

**Richmond County School System**

**2017-2018**

**Title I Procedures Manual**

**Mrs. Angeline Andrews-Milton, Title I Director**



*The Mission of the Richmond County School System is to build a world-class school system through education, collaboration, and innovation*

**Vision Statement**

*The Richmond County School System will create a world-class, globally competitive school system where all students will graduate and are college/career ready.*

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## **Purpose of This Handbook**

The purpose of this standard operations procedures handbook is to provide a step-by-step, systematic approach to managing the rules and guidelines of Title I, Part A to ensure consistent compliance in Richmond County School District. The information provided may be used by staff to ensure that all federal programs are being implemented accurately and effectively.

The step-by-step approach contained in this handbook will promote uniformity in operations as the federal programs in the district seeks to carry out official duties and responsibilities. The Georgia Department of Education (GaDOE) provides Local Educational Agencies (LEAs) extensive guidance on the over-arching requirements for Title I, Part A via the on-site monitoring document used to ensure that LEAs are meeting all statutory requirements of federal programs. The over-arching requirements from the GaDOE document were used to create this handbook. Step-by-step procedures, local and state Board policies, and checklists are all included in this guide.

## **1. LEA MONITORING OF SCHOOLS AND PROGRAMS**

### **1.1c. Written description of the LEA monitoring process, including on-site procedures, timelines, schedules, data review, and the reporting and corrective action processes.**

Monitoring is an essential component of ensuring that all facets of the Title I program are being implemented as prescribed by the Every Student Succeed Act. It is a process of systematically providing technical assistance and collecting data in order to provide information that can guide program implementation.

The Local Educational Agencies (LEAs) has designed a continuous monitoring process that involves federal and nonfederal programs working with schools to review data, update plans, align budgets, school observations monitor expenditures. Once budgets are approved, program specialists track how well LEAs are requesting funds for expenditures to ensure that LEAs are likely to meet the expenditure requirements.

#### **Monitoring**

- The Title I Director and other Federal Program Directors will undergo trainings from the Georgia Department of Education (GaDOE) and other sources to maintain proficiency in federal program compliance.
- The Local Education Agency (LEA)/Title I Director/Special Education Director /Title II Director and Student Services, Title III, and Immigrant. The LEA will conduct self-monitoring and provide technical assistance to schools and programs sufficient to ensure compliance with Title Program requirements, including Title I, Part A, Title II, Part A, Title I, Part C &D, Neglected and Delinquent, Title X, Part C/McKinney-Vento Act, Title III, Part A, Title IV, Part A, School Improvement and IDEA.
- The Local Educational Agencies (LEAs) must submit for approval an annual budget through the Consolidated Application process. Title I, Part A, Title I, Part D, Title II, Part A, Neglected and Delinquent and McKinney-Vento Education Program Specialists review each application and budget to ensure that expenditures are appropriate for the program area before approving LEA budgets. Once budgets are approved, program specialists track how well LEAs are requesting funds for expenditures to ensure that LEAs are likely to meet the expenditure requirements.

#### **Single Audit**

- The Title I Director will maintain all documentation in the Title I Department which is available for future auditing/monitoring according to the LEA Monitoring Form, which is issued annually by GaDOE.

## **On Site Monitoring**

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

- On-site Monitoring – An SEA on-site Cross-Functional Monitoring Team visits a LEA to apply the criteria included in the LEA Monitoring Form.
- Selection of LEAs to be monitored.
- LEAs are monitored on a four-year cycle. The LEA/Title I Director will participate in training and technical assistance updates as provided by GaDOE prior to the monitoring visit.
- LEAs are initially randomly selected from each of Georgia's ten service areas.
- LEAs with audit or monitoring findings requiring a return of monies, or receiving a high number of complaints from parents and other stakeholders are monitored within the year of the LEA audit or monitoring report and the written complaint. In addition, on-site monitoring outside of the scheduled cycle may be arranged as needed if an LEA evidences serious or chronic compliance problems. GaDOE Education Program Specialists must follow the Division protocol when conducting an on-site monitoring of an LEA. A copy of all documentation is maintained with the SEA.
- After the on-site monitoring visit, the LEA 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 LEA/Title I Director will respond in a timely manner with a corrective action plan which must be approved by GaDOE. Implementation of the Corrective Action Plan will be monitored by the appropriate Education Program Specialist. Monitoring is an essential component of ensuring that all facets of federal programs are being implemented as prescribed by ESSA. It is a process of systematically providing technical assistance and collecting data in order to provide information that can guide program implementation.

## **Desktop Monitoring**

LEAs not receiving an on-site visit are required to submit required documents to the GaDOE portal.

District monitoring addresses the following:

- Ensuring that all federal program activities are carried out in accordance to federal compliance guidelines
- Equipment usage monitoring
- Academic monitoring

- Budgetary monitoring: The ESSA(Every Student Succeed Act) requires the State Educational Agency (SEA) to monitor the implementation of program requirements and the expenditure of federal funds.

