

Tattnall County School System

Federal Programs Manual

FY23 Policies and Procedures

Purpose of This Handbook

The purpose of this handbook is to provide a systematic approach to implementing the regulations of federal programs to ensure compliance with federal guidelines at the system and school level as well as to provide consistency in practices for the district regardless of funding source. A description of each federal program-with general information regarding program requirements is included in this handbook. Following the guidelines presented in this handbook will ensure consistency and uniform practices throughout the school system. School level administrators are encouraged to use the information to ensure that federal programs are being implemented accurately and effectively for impacting student achievement.

The step-by-step approach contained in this handbook will promote uniformity in operations for the Tattnall County School District as staff seeks to carry out duties and responsibilities. The Georgia Department of Education (GaDOE) provides the Tattnall County School District extensive guidance on the overarching requirements for federal programs via the on-site monitoring document that is used to ensure that LEAs are meeting all statutory requirements of the programs. These specific requirements from the GaDOE document were used to create this handbook.

Tattnall County School System

Motto

"Whatever It Takes"

Mission

The Tattnall County School District is committed to doing whatever it takes to ensure a quality education that affirms ALL students' value and worth and will lead to high school graduation and productive citizenship.

Vision

The Tattnall County School District will utilize innovative strategies to ensure ALL students will be successful today and prepared for tomorrow.

- 1. Schools should maintain a safe, secure, and supportive learning environment;
- 2. Education is the shared responsibility of the school, home, and community;
- 3. Schools should provide a rigorous and relevant curriculum;
- 4. Each student should meet or exceed educational standards in order to reach his/her highest potential;
- 5. Instructional decisions should be driven by accurate and relevant data;
- 6. All students are unique learners and should be provided differentiated instruction;
- 7. The use of technology should be seamlessly incorporated into the standards based curriculum;
- 8. The system should employ and retain highly qualified personnel;
- 9. All individuals have worth and value;
- 10. Schools should promote sound character and national pride in all students;
- 11. Schools should continually and systematically evaluate and revise programs to meet the changing needs of learners;
- 12. Stakeholder involvement is essential to the success of students and the school system.

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Section 1: LEA Monitoring of Schools and Programs

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

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

LEA applications to the Georgia Department of Education (GaDOE) for Federal funding rely heavily on what has been defined by the LEAs through their flexibility agreements with the state. Flexibility options in Georgia include Strategic Waiver School Systems, Charter School Systems, and Status Quo School Systems. Each option sets a course for improvement for all students based on academic achievement targets to which the LEAs and schools are committed in exchange for greater flexibility under the law. LEAs also have the flexibility to fully consolidate Federal, State, and Local funds in specific Title I schools that operate schoolwide programs. Under the federal rules, there are multiple levels of consolidation, including no consolidation at all where the schoolwide Title I school operates a schoolwide program but does not consolidate any federal, state, or local monies with the schoolwide school's Title I, Part A allocation. Federal rules also allow a schoolwide Title I school to operate a schoolwide program and consolidate some or all of the school's federal funds, while not including any state or local monies. Currently, the Tattnall County School District is a Strategic Waiver School System utilizing the option to transfer federal funds to Title I and participates in the consolidated funding of federal, State, and local funds.

LEAs apply for their Federal funds through a consolidated application process to GaDOE. The application requires LEAs to identify the methods through which the intent and purpose(s) of each Federal program will be integrated into the LEAs' existing academic achievement targets and efforts towards continuous improvement. Responses as to how the Tattnall County School District will meet Federal program requirements, as defined in ESSA, are submitted in the

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

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

The Director of Consolidated Funds will conduct monitoring of all schools and programs (except Title II, Part A and IDEA) sufficient to ensure compliance with applicable program requirements and the intent and purpose of all federal programs. The Title IIA Director and SPED director are in charge of those programs.

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

The Director of Consolidated Funds and/or specific program directors will provide technical assistance to local schools as needed and will monitor all program expenditures to verify that all program expenditures comply with the intent and purpose of each program during the consolidation of funding initiative. The Director of Consolidated Funds will monitor all program expenditures of programs not included in consolidation to verify that all program expenditures comply with federal program requirements.

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

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

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

by the GaDOE. Implementation of the Corrective Action Plan will be monitored by the appropriate Federal Program Education Specialist.

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

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

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

- 1. Program Requirements : LEAs must submit for approval the Consolidated LEA Improvement Plan (CLIP) through the consolidated application process. Federal Program Specialists review each CLIP to ensure that the plan contains allowable activities for use and budgeting of federal monies. Once the CLIP has been approved, the LEA submits a budget reflecting the approved CLIP activities for review and approval by the Federal Programs staff assigned to the LEA. The LEA updates its CLIP under ESSA, as needed, to reflect changes, and submits the updated CLIP to the SEA for review and approval. Updates to the CLIP are typically performed on an annual basis.
- 2. Monitoring of Expenditures : LEAs must submit for approval an annual set of budgets, including for consolidation of funds, through the consolidated application process. Federal Program Specialists review each approved CLIP and program budget to ensure that expenditures are appropriate under program-specific federal guidelines and Uniform Grants guidelines before approving the budget. Once budgets are approved, Federal Program Directors monitor the funds drawn down for expenditures to ensure that LEAs

are likely to meet the drawdown of funds timelines. If the Federal Programs Director at the LEA level receives an email concerning the timeliness of the district's drawdowns and/or percent drawn down from the GADOE Federal Program Specialist, the emails are forwarded to the LEA Finance Director for corrective action.

- 3. Single audit: LEAs with single audit findings are flagged for technical assistance.
- 4. On-Site Monitoring: An SEA on-site Cross-Functional Monitoring Team visits a LEA to review the criteria included in the LEA monitoring rubric. LEAs are monitored, at a minimum, on a four-year cycle.
- 5. Self-Monitoring: LEAs not receiving an on-site visit complete a self-assessment.

Communication and Monitoring

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

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

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

Meetings are held throughout the year with administrators, curriculum specialists, Migrant Family Outreach Coordinator, and the parent engagement coordinator, to discuss specific program information and best practices. Phone calls, site visits, and emails are a daily occurrence between school staff and district program personnel.

Verification of Monitoring

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

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

Process for Identification of High Risk Schools

Tattnall County Schools will use state data reports to determine if any school is considered at risk. If a school is identified, the district will meet at the beginning of the school year or within a timely manner after the report is received to determine a plan of action for addressing the school's needs and what resources may be needed to support the school in the implementation of the school's improvement plan. Other considerations will include school leadership, demographics, CCRPI scores, employee absences, student absences, and attrition rates.

Onsite Monitoring Procedures

All schools are subject to on-going monitoring throughout the school year. The Director of Consolidated Funds is responsible for on-site monitoring of all schools throughout the year for compliance with federal guidelines and the consolidated funding initiative. Feedback is provided to the principals via emails, staff meetings, and phone conversations which take place throughout the year as a means of providing on-going monitoring and communication with each school. Specific program requirements not impacted by consolidation are monitored by program directors as assigned by the superintendent.

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

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

Federal Programs Monitoring of School & Plans

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

Timeline for Monitoring Federal Programs

July

- Complete Periodic Certifications for FY23.
- Provide technical assistance sessions for all schools following the GaDOE Federal Programs Conference on any new guidelines if applicable.
- Complete copy of "Parent's Right to Know" letter.
- Post approved "Parent's Right to Know" letter on school website.
- Give guidance on Title I Annual Meeting, School Parent Compacts, and Parent & Family Engagement Plans.
- Principal meetings for Parent & Family Engagement Annual schedule
- Update District Parent and Family Engagement Plan

August

- Work with administrators and school personnel on annual revision of SIP plans and budgets to ensure that funds are being spent according to plans
- Examine school and individual teacher schedules for certification/PQ/In-field by Title IIA and/or HR Director. Set up meetings with teachers who need certification Plan. Assist teachers who need GACE tests scheduled and study guides ordered.
- Principals Send 20 day notifications to parents if applicable for any teachers who do not meet PQ/certification requirements. Notice filed at school and sent to HR director.

- Notification of FY 23 allocations
- Meetings with admins, Curriculum Specialists, Parent Engagement Coordinators, Homeless Liaison, N & D Liaison and/or Directors, Title III Director, Superintendent, Finance Department, Human Resources, MFOC, and other departments pertinent to the Federal Programs as needed.
- Update Title I Inventory
- Migrant Parent Occupational Surveys go out to all students on first day of school
- SIP Plans Due/SWP checklists signed Complete Consolidation of Funds Budget Approval checklist for SWP, Intent and Purpose, Fund 150 Allocations
- Home Language Surveys go out to newly enrolled students

September

- Meet with Academic Coaches technical assistance
- Annual Title I Informational Meeting
- Review of all new hires and certification plans by Title IIA and/or HR Director
- Building principals and HR department meet to review teacher certification plans and in field and out of field reports. Check on GACE registration for non PQ teachers.
- HR department reviews all certificates (teachers and paras) to include field descriptions including clearance, gifted, ESOL, SPED, and teaching field
- HR Director notifies principal to send 20 day notifications to parents if applicable. Copy kept at school and sent to HR director.
- Review budget reports

October

- Verification of all required parental notices have been distributed.
- Final schedules due to Title IIA and/or HR Director for CPI. Check on progress for certification plans.
- HR Director notifies principal to send 20 day notifications to parents if applicable. Copy kept at school and sent to HR director. HR Director reviews certification plans.
- Distribute School-Parent Compacts
- Verification required that all Title I schools have held an informational Title I Annual Meeting by Oct. 31
- Budgets due in Consolidated Application Oct. 1
- Completion Reports due Oct. 31
- Submit documentation of building parent capacity
- Onsite Monitoring

November

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

December

- Federal Programs School visit (if not completed in Nov)
- Discuss Results of any Monitoring
- Carryover Funds to be budgeted for COF

January

- Begin preparations for next year SIP
- Revise SIP if needed to align with carryover funds
- HR Director notifies principal to send 20 day notifications to parents if applicable. Copy kept at school and sent to HR director. HR Director reviews certification plans.

February

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

March

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

April

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

May

- Principal survey of Title I needs
- Revision of Parental Involvement Policy, School-Parent Compact, Title I Schoolwide Plan
- Annual Title I Input Meetings (2 meetings)
- Updated Federal Programs Inventory

June

- Final district meeting to revise district parent involvement policy and plan.
- Final revisions of Title I Schoolwide Plan, School-Parent Compact, and Parental Involvement Policy
- Update Student and Personnel Handbooks for Title I updates
- Submit CLIP to GaDOE by June 30th

Ongoing Throughout School Year

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

Process for Working with Schools and Feedback

- June-September: The Director of Consolidated Funds will provide or schedule sessions for all schools following the GaDOE Federal Programs Conference to update principals and directors on any new guidelines if applicable.
- All district admin meeting sessions will include the following topics as standing agenda items open for discussion:
 - □ Consolidation of funds & budgets
 - Compliance (Ethics/Fraud Policy/Assessment/FERPA)
 - □ Parental involvement
 - □ Professional learning
 - □ Meeting the academic needs of students through schoolwide programs

- □ Central office support and monitoring
- □ Academic achievement (CCRPI)
- □ Meeting intent and purpose
- □ Infield/PQ/Equity
- □ TKES/LKES
- □ Inventory
- □ Scheduling for Instruction
- □ Needs of subgroups (SWD, ESOL, Migrant, Homeless)
- □ Complaint procedures
- □ Transportation Issues
- □ Other
- June-July: The Federal Programs Director will work with principals on annual revision of compacts and parent involvement plans and will identify budget needs. Director of Consolidated Funds will submit the CLIP by June 30.
- August: The Director of Consolidated Funds will work with all personnel to finalize the annual revision of SIPs and review SIPs and budgets to ensure that funds are being spent according to plans and that plans have all the necessary components.
- August-June: Meet with principals as needed. Provide additional training as needed.
- August-June: Inventory items purchased with federal funds. Monitor schools; provide feedback and corrective action if needed.
- August-June: All federal programs are monitored as needed by the appropriate program coordinator. Ongoing review of school improvement data and plans.
- August-June: The Academic Coach at each school will provide a minimum of two trainings per semester to staff regarding Building Staff Capacity to work with parents.
- January-February: Conduct meetings with principals to review staff earnings, ensure school improvement plans and budgets are being implemented with fidelity, and begin the CNA process.
- February: GCEL conference
- Ongoing: Budgets are reviewed and each purchase order is examined by appropriate personnel to ensure purchases are allocable, reasonable, and necessary and that items purchased are supporting strategies contained in the system and/or school improvement plans. This process occurs through Informa as purchase orders are routed through appropriate personnel. The Director of Consolidated Funds approves all Informa requisitions for school based COF funds. Requisitions are compared to the Intent and Purpose of each federal program as well as the School Improvement Plan before they are approved.
- February-March: Begin the annual comprehensive needs assessment with stakeholders. Data is provided to system and school leaders so each can compile data to determine prioritized needs for the following year. Student, staff, parent, and stakeholder surveys are prepared for dissemination.
- Ongoing: Federal program directors and the Director of Consolidated Funds provide technical assistance and communicate with principals as needed through phone calls, site visits, emails, and/or staff meetings.

Monitoring of Neglected & Delinquent Facilities

Neglected and Delinquent facilities are identified via the GaDOE's website. There are no N & D facilities in Tattnall County.

If one is added, the following would be in place:

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

Data Review

Data reviews for all schools are compiled and discussed during administrative meetings and at the Board of Education meetings when CCRPI results are released to the public. Schools meet and analyze data with the intent of improving instruction through grade level and content PLCs. This information is used to identify the root cause of the academic needs of students and special populations. This information is discussed in detail and is reflected in the updated schoolwide plans each year.

Reporting and Corrective Action Process (Audit and Monitoring Findings)

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

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

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

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

Results of Technical Assistance/ School Corrective Action identified by LEA

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

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

Equipment Inventory

All schools are required to maintain an active inventory of all items purchased with federal funds. All items purchased with federal funds are inventoried following the district inventory procedures. The inventory form contains the purchase date, vendor, the source of funding of property (including FAIN if federal funds are not consolidated) item description, PO number, decal number, serial number, purchase amount, location, condition and use of equipment. The Federal Programs Director or Special Education Director conducts inventory once a year for all schools that purchased equipment with federal funds. Each school is required to conduct a physical inventory at least once per year.

§ 200.313 Equipment (d)

⁽¹⁾ Property records must be maintained that include a description of the property, a serial number or other identification number, the source of funding for the property (including the FAIN), who holds title, the acquisition date, and cost of the property, percentage of Federal participation in the project costs for the Federal award under which the property was acquired, the location, use and condition of the property, and any ultimate disposition data including the date of disposal and sale price of the property.

⁽²⁾ A physical inventory of the property must be taken and the results reconciled with the property records at least once every two years.

Section 2: Comprehensive LEA Improvement Plan (CLIP)

The Tattnall County School System utilizes a variety of data sources to make decisions that will affect student learning and teacher effectiveness. Our needs assessment process includes examining student achievement data, process data, demographic data, professional learning needs, equity data, class size data, TKES data, and verbal input from stakeholders. In March, each school conducts a Comprehensive Needs Assessment Stakeholder meeting that may include parents, teachers, paraprofessionals, administrators, community members, students, and other support staff. Once the input is collected from the stakeholder input and data and to make decisions regarding prioritized needs and equity concerns. The culminating activity from the various meetings involves completion of the GaDOE provided template for the system's comprehensive needs assessment. Stakeholders participating in our needs assessment process include members of the district leadership team, administrators and teachers from each level, paraprofessionals, curriculum specialists and counselors, parents, community members, and students.

The results of this needs assessment determine any prioritized areas of need/inequity and guide the development of the various documents and parts that make up the Comprehensive LEA Improvement Plan (CLIP), Equity Plan (as part of the CLIP), and each schoolwide plan and provide focus for the expenditure of funds.

Timeline for the LEA Comprehensive Improvement Plan

January

- Principal's meeting to begin CNA process
- 1st Semester CLIP Progress Monitoring in SLDS

February

• Review process with district leadership team.

April

- Hold stakeholder planning meeting
- Use district PowerPoint to guide the planning process
- Discuss and respond to questions in the PowerPoint
- Solicit input from stakeholders for addressing identified needs
- School complete the process onsite
- Send out parent, staff, student, and stakeholder surveys

May

- Work on updating CLIP, Equity, and School Improvement Plans with leadership teams
- 2nd Semester CLIP Progress Monitoring in SLDS

June

• Completed school-level plans uploaded for System Leadership to review

• Submit CLIP to state by June 30th

July

- Upload CLIP components, including Equity Plan to GADOE portal
- Post CLIP/DIP on district website

August/September

- Review and approve school-level plans and district-level program plans
- Upload complete school CNA and Improvement plan components to the GaDOE portal

Guidance to Schools/Departments

All components of the CLIP are required prior to the district receiving funding from state and federal programs. CLIP revisions take place annually using prior year data and needs assessment information. The CLIP serves as the plan detailing coordination of various federal programs, plans for consolidation (Intent and Purpose) and the identification of needs and in-turn budgeting for such needs with available funds. The CLIP includes the following components: 1) district CNA report; 2) district improvement plan; 3) parent and family engagement plan; 4) foster care transportation plan; and 5) Title I, Part C identification and recruitment plan. Department directors, coordinators, specialists, school and system leaders, as well as community and parent stakeholders are involved in the revision process.

Parents are sent information inviting them to participate via email, telephone, newspaper, social media, flyers, website, and/or newsletters. The Tattnall Migrant Lead Recruiter takes invitation letters in person to invite Migrant and ESOL parents and students. The district conducts an annual survey each year that allows parents to provide input on district policies and procedures, particularly those related to Parent and Family Engagement. Parent input is examined and considered from these surveys and parent stakeholder meetings. Documentation includes sign-in sheets, agendas, emails, survey responses and returned plans with comments. Several opportunities are available to garner input from all stakeholders. For example, input is solicited from district, school, and curriculum leaders at administrative and curriculum PLCs. The Director of Consolidated Funds and program directors gather all input and update the various components of the CLIP. The plan is submitted to the Superintendent for final approval.

Review and Approval Process

Tattnall County's District Leadership Team is responsible for conducting an annual review of the CLIP components, at which time revisions are made. The Tattnall County School System is committed to cultivating and sustaining partnerships with parents and community stakeholders, and encourages their participation in the development, implementation, review and evaluation of its Comprehensive LEA Improvement Plan (CLIP) and all of the components therein. All parents of Tattnall County School System's students are provided multiple opportunities to be involved in the development and revision of the system's CLIP. These opportunities include access to the components of the CLIP during various meetings, at a district wide parent meeting held in the

Fall, and at spring school based Title planning meetings. Once the CLIP has been completed in the GaDOE portal, all district directors, including the following programs: Title I, Part A (Disadvantaged Children), Title I, Part C (Migrant Education Program), Title I, Part D (Neglected and Delinquent), Title II, Part A (Teacher and Leader Quality), Title III and English to Speakers of Other Languages (ESOL), Special Education (IDEA) and Title X, Part C (McKinney-Vento Education for Homeless), and CTAE (Carl Perkins) are provided the opportunity to review and make any final changes before the CLIP is submitted for approval to the GaDOE by the Director of Consolidated Funds.

Resolution for Unapproved Plans

If the GaDOE requests revisions to the CLIP, Equity, or School Improvement Plans, the Director of Consolidated Funds retrieves the requested changes from the Audit Trail in the GaDOE portal. The Director of Consolidated Funds then communicates with the appropriate school or district based personnel to ensure that requested changes are completed in the consolidated application. The Director of Consolidated Funds provides technical assistance as appropriate, makes corrections and/or approves corrections to CLIP, Equity, and/or School Improvement Plans, and then resubmits the plans. This process is continued until each plan has been approved by GaDOE.

CLIP Schedule/Timeline

July/August

- The newly approved CLIP is made available on the district website.
- The newly approved CLIP is made available to parents in print for parents if requested. If requested in print, a feedback form will be provided.

August-October

• The current CLIP is made available during parent meetings (Annual Title I).

February-April

• The current CLIP is made available during any school Title I Planning Meetings and opportunities for input are provided on paper.

January

• Report 1st Semester CLIP Progress Monitoring Data in SLDS

May

• System-wide School Improvement Forum is held for final input into the CLIP.

May-June

- Changes are made to the CLIP based on feedback obtained by multiple means/stakeholders and the CLIP is finalized for upload.
- Report 2nd Semester CLIP Progress Monitoring Data in SLDS
- CLIP submitted in SLDS by June 30th

School Improvement Plans

School Improvement Plans are created each spring for the following school year. Each school leadership team meets during the spring. The team is composed of representatives from each grade level, content area, and department, as well as administration. The stakeholders meet to develop a plan. During the meetings, data is analyzed and used to identify and develop solutions to challenges related to instructional strategies, professional learning, parent involvement, and budgets. School administrators then present the plan to the district as they work with other schools and system leaders to develop a system improvement plan. Once the plan is approved by system leaders, it is presented to and approved by the superintendent. It is through this process that the LEA oversees the development of school improvement plans. System leaders also support schools in developing, revising, implementing, and coordinating school level initiatives.

Evidence-Based Action Steps

Georgia's efforts to improve student outcomes rely on evidence-based interventions. Schools are reminded that all interventions must be evidence-based as defined by ESSA. ESSA defines an evidence-based activity, strategy, or intervention as being supported by strong evidence, moderate evidence, promising evidence, or evidence that demonstrates a rationale *ESSA 8101 (21)(A)*. Schools are encouraged to utilize the *What Works Clearinghouse website*, *Evidence for ESSA website, and the Best Evidence Encyclopedia website*.

Schoolwide Programs

All Tattnall County Schools operate Title I Schoolwide programs. The driving reason for this decision is to allow all children, especially the academic at-risk students, and all parents, an opportunity to have equal access to all related Title I assistance. Every school year, schools evaluate their Title I schoolwide program to identify programs and services that were successful during the CNA process. During this time, schools meet with their parents, community stakeholders, and staff to develop a comprehensive needs assessment aligned to the most recent data (formal and informal).

Process to become a Schoolwide Program

A schoolwide program is a comprehensive reform strategy designed to upgrade the entire educational program in a Title I school. The purpose of schoolwide Title I programs is to improve the entire educational program in a school which should result in improving the academic achievement of all students, particularly the lowest achieving students. The goal of such a program is to assist those students with demonstrating proficiency on academic standards. A school is eligible to be a schoolwide program:

- If the local educational agency (LEA) determines that the school serves an eligible attendance area.
- If for the first year of the schoolwide program, the school serves a school attendance area in which not less than 40 percent of the students enrolled in the school are from low income families.

• If the school consults with stakeholders and makes the decision to become schoolwide.

Schoolwide Title I programs must:

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

Adopting this strategy should result in an ongoing, comprehensive plan for school improvement that is owned by the entire school community and tailored to its unique needs. Schoolwide programs are not required to identify specific students as eligible. They must supplement (enhance) rather than supplant (take the place of) the services participating students would receive if they were not participating in the schoolwide program.

Components of a Schoolwide Program

Each schoolwide program must create a plan to address the eighteen components, ten of which are required, of a schoolwide program listed below:

- 1. Use such program's resources to help participating children meet the state's challenging student academic achievement standards expected for all children.
- 2. Use effective methods and instructional strategies that are based on scientifically based research directly tied to the comprehensive needs assessment and academic standards that strengthens the core academic program of that school and that:
 - 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.
- 3. Provide instruction by highly qualified teachers.
- 4. Professional development for the staff to enable all children in the school to meet performance standards.
- 5. Strategies to increase parental involvement.
- 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 assessments to provide information on, and to improve, the performance of individual students and the overall instructional program.
- 8. Coordination and integration of federal, state, and local services and programs.
- 9. Activities to ensure that students who experience difficulty mastering standards shall be provided with effective, timely assistance, which shall include:
 - a. List 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 the School-to-Work Opportunities Act of 1994, the Carl D. Perkins Vocational and Applied Technology Act, and National and Community Service Act of 1990.
- 10. 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 a student's difficulties are identified on a timely basis.
 - b. Periodic training for teachers in the identification of difficulties and appropriate assistance for identified difficulties.
 - c. 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.
- 11. Description of how individual student assessment results and interpretation will be provided to parents.
- 12. Provisions for the collection and disaggregation of data on the achievement and assessment results of students.
- 13. Provisions to ensure that disaggregated assessment results for each category are valid and reliable.
- 14. Provisions for public reporting of disaggregated data.
- 15. Plan developed during a one year period, unless the LEA, after considering the recommendation of its technical assistance providers, determines that less time is needed to develop and implement the schoolwide program.
- 16. 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, pupil service personnel, parents and students (if secondary).
- 17. Plan available to the LEA, parents, and public.
- 18. 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. Plan is subject to the school improvement provisions of Section 1116.

Process to become a Schoolwide Program

School Responsibility

- Present schoolwide information to parents and staff
- Assemble a committee of stakeholders to include, but not limited to: principals, teachers, parents, business partners, etc.
- Maintain sign-in sheets, agendas meeting minutes for each committee meeting
- Assemble committee to write and approve plan
- Post written plan in a language that parents can understand

District Responsibility

- Submit Letter of Intent for each school
- Assist with writing the Schoolwide Plan

- Package the Schoolwide Plan describing the use of resources and other sources to implement the 10 required components
- Fulfill program requirements
- Uphold requirements related to health, safety, civil rights, student and parental participation and involvement, services to private school children, maintenance of effort, and comparability of services

Continuation Requirements:

- Maintain documentation related to three core components (comprehensive needs assessment, comprehensive school plan, and annual evaluation of program effectiveness)
- Use Title I funds to supplement educational services and not supplant those funds that would, in the absences of Title I funds, be made available from non-federal sources for the school. Funds that would normally flow to the school from non-federal sources must continue to be provided to the school.
- Conduct an annual evaluation of the implementation of, and results achieved by, the Schoolwide Plan. This evaluation must determine whether the SWP was effective in increasing the achievement of students in meeting the GSE, particularly those students who had been furthest from achieving the standards.
- Review and revise the plan as necessary based on the results of the evaluation to ensure the continuous improvement in student achievement.
- Make the plan available to the LEA, parents, and the general public.

All schools are required to have school improvement plans. It is the responsibility of the principal to make sure that all plans are reviewed and revised annually. Plans must include all the components in the Schoolwide program checklist. School plans are reviewed and revised annually with parents and other stakeholders (teachers, principals, administrators, and other school personnel). Each school will hold an annual meeting, which provides all stakeholders the opportunity to review the school plan and make comments. All parents, teachers, administrators and other school personnel will be invited to the meeting to provide input. All schools shall notify stakeholders in multiple ways such as: notice of the meeting dates on the school marquee if applicable, school newsletters, website, REMIND, Class Dojo, flyers, social media, and school phone messaging system. Parents who cannot attend the meeting will be given the opportunity to obtain a copy from the school and submit input before the final revisions are approved upon request. Each school will use the schoolwide program checklist to ensure that required components are included in each plan.

Scheduling Models for Schoolwide Plans

A Title I school may use one or a combination of several instructional delivery models.

In-class Model: An "in-class" model is a Title I project in which the instructional services are provided to participating students in the same classroom setting and at the same time they would receive instructional services if they were not participating in the Title I project. Title I staff work closely with the classroom teacher to provide services which are supplemental and

particularly designed to meet participants' educational needs (small group instruction, guided reading).

Pull-out Model: In a Title I pullout delivery model, students are pulled from their regular classroom to receive remediation in reading and/or math. Students should not be out of their regular classroom's reading or math instructional time for more than 25% of that time.

Elective Model: Some middle schools use an elective course to supplement student's basic reading and math instruction.

Add-On (Extended Learning Time): An "add-on" delivery model means Title I services are at the times when participants would not otherwise be receiving state and locally funded instructional services. This may include periods such as vacations, weekends, before or after regular school hours, or during non-instructional time during the regular school day.

Targeted Assistance

The Tattnall County School District currently has no Targeted Assistance Schools at this time. In the future if the district has a school which would require Targeted Assistance, guidelines and procedures provided by the Georgia Department of Education will be followed for implementation.

Section 3: Services to Eligible Private School Children

Section 1120 of ESEA requires that local educational agencies (LEA) provide to eligible private school students, their teachers, and their families, services that are equitable to the services being provided to similar students, their teachers, and their families, attending public schools. Services for private school students must be developed in meaningful consultation with private school officials. Services provided to private school students by an LEA must be secular, neutral, and non-ideological.

Monitoring of Private Schools

There are no private schools located in Tattnall County.

At this time none of the Private Schools have elected to participate in our federal programs. Private schools are monitored by the Director of Consolidated Funds. Invitations for private schools to consult for participation in federal programs the following year are sent in the Fall, usually October, via ES4PS (mandatory platform for LEAs),fax, direct mail, or email. A meeting is held by GaDOE to present information about the programs available to students in private schools. School representatives are present at state meetings as requested. If a private school requests to participate, additional meetings will be scheduled with the district. If the Private Schools elect to participate in federal programs, the Private Schools are monitored by the Director of Consolidated Funds.

Title I, Part A: Improving Academic Achievement of Disadvantaged Students

Section 1120 of ESEA requires that local educational agencies (LEA) provide to eligible private school students, their teachers, and their families, services that are equitable to the services being provided to similar students, their teachers, and their families, attending public schools. Services for private school students must be developed in meaningful consultation with private school officials. Services provided to private school students by an LEA must be secular, neutral, and non-ideological.

Eligible private school children are those who:

- Reside within the attendance area of a participating public school, regardless of where the private school they attend is located.
- Are identified through consultation with the private schools as failing, or most at-risk of failing, to meet high student academic achievement standards.

Title I, Part C: Education of Migratory Children

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

Eligible private school children are those who reside within the attendance area of a participating public school, regardless of where the private school they attend is located.

Title II, Part A: Supporting Effective Instruction

Private schools may access Title II, Part A funds for professional development that meets the needs of their teachers. Planning for this professional development occurs through a consultation process between private school and school district personnel before the school district submits its Title II, Part A application. The LEA is required to contact appropriate officials of all private schools within the geographic boundaries of the LEA annually to determine if they want their teachers to participate in the Improving Teacher Quality State Grants program, regardless of whether or not those officials have recently indicated an interest in program participation.

Title III, Part A: Language Instruction for Limited English Proficient

Title III, Part A grants provide funding to help ensure that LEP students, including immigrant students, attain English proficiency, develop high levels of academic attainments in English, and meet the same state academic content and student academic achievement standards that all students are expected to meet. LEAs receiving Title III funds must annually provide private schools located in the geographic area served by the LEA with a timely and meaningful opportunity to participate in educational services intended for LEP children and educational personnel.

Title IV, Part A: Student Support and Academic Enrichment

Private schools may elect to participate in Title IV, Part A grants. This grant provides funding for activities to ensure well-rounded educational opportunities, safe and healthy students, and effective use of technology.

