Inventory/Procedures**

Equipment purchased with Title III, Part A funds will only be used for learning activities allowable under Title III, Part A. Physical inventories are the responsibility of the principal and will be conducted bi-annually at each school. Similarly, for any equipment located at the Central Office, physical inventories will be conducted and documentation will be signed by the Federal Programs Director. (Revised 7/25/2022)

## **Program Evaluation**

ACSS is held accountable for academic progress through the GaDOE accountability system, CCRPI. The ACSS program directors collaborate to monitor the effectiveness of program and subgroup data at each school and provides extra support and interventions

as needed for students to attain English proficiency and meet challenging State academic standards. The collaboration between ACSS program directors ensures that support and additional services of ELs who may also qualify for gifted, SPED, Migrant, or have an EIP in place are served and provided resources based on individual needs. The Federal Programs Director in collaboration with the District Testing Coordinator review ELP assessment participation rates, el Exit rates, content mastery, progress towards English Proficiency and CCRPI. The CCRPI measure is used for specific program evaluation, along with other assessments, benchmark data and/or teacher's input. The CCRPI platform provides individual school scores that identify strengths and weaknesses for different subgroups from year to year. ACCESS data may be used to determine strategic placement into the next grade, for placement and/or retention, and for remediation/enrichment purposes. Supplemental Title III, Part A programs are implemented based on student's academic achievement, ACCESS scores, and school participation, parent's survey results, and teacher needs.

Program activities funded by federal programs are evaluated for its effectiveness. Practices, checklist, and data that are used to evaluate effectiveness: Pre and post benchmark data for extended day or summer school Observation checklist and surveys for professional learning Oral feedback and survey data from parents on parent activities and workshops

# Plan of Action for not coding students correctly as immigrants:

New procedures are now in place at the district level to ensure that all data clerks code students correctly when students are enrolled in the U.S. schools less that three years. The district data director met with all the school's data clerks and reviewed this information. All records were corrected. Revised 12/2/2022

# **SECTION 29: TITLE IV, PART A**

Effective FY20, Title IV, Part A funds were transferred to Title I, Part A.

Authorized in December 2015, Every Student Succeeds Act (ESSA) introduced a new block formula grant under Title IV, Part A with a wide range of allowable uses. Title IV, Part A, Student Support and Academic Enrichment (SSAE) grants are intended to improve student's academic achievement by increasing the capacity of Sates, LEAs, schools, and local communities to:

- Provide all students with access to a well-rounded education
- Improve school co9nditions for student learning, and
- Improve the use of technology in order to improve the academic achievement and digital literacy of all students. (ESEA section 4101)

# SECTION 30: TITLE V, PART B – RURAL EDUCATION INITIATIVE

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

- Rural Flexibility the Alternative Use of Funds Authority
- Rural Flexibility provides eligible ACSS (LEAs) with greater flexibility in using the formula grant funds that they receive under certain State-administered Federal programs. This portion of the SRSA program is not a grant program and does not provide LEAs with funding.

The Title V, Part B director will meet with Program Directors, the Superintendent and CFO to discuss school improvement plan needs and budgeting. Based on program requirements and the system/school plans for identifying needs of the students, the Director prepares the Title VB budget according to the funding allocation. The principal meets with the School Leadership Team to examine needs which have been identified through data analysis and examination of the school improvement plan (Title I). The schools submit budgets, which are then reviewed for allowable costs, which are reasonable and necessary to carry out the Title VB program. Once necessary revisions have been made at the school level, the school budgets are compiled and placed in the consolidated application. Schools may not requisition items until they have been notified that the budget(s) has been approved at the state level. Once approval of the application has been made, schools are notified to spend Title VB funds as budgeted and to complete requisition request for purchases. Requisitions are then processed following the purchasing procedures described in Section I. Schools are encouraged to submit purchase orders within two weeks of being notified that the funds are available.

The Title VB director keeps an excel sheet logging all purchases based on the requisition forms signed by the Program Director. Monthly budget status sheets are provided to the Title VB Director and other Program Directors by the CFO. These are used to monitor expenditures and verify that the appropriate codes and purchases meet the approved Title budget.

The Title VB program provides technical assistance to all schools as described in Section I. Any purchases of equipment and/or real property are processed in according to the procedure in Section 17.