District monitoring addresses:

- Schoolwide and Targeted Assistance Programs
- School Improvement/Schoolwide/Targeted Assistance Plans
- Inventory
- Homeless Program
- Neglected and Diligent Program
- Private School
- ELP (Extended Learning Programs)

**Schoolwide/Targeted Assistance Programs**  
**(Plans are located on shelf in Title I Classroom)**

The LEA has designed an approach that involves Title I Director, Program Specialists, and a System School Effectiveness Specialist to assist Title I schools. LEA federal programs make use of monthly monitoring as a means of regular observations and recording of activities taking place in Title I schools. Members of the LEA attend assigned School Leadership Team meetings, Content Area Meetings, Extended Learning Programs, and Professional Learning Meetings. All Title I schools are subjected to on-going monitoring by the LEA throughout the school year.

In June, following the GA DOE Federal Program Conference, the Title 1 Schools are updated on any new guidelines.

The Title I Director conducts webinars with Principals, Parent Facilitators, Academic Support Specialists, and Leadership Team members for each of the Title I Schools. These trainings consist of trainings on policies/procedures, Title I program operational guidance, and Parent and Family Engagement requirements/compliance and the Federal Programs Handbook. The Title I Director provide schools with timelines, budget forms, inventory information, schoolwide/ targeted assistance implementation, Intra-district transfers, parent and family engagement, fraud policy and other areas of federal programs as needed. During these summer meeting/trainings the Title I Director, also includes discussions on the chart of accounts, the budgeting process, and the correlation of the budget and Title I SWP/SIP/TA. Additional guidance is provided to schools new to Title 1 and schools considered as Priority, Focus and/or Opportunity.

Title I principals and office managers are provided Title I packets with a table of contents, which contains a list of items required to be submitted both by hard copy (signed, if appropriate) and electronically and the dates the items are due. Each item is discussed and principals have the opportunity to ask questions, provide feedback, or gain more information about the requirements. Items are maintained in folders by school. The files are monitored throughout the year. The schools are required to maintain copies of original documents in their Title I notebooks. All timelines and required documents are placed on the Title I website for easy access.

The Title I Department's Bookkeeper, Director, and assigned Program Specialists meet with the School Level Bookkeepers to ensure understanding of how to monitor various budgets (Part A, SIP, Parent and Family Engagement, etc). They are given a notebook and guidelines that include deadlines and submission procedures for orders, travel, professional learning, and consultants. In addition, processes and procedures can be found on the District's Title I webpage.

Quarterly payroll and budget status reports are reviewed and principals are contacted immediately to resolve variances. Title I personnel are required to acknowledge degree upgrades so that budgets will reflect additional expense.

### **Monitoring**

The Title I (LEA) department conducts ongoing monitoring of all required documents. A timeline is provided to principals at the initial administrators meeting. The form includes requested documents, a due date, and dates when documents are submitted to Title I. The documents are collected and placed in an identified Federal Programs Monitoring binder, which is located in the Title I office. The Program Specialist provides technical assistance to each principal and or designee to ensure that the documents are being collected in a timely fashion to ensure that all deadlines are met.

On-site monitoring/observations of all schools are conducted throughout the year beginning with schools designated as priority, focus and opportunity, through an observation tool, ELEOT (Effective Learning Environments Observation Tool). All district employees are assigned to conduct walkthroughs with a team at various schools. Teams consist of Title I Program Specialists and Coordinator, Director of Curriculum and Instruction, Curriculum Coordinators and Program Specialists, Professional Learning Director, Title I Director, Accountability Team, Special Education Director and other central office staff. Other opportunities for observation and feedback occur through staff meetings, emails and phone conversations throughout the year.

### **Professional Learning**

Parent Facilitators/Designees and the Family Service Facilitators receive professional learnings on how to build capacity to effectively implement each school's parent and family engagement program. Instructional Coaches, Academic Support Specialist, Paraprofessionals, Title I Teachers and Literacy Paraprofessionals receive professional learning to guide and support them in determining the best rESSArch based instructional strategies that meets individual school needs. These trainings are routinely during the school year to ensure best practices, data, and federal guidelines are being followed as they offer services to parents, teachers, and students.

The Program Specialists assist schools in developing their budgets to make sure that the funds are being used to implement an effective Title I program aligned to the school's comprehensive needs assessment and Parent and Family Engagement plan. Program Specialists provide schools with technical assistance to analyze and revise the school's budget to make sure that the resources are allowable and allocated effectively. Title I Program Specialists communicate and monitor feedback through formal and informal meetings as well as phone calls and e-mails. E-mail invitations often serve as a calendar reminder for item due dates and scheduled meetings.

### **School Improvement Plans/School-wide Plans/Targeted Assistance Plans**

Each school is responsible for creating a planning committee, conducting a comprehensive needs assessment, identifying specific goals and strategies that target their need. The School Improvement Plan is reviewed annually for its effectiveness. Schools are tiered based on CCRPI and plans are developed to include specifics on academic achievement, operational effectiveness, and community engagement. Schools that are federally identified are given specific requirements to include in their plans.

Developing the school improvement plan and monitoring progress is a continuous plan. The LEA provides schools with technical assistance to create the school improvement plan. Program Specialists support schools in developing, revising, implementing target assistance and school improvement plans by working collaboratively with school's Leadership Teams at individual schools. Meetings are conducted that focus on data analysis to identify needs of improvement and to collaboratively agree on a plan of action. The leadership team actively seeks scientifically research based instructional supplemental materials and resources to support the core academic curriculum to ensure success for all students.