Eligible private school children are those who reside within the attendance area of a participating public school, regardless of where the private school they attend is located

To ensure meaningful consultation occurs, invitations for private schools to consult in the participation of federal programs the following calendar year are sent in the fall, usually October, using the ES4PS Platform on SDLS. The invitation includes a specific date and time for the initial consultation. The initial consultation presents information about the programs available to students in private schools. The COF Director issues the invitation in ES4PS, monitors the responses to the invitation, and holds the meeting if requested. The private school meeting has an agenda and sign in sheet to document consultation. Upon receipt of the intent to participate form, which is provided to private school officials, a meeting is held to discuss plans and the required components of IDEA, Title I, Part A (Disadvantaged Children), Title I, Part C (Migrant Education Program), Title I, Part D (Neglected and Delinquent), Title II, Part A (Supporting Effective Instruction), Title III (Migrant) and English to Speakers of Other Languages (ESOL), and Title X, Part C (McKinney-Vento Education for Homeless) services for private schools. Follow-up consultation meetings are then scheduled with officials from participating private

schools. After each consultation, public and private school officials sign a form indicating whether or not meaningful consultation occurred. Educational services and other benefits provided under this section for private school children, teachers, and other educational personnel shall be equitable in comparison to services and other benefits for public school children, teachers, and other educational personnel participating in the program and shall be provided in a timely manner.

Tattnall County will use the embedded worksheets in the GaDOE portal program information sections of each federal program to correctly calculate the amount of funds for equitable services to private school participants and their teachers and families, including carryover as appropriate.

Identification of Participants

The LEA will work closely with the private schools in the geographic region to verify attendance of possible students. As the DE1111 reports come in, the COF Director verifies school addresses. If the addresses are not located in the district, private schools are notified.

It is the responsibility of the private school to provide potential students names, addresses, and verification of free and reduced participation for qualification of the student.

Finance

It is the responsibility of the private school to submit requisition to the LEA for materials and services for the LEA to process. No requests for reimbursement will be allowed as all purchases must have prior approval. All materials and supplies purchased by the LEA are the property of the LEA. All inventories will be maintained by the LEA. The private school will complete an inventory check twice per year at the request of the Tattnall County School System.

Complaints

Complaints by the private school are filed in compliance with the Tattnall County School System complaint procedures.

Evaluations

At the end of April, the LEA will ask each private school to fill out a survey to evaluate services provided by the LEA.

Equipment

The private school will follow the same procedure as the Tattnall County School System.

Timeline for the Private Schools if they chose to participate

September

• Notifications sent to private schools within the LEA of eligibility to participate in planning professional learning activities in the next fiscal year.

October

- Send letter to request participation to private schools who work with Tattnall County Schools for the following school year.
- Notifications mailed to private schools serving students of the availability of Title I, A and Title III services.
- Send letter to private schools with students who are residents of Tattnall County inviting them to participate in the Federal Programs Meeting.
- Send letters to private schools located within the geographic boundaries of the LEA.
- Hold Private School Meeting consultation.

November/December

- Consult with private schools wishing to participate in Federal Programs for following year
- Gather data and consult with private schools to determine services and possible participants.
- Meet with private school officials to review timeline and consultation process.
- Establish a consultation calendar and procedures for collecting data.

January/February

- Review poverty data collected
- Review amount of funds available for services
- Determine criteria to be used to select eligible student
- Review of options for services provided
- Set up dates for future meetings

March/April

- Obtain from private school officials lists of names, addresses, and grades of private school students who meet criteria for Title I services.
- Rank students by greatest need for service
- Select Title I services for students
- Discuss how the Title I program will be evaluated

May/June

- Finalize the design of the Title I program for upcoming year
- Ensure LEA personnel who are providing services are in place and services start date is firm
- Finalize professional development programs and activities
- Finalize parental involvement programs and activities
- Provide consultation affirmation form
- Provide equitable services affirmation forms for signatures

August/September

- Review criteria to be used for evaluation of the effectiveness of the Title I program
- Conduct academic pre-assessments
- Host Title I parental information meeting for participants
- Complete a Parent Compact

October - March

- Meet with private schools periodically
- Meet with Title I teacher periodically
- Monitor implementation of the parent involvement component
- Monitor implementation of the professional development
- Ensure conference are occurring between Title I teacher and private school teacher and between Title I teacher and parents of participating students
- Physical inventories of equipment

April/May

- Complete parent survey
- Gather documentation to evaluate the effectiveness of the Title I program based on the criteria established at the beginning of the school year.
- Evaluate effective of the program

Consultation Process

Sec. 117 of the *Elementary and Secondary Education Act*, as amended by ESSA mandate that timely and meaningful consultation occur between the local educational agency (LEA) and private school officials prior to any decision that affects the opportunities of eligibility private school children, teachers, and other educational personnel to participate in programs under this act. Consultation shall continue through the implementation and assessment of activities under this section.

The following topics must be addressed during the ongoing consultation process:

- How the LEA will identify the needs of eligibility private school children;
- What services will be offered;
- How, where, and by whom the services will be provided;
- How the services will be academically assessed and how the results of that assessment will be used to improve the services;
- The size and scope of the equitable services to be provided, the proportion of funds that is allocated for these services, and how that proportion of funds is determined;
- The method and sources of data that will be used to determine the number of children from low-income families in participating school attendance area who attends private schools;
- How and when the LEA will make decisions about the service delivery mechanism that the LEA will use to provide equitable services. This decision must allow for through consideration and analysis of private schools officials' view on the provision of services through a third-party provider;

- How, if the LEA disagrees with the private school officials about the provision of services through a contractor, the LEA will provide the private school officials a written analysis of its reason for the decision;
- Whether the LEA will provide services directly, or through a separate government agency, consortium, entity, or third-party contractor;
- Whether to provide services to eligible private school students under a pool arrangement or to individual schools, based on the number of eligible students
- When, including the approximate time and day, services will be provided.
- Whether to consolidate and use Title I funds for equitable services with other ESEA programs.

Section 4: Fiduciary Responsibility

Financial Management System

The LEA maintains a proper financial management system in order to receive both direct and state-administered grants and to expend funds associated with a grant award. Certain fiscal controls and procedures must be in place to ensure that all financial management system requirements are met. Failure to meet a requirement may result in return of funds or termination of the award.

Identification 2CFR §200.302(b)(1)

The LEA must identify, in its accounts, of all Federal awards received and expended and the Federal Programs under which they were received. Federal program and Federal award identification must include, as applicable, the CFDA title and number, Federal award identification number and year, name of the Federal agency, and name of the pass-through entity, if any.

Financial Reporting 2CFR §200.302(b)(2)

Accurate, current, and complete disclosure of the financial results of each federal award or program must be made in accordance with the financial reporting requirements set forth in §§200.327 Financial reporting and 200.328 Monitoring and reporting program performances.

Accounting Records 2 CFR §200.302 (b)(3)

The LEA will maintain records which adequately identify the source and application of funds provided for federally-funded activities. These records will contain information pertaining to Federal awards, authorizations, obligations, unobligated balances, assets, expenditures, income and interest and be supported by source documentation.

General

The Tattnall County School District has established procedures to maintain internal control over all assets. The purpose of establishing internal controls is to provide a reasonable assurance that the District will accomplish its objectives of safeguarding assets, providing reliable financial information, promoting operational efficiency and ensuring compliance with laws, regulations, and established district policies and procedures.

Control Framework

The Tattnall County School District has implemented an internal control system and framework based on its internal and external needs. It is the policy of the district to ensure that its control framework provides for strong administrative governance. The district's internal control system is a relevant evaluation tool for internal control over financial reporting.

Ethics Statement

The Tattnall County School District makes every effort to set an honest and ethical tone for the district that is demonstrated at every level. The district operations reflect the overall attitude, awareness and actions of the school board, management, and others concerning the importance of how the district views internal control and the management of these controls.

Communication and Training

The Tattnall County School District makes every effort to maintain communication with all employees regarding the policies and procedures of the district including, but not limited to, periodic training for personnel at the school and central office and meetings of the school board. The Tattnall County School District's policies and meeting agendas are maintained on the District website with information necessary to the requirements for safekeeping of various assets and transparency of financial operations for both employees and taxpayers. Supervisory hierarchies are maintained to ensure proper approvals and processes are in place.

Personnel

The recruitment of competent, honest individuals is administered through the services of the principals, central office staff, and the Superintendent. The training of staff regarding the established policies and procedures governing all financial transactions is administered through the Finance Office if needed.

Control Activities

Bank Reconciliations: All bank accounts are reconciled on a monthly basis. The Finance Director approves the bank reconciliations and approves any adjustments necessary to the general ledger. The Superintendent also reviews the bank reconciliations as another level of control. The Assistant Finance Director cancels all checks as the checks clear the bank (as indicated on each bank statement) in the financial management system bank reconciliation software and locates any discrepancies in the balances, and makes any journal entries necessary for correction. The monthly registers, transaction journals, and general ledgers are generated monthly and are stored in the Finance Office and may be accessed for review by the Superintendent and other applicable parties.

Budget: The Tattnall County School District prepares and adopts an annual budget in accordance with Georgia Statutory requirements. The operating budget is prepared under the supervision of the Superintendent. The Superintendent, Finance Director, Assistant Finance Director, Principals, and Central Office personnel monitor all staffing and compare all positions to student class sizes. These decisions are reviewed by the Finance Director, Assistant Finance Director, central office personnel, and the Superintendent before being finalized by the local board of education.

The approval process for federal budgets is as follows:

- Funding amounts are approved by the GaDOE
- Award letters are sent to districts
- Schools are given the allocated dollar amount for budgeting and each federal program designee works with the school and Finance Department to develop the school level budgets through consolidation if applicable and the budget is adopted by the district BOE as part of the normal budget process.
- The budget is entered or uploaded into the GaDOE Consolidated Application by the program coordinator or authorized staff if applicable
- The budget is approved by the Superintendent (budget may be rejected at this level and requests for revisions may be made)
- The budget is approved by the program specialist at the GaDOE (budget may be rejected at this level and requests for revisions may be made)
- The budget amount is approved by the GaDOE accounting department
- The budget is entered into the LEA financial accounting system by system accountant or authorized staff using the Consolidated Budget as the source.

When determining how the district will spend grant funds, the originator of the purchase order, the program/grant manager in coordination with the finance department will review the proposed cost to determine whether it is an allowable use of federal grant funds before obligating and spending those funds on the proposed goods or services as well as determining if the purchase supports the intent and purpose as part of the district's consolidation process. All expenditures paid directly with federal funds must meet the standards outlined in EDGAR, 2 CFR Part 3474 and 2 CFR Part 200.

Budget Maintenance: The budget ledgers are maintained in the Finance Office using the financial management system used in conjunction with the cash balance and encumbrances to ensure that all spending is in accordance with budget authority, while budget object lines may be temporarily overspent, budget functions may not be overspent.

Final Cash Balances: Upon completion of the final close of each fiscal year, the district determines the actual cash balances for all funds and reports them to the GaDOE by the designated deadline.

Purchasing: The Director of Consolidated Funds is responsible for assuring that all purchases against the assigned budgets are appropriate and necessary and meet intent and purpose. The principals at each site primarily initiate the purchasing process. The request for purchase orders (requisitions) is the initial electronic document submitted to the Finance Department and once approved by all applicable program managers/directors the document is assigned a purchase order number form the Financial Management System and the amount is encumbered into the encumbrance ledger.

Subpart C - Pre-Federal Award Requirements and Contents of Federal Awards

Suspension & Debarment (Uniform Guidance 200.213)

Each specific federal program director and/or department head will check The System for Award Management (SAM) website, <u>https://www.sam.gov/portal/SAM_prior</u> to approving any purchase in excess of \$25,000 to ensure the vendor is not on the list of suspension and debarment. Our district cannot and does not purchase from any vendor or contracted person/company identified on the state's list.

Each summer the Federal Programs Director gets a list of the previous year's vendors who were paid \$25,000 or more from the Assistant Finance Director and checks the vendor list against the suspension and debarment list on Sam's. Signed and dated screenshots (by the Federal Programs Director) are filed to document this. The Federal Programs Director also keeps a list of all vendors and signs and dates it the day the check was performed.

Conflict of Interest

Grantees and sub grantees must maintain a written code of conduct governing the performance of employees that award and administer contracts (2 CFR 200.318(c)(1)). Employees of the Tattnall County School System who are engaged in the selection, award, and administration of contracts shall abide by the following: Tattnall Policy BHA

- No employee, office, or agent may participate in the selection, award, or administration of a contract supported by Federal award if he or she has a real 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 interested in or a tangible personal benefit from a firm considered for a contract.
- Officers, employees and agents of the Tattnall County School System may neither solicit

nor accept gratuities, favors, or anything of monetary value from contractors, potential contractors, or subcontractors. Definitions and examples of nominal items (LEA defines nominal items; Georgia's current ethics defines it as \$25.)

Violations of these standards will result in reporting of said personnel to the Superintendent of Schools and if appropriate, local authorities. Any misconduct could result in suspension, loss of employment and other consequences that are applicable by law.

The employee shall disclose in writing to his or her immediate supervisor any personal financial interest, business interest, or any other obligation or relationship that in any way creates a real or potential conflict of interest with the proper discharge of assigned duties and responsibilities or that creates a potential conflict of interest with the best interest of the LEA.

Subpart D-Post Federal Awards Requirements

Consolidation of Funds (Fund 150)

Tattnall County Schools participate in GaDOEs Consolidation of Funds as well as transferability. The purpose of consolidating funds is to help a schoolwide program school effectively design and implement a comprehensive plan to upgrade the entire educational program in the school based on the school's needs identified through its comprehensive needs assessment. Funds from contributing programs lose their identity. The school uses funds from this consolidated schoolwide pool to support any activity of the schoolwide plan. The funds that are consolidated are:

- State and local funds,
- Title I Part, A
- Title I, Part A Family Engagement
- Title I, Part A School Improvement
- Title II, Part A (Transferred to Title I)
- Title III, Part A,
- Title IV, Part A (Transferred to Title I)
- Title V, Part B
- Title IC K-12 portion
- IDEA 611 and 619

The Tattnall County School District only uses Fund 150 to meet the intent and purpose of the funding sources that are pooled. The Tattnall County School District complies with the guidelines established in *Consolidation of Funds Manual for Title I School Consolidation Programs*.

Allowability Procedures (Uniform Guidance 200.302)

Any purchases made with federal funds must follow the guidelines for allowable costs. The Tattnall County School System will follow guidelines as detailed in EDGAR, OMB Circulars (such as A-87), and applicable memos, letters, handbooks, and/or communication regarding

allowable/unallowable purchases provided by the Georgia Department of Education. The appropriate program director will direct any questionable expense to the GaDOE Area Program Specialist for that program for further clarification. All purchases funded directly by a federal program must be reviewed by the appropriate program director through the Informa Software utilized for processing purchases in the Tattnall County School District.

Authorization of Expenditures and Prior Approval of Purchases

The Tattnall County School District transfers Title II, Part A and Title IV, Part A to Title I. Title I, IIIA, Title VB, and Title IC K-12 are consolidated with state and local funds with the exception of required set asides. The Director of Consolidated Funds will ensure that all consolidated fund, Title I, Title IIA, Title IIIA, Title IVA, Title VB, Title IC K-12, Homeless, and N&D are reviewed and approved prior to purchase. The Director of Consolidated Funds will meet with all principals at the beginning of the year to review guidelines for purchases. The following procedures must be followed to ensure the proper handling of funds:

- 1. Each budget, after being prepared at the system or school level, is reviewed by the appropriate program coordinator, revised as necessary, and approved by the program coordinator. Once the system or school makes the necessary changes and the budget is submitted and approved by the GaDOE, each department or school completes requisitions in the school system financial software.
- 2. Requisitions must include:
 - Complete vendor information including phone number (and fax number if applicable)
 - Ship to information including the address for the school
 - Appropriate account number assigned by the system coordinator, principal, or designee based on the budget sheets
 - Sufficient detail to determine if each cost item is allocable, reasonable, and necessary

The requisition is then sent to the appropriate federal program approvers using financial software.

- 3. 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 and/or meets the intent and purpose. The Director of COF approves all requisitions from schools for COF purchases.
- 4. If approved, the program coordinator then signs off on the requisition, which forwards the requisition to the Business Services for approval and conversion to a purchase order using the financial software program.
- 5. If rejected, a reason is entered in the comment field that is then visible at the system and school level.
- 6. Accounts payable processes the final PO using the financial software faxes or emails PO to the vendor.
- 7. When the merchandise arrives, the school or department notifies Accounts Payable by signing the packing slip to indicate that all items were received. Accounts Payable marks

the order received and payment is processed. If a packing slip does not exist, the purchase is verified by email or phone call prior to payment. (ex. Web based software purchase)

Purchases and Invoices

The following procedures will be used for Purchasing:

- All purchase requisitions are generated though Informa by the school personnel.
- The purchase requisition is sent to the building level administrator who approves the purchase and forwards to the Federal Program designee.
- The Federal Program designee approves the purchase and forwards to the Director of Consolidated Funds.
- The Director of Consolidated Funds approves and forwards to the Assistant Finance Director to verify account numbers, etc. who then places the order.
- Once the order is received, the packing slip is signed by the receiving party and is sent to Accounts Payable to match the packing slip to the purchase order. If no packing slip is available, Accounts Payable contacts the school secretary to secure confirmation of receipts of items.
- Accounts payable is responsible for resolving any discrepancies and discussing any unresolved problems. Open purchase orders at year end are reviewed by Accounts Payable, the appropriate program coordinator and /or designees, school bookkeepers, and the Chief Financial Officer/Director of Consolidated Funds to determine if goods or services have in fact been received but not invoiced by the vendor. Contact is made with the vendor to secure an invoice if such instances are noted.

Accounts Payable: All vendor invoices are submitted to the Accounts Payable in the Finance Department. The vendor invoice is matched to the accounting copy of the purchase order. Once the documents are matched, the items invoiced are checked back to the items listed on the approved copies of the purchase order. Accounts Payable checks each invoice carefully to verify amounts due, shipping and handling costs, applicable discounts, and taxes. Accounts Payable can only pay the invoice if there are packing slips showing receipt or verification has been provided.

The Financial Management System generates an open payables report with the vendor information, invoice information and amount due. The open payables report is reviewed by the Finance Director and compared to the invoice and packing slip (if available) for each invoice to verify obligation and accuracy and to insure all documents are in order before checks are printed. The checks are then printed and encoded by a signature with the name of the Superintendent of Schools and the Chairman of the Board of Education. A listing of all checks written is created from the Financial Management System and is reviewed by the Finance Director and the Superintendent.

Records Reconciliation: The Finance Department administers the comparison of actual assets on hand with the amounts recorded in the Financial Management System. Monthly reconciliation of bank statements, fixed asset records, and other financial records are prepared and verified during the monthly closing process. All discrepancies found during the

reconciliation process are researched and corrected at the time they are detected. These closeout procedures are administered as a joint effort by the finance office staff. Reconciliation of bank accounts is handled by the Assistant Finance Director. The fixed asset listing is maintained and reconciled to the general ledger by the Finance Director.

Sick Leave: Employees, principals or principals' designee must submit absences through Frontline Absence Management and notify the building principal or supervisor. Other types of leave which require prior approval must be submitted through the Professional Learning request process in Informa and signed by the building principal or supervisor. Employees, principals, or principal's designee may also submit professional leave absences through Frontline Absence Management.

Transaction Authorization: The budget is allocated to each school site and program area and the authorization or expending of funds is assigned to the principal and/or program manager for monitoring. The individual school principal or appropriate program director is responsible for his/her budget and for assuring that each request is appropriate and necessary to meet the intent and purpose.

Transaction Recording: Transactions are recorded at the time of authorization resulting in the encumbrance of the budget. The Finance office staff is responsible for verifying the amounts, the classification to the appropriate account codes, and the proper authorization of all transactions prior to posting in the Financial Management System. All source documents used to record transactions are official District forms and are sequentially numbered by the accounting system for accountability. All voided checks are marked VOID and kept on file for the auditor's review. All voided Purchase Orders are marked VOID and are reflected in the Financial Management System.

Supplement Not Supplant

Uniform Administrative Requirements, Cost Principles, and Audit Requirement for Federal Awards (2 C.F.R. Part 200) presumes supplanting has occurred if federal funds are used to provide services that (not applicable to Title I, Part A):

- Were required to be made available under other federal, state, or local laws;
- Were provided with non-federal funds in prior years;
- Were provided to federal program eligible children, if those same services are provided with non-federal funds to non-federal program eligible children.

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

As a consolidation pilot site, to demonstrate compliance, the Tattnall County School District follows the guidance provided in the Consolidation of Funds manual for Title I Schoolwide consolidation programs. The district also demonstrates that the methodology used to allocate

state and local funds to each school receiving assistance under this part ensures that the school receives all the state and local funds it would otherwise receive if it were not receiving Title I funds through the Resource Allocation Methodology Plan (RAMP).

Selected Items of Cost- 2 CFR Part 200, Subpart E

2 CFR Part 100, Subpart E, examines the allowability of 55 specific cost items (commonly referred to as Selected Items of Cost) as 2 CFR §200.420-.475. These cost items are listed in the chart below with the citation where it is discussed.

Employees should not assume that an item is allowable because it is specifically listed, as it may be unallowable despite its inclusion in the selected items of cost section, or it may be allowable only under certain conditions, including prior written approval.

The expenditure may be unallowable for a number of reasons, including:

- the express language of the regulation states the item is unallowable;
- the terms and conditions of the grant deem the item unallowable; or
- state/local restrictions dictate that the item is unallowable or allowable only under certain conditions or circumstances.

The item may also be unallowable because it does not meet one of the factors affecting allowability of costs, such as being reasonable because it is considered too expensive. If an item is unallowable for any of these reasons, the district does not use federal funds to purchase it.

The selected items of cost address in 2 CFR Part 200, Subpart E include the following:

Item of Cost	Citation of Allowability Rule
Advertising and public relations costs	2CFR§200.421
Advisory Councils	2CFR§200.422
Alcoholic Beverages	2CFR§200.423
Alumni/ae activities	2CFR§200.424
Audit services	2CFR§200.425
Bad debt	2CFR§200.426
Bonding costs	2CFR§200.427
Collection of improper payments	2CFR§200.428
Commencement and convocation costs	2CFR§200.429
Compensation-personal services	2CFR§200.430
Compensation-fringe benefits	2CFR§200.431
Conferences	2CFR§200.432
Contingency provisions	2CFR§200.433
Contributions and donations	2CFR§200.434
Defense and prosecution of criminal and civil proceedings,	2
Claims, appeals, and patent infringements	2CFR§200.435
Depreciation	2CFR§200.436
Employee health and welfare costs	2CFR§200.437
Entertainment costs	2CFR§200.438

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Equipment and other capital expenditures	2CFR§200.439
Exchange rates	2CFR§200.440
Fines, penalties, damages and other settlements	2CFR§200.441
Fundraising and investment management costs	2CFR§200.442
Gains and losses on disposition of depreciable assets	2CFR§200.443
General costs of government	2CFR§200.444
Goods and services for personal use	2CFR§200.445
Idle facilities and idle capacity	2CFR§200.446
Insurance and indemnification	2CFR§200.447
Intellectual property	2CFR§200.448
Interest	2CFR§200.449
Lobbying	2CFR§200.450
Losses on other awards or contracts	2CFR§200.451
Maintenance and repair costs	2CFR§200.452
Materials and supplies costs, including costs of computing devices	2CFR§200.453
Memberships, subscriptions, and professional activity costs	2CFR§200.454
Organization costs	2CFR§200.455
Participant support costs	2CFR§200.456
Plant and security costs	2CFR§200.457
Pre-award costs	2CFR§200.458
Professional services costs	2CFR§200.459
Proposal costs	2CFR§200.460
Publication and printing costs	2CFR§200.461
Rearrangement and reconversion costs	2CFR§200.462
Recruiting costs	2CFR§200.463
Relocation costs of employees	2CFR§200.464
Rental costs of real property and equipment	2CFR§200.465
Scholarships and student aid costs	2CFR§200.466
Selling and marketing costs	2CFR§200.467
Specialized service facilities	2CFR§200.468
Student activity costs	2CFR§200.469
Taxes (including Value Added Tax)	2CFR§200.470
Termination costs	2CFR§200.471
Training and education costs	2CFR§200.472
Transportation costs	2CFR§200.472
Travel costs	2CFR§200.474
Trustees	2CFR§200.475
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Likewise, it is possible for the State and/or the District to put additional requirements on a specific item of cost. Under such circumstances, the stricter requirements must be met for a cost to be allowable. Accordingly, employees consult federal, State and District requirements when spending federal funds. For example, the travel rules for grants administered by the Tattnall County School District may be more restrictive than the federal cost principles allow, which means the district's policies must be followed.

Most programs also contain the supplement, not supplant requirements. In general, this means that in order for federal funds to make a difference in supporting school reform in a schoolwide program, they must supplement those funds the schools would otherwise receive. To ensure that this occurs, a schoolwide program school relies on the equitable distribution of non-Federal funds. Under ESEA section 11149a) (2) (B):

• A schoolwide program school 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 children with disabilities and English learners.

This requirement ensures that the Federal funds a schoolwide program school receives do not replace non-Federal funds the school would otherwise receive if it were not operating a schoolwide program. In other words, the supplement not supplant requirement for a schoolwide program is simply that the school receives all non-Federal funds it would receive if it did not receive federal funds.

Federal grant and related grant programs are planned as supplemental activities and should not be allowed to supplant current funding. The district's MOE report is one source of documentation for this requirement. In addition, during the Comprehensive Needs Assessment Process and the development of the district and school level improvement plans, this requirement is addressed. All requests for purchases are also reviewed by the applicable program director to ensure that all the items or services are supplemental in nature.

In summary, for a cost to be allowable under a federal grant program, the district ensures that it meets all of the following conditions. A cost that does not meet all of these conditions could be questioned during an audit or monitoring visit and could require repayment to the awarding agency. The cost must be:

- reasonable in cost (as described above)
- necessary to accomplish the objectives of the grant program (as described above)
- based on an identified need, concern, or area of weakness within the grant program
- appropriate under the authorizing program statue
- consistent with the underlying needs of the program in that it benefits the intended population of students or teachers for which the funds are appropriated
- allocable to the grant based on the relative benefits received (as described above)
- authorized or not prohibited under state or local law or regulations
- consistent with policies, regulations, and procedures that apply to all activities, including other grants and state and local activities
- treated consistently as either direct or indirect cost
- determined in accordance with GAAP
- not used to meet cost sharing or matching requirements of another federal grant (unless specifically permitted in the other program statute or regulations)
- consistent with the terms and conditions of the grant award (adheres to period of performance)
- budgeted in the approved grant application

- adequately documented with appropriate supporting original source documentation
- the net of any applicable credits such as rebates or discounts
- allowable under the federal cost principles
- in most cases, supplemental to the core foundation program of the school and to other activities normally conducted by the school (i.e., supplement, not supplant)
- if the school is a Title I schoolwide program, the grant program's activities and applicable costs must be included in the schoolwide plan, the school must have conducted a comprehensive needs assessment, and the plan must contain the required components specified in statue (see Title I, Part A §1114[b]).

District personnel responsible for spending federal grant funds and for determining allowability must be familiar with the Part 200 selected items of cost section. District employees are required to follow these rules when charging these specific expenditures to a federal grant. In addition to checking the selected items of cost in Part 200, district staff must check costs against GaDOE's Guidelines Related to Specific Costs, local district policy, and any grant program restrictions to ensure the cost is allowable.

With each requisition/purchase order, the Tattnall County School District has a built-in multiple approval process in the Informa Software that includes the program/grant manager and fiscal staff. Each approval level views the request for intent and purpose, reasonable, necessary, allowable and allocable before approval is granted. If the requisitions do not meet these guidelines, the Federal Programs Director/Director of Consolidated Funds denies the requisition and it is returned to the principal. The Federal Programs Director monitors each federal budget to ensure that all purchases are allocable. If one is noted, the Finance Director is notified and the expense is removed from the expenditure email.

Costs That Require Special Attention

In addition to the aforementioned, certain types of costs may be allowable under federal law but may not be allowable under state law or guidelines, or may only be allowable under certain circumstances and conditions. GaDOE's General Guidelines for the Use of Title I Funds and Equipment outlines several other types of costs that require special attention due to the fact that some costs frequently cause audit exceptions or monitoring findings.

The Tattnall County School District makes every effort to comply with these guidelines in the expenditures of federal grant funds to avoid audit exceptions. District employees engaged in federally-funded activities are required to consult this document regularly and be familiar with its contents. When applicable, the program/grant manager will coordinate with the finance department before any expenses requiring special attention are expensed and will together consult the guideline related to specific costs.

Cash Management and Drawdown of Funds

The Finance Department is responsible for all cash and cash flow management. Funds are drawn down on a reimbursement basis for all allowable expenditures incurred in their respective

participating Federal Program(s). It is the responsibility of each Program Director and the Finance Director to work together to review all program expenditures before funds are drawn down from GAORS. The source documents that are required for Drawdown of Funds are assembled together into a packet for review. They are (1) COF Master Budget Template, (2) copy of expenditure reports sorted by school, function and object that are used as the source for numbers entered on the COF Master Budget Template, and (3) signature sheets that document review and approval of documents in the packet; this must be signed and returned to the Finance Director. Upon receipt of approved and signed packet, funds are requested via GAORS through submission of a DE0147. Appropriate journal entries are posted to the financial system from documents produced via the COF Master Budget Template process. The following steps are followed for federal drawdowns:

Submission of Expenditure Reports

The following steps are conducted in submitting expenditure reports:

- Drawdowns are made based on expenditures that have been paid.
- The Finance Director will run an expenditure detail report for COF fund 150, sort by school, function and object, complete the COF Master Budget Template spreadsheet and attach the detail account expenditure reports to be forwarded to the Program Director. The COF Master Budget Template spreadsheet has been designed and developed to hold the detailed budget by function and object, total expended, percentage of that expenditure charged to each consolidated program and state and local, amount previously received for each consolidated program and state and local, and current amount to request; this excel workbook holds the information in both totals by funding programs and in detail by facility. This source document allocates amounts to each program for drawdown requests and prepares the journal entries required to be posted to the financial system.
- The Program Director will review the request against detail expenditure reports and will sign to approve. The request is then forwarded to the Superintendent for review and approval.
- The packet is then returned to the Finance Director for drawdown.
- The DE 0147 request for payment is prepared and signed off electronically on GAORS.
- All drawdown reports are kept on file by the Finance Director.
- All funds received are posted to the cash receipts journal and reconciled by the Finance Director.
- Drawdowns will be requested to ensure timely reimbursement of amounts expended in the respective participating Federal Programs.