# SECTION 31: CHARTER SCHOOLS/SPECIAL CHARTER/COMMISSIONED SCHOOLS

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

# **SECTION 32: AUDITS**

The Appling County School System is audited annually by the Georgia Department of State Audits. They audit the financial statements of the governmental activities, each major fund, and the aggregate remaining fund information for the system. The audit includes consideration of internal controls over financial reporting that are appropriate for each fund. The Superintendent and CFO meet with the auditor-in-charge to discuss any finding or recommendations. Following the exit conference, the district receives a written copy of all findings and recommendation points. In the event a finding is related to a particular program rather than general financial matters, the CFO meets with the program director to discuss and establish a corrective action plan (CAP). The CFO submits required written responses to all findings which are included in the final audit report which is available to the public. (See Internal Controls, Section 15 and Appendix A)

# **SECTION 33: COMPLAINT PROCEDURES**

# **Complaint Procedures under the ESSA Act**

# A. Grounds for a Complaint

Any individual, organization or agency ("complainant") may file a complaint with the Appling County Board of Education if that individual, organization or agency believes and alleges that a violation of a Federal statute or regulation that applies to a program under the ESSA Act has occurred. The complaint must allege a violation that occurred not more than one (1) year prior to the date that the complaint is received, unless a longer period is reasonable because the violation is considered systemic or ongoing.

# **B.** Programs:

Title I Part A (CFDA 84.010) - State Program Code 1750, Title I Part A Academic Achievement Awards (CFDA 84.010) - State Program Code 1752, Title I, Part A Reward Districts Awards (CFDA 84.010) - State Program Code 1753, Title I School Improvement 1003(a) (CFDA 84.010) - State Program Code 1770, Title I, Part D Neglected & Delinquent (CFDA 84.010) - State Program Code 1755, Title I, Part C Migrant (CFDA 84.011) - State Program Code 1762, Title II, Part A Teacher Quality (CFDA 84.367) - State Program Code 1784, Title III, Part A Language Instruction for LEP and Immigrant Students (CFDA 84.365A) - State Program Codes 1811 & 1816, Title X, Part C McKinney-Vento Ed. for Homeless Children and Youth (CFDA 84.196) - State Program Code 1800, Title V, Part B Rural Education Achievement Program (REAP) (CFDA 84.358) - State Program Code 1847, Race To The Top (RT3) - (CFDA 84.395) - State Program Code 4230.

#### C. Filing a Complaint

A formal complaint must be filed in writing to the Appling County School superintendent or his/her designee.

The complaint must include the following:

A statement that the APPLING has violated a requirement of a Federal statute or regulation that applies to an applicable program

The date on which the violation occurred

The facts on which the statement is based and the specific requirement allegedly violated (include citation to the Federal statute or regulation)

A list of the names and telephone numbers of individuals who can provide additional information

Copies of all applicable documents supporting the complainant's position The address of the complainant

## D. Investigation of Complaint

Within ten (10) days of receipt of the complaint, the Superintendent or his/her designee will issue a Letter of Acknowledgement to the complainant that contains the following information:

- 1. The date the Department received the complaint;
- 2. How the complainant may provide additional information;
- 3. A statement of the ways in which the Department may investigate or address the complaint; and any other pertinent information.

If additional information or an investigation is necessary, the Superintendent will have sixty (60) days from receipt of the information or completion of the investigation to issue a Letter of Findings. If the Letter of Findings indicates that a violation has been found, corrective action will be required and timelines for completion will be included. Either the 30-day or the 60-day timelines outlined above may be extended, if exceptional circumstances exist. The Letter of Findings will be sent directly to the complainant.

# E. Right of Appeal

If the complaint cannot be resolved at the local level, the complainant has the right to request review of the decision by the Georgia Department of Education. The appeal must be accompanied by a copy of the Superintendent's decision and include a complete statement of the reasons supporting the appeal.

#### The complaint must be addressed to:

Georgia Department of Education Office of Legal Services 205 Jesse Hill Jr. Drive SE 2052 Twin Tower East Atlanta, GA 30334

# Appling County Schools: Complaint Form Please Print

lease i filit
Name of (Complainant):
Mailing Address:
Phone Number (home):
Phone Number (work):
Person/department complaint is being filed against:
Date on which violation occurred:
Statement that the Appling County School System has violated a requirement of a Federal statute or regulation that applies to an applicable program (include citation to the Federal statute or regulation) (attach additional sheets if necessary):

violated (attach additional sheets if necessary):
List the names and telephone numbers of individuals who can provide additional information.
Please attach/enclose copies of all applicable documents supporting your position.
Signature of Complainant: Date:
Mail or deliver this form to:
Appling County School Superintendent
Appling County Schools
249 Blackshear Highway
Baxley, GA 31513
Date Received:
Date of Response to Claimant:

# GENERAL GUIDELINES FOR THE DISPUTE RESOLUTION PROCESS

Georgia Department of Education (Updated August 3, 2003) McKinney-Vento Education for Homeless Children and Youth Act (42 US §11432(g)(1)(C)

# **Dispute Resolution Guidelines and Procedures**

- 1. All Disputes will be resolved at the APPLING level rather than the school level.
- 2. The dispute resolution process should be as informal and accessible as possible, allowing for impartial and complete review.
- 3. Parents, guardians and unaccompanied youth should be able to initiate the resolution process directly at the school in which enrollment is sought in accordance with PL 107-110,§722(g)(3)(A-B), as well as at the (LEA) homeless liaison's office. Parents, guardians and unaccompanied youth should be provided written notification of the dispute and of their right to appeal the decision of the LEA.
- 4. Parents, guardians and unaccompanied youth should be informed that they can provide written or oral documentation to support their position, and that they can seek the assistance of advocates or attorneys.
- 5. Written notice should be complete, as brief as possible, simply stated and provided in a language the parent, guardian, or unaccompanied youth can understand.

6. Students are to be enrolled immediately in the school of origin or in any public school that non- homeless students who live in the attendance area in which the child or youth is actually living are eligible to attend and are to be provided with all services for which they are eligible while the dispute is being resolved.

## **PROCEDURES**

- If a dispute arises over school selection or enrollment, the child or youth must be immediately enrolled in the school in which he or she is seeking enrollment, pending resolution of the dispute (PL 107-110, Section 722(g)(3)(E)). Enrollment is defined as "attending classes and participating fully in school activities." It is critical that students not be kept out of school.
- The school must refer the student, parent, or guardian to the LEA's homeless liaison to carry out the dispute resolution process as expeditiously as possible. The homeless liaison must ensure that the dispute resolution process is also followed for unaccompanied youth.
- The APPLING must provide the parent, guardian, or unaccompanied youth with a written explanation of the school's decision regarding school selection or enrollment, and the parent or guardian's right to appeal that decision 107-110, §722(g)(3)(E)(ii)]. The written explanation shall be complete, as brief as possible, simply stated, and provided in a language that the parent, guardian, or unaccompanied youth can understand.
- Each local school board must have a local rule for concerned parties to resolve any disputes in regards to providing public education to a homeless child. The local rule must provide for not less than two levels of appeal at the district level. If the dispute remains unresolved at the district level or is appealed, then the parent may request a review of the dispute by the Deputy Superintendent of Education Support and Improvement ("Deputy Superintendent") at the Georgia Department of Education (GaDOE). The Deputy Superintendent will review all materials and address the issues in the dispute within 10 days from the receipt of a written request for resolution. If the issue is not resolved after the Deputy Superintendent submits his or her written review, the Deputy Superintendent may assign members of GaDOE to make an on-site visit to further clarify or resolve the issue. All disputes must be resolved within 60 days of initial presentment to the GaDOE, unless a written extension is granted.
- If the dispute remains unresolved or is appealed after the Deputy Superintendent has issued his or her decision, the State Board of Education (SBOE) will review, hear, and rule on grievances from parents, students or local boards of education. The student, parent, guardian or local board must submit the request in writing within 30 days of the decision of the Deputy Superintendent to the Office of Legal Services at the GaDOE at the following address:

Georgia Department of Education Office of Legal Services 205 Jesse Hill Jr. Drive SE 2052 Twin Tower East Atlanta, GA 30334

Tel. (404) 656-4689 FAX (404) 657-8376

• The request for review must set forth the district level decision, the decision of the Deputy Superintendent, and a concise statement of the reasons why the decision is being appealed. The SBOE, through the Office of Legal Services, will give each party a minimum of 10 days' notice of the hearing by certified mail or personal delivery. Each part y may appear at the hearing in person or by counsel, present evidence, cross-examine witnesses, and present in writing or orally summary statements of position. The SBOE may request further information from the parties and GaDOE staff. The hearing may be held by the SBOE or by a hearing officer appointed by it. The SBOE will notify the parties of its decision within 20 days of the hearing.