The Accountability Department collaborates with all supporting LEA Departments to provide a calendar/outline of the training, feedback, and monitoring that occurs throughout the year. School level plans are presented by principals during the fall and mid-year to the superintendent, area superintendents and central office staff. Plans are revised as necessary.

The LEA provides several technical assistance workshops on creating school improvement plans. Schools are tiered based on CCRPI and plans are developed to include specifics on academic achievement, operational effectiveness, and community engagement. Schools that are federally identified are given specific requirements to include in their plans.

There are three meetings held in regard to the school improvement plans. This occurs after the initial, beginning of the year Title I meeting, in which all components of the program are discussed. These meetings are held with individual school personnel, Executive Directors, Program Specialist, and the Professional Learning Director to name a few.

The LEA provides Program Specialists to support schools in developing, revising, implementing and coordinating target assistance and school improvement plans as a part of the Leadership Team Meetings at individual schools. In these meetings, the data is analyzed to identify problems and discuss solutions to the identified problems. The leadership team actively seeks scientifically research based instructional supplemental materials and resources to support the core academic curriculum to ensure success for all students. The Program Specialists and the Parent Facilitators also provide assistance in implementing requirements for parent and family engagement. Professional Learning is a system effort with the support of the Title I Department. Professional

Learning is provided for the Parent Facilitators, Instructional Coaches, and the Intervention Specialists to equip them to assist in their schools in Parent and Family Engagement and the development of instructional strategies.

The Program Specialists assist schools in developing their budgets to make sure that the funds are being used to develop instructional strategies, implementing requirements for parent and family engagement, identifying effective professional learning, and analyzing and revising the school's budget to make sure that the resources are allocated effectively. The budgets are checked and if something on the budget is not allowable or is not aligned to their school improvement plan, it is returned to the school and assistance is offered.

The Title I Director and Director of Curriculum and Instruction conduct on-site monitoring of all schools a minimum of three times per year for compliance. The first visit takes place in the fall, the second in winter, and the third in spring. Feedback is provided to the principals via checklists and descriptive information. In addition, emails, staff meetings, and phone conversations take place throughout the year as a means of providing on-going monitoring and communication with each Title I school.

#### Timeline for Monitoring of Title I Schools

##### **June-July**

Provide Summer Workshop for Principals of all Title 1 Schools following the Federal Programs Conference in June to update them on any new guidelines and to provide guidance for "new" Title 1 principals. Workshops will include but not limited to the following topics:

Technical assistance include but not limited to the following topics:

- Reviewing and monitoring the Title I Schoolwide/Targeted Assistance/School Improvement Plan.
- Ensuring that all federal programs activities are carried out in accordance to federal compliance guidelines
- Equipment usage monitoring
- Academic Activities
- Budgets
- Ordering
- Compliance Issues
- Parent and Family Engagement
- Monitoring
- Multiple Criteria Selection/ Models
- Academic Achievement
- Teachers/Paraprofessionals Scheduling
- Ethics/ Fraud/ Waste/Compliance
- McKinney-Vento
- Neglected and Delinquent Program
- Inventory

• Programmatic and Financial

Month	Activities	Person Responsible
<b>July</b>	<ul style="list-style-type: none"> <li>• Using CCRPI information and all data sources to determine each school's needs</li> <li>• All departments submit final revisions of CLIP to consolidated application by July 15</li> <li>• CLIP due to GaDOE by July 31</li> </ul>	
<b><u>August</u></b>	<ul style="list-style-type: none"> <li>• Submit names and daily schedules of Title I Paid Employees</li> <li>• Annual Title I Meeting Window Begins</li> <li>• Schools submit a copy of "Parent's Right to Know" letter</li> <li>• Post on school's website and send Parent's Right to Know, and Complaint Procedure to the parents and Title I Office.</li> <li>• Submit Dissemination Checklist: Parents Right to Know and Complaint Procedure</li> <li>• Submit Principal Attestations and Assurances Form to Title II</li> <li>• Notify parents of the hours of operations of the Parent Resource Room</li> <li>• HiQ Superintendent Sign-off---Aug. 31</li> </ul>	
<b><u>September</u></b>	<ul style="list-style-type: none"> <li>• August Monthly Signed Class Schedules-Split-Funded Personnel Due</li> </ul>	

	<ul style="list-style-type: none"> <li>• August Monthly Signed Time and Effort sheets due</li> <li>• Schools submit the Title I Schoolwide Plan for review/approval</li> <li>• Onsite review of federal programs inventory and Title I SWP/SIP/TA</li> <li>• Migrant Budget due Sept. 15</li> </ul>	
<b><u>October</u></b>	<ul style="list-style-type: none"> <li>• Title I, Part A; Title II, Part A budgets due in Consolidated Application—Oct. 1 Title II Attestation Forms due—Oct. 1</li> <li>• September Monthly Signed Class Schedules-Split-Funded Personnel Due</li> <li>• September Monthly Signed Time and Effort sheets due</li> <li>• Copies of Parent and Family Engagement Plans placed in Parent Resource Centers</li> <li>• Submit Annual Title I Meeting documents ( after school meeting)</li> <li>• Deadline for Annual Title I Meeting( Oct. 31)</li> <li>• School Parent and Family Engagement Plans due for review/approval</li> <li>• Parent and family engagement Plans, Deadline</li> <li>• School Parent Compact Due with checklist</li> <li>• Submit a copy of the School Parent Compact Dissemination Form</li> <li>• Distribution of Parent and Family Engagement Plans/Post on School's Website</li> <li>• Submit Parent and Family Engagement Plan Distribution Assurance Form Submit</li> </ul>	