If Tattnall County School System is found to have spent funds inappropriately or has drawn down more money than spent, the funds will be refunded to the GaDOE and documentation will be recorded as to the reason for this error. If we are found to have earned interest over \$500 due to excess drawdown of funds during the period of performance, Tattnall County School System will remit the additional interest earned.

If the program specialists from GADOE notify the Tattnall Federal Programs Directors that the percentages of drawdowns for any grant is not enough for the time of year, the individual

program directors will forward the email to the Tattnall County Finance Director so that she can correct the situation.

Internal Controls

Effective control and accountability must be maintained for all funds, real and personal property, and other assets. This means recipients must implement controls that adequately safeguard grant property and ensure such property is used solely for authorized purposes. Internal controls are defined as "a process effective by an entity's oversight body, management and other personnel that provides reasonable assurance that the objectives of the entity will be achieved." The internal controls are the policies and procedures used to ensure that the organization's mission, strategic plan, goals, and objectives are achieved.

The objectives and corresponding risks fall into one or more of the following categories:

- **Operations:** effectiveness and efficiency of operations
- **Reporting:** Reliability of financial report both internally and externally
- Compliance: Compliance with applicable laws and regulations

Internal control consists of five interrelated components as follows:

- Control environment
- Risk assessment
- Control activities
- Information and communication
- Monitoring

All five internal control components must be present to have effective internal controls.

General

The Tattnall County School System has established procedures to maintain internal controls over all assets. The purpose of internal controls is to provide a reasonable assurance that the District will accomplish its objectives of safeguarding assets, providing reliable financial information, promoting operational efficiency and ensuring compliance with laws, regulations and established district policies and procedures.

Internal Controls (Uniform Guidance §§200.303)

The following internal controls have been created and designed to provide reasonable assurance regarding the achievement of objectives in the compliance with applicable laws and regulations.

Segregation of Duties

The Tattnall County School System (TCSS) requires the following segregation of duties associated with cash management to prevent errors and fraud.

Finance Director

Under the supervision of the Superintendent, the Finance Director will carry out the following duties:

- Manage preparation of financial statements for inspection by the Board of Education.
- Establish accounting procedures to ensure that proper internal controls are maintained for the district business office
- Manage cash flow and investment of available funds.
- Manage the preparation of financial data for the tax digest, state allotments, and other financial areas.
- Oversee the reconciliation of all accounts.
- Supervise operation of business office to include payables and payroll.
- Compile annual budget for board approval, manage entry of budget into accounting system, and submit to the Georgia Department of Education.
- Coordinate accounting procedures to ensure that central office and local school administrators follow proper procedures in the budgeting, record keeping, and expending of program funds for which they are responsible.
- Oversee and approve monthly and year-end adjustments, run and balance reports, and oversee closure of books at month and year end.
- Prepare and submit year end and interim financial reports to the Ga Department of Education.
- Manage funds for SPLOST, Capital Projects and Debt Service.
- Ensures a yearly audit is completed and submitted to the Department of Audits and Accounts.
- Compile data for audit, work with state auditors during audit, and prepare MD&A for audit report.
- Perform Immigration Reporting to the Department of Audits and Accounts.
- File 1099's with IRS for applicable payments to vendors.
- Submit annual completion reports on all federal and state grants.
- Process receipts.
- Ensure drawdowns are based on actual expenditures and minimizing the time between the transfer of funds.
- Request federal and state grant reimbursements
- Perform other duties as assigned by the Superintendent.
- Monitor all purchases to ensure that expenditures are allocable,

reasonable, and necessary. Ensuring all system policies for purchasing, expending funds, and inventorying equipment are followed to avoid fraud, waste, abuse, and corruption. No items will be purchased without prior approval, and all items purchased must be a part of the approved budget.

• Meet with the Business Office staff as needed and request financial reports to ensure alignment and balance on at least a monthly basis

Assistant Finance Director

Under the supervision of the Finance Director/Director of Consolidated Funds, the Assistant Finance Director will carry out the following duties:

- Assist in the implementation of accounting procedures by maintaining accurate records and internal controls throughout the system and ensuring compliance with all applicable regulatory requirements.
- Perform journal entries, budget adjustments, and bank reconciliations.
- Assist the Finance Director/Director of Consolidated Funds with account analysis, report preparation and distribution, and month-end /year-end closeout procedures.
- Maintain a wide variety of financial records to ensure compliance and the availability of documentation.
- Perform payroll accruals and reversals.
- Assist with any duties required for annual audit preparation.
- Issue purchase order numbers and encumber amounts on financial accounting software program.
- Submit finalized purchase order to vendor.
- Match invoice and receipt information, resolve discrepancies and set up payable.
- Perform other related duties as assigned by the Chief Financial Officer.

Payroll Supervisor

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Under the supervision of the **Finance Director**/Director of Consolidated Funds, Payroll will carry out the following duties:

- Process monthly payroll and reporting for all system employees.
- Invoice for any payroll reimbursements.
- Prepare year-end reporting, including W-2's.
- Calculate sick leave for retirement.
- Assist with budget preparation.
- Download and enter CPI information for payroll purposes.
- Prepare quarterly tax reporting.
- Perform other duties as assigned by the Chief Financial Officer/Director of Consolidated Funds.

Director of Consolidated Funds/Federal Programs Director

- Request/Sign to approve federal grant reimbursements
- Perform other duties as assigned by the Superintendent.
- Coordinate, monitor, and provide technical assistance to schools for Title I, Part A.
- Monitor all purchases to ensure that expenditures are allocable, reasonable, and necessary. Ensuring all system policies for purchasing, expending funds, and inventorying equipment are followed to avoid fraud, waste, abuse, and corruption. No items will be purchased without prior approval, and all items purchased must be a part of the approved budget.
- Approves each purchase requisition/order, travel expense statement and professional learning (PL) leave that is funded through Federal Programs. Meet with the Business Office staff as needed and request financial reports to ensure alignment and balance on an as needed needs basis. Meet with and/or emails principals or designees to ensure accuracy of school budgets.
- Aligns requisitions with program purpose and LEA's prioritized of SIP
- Ensure system and school inventories are maintained and kept up to date.
- Complete a physical inventory check at each facility each year and verify the location of those assets.
- Ensure each employee is trained on his/her responsibility regarding fraud and the channels to report it if suspected annually

Title II/Title III/ESOL/Immigrant Coordinator; Homeless Liaison; Migrant Education Coordinator; CARES Coordinator

Under the direction of the Director of Consolidated Funds, the following duties are performed:

- Ensures compliance with all applicable guidelines.
- Provides technical assistance when needed.
- Assists in the implementation of accounting procedures by maintaining accurate records and internal controls throughout the system and ensuring compliance with all applicable regulatory requirements.
- Assists processing purchase requisitions verifying available funds for accounts charged to system accounts, and payment of invoices.
- Reviews financial information for potential budget variances and ensures fund balances are accurate.
- Approves purchase requisitions, employee expense statements, and registration payments for compliance and accuracy.
- Assists with the development of grant proposals. Performs the

needed administrative tasks for effective implementation of several federal and state sponsored programs and other grant management tasks as assigned. Assists with database activities related to the financial system. Assists auditors by providing supporting documentation and/or information on internal processes (including financial documents, professional learning documentation, and all Title III, Migrant, Immigrant, Homeless, ELs cross functional monitoring. Final approval on all professional learning is completed by the Director of Consolidated Funds who ensures that all are research based.

• Assists in maintenance of equipment inventory and ensures compliance to BOE disposal policy.

Director of Special Education

Under the supervision of the Director of Consolidated Funds, the Director of Special Education will carry out the following duties related to IDEA, CEIS, and Special Needs Pre-k:

- Reviews detail and summary reports for potential budget variances and ensures fund balances are accurate.
- Approves purchase requisitions, travel expense statements, and registration payments for compliance and accuracy.
- Manages applicable Consolidated Application budgets.
- Assists with database activities related to the financial system.
- Ensures the special education inventory is accurate.
- Assists auditors by providing supporting documentation and/or information on internal processes (including financial documents, professional learning documentation, equipment inventory, and all IDEA monitoring documents).

CTAE Director

Under the supervision of the Director of Consolidated Funds/Finance Director, the CTAE Director will carry out the following duties related to Carl Perkins grants. Working with the Director of Consolidated Funds/Finance Director, the CTAE director:

- Maintains accurate records and internal controls (e.g. ledgers) ensuring compliance with all applicable regulatory requirements and accuracy of fund balances (object codes).
- Processes purchase requisitions verifying available funds for accounts charged to system accounts, and payment of invoices.
- Reviews financial information for potential budget variances and ensures fund balances are accurate.
- Maintains a wide variety of financial records to ensure compliance and the availability of documentation.
- Approves purchase requisitions, travel expense statements, and registration payments for compliance and accuracy.

- Assists with the Consolidated Application budgets.
- Ensures drawdowns are accurate.
- Assists with database activities related to the financial system.

Equipment (Uniform Guidance 200.313)

Tattnall County Federal Inventory Internal Controls

Inventory management is an essential element for the control and accountability of federal, state, and local funds. Internal controls are in place to safeguard funds, property, and other assets from unauthorized use or disposition. Maintenance procedures keep the property in working condition and extend the life of the equipment through preventative maintenance and internal technology repair services.

Inventory items purchased with federal funds are divided into the following categories: real property, equipment, pilferable items, and supplies. All equipment, that is, any nonexpendable, tangible property having a useful shelf life of more than one year must be included in an inventory. This includes pilferable items, equipment that is considered small items easily lost or stolen. Even though supplies, consumable items, with a shelf life less than a year, are not required to appear on an inventory, adequate internal control procedures ensure the supplies purchased with federal funds are used for the intended purpose of the program.

The maintenance of an inventory of equipment is an essential component of internal control. Written procedures for inventory control address the following areas:

- Acquisition of equipment including replacement equipment
- Guidance on maintaining the LEAs inventory management system
- Off-site use of equipment
- Physical inventory
- District equipment disposition procedures
- Supplies disposition
- Adequate safeguards related to loss, damage, or theft of equipment
- Equipment use for private schools
- Safeguards against loss from unauthorized use or disposition

Pilferable (Walkable) Items

Pilferable items are defined as those items that may easily be lost or stolen. Items considered to be pilferable items and purchased with federal funds must now be included on any inventory report. Pilferable items include, but not limited to: cell phones, iPads, tablets, iPods, graphing calculators, software, projectors, cameras, camcorders, DVD players, computer equipment, and televisions.

Acquisition/Requisition of Equipment & Supplies:

Inventory management procedures begin with a process of determining the need and use of the equipment. All equipment purchased with federal funds are in accordance with the regulations of the funding source. Procedures are in place to ensure the purchase of equipment, paid for with federal funds are necessary, reasonable, allocable, and allowable. Once purchased, the equipment must continue to be used for that or a related purpose.

The requisition for the purchase of equipment follows the LEAs internal control procedures. Procedures are in place to ensure prior approval of all purchases, as well as directions for receiving the equipment and issuing the equipment to the proper locations. Any equipment, materials, and/or supplies purchased with federal funds are considered solely for the use of that program, for authorized purposes of the property during periods of performance, or until the property is no longer needed for the purpose of the project.

As of FY22, Tattnall County School System has consolidated Title IA, Title IA Family Engagement, Title IA School Improvement, Title IC K-12 funds, Title IIA, Title IIIA, Title IVA, IDEA 611 and 619, and Title VB with state and local funds. Therefore, purchases made from this point on are not required to be on a federal inventory (except for items purchased by CARES/ESSER grants). These items are recorded on the general inventory in each media center because these purchases are treated like local funds. No replacement equipment is being ordered with federal funds.

The principals are given their Consolidation of Funds allocations at the beginning of the year. They use their School Improvement Plan as the basis for all activities and purchases for the year. The principals are provided technical assistance with their budgets by the Federal Programs Director and Finance Department. Principals provide input during the summer on items needed for their upcoming budget. The LEA staff combines each school's funding allocations and requests budget approval from the BOE. Once the budgets are approved, the principals or their designees (academic coaches or media specialists) submit requisitions via Informa to the Federal Programs Director. The Director will check each SIP and budget and either approve or deny the requisition. Denied requisitions are returned to the principal or designee via Informa. Approved requisitions are forwarded with the correct account information to the LEA Finance/Purchasing Dept. for processing. The LEA Finance Department processes the order, assigns a purchase order, and submits the order to the vendor. The Federal Programs Director/Finance/Purchasing Dept. informs the academic coach, principal, and media specialist when items are processed with federal funds. Once the equipment/supplies arrive, the packing slip is signed and dated by the academic coach or media specialist, and it is returned via email or inter-office mail to the LEA Finance Department for the completion of the voucher packet. The completed voucher packet is emailed to the Federal Programs Director who will then, in turn, email it to the academic coach, principal, and media specialist at each school. This will include the PO number and cost per item.

At the school level, the media specialist uses the information from the voucher packet and items received to list each applicable item on the federal inventory spreadsheet and also into the school media catalog for reference and circulation. Items are barcoded with tracking identification that is associated with the inventory record. If the media specialist has noted any missing information, she will contact the Accounting Clerk, Technology Director, or Federal Programs Director directly.

The media specialist will keep the current equipment inventory, technology inventory (1000 615 and 1000 616) and books ordered for the media center for student check out (1000 642). The academic coach will keep up with the inventory of supplies (1000 610 and 1000 611) and books ordered for teachers (1000 641 and 1000 642).

After materials are processed for inventory, they are checked out by the teacher/program intended or available to be checked out by federal teachers. If the equipment is delivered to the BOE for additional setup, the equipment is signed for, and the media specialist is given a copy of the voucher packet and notified that the equipment will be arriving to her school in a timely manner.

Method for entering information into the LEA's inventory management system

1. All equipment is properly labeled (barcoded) for inventory tracking by the media specialist within one week of receiving. The label should mark the equipment with the appropriate federal program name and include the fiscal year of purchase and property of the respective LEA.

2. The school retains 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 is kept current and available for review and audit. 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:

- A **description** of the equipment.
- A serial number, model number, or other identification number.

• The **funding source (including the FAIN) and percentage (who holds title)** under which the equipment was acquired. *Note*: Equipment purchased with federal funds shall be identified to indicate federal ownership by specific federal program (e.g., items purchased with Title I Part A monies must be marked as Title I, Part A with grant award year.) FAIN numbers are located on the Grant Award Notice (GAN) document in the upper right box #2.

- The source of property (vendor).
- The acquisition date and unit cost.
- The present **location** of the equipment.

• Indication of the **use** of the equipment. For example, instruction, professional learning, parent and family engagement, administration, etc.

• The **condition** of the equipment.

• The **date** the information was added to the inventory.

• Who holds **title** to the equipment? If funds from more than one program were used to purchase the equipment, then each program is listed as the title, and if possible, notation of percentage should be listed.

• All pertinent information on the final transfer, replacement, or **disposition** of the equipment (including the date of disposal and sale price of the equipment).

4. Inventory is updated as equipment items are purged or new purchases are made.

5. Equipment items purchased with federal funds are identified and physically marked as noted above.

6. Adequate safeguards must be in place related to the loss, damage, or theft of the equipment. Any loss, damage, or theft should be investigated and fully documented.

7. Adequate maintenance procedures are practiced to keep the equipment in good condition.

Off-site use of equipment

Any equipment used off-site is signed in and out on the off-site equipment form. The media specialist at each school maintains this log. If a request is made for the use of off-site equipment, the media specialist or school administrator will determine the reason for the request and if it is reasonable to carry out the intent of a federal program. If the media specialist/administrator determines that it is a valid use of the equipment, she will have the person sign for it on the log when checking out and returning the equipment. The condition of the equipment when checked out and returned is noted. A sample form is provided in this manual that includes documentation of the date the equipment was taken off-site, use of the equipment, the person responsible for the equipment use, date the equipment was returned and the condition of the equipment on return.

Physical Inventory

A physical inventory of equipment purchased with federal funds shall be taken by each media specialist and the results reconciled with the equipment records at least once every two years in accordance with 2 C.F.R. Part 200.313 (d)(2). Any differences between quantities determined by the physical inspection and those shown in the accounting records shall be investigated to determine the causes of the difference. The recipient shall, in connection with the inventory, verify the existence, current utilization, continued need for the equipment and condition of the equipment. Documentation shall be maintained of the date and the person conducting the physical inventory. Adequate maintenance procedures shall be implemented to keep the equipment in good condition.

The Tattnall County Federal Programs Director conducts a physical inventory monitoring at each school annually. The media specialist at each school provides the Federal Programs Director with a list of items purchased with federal funds. The Federal Programs Director highlights several items and then locates them with the assistance of the media specialist. Items that cannot be found are noted and then located.

Maintenance procedures keep the property in good condition and extend life on equipment through preventive maintenance and technology repair services from the technology department. Staff report items needing repair through an electronic ticketing software (Spiceworks). The school media specialist and the district technology support specialist receive an email to notify them that a ticket has been submitted. The ticket remains open until the item has been repaired. Once the repair is complete, the ticket is closed. Media specialists assist with minor repairs and connectivity issues. A district technology hardware support.

Tattnall County has standardized on purchasing Dell computers with a three year, on-site warranty. This plan streamlines our repair service and enables us to keep our systems in good working condition. Pricing is always negotiated and well below state contract pricing.

Monitoring of Physical Inventory

LEAs receiving federal funds are responsible for 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. These federal regulations and requirements also require the state educational agency (SEA) to monitor the implementation of program requirements and expenditures of federal funds.

The audit requirements of 2 C.F.R. Part 220.501 state that a non-federal entity that expends \$750,000 or more during the non-Federal entity's fiscal year in federal awards must have a single audit conducted in accordance with \$200.514 Scope of audit except when it elects to have a program-specific audit conducted in accordance with paragraph (c) of this section.

Below are persistent inventory findings from A-133 Single Audits, U.S. DEPARTMENT OF EDUCATION Program monitoring, Office of Inspector General (OIG) and Department Cross-Functional Monitoring are listed below.

- · Purchasing unneeded supplies of equipment
- Purchasing goods at inflated prices

The Federal Programs Director or designee will check the physical inventory at each school once a year. The verification of inventory includes the existence, current utilization, continued need for the item, and physical checklist. The media specialist at each school is responsible for maintaining an accurate inventory of federal purchases for equipment, technology, and books purchased for student use in the media center. The academic coach will maintain an inventory of supplies or books ordered for teacher use. The Federal Programs Director is responsible for maintaining the BOE Federal Inventory each year. The technology director will assist the Federal Programs Director as needed. The media specialist and Federal Programs Director/designee will sign off on the inventory yearly. Any discrepancies will be noted in writing and researched. Stolen items may require a police report. Lost items will require the signature of the media specialist and principal. Items needed to be surplused will be placed on the surplus form and forwarded to the Federal Programs and technology director.

District Equipment Disposition Procedures

According to 2 C.F.R. Part 200.33, equipment is defined as an article of nonexpendable, tangible personal property (including information technology systems) having a useful life of more than one year and an acquisition cost which equals or exceeds the lesser of the capitalization level established by the non-profit organization for financial statement purposes, or \$5,000. (See also 2 C.F.R. Part 200.12 Capital assets, 2 C.F.R. Part 200.20 Computing devices, 2 C.F.R. Part 200.48 General purpose equipment, 2 C.F.R. Part 200.58 Information technology systems, 2 C.F.R. Part 200.89 Special purpose equipment, and 2 C.F.R. Part 200.94 Supplies.)

LEAs must develop and maintain controls to ensure that all property with federal funds is purchased in accordance with the LEA's procurement procedures and that adequate controls are maintained to safeguard all equipment purchased. Therefore, an inventory shall be maintained for all tangible property with a useful life of one year, regardless of the acquisition cost. LEAs are not required to track consumable items, but are required to maintain an inventory of items such as computers, DVD players, projectors, cell phones, etc.

1. Equipment items with an acquisition cost/current per unit fair market value of less than \$5,000 and are more than three years old may be retained, sold or disposed of, with no further obligation to GaDOE. The disposition of such items should be so noted on the equipment inventory maintained by the LEA.

2. Equipment items with an acquisition cost of \$5,000 or more may be retained or sold, and the awarding agency (GaDOE) shall have a right to amount calculated by multiplying the current market value or proceeds from the sale by the awarding agency (GaDOE's) share of the equipment.

The LEA determines the lifecycle of equipment and depreciation based upon its initial cost, purpose, usage, location, replacement cost, and other local factors. When original or replacement equipment as acquired with federal funds is no longer needed for the original project or program, the equipment may be retained, sold or disposed of, if it is not needed in any other federally funded project or program. If it is needed in another federal program, the media specialist completes the transfer of equipment form and sends a copy to the Technology Director, Federal Programs Director, and Media Specialist at the transferring school. The LEA will need to ensure that records are kept and made available for monitors and auditors as to where the equipment was transferred. The Federal Programs Director and Technology Director maintain control of

disposition and transferring of federal equipment and the requirements for training media staff on inventory controls.

Miscellaneous

When acquiring replacement equipment, the recipient may use the equipment to be replaced as a trade-in or sell the equipment and use the proceeds to offset the cost of the replacement equipment, subject to the approval of the state or the awarding federal agency. If the equipment is sold, then the proceeds must be handled as stated earlier in the Disposition section.

If an item of equipment has been damaged, destroyed, lost, or stolen, an official investigation by the proper authority should be conducted and fully documented. A copy of this report must be kept on file in the district office and the schools' administrative office, usually the principal's office.

Permission to dispose of items from inventory will be granted, in writing, following review and approval of the inventory report by the district' federal program office. A specific grant recipient is responsible for replacing destroyed, lost, or stolen equipment and repairing damaged equipment.

When the media specialist, academic coach, technology director, or Federal Programs Director determines that federally purchased equipment is in need of disposal, one of these four will list the items on the surplus form and then forward a copy of the list to the Federal Programs Director and Superintendent's Administrative Assistant for BOE approval. A copy is also forwarded to the Technology Director. The Superintendent's office requests final approval of disposition from the Board of Education. Once items are approved for surplus, they are offered to an approved vendor for recycling. The Tattnall County School Properties Disposal Procedures Policy is followed.

The disposition of such items is noted on the equipment inventory maintained by the school. The recipient should include the date of disposal and sales price or the method used to determine current fair market value if the recipient compensates the state.

Supplies Disposition

Supplies are addressed in 2 C.F.R. § 200.94. Supplies are any tangible personal other than those described in § 200.33 Equipment. A computing device is a supply if the acquisition cost is less than the lesser of the capitalization level established by the non-federal entity for financial statement purposes or \$5,000, regardless of the length of its useful life. Supplies are generally considered consumable items. These items would generally have a shorter life span than equipment which is kept for recurring use. Therefore, supplies do not have to be recorded in an inventory management system. See also 2 C.F.R. Part § 200.20 Computing devices and 2 C.F.R. Part § 200.33 Equipment.

Even though supplies are not required to be part of the inventory management system, the schools have adequate internal control procedures that include a process for labeling and locating property, including supplies, purchased with federal funds. The information maintained about supplies purchased with federal funds will provide documentation to prove all costs are necessary, reasonable and allocable.

Procedures are in place for 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 grantee of sub-grantee shall compensate the awarding agency for its share.

The media specialist, academic coach, ESOL lead teacher, federal teacher, technology director, MFOC, and Federal Programs Director receives supplies purchased at each school or the BOE. The person receiving signs off on the delivery and emails the signed and dated invoice to the Finance Dept. within 24 hours. Once the voucher packet is compiled by the Finance Dept and forwarded to the Federal Programs Director and principal, academic coach, and media specialist, the item is placed on the media specialist or academic coach's inventory and placed in the correct federal programs classroom/area. The academic coach is responsible for the teacher supplies/teacher books inventory and the media specialist is responsible for the technology, equipment, and media center books purchased with federal funds. When the supplies are no longer needed, they may be offered to another program for its use and the inventory will be transferred. When supplies are deemed worn-out or no longer useable, they may be surplused following standard procedures.

Loss, damage, or theft of equipment

2 C.F.R. Part 200.313 (d)(3) requires that a control system be developed by recipients of federal funds to ensure that there are adequate safeguards to prevent loss, damage, or theft of the property, including real property, equipment, and pilferable items.

These Tattnall County procedures to provide adequate safeguards to prevent loss, damage, or theft of the equipment include the following:

- Locks or security camera (for particularly valuable or vulnerable items), locked teacher cabinets, mobile device carts, property identification stickers, and locked classrooms.
- Access controls to secure media center storage areas to limit entry by unauthorized personnel
- Use of logs or sign-in sheets for certain items of property, for example, iPads, laptops, cameras, projectors
- Procedures for promptly entering items received into the inventory management system
- Process for investigation of any loss, damage and/or theft of equipment. Any loss, damage and/or theft of equipment purchased with federal funds should be reported to the LEA level federal program staff.

• Documentation of notification of loss, damage or theft of equipment and, if appropriate, any police reports. Two sample report forms are provided.

All equipment purchased with federal funds is placed on the media specialist inventory, academic coach inventory, or the BOE inventory. The media specialist assigns to each user the equipment purchased with federal funds each school year. The condition is noted at both times. Any equipment not returned is processed as lost (requires principal and media specialist signature) or stolen (suggested police report). The inventory is checked and updated annually.

Equipment Use for Private Schools

At this time there are no private schools located in Tattnall County nor are any participating in Title I Should a private school decide to participate in the future, the following procedures will be followed:

Funds from several federal programs may be used to purchase materials and equipment to meet the needs of participating (students eligible to receive services) private school students.

Equipment used by the private school, the LEA purchasing the equipment retains the title and must continue to account for the equipment in its inventory management system.

The LEA shall maintain an inventory of all materials, equipment, and property purchased with federal funds for use with eligible students at private schools. The inventory shall contain the same requirements for any equipment purchased with federal funds. These requirements are:

- A description of the equipment.
- A serial number, model number, or other identification number.

• The **funding source (including FAIN) and percentage** under which the equipment was acquired. *Note*: Equipment purchased with federal funds shall be identified to indicate federal ownership by specific federal program (e.g., items purchased with Title I Part A monies must be marked as Title I, Part A with grant award year.)

- The source of property (vendor).
- The acquisition date and unit cost.
- The present **location** of the equipment (school, classroom, etc.).
- Indication of the **use** of the equipment instruction, professional learning, parent and family engagement, administration, etc.
- The **condition** of the equipment.
- The **date** the information was added to the inventory.
- Who holds **title** to the equipment?
- All pertinent information on the final transfer, replacement, or **disposition** of the equipment (including the date of disposal and sale price of the equipment).

1. Inventory must be updated as equipment items are purged or new purchases are made.

2. Equipment items purchased with federal funds are to be identified and physically marked as noted above.

3. Adequate safeguards must be in place related to the loss, damage, or theft of the equipment. Any loss, damage, or theft should be investigated and fully documented.

4. Adequate maintenance procedures should be implemented to keep the equipment in good condition.

5. A physical inventory of equipment items must be taken and the results reconciled with the inventory records at least once every two years.

The LEA would follow the same disposition plan for the equipment purchased for participating private school students as with any equipment purchased with federal funds in the public school.

Procurement (Uniform Guidance 200.318)

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

- Incorporating a clear and accurate description of the technical requirements for the material, product, or service to be procured. The description must not, in competitive procurements, contain features which unduly restrict competition. The description may include a statement of the qualitative nature of the material, product or service to be procured and, when necessary, must set forth those minimum essential characteristics and standards to which it must conform if it is to satisfy its intended use.
- Avoid providing detailed product specifications.
- When it is impractical or uneconomical to make a clear and accurate description of the technical requirements, a "brand name or equivalent" description will be used as a means to define the performance or other salient requirements of procurement. The specific features of the named brand which must be met by offers will be clearly stated.
- Identify all requirements which the offers must fulfill and all other factors to be used in evaluating bids or proposals.
- Completing a cost or price analysis for orders/contracts over \$150,000 to evaluate each separate cost element including profit.
- Ensure that all prequalified lists of persons, firms, or products which are used in acquiring goods and services are current and include enough qualified sources to ensure maximum open and free competition. Also, the school system will not preclude potential bidders from qualifying during the solicitation period.Each federal program coordinator and/or department head checks System for Award Management (SAM) web site, https://www.sam.gov/portal/SAM/ prior to approving any purchase in excess of \$25,000 to ensure the vendor is not on the list of suspension and debarment.

Domestic Preferences for Procurements (CFR 200.322)

- (a) As appropriate and to the extent consistent with law, the non-Federal entity 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).
 - The requirements of this section must be included in all subawards including **all contracts** and **purchase orders** for work or products under this award.
 - Based on the above statute, a statement on all purchase orders and contracts, states "To the greatest extent practicable, the Tattnall County district provides a preference for the purchase of goods and materials produced in the U.S."

Purchases Procedures for Purchases Requiring Bids

In spending School District funds, employees of the School District shall engage in comparative buying and obtain bids and quotes whenever appropriate. Purchases shall be made with effort to provide the least expense to the system. Evidence of the quotations or bids will be furnished to the office of the Superintendent or his/her designee. The Tattnall County Board of Education has the responsibility of awarding all formal sealed bids and requests for proposals and reserves the right to reject any and all bids when obtained.

Methods of Procurement

The following methods will be used in the procurement of goods and services:

- Micro Purchases (\$9,999 and under) A quote from a qualified vendor will be obtained if the price is considered to be reasonable.
- **Small Purchases** (\$10,000-\$250,000) Quotes from at least two qualified vendors will be obtained and reviewed before purchase.
- **Purchases over \$250,000** Sealed Bids (formal advertising) or Competitive Proposals will be obtained from qualified vendors as outlined in CFR 200.320 (c) and (d).
- Non-Competitive Proposals/Sole Source (CFR 200.320 (f))- large purchases (over \$250, 000) can be made means of noncompetitive procurement only if:
 - The acquisition of property or services, the aggregate dollar amount of which does not exceed the mircro-purchase threshold;
 - The item is available only from a single source;
 - The public exigency or emergency for the requirement will not permit a delay resulting from competitive solicitation;
 - The Federal awarding agency or pass-through entity expressly authorizes noncompetitive proposals in response to a written request from the non-Federal entity;
 - After solicitation of a number of sources, competition is determined inadequate.

Formal Sealed Bids

The following requirements must be met in all instances in which formal, sealed bids are invited:

• Written specifications are to be provided to the bidder.

- Clear instructions are to be provided to all bidders in writing.
- No changes are to be made to specifications or instructions verbally unless followed up with a written amendment to the original information to all known bidders.
- In the instance that a low bid is rejected and another accepted, a statement will be attached to the low bid documents specifying the reason or reasons the low bid was rejected.
- After bids are opened, a vendor is not to be contacted for the purpose of negotiating a better deal. The bidding process is to be considered complete when the bids are opened, however the Board and its employees reserve the right to request clarification of any item to which the vendor responds.