#### GENERAL GUIDELINES FOR THE DISPUTE RESOLUTION PROCESS

# **Emergency Relief Funds (CARES Act, CRRSA, ARP Act)**

**John Wight** 

Director Federal Programs Phone: 404-463-1857 jwight@doe.k12.ga.us

# **Complaint Resolution Guidelines and Procedures**

- o All Disputes will be resolved at the APPLING level rather than the school level.
- The dispute resolution process should be as informal and accessible as possible, allowing for impartial and complete review.
- Written notice should be complete, as brief as possible, simply stated and provided in a language the parent, guardian, or complainant can understand.
- o If the dispute remains unresolved or is appealed after the District Superintendent has issued a decision, the State Board of Education (SBOE) will review, hear, and rule on grievances from parents, students or local boards of education. Please refer to the GaDOE Complaint Guidelines:

https://www.gadoe.org/School-Improvement/Federal-Programs/Pages/Formal-Complaints-under-ESSA-Programs.aspx

Georgia Department of Education Office of Legal Services 205 Jesse Hill Jr. Drive SE 2052 Twin Tower East Atlanta, GA 30334

# **SECTION 34: ETHICS, FRAUD, WASTE & ABUSE**

Principals are required to discuss policies at a faculty meeting at the beginning of the year. The Superintendent speaks annually to principals regarding ethics and fraud during at least one administrative meeting. Principals are to discuss the same information with their personnel. The Appling County fraud regulation describes the definition, staff responsibilities and internal controls/investigations. (See attached policy)

# **Procedures on Reporting of Fraud**

- To ensure that the reporting of suspicion of fraudulent activity occurs, the Appling County Board of Education School Board ensures employees, constituents, and providers shall have confidential channels to report suspicious activity.
- Fraud is a false representation of a matter of fact, whether by words or by conduct, or by concealment of that which should have been disclosed, that is used for the purpose of misappropriating property and/or monetary funds.
- The Board thoroughly and expeditiously supports the investigations of any and all reported cases of suspected fraud to determine if disciplinary, financial recovery, and/or criminal action should be taken.
- All reports of suspect fraud shall be handled in the strictest manner of confidentiality possible. Only those directly involved in the investigation should be given information. Informants may remain anonymous if and when possible but should be encouraged to cooperate with investigators and should provide as much detail and evidence of alleged fraudulent activity as possible.

#### **Procedures**

- 1. Anyone suspecting fraud concerning federal, state or local programs should report their concerns to the Superintendent or his/her designee. If the suspected fraud implicates the Superintendent, the informant shall report the information directly to the Board Chair.
- 2. Any employee of the school system who receives a report of suspected fraudulent activity shall report this information within the next business day to the Superintendent or his/her designee. Employees have the responsibility to report suspected fraud immediately. All reports can be made in confidence.
- 3. The Superintendent or his/her designee shall conduct or cause to be investigated of employees, providers, contractors, or vendors as necessary and appropriate. In a case where the Superintendent is suspected of involvement of fraud, the Board Chair or his/her designee shall conduct or cause to be conducted the investigation.
- 4. Periodic communication should emphasize the responsibilities and channels to report suspected fraud.

# SECTION 35: ASSESSMENT ADMINISTRATION, PROCEDURES, AND SECURITY

(Revised 9-16-2022)

# Appling County Schools: Assessment Security and Accountability

Appling County School District acknowledges the importance of maintaining a system of student assessment that is of the highest quality. High quality assessments must be administered in a manner characterized by integrity that is ensured only when sound procedures of test security and accountability are implemented. These procedures are designed to establish an environment in which student assessment is conducted in a way that establishes confidence that the results are reliable and valid and can be used to accurately gauge student achievement and improve instructional practices. Appling County Schools are committed to the use of online assessments, whenever possible, which greatly enhances test security, provides a more positive user experience, and maximizes the accessibility of these assessments to students with disabilities and other learning differences.

## **Plans and Procedures**

The following test security plans and procedures are designed to be consistent with guidance provided by the Assessment Division of the Georgia Department of Education (GaDOE) that is contained within the *Student Assessment Handbook* and to adhere to the *Code of Ethics for Educators* established by the Georgia Professional Standards Commission (PSC).