	<p>samples (10%) of complete School-Parent Compacts per grade level</p> <ul style="list-style-type: none"> <li>• Deadline to notify parents of the location of the Title I Schoolwide Plan</li> <li>• Deadline to notify parents of the location of the Parent Resource Center</li> <li>• Deadline for all parent documents to be posted on Parent and family engagement section of school web page ( compacts, Parent and family engagement Plans, Parent Right to Know, Title I Schoolwide Plan, Completion Reports for all Federal Programs Title VI, Part B Annual Report</li> </ul>	
<b><u>November</u></b>	<ul style="list-style-type: none"> <li>• October Monthly Signed Class Schedules-Split-Funded Personnel Due</li> <li>• October Monthly Signed Time and Effort sheets due • Six Requirements to Build Capacity Forms</li> </ul>	
<b><u>December</u></b>	<p>Submit November Monthly Signed Class Schedules-Split-Funded Personnel Submit November Monthly Signed Time and Effort sheets</p>	
<b><u>January</u></b>	<ul style="list-style-type: none"> <li>• Submit December Monthly Signed Class Schedules-Split-Funded Personnel Due</li> <li>• December Monthly Signed Time and Effort sheets due</li> <li>• Periodic Certification for all Personnel Fully Funded (100%) by Title I and Title II Due</li> <li>• Onsite review of federal</li> </ul>	

	programs inventory and Title I Schoolwide Plans	
<b><u>February</u></b>	<ul style="list-style-type: none"> <li>• Submit January Monthly Signed Class Schedules-Split-Funded Personnel</li> <li>• Submit January Monthly Signed Time and Effort sheets</li> </ul>	
<b><u>March</u></b>	<ul style="list-style-type: none"> <li>• Submit February Monthly Signed Class Schedules-Split-Funded Personnel</li> <li>• Submit February Monthly Signed Time and Effort sheets</li> <li>• Stakeholder survey opens for Title I and Title II</li> </ul>	
<b><u>April</u></b>	<ul style="list-style-type: none"> <li>• Submit March Monthly Signed Class Schedules-Split-Funded Personnel</li> <li>• March Monthly Signed Time and Effort sheets due</li> <li>• Summary of Title I stakeholder survey due</li> <li>• Begin review/revisions of Title I Parent and family engagement , Title I Schoolwide Plans, and School- Parent Compacts</li> <li>• Stakeholder survey for Title I and Title II closes</li> </ul>	
<b><u>May</u></b>	<ul style="list-style-type: none"> <li>• April Monthly Signed Class Schedules-Split-Funded Personnel Due</li> <li>• April Monthly Signed Time and Effort sheets due</li> <li>• Spring Title I Input meeting</li> <li>• Deadline for Spring Title I Input meeting documents ( revision of compacts for FY19, revision of Parent and family engagement Plans , FY19 1% of Parent and family engagement Budget input</li> <li>• Submit End of the Year Parent Coordinator Evaluation</li> <li>• Final Budget Amendment for</li> </ul>	

	<p>Title VI, Part B</p> <ul style="list-style-type: none"> <li>• District meeting to revise district parent and family engagement policy and plan.</li> </ul>	
<b><u>June</u></b>	<ul style="list-style-type: none"> <li>• May Monthly Signed Class Schedules-Split-Funded Personnel Due</li> <li>• May Monthly Signed Time and Effort sheets due</li> <li>• Periodic Certification for all Personnel Fully Funded (100%) by Title I Due</li> <li>• Onsite review of federal programs inventory and Title I Schoolwide Plans</li> <li>• HiQ closes and Principal Sign-off –June 30 Ongoing Throughout School Year</li> <li>• Work with principals on annual revision of plans .The Federal Programs Director and Assistant Superintendent of Curriculum and Instruction review the plans and the budgets to insure that funds are being spent according to the plan and the plan has all the necessary components</li> </ul> <p>•• Monthly meeting with Principals. Additional training as needed.</p>	

**Inventory all items purchased by Federal Programs**

All schools are required to maintain an active inventory of all items purchased with federal funds. All regular federal program items are marked with a label which has the fiscal year and program. The label is placed on the equipment in a location easy to see. The Technology Program Specialist conducts inventory annually for all Title I schools. Additional information about services for homeless children and youth is located in section 3.

### **Homeless and N&D (Taking A Step Beyond & LightHouse Care Center of Augusta programs are monitored by the State Grant Manager**

Technical assistance is provided to the N&D programs( Taking A Step Beyond & Lighthouse Care Center of Augusta) and the Homeless (McKinney Vento Grant) by the Program Specialist and the homeless liaison monthly to ensure that all federal guidelines are being adhered to and followed.