Request for Proposal

In instances where a request for proposal is required, a packet will be prepared for vendors. The information packet will include, at minimum, general information about the equipment, supplies, or service needed, performance specifications, terms and conditions, and proposal instructions. The proposals will be submitted to the office of the Superintendent or his/her designee and will be evaluated on best value.

Written & Verbal Quotations

If written or verbal quotations are used, personnel should attempt to obtain quotes from at least three different vendors, if possible. Written quotations shall be kept on file for review by the Superintendent or his/her designee. If verbal quotations are used, personnel should keep a record of the address, phone number and representative of the vendor, the date and time of the conversation, and the amount of each quote.

Consultants, Contracts, Purchased Services for Federal Funds

Contracts are required for all consultants and purchased services. Agreements are entered into between the Tattnall County School System and the consultant. Each contract contains the following:

- Contracts are generated by appropriate federal program directors.
- Specific duties are specifically spelled out for each contract.
- The contract should specify services(s) being purchased/provided, when service must be delivered (date), names entering into contract, contract rate (total fee/per hour), timeframe of contract, method of payment, where services will be provided (location), signatures/date, and any other relevant information.
- The person must also submit to be fingerprinted if they are working with students.
- The contract includes the number of hours to work and the rate of pay.
- Principals must submit tutoring time logs based on the payroll deadlines from the Payroll Department. Each contract is signed by the following: contractor, and/or the appropriate federal program director. Each program director provides oversight in ensuring that all contractors' work is complete and that sub recipient requests have been evaluated before funds are released for reimbursement. Artifacts, daily sign in sheets, and completion of

all workshops are kept on file by the appropriate federal program director or Director of Consolidated Funds. The appropriate director signs off on all invoices/contracts prior to the issuance of payment for services. These contracts must be maintained and kept by the appropriate program director with a copy furnished to the Finance Director.

• Multiple year contracts should include the opt out clause to clearly state "if Title I funds are no longer available, the contract will be void".

Financial Reporting (Uniform Guidance 200.327)

The following internal controls have been created and designed to provide reasonable assurance regarding the achievement of objectives in the reliability of reporting for internal and external use. Copies of completion reports for the previous fiscal year will be kept on file in the Finance Department. Accounting records to support the results of outlays (expenditures indicated in the completion report will be kept on file in the Finance Department). Copies of expenditure (cumulative through) reports for the respective quarter for total expenditures reported to GaDOE will be kept on file in the Finance Department. Federal program coordinators will examine budget summary and detailed expenditure reports for their respective budgets. School principals are required to analyze budget summary reports at least quarterly.

Completion reports are annual reports required by the Georgia Department of Education (GADOE) for all grant funds. Reports are due thirty days after the end date for each grant. Prior to preparing the completion report, the general ledger report for each grant will be reviewed to ensure that all expenditure postings are correctly recorded.

Expenditure Detail reports will be generated for each grant by function and object codes. The Finance Director completes these steps in the system financial software: The Finance Director will run an account activity detail report in the system financial software for each grant to get all related expenses (July thru September of current year for grants ending on September 30th or previous July thru June for grants ending on June 30th). The Finance Director will send the report to the Director of Consolidated Funds for sign off.

Monitoring and Reporting Program Performance (Uniform Guidance 200.328)

The Tattnall County School System undergoes regular monitoring and audit visits as scheduled by the State of Georgia. Corrective action plans are created to reconcile any findings received. The school system will maintain the appropriate documentation to indicate that corrective actions have been completed and any findings have been cleared.

Steps to Audit/ Monitoring Resolutions:

- Once the audit/ Cross-Functional Monitoring report is received, the appropriate federal program coordinator will review all items. The Cross-Functional Monitoring report will be pulled from the GaDOE website under the Consolidated Application.
- Each item will be examined carefully, and a team of system level staff will determine the best means of corrective action.
- Items are gathered, and a report is written by the appropriate federal program coordinator.

- The report is submitted to the Superintendent.
- The completed report is then sent to the GaDOE state auditors as a means of resolution.
- The district has 30 days from the receipt of the findings to respond to the GaDOE

Subpart E-Cost Principles

Necessary, Reasonable and Allocable Costs (Uniform Guidance 200.403-200.405)

The following internal controls have been created and designed to provide reasonable assurance regarding the achievement of objectives in the compliance with applicable laws and regulations. Expenditure of federal funds must meet the clause of "allocable, reasonable, and necessary." When considering a purchase with federal funds, ask:

- a) Is the cost of goods or services chargeable or assignable to the federal award in accordance with relative benefits received (allocable)?
- b) Do I have the capacity to use what I am purchasing (reasonable)?
- c) Did I pay a fair rate and can I prove it (reasonable)?
- d) Does this expenditure exceed that which would be incurred by a prudent person under the circumstances prevailing at the time the decision was made to incur the cost (reasonable)?
- e) Is the proposed cost consistent with the underlying needs of the program (reasonable)?
- f) Do I really need this (necessary)?
- g) Do I need to spend these funds to meet the purposes and needs of the program (necessary)?
- h) Is this expenditure related to an identified area of need in an improvement plan (necessary, allowable)?
- i) Would I be comfortable defending this purchase (allocable, reasonable, and necessary)?

Compensation - Personnel Services (Uniform Guidance 200.430) Payroll

Program directors work with the Payroll Department to ensure payroll reports are accurate. In addition, each program director ensures that the number of federally funded employees is consistent with the approved application. Payroll reports, expenditure summary and detail reports, and substitute reports will be used to ensure that each object code is accurate.

Contracted Services

The Director of Consolidated Funds/Finance Director and applicable federal programs coordinators work with the HR Department and Payroll/Accounting Department to ensure compliance and accuracy. Each program coordinator ensures that contracts are fulfilled, budgeted correctly, and that services were provided in accordance with the purchased services contract.

Time and Effort

Charges to a federal fund for salaries and wages must be based on records that accurately reflect the work performed and account for total activity. A time sheet must be maintained by any employee who provides supplemental instruction outside of school hours. If state/local funds are consolidated with Federal funds and personnel are solely funded out of the consolidated fund pool, then Time and Effort documentation is minimized. For federal programs that are not consolidated, the appropriate program director/supervisor will ensure that the appropriate documentation is maintained and submitted to payroll for payment. School level personnel will submit time sheets to the building level administrator and a daily schedule is submitted to the program director to document time and effort. Also, one of the following will be maintained for all employees paid with federal funds:

• Semi Annual Periodic Certification

A semi annual periodic certification will be maintained for any employee who worked on one federal grant or one cost objective (job). These certifications will be completed afterthe-fact. The first certification will be completed on the last work day in December and the second periodic certification will be completed at the end of the school year on the last day of school (May). The forms are signed and kept on file in the office of the appropriate director. All substitutes, bus drivers, employees receiving stipends will be required to have a periodic certification completed. Currently, all substitutes are funded by the general fund or by the consolidated fund at each school. Payroll reports are utilized by the payroll department to verify that all periodic certifications are completed and the documentation is forwarded to the appropriate supervisor and program director for approval. The Semi Annual Periodic Certification is signed after the fact by the employee and supervisor and completed on individual or group form.

• Personnel Activity Report (PAR)

A PAR will be maintained for any employee who works on more than one federal grant and more than one cost objective (job). Split-funded personnel paid with federal funds are required to maintain monthly time logs. The logs are signed by the employee, supervising principal, and the appropriate federal program director who turns these into the payroll office. Monthly certifications are required. Personnel Activity Reports account for total activity and are signed after the fact by employee and supervisor. They coincide with one or more pay periods. If the PAR is incorrectly filled out, the appropriate federal programs director will provide technical assistance to correct. Reconciliations and adjustments must be completed by the end of the year so that the final amount charged to the Federal Award is accurate, allowable, and property allocated.

Capital Expense Funds (Uniform Guidance 200.439)

Capital Expenditures

Per 2 CFR 200.439(b)(2), capital expenditures for special purpose equipment are allowable as direct costs, provided that items with a unit cost of \$5,000 or more have the prior written approval of the program manager of the federal program whose funds will be used for this purchase. The process for receiving prior approval is as follows: 1) Tattnall County Federal Programs Director emails the federal program's manger a request for approval which includes the following: a) Equipment to be purchased including a description and intended use Unless otherwise noted, all references to ESSA in this document refer to the Elementary and Secondary Education Act of 1965 (ESEA), as amended by the Every Student Succeeds Act (ESSA).

b) Total unit cost of the equipment c) Statement how this equipment is an identified need and is included in the CLIP/SIP d) If this equipment is for private school use, state that the equipment will remain on the LEA's inventory log 2) Once approved by the program manager, the Federal Programs Director attaches the email granting approval to the Attachment Tab in the Consolidated Application Approved capital expenditures are budgeted using any of the 700 series object codes. Capital equipment cannot be claimed as indirect costs. Therefore, if the LEA claims indirect costs, all capital expenditures must be subtracted from the program's allocation prior to applying the restricted indirect cost rate.

Travel (Uniform Guidance 200.474)

Tattnall County Follows the State Travel Policy <u>https://sao.georgia.gov/travel/state-travel-policy</u>

Costs incurred by employees and officers for travel, including costs of lodging, other subsistence, and incidental expenses, must be considered reasonable, consistent, and otherwise allowable only to the extent such costs do not exceed charges normally allowed by the Tattnall County School System in its regular operations; the School System follows the Georgia Statewide Travel Policy set by the State Accounting Office. In addition, if these costs are charged directly to a federally funded source, documentation must justify that:

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

The following procedures are intended to ensure that charges are reasonable and consistent:

- A Request to Attend Conference Form must be submitted and approved before the employee registers for or attends out of county meetings, events or conferences. It must document dates, reason for attending, payment source for reimbursement.
- A travel expense form must be completed in its entirety in order to receive reimbursement for expenses after travel has occurred.
- Employees are responsible for ensuring that expenses claimed in the travel expense report are proper, accurate, and incurred for official business. A traveler who knowingly presents a false or fraudulent claim may be subject to penalties under criminal statutes.
- Once travel is approved and completed, the employee completes the Travel Expense

Statement and sends it to the principal for approval. The principal verifies the information on the form and signs. The form is then sent to the Federal Programs Director for approval (written).

- Completed Travel Reimbursement Form and applicable receipts and forms (Request to Attend Conference, Meeting Agenda, Hotel Receipt, Parking/other fees, Registration Fees) are forwarded to Accounts Payable for processing.
- Purpose of the trip must be included on the expense report.

Transportation

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

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

Parking fees and tolls paid may be reimbursed and employees are expected to obtain receipts for these expenses. If it is not possible to obtain a receipt, a written explanation should be included on the expense statement.

Lodging

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

- Lodging must be documented on a "Travel Expense Statement".
- Employees are responsible for making their own reservations and guaranteeing them.
- Employees are responsible for submitting a copy of the "Tax Exemption" form for state and local hotel/motel excise taxes if staying at a hotel in Georgia.
- Employees must travel more than 50 miles.
- Employees should use the least expensive rates for lodging. Any rate above this requires written authorization prior to the trip.
- Expenses must be broken down by date. Receipts are required.
- Any out-of-state travel must first receive the superintendent's approval.

Subsistence

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

- Meal reimbursement will be as follows: 1 meal per day (Breakfast \$13.00; Lunch \$14.00; Dinner \$23.00), 2 meals per day (Breakfast/Lunch- \$27.00, Breakfast/Dinner-\$36.00, Lunch/Dinner-\$37.00), 3 meals per day (Breakfast/Lunch/Dinner-\$50.00)
- Expenses must be broken down on the expense report per meal.

- Taxes and tips are allowed and should be included in the total. However, this total should not exceed the per meal rate.
- Per diem allowances are calculated based on the last location of the travel day. For nonovernight travel the calculation is based on the last business location. For overnight travel the calculation is based on the location of lodging for each night of travel. (Travelers traveling overnight in State must deduct 25% of the total per diem rate on the first and last day of travel.)
- The State of Georgia has adopted GSA rates for out of state travel, including \$5 incidentals. The in-state per diem rates do not include incidental expenses.
- Guidelines and definitions are included for Special Meals.

Expense Reimbursement

To receive expense reimbursement, the following guidelines must be followed:

- Employees must submit expense reports within 45 calendar days of completion of travel.
- Travel expense reports may be selected for audit at any time and all required receipts must be retained by the traveler for three years after the travel date if not attached to the expense report.
- All source documentation must be included.

Maintenance of Effort

The overall framework of MOE remains unchanged under ESSA. The Title I MOE rule (found in ESSA Section 1118 (a)) refers back to overarching MOE requirement that applies to most major programs under ESSA (found in ESSA Section 8521).

MOE means the district must maintain its expenditures for public education from state and local funds from year to year. A district cannot reduce its own state and local spending for public education and replace those funds with federal funds.

MOE is based on actual expenditures from State and local funds, not budgeted funds. The District is responsible for maintaining effort and for documenting compliance with MOE.

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 calculation in the GaDOE portal determines which funds should be excluded from the calculation. In determining whether an LEA has maintained fiscal effort, the district must analyze the LEA's expenditures from both state and local funds for free public education. Expenditures included:

- Administration
- Instruction
- Attendance and health services
- Pupil transportation services
- Operation and maintenance of plant
- Fixed charged

• Net expenditures to cover deficits for food services and student body activities

Eligible expenditures DO NOT include any expenditures for community services, capital outlay, debt services, or supplementary expenses as a result of a presidentially declared disaster or any expenditures made from funds provided by the federal government.

Documentation for MOE is only required for districts that do not meet the required maintenance of effort. The specific program director will work with the system's finance personnel to pull the MOE information from the Consolidated Application each school year for documentation purposes.

Comparability of Services

The Title I Director annually completes the Comparability of Services utility in the GaDOE portal. To date, all schools have always provided comparable services. In the event that comparability is not met, the Title I Director will work with the school system and school leaders to reassign personnel to ensure comparability of services to students in all Title I Schools.

Meeting Comparability through the Resource Allocation Methodology Process (RAMP)

A district may choose to use a district resource allocation plan process to meet the comparability requirement. This process involves the approval of the district's resource allocation plan by the GaDOE Title Programs Division. A districtwide resource allocation plan is based on student characteristics such as poverty, limited English proficiency, or disability, etc. As is allowed through the section 1120 A(c) of the Elementary and Secondary Education Act of 1965 (ESEA) which provides that an LEA my receive Title I, Part A funds only if it uses state and local funds to provide services in Title I schools that, taken as a whole are at least comparable to the services provided in the schools that are not receiving Title I funds. The district has an obligation to provide documentation that all resources available to the district are provided in an equitable manner to all of the schools in the district. Tattnall County School System's Finance Department develops the RAMP that is submitted for approval by the GaDOE. If any revisions are requested the Director of Consolidated Funds will assist the Finance Department to ensure the district has an approved RAMP.

The Tattnall County RAMP was created using the Powerpoint "The Answer To Title I Supplement Not Supplant Resource Methodology/Plan" presented August 29-30, 2017 and the Resource Allocation Methodology Plan (Ramp) Ramp Review checklist from November 2017.

Comparability Compliance

It is the responsibility of the Director of Consolidated Funds and the appropriate Federal program director to ensure that TCSS remains in compliance with the Title I comparability requirements. The appropriate federal program director will oversee the process to ensure all procedures are followed and all deadlines are met..

Process to Determine Comparability

Comparability is done in the portal application online by pulling data from fall CPI and FTE reports.

- Login to the GADOE Portal
- Select Title I Comparability
- Select LEA Comparability Reporting
- Complete all require LEA contact information
- Select that system has only one school of each grade span
- Select Submit

Compliance Timeline to Ensure Comparability is Met

January-April (of previous school year)

Should the district have schools of overlapping grade spans, the system would engage in districtlevel budget (state & local funds) discussions concerning staff assignments, and distribution of equipment and materials for the purpose of ensuring comparability.

Ethics and Fraud, Waste, Abuse, and Corruption

All employees sign off on the personnel handbook and policies (ethics and fraud, waste, abuse, and corruption policies as it relates to Title programs, including Title I, Part A Disadvantaged Children, Title I, Part C Migrant Education Program, Title I, Part D Neglected and Delinquent, Title II, Part A Teacher and Leader Quality, Title III and English to Speakers of Other Languages ESOL, IDEA, and Title X, Part C McKinney-Vento Education for Homeless) at the beginning of each school year via Safe Schools Platform. School principals or designee verify that all school personnel have signed off and completed all requirements.

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

- Misusing public or school-related funds;
- Failing to account for funds collected from students or parents;
- Submitting fraudulent requests or documentation for reimbursement of expenses or for pay (including fraudulent or purchased degrees, documents, or coursework);
- Co-mingling public or school-related funds with personal funds or checking accounts; and
- Using school property without the approval of the local board of education/governing board or authorized designee.

The Tattnall County School System takes the responsibility of properly managing federal funds seriously. Any individual who suspects that funds have been misused with any Title program, including Title I, Part A (Disadvantaged Children), Title I, Part C (Migrant Education Program), Title I, Part D (Neglected and Delinquent), Title II, Part A (Teacher and Leader Quality), Title III and English to Speakers of Other Languages (ESOL), IDEA, and Title X, Part C (McKinney-Vento Education for Homeless) should report the waste, fraud, abuse, or corruption using the following guidelines:

Tattnall County School System Policy DIE

The Tattnall County School District ("District") shall not tolerate fraud of any kind and has an established system for the reporting of suspicious activities.

Definitions

"Fraud" is defined as a false representation of a matter of fact, whether by words or by conduct, or by concealment of that which should have been disclosed, that is used for the purpose of misappropriating property and/or monetary funds from federal, state, or local grants and funds.

Responsibilities

Employees and parties maintaining a business relationship with the District who suspect fraud, whether it pertains to federal, state, or local programs, should report their concerns to the Superintendent or his/her designee. If fraud is suspected by the Superintendent, such allegations should be reported to the Chair of the Board of Education.

All reports of suspected fraud shall be handled under the strictest confidentiality allowed under the law. Informants may remain anonymous as allowed by law but are encouraged to cooperate with investigators and to provide as much detail and evidence of the alleged fraudulent act as possible.

Any and all reports of suspicious activity and/or suspected fraud will be investigated. Results of an investigation shall not be disclosed to or discussed with anyone other than those individuals with a legitimate need to know until the results become subject to public disclosure in accordance with state and/or federal law.

Complaint Procedures

Any complaints issued as a result of federal programming, including Title I, Part A (Disadvantaged Children), Title I, Part C (Migrant Education Program), Title II, Part A (Supporting Effective Instruction), Title III and English to Speakers of Other Languages (ESOL), IDEA, and Title X, Part C (McKinney-Vento Education for Homeless) must be filed according to the system complaint procedures policy found on the district's website (<u>https://www.tattnallschools.org/federal_programs</u>) or at the Tattnall County School System Central Office. The school system will ensure that complaints are resolved in a timely manner.

Federal Complaint Procedures under the Elementary and Secondary Education Act of 1965 (ESEA), as amended by the Every Student Succeeds Act (ESSA)

A. Grounds for a Complaint

Any individual, organization, or agency (complainant) may file a complaint with the Local Educational Agency (LEA) if that individual, organization, or agency believes and alleges that the LEA is violating a Federal statute or regulation that applies to a program under ESSA. The complaint must allege a violation that occurred not more than one 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. Federal Programs for Which Complaints Can Be Filed

- 1. Title I, Part A: Improving Basic Programs Operated by LEA
- 2. Title I, Part A: Family-School Partnership Program
- 3. Title I, Part C: Education of Migratory Children
- 4. Title I, Part D: Prevention and Intervention Programs for Children and Youth Who Are Neglected, Delinquent, or At-Risk
- 5. Title II, Part A: Supporting Effective Instruction
- 6. Title III, Part A: Language Instruction for English Learners and Immigrant Students
- 7. Title IV, Part A: Student Support and Academic Enrichment (SSAE)
- 8. Title IV, Part B: 21st Century Community Learning Centers
- 9. Title V, Part B: Rural Education Initiative
- 10. Title IX, Part A: McKinney-Vento Education for Homeless Children and Youth
- 11. Title I, Part A, Section 1003(a) and 1003 (g): School Improvement Grant Program
- 12. IDEA Individuals with Disabilities Act
- 13. School Food Nutrition Programs

C. Complaints at the Local Level

By accepting Federal funds, the LEA agrees to accept and resolve complaints alleging violations of the law in the administration of covered programs. A complaint should not be filed with the GADOE until every effort has been made to resolve the issue locally. If a complainant has tried to file a complaint with the LEA to no avail, the complainant must provide the GADOE with written proof of their attempt to resolve the issue at the local level.

Complaints from private schools, Tattnall County School System employees, parents, and community stakeholders must be filed in writing to the site-based administrator or his/her designee.

In the event the complaint cannot be resolved at the site level, a formal complaint must be filed in writing to the Tattnall County School Superintendent or his/her designee.

D. Filing a Complaint

A complaint must be made in writing and signed by the complainant. The complaint must include the following:

- 1. A statement that the Tattnall County School System has violated a requirement of a Federal statute or regulation that applies to an applicable program;
- 2. The date on which the violation occurred;
- 3. The facts on which the statement is based and the specific requirement allegedly violated (include citation to the Federal statute or regulation);
- 4. A list of names and telephone numbers of individuals who can provide additional information;
- 5. Whether a complaint has been filed with a school, and if so, with which school;
- 6. Copies of all applicable documents supporting the complainant's position; and
- 7. The address of the complainant.

E. 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 Superintendent or designee received the complaint;
- 2. How the complainant may provide additional information;
- 3. A statement of the ways in which the Superintendent or designee may investigate or address the complaint; and
- 4. Any other pertinent information.

If additional information or an investigation is necessary, the Superintendent or designee 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. The 60-day timelines outlined above may be extended, if exceptional circumstances exist. The Letter of Findings will be sent directly to the complainant.

F. 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, Georgia 30334

Stakeholders are made aware of the Federal Programs Complaint Procedures and form through the district website and Tattnall County School Student Handbook. Paper copies are available at each school and the district office.

Tattnall County School System

Complaint Form

Please Print

Name (Complainant):

Mailing Address:

Email Address:

Phone Number (home): Phone Number (work): Phone Number (cell):

School/Person/department complaint is being filed against:

Statement that the Tattnall 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):

The facts on which the statement is based and the specific requirement allegedly 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:	
Tattnall County School Superintendent	
Tattnall County School District	
PO Box 157	
146 W. Brazell Street	
Reidsville, Georgia 30453	
Date Received:	
Date of Response to Claimant:	

Assessment Security

The Tattnall County School System takes the ethical responsibility to provide secure and appropriate testing environments for its students very seriously. In any state or federally mandated test the Tattnall County School system expects its employees to act in accordance with specific guidelines mandated by the test and the general guidelines of the Georgia Department of Education. For every administration of a high stakes assessment the following guidelines will be followed:

- The district test coordinator will stay current on appropriate testing rules and practice by viewing required DOE webinars and reading all manuals and memorandums associated with the test.
- All school test coordinators, BOE administrators, and school administrators will be appropriately trained by the system coordinator prior to the assessment window opening.
- School test coordinators will in turn provide mirrored training to all test examiners and proctors who will be taking part in the test.
- Records of participation and sign-in sheets of each of these meetings will be maintained in a centralized location for a minimum of five years.

- Training at every level will include a segment covering testing ethics and ethical behavior in testing environments.
- Test materials, when on site, will be continuously maintained in a secured and locked room with access limited to only those who are functioning as school test coordinators or assistant test coordinators.
- School campuses will be quiet and organized on the day(s) of testing.
- Any irregularity or anomalous event taking place in a school during testing will be promptly and fully reported to the district test coordinator.
- Irregularities involving possibly illegal or unethical actions on the part of an employee will be reported to the Georgia Professional Standards Commission.
- If the anomaly rises to the level of an irregularity it will be promptly reported to the Georgia Department of Education.
- When test results are returned they will be disseminated to students and parents in a reasonable time frame.
- Assessment results will be communicated to the public via press releases, sections of the website, and other means as necessary.

Consequences for Violations Related to Assessment Security

Any employee who suspects a breach in assessment security must immediately report the breach to their immediate supervisor. Failure to report suspected breaches in assessment security can have negative implications upon an employee. In addition, any investigation that results in a determination of guilt related to violations of assessment security can result in loss of employment and a report filed with the Georgia Professional Standards Commission, which may result in loss of a teacher's certificate.

LEA Test/Security Plan and consequences for violation are included on the Safe Schools Platform that all system employees sign off on at the beginning of the year. The principal or designee ensures that all school staff have signed off at the school level. The Superintendent or designee ensure that all district staff have signed off. The Federal Programs Director maintains a list of employees who have signed off.

Section 5: Title I Allocation Procedures

Procedures for Determining Allocations

After receiving notification of the Title I, Part A grant amounts from GaDOE, reservations in each budget are set aside for required components such as parent and family engagement, parent and family engagement carryover, professional learning, neglected and delinquent, private school per pupil & equitable services, and homeless students. Administrative costs are also part of the reservations, which are not part of the schools' per pupil amounts.

Eligible Attendance Area Worksheet

The Eligible Attendance Area Worksheet includes all schools in the district and residential treatment centers if applicable. Attendance area determinations are calculated using the previous year's October FTE count and school nutrition report (CEP Title I Data Sheet). These numbers are placed in the attendance area determination worksheet provided by the GaDOE and are then ranked from highest to lowest percentage of free/reduced lunches. Pre-K counts are not included in the document. Any of the Tattnall County schools that are over 75% poverty are ranked and earn the highest per pupil allocations. The remaining Title I Schools are served in rank order. The per pupil allocation is always large enough to provide a reasonable assurance that each school can operate its Title I program of sufficient quality. These amounts then become the Title I allocation in consolidation (Fund 150).

The School Allocation Worksheet reflects the Eligible Attendance Worksheet numbers and N&D programs if applicable.

Procedures for Determining Carryover

The Director of Consolidated Funds tracks the spending of each program/school through the year via budget sheets. At the end of the school year, carryover information is updated and reviewed based on the percentages charged back to Title I based on the consolidated budget. 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 all the schools on an equal basis, giving each school an opportunity to spend the funds. Either way, schools must submit a written description of the expenditure requests. Monthly budget sheets are monitored regularly throughout the year and calculations are made from these near the end of the school year to determine that no more than 15% will be carried into the following year

Reservation of Funds

Parent & Family Engagement: A minimum of 90% of 1% of Title I allocation is given to schools. Principals have the option of expending the funds or submitting them back to the system level. Should a principal decide to direct those funds to a district level parent engagement activity/project, he/she must sign a Districtwide Parent Activity Assurance form

unless P&FE funds are being consolidated at the school level. If a school elects to keep the funds at their school they must obtain parent input on how to spend the funds. Documentation must be kept and submitted with all parent engagement set aside requisitions.

Private Schools: The Tattnall County School System currently has no private schools that have chosen to participate in the federal programs. If Tattnall County School System ever has any private schools that choose to participate, all Federal regulations for private school participation will be followed. The private school worksheet would be completed and attached to the Consolidated Application to ensure that all reservations related to parental involvement, instructional lead teachers, professional learning, and paraprofessionals have been reserved.

Homeless Children and Youth: Title I schools are required to set aside funds within their budget to meet the needs of homeless children and youth. The Tattnall County School District conducts an annual survey to determine the number and location of homeless children and youth residing within the jurisdiction of the LEA. The Tattnall County School District uses state and local funds in conjunction with Title I, Part A funds to provide assistance to homeless students. In addition, the Tattnall County School System sets aside funding in its Title I funds to satisfy unmet needs of homeless populations in all schools. The Homeless liaison consults and trains school personnel how to identify children in homeless situations. The Homeless liaison is consulted if a student is found to need transportation to a school of origin and arrangements are made through the transportation department. Needs assessments are conducted by the homeless liaison when a child is identified as homeless. The Tattnall County School System identifies homeless students' needs and funds accordingly (method 1).

Neglected and Delinquent Children: The reservation amount provided by the GaDOE in the Title I, Part A allocation letter and worksheet is the amount set aside for neglected and delinquent children. Currently, there are no N&D facilities in Tattnall County. The Annual Survey of Local Institutions for Neglected and Delinquent Children is completed each year and is based on the children residing at the home for 30 consecutive days with at least one being in October. The district uses the information provided by the GaDOE to determine reservations for parental involvement, Private Schools, Indirect cost, and Neglected and Delinquent.

Parent and Family Engagement Carryover: This is calculated after the completion report is completed in September of each year. The Finance Director prepares a printout of all 2100 set aside funds budgeted and not spent for the prior year. These are the funds that are held at the BOE as a set-aside in the Title I Budget. This amount is attached to the Title I Budget on the general attachment tab on the Con App. These funds are added to each school's budget as the carryover funds are added to the Con App.

Section 6: Notice to Parents

School Designation Status

Due to the implementation of the new federal law, the Every Student Succeeds Act (ESSA), the designations of Priority Schools and Focus Schools as well as the Flexible Learning Programs (FLP) are no longer required after the 2016-2017 school year; therefore, parent notifications with a FLP description of services and eligibility are not applicable in 2017-2018. Beginning in the 2018-2019 school year, the Georgia Department of Education will use a new method to identify schools that need additional support and improvement. As required by ESSA, the new designations will be Comprehensive Support and Improvement (CSI) schools and Targeted Support and Improvement (TSI) schools.

Professional Qualifications

All schools will provide notification to all parents regarding their right to request teacher and paraprofessional qualifications. The notification will be provided through the student handbook, placed on the district and school websites, and shared at Annual Title I Meetings.

To be considered professionally qualified, the district requires a minimum of a bachelor's degree, with the exception of special education fields, a related degree, and/or a demonstrated level of content knowledge needed to effectively teach the content assigned. Applicants can demonstrate content knowledge through coursework, on the job experience, or GACE testing. Applicants not meeting professionally qualified requirements are issued professional learning plans to guide obtaining the needed requirements. Applicants not meeting certification requirements are issued professional learning plans to guide obtaining clear, in-field certification. Plans are reviewed twice annually and applicants are required to make adequate progress to be considered for contract renewal. Although the district is a Strategic Waiver Schools System waiving certification, the district's goal is for all staff members to hold GaPSC teaching credentials.

Notification to Parents of English Learners

Previously stated in both Title I and Title III under the Elementary and Secondary Education Act (ESEA), the overarching parent and family engagement law regarding notices to parents of English Learners (ELs) is now under Title I, Part A, Section 1112(e)(3) in the Every Student Succeeds Act (ESSA).