## **Local Assessment Calendar**

The System Test Coordinator must establish local testing windows inside the state testing windows provided by the Office of Assessment and Accountability and posted on the Georgia Assessment and Training Calendar. The System Test Coordinator will create a system testing calendar aligned with state testing windows. The system testing calendar will be shared with district leadership, all staff members, parents, and students. The system assessment calendar will be posted to all school websites and posted to the district website to avoid conflicts with other system or school activities.

# Local Scheduling

State-mandated assessments **must** be scheduled in accordance with published GaDOE testing dates. State assessments may be administered Monday through Friday only and during a system's/school's normal operating hours. Online testing may be administered only during the times of day that the applicable online testing platform(s) is provided under the terms of GaDOE's contractual agreement(s). Test administration schedules may not include weekend dates (Saturday and Sunday) for either online or paper-based assessments. In scheduling each mandated assessment,

schools must adhere to the testing times prescribed in the Test Administration Manuals. Allowing too much or too little time may result in an invalidation.

#### Communication

#### **Training Dates**

The System Test Coordinator creates a calendar of events for assessment training sessions. The System Test Coordinator also sends emails and calendar invitations to all School Test Coordinators for training sessions.

## **During Testing**

The System Test Coordinator utilizes the GaDOE Student Assessment Handbook, GaDOE training sessions, and assessment specific manuals to ensure School Test Coordinators know the guidelines for announcements, electric devices, and computer use during testing. In turn, School Test Coordinators train examiners to ensure adherence to the prescribe protocol and procedures found in the Student Assessment Handbook and assessment specific manuals.

#### **Testing Schedule**

The System Testing Calendar is posted to the district website and school websites. Prior to administration of any state mandated assessment, School Test Coordinators send correspondence to parents/guardians in the form of letters, shout point calls, parent portal, social media posts, etc.

#### Remediation and Retest Opportunities

Parents/Guardians of students that are eligible for retest are notified of retest opportunities by School Tests Coordinators via a phone call within 48 hours of electronic results.

#### **Communicating Student Results**

Appling County School System will utilize the State Longitudinal Data System (SLDS) Parent Portal for sharing of student Individual Student Reports (ISRs). If a parent/guardian cannot access the system through Parent Portal, the School Test Coordinator will print a copy for the parent/guardian.

## **Communication System Results (Revised 10/4/2022)**

Once the GaDOE embargo lifts, Appling County School System will share system results at its regularly scheduled Board of Education Meeting. In addition, the District/School Report Card in the form of CCRPI Reports and the Governor's Office of Student Achievement – Report Card is located on the district website under the departments drop down - Accountability, Assessment, Curriculum, and Instruction with the heading "Accountability Links" <a href="https://www.appling.k12.ga.us/administration/22">https://www.appling.k12.ga.us/administration/22</a>. To ensure information is up-to-date, the System Test Coordinator and/or the Federal Program's Director sends links to the district public relations administrative assistant who updates the website.

#### **Accommodations**

#### **Who Needs to Test**

The System Test Coordinator will collaborate with School Test Coordinators, ESOL Coordinators, and Special Education Coordinators to determine student enrollment and participation of each required assessment.

# **Accommodations**

Preparing for student accommodations will occur through collaboration meetings between School Test Coordinators, examiners, special education leaders, ESOL leaders, and the System Test Coordinator to ensure the most current IEP/504/TPC is used to determine accommodations. The System Test Coordinator will train School Test Coordinators to tag accommodations in the testing portal. School Test Coordinators will train examiners on the intent of specific accommodations and how to implement the prescribe accommodations during testing.

# **Technology**

# **Technology Readiness**

System Technology Specialist will update technology based on GaDOE's guidelines. The System Test Coordinator will send correspondence related to technology updates to system tech specialist as received to ensure adequate time to have software updated for each assessment. System Technology Specialist will update software and notify the System Test Coordinator when software update is installed and ready.

Online testing must take place using equipment owned by the local system/school. The security of the network used to administer the test must be confirmed by appropriate system-level technology personnel prior to testing. Online testing administrations must include the completion of all technology and student online readiness checks prior to administration and as prescribed by GaDOE's Office of Assessment and Accountability.

At least, one month prior to the opening of the assessment window for each assessment, School Test Coordinators will ensure that all devices used for testing have the correct software updates. In the event, a device fails to load, School Test Coordinators must reach out to system level technology personnel to rectify the problem.