Budgets and purchase orders are reviewed monthly by the Title I Director to assist schools in spending the funds as planned. Additional information about services for homeless children and youth is located in section 12 and 14.

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

A face-to-face meeting is held during the summer with the Neglected and Delinquent Facilities headmaster to discuss the federal requirements of the program. There is one facility for neglected students in Richmond County School District: Lighthouse which is a residential facility. Lighthouse is monitored on the same timeline as other schools in the district. Additional information about services for homeless children and youth is located in section 14.

## **Section 3**

### **Monitoring of Private Schools**

The Richmond County School System currently has one Private School that has chosen to participate in the Title I program. The private school worksheet is completed and attached to the consolidated application to ensure that all reservations related to parent and family engagement , instructional lead teachers, professional learning, and paraprofessionals have been reserved.

The Every Student Succeed Act of 2015 requires the LEA to provide to eligible private school children, their teachers, and their parents Title I services equitable to the services being provided to similar children, their teachers, and parents attending public schools. The LEA ensures that it complies with the requirements of the Title I regulations.

### **Procedures followed by the LEA for required consultation**

In the fall, usually October, a letter of interest containing a District invitation to Private Schools to Consult Form is mailed to private schools to determine if they desire to participate in federal programs the following calendar year. Letters are sent certified mail at least three weeks prior to the initial consultation meeting and include date, time, and location of the meeting.

An annual private school consultation meeting is held after receiving confirmation of participation from private schools. During the consultation meeting, the LEA will discuss how to identify needs of eligible private school children, what services will be offered to those eligible children, required components of Title I Services, and resources available. An affirmation of consultation will be signed by the LEA and the private school official.

Evidence:

- District Invitation to Private Schools to Consult Form
- Agenda
- Sign-in sheets

- Meeting minutes
- Copy of signed Affirmation of Consultation

### **Selection of eligible students**

Eligibility criteria are used to determine the students who are most in need of services. Using assessment data provided by the private school, scores/levels are given ranges and point values are applied to those ranges. Based on the point values, students are ranked; the lowest ranking children are selected for services. After analyzing assessment data and determining eligible private school children, a needs assessment will be conducted and a targeted assistance school-wide plan will be developed.

### **Requirements for financial record keeping**

Financial records are kept by the budget manager and approved by the Title I Director prior to allocating funds to the private schools. Allocation of funds for private schools that confirm participation in the Title I program will be determined based on DE1111 forms collected in September.

Evidence:

- DE1111 form

The LEA maintains control of the Title I funds, materials, equipment, and property that support services to private school children. The Title I Director allocates funds to private schools based on per pupil allocations and required equitable services amounts. Title I Inventory Specialist maintains inventory of materials, equipment, and property. The private school in collaboration with the LEA will complete an inventory check annually. No requests for reimbursement will be allowed as all purchases must be approved by the Title I director prior to the purchase. All materials and supplies purchased by the LEA are the property of the LEA and must be returned to the LEA at the time the private school no longer participates.

Evidence:

- Copies of invoices
- Property inventory
- Purchase preapprovals
- Expenditure reports

### **Use of Title I Equipment and Resources**

Materials and equipment purchased at private schools participating with federal funds may only be used for identified targeted students, their teachers, and parents. These materials and equipment are kept separately from other school materials and equipment. Equipment/materials must be checked out and must be returned. Non-targeted students and personnel who do not work with targeted students may not have access to these materials and equipment. It is the responsibility of the private school principal to inform all staff of these guidelines and to ensure that they are followed.

### **Third Party Vendors**

When a third party is serving Title I school children through a contract with the LEA, the LEA must document that the third party is providing Title I services to eligible school children in accordance with all Title I requirements. Administrative costs for the private contractors are taken off the top.

Evidence:

- A copy of the contract
- Consultant Agreement
- Observation forms
- Technical assistance forms
- Proof of service forms
- Payroll summaries

### **Evaluation**

The LEA will evaluate the Title I program serving private school students and make modifications as necessary. Monthly observations will be conducted by the LEA based on the school's needs and to ensure targeted students are being served. The LEA will meet monthly with Title I staff of private schools to determine any needed modifications.

Evidence:

- Observation forms
- Technical assistance forms
- Revised targeted assistance school-wide plan

At the end of May, the LEA will ask each private school to complete a survey to evaluate services provided by the LEA. The private school official(s) will also complete an evaluation of Title I program effectiveness at the end of the year using a document provided by GADOE. The annual evaluation of the private school program should include goals written in measurable terms, summary evaluation of each goal, and an overall narrative summarizing the progress made and identifying adjustments or changes to the private school program that will be made for the upcoming year. Areas to be included in evaluation:

- Student academic achievement
- Parent and family engagement
- Professional development
- Additional goals based on the program design

In addition to the required areas of evaluation, the final evaluation must include the dates of the consultation meetings and a dated final narrative that reviews the effectiveness of the program and identifies modifications for the upcoming school year with signatures of the Title I Director and the private school administrator.

Evidence:

- Completed survey
- Evaluation of program

- Copy of signed narrative

**Complaint procedures for private school officials**

Complaint procedures should be placed on private school's letterhead and distributed to parents. Dissemination form to document distribution of complaint procedures should be collected by the LEA. Complaints filed by the private school are filed in compliance with the LEA complaint process (see Complaint Procedure).