The Tattnall County System will disseminate a Title- I compliant letter that notifies parents if their EL student is being offered federally-funded supplemental language services. Upon identification of a student as an English learner, a letter must be sent to notify parents of their child's qualifications for Title III services. This letter, among other things, offers the parent the choice to allow or refuse the title-funded service. Notice will be provided to parents of English Learners no later than 30 days after the beginning of the school year who are placed in a supplemental language program funded by Title I, Part A or Title III. As documentation of

Notification to Parents, signed and dated district documentation of the notification (Appendix C) will be kept in the student's ESOL Student Folder. Staff will retain a statement indicating the language(s) and date(s) the notification was distributed. For those children who have not been identified as ELs during the school year, the school district will notify the children's parents during the first 2 weeks of the student being placed in the supplemental language program.

Communication in an Understandable Format

When parents mark on the online enrollment form that they need correspondence in another language, to the extent practical, efforts are made to provide either written support or support through an interpreter. District and school staff who are fluent in multiple languages support these efforts. Furthermore, all parent communication is written in a format so that the content is easily understandable.

Section 7: Parent and Family Engagement

Parental and Family Engagement Policy Overview

The Tattnall County School System has an on-going commitment to Title I parents. Parental involvement is defined as the participation of parents in regular, two-way, and meaningful communication involving student academic learning and other school activities. Our goal is to ensure that Title I parents and their children receive extraordinary services and assistance that will lead to improved academic achievement. The district recognizes that parents are an integral part of a child's success in school, starting with the concept of being the child's first teacher. As a conduit for their children's success, the district will assist parents of all socioeconomic levels in solidifying their ongoing commitment to their child's success.

LEA Technical Assistance to Schools on Parent and Family Engagement Requirements and Best Practices.

The LEA provides technical assistance to schools in the following ways:

- Professional learning sessions during administrative and curriculum meetings.
- Professional learning sessions conducted during a faculty meeting once per school year at each school.
- One on one meetings held at each school site between the Title I Director and/or Family Engagement Specialists and school leaders.
- The creation and sharing of a Federal Programs Handbook.
- Technical assistance with planning, organizing, and conducting parent meetings.
- Ongoing emails and phone calls.

Parent and Family Engagement Policies/Plans

Title I, Section 1116(a)(2)(A)-(F) of the 2015 reauthorization of Elementary and Secondary Education Act (ESEA) to Every Student Succeeds Act (ESSA) requires that each school receiving Title I, Part A funds develop jointly with, agree on with, and distribute to parents and family members of participating children a written parent and family engagement policy. All children in Tattnall County Schools System participate in Title I programs.

Tattnall County School System is committed to cultivating and sustaining partnerships with parents and community stakeholders, and encourages their participation in the development, implementation, review and evaluation of its parent and family engagement policy/plan. This written policy/plan focuses on improving academic achievement and school performance and outlines how the LEA will coordinate, provide technical assistance and other support to schools in planning and implementing effective parent and family engagement activities, trainings, and workshops

The LEA, school, parents, and community stakeholders will jointly develop and agree on the Parent and Family Engagement Policy/Plan, which will describe the means for carrying out Title

I, Part A requirements. The policy/plan will be made available to the local community and parents of students enrolled in the Tattnall County School System using multiple means. The policy/plan will be available on the Federal Programs page of the district's website <u>https://www.tattnallschools.org/federal_programs</u>, in the parent/student handbook, on individual schools' websites, in hard copy format in the main office of each school, and in various community locations.

Parental Input on District and School Parent and Family Engagement Plans

District and school parent and family engagement plans are reviewed and revised annually with parents and other stakeholders (teachers, principals, administrators, and other school personnel). Schools will hold individual meetings for review of the district and school Parent and Family Engagement Plans. All Title I parents, teachers, administrators, and other school personnel in the district are invited to the meetings to provide input. Notices will be placed using multiple means such as the local newspapers, school websites, school FB pages, Class Dojo, School Messenger, Remind, newsletters, or flyers containing the meeting dates. Parents and other stakeholders will be notified by invitation sent by each individual school. Parents who cannot attend the meetings will be given the opportunity to obtain a copy from the main office of each school and submit input before final revisions are approved. The Title I Director and Family Engagement Specialist will be responsible for collecting the required information (agendas, meeting notes, and sign in sheets). Meetings will be held in the Spring to revise plans for the next school year. The LEA Parent and Family Engagement Policy checklist will be applied to district and school plans. Revision dates will be clearly marked on each plan. The Family Engagement Specialist and/or the Title I Director will review plans before or during on-site monitoring visits. Plans include activities/workshops that have been identified and requested through the previous year's annual parent and family engagment survey. School improvement and parent and family engagement plans are posted on the website, available in the front office of the school, and hard copies are either in the student handbook or beginning of school packets at each school.

Each school in the Tattnall County School System holds an annual open house or parent orientation. These meetings give parents the opportunity to review and provide feedback on system-wide and school student data, parent and family engagement activities, district and school Parent and Family Engagement Plans, Schoolwide Title I Plans, and School Improvement Plans. Parents are notified about this opportunity through advertisements in local media, school-level flyers, social media websites and by using the system automated phone calling system and the system website. The school district uses the comments provided by parents during the annual review/revision of documents at parent workshops and other advisory meetings. After the school system review/revision process, district and school Parent and Family Engagement Plans are made available to parents on the district website and on Title I schools' websites. Parents are also given the opportunity to provide feedback about Title I programs by completing annual parent and family surveys. These comments are used by the district and Title I schools when planning parenting programs.

Distribution of Completed Plans

Several plans are shared with faculty, staff, students, parents and community members on the school district Federal Programs web site located at: <u>www.tattnallschools.org</u>.

Plans include district and school improvement plans, parent and family engagement policies, Title I schoolwide plans, school compacts, flexible learning program plans, comprehensive LEA improvement plan, parents' right to know, complaint procedures, and policy on ethics and fraud, waste and abuse. Many of these plans are included in student agendas and student handbook. An automated calling system and information in first day packets inform parents about the availability of these plans. Parental input into the content of each plan is solicited during multiple meetings throughout the school year but especially at Title I planning meetings conducted each Spring.

School/Parent Compacts

The Tattnall County School System will share responsibilities for high student academic achievement with all parents and students enrolled in the school system and will develop, in collaboration with parents and students, a school-parent compact that outlines how parents, school staff, and students will share the responsibility for improved student academic achievement. The school-parent-student compact will also describe the means by which the school, parents, and students will build and develop a partnership to ensure student mastery of the GaDOE's high academic content standards. The Federal Programs Director and Family Engagement Coordinator will train all Title I school staff on reviewing school-parent compacts for use including one or two specific academic achievement goals at the school and/or grade level and concrete activities/strategies the school will share with teacher to build and develop partnership to help children achieve the defined goal.

Parental Input on School Compacts

All Title I schools are required to have school-parent compacts. It is the responsibility of the Principal, in coordination with the school system Federal Programs Director, to make sure that all compacts are reviewed and revised annually. The review and revision will occur in the Spring of the year at annual Title I Parent Planning Meetings, school governance meetings, and parent workshops. Revision dates will be clearly marked on each compact. An invitation will be sent home to all parents in the school and meeting dates will be publicized in school newsletters, local newspapers, school social media, and/or on each school's website. The Family Engagement Specialist will be responsible for collecting required information (agenda, meeting notes, and sign in sheets). Parent compacts will include responsibilities for the teachers, parents, and students as it relates to academic achievement. Compacts will be distributed to all parties involved for signatures each fall. Copies of the signed parent compacts are kept on at the school level. The Tattnall County Schools Board of Education believes that student educational goals should reflect the goals of the community. We affirm and assure the rights of parents to participate in the development of the goals and objectives of the public schools and encourage involvement in all areas of their children's educational experiences.

Annual Title I Meeting

All Title I schools are required to hold an annual meeting at the beginning of the school year. Tattnall County Schools have their annual Title I meeting by October 31. It is the responsibility of principals in coordination with the Family Engagement Coordinator to arrange meeting times and invite all stakeholders to the meetings. The Family Engagement Coordinator will be responsible for providing guidance and maintaining copies of received documentation of the required Title I Annual Parent Meeting, including copies of sign in sheets, agendas, PowerPoints, handouts, and minutes to the Title I Director. Meetings are publicized a minimum of two ways via flyers sent to parents, websites, social media, newspaper articles, an automated call system, and/or marquees at each school.

Annual Evaluation of Parent and Family Engagement

Process to Collect: An annual survey is conducted each Spring. The survey is conducted online. However, parents are informed of the availability of a paper survey if they so desire. Advertisement of the survey and requests for completion occur through local newspapers, newsletters, district and school websites, and automated phone calls. The survey is collected and compiled and the following year's parent involvement activities are built from the responses.

Process to Review: The results of the survey are shared among several groups of stakeholders, including, but not limited to, parents, school and central office employees, community members and those attending Annual Title I Meetings. The results of the survey are used to review and revise schoolwide and parent and family engagement plans and components.

Actions Taken by LEA to Improve the Quality and Effectiveness of Parent and Family Engagement Policies and Practices: Director of Consolidated Funds, Principals, Academic Coaches, and the Parent and Family Engagement Coordinator review the annual spring survey results, as well as all feedback received during the annual needs assessment process. Additions/deletions/revisions are discussed and agreed upon during this meeting. Formatting and revisions are made after the meeting and then provided to stakeholders for review and suggestions.

Parent and family engagement workshops and activities are planned for the following year based on information gained during the annual needs assessment process. Materials are also purchased for parent resource centers based on expressed needs. Many opportunities are provided for building strong parent capacity. The purpose is to ensure effective parental involvement and to support a partnership among schools, parents, and the community to improve student academic achievement, through the following activities: Annual meetings; Conferences; E-mail communications; Phone calls; Parent workshops and activities; Family nights; Volunteering; Parent advisory meetings; Open Houses; Annual notification of school designation; Newsletters/flyers/brochures; Website information; School Governance meetings; and Board of Education meetings.

Capacity for Parent Engagement

Information is provided to school personnel and parents on how to build parent capacity through presentations made during meetings, through response to parent needs on surveys, through information received from the GADOE Parent Engagement department, and through student handbooks, newsletters, and flyers.

The Federal Programs Director and Family Engagement Coordinator considers and plans based on the six requirements/*shalls* for building capacity for parent engagement:

(1) <u>SHALL</u> provide assistance to parents of children served by the school or local educational agency, as appropriate, in understanding such topics as the challenging State academic standards, state and local academic assessments, the requirements of this part, and how to monitor a child's progress and work with educators to improve the achievement of their children;

(2) <u>SHALL</u> provide materials and training to help parents to work with their children to improve their children's achievement, such as literacy training and using technology (including education about the harms of copyright piracy), as appropriate, to foster parental involvement;

(3) <u>SHALL</u> educate teachers, specialized instructional support personnel, principals, and other school leaders, and other staff, with the assistance of parents, in the value and utility of contributions of parents, and in how to reach out to, communicate with, and work with parents as equal partners, implement and coordinate parent programs, and build ties between parents and the school;

(4) <u>SHALL</u>, to the extent feasible and appropriate, coordinate and integrate parent involvement programs and activities with other Federal, State, and local programs, including public preschool programs, and conduct other activities, such as parent resource centers, that encourage and support parents in more fully participating in the education of their children;

(5) <u>SHALL</u> ensure that information related to school and parent programs, meetings, and other activities is sent to the parents of participating children in a format and, to the extent practicable, in a language the parents can understand;

(14) <u>SHALL</u> provide such other reasonable support for parental involvement activities under this section as parents may request.

Capacity for Staff Involvement

Information is provided to school personnel on how to build staff capacity in working with parents as equal partners through presentations made during meetings, through response to parent needs on surveys, through information received from the GADOE Parent Engagement department, and through student handbooks, newsletters, and flyers. The Federal Programs Director, Academic Coaches, and/or Family Engagement Coordinator will educate teachers and other staff on 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. The Family Engagement Coordinator will provide guidance on two capacity building opportunities either in-person or online per semester with a detailed agenda focused on topics related to contributions of parents as equal

partners. The Academic Coach at each school will conduct the training for schools and provide proof via sign in sheets to the Federal Programs Director and the Family Engagement Coordinator.

Required 1% Set Aside for Parent and Family Engagement

Parent and Family Engagement: Principals have the option of expending the 1% in Parent and Family Engagement funds or submitting them back to the system level. Principals, with input from parents, typically decide to keep the funds at the school level. If they choose to direct those funds to a system level parent and family engagement activity/project, they will sign a District-wide Parent Activity Assurance form. The funds are used at the school/system level for expenses related to communication of Title I information to parents. Title I parents are informed about the 1% set aside during the Fall Annual Title I Parent Meeting and participate in the discussion regarding this requirement each Spring during Title I planning meetings held at each school.

School Improvement Plans

School Improvement Plans are created each spring for the following school year. Each school leadership team meets during the spring. The team is composed of representatives from each grade level, content area, and department, as well as administration and parents. The stakeholders meet to develop a plan. School administrators then present the plan at the annual system leadership summit as they work with other schools, system leaders, and parents to develop a system improvement plan. Once the plan is approved by system leaders, it is presented to and approved by each School Governance Team. It is through this process that the LEA oversees the development of school improvement plans. System leaders also support schools in developing, revising, implementing and coordinating school improvement and schoolwide plans during quarterly administrative meetings. During the meetings, data is analyzed to identify and develop solutions to challenges related to instructional strategies, parent and family engagement, professional learning, and budgets. Additionally, system leaders conduct "Checks" to evaluate the extent to which improvement plan goals are being met. Parents are sent information inviting them to participate in the revision process at annual Title I Planning meetings held at each school during the Spring. Once revisions are made, the plan is placed on each school's web site. Hard copies are also available in the main office at each school.

LEA Technical Assistance to Schools

The Director of Consolidated Funds and other program directors maintain a file of all trainings conducted throughout the year. This file contains all staff trainings, handouts, meeting agendas, checklists, meeting notes, sign in sheets, phone logs, etc. The Director of Consolidated Funds and/or the Parent Engagement Coordinator presents at both district and school leadership meetings on the following:

- School-Parent Compacts
- Parent & Family Engagement Plans
- CNA/School Improvement Plans
- Annual Title I Meetings
- Title I Budgets and Guidelines

- How to Communicate with Parents
- Effectiveness of Programs/Strategies
 Professional Qualifications
 Required Parent Notifications

Section 8: School Improvement 1003(a)

Monitoring of School Improvement

RES was the only school in Tattnall County that has been identified as a 1003(a) school. Due to the closure of RES and rezoning of students, NTES will not be identified as a 1003(a) school for FY23.

All Title I schools within the Tattnall County School System implement Schoolwide Programs. This provides all children and all parents of Title I schools an opportunity to have equal access to all related Title I assistance. The LEA will utilize the district curriculum specialists with the GaDOE to establish clear expectations for personnel as they systematically support continuous improvement in all schools.

Review and Approval of School Improvement and Schoolwide Plans

School Improvement and Schoolwide Plans are finalized each summer for the following school year. Each school leadership team conducts meetings, which include representatives from each grade level, content area, and/or department to review and revise the plan. During school level PLCs, instructional strategies, parental and family engagement initiatives, and professional development activities are planned after a careful analysis of various data. Assistance is also provided to schools in their use of school improvement funds to accomplish initiatives in their school improvement and schoolwide plans. School administrators discuss their school plans at the district leadership PLC. It is through this process that the LEA oversees the development of school improvement plans. All Tattnall County Schools use the GaDOE schoolwide/school improvement plan template.

Monitoring of Use of Funds

The Director of Consolidated Funds reviews each purchase request prior to purchasing. Budget reports are also reviewed with principals to review intent and purpose of each program.

Section 9: School Improvement 1003(g) SIG

The Tattnall County School System does not have any schools designated to receive 1003(g) funds. In the event of a school having this designation, the LEA will follow the procedures as outlined by the GaDOE.

Section 10: Services for Homeless Children and Youth

The Tattnall County School System District Homeless Liaison, Dr. Tisha Holland, provides all school staff at a minimum, yearly with requirements of the McKinney-Vento Homeless Education Act. Among the topics discussed are the transportation requirement for schools of origin and the definition of and services for students identified as homeless. The Homeless Liaison works closely with school administrators, guidance counselors and the transportation departments to ensure students receive the services they need. Posters are placed throughout the schools and in local businesses where parents and students can readily see the services provided. A meeting is held annually to review and revise if needed Policy JBC (1).

Tattnall County School System Policy JBC(1) Implementation of the McKinney-Vento Act

In accordance with the Education For Homeless Children and Youths: Subtitle B of Title VII of the McKinney-Vento Homeless Assistance Act (42 U.S.C. 11431 et seq.), the Tattnall County Board of Education adheres to the guiding principle that all eligible children and youth who reside within the Tattnall County School District are entitled to a free, appropriate public education. The Superintendent shall designate an appropriate staff person to be the Tattnall County School System's liaison for homeless students and their families. Students identified as "homeless" or "in transition" will be given a full opportunity to meet state and local academic achievement standards and will be included in state- and district-wide assessments and accountability systems. The Tattnall County school district will ensure that children and youth in transition are free from discrimination, segregation, and harassment. Any information regarding each student's homeless status shall be handled in a confidential and professional manner by school and system personnel.

Definitions:

- (1) In accordance with the Act and State Board Rule 160-5-1-.28 (JBC), the term "Homeless Child and Youth" is defined as individuals who lack a fixed, regular, and adequate nighttime residence, including children and youth who are:
 - a. Sharing the housing of other persons due to loss of housing, economic hardship, or similar reasons;
 - b. Living in motels, hotels, trailer parks, or camping grounds due to lack of alternative adequate accommodations
 - c. Living in emergency or transitional shelters;
 - d. Abandoned in hospitals;
 - e. Living in cars, parks, public spaces, abandoned buildings, substandard housing, or bus or train stations, or similar settings;
 - f. Sleeping in primary nighttime residence that is a public or private place not designed for, or ordinarily used as, regular sleeping accommodations
 - g. Migratory, or living in the circumstances described above.

A child or youth shall be considered to be experiencing homelessness for Tattnall if he or she is in a living situation described above.

(2) Unaccompanied youth - a youth not in the physical custody of a parent or guardian, who is in transition as defined above.

(3) School of origin - the school the child or youth attended when permanently housed or the school in which the child or youth was last enrolled.

Identification:

In collaboration with school personnel and community organizations, the district homeless liaison will identify children and youth experiencing homelessness within our school district. The liaison will train school personnel (including bus drivers) on possible indicators of homelessness, sensitivity in identifying families and youth as experiencing homelessness, and procedures for forwarding information concerning homelessness to the district homeless liaison. School registrars and secretaries will inquire about possible homelessness upon the enrollment and withdrawal of students and forward information indicating homelessness to the liaison.

School Selection:

Each child and youth experiencing homelessness has the right to remain at his or her school of origin, or to attend any school that students living in the same attendance area are eligible to attend whichever is in the student's best interest as determined by the school district. A student may remain at his/her school of origin the entire time of "homelessness" and until the end of the academic year in which he/she becomes permanently housed.

Enrollment:

Tattnall County School System personnel shall request proof of residency of all students enrolling in the Tattnall County School System. If a student is identified as homeless by definition, the school will enroll the student immediately. Homeless students may be enrolled by a parent or the district's liaison. Enrollment may not be denied or delayed due to lack of any document normally required for enrollment including, but not limited to, the following:

- Proof of residency
- Transcripts/school records
- Immunization or immunization/health/medical/physical records
- 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

The school counselor and registrar at each school will assist the homeless/unaccompanied youth in obtaining past transcripts and ensuring that credit had been awarded. In the event that partial credit was awarded, the school principal will be notified and the principal, registrar, and counselor will look at local and state requirements for coursework to determine the best route to get the student back on track or caught up with credits. This team will meet with the parents and student, if possible, to update them on the student's academic progress.

If one of the students coded as homeless in our student information system withdraws, the registrar or counselor at each school will contact the receiving school via email or phone to make sure that the enrollment process is expedited and that all records are sent in a timely manner.

Services:

The Tattnall County School System's liaison for homeless students shall coordinate with any/all local social service agencies that provide services to homeless children and youths and their families; other local school systems on the transfer of student records; and state and local housing agencies responsible for comprehensive housing affordability strategies.

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

- Transportation Homeless students are entitled to transportation to his/her school of origin or the school where he/she is to be enrolled.
- Title I
- Educational services for which the student meeting eligibility criteria, including special education and related services and programs for English language learners
- Vocational and technical education programs
- Gifted and talented programs
- School nutrition programs
- Before-school and after-school programs when applicable
- Automatic eligible for free meals

The Tattnall County School District Title I plan will be coordinated with our McKinney-Vento services, through collaboration between the Title I Director and the liaison. Children and youth experiencing homelessness will be assessed, reported on, and included in accountability systems, as required by law and U.S. Department of Education regulations and guidance.

An informal needs assessment will occur upon becoming McKinney-Vento eligible in collaboration with the Homeless Liaison through completion of the system's intake form. Additional needs at a later date will be addressed promptly.

Disputes:

If a dispute arises over any issue covered in this policy, the child or youth in transition shall be enrolled immediately to the school in which enrollment is sought pending resolution of the dispute. The student shall also have the same rights to all appropriate educational services, transportation, free meals, and Title I services while the dispute is pending. The parent or guardian shall be informed of the Tattnall County School System's decision and the appeal rights in writing. The System's liaison will carry out dispute resolution as provided by state rule. Unaccompanied youth will also be enrolled pending resolution of the dispute. If the matter is not resolved at the local level, the parent may request to exercise the right for a review of the dispute and decision by the Georgia Department of Education in accordance with Dispute Resolution Guidelines and Procedures included in the Georgia Department of Education's publication "Implementing Title I in Georgia Schools: A Handbook for Title-I Directors", which is available on the Georgia Department of Education's website.

Contact Information:

Tisha Holland Homeless Liaison (912)557-4726 Tattnall County Schools PO Box 157 Reidsville, GA 30453 tholland@tattnall.k12.ga.us

Section 11: Services for Foster Care Children

*See Foster Care Plan attached in Con App

Section 12: Services for Neglected and Delinquent Children (Set-Aside)

Neglected & Delinquent Facilities

Neglected and Delinquent facilities are identified via the GaDOE's website. There are no N&D facilities in Tattnall County.

Funding, calculated from the Annual Neglected and Delinquent Survey, provides the GaDOE with current information on the location and number of children living in the institution for neglected children. The information is used to compute the Title I N &D allocations for school districts so that eligible children in the institutions can be provided Title I funded educational services. The survey must include children and youth who are 5-17 years of age and live in the institution for at least one day during a 30 consecutive day counting period, with at least one day of the counting period being in October.

Section 13: Title IV, Part A – Student Support and Academic Achievement

Tattnall County transfers 100% of Title IV, Part A to Title I, Part A.

Authorized in December 2015, the 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 students' academic achievement by increasing the capacity of States, LEAs, schools and local communities to:

- Provide all students with access to a well-rounded education,
- Improve school conditions for student learning, and
- Improve the use of technology in order to improve the academic achievement and digital literacy of all students.

These funds are to serve all students. So, they are not limited to Title I schools. An LEA may use funds for college and career counseling programs and services under the area of well-rounded educational opportunities. If the LEA's annual grant award is \$30,000 or higher, the grant funds must be utilized to address the three areas of focus, and must be based on the results of a comprehensive needs assessment in the areas that the grant is designed to target. The LEA will have to demonstrate, through its plan and budget, that the three areas are covered in the percentage identified—at least 20% to activities to support well-rounded education opportunities, at least 20% to activities to support safe and healthy students, and a portion for activities to support effective use of technology.

Section 14: Prevention and Intervention Programs for Children Who are Neglected Delinquent, or At-Risk

Not applicable

Section 15: Title II, Part A – Supporting Effective Instruction

Tattnall County transfers 100% of Title II, Part A to Title I, Part A.

Title II, Part A was originally authorized as Eisenhower Professional Development and the Class Size Reduction programs under the Elementary and Secondary Education Act (ESEA) of 1965, was reauthorized in 2001 by the No Child Left Behind Act (NCLB) and in 2015 by the Every Student Succeeds Act (ESSA). While ESSA was authorized in December of 2015, the Consolidated Appropriations Act of 2016 extended the date by which certain parts of the Act would be effective. ESSA is in full effect as of July 1, 2017. Further guidance has been provided by USDE in the form of Dear Colleague Letters and FAQs. In 2012 USDE allowed SEAs to submit Flexibility Waivers; however, per these FAQs all flexibility requests are null and void as of August 1, 2016.

Title II, Part A Supporting Effective Instruction Grant funds are obtained by a State on the basis of the United States Department of Education's (USDE) approval of either (1) an individual State plan or (2) a consolidated application that includes the program. Through the program, state and local educational agencies (SEAs and LEAs) receive funds using a USDE provided formula based on poverty and population.

The purpose of the Title II, Part A grant is

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

Equity Belief Statement

The administration and staff of the Tattnall County School System believe all students should have equitable opportunities to receive quality instruction. It is imperative that students be taught by effective, professionally qualified teachers and have comparable class sizes so that the diverse learning needs are met.

Annual Needs Assessment Process

Since the Tattnall County School District transfers all Title II, Part A funds to Title I, Part A, the District's equity plan focuses on the collaboration of all stakeholders including teachers, staff, administration, and parents/community members during the CNA process. The CNA process begins in January with principals to review personnel and program needs for the upcoming school term. The CLIP serves as the plan detailing coordination of various federal programs,

plans for consolidation (Intent and Purpose) and the identification of needs and in-turn budgeting for such needs with available funds. The CLIP includes the following components: 1) district CNA report; 2) district improvement plan; 3) parent and family engagement policy/plan; 4) foster care transportation plan; 5) Title I, Part C identification and recruitment plan; and 6) the equity plan. Department directors, coordinators, specialists, school and system leaders, as well as community and parent stakeholders are involved in the process.

Parents are sent information inviting them to participate in the CNA process via email, telephone, social media, website, and text. The district conducts an annual survey each year that allows parents to provide input on district policies and procedures. Parent input is examined and considered from these surveys and parent stakeholder meetings. Documentation includes sign-in sheets, agendas, emails, survey responses and returned plans with comments when received. Several opportunities are available to garner input from all stakeholders. For example, input is solicited from district, school, and curriculum leaders at administrative and curriculum PLCs. The Director of Consolidated Funds and program directors gather all input and update the various components of the CLIP. The plan is submitted to the Superintendent for final approval.

Equity Plan

The Tattnall County School District Equity Plan for Title II-A is revised each May/June as part of the CNA process. The Equity Plan serves as the plan detailing professional learning and effective equitable practices among teachers. Department Directors, school and system leaders, as well as, community and parent stakeholders are invited to participate in the CNA process. As the Equity Plan is revised, it is shared with the leadership team as part of the CLIP document. Principals seek input from school level stakeholders and then give feedback for revisions if applicable. Meeting agendas and sign-in sheets will be maintained as evidence and documentation of stakeholder involvement in the CNA process. The system monitors progress and implementation of the equity plan while monitoring the intent and purpose of consolidation as well as during the CNA process.

Effectiveness of Title II, Part A Funded Activities

The Director of Consolidated Funding will discuss and review funded activities to ensure that the intent and purpose of Title II, Part A is met. Annual CNA data and observations will be used for determining effectiveness of professional learning activities.

Prioritization of Needs

Internal and external stakeholders are involved in the planning process by assisting with the prioritizing of needs during the Comprehensive Needs Assessment Process. Prioritization of needs is accomplished by analyzing the data presented and group discussion and collaboration. District level leadership meetings will also be held to assist in planning prioritization of needs.

Authorized Use of Funds

Title II funds can be used for recruitment, retention, professional development, and class size reduction. Title II-A funds must be used to supplement, not supplant non-Federal funds that would otherwise be used for activities authorized under Title II-A. However, the Tattnall County School District transfers all Title II, Part A funds to Title I and Title I funding is consolidated with other state, federal, and local funds. Expenditures of the consolidated funding must be necessary to implement an activity designed to meet one or more of the annual prioritized needs as identified in the school level improvement plan, must reasonable in cost and must meet the intent and purpose of at least one of the federal state and local funding sources which includes the Title II, Part A program.

Professional Learning

Professional Learning must be of high quality, sustained, intensive, and classroom-focused in order to have a positive and lasting impact on instruction and the teacher's performance in the classroom. Professional learning should not just be one day activities or short term workshops and conferences. It is the mission of the Tattnall County School System for professional learning to have a direct and lasting impact on classroom instruction. Professional learning must focus on the district and school priorities in addition to increasing the ability of the teaching staff to help all students achieve high academic standards, or the school administrative staff to lead their schools' efforts to increase student academic achievement. The Curriculum Director reviews all professional learning activities to ensure they are scientifically based or based on evidence of program success if funded directly by a Federal program.

The Tattnall County School District strives to offer ample opportunities for teachers, administrators, and paraprofessionals to attend professional development that enables teachers to become more qualified and successful classroom teachers. Teachers are provided with opportunities to attend professional development during school, after school, and during summer break. All professional learning requests are documented and kept on file through the approval process in Informa. PLC documentation is kept on file at the school level. Principals document PLP/PLG completion for the district by completing the PLP/PLG Certification Requirement Form annually. The form is maintained at the district by the Curriculum Director.

The Tattnall County School District follows the following guidelines for the expenditure of funds for professional learning. Professional learning funds may be expended for one or more of the following:

- Staffing options and compensation to support a professional learning coordinator, curriculum specialists, mentors, and teacher and principal leaders;
- Compensation to teachers, leaders, and instructional specialists for facilitating professional learning outside contracted hours;
- Release time for teachers to serve as mentors/instructional specialists;
- Substitute teacher salaries/benefits for release time for teachers to participate in professional learning;
- Travel for professional learning purposes;

- Professional and technical service fees and expenses for instructors and consultants;
- Instructional equipment, materials and supplies for professional learning purposes;
- Training materials and supplies;
- Stipends;
- Reimbursement for expenditures of persons who successfully complete conferences, workshops or courses approved by the Title II Coordinator and in accordance with the district's policy.

Conferences

The Tattnall County School District will exercise discretion and judgment when authorizing expenditures related to conferences to ensure costs are appropriate, necessary and managed in a manner that minimizes costs to the federal award. When submitting reimbursement requests the Director of each Federal Program and/or the Director of Consolidated Funds will review the agenda to ensure the sessions attended are allowable under the funding program or meet the intent and purpose of the programs represented in the consolidated budget. If they are not, reimbursements will be pro-rated with proper funding codes. Reimbursement expenses for costs associated with meals and hotels will follow the district travel policy.

Advertising and Public Relations Costs

Pursuant to the requirements in 2 CFR §200.421, the costs of advertising are allowable only for the recruitment of grant personnel; the procurement of goods and services for the award; disposal of scrap or surplus materials acquired under the award; and program outreach. Allowable public relations cost are those necessary to communicate with the public and press pertaining to specific activities or accomplishments or as necessary to keep the public informed on matters of public concern. All advertising and public relations costs must be necessary for the performance of the particular award, and must not be for the purpose of advertising or relating to the public with regard to the district in general.