# **Training of Personnel**

# System Test Coordinator (Revised 10/4/2022)

The System Test Coordinator will participate in all required GaDOE training sessions. The System Test Coordinator will train School Test Coordinators on the following: focused training procedures for before, during, and after testing to include distribution/collections of materials, monitoring during testing, ethical behavior, test security, test irregularities, accommodations, cell phone policy, review of examines, review of examiner/proctor roles and responsibilities. Documentation of these trainings

will be housed in the system testing room (attendance, agendas, minutes, attestation documents, etc.).

System Test Coordinators, School Test Coordinators, Program Directors, and test examiners participate in required GaDOE Assessment trainings that specify their attendance. Documentation of attendance is noted on the ACSD System Required Assessment Training verification form.

For state-mandated assessments that require entering of accommodations, such as ACCESS 2.0/Alternate ACCESS 2.0 and GAA 2.0, School Test Coordinators and examiners will train at the central office with the System Test Coordinator, ESOL Coordinator, and SPED Director to ensure correct entering and usage of accommodations.

The School Test Coordinator will review School Assessment Plans to ensure compliance with the District Assessment Plan.

# Assessment Security and Accountability (Revised 10/4/2022)

Educators must be GaPSC certified and adheres to the Georgia Code of Ethics for Educators to administer all state mandated assessments. As required by SBOE Rule 160-3-1-.07, certified educators (teachers, interpreters, counselors, administrators, and paraprofessionals) must administer all state-mandated assessments. The term Certified Educator in this statement is defined as those educators directly involved with the instruction of students, and who must hold a clearance certificate as defined by the GaPSC. Educators without Georgia certification from the GaPSC <u>must not</u> administer state assessments. Local systems must be mindful of certificate expiration dates and ensure that all examiners possess a valid/unexpired certificate at the time of test administration. The term Examiner refers to the person administering the assessment.

Each school year, the Appling County School District requires all PSC certified personnel with a role in the administration of state-mandated student assessments to participate in assessment compliance training. The content of the training is based on information included in the *Student Assessment Handbook* and GaDOE webinars. Content covered includes a review of the standards of professional ethics that specifically apply to student assessment, maintaining test security and integrity, guidelines for the selection and use of accessibility supports for instruction and assessment of all students, including students with disability and English Learners, the consequences of the failure to comply with the *Code of Ethics for Educators*, limiting the reporting of testing irregularities and the consequence associated with irregularities, and a review of the responsibilities for each role in the assessment program. This training includes explanation of the roles of School Superintendent, Principal, System Test Coordinator, School Test Coordinator, and Test Examiner/Test Proctor.

# Avoiding and Reporting Irregularities, and Assessment Security (Revised 10/17/2022)

The Appling County School District ensures strict test security. All School Test Coordinators, examiners, and proctors are trained on security and ethics and must adhere to the guidelines found in the GaDOE Student Assessment Handbook and in assessment specific manuals.

Any testing irregularity must be addressed immediately. The Examiner should contact the School Test Coordinator if there are any disruptions in testing sessions or if cheating or security violations are suspected. The School Test Coordinator, in turn, should notify the System Test Coordinator. The System Test Coordinator contacts a GaDOE Assessment Specialist as soon as possible and reports the testing irregularity in the MyGaDOE Portal.

Test Examiner notifies School Test Coordinator of Irregularity

School Test Coordinator notifies STC STC submits Irregularity to GaDOE

GaDOE reviews Irregularity

If the School Testing Coordinator becomes aware of a testing irregularity, he/she immediately contacts the principal and System Test Coordinator. The System Test Coordinator contacts a GaDOE Assessment Specialist immediately to determine if the test session can/should continue. If the decision is made to discontinue the testing process, GaDOE Office of Assessment and Accountability staff will assist system personnel with re-scheduling and/or re-testing, if appropriate. If the irregularity is revealed following the scheduled testing window, GaDOE Office of Assessment and Accountability staff should be contacted to determine if the scores on the affected tests are valid. All reports to the Office of Assessment and Accountability should be made by the System Test Coordinator.

Confirmed incidences of cheating will result in an invalidation of student scores. Irregularities must be coded, documentation completed, and submitted to the GaDOE Office of Assessment and Accountability. The System Test Coordinator is not required to call for guidance on irregularities concerning common place interruptions (e.g., alarms, sickness, cell phones/texts ringing, power outage, etc.). Once the irregularity code is received from the GaDOE Assessment Specialist, it may be used on future common place irregularities without calling the Office of Assessment and Accountability, but the irregularities must be reported in the MyGaDOE Portal. All incidents of secure content posted on public websites and/or social media sites must be reported immediately to the GaDOE Assessment Specialist and reported in the MyGaDOE Portal.