**Evidence:**

- Complaint procedure on school letterhead
- Dissemination form (signed and dated)

## Timeline: Private Schools

Month	Action	Person Responsible
July-August	<p>Attach the following Title I documentation to the CLIP (for existing private school programs):</p> <ul style="list-style-type: none"> <li>• Affirmation of consultation</li> <li>• Affirmation of Equitable Services</li> <li>• Evaluation of Title I Private School Program</li> </ul> <p>If any third party vendor is contracted, the LEA and private school official should sign a letter that states the requirements for both parties to enter into agreement.</p>	<p>Title I program specialist serving private schools</p> <p>LEA and private school official</p>
September	<p>Begin Title I services for students identified the previous spring. Provide private school officials with students' names, services to be provided, and names of Title I teachers.</p> <p>Obtain a list of newly enrolled students who meet eligibility criteria. Consult with private school officials on how new students might be accommodated in the program.</p> <p>Conduct academic pre-assessments</p> <p>Host Title I parent information meeting for participating parents, and complete a parent compact.</p>	<p>Local Education Agency (LEA)</p> <p>LEA</p> <p>Private school official</p> <p>Private school official supported by TI program specialist</p>
October	<p>Send letter to request participation to private schools who work with Richmond County students for the following school year; hold private school meeting consultation.</p> <p>Gather data and consult with private school to determine services and possible participants.</p> <p>Begin to gather data for Eligible Participation Worksheet.</p> <p>Remind private schools that any materials or purchases must be requisitioned and remains the property of Richmond County Schools.</p>	<p>LEA</p> <p>TI program specialist</p>

September - November	Visit private school site to determine services are rendered in accordance with federal requirements; monitor all services regularly.	TI program specialist
January - May	Visit private school site to determine services are rendered in accordance with federal requirements; monitor all services regularly.  Plan for evaluation of services with a survey at the end of April/beginning of May.	
May - June	Complete all necessary reports, contract negotiations, hiring, ordering of materials  Finalize the designs of the Title I programs for upcoming year to include Parent and Family Engagement calendar and professional learning calendar	Private school official LEA

### **Budgets**

Schools submit budgets and required documentation to the Title I Director for review and approval. The budgets are maintained by the director electronically and ultimately entered into the GADOE Consolidated Application for approval. The budgets are referenced when invoices, timesheets, requisitions, and professional learning forms are submitted to the Director of Federal Funds for approval.

Formal and informal meetings as well as phone calls and e-mails provide technical assistance and monitoring feedback.

E-mails and calls often serve as calendar reminders for item due dates. If/When schools need to correct or resubmit an item, either a meeting is held, a phone call is made, or an e-mail is sent describing the issue and how to correct it.

### **Data collection instruments (interview guides, documents review checklists).**

The Title I (LEA) department conducts ongoing monitoring of all required documents, on a timeline, that is provided to principals at the initial administrators meeting and during the summer before the beginning of the school year. The timeline includes requested documents, a due date, and dates when documents are submitted to Title I. The documents are collected, reviewed using checklists and rubrics. The documents are placed in an identified federal program monitoring bin, which is located in the Title I office. The Program Specialist uses the GADOE Schoolwide and Targeted Assistance checklist to ensure that the documents meet federal guidelines and are in compliance.

The program specialists provide technical assistance to each principal and or designee to ensure that the documents are being collected in a timely fashion, to ensure that all deadlines are met.

Formal and informal meetings (on-site and system) as well as phone calls and e-mails provide technical assistance and monitoring feedback. Checklist, rubrics, and LEA created forms are used as collection forms.

If/When schools need to correct or resubmit an item, either a meeting is held, a phone call is made, or an e-mail is sent describing the issue and how to correct it.

#### **1.1f. Process for identification of high risk schools.**

##### **Process for identification of high risk schools**

Schools are tiered based on CCRPI and plans are developed to include specifics on academic achievement, operational effectiveness, and community engagement. Schools that are federally identified are given specific requirements to include in their plans.

Schools that have been identified through the ESSA Waiver or the schools that have been identified through the Governor's Office of Student Achievement. (Priority, Focus and Opportunity) The LEA works with these schools through the Georgia School Key-Standards. Identification for Federal Priority Schools (ESSA)

- Title I Schools
- 3-year average of content mastery category performance
  - Category performance will be weighted by enrollment for schools with more than one grade band
  - Schools must have 3 years of data
- Rank schools by 3-year average of category performance
- Select lowest 5%
- Add schools with graduation rates <60% for 2 consecutive years
  - 2014-2013 4-year cohort graduation rate
- Schools identified as Priority Schools in 2012 which did not meet the exit criteria will be re-identified as Priority Schools

##### Identification for Federal Focus Schools (ESSA)

- Title I schools
- Must not meet the definition of a Priority School
- 3-year average of Achievement Gap scores
  - Achievement Gap will be weighted by enrollment for schools with more than one grade band
  - Schools must have 3 years of data
- Rank schools by 3-year average of Achievement Gap scores
- Select lowest 10%
- Schools identified as Focus Schools in 2012 that did not meet the exit criteria will be re-identified as Focus Schools

##### Identification for Opportunity School District Initiative (GOSA)

- In the governor's proposal, schools that would qualify for the Opportunity School initiative are defined as those scoring below 60 on the Georgia Department of Education's accountability

measure, the College and Career Performance Index, for three consecutive years. If the legislation passes, the Richmond County School System currently has 20 schools that would qualify.