Hosting Meetings and Conferences

2 CFR §200.432 discusses the allowability of conference costs paid by the district as a sponsor or host of the conference. A conference is defined as a meeting, retreat, seminar, symposium, workshop or event whose purpose is the dissemination of technical information beyond the non-Federal entity and is necessary and reasonable for successful performance under the Federal award. These federal guidelines state that costs may include rental of facilities, cost of meals and refreshments, local transportation, and other items incidental to such conferences unless further restricted by the terms and conditions of the Federal award. Per the guidance, conference hosts/sponsors must exercise discretion and judgment in ensuring that conference costs are appropriate, necessary, and managed in a manner that minimizes the costs to the Federal award. However, the USDE issued more restrictive guidance related to the use of funds for conferences and meetings, particularly with regard to food costs such as meals, snacks, and refreshments. Per guidance from the USDE:

"Generally, there is a very high burden of proof to show that paying for food and beverages with Federal funds is necessary to meet the goals and objectives of a Federal grant. When a grantee is hosting a meeting, the grantee should structure the agenda for the meeting so that there is time for participants to purchase their own food, beverages, and snacks. In addition, when planning a meeting, grantees may want to consider a location in which participants have easy access to food and beverages.

While these determinations will be made on a case-by-case basis, and there may be some circumstances where the cost would be permissible, it is likely that those circumstances will be rare. Grantees, therefore, will have to make a compelling case that the unique circumstances they have identified would justify these costs as reasonable and necessary."

Additionally, the USDE guidance states that grantees should consider whether a face-to-face meeting or conference is the most effective or efficient way to achieve the desired result and whether there are alternatives such as webinars or video conferences, that would be equally or similarly effective and more efficient in terms of time and costs than a face-to-face meeting.

District staff will adhere to these guidelines if and when hosting a meeting or conference for nonemployees. Prior to planning a meeting or conference, approval will be obtained from the grant Program Manager. If necessary or required, the proposed meeting or conference will be budgeted in the approved application.

Memberships, subscriptions, and professional activity costs

Tattnall County School System will follow procedures as outlined in UAR 200.454 to ensure compliance with governing laws and regulations. Memberships are paid out of federal funds. If subscriptions are approved to be funded out of federal programs, the subscription period will only be for the period of the grant award. All subscriptions will be included in the SIP and/or district plan and the budget prior to purchasing.

In order for a cost to be allowable, the expenditure must also be allowable under the applicable federal program statue (e.g., Title I of the Elementary and Secondary Education Act [ESEA]) with accompanying program regulations, non-regulatory guidance, and grant award notifications.

Recruitment

If it is necessary to fund recruitment costs from federal funds, Tattnall County School System will follow the guidelines as outlined by EDGAR and the Title II, A handbook. Allowable recruitment costs include:

- ""Help Wanted" advertising allowable by Title II, Part A
- •Travel associated with recruitment
- The procurement of goods and services for Title II, Part A

All expenditures relating to recruitment that will be funded out of federal programs will be preapproved by the Director of Consolidated Funds. In accordance with 200.421 (e) (2) (i) & (3), unallowable advertising and public relations costs include: costs of displays and exhibits and costs of promotional items and memorabilia, including gifts and souvenirs. In the event Tattnall County School System experiences difficulty recruiting and retaining highly qualified and highly effective core academic content teachers a financial incentive may be funded by federal funds. If this option is chosen, Tattnall County School System will document 1) the need for the expenditure 2) the criteria for selection and 3) the rationale for the amount awarded.

Stipend Procedure

The Tattnall County School District will award stipends 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 district initiative and/or product, and/or specific goal(s); 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; and
- Documentation is provided to the Tattnall County Title II, Part A Director 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. (Documentation must be signed by the principal/designee or program director. Documentation must include agenda and sign-in sheet.
- Procedures for granting stipends will be consistent with federal and nonfederal funds and compliant with the State Board Rule. (LEA guidelines will be followed consistently regardless of funding source. Certified employees participating in professional learning outside the normal contracted hours will be compensated at a rate of \$25 per hour.

Funds budgeted for professional learning shall be used to enhance the knowledge, skills, practices, and dispositions primarily of certified personnel related to improving teaching and learning as measured by student achievement. Expenses may be provided for additional coursework and/or certification endorsements earned at the request and approval of the Tattnall County School District to meet an identified need. In accordance with *160-3-3-.04 Professional Learning*, State and federal funds designated for professional learning shall not be used to pay stipends to school board members or to school council members who are not employees of the Tattnall County School District.

Professional Qualifications

The Tattnall County School System takes pride in our efforts to ensure that our teachers and paraprofessionals meet the professional qualifications required by the state. The Curriculum Director and Human Resource Director works directly with principals on the hiring and placement of teachers and paraprofessionals. The Human Resource Director discusses all pertinent information applicable to certification and/or professional qualifications with principals and program directors. Documentation of leadership PLCs is maintained by the Director of Human Resources. A written professional qualification plan is developed any time a non-

qualified placement is made in the district or when an employee is assigned to a position where they are not considered in-field or professionally qualified. All employees holding the IN4T certificate are monitored at the district level through a certification plan. This plan is developed with the teacher, school administrator, and Human Resources Director. The Human Resources Director in collaboration with the principal, program director and employee will collaborate to identify the necessary professional learning activities, tests or other certifications needed. The building administrator monitors the status of the plan and determines if adequate progress is being made. In order to assist non-qualified teachers to satisfy the requirements in their plan, the district may provide registration support and reimbursement of testing fees when requested by the district. Each plan includes specific action to become professionally qualified/in-field and timelines and target dates are set that will enable the teacher to attain the appropriate status as soon as possible. Title II funds are transferred to Title I and consolidated. Funds from the consolidated budget may be used to reimburse teachers who pass the GACE testing required by their plan and requested by the district. It is the goal of the Tattnall County School District to hire only qualified paraprofessionals. Should a non- qualified para be hired or if their certificate lapses, a professional qualification plan will be developed, implemented and monitored by the building administrator and the Human Resources Director. If the teacher/paraprofessional already has a plan in place, then it is updated for the new year with specific timelines and signatures of the building administrator and staff member. A copy is sent to the Human Resources Director in the Fall and again in the Spring with updates. The Human Resources Director signs the plan at the end of each school term to determine if the plan is complete or needs to be continued.

Once a professional qualification plan has been implemented, it is monitored by the building administrator and Human Resources Director. The Human Resources Director monitors the certification data provided by the Professional Standards Commission routinely to address the issue of a teacher without a clear renewable certificate. Teachers who hold NT certificates are identified at the beginning of the school year or when placed and each teacher is monitored by the building administrator and Human Resources Director to ensure progression is made toward obtaining the state required professional qualifications or clear renewable status. Administrators are reminded at monthly administrative meetings of their responsibility of ensuring all current and personnel meet state qualifications although the district is a SWSS. At a minimum, the professional qualification plan developed for the employee is reviewed each semester by the building administrator. If the employee fails to meet the guidelines or timelines of the plan, the superintendent may not choose not to offer a contract for the upcoming school year.

Recruitment, Placement, and Retention of Qualified, Effective Teachers

System employees continue to attend regional and state recruitment fairs when possible. Recruitment materials are updated annually to highlight district progress and achievements. Tattnall County continues to offer a local supplement as an incentive for employment in the district even during times of budget reductions. The system continues to be proactive and look for qualified personnel for employment. Each school generates a list of teacher needs and incounty transfers are considered until the end of April annually. Position advertisements are listed on Teach Georgia and applications are encouraged throughout the year. Each administrator has access to all applications for vacant positions through the GaPSC portal. After onsite applications are received and reviewed, information is sent to the school based on the identified site needs. Interviews are conducted at the site level. Recommendations for employment of teachers and paraprofessionals are completed by the site administrator and sent to the Title II, Part A Director who forwards to the Superintendent for approval before being presented to the Board of Education. The mobility of personnel continues to be a concern for Tattnall County. It is the responsibility of the site administration to assign teachers for the entire day to classes for which they have professional qualification credentials to be considered in-field. This is discussed with principals on an ongoing basis and individually with central office staff.

The Tattnall County School District works to retain professionally qualified, in-field teachers for all schools. The system has a mentoring program for personnel new to our system and those with less than three years of experience which has been updated for FY19. The instructional specialist and on-site PLC Facilitators work with teachers on a variety of concerns. There is constant communication and support for new personnel to determine the most urgent concerns. Classroom visitation and observation is ongoing. Grade and/or content transfers, as well as professional learning, may be a solution for an addressed concern. The overall certification plan and/or professional learning goal for employees may require additional content tests, college coursework, etc. Fund 150 may provide reimbursement for the individuals passing the GACE content test when requested by the district. Instructional support and job embedded professional learning is organized at each elementary and middle school site by school level Curriculum Specialists and leadership teams. District level program specialists provide additional training to support teachers in their efforts to deliver effective classroom instruction when needed. Formal evaluations at the school sites, utilizing the approved format (TKES), allows for individual teacher support through a professional development plan, when needed. This plan provides specific content activities for the individual with follow-up support to include classroom monitoring, as required.

Teacher Effectiveness

To review teacher effectiveness, Tattnall County School System reviews data during the Comprehensive Needs Assessment, such as: student achievement data, TKES data, attendance, equity data, and CCRPI data. Consideration is given to class grades, test scores, focus walk data and pass/fail rates. Holistically, this allows the district to identify teachers who are effective as well as ineffective.

Principals have site specific information necessary for placing teachers in grade levels/content areas within their school. In both individual and group settings, administrators discuss with central office personnel their placements during leadership PLCs when needed. Administrators are in continuous contact with program directors via email and telephone. Monitoring takes place from the central office during data reporting periods. If effectiveness and experience issues are recognized, the central office staff administrative team and principal meet for options. A goal for the school district is that all students will have equal access to effective teachers. Professional development plans are in place to assist teachers in becoming more effective.

Mentoring and school level support from Curriculum Specialists and PLC Facilitators are available onsite as additional support.

The Tattnall County School System uses the assessment tool Teacher and Leader Keys (TKES and LKES). These assessment tools monitor effective performance of all teachers. Decisions are made for additional mentoring, change in student schedules, professional development, or classroom visitations if concerns are identified. Low performing teachers will be assigned an onsite mentor and/or a curriculum specialist to assist in lesson planning, instructional delivery and student engagement. The student information system provides detailed enrollment history that can be used to further monitor the placement of individual students with experienced and effective teachers.

Administrators are reminded to ensure that no student has an inexperienced, ineffective teacher for two years in a row. Site administrators with the help of the school counselors and curriculum specialists, make initial decisions about student assignments. Site administrators have access to information on students who were taught by an inexperienced or marginal teacher through the student information system, PowerSchool. Principals and central office staff also review each teacher's annual performance and student growth measure when available to determine teacher effectiveness. When students are placed for the next year, these students are assigned to an experienced and effective teacher. Professional development plans are in place to assist teachers in becoming more effective following the requirements set forth by GaPSC. All educators employed in a public LUA who hold certificates must be involved in job-embedded professional learning based on educational goals for the individual educator, the school, and the local unit of administration (LUA) aimed at assisting students in meeting state standards for student achievement.

Written Professional Learning Goals (PLGs) and/or Professional Learning Plans (PLPs) are required for all certified holders. The goal is for all PLGs and PLPs to be reviewed/updated annually by October 31. However, multiyear PLGs or PLPs may be utilized. Professional Learning Plans (PLPs) are required for all certificate holders meeting the following criteria:

- 1. Induction level educators (three years of experience of less)
- 2. Educators in positions requiring them to hold non-renewable certificates;
- 3. Educators who are working in a service of leadership field with fewer than three (3) years of satisfactory experience in that field;
- 4. Educators who were not employed by a Georgia public LUA in a position requiring certification at the time of their most recent certificate renewal who the reentered the profession;
- 5. Educators who have less than one (1) year of educator experience in Georgia;
- 6. Educators who have received any unremediated annual summative evaluation rating of Needs Development, Ineffective, or Unsatisfactory during the previous five (5) year validity cycle of their certificate. The PLP for these educators shall be included in the remediation plan developed according to procedures outlined in GaPSC Rule 505-2-.43 Annual Performance Evaluation.

Procedures for Instructional Paraprofessionals

Paraprofessional applications are accepted on an ongoing basis. Vacancies are filled from existing applications or through the substitute teacher candidate list. All instructional paraprofessionals hired must be qualified. All paraprofessionals must have:

Completed at least 2 years of study at an institution of higher education or

Obtained an associate's (or higher) degree; or

Meet a rigorous standard of quality and can demonstrate, through the Georgia state approved paraprofessional assessment (GACE for Paraprofessionals)

Knowledge of, and the ability to assist in instructing, reading, writing, and mathematics; or

Knowledge of and the ability to assist in instructing, reading readiness, writing readiness, and mathematics readiness, as appropriate.

All Georgia paraprofessionals must hold a valid state paraprofessional certificate issued by the Georgia Professional Standards Commission as well as a Clearance Certificate.

At this time the Tattnall County School System does not fund any instructional paraprofessionals directly out of Title I, II, III, or IV funds since those funds are transferred or consolidated. If this changes the following will be implemented:

- Specific program directors will train paras on best practices.
- A signed schedule documenting the paraprofessional is under the direct supervision of a certified teacher must be submitted to the Director of Consolidated Funds prior to the 15th day of school.

Procedures for Parent Notification

In Georgia, in accordance with ESSA, all LEA schools/programs are required to notify parents at the beginning of each school year of their 'Right to Know' the professional qualifications of their student's classroom teachers and paraprofessionals. In Georgia, notifications must occur within 30 calendar days from the start of school or upon enrollment.

For verification purposes, notifications must contain the month/year of dissemination or, if included in another document, the primary document must contain a date. Or, if the primary document is not dated, records may also include supplemental documentation that contains the month/year of notification dissemination. For verification purposes, the name of the LEA and/ or school must be included. All requests will be forwarded to the Human Resource Director who will respond in a timely manner.

Records of annual notification(s) from all LEA schools or programs will be maintained by the Tattnall County School District Parent and Family Engagement Coordinator.

Although ESSA does not prescribe the exact method of dissemination for notifications, the Tattnall County School System Parent and Family Engagement Coordinator will insure that all parental notifications are sent in compliance with all Federal Programs. The Parent's Right to Know is disseminated in the following ways:

- The letter is provided to all parents attending open house at each school prior to the first day of school.
- Each school's website, as well as the district website, have links to the document in English and Spanish.
- Each school's handbook includes the Parent's Right to Know. Each student receives a copy on the first day of school or upon enrollment. Parent signature is required showing receipt of the handbook.
- The Parent's Right to Know is included in each school's School-Parent Compact, which is distributed annually prior to November 1.

20 Day Notification

Parents are informed when their child has been taught for 20 or more consecutive days by a teacher who does not meet applicable professionally qualified requirements at the grade level and subject area in which the teacher has been assigned. A principal and/or the Payroll Department will email the Human Resource Director when a teacher has been out 20 consecutive days. The Human Resource Director will provide a letter to the principal that meets the parent notification requirements if required. The principal will date and sign the letter. The parent letter will be forwarded to the applicable parents by the principal. A copy of the letter sent to the principal will be maintained as documentation by the Human Resource Director. A list of students and a copy of the letter will be maintained as documentation by the principal. The principal will send a list of students and a copy of the letter to the Federal Programs Director to secure documentation for monitoring.

Section 16: English as a Second Language (ESOL)/Title III

Policies and Procedures

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

English to Speakers of Other Languages (ESOL) is the state-funded language instruction educational program for eligible English learners (ELs) in grades K-12 in Georgia public schools. The ESOL Language Program was first established in 2002 by the Georgia General Assembly (State Board of Education Rule 160-4-5-.02). The purpose of the ESOL language program is to provide English language development instruction and language support services to identified K-12 English Learners (ELs) in Georgia's public school systems for the purpose of increasing their English language proficiency and academic achievement. The responsibility for educating the whole English Learner child, both in language development and academic content, is shared by regular classroom teachers and English language specialist teachers alike. Classroom teachers, ESOL teachers and other support staff should collaborate to determine instructional scaffolds and language-focused activities needed to make language and content as comprehensible as possible for ELs throughout the entire school day. As a result, all teachers function as academic language teachers when EL students are enrolled in their classes.

Under Title VI of the Civil Rights Act of 1964 (Title VI) and the Equal Educational Opportunities Act (EEOA), public schools and State educational agencies (SEAs) have a legal obligation to remove barriers and ensure that students who are not fully proficient in English can meaningfully participate in their educational programs and services. These federal expectations require schools to develop and implement an evidence-based language instruction educational program (LIEP) that has a reasonable chance of success and which allows EL students access to grade-level core curriculum to succeed in the general education classroom.

According to Lau v. Nichols (1974), public schools comply with their legal obligations under Title VI of the Civil Rights Act of 1964 (Title VI) by taking affirmative steps to ensure that students with limited English proficiency can meaningfully participate in educational programs and services. In addition, the Equal Educational Opportunities Act (EEOA) requires public schools and State educational agencies (SEAs) to overcome language barriers that impede equal participation of students in their instructional programs. Finally, the Office for Civil Rights (OCR) at the U.S. Department of Education and the Civil Rights Division at the U.S. Department of Justice (DOJ) share authority for enforcing Title VI in the education context. Recognizing the universal importance of education, the federal government assumed a larger role in financing public schools with the passage of the Elementary and Secondary Education Act (ESEA) in 1965. Through subsequent reauthorizations, ESEA has continued to assist the states in establishing accountability for results and improving the inclusiveness and fairness of American education.

Tattnall County School System receives direct Title III allocations. (We follow COF guidelines.)

Program:

The core ESOL language program is a civil right offered by all public schools in Georgia to K-12 students with a home language other than English who qualify based on a state-approved language screener. (See Georgia State Board of Education Rule 160-4-5-.02.) Various researched-based language program delivery models are used across the state to provide scheduled English Language Development (ELD) courses, collaborative ELD services with language-differentiated supports within content classrooms, language instruction computer software programs, sheltered content courses, and dual language instruction to more than 120,000 EL students in Georgia.

ESOL language instruction is focused on developing EL students' academic English proficiency in each content area of the Georgia Standards of Excellence (GSE). The WIDA Consortium English Language Development (ELD) Standards aligned with the GSE guide the work of ESOL teachers. Differentiated instructional practices, both in ESOL and general education classes, ensure that the language development needs of Georgia's EL students are met. In ESOL language programs it is appropriate, when practicable, to use the student's home language as a means of facilitating instruction and providing limited English-proficient (LEP) parents with school-related information.

Framework for EL Programs: Systems of Continuous Improvement

Georgia's System of Continuous Improvement frames the work of EL Language Programs. First, daily English language instruction for EL students take place within a Coherent Instruction System. Professionally qualified ESOL teachers and school leaders teach and assess EL students as part of the Effective Leadership and Professional Capacity Systems. Schools reach out to engage EL parents and their families within the Parent & Family Engagement System, and EL students are provided with wraparound, culturally responsive services within the Supporting Learning Environment of schools. The process of Continuous Improvement is framed as a problem-solving cycle around these five systems. It includes identifying the needs of EL students, selecting appropriate language-focused interventions, planning to implement and then implementing such interventions, either within the core classroom instruction (ESOL) or as a supplemental language program (perhaps federally-funded); and, finally, examining EL students' progress on a continuous basis to make the necessary changes to the language interventions or

programs as applicable. In participating local education agencies (LEAs), Title III, Part A Language Program funds provide supplemental language instruction to select EL students who may need additional language instruction and support beyond the core, OCR-required state-funded ESOL language program.

Currently Tattnall County serves 5 schools: 1 High School, 2 Middle Schools, and 2 Elementary schools. Tattnall County employs 10 teachers as ESOL teachers and 1 teacher as an ESOL Resource Lab teacher. All possess either ESOL endorsement or certification; some both. 10 are full time ESOL with 1 employed at 49% and only serves a few segments of ESOL per day. There is one ESOL County Coordinator (49%) and one Federal Programs Director (Title III).

Purpose

Our ESOL program plan is designed to provide consistent and non-discriminatory procedures throughout each school within the Tattnall County School District as recommended by the U.S. Office for Civil Rights, Department of Education. The Civil Rights Act of 1964 requires local school districts to provide an alternative program of service when there are students who are limited English proficient and are unable to participate effectively in the district's regular instructional program.

The responsibility for educating the whole English Learner child, both in language development and academic content, is shared by the regular classroom teachers and English language specialist teachers alike. Classroom teachers, ESOL teachers, and other support staff should collaborate to determine instructional scaffolds and language focused activities needed to make language and content as comprehensible as possible for ELs throughout the entire school day. As a result, all teachers function as academic language teachers when EL students are enrolled in their classes.

Goal:

The goal of the ESOL language instruction educational program for EL students is to increase both English language proficiency (ELP) and academic language proficiency in content-area subject matter. Successful ESOL language programs focus on collaboration and shared accountability for the success of all EL students.

At the beginning of each year or as new students enroll, Tattnall County provides every regular education teacher with current ACCESS score reports and Can Do Charts (for grouping) so that lessons can be differentiated between reading, writing, listening, and speaking skills. All Tattnall County ESOL instructors are either ESOL endorsed or ESOL certified. Tattnall County also offers ESOL classes to certified teachers who are interested in becoming ESOL endorsed and will pay for the certification test once the GACE certification is obtained. This opportunity allows for more regular education teachers to understand the EL learner and be better prepared to help them in the general education classroom. Currently, Tattnall County has 48 teachers who have ESOL endorsement/certification (including the current ESOL teachers). There are 15 teachers with P-12 Certification and 38 with ESOL Endorsement. Tattnall County encourages currently hired teachers to pursue the ESOL certification and/or endorsement. Funds are available to assist in obtaining endorsement/certification. Currently, TC utilizes the following delivery models: Push-in, Pull-out, Resource Lab, Scheduled Language Acquisition, and can use the Innovative Model as needed.

Tattnall County School System has an EL Plan for 2022-2023 that include EL policies and procedures, research-based/state approved delivery models used at each school, a description of how ACCESS scores are used to make instructional decisions, progress monitoring procedures for EL students, and the process and criteria used for transitioning ELs to monitored status. The Student Information School Improvement Specialist codes EL-eligible students in the student information system (PowerSchool). The Tattnall County School System's professional development plan for ESOL includes a needs assessment (drawn from the Comprehensive Needs Assessment). Meeting dates, session agendas, handouts, and sign-in sheets are kept on file in the schools and at the district office level.

Beginning in 2022-2023, TC will start the process of completing the Assessing the Needs of the EL Program using the new updated forms found in the English Learner Data Process Guide and Assessing EL Language Program Needs for the CNA Guide. This process will be on-going throughout the year, but will culminate at the CNA Meeting held each Spring.

Title III funds are consolidated in Fund 150, however, the budget and purchase orders are approved by the Federal Programs Director who makes sure that each requisition complies with the Intent and Purpose Statement from each school regarding Title III expenditures. No personnel in Tattnall County Schools are funded through Title III. Tattnall County School System has no private schools requesting to participate in the Title III program at this time.

Tattnall County School System monitors its Title III program to ensure that it is sufficient to ensure compliance with Federal program requirements. Evidence includes written procedures used to monitor all critical ESEA requirements of the Title III program and its implementation at the district and schools (where applicable), including procedures that delineate the steps Tattnall County Schools uses to monitor and provide technical assistance for the implementation of the Title III program. These procedures shall specify how the district monitors the Title III program to include:

- 1. position(s) responsible: Title III Director/ESOL Coordinator
- 2. frequency of monitoring: quarterly
- 3. list of documentation that will be maintained to verify the Title program has been monitored: PLC documentation, requisitions approved to support intent and purpose, ESOL list by school in Power School, ESOL teacher meetings if conducted (agenda, materials, sign in sheet), copies of surveys given, ESOL teacher teaching certificates, WIDA certificates for ESOL teachers)
- 4. needed corrective actions at schools as identified by the LEA

- 5. follow-up/verification of corrective actions at schools and district identified by the LEA
- 6. review of applicable federal program budgets: Consolidation Site (Title III Director maintains draw down documentation.)
- 7. description the LEA uses to identify high risk schools within the district (ACCESS Scores/Annual CCRPI data)

Monitoring of the Title III, Part A Language Instruction Program in Tattnall County Schools ensures compliance with regulations and assures the quality of the program and the instructional delivery being provided to English learners. It is a process of systemically providing technical assistance and collecting data in order to provide information that can guide program implementation and monitor school improvement. Tattnall County School System makes use of monitoring to ensure that all activities are carried out in accordance with federal guidelines and Title III's intents and purposes.

Tattnall County School System participates in the Consolidation of Funds Initiative and consolidates Federal, state, and local funds. The Director of Consolidated Funds and the district Title III/ESOL director are responsible for providing technical assistance to the schools, as needed, and for monitoring the Title III program expenditures to verify that the expenditures comply with the intent and purpose of the Title III program in each school. The Director of Consolidated Funds/Federal Programs Director maintains all documentation related to Title III funds and also conducts quarterly monitoring of all schools and programs to ensure compliance with applicable program requirements and the intent and purpose of all federal programs.

Use of Title III funds and program implementation at the school level is monitored through ongoing technical assistance provided through regularly scheduled (at least monthly) PLCs, emails, and phone calls between the district Title III director, ESOL Coordinator, and ESOL instructors, examining student schedules and academic data, evaluating ESOL instructors' classroom observation data provided through the TKES platform, and reviewing purchase orders submitted by the schools specific to meeting the intent and purposes of Title III funds. ESOL teachers and school administrators communicate directly with each other to determine the needs of ELs. The district administrative team meets at least quarterly with school administrators to discuss schoollevel needs, as well as updates, information, and guidelines relating to federal programs. The district Title III/ESOL director and ESOL Coordinator also communicate with school administrators as needed through phone calls, emails, and face-to-face meetings.

ESOL language instruction is focused on developing EL students' academic English proficiency in each content area of Georgia Standards of Excellence (GSE). *Tattnall County uses the 2020 WIDA Consortium English Language Development (ELD) Standards. Differentiated instructional practices, both in ESOL and general education classes, ensure that the language development needs of EL students are met.* In ESOL language programs, when practicable, it is appropriate to use the student's home language as a means of facilitating instruction and providing limited English-proficient (LEP) parents with school-related information. Tattnall *County will begin a 3-year implementation plan toward full use of the new WIDA 2020 English Language Development Standards Framework by 2023-2024 school year. FY23 ESOL teachers* completed a 1-day WIDA Training provided by WCEPS: Building Capacity to Bridge Content Learning and Language Development. FY22 ESOL teachers completed the WIDA 6 module selfpaced eCourse.

Eligibility for entry into language assistance:

1. Prior to entry (for the first time) into a school in the United States, each student's parent or guardian will complete the required Home Language Survey to determine if a language other than English is used in the home or if the student's native language or first language is not English. All students whose native language, first language, or language of the home includes a language other than English shall be assessed for English language proficiency using the stateadopted English proficiency screening measure. Kindergarten and newly enrolled students should receive a one-time HLS to complete. The HLS is a ONE TIME document. Student must be assessed and placed within 30 days of enrollment and parents notified of placement within 2 weeks after placement. Tattnall County utilizes the WIDA on-line screener. All ESOL teachers must complete WIDA online training modules annually **and** pass the test for each applicable section prior to giving the WIDA screener. Certificates are sent to the Testing Coordinator, Federal Program Director, and ESOL Coordinator to file. Each school's registrar will collect the original copy of the HLS in English (and Spanish or primary language if other). This document is duplicated on goldenrod paper for easy identification. If another language is needed for the HLS at any time, the registrar will have a notebook of all languages that the GaDOE provides and a packet about Registering Students with non-English Names. A copy of the HLS is immediately given to the ESOL teacher for further assessing, and the original is placed in the student's Permanent Record. A copy is placed in the student's ESOL file maintained by each ESOL teacher. Currently, there are three languages currently spoken in Tattnall County: Vietnamese (2 students), Gujarati (1 student), French Creole (1) and Spanish for all remaining students. Identification and assessing of potential EL students will be conducted in a timely, valid, and reliable manner. PreK students will be given the HLS in the Spring of the PreK year. Based on HLS answers, Elementary ESOL teachers may evaluate PreK students. This evaluation will take place in April and/or May. ESOL teachers will use the Kindergarten Screener as the form of evaluation.

Please note:

- IF the answer to ANY of the three required state questions indicated a language other than English, the student is considered a potential EL and must be the administered the WIDA screener. Parent permission is not required to administer the ELP screener.
- *IF the answer to the three questions is English, the student* <u>SHOULD NOT</u> *be administered the screener.*
- *IF the answer lists several languages, the school must interview the parents to determine which is the child's primary or dominant language. An addendum process may be needed at this time.*

Pre-Kindergarten Students: If students are screened towards the end of Preschool, the 30-day window starts the first day of Kindergarten. Although all students enrolled in a Pre-Kindergarten program will most likely use the 1st day of Pre-Kindergarten as the U.S. school start date, the 1st day of Kindergarten, not Pre-Kindergarten, is considered by U.S.D.E. as the official start date for

EL eligibility (and/or Immigrant eligibility). Since an LEA must administer the ELP assessment annually to all ELs in schools served by the state in all grades in which there are EL students, Kindergarten through Grade 12, an LEA should only include students in Kindergarten through Grade 12 for all EL student and Immigrant student reporting requirements under Title III, Part A. [See 34 C.F.R. §200.5(a)(2).] *TC will send home HLS beginning in February/March to ensure that each student has one on file when screening begins in April or May of PreK year.*

2. Initial eligibility for language assistance services shall be determined by the student's score on the state-adopted English proficiency screening measure. *Tattnall County follows state guidelines to make sure that each student who may be an EL is assessed within 30 days of enrollment using the on-line WIDA screener for grades First grade 2^{nd} Semester -12^{th} grade. <i>Prek-1st Semester First Grade will be assessed using the Kindergarten WIDA Screener.*

**Only the new WIDA Kindergarten Screener will be used to identify potential EL students in the upcoming 2022-2023 Kindergarten class, continuing through Kindergarten, and 1st semester Grade 1 students only.