Security breaches and testing irregularities can have long-reaching impact on students, schools, and systems, as well as upon any personnel who might be responsible for causing or contributing to any circumstance leading to a testing irregularity. It is the responsibility of all personnel in the local system to follow

protocol as they become aware of testing irregularities.

The GaDOE Office of Assessment and Accountability of the GaDOE will review all reports of irregularities and may advise the local system whether a report of possible unethical conduct should be made to the GaPSC.

## **Consequences for Violation**

System Test Coordinators and School Test Coordinators clearly document attendance at all training sessions and include agendas and supporting presentations and/or handouts with specific guidance and policy related to test security and assessment administration protocols. Training includes a review of Student Assessment Handbook, assessment specific manuals, and defines and clarifies test security breaches and potential opportunities for irregularities and invalidations. Included in this training are the consequences of failure to adhere to assessment security and protocol including, but not limited to, the inability of the examiner to continue testing, adherence to a corrective action plan, referral to human resources, and/or a GaPSC referral.

# **Test Coordination and Administration (Revised 10/4/2022)**

Appling County School District implements a train-the-trainer model to disseminate information in regard to student assessment coordination and administration. The System Test Coordinator participates in training sessions conducted by the Assessment Division of GaDOE. The System Test Coordinator utilizes information from the GaDOE training sessions in conjunction with the Student Assessment Handbooks, assessment specific resource pages found on the GaDOE Assessment webpage, and assessment specific manuals to train School Test Coordinators. Documentation of these trainings are kept on file at the central office for five years.

School Test Coordinators, in turn, train school Principals, test examiners, test proctors, and others with a role in the assessment process utilizing material from the system training. The content of these training activities includes, but is not limited to, the secure storage and handling of test materials, information on providing testing accommodations, instructions to complete necessary coding of student records, specific procedures related to the administration of each assessment as outlined in test administration manuals, and information regarding the training of examiners and proctors. In addition, guidelines to minimize the occurrence of and the reporting of testing irregularities are reviewed and discussed to avoid future irregularities. Documentation of these trainings is kept on file at the school for five years. Additionally, upon completion of training, School Test Coordinators, examiners, and proctors/monitors are required to sign the three-page annual security signature form, which will be maintained in a file at the school.

System Test Coordinators, School Test Coordinators, Program Directors, and test examiners participate in required GaDOE Assessment trainings that specify their attendance. Documentation of attendance is noted on the ACSD System Required Assessment Training verification form.

### **ACCESS Participation Rates (Revised 10/4/2022)**

When participation rates are released, the School Test Coordinator checks to ensure the participation is at or above 95%. ELP Assessment Participation Rates for 2020 was 98.91, 2021 was 99.63 and 2022 was 96.15. When the participation rate falls below 95%, the System Test Coordinator will collect justification reasons for failure to meet the 95% expected rate of participation. A corrective action plan will be written to address the root cause.

#### **Timeline**

- October: Anticipated Released Participation Rate
- October: School Test Coordinator checks for 95% threshold.
- November: School Test Coordinator collects justification reasons for failure to meet the 95% participation rate.
- November/December: Corrective Action Plan written at the school level to address root cause resulting in failure to meet 95% participation rate.
- December: Implementation of Corrective Action Plan
- January May: Monitoring of Corrective Action Plan
- October: Anticipated Released Participation Rate Check to see if action steps implemented resulted in meeting of the 95% participation rate.

#### **Record Retention**

All Appling County Schools are required to adhere to the record retention policy. Each school will retain all assessment files for five years for the following items: training agenda/minutes/sign in sheet, training materials, examiner certifications, school test coordinator certification, and a copy of principal certification.

#### **Student Online Practice Opportunities**

All schools are required to provide students with online practice opportunities. Throughout the school term and at least two weeks prior to the opening of the assessment window, examiners must share the Experience Online Test Administration Demonstration with students and have students participate in the Experience Online Testing Georgia practice tests to ensure students are familiar with test item types, universal tools, and accommodations.