AdvancedED uses a tool for to assist with accreditation called ELEOT. ELEOT looks at seven areas and is student-focused, not teacher focused. These areas include: Equitable Learning Environment, High Expectations Environment, Supportive Learning Environment, Active Learning Environment, Progress Monitoring and Feedback Environment, Well-Managed Learning Environment, and Digital Learning Environment.

Schools identified by the Governor's Office of Student Achievement (GOSA) will be the first schools to use the ELEOT Observation tool. Teams from the Curriculum & Instruction and Technology Division will go to these schools to conduct these observations first. The district will debrief the findings.

The next step will be schools that had the highest gains on their 2016 CCRPI score. The district will compare the findings. Based on findings, the high needs schools principals and/or leadership team will do site visits to the schools with the higher gains to observe the school setting.

### **High Risk Schools**

The Richmond County School System will tier schools on a map of our county. These schools will be tiered based on their CCRPI scores.

Tier 1- CCRPI 60-100

Tier 2- CCRPI 55-65

Tier 3- CCRPI 50-54

Tier 4- CCRPI below 50

Once these schools are tiered, a meeting with leaders throughout the county will be conducted to analyze and discuss the needs that exist. These could include needed after school programs, Boys and Girls Clubs, and other community resources<sup>[WL1]</sup>.

### **1.1g. Process for follow-up/verification of implementation of required corrective action**

#### **Process for follow-up/verification of implementation of required corrective action.**

After an on-site monitoring visit by the GaDOE, the LEA will receive a comprehensive monitoring report which will contain recommendations, findings, and required actions that provide an analysis of the implementation of the LEA's federal programs. If corrective action is required, the LEA/Program Director will respond in a timely manner with the LEA/Program Director will respond in a timely manner with a Corrective Action Plan which must be approved by GaDOE. Implementation of the Corrective Action Plan will be monitored by the appropriate Title Program Education Program Specialist. 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 systematically providing technical assistance and collecting data in order to provide information that can guide program implementation.

If the LEA finds items in the schools that require any corrective actions toward the federal programs, Program Specialists and System & School Effectiveness Specialist reports all findings to the Title I Director.

- Documentation at all levels are consistently kept to address the school key-standards and how those are implemented.
- Focus walks conducted by the GaDOE's office of District and School Effectiveness, CSRA-RESA, and the RCSS looks for specifics regarding corrective actions depending on the findings from the monitoring and documentation.

Corrective actions are most often noted in e-mail communications, written reports, rubrics, and checklists between the Title I Director, Coordinator, Program Specialists, System & School Effectiveness Specialist and school personnel. Formal letters are provided to those requiring face-to-face meetings regarding on-going programmatic issues.

After the Title I Program Specialist has reviewed the Title I Schoolwide Plan, a corrective action checklist is completed and schools are rated as "met" or "not met" status for each of the eighteen components. If the Title I Schoolwide Plan needs corrections, a meeting is held with each principal to discuss the corrective actions and technical assistance is provided as needed. Title I Schoolwide committee meetings are scheduled to revise and update the plan according to the corrective actions.

Technical Assistance is provided by the Coordinator and Title I Program Specialists to assist the Principals and Leadership Teams in ensuring that all budgetary items are allowable expenditures under Title I rules, regulations and guidelines. If budgets are submitted with items that are not allowable, reasonable or necessary a meeting is requested by the Program Specialist

### **Monitoring reports, corrective actions from the schools visited as part of the on-site review.**

The Program Specialists provide technical assistance to each principal and or designee to ensure that the documents, Extended Learning Programs, School Improvement/Schoolwide Plans and materials meet federal guidelines. The documents are collected and reviewed using checklists and rubrics. Rubrics, checklists, and reports are used to evaluate all programs and professional learning activities.

Corrective actions are most often noted in e-mail communications, written reports, rubrics, checklist, and observations forms.

### **Evidence of technical assistance provided by the LEA as a result of issues identified through the monitoring process.**

Schools have been tiered according to compliance and fidelity of the school key-standards. Tier 2 and Tier 3 schools are those that are receiving the most support at leadership team meetings. All priority and focus schools have leadership team meetings twice a month. Support from the LEA is ongoing at all schools during the school day and at leadership team meetings.

### **LEA's schedule for monitoring of schools.**

The LEA federal programs have regular communications and provide technical assistance to schools to assist in improving student academic achievement. Each Title I Program Specialists is assigned to a cluster of schools. The LEA utilizes a set schedule to conduct ELEOT observations. Each instructional member of central office participates in quarterly monitoring of standards.

### **1.1s. Procedures for follow-up/verification of implementation of required corrective actions identified by the LEA.**

Corrective action from previous monitoring is discussed with principals in order to assist them in understanding the critical need for compliance in Federal Programs. In addition, GaDOE monitoring findings from all districts is shared with principals as a means of understanding the impact of non-compliance. Professional learning is provided based on the needs but, in addition, professional learning is used as a preventive measure to ensure that all staff has a clear understanding of all expectations of every facet of federal programs. The Title I Director, along with district level staff, and outside consultants, provide on-going training as a means of ensuring that all staff are in compliance at all times. Anticipatory training is conducted throughout the year that ties in directly with all facets of Federal Program compliance.