3. Students who have an English language proficiency score below proficient on the stateadopted English proficiency screening measure shall be determined to be English learners (ELs) and shall be eligible for language assistance services. *Tattnall County ESOL teachers will use the state mandated entry scores for qualification for services. Registrar will be notified immediately for coding purposes using the Student Services Form. Screener score sheet will be placed in the ESOL student file. The EL Screener Tab in SLDS and School Information System (Power School) will be updated. An Initial Notification placement letter will be sent home notifying parents of placement. A copy of the same letter will be put in the student permanent record and ESOL file. See Flow Charts in Appendices for specific guidelines for each grade level. Depending on semester that student enters, please refer to chart on page 17-18 of Resource Guide to know which cluster to use for testing. Notification to parent on eligibility should be given within two weeks of placement.*

4. Students who have an English language proficiency score at or above proficient on the stateadopted English proficiency screening measure shall be considered English proficient and shall not be eligible for language assistance. *Tattnall County ESOL teachers will update EL Tab showing the student is not eligible so that the student will not be retested erroneously at a later date.*

5. The following guidelines are for Potential ELs with Disabilities:

- Screening Potential English Learners with Disabilities (or Suspected Disabilities) Students with disabilities established in an IEP or 504 Plan whose home or primary language is not English, must be administered the appropriate WIDA ELP Screener with the appropriate accommodations as established in the IEP. Accommodations must be documented in the GO-IEP or other IEP platform the school system is using. Please contact the Special Education department to ensure the accommodations on the ELP Screener are appropriate to the disability.
- Students with Identified or Suspected Disabilities that Preclude Screening of One or More Language Domains 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 should seek counsel from the GaDOE Assessment Division who would consult with Special Education and EL Learner Programs. Caution should 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 who 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.

- 1. 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.
- 2. The committee meeting minutes must be maintained in the student's cumulative record along with notes supporting the committee's decision.
- 3. 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.
- 4. 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.
- 5. 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.

- 1. 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.
- 2. The committee meeting minutes must be maintained in the student's cumulative record along with notes supporting the committee's decision.
- 3. 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.
- 4. 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.

6. 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.

7. Certification to Administer WIDA Screeners

Annual WIDA certification is required for all certified personnel who will administer the WIDA Screeners. Only certified personnel who have completed the required WIDA training for the WIDA Screeners are permitted to administer them. The annual certification period runs from July 1 to June 30.

- To complete the training modules, educators must obtain a login and password to the WIDA secure portal from the LEA's System Testing Coordinator or ESOL Coordinator.
- The passing score for the WIDA Screener training quizzes is 80% or higher.
- LEAs must maintain test administrator certification evidence.

8. For testing security and to document ELP Screening Irregularities see page 18-19 in GaDOE Resource Book.

Transfer Student Guidelines:

******If a student is an in-state or out-of-state transfer student, then the LEA should first review prior school records to find the original HLS.

- 1. If a student was screened in a WIDA state and DID NOT QUALIFY (DNQ) as an EL, the student may not be screened again at a future date for reconsiderations of eligibility without prior state approval.
- 2. If a student was screened in a non-WIDA state and DID NOT QUALIFY (DNQ) by that state's eligibility criteria, the LEA *may consider* rescreening the student using the appropriate WIDA assessment if there is evidence that the student's level of ELP will be a barrier to meeting Georgia's Standards of Excellence.
- 3. LEAs may NOT consider re-screening when the DNQ non-WIDA transferring student:

- a. Was screened more than 24 months (or the equivalent of 2 academic years) prior to enrollment in the current LEA; and
- b. Was enrolled and was successful in the general education program in the previous school; and
- c. Performed at the met or exceeded level on that State's content assessments (if administered)
- 4. Visa or Foreign Exchange students Tattnall County presumes that exchange visitors are proficient in English to participate successfully in their exchange program and to function on a day-to-day basis in US schools. EL testing will not be required as long as evidence is provided by the sponsor in one of the following ways:
 - a. Results of a recognized English language test OR
 - b. Signed documentation from the academic institution OR
 - c. A documented interview conducted by the sponsor (in-person, video conference, or telephone)
- 5. If a student was enrolled in ESOL at the time of transfer, there is no need for screening. Student is deemed eligible by virtue of his/her services provided in the other state and should begin services immediately. However, the school should try to secure the original HLS and ELP screener scores

Eligibility for exit from language assistance:

- LEAs must administer the annual ELP assessment to ALL ELs (Kindergarten ACCESS, Grades 1 – 12 ACCESS for ELLs 2.0 and Alternative ACCCESS – as applicable) per Title 1 Part A requirement. *Tattnall County administers the ACCESS in the months of January through March. Each ESOL teacher is trained and certified to administer the* ACCESS. The certificate is filed with the Testing Coordinator, Federal Programs Director and ESOL Coordinator. For the 2021-2022 year, Tattnall County had a 100 % participation rate for ACCESS.
- 2. **Clear** exit determinations are based on the composite score of the state-adopted English proficiency measure (ACCESS). A student who exits the language assistance program via a clear exit determination shall be considered English proficient. A student must score 5.0 on the Composite score in order to have a clear exit. See Flowcharts in Appendices.
- 3. Students whose composite scores on the state-adopted English proficiency measure do not meet the score required for clear exit determination **may be** considered English proficient following an LEA's reclassification review. The reclassification review procedures are applied uniformly statewide, as established in ESOL Code 160-4-5-.02. *Tattnall County has adopted the state suggested range of ACCESS CPL 4.3-4.9 as possible exit criteria. The Reclassification Team/committee will meet and make a final decision on whether to exit student or not (using Reclassification Form and Data Point #2). Paperwork will be filed in the student ESOL file and student Permanent Record. If student exits, registrar and parents will be notified. An Exit Notification will be mailed to*

parents and placed in student file). All schools will use the last day of the current school year as the exit date. Score reports, any exit information, and an article explaining ACCESS scores are sent home at the beginning of the following year.

- 4. Students who are deemed English proficient shall not be eligible for continued language assistance services and shall be exited from language assistance services and monitored for two years. All schools will use the first day of the new school year as the M1 beginning date. Monitoring documents are collected each nine weeks for EL1 and EL2 students.
- 5. The OCR requires districts to monitor the academic progress of post-exit EL students for two calendar years (transfer students included). If a student begins to decline and requires a post exit reversal, state recommendations will be followed. *Tattnall County ESOL teachers are required to monitor students that are considered English proficient for two years after exit from language assistance services. These students shall be considered EL Monitored. Registrars will update monitoring status each year in SIS. The monitoring process shall consist of a documented review of report card grades, state assessment results, classroom performance and teacher observations for the purpose of ensuring the successful transition to the general classroom. This documentation will be kept in student ESOL file. If academic adjustments are needed during this two-year period, a Reclassification team will be convened to determine if EL services should be reinstated and why. Evidence will be provided and placed in student record.*
- 6. EXIT reason codes:
 - *1*-ACCESS for EL Proficiency
 - 2 N/A
 - 3 Exited out of state or from non-public
 - 4 EL Reclassification Team Decision

Alternate ACCESS Exit Procedures:

New for year 2019 were guidelines for Alternate ACCESS exiting procedures. *Tattnall County* will follow the approved guidelines provided by the state. A Reclassification Team will convene to make a decision if student meets scoring criteria for 2 or 3 years. (See information in Resource Guide for exiting ELs with Disabilities, pages 32-33)

What is the Reclassification Team Decision?

Reclassification is a term that is used when an EL student's ELP level reaches the state and LEA's definition of English proficient, and the student is exited from EL status and the student's status is reclassified from English Learner = Yes to English Learner Monitor Year 1. The intent of this form is that EL Reclassification Team WILL CONSIDER for exit all students whose ACCESS scores fall within the LEAs established range up to 4.9 OR Alternate ACCESS scores that fall within the state guidelines. The team may decide to exit some students and not exit other EL students. This form will provide the documentation for this decision.

ACCESS for ELLs:

• ACCESS for ELLs® is administered, annually, to all English learners in Georgia. It is an English language proficiency test designed to measure English learners' social and

academic proficiency and progress in English. It assesses social and instructional English as well as the language associated with language arts, mathematics, science, and social studies within the school context across the four language domains of speaking, listening, reading, and writing. *ACCESS for ELLs* meets the Title I mandate to evaluate the English language proficiency progress of all Grades K-12 EL students.

- Under the ESSA, all Grade K-12 students identified as English learners must take the *ACCESS for ELLs* English language proficiency (ELP) assessment annually, **including students whose parents have waived ESOL services, and including EL students with disabilities.** Federal Programs Titles I and III, Part A will be monitoring school system's EL ACCESS Participation Rates annually.
- Students who have formally exited language assistance services are not administered the ACCESS assessment, including those who just exited EL services (EL-1 & EL-2).

Tattnall County uses the ACCESS test as its form of determining English language proficiency. Once test results are received in the spring of each school year, ESOL teachers review the scores to determine if each student exits or remains in program. ACCESS scores are sent home to parents in English and Spanish (if applicable or other language) at the beginning of the following school year. ACCESS scores are filed in student ESOL file and in student Permanent Record. Continuation of Services letter or exit letter is sent home at the beginning of the following school year. If a student exits, the last day of school will be used as the exit date, and the first day of the next school year will be used for the M1 status date.

ACCESS for ELLs serves five main purposes. These include:

- determining the English language proficiency level of students;
- providing districts with information that will help them evaluate the effectiveness of their ESOL programs;
- providing information that enhances instruction and learning in programs for English language learners;
- assessing annual English language proficiency gains using a standards-based assessment instrument;
- providing data for meeting federal and state requirements with respect to student assessment.

Alternate ACCESS for ELLs:

Under the ESSA, all schools are required to assess annually the English language proficiency of all students identified as ELs, including students with disabilities.

• The Individuals with Disabilities Education Act (IDEA; 2004) also mandates those students with disabilities participate in statewide and districtwide assessment programs, including alternate assessments with appropriate accommodations, when it is documented in their Individual Education Program (IEP).

• WIDA's *Alternate ACCESS for ELLs* meets federal accountability requirements and provides educators with a measure sensitive to English language proficiency growth of ELs with significant cognitive disabilities.

• EL students who are eligible for the GAA 2.0 are the **only** EL students eligible for the Alternate ACCESS for ELLs. LEAs' assessment procedures for EL students will be monitored by Federal Programs, Titles I and III, Part A.

• English Learners with Disabilities (EL/SWD) may use state-approved accommodations when taking the ACCESS for ELLs or the Alternate ACCESS, as applicable. The IEP Team will determine which accommodations are needed using the WIDA list of approved accommodations.

Prior to testing, the ESOL teacher holds a TPC meeting to set any accommodations needed for EL students. The TPC form is updated yearly if new guidelines are put into place. This new form is shared with each ESOL teacher in the county by the end of September. A review is given during the ESOL Team Meeting in January. If an EL student is also SPED, the ESOL teacher should be invited to participate in the IEP meeting each year. Testing Coordinator and ESOL teachers at each school make sure that every ESOL student completes the ACCESS/Alternate ACCESS test each year.

Each ESOL teacher keeps a current ESOL student roster. During January, February and March, the Testing Coordinator and teachers check off as each student completes testing. When the deadline for the ACCESS testing window approaches, the District Testing Coordinator checks with ESOL teachers to see if there are any students who have not completed the test or look as if they will not complete. If there are any not tested, documentation will be collected as to why. The Testing Coordinator will also log on to AMS and check which students/domains have not been completed. This will be done 2 weeks before the testing window closes. She will notify individual ESOL teacher(s) if there are any who have not been tested yet. The District Testing Coordinator will keep a list of students who do not complete the ACCESS test within the testing window along with the justifiable reasons for not testing.

• Justifiable reasons can include but are not limited to: student moves/transfers to another school during testing window or student is sick for duration of testing window.

If a student transfers to the LEA from another location/state, the ESOL teacher will check with the previous LEA to see if student has completed ACCESS testing in another location before adding him/her for testing at new school.

Reporting Date of EL EXIT:

• ELs who have met the standardized statewide EL Exit Procedures Criteria must be exited from EL status. The EL Exit Date must be an end-of-the-school-year date no later than June 30. However, this date cannot be recorded in SIS until after July 1. Each year, after

July 1st, the student's post-EL Exit Status will change as depicted in the chart below. *Tattnall County uses the last day of school as its exit date.*

• 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. *Tattnall County uses the 1st day of school as its post exit date for monitored EL1 students.*

Language assistance service delivery models:

LEAs and schools shall provide English language assistance to all ELs. Such assistance shall be provided through the state-funded ESOL program or placement in a locally-developed language assistance program approved in advance by the Georgia Department of Education. *Approved instructional delivery models that Tattnall County utilizes are:*

- 1. Pull-out model students are removed from a general education class for the purpose of receiving small group language instruction from the ESOL teacher,
- 2. Push-in/Collaborative model (within reading, language arts, mathematics, science or social studies) students remain in their core academic class where they receive content instruction from their content area teacher along with targeted language instruction from the ESOL teacher,
- 3. A scheduled class period students at the middle and high school levels receive language assistance and/or content instruction in a class composed only of ELs,
- 4. Resource Lab -Students are pulled 2-3 times per week to work on ELD goals (WIDA Standards) in the area of reading, writing, listening and speaking and supplemented by multimedia materials or digital language learning resources.
- 5. An innovative delivery model approved in advance by the Georgia Department of Education, as needed.

Language assistance curricula:

Language assistance curricula in the state-funded ESOL program shall consist of plans of instruction, which are adapted to the English language proficiency of students and are designed to develop: 1) listening, speaking, reading, writing and American cultural concepts and 2) the language of academic instruction used in language arts, mathematics, science and social studies. Using ACCESS scores, both ESOL and regular ed teachers use the proficiency levels found in reading, writing, listening, and speaking to differentiate instruction in the classroom. *The delivery models Tattnall County use are educationally sound and proven successful and are all state approved models*.

Effective Language Instructional Educational Plan (LIEPs):

What criteria should LEAs receiving Title III-A funds use to ensure ELs are provided "effective" LIEPS, as required under ESSA?

At a minimum, LIEPs should be outcome-driven; an LIEP should provide results in improved English language proficiency and academic achievement for ELs to be considered "effective" for purposes of the Title III requirements. This should be:

- 1. Data driven Tattnall County uses ACCESS scores and Georgia Milestones (grade applicable)
- 2. Strong evidence based on rigorous, relevant research: WIDA Standards and Inclusion model

According to 2022 data, Tattnall County ACCESS results show the following: 40 students achieved proficiency to exit program; 9 were automatic exits; 3 was SWD exit, and 28 were 4.3-4.9 Reclassification. There were 217 ESOL students on roll for that current school year who were assessed. This results in a 18.43% of ESOL students who reached state level proficiency levels.

Notification to Parents of English Learners

In both Title I and Title III, under the Elementary and Secondary Education Act (ESEA), the overarching parent and family engagement law regarding notices to parents of English Learners (ELs) is now under Title I, Part A, Section 1112(e)(3) in the Every Student Succeeds Act (ESSA).

Student Primary Language: indicates the student's primary spoken language if other than English.

- 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: indicates the language preference of the parent for written communication between the school and the family. Beginning in 2019-2020, the following question is required under ESEA/ESSA Title I, Part A as part of the Registration and Data Collection Processes and was added to the TC HLS 3 question survey:

In which language would you prefer to receive school communication?

Tattnall County adds this comment to the bottom of its HLS.

Parent Notification for Supplemental Title I and/or Title III Language Program Services (when applicable).

If the LEA receives Title I or Title III, Part A sub grant and is providing EL students with additional, supplemental language instruction educational programs, federal statute requires parents be notified of this program no later than 30 days after the beginning of the school year. For newly identified ELs during the school year, parents must be notified during the first two weeks of the student being placed in the supplemental program in addition to the ESOL program

The Tattnall County System will disseminate a Title I compliant letter that notifies parents if their EL student is being offered federally-funded supplemental language services. Upon identification of a student as an English learner, a letter must be sent to notify parents of their child's qualifications for Title III services. This letter, among other things, offers the parent the choice to allow or refuse the title-funded service. Notice will be provided to parents of English Learners no later than 30 days after the beginning of the school year who are placed in a supplemental language program funded by Title I, Part A or Title III. As documentation of Notification to Parents, signed and dated district documentation of the notification will be kept in the student's ESOL Student Folder. Staff will retain a statement indicating the language(s) and date(s) the notification was distributed. For those children who have not been identified as ELs during the school year, the school district will notify the children's parents during the first 2 weeks of the student being placed in the supplemental language program. *Currently, Tattnall County serves no students under this capacity. We are not required to send home this notification due to the Consolidation of Federal Funds.*

Parent Waiver:

Parents have a right to Opt-out/Waive ESOL Language Program Services. *This form MUST be completed yearly and filed in the student's ESOL record. Data clerk must code student in SIS.*

Schools' Civil Rights Obligations to English Learner Students and Limited English Proficient Parents:

The obligation not to discriminate based on race, color, or national origin requires public schools to take affirmative steps to ensure that limited English proficient (LEP) students, now more commonly known as known as English Learner (EL) students or English Language Learners (ELLs), can meaningfully participate in educational programs and services, and to communicate information to LEP parents in a language they can understand.

What if an EL student has been misidentified?

New Guidance as of 2019-2020: An erroneously identified EL is a student who was identified as an EL but should not have been because the student does not in fact meet the definition of "English Learner" in ESEA section 8101(20). An erroneous identification of EL = Y student

may have occurred as part of the initial identification process (due to parent's inaccurate completion of the HLS, administration of the ELP screener without providing for appropriate accommodations for students with disabilities, inaccurate scoring on the annual ELP assessment, or other reasons.)

In order to change a student's incorrect EL=Y status, each LEA must have established written procedures. *Tattnall County procedures are:*

- If a parent notifies LEA that that original HLS answers are not correct, a review will be conducted.
- If LEA deems the request plausible, the parent will be given the opportunity to complete a HLS Addendum. (Forms are located on Ga DOE website.) The addendum requires that parent's signature to be notarized and should be in the language parents understand.
- *Title III/ESOL Coordinator will approve the new HLS Addendum.*
- LEAs will proceed to take the next steps based on the new HLS.
- If the next steps require a status change, the LEA will code the EL=I code for the remainder of the school year to show that the student was incorrectly identified as an EL.
- After the June 30^{th} sign-off, the student will be coded as EL=N from then on.
- LEA will keep all documentation in student's file and report to GaDOE via secure portal message system and by June 30th the following:
 - o Student Name
 - Student's Grade Level
 - Parent's Reason for change
 - Name of person who approved the status change
 - Former status code
 - New status code
 - Date status change was effective (saved in the following format: District.Year.TitleIII.EL-ICodeReport)

Other Important Details:

- All Tattnall County ESOL program teachers hold necessary and appropriate ESOL endorsement or ESOL certification issued by the Georgia Professional Standards Commission.
- Tattnall County requires 3 County Wide ESOL Teacher Team Meetings per year to be held in August, January, and April. However, team meetings will be added as needed throughout the year. These meetings are used to present new guidelines/information for the upcoming year, as a review for policies and procedures, as a way to handle any issues or concerns, and as a method to provide professional development opportunities. Agendas and sign in sheets and any applicable handouts are created and filed for documentation purposes.

- Tattnall County ESOL teachers are required to read the Georgia ESOL Handbook and State Summary as well as the Tattnall County Handbook and to have it saved on their desktop for reference as needed. At the first county team meeting, the handbook is discussed in depth. Teachers will sign off on a Google Form stating all information has been read.
- Students entering the country for the first time or those with very limited English will be placed on Rosetta Stone (or other software/web sites)to help build English Language Acquisition. Each school purchased sets of Ambassador Waverly Ear Buds for use with newcomers to the area. IPads are available for students/staff to help with translation issues.
- Each Wednesday an email is sent out to everyone in the county (all staff). It is called WIDA Wednesday. The purpose of this is to give staff a <u>brief</u>, <u>quick</u> look into resources that can be used for EL students. It provides a snapshot of PL information rather than having everyone sit through after school meetings or PLCs. Teachers will sign off at the end of the year through Google docs to verify receipt.
- Two face-to-face Professional Development meetings are held at each school, one per semester. This can be in PLC format, after school or however each school makes it work. New teachers to the county will receive an in depth presentation on all things ESOL.
- Because of COF, more EL students are now able to attend After School Tutoring, During School Tutoring, After School Remediation, Saturday Slam, and/or other tutoring services. Each school files documentation.
- ESOL teachers are required to complete a data chart once ACCESS scores come in. They use this to compare scores from year to year in order to see areas where students need the most help. We are currently working on adding a Data Profile for each ESOL student and this will be part of our 3-year 2020 WIDA Standards implementation plan. We use the ACCESS scale score to analyze growth.
- All forms needed for ESOL teachers are uploaded to an ESOL Google Classroom. These forms are reviewed each year by the ESOL teachers and changes are made (if needed). The ESOL Coordinator updates the forms at the beginning of each year so they are current. Google Classroom is used to share other vital ESOL information with teachers.
- ESOL teachers provide the registrar with a Data Services Form. This contains date of ELP Screener, current ACCESS scores, etc. Demographic information needed for ACCESS testing is included on this form as well and is hared with the testing person at each school.
- ESOL teachers are required to complete an end of year documentation form called Record Keeping and Maintenance. This form requires ESOL Teachers to check and

verify that certain documents are in the ESOL teacher file. At the end of each year, an ESOL colleague signs off on the Record Verification Form.

- The EL Permanent Record Form and Checklist requires ESOL teachers to check off documentation in the students' Permanent Records.
- ESOL Teachers are required to provide regular education teachers and parents/students with the accommodations list set for each student. These are also filed in the student record file.
- TPC Meeting: ESOL teachers form a committee with at least three people to determine testing procedures for each ESOL student. The ESOL teacher must be part of the committee. The other committee members can be: regular education teacher, counselor, administrator, or parent and should be based on what classroom accommodations students receive during the year. A copy of the form is filed and one is given to the testing coordinator at each school in order for correct accommodations to be provided on state mandated tests and/or ACCESS/WIDA screener. *If the Testing Coordinator uses a different form, that form will be completed by the ESOL teacher and filed with the Coordinator. ESOL Teachers are given an overview of ACCESS and Milestones accommodations. Included in the packet is: 1. Overview 2. Participation documentation chart/letter 3. WIDA Accommodations sheets 4. Milestones accommodation sheet 5. WIDA Accommodations manual. The TC ESOL Coordinator pulls from the GADOE Assessment Guide and updates the overview and handouts each year as needed. The TC Testing Coordinator and Federal Programs Director proofs documents before it is given out to teachers. The documents are also uploaded to the Google ESOL Classroom. Each ESOL teacher has to sign off that they printed and read each section. At the January team meeting, we discuss ACCESS and any issues/concerns about testing.
- If students are deemed better served through the Special Education department (i.e. a student who is self-contained, non-verbal), then the ESOL teacher and SPED teacher will meet and form a plan of action for each nine weeks that will help student build language acquisition (if applicable). A consultative form has been created to help document meetings held between ESOL and SPED teachers.
- ESOL teachers provide regular education teachers with a copy of the Can Do charts with ACCESS scores filled in for each student in all four domains – reading, writing, listening and speaking. This chart can be used to better enable the regular education teacher a way to provide differentiation grouping and to better understand what the EL student should be able to do.
- If for any reason, a parent refuses services for an EL student, the Parent Waiver form will be completed and filed. This form must be completed and resubmitted EVERY year.

• Each year, ESOL teachers make sure that regular education teachers have the following: 5 WIDA Development standards poster (displayed), Can Do Descriptors Chart (displayed), and Can Do Booklet or link by Grade Grouping (for reference).

Q: How should we assign grades to English learners?

• A: The GaDOE does not provide school systems with guidance on grading since that is a local decision. Many EL focused websites, such as ColorínColorado.org have published resources on assigning grades and assessing ELs. It is important that teachers establish language learning and content learning goals for ELs, personalized and differentiated, and then evaluate how well students meet these goals. The WIDA English Language Development Framework, 2020 Edition is an excellent resource for developing language learning goals by grade level, content, and English language proficiency level. *Tattnall County is in progress of creating a grading policy for its district*.

List of ELP Assessments by State

WIDA Consortium States: AL, AK, CO, DE, FL, GA, HI, ID, IL, IN, KY, ME, MD, MA, MI, MN, MS, MT, NE, NH, NJ, NM, NC, ND, OK, PA, RI, SC, SD, TN, UT, VT, VA, WI, WY and Department of Defense

ELPA21 States: Arkansas, Iowa, Nebraska, Ohio, Oregon, Washington, West Virginia

ELP Assessments in other states:

- 1. Arizona AZELLA (Arizona English Language Learner Assessment)
- 2. California ELPAC (English Language Proficiency Assessments for California) https://www.elpac.org/
- 3. Kansas KELPA2 (Kansas English Language Proficiency Assessment 2)
- 4. Louisiana ELPT K-12 (English Language Proficiency Test)
- 5. Mississippi ELPT (English Language Proficiency Test CTB/LAS Links Assessment System)

6. New York – NYSESLAT (New York State English as a Second Language Achievement Test) 7. Ohio – OELPA (Ohio English Language Proficiency Assessment)

8. Texas – TELPAS (Texas English Language Proficiency Assessment System)

Section 17: Title I, Part C: Tattnall County Migrant Program

Title I, Part C – Education of Migratory Children Purpose of the Program:

The purpose of the Education of Migratory Children Program (MEP) is to provide supplemental educational services to eligible migratory children (age three to their 22nd birthday) who have not attained either a high school diploma or High School Equivalency Diploma (GED). As defined in and in accordance with the state's Service Delivery Plan, all local educational agencies (LEAs) that have identified migratory children with unmet needs are expected to implement supplemental instructional and/or support services, during the regular school year and summer months, using funds awarded directly to the LEA by the Georgia Department of Education (Department). Eligible migratory students to be served include preschool age participants (home or facility based), students enrolled in grades K-12, and students aged 16-21 not enrolled in school (out-of-school youth) and dropouts. The Department has two regional offices and employees in all parts of the state who provide support for local MEP program implementation.

Re-Sign Process:

The Georgia Migrant Education Program (MEP) cannot serve participants who are not properly identified as eligible for the program. The Database contains student information and is updated annually through our re-sign process. During the re-sign process, the Georgia MEP verifies, updates, and checks the information in the MEP Database. School district migrant staff is responsible for completing this re-sign process. School districts should not start this re-sign process prior to the district's first day of school for the students. Services to migratory students should continue during this re-sign process as long as the LEA is confident that the child did not reach end of eligibility (EOE) since the last day of school. Training on the re-sign process is mandatory for ALL direct funded LEA staff and the ABAC Consortium staff. *Tattnall County Staff is required to view the state Resign webinar. Once everyone has viewed, each SSP/Lead Recruiter will be given a portion of our allotted resign paperwork to complete in RED and return to MFOC within 10 days. For those families that the SSP cannot make contact, the Lead Recruiter and/or State Recruiter will be called in for a home visit. At Team Meeting #1, the resign process will be reviewed using the ID &R Handbook beginning on page 159. The ID&R process is explained in great detail on pages 8-91.*

Migrant students are identified through the Parent Occupational Survey (POS), which is a part of the Tattnall County student enrollment packet. This form is printed on blue copy paper for easy identification. Each registrar makes sure that the Migrant contact person at each school is given a copy of the form obtained from each student. The Migrant SSP (Student Service Provider) makes

contact with each potential migrant family to determine case-by-case needs. These blue forms are kept on file for the current year. Once a family is identified as a possible migratory family, a COE (Certificate of Eligibility) is completed and sent to the MEP office through the GaDOE Portal in order to determine eligibility. Teachers work collaboratively with the SSP if additional services are needed for migrant children and families to gain access to other education, health, nutrition, and social services. In addition to local resources, Tattnall County will coordinate with the Regional MEP staff to provide services to eligible migrant participants. If eligibility is determined, then migrant students are evaluated academically like other students in the school system to determine academic needs. If a family cannot be reached by the school SSP, Larry Smith, Lead Recruiter, will be called for a home visit. If he cannot locate family, MEP State level staff will be utilized.

Confidentiality:

The Georgia Department of Education (GaDOE) Migrant Education Program (MEP) is required to ensure that student information is secure and FERPA requirements are followed. What is FERPA? The Family Education Rights and Privacy Act of 1974 (FERPA) is a federal law which ensures the privacy of students' educational records and requires that institutions follow strict guidelines regarding the release of these records. FERPA grants students the right to access their educational records as kept by the school, the right to amend these records as necessary, the right to demand that their records only be disclosed with their permission, and the right to file complaints against a school if records are disclosed in violation of FERPA. More detailed explanation of FERPA is found on page 104 of the ID&R Handbook.

MEP District Data Access on the GaDOE Portal:

The Georgia MEP shares reports with districts through the GaDOE portal. The Migrant Data Transfer Site (MDTS) on the portal is where reports are delivered. The district is responsible for ensuring MEP staff have access to the portal for report delivery. *All SSPs, Lead Recruiter (LR), MFOC, and Federal Programs Director have access to the portal*

The Title IC Director, the Migrant Family Outreach Coordinator (MFOC), the contracted Lead Recruiter, along with the school level SSPs will follow these procedures:

- Records maintenance and transfer (MFOC, Lead Recruiter, SSPs)
- Identification and recruitment will be provided by Lead Recruiter with an as needed basis for SSPs.
- Educational support/priority of service (SSPs/Lead Recruiter/MFOC)
- Consultation with private schools (Title IC Director)
- CNA/CLIP (All migrant staff)
- Coordination of Migrant services (All migrant staff)
- Establishes a parental advisory council (PAC) (MFOC/SSPs)

- Participates in professional learning (All migrant staff)
- Provides services for the educational needs of migrant preschool children/OSY/DO (Lead Recruiter)
- Evaluates the program (All migrant staff)
- Maintains an allowable budget (We currently are under Consolidation of Funds COF) (Federal Program Director)

Monitoring of the Title I, Part C in Tattnall County Schools ensures compliance with regulations and assures the quality of the program and the instructional delivery being provided to Migrant learners. It is a process of systemically providing technical assistance and collecting data in order to provide information that can guide program implementation and monitor school improvement. Tattnall County Schools make use of monitoring to ensure that all activities are carried out in accordance with state and federal guidelines as outlined by GaDOE for Title I, Part C.

Tattnall County School System participates in the Consolidation of Funds Initiative. Tattnall County consolidates federal funds (IA, IC, IIA, IIIA, IVA, VB) with state and local funds. The Director of Consolidated Funds/Federal Programs Director is responsible for providing technical assistance to the schools, as needed, and for monitoring the expenditures to verify that the expenditures comply with the intent and purpose of each federal program in each school. Migrant parents agreed to the consolidation of migrant funds, and migrant parents are updated at each PAC meeting about additional services offered as a result of the consolidation. The Director of Consolidated Funds/Federal Programs Director maintains all documentation related to Title I, Part C funds and also conducts periodic monitoring on-site and/or through PLCs to ensure compliance with applicable program requirements. Some funds are held at the district level to cover OSY/EXITO and other necessary district level expenditures.