#### **Monitoring of Assessment Activities**

At the school level, the monitoring of assessment activities is primarily the responsibility of school building administrators. The Principal and School Test Coordinator must confirm that assessment procedures have been adhered to in their school by submitting the *Principal's Certification* form at the completion of test administration windows. School Test Coordinators monitor assessment through the DRC Portal to ensure all tests have been submitted at the conclusion of testing. In addition, the System Test Coordinator monitors assessment activities through the DRC Portal and at schools by performing random visits and observations during test administration. The Superintendent confirms that assessment procedures have been adhered to in the system by submitting to GaDOE the *Superintendent's Certification* 

form after January 31 and July 31 of each school year.

#### **Distribution and Return of Secure Testing Materials**

As the Appling County School District strives to maximize the use of online assessments, the transfer of paper copies of secure test materials is greatly reduced. However, there is a limited amount of transfer of secure material even for online assessments (i.e. test tickets and used scratch paper), and there are instances in which paper assessments are used which require more extensive security procedures. The system of distribution and return of secure testing materials is designed to maintain their security at each point of transfer, and any discrepancies are resolved at that time.

Vendor ↔ System Test Coordinator: All test materials are received from vendors by the System Test Coordinator in the manner prescribed by the State that is particular to the specific testing program. As soon as possible, the System Test Coordinator, in turn, distributes test materials intended for schools directly to School Test Coordinators. In the event that test materials cannot be distributed to schools on the day that they are received and/or there are overage materials that will be maintained by the system, the materials are securely stored as described in a subsequent section of this document (See Storage and Disposal of Testing Materials). If there are scorable and/or non-scorable materials that must be shipped back to vendors at the completion of testing, these materials are also stored as described prior to being readied for shipment back to the vendor.

System Test Coordinator ↔ School Test Coordinator: At the time of delivery of assessment materials to schools, confirmation of receipt is completed with the School Test Coordinator signing and dating to indicate receipt from the System Test Coordinator of each piece of test material that has a security number. At the conclusion of testing, test materials are returned to the System Test Coordinator who confirms receipt by signing off and dating to indicate the return of each piece of test material with a security number that had been originally transferred to the School Test Coordinator. Online test tickets and used scratch paper are also transferred to the System Test Coordinator during this process.

School Test Coordinator ← Examiner: To limit the amount of time that secure test materials are in the possession of test examiners, transfer of secure test materials to test examiners occurs no sooner before the beginning of testing sessions than is required by the demands of the particular assessment program. In turn, examiners are instructed to return testing materials to the School Test Coordinator immediately after testing is terminated and testing materials have been collected from students. Security Logs are maintained to document transfer of secure test materials between the School Test Coordinator and Examiner. The test security log lists the date of transfer, a description of the materials being transferred, the number of materials being transferred, and, if applicable, the security numbers of test materials being transferred. When materials are checked out by Examiners, they must, in the presence of the School Test Coordinator/designee, sign, and time stamp the form confirming the distribution. When the materials are returned, examiner in the

presence of the School Test Coordinator, must sign the form confirming the return of the materials.

#### Storage and Disposal of Testing Materials

<u>Storage</u>: At all times when secure testing materials are not in use for testing, they are stored in a secured locked area. This applies whether the materials are in the possession of the System Test Coordinator or School Test Coordinator. The secure storage areas are only accessible to the System Test Coordinator, or at the school level, the Principal and School Test Coordinator.

<u>Disposal of Testing Materials</u>: In regard to some testing programs, the State DOE directs school systems to securely dispose of some testing materials. In these cases, all materials are collected from schools by the System Test Coordinator as previously described. These materials are securely stored until such time that an independent document destruction vendor takes possession of the materials for secure destruction or they are shredded by the System Test Coordinator.

# **District/State Report Card:**

The Federal Program Director send annual emails to all the schools and district website master, on ESEA Section 1111(h)(2) requirements. The correspondence includes instructions to post the District/State Annual Report Card on the front visible page of each school's and district's webpage. Periodically screenshots are taken of the webpages and periodically, the links are checked. In the event that the link is taken off, emails are sent to the schools and/or district. Copies of emails are available for documentation purposes.

# **SECTION 36: IDEA**

The IDEA department of the Appling County School System (ACSS) follows the guidelines set forth in this manual in reference to all internal controls, inventory, and fiscal responsibility etc. IDEA specific procedures in relation to services, IEP development, eligibility determination, for students with disabilities can be found in the ACSS SPED Manual.

# **APPENDIX**

Appendix A: Title I Paraprofessional Non-Regulatory Guidance

Appendix B: FY23 ACSS Assessment Plan

**Appendix C: General Guidelines for Federal Equipment & Inventory**