Use of Title I, Part C funds and program implementation at the school level is monitored through on-going technical assistance provided through the following:

- **Regularly scheduled PLCs (which meet at a minimum quarterly)**
- Emails/ Phone calls between the district, admin, and SSPs
- □ SSPs schedules (due at the beginning of the month when CERs are released or when changes occur) (Review Sheet completed by MFOC)
- Reviewing Title IC purchase orders or travel expenses submitted by the schools (Federal Program Director)
- □ Surveys conducted by teachers who supervise the SSPs in inclusion setting once per semester
- □ Classroom observations (in person) conducted by the MFOC once per semester.

SSPs and school administrators communicate directly with each other to determine the needs of migrant students. The district administrative team meets at least quarterly with school administrators to discuss school-level needs, review intent and purpose of programs, SIPs, etc. Information and guidelines/updates related to any federal program is a standard agenda item for all leadership meetings. The district Title I, Part C Director communicates with school administrators as needed through phone calls, emails, texts, and face-to-face meetings.

The Tattnall County School District will conduct three PAC meetings each year – one in August, one in January, and one in April or May. The IC Director and MFOC meet to determine the dates for the three mandatory meetings. The Pre-Meeting Checklist will be reviewed prior to each meeting by the Title IC Director, SSPs, and MFOC to prepare for the PAC meeting. Other meetings may be scheduled during the year if needed. A standing agenda is utilized for each meeting modeled after the Planning and Meeting Template provided on the MEP website. Minutes of each meeting will be taken and kept on file by the Title IC Director and MFOC to assist with program planning and identify additional needs. Each SSP/MFOC/Lead Recruiter has an assigned job(s) at each meeting to ensure the success of the meeting.

The purpose of PAC meetings is to provide an opportunity for Title IC parents to discuss progress of supplemental services, provide feedback and suggestions on these services, and help plan for additional services for Title IC children and youth. The local PAC representatives/officers and other parents are provided the opportunity to participate in regional and state PAC meetings to share programs/supports with other LEAs in the region at no cost to the representative/officer.

A survey is conducted at each meeting and the results are shared at the following PAC meeting. The President speaks/shares at each PAC meeting. PAC meetings are used to share migrant information and provide resources valuable to the migrant family unit.

PAC Timeline

June/July

• The Title IC Director and MFOC meet to determine tentative dates for the three mandatory PAC meetings and discuss possible agenda items. This is updated closer to time for each meeting.

August-September

• <u>PAC Meeting #1</u> – explain Migrant Program, elect officers for coming year, resigns, and survey given (tentative schedule of events for PAC #1) School supplies are given to each SSP to disseminate on an as needed basis to students at each school. Supplies include (but are not limited to) notebook paper, glue sticks, pencils, pens, journals, notebooks, composition books, book bags, folders, etc. Consolidation of funds is discussed.

January

• <u>PAC Meeting #2</u> – review happenings since first PAC meeting, President speaks, survey results from last meeting provided and discussed, resources provided that MFOC has found helpful (Ex: PowerSchool Parent Sign-up enrollment, hearing and vision screening for families, East Georgia Mobile Medical Lab, Telemon, Telamon, Homeless-

McKinney-Vento area resources, local library, Individual School information, testing updates for ACCESS and Georgia Milestones, and upcoming events), and survey given (tentative schedule of events for PAC #2). Consolidation of funds is discussed. Update from the PAC President concerning the first Regional and State PAC meeting.

April-May

• <u>PAC Meeting #3</u> – review happenings since PAC meeting #2, President speaks, survey results from last meeting provided and discussed, resources provided that the MFOC finds useful (Ex: Preschool registration, Telamon – Kiddie Kastle, CareOne, local library, parent tips, etc.), survey given and CNA survey given (tentative schedule of events for PAC #3). Invitations to CNA meeting will be handed out. (Recruiter will also hand deliver invites to specific people in the migrant population as to represent students, OSY, EXITO, and DO.) Those receiving invitations will sign that he/she received. Consolidation of funds is discussed. Update from the PAC President concerning the first Regional and State PAC meeting.

Parent Advisory Council Standard Agenda Tattnall County Schools

- Welcome and Introductions
- President speaks on current topics/issues
- Goal of Meeting and Review/Summary of last meeting/Survey results from last meeting
- Overview of Title I, Part C Migrant Education Program and Services and update of COF
- Update on Upcoming Events
- Update on Progress of Migrant Children and Youth on Local and/or State Assessments, Programs, and Services Provided by District (usually done at first meeting once scores are released)
- Additional Speakers/Guests (if applicable)
- Other Business
- Feedback/Suggestions from Parents provided through survey (Develop Action Steps, if necessary)

- Parent Concerns
- Light refreshments or supper provided with summary of meeting and closing remarks

The Migrant Student Information Exchange (MSIX):

The Migrant Student Information Exchange (MSIX) is a web-based portal that links states' migrant student record databases to facilitate the national exchange of migrant students' educational information among the states. The primary purpose of MSIX is to make migrant student information available to authorized school personnel to support them in making decisions on student enrollment, grade or course placement, and accrual of credits.

The timely transfer of education records for migrant children between schools has been a longstanding challenge. Migrant children often enroll in multiple schools for varying amounts of time each year as their families migrate in search of temporary or seasonal work in agriculture or fishing. MEP staffs continue to find it difficult to share and consolidate student information that schools, local educational agencies, and states collect on migrant children in a timely and meaningful way that helps school personnel make appropriate decisions when the students arrive. These conditions and those shown below prompted the need for an exchange of records.

High Movement — Highly mobile migrant student population

Short Notice — Students move from state-to-state often without notice

Lack of Data — Timely and accurate educational information not always available

Placement Errors — Students placed in incorrect courses or grades

Loss of MEP Services — Students not provided the most beneficial MEP services

In response to this challenge and a Congressional mandate to link the existing migrant student information systems, the U.S. Department of Education (ED) implemented the Migrant Student Record Exchange Initiative.

Record Exchange Initiative.

Records Transfer and the Migratory Student Information Exchange (MSIX) To minimize the impact of school interruption and change of schools on migratory children and youth, all school districts in Georgia are required to ensure the academic records of migratory children are transferred between schools and states as quickly as possible. Additionally, the U.S. Department of Education sponsors a national records transfer initiative designed to address the transfer of

student records. It is called the Migratory Student Information Exchange or MSIX. MSIX is the technology that allows States to share educational and health information on migratory children who travel from state to state and who as a result, have student records in multiple states' information systems. MSIX works in concert with the existing migratory student information systems that states currently use to manage their migratory data to fulfill its mission to ensure the appropriate enrollment, placement, and accrual of credits for migratory children nationwide. MEP funded staff use MSIX all year long. It is important that all MEP funded staff have an account. Additionally, other district staff involved with student registration and grade/course placement may request an account.

• Within 48 hours of a newly identified migratory student being identified in the district, the migratory staff must access MSIX to find any relevant information that will help the school personnel place the child in grade level, course, and/or program.

• As students move out of the district, MEP staff will submit a move notification within MSIX to allow the potential receiving school district or state to find the migratory family and continue support and services.

• As students move into the district, MEP staff will submit a move notification within MSIX to notify the sending school district or state that the child has arrived and that records are needed.

All school districts in Georgia use MSIX when addressing the needs of migratory children and youth during enrollment and class placement. More information is found on page 108 in the ID&R Handbook. *Tattnall County staff all have access to MSIX and are trained yearly on how to use it.*

Tattnall County SSPs are required to utilize MSIX for academic purposes (i.e. Test scores, grades, transcripts, etc.), move or location notices/services, and to notify other LEAs/states of a transfer student. Yearly training through a webinar is provided to each SSP. Each SSP has been given a user name and she then creates her own password upon login. The password is changed periodically throughout the year.

MSIX website: <u>https://msix.ed.gov/</u>

Immunization and Other Health Records:

Immunization and other health records must be on file at the LEA. Georgia is required to report to the Migratory Student Information Exchange (MSIX) that these records are available at the local district. This is to ensure immunization and other health records are quickly available for migratory students enrolling in schools. In order to meet, the US ED requirement for student immunization and other health records, LEAs report the immunization by adding a flag through the Migrant Participant Report (MPR) and New Participant Report (NPR). Those reports should be sent to the regional office via mail or via GaDOE portal email to the regional data specialist for MEP Database data entry updates. *SSPs must keep a record of immunization on each migrant student in his/her migrant folder housed with the SSP. Each SSP will mark the flag on the Migrant Participant Roster (4 times per year).*

Regional and State Migrant Parent Advisory Council (PAC)

Pursuant to section 1304(c)(3) of the statute, the Georgia Department of Education and local operating agencies must consult with parent advisory councils in planning and operating the MEP if they operate programs of one school year in duration. The statute also requires the MEP provide for the same parental involvement as is required in section 1118, unless extraordinary circumstances make such provision impractical. This provision requires the LEA and local operating agencies to involve parents, in an organized, ongoing, and timely way, in the planning, review, and improvement of the MEP. (See section 1118(c)(3) of the statute.) In addition, section 200.83(b) of the regulations requires the LEA to develop the comprehensive state plan in consultation with the State parent advisory council.

Tattnall County encourages the President, Vice-President and any other parents who are interested to attend the Regional and State PAC meetings. These officers invite other parents to attend. If travel is required, parents are reimbursed upon the timely completion of travel forms. Current Officers for 2021-2022 were:

- Consuela Ramon (President)
- Maria Loza (Vice President)

Elections will be held during the first PAC meeting and this will be updated if there are any changes.

The notices sent by the Georgia MEP are printed and sent to the President and Vice-President and any other migrant families that indicate an interest (from local PAC meetings). These two then share with other migrant families.

Useful Resources for Migrant Staff:

- The Georgia Migrant Parent Advisory Council (PAC) brochures and the Georgia MEP brochure provide general information for migrant parents who recently moved to Georgia. These are made available at each PAC meeting.
 - <u>https://www.gadoe.org/School-Improvement/Federal-</u>
 <u>Programs/Documents/Migrant%20Education%20Program/MEP%20English%20Brochure</u>
 <u>%20MAY%2014%202019%20FINAL.pdf</u> (English version)
 - <u>https://www.gadoe.org/School-Improvement/Federal-</u>
 <u>Programs/Documents/Migrant%20Education%20Program/MEP%20Spanish%20Brochur</u>
 <u>e%20MAY%2014%202019%20FINAL.pdf</u> (Spanish version)
 - <u>https://www.gadoe.org/School-Improvement/Federal-</u>
 <u>Programs/Documents/Migrant%20Education%20Program/FY16%20PAC%20Brochure%2</u>
 <u>0JAN%202016%20FINAL.pdf</u> (English version)
 - https://www.gadoe.org/School-Improvement/Federal Programs/Documents/Migrant%20Education%20Program/FY16%20PAC%20Brochure%2
 <u>OSPANISH%20JAN%202016.pdf</u> (Spanish version)
 - https://www.gadoe.org/School-Improvement/Federal-Programs/Documents/Migrant%20Education%20Program/FY21%20MEP%20Par ent%20Brochure--English.pdf (English version)
 - https://www.gadoe.org/School-Improvement/Federal Programs/Documents/Migrant%20Education%20Program/FY19%20MigrantEdu
 Program_Parent%20Brochure%28Span%29.pdf (Spanish version)
- LEAs may download the PAC package file in the link below for a comprehensive toolkit designed to assist districts with their local PACs -Parent Advisory Council (PAC) Planning Package:
 - <u>https://www.gadoe.org/School-Improvement/Federal-</u>
 <u>Programs/Documents/Migrant%20Education%20Program/GaDOE%20MEP%20</u>
 PAC%20package.pdf
- Georgia DOE Title I, Part C Education of Migratory Children web page:
 - <u>https://www.gadoe.org/School-Improvement/Federal-Programs/Pages/Migrant-</u> <u>Education-Program.aspx</u> (this web page provides any answer to any migrant related question or provides a place to find the answer)
- Georgia MEP Helpful links:
 - <u>https://www.gadoe.org/School-Improvement/Federal-Programs/Pages/Migrant-Education-Program-Helpful-Links.aspx</u>
- Current Georgia I D & R and Data Collections Handbook (this is required to be downloaded on each staff member's desktop for future reference and a hard copy printed):

- <u>https://www.gadoe.org/School-Improvement/Federal-</u> <u>Programs/Documents/Migrant%20Education%20Program/FY22%20IDR_Data%20</u> <u>Collections%20Handbook%20FINAL%20AUG%209%202021.pdf</u>
- GA MEP Forms and Documents:
 - <u>https://www.gadoe.org/School-Improvement/Federal-Programs/Pages/Gamep-Forms-and-Documents.aspx</u>

Georgia DOE Migrant Contact Information (Atlanta level):

- Margarita Munoz Program Manager Migrant Education and Refugee Programs Cell: 404-272-8762 Email: <u>mmunoz@doe.k12.ga.us</u>
- o Iliana Garcia-Acevedo (State Data Specialist) <u>igarcia@doe.k12.ga.us</u>
- Yesica Ordonez (State Data Coordinator)
 - 404.416.2909 (Phone)
 - yordonez@doe.k12.ga.us (Email)
- Georgia DOE Migrant Staff Contact Information (RESA level):

 Region 1
 - Cindell Mathis (Coordinator) <u>Cindell.mathis@doe.k12.ga.us</u>
 - Bernardo Sanchez-Vesga (State ID&R) <u>bsanchez@doe.k12.ga.us</u>
 - Sandra Morales (Recruiter) <u>smorales@doe.k12.ga.us</u>
 - Jorge Araque (Recruiter) jaraque@doe.k12.ga.us
 - Rose McKeehan Ext 10 (Data Specialists) <u>rmckeehan@doe.k12.ga.us</u>
 - Chasity Britt (Resource Specialist) <u>Chasity.Britt@doe.k12.ga.us</u>

The MFOC maintains a yearly notebook with documentation from each school/SSP/Lead Recruiter. It is housed at Tattnall County High School where the MFOC is also located. The Migrant Documentation Notebook(s) contain the following files:

- Resigns these are done in August
- Parent Occupational Surveys (Yes Only) blue copy paper
- Current Enrollment Roster (CER) by the month each SSP checks school and sends to MFOC to be sent to MEP office
- PAC Meeting Handouts/Paperwork/Survey Results/Minutes
- College Experiences TC attends at least 1 per year (plus speakers who are asked to come in) currently these are held virtually
- Nine Weeks Not Served Directly Letter (signed by regular education teacher)
- Nine Week's Grade Report for subjects served
- SSP Schedules sent to MFOC who completes a Schedule review schedule should show students who did not "pass" state test and those who need help academically
- Staff Training documentation/chart in place of PDNow
- New Certificates of Eligibility (COEs)
- Current School Calendar

- Current ID&R plan MFOC completes in June/July copy is given to SSPs at first team meeting and discussed in great detail and updates are made as needed
- Current IPS/Evaluations TC will no longer submit IPs (COF) but we do write them for our own documentrarion purposes.
- Non Eligible student/family
- PFS List signed off that teachers/admin received copy
- Approved PFS forms (Copy) green PFS forms are directly sent to MEP office and copy sent to MFOC. MFOC will send original to SSP once it is approved and place copy in notebook.
- Observation Forms MEP will no longer complete onsite observations (COF) TC will complete their own observations; two face to face by MFOC and anonymous teacher surveys (those who have an SSP in their class). These are both done once per semester.
- IP monitoring are only required for EXITO, DO, and OSY. (COF) However, we still complete IPs for K-12 for our own documentation purposes.
- Departure Forms/ Information Change forms golden rod copy paper sent to MFOC to be sent to MEP thru the GaDOE Portal.
- SSL Tracking form TC no longer collects tracking form (COF) for turn in to MEP but we keep them for local documentation.
- Immunization done once in September and checked on current MPR then only for new eligible students remainder of year
- Checklist of Activities for SSPs/MFOC this is kept on a monthly basis and initialed as completed each month. Final copy is turned in at the end of year to MFOC.
- Parent Info sent home any information sent to parents during the year (Regional/State PAC meetings, Telamon letters, montly parent communication, etc.)
- New Migrant Participation Roster –signed by SSP and copy sent to MFOC
- Summer Camp Information copy of letters sent home with 8th 12th grade students. List of attendees is filed.
- Time Log SSPs/ Lead Recruiter
- Extra Tutoring Services if provided
- EOE List/Letters completed on monthly basis. MFOC mails letters home. Copy sent to SSPs
- Quality Control
- End of year data pre/post scores, EXITO, OSY/DO, Milestones, ACCESS (if ESOL), retention, and Credit Recovery. Pre/Post scores for elementary and middle will use iReady. High School will use Lexile scores.
- Any pertinent information needed for documentation emails, receipts, brochures, letters, etc.
- Copies of Digital Map of Tattnall County with farms/barracks marked
- Letters sent to local farmers (with responses)
- Resources list given out at PAC meetings, copy in each school's front office, and copy left at barracks
- List of crops/seasons for Tattnall County
- Acceptance letter MFOC mails and sends copy to SSP to file.
- Please note: Everything is sent in English and Spanish when feasible.

Tattnall County Lead Recruiter has his own notebook containing the following:

- Certificate of Eligibility (COEs) for OSY/DO
- Priority for Service (PFSs) for OSY/DO
- OSY/DO Profile
- Documentation of EXITO and OSY/DO visits Pre/Post tests

Tattnall County Lead Recruiter has a notebook of plans for OSY/DO/Exito that can be pulled for lessons on as needed basis. These lessons are pulled from GOSOSY. He provides each OSY with a health book pack kit. LR provides work kit for EXITO students that help with basic reading and math skills. LR trains parents on how to use what is in the kit. COVID has limited in person house visits recently.

Tattnall County conducts three Migrant Team Meetings throughout the school year: August, January, and April/May. These meetings are used to discuss any issues or concerns, update on new information, and review policies and procedures. Copies of agenda, sign in, and handouts are placed in notebook. SSPs/Migrant Staff attend Professional Development at the school level as well as the district level. They also attend any regional and state required meetings/webinars. SSPs are required to document all PD. They are not required to complete PDNow under COF policy, but do have access to this if interested.

Tattnall County currently does not hold migrant summer school, but does provide services. Such services are:

- Credit Recovery (for High School students)
- **Regular Summer School** for students who meet criteria
- Summer Remediation Packets Elementary and Middle school SSPs/Regular Education teachers choose migrant students who would benefit from an instructional packet. The criteria are students who are failing or fall in the low 70 range in ELA or Math for the year AND/OR students who did not do well on the statewide test (and did not receive an invite for regular summer school). The focus is English Language Arts and Math. SSPs gather activities, worksheets, and technology ideas for the students to complete or work on during the summer months. The packets are given to students on the last week of school and the SSP explains its purpose. The SSPs also notify parents the packet is coming home. A list is compiled with addresses and phone numbers. The Lead Recruiter will meet with the students during the summer to check on progress and to help as needed. The packets will be turned in the first week of school and a reward will be given for completion (PRIDE tickets, snacks, etc.)
- Students in grades 8 12, are given information about **summer camps**. Parents are contacted and encouraged to send their children who fall into the age range.

Tattnall County SSPs, MFOC and Lead Recruiter attend two training sessions provided by the MEP office thru webinars. These are held in August and April. Webinars are also viewed on an as-needed basis. SSPs are required to attend PLCs at the school level and three county wide team meetings – on matters that help them better serve their students. SSPs and MFOC keep a running list of any Professional Development. This replaces the hours from PDNow (COF). SSPs can complete any PDNows that are of interest to them.

Tattnall County utilizes Google to conduct 2 anonymous surveys on the effectiveness of the SSPs in the classroom; one conducted each semester by the regular education teachers. This survey is sent to any regular education teacher of a migrant student in the system who works with an SSP. The results are used to better prepare for the next semester or for the following year.

SSPs, Lead Recruiter, MFOC, Migrant students, and Migrant parents are encouraged to complete a survey given at the end of the year. The results are used for the CNA meeting held in the summer. MFOC, Lead Recruiter, SSPs, migrant students and migrant parents are invited to attend the CNA meeting to help plan for the following year and who represent OSY, DO, EXITO and PreK-12 students.

MFOC and SSPs have read-only access to PowerSchool and are able to check grades on a weekly basis. This enables them to discuss with regular education teachers what can be done to help migrant students in ANY subject area.

Extra tutoring (afterschool, during school tutoring, lunch, Saturdays, exploratory time) can be given to Migrant students who need extra practice. With COF, Tattnall County is better able to provide this. A list of migrant students who utilize this is maintained at the school level and with the Federal Program Director.

This year, the MFOC will create a Google Classroom for all staff to have access. It will house all handbooks, all forms, resources, and any other information needed to be shared and used throughout the year.

During the first team meeting, the ID&R Handbook, the Migrant Handbook, and the TC Handbook will be reviewed. After the migrant staff has read them completely, each person will sign off stating that this has been completed. This will be done using Google Docs.

Section 18: Title V, Part B Rural Education Initiative

Tattnall County consolidates 100% of Title V, Part B funds

Purpose

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

Small, Rural School Achievement (SRSA)

The SRSA program provides local educational agencies (LEAs) with greater flexibility in using the formula grant funds that they receive under certain state-administered federal programs. The U.S. Department of Education (US ED) calculates the SRSA grant allocations for an eligible LEA on the basis of a statutory formula and makes the SRSA grant allocations directly to the eligible LEAs. SRSA funds do not flow through the Georgia Department of Education (Department). It also authorizes formula grant awards directly to these LEAs for a wide range of local activities that support student achievement. The SRSA program provides flexibility to eligible, rural LEAs to use specific federal formula funds to support local activities under Title I, Part A, Title II, Part A, Title III, Title IV, Part A and /or Title IV, Part B to assist them in addressing local academic needs more effectively. To be eligible to participate in the SRSA grant, an LEA must:

- □ Have a total average daily attendance (ADA) of fewer than 600 students, or serve only schools that are located in counties that have a population density of fewer than 10 persons per square mile.
- □ Serve all of the schools served by the local educational agency are designated with a locale code of 41, 42, or 43, as determined by the Secretary of Education.

Rural and Low-Income Schools Program (RLIS)

The RLIS program is an initiative that provides grant funds to rural LEAs that serve concentrations of children from low-income families. An LEA is eligible to receive funds under the RLIS program if:

- □ 20-percent or more of the children age 5 to 17 served by the LEA are from families with incomes below the poverty line.
- □ All schools served by the LEA have a school locale code of 32, 33, 41, 42, or 43, as determined by the Secretary of Education.

Eligible systems apply for the RLIS funds through the consolidated application.

Use of Funds

An eligible LEA may use RLIS funds for:

- □ Activities authorized under Title I, Part A.
- □ Activities authorized under Title II, Part A.
- □ Activities authorized under Title III.
- □ Activities authorized under Title IV, Part A.
- □ Parental involvement activities.

Carryover Funds

Eligible LEAs may obligate Title V, Part B funds during the federal fiscal year for which the funds were appropriated and during the succeeding federal fiscal year.

The Tydings period gives the eligible LEAs 27 months to obligate their funds 2 C.F.R. Part 200 – Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards under (Education Department General Administrative Regulations [EDGAR] at 34 C.F.R. 76.709 [b]), (Rural Education Achievement Program [REAP] Guidance, 6/13/03, III C-8). It is the expectation of the US ED that Title V, Part A, REI funding be expended during the year in which it is allocated.

While there are no provisions for the reallocation of Title V, Part B funds, LEAs with carryover funds in excess of 25-percent of their allocation will be monitored. Technical assistance will be provided to LEAs with an excessive amount of carryover funds.

Choice of Participation

If an LEA is eligible for funding under both RLIS and SRSA, such LEA may receive funds under either RLIS or SRSA for a fiscal year, but may not receive funds under both RLIS or SRSA. An LEA eligible for funding under both this subpart and subpart 1 shall notify the Secretary and the SEA under which of such subparts the local educational agency intends to receive funds for a fiscal year by a date that is established by the Secretary for the notification.

Accountability

Each year an LEA receives a grant under the SRSA program or receives a grant under the RLIS program, the LEA must administer an assessment that is consistent with the assessment requirements in Section 1111 of the Every Student Succeeds Act (ESSA). The Department encourages LEAs to use these RLIS and SRSA funds for needs identified under Georgia's Comprehensive Needs Assessment (CNA). The Tattnall County School District consolidates all Title V funding with state, local, and other federal funds and meets the intent and purpose of Title V, Part B. The Annual Evaluation Report is submitted by the Title V, Part B Director in accordance with the program requirements. The expenditures are provided by the Director of Consolidated Funds once completion reports are finalized with expenditures to verify intent and purpose. The Title V Director enters the information through the consolidated application.

Section 19: CARES/ESSER Federal Funds

As a result of the pandemic, federal funds were released to schools. Tattnall County has received the following federal grants:

FY20 CARES 1 - CARES Act \$1,284,221

FY21 CARES ACT II - ESSER - Elementary and Secondary School Emergency Relief Fund - \$5,348,354

FY21 CARES III - ESSER III ARP - American Rescue Plan - \$12,020,295

FY21 CARES Nursing Grant - ESSER CARES ACT SA Reserve School Nursing Grant - States reserves school nursing \$15,000

FY21 ESSER CARES – IDEA Supplemental \$6,681

FY21 ESSER ARP LEA Educator Bonus Grant \$542,646

FY21 ESSER ARP-HCY I Homeless Children and Youth \$29,996

FY21 ESSER ARP-HCY II Homeless Children and Youth \$31,843

Any materials or equipment purchased under these grants are subject to federal inventory monitoring guidelines. Any salaries paid by these grants will require a periodic certification to be completed twice a year.

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.

CARES funds ARE NOT consolidated.

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.

If applicable.

Use of ESSER funds for minor or major construction projects

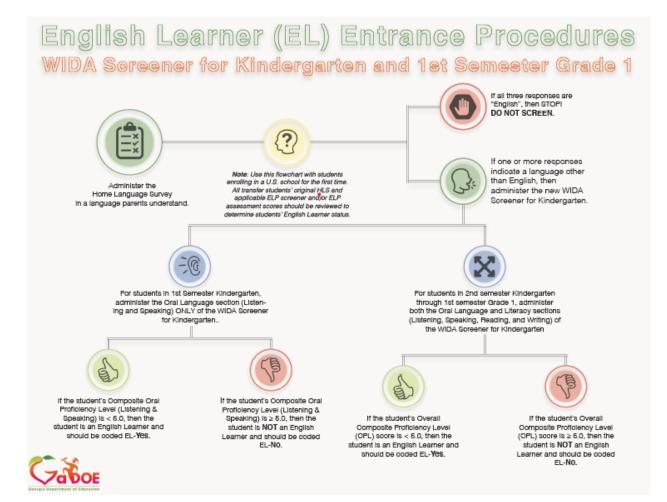
The Tattnall County School District will ensure that school facility repairs and improvements are solely to reduce the risk of virus transmission and exposure to environmental health hazards, and to support student health needs and inspection, testing, maintenance, repair, replacement, and upgrade projects to improve the indoor air quality in school facilities, including mechanical and non-mechanical heating, ventilation, and air condition systems, filtering, purification, and other air cleaning, fans, control systems, and window and door repair and replacement.

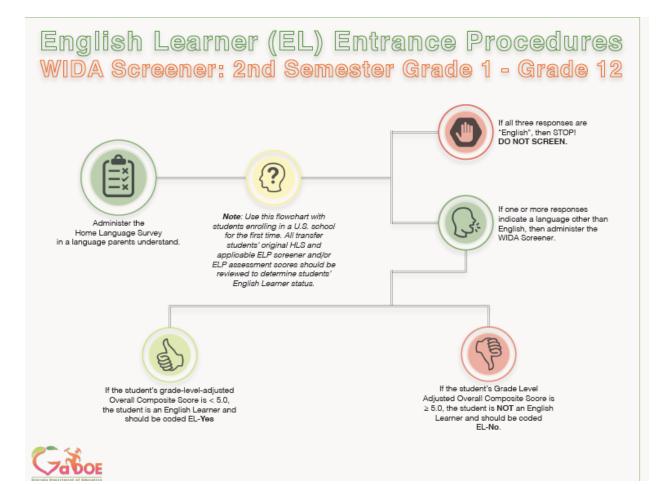
The Tattnall County School District will ensure the required documentation is on file with GaDOE Facilities once all steps are completed for approval of projects by the ESSER Grants Team.

- Submit all required documentation complying with state law regarding Public Works Construction Projects. O.C.G.A. 36-91-20, 36-91-21, and 36-91- 22
- Revise or withdraw any state capital outlay funded projects where ESSER funding was utilized.
- Verify that the construction project will be completed by the end of the grant period

- Submit required documentation adhering to the Davis Bacon Wage Requirement for all federal contracts and subcontract over \$2,000 for construction, alterations, repairs, painting, and decorating.
- Submit applicable required documents that follow federal construction regulations. 34 CFR75.600-617

Appendix





English Learner (EL) Exit Procedures Grades 1-12



Administer the ACCESS for ELLs 2.0.



If the Overall Composite Proficiency Level (CPL) is < 4.3, then the student is still an English Learner and remains coded EL-Yes.



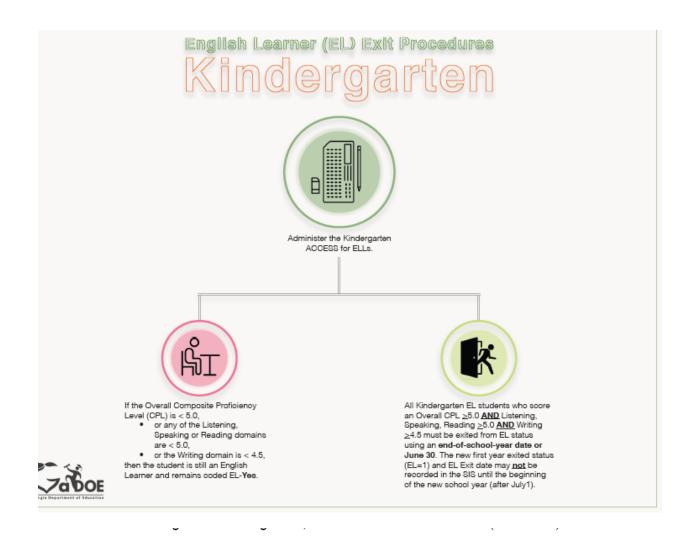


LEA Flexibility:

An LEA that chooses to consider possible EL Exit for students scoring between CPL 4.3 – 4.9 must establish written standardized LEA EL Exit Procedures that include an EL Reclassification Review Team decision to exit or not to exit. The LEA's procedures must be implemented consistently in an objective manner and must be applied in a valid and reliable way. LEAs must use the state-provided EL Reclassification Form.



If the Overall Composite Proficiency Level (CPL) is ≥ 5.0 then the student is **no longer** an English Learner, must be exited from EL status, and must be coded EL-1 after July 1st.



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