SWP/SIP/TAP includes data which drives student achievement and are monitored by the Title I Director, Coordinator, and Program Specialist at least three times per year. Based on continuous data analysis, principals and leadership teams make changes to the school improvement plans. Feedback on the SWP/SIP/TA are sent to each principal via the schoolwide checklist. Corrections to the plans are made as needed by principals and updated copies are sent to the district office. All correspondences related to Title I are maintained at the central office level by either the Director, Coordinator or Title I Program Specialist. The Corrective Actions are shared with the Principals, along with the Corrective Action Plan(s). Technical Assistance is maintained either as an archived

email or in a monitoring file to include an agenda and sign-in sheet documenting the assistance.

### **Strategies for academic intervention (Extended Learning Programs):**

- Schools are required that there is a clear linkage of the scientific research-based strategies to the identified areas of need.
- Schools are required to provide a description of the program(s) used.
- Schools are required to provide a clear description of how strategies used during ELP are different than strategies being used during the regular school day.

### **Program delivery model:**

- Each school is allowed to determine when ELP tutorial services will be offered at their school using one of the models below:

#### **Extended Day Models**

Offer ELP during connections

Offer as an elective

Offer ELP before or after school

Offer ELP on Saturday

Offer ELP during the summer

- Schools are required to be specific regarding the delivery schedule and clear as to how the ELP delivery model is supplemental and that there is sufficient time allowed to achieve sustainable results. In addition the ELP address the delivery schedule (when, where, how), hours of service, student/instructor ratios, progress monitoring, plans to address program modifications when applicable, transportation services, etc.

### **Professional development for ELP staff**

- ELP schools must provide professional development to the staff members' who teach in the area of their declared core content focus.
- Schools are required to ensure that professional development is tailored to the needs of participating students. Instructional strategies are effective in helping at-risk students achieve success.
- Professional development is specific, unique to learners in the ELP, and provided to the instructional staff in the ELP, not the entire faculty. This professional learning must be related to instruction only.
- Schools choosing to use a vendor to facilitate professional learning must complete a "Consultant Packet" using the following approval process:

- ☐ Principal
- ☐ Title I Director
- ☐ Area Superintendent,
- ☐ Director of HS Curriculum & Instruction
- ☐ Procurement Department
- ☐ Legal Department
- Schools are required to ensure that professional development is tailored to the needs of participating students. Instructional strategies are effective in helping at-risk students achieve success.

[WL2][CE3]

### **Encouraging ELP attendance**

- The LEA gives support and flexibility to each ELP school to devise and monitor attendance procedures as needed. Attendance data will be monitored by the school and should be reported to the school's Leadership Team. Students are recognized for attendance and academic excellence. Schools are given autonomy to develop creative ways of encouraging attendance since, incentives will not be paid for out of Title I, Part A funds.
- Throughout the school year, schools are encouraged to have an ELP (Extended Learning Program) night conducted to inform the parents about the program. Flyers will be sent home by students informing their parents of the ELP night. Announcements will be made at the recreational school functions. Parents will be contacted via phone and a flyer with a registration form will be sent home for schools that do not have ELP embedded within the school day. Also, schools are required to place information concerning the program on the school website, in the school parent center, front office and a global connect messages and any other methods the schools can devise. Follow-up phone calls will be made to parents of eligible students with the greatest need to ensure that parents are aware of the program and their child's need to participate. In addition, follow-up phone calls will be made to parents of eligible students with the greatest need of students that opt out. Students who are absent are contacted by the ELP teacher, Parent Facilitator or school administrator and encouraged not to miss school.
- Any available space will be filled with students according to the rank order as determined by the school's multiple educationally related selection criteria.

### **A system of internal controls**

The LEA will ensure that the school's ELP adhere to and follow the established RCSS and Title I protocol for maintaining documentation the following by emphasizing the following.....

- The fidelity of the implementation will be monitored by the Coordinator and The Title I staff will observe the elements of each school's ELP at least twice monthly by doing focus walks via Goggle Docs. Each ELP school is required to maintain a school ELP notebook. This will include review of all forms such as attendance records, lesson plans, and parent conference summaries

information.

- Richmond County schools has a systematic process for approved funding at the school site level requiring that all resources, professional learning, and all supplies have prior approval through purchasing/internal auditing department.
- The ELP School are required to maintain accurate ELP attendance by insuring that student data is being recorded, analyzed and reported. This team will also report program effectiveness, and maintain ELP Portfolios. Each ELP teacher will be responsible for maintaining confidentiality of students ELP records and will follow the RCSS protocol surrounding student records and grades.
- The request for funds are written on system requisition order forms and recorded as Title I ELP expenditures and sent to the Director of Title I. The Title I Director will review all expenditures to ensure they are necessary, allowable and supplemental. All expenditures will be approved by the District Title I Director.

### **Evaluation of the ELPs and identifying measurable goals**

- Schools are required to develop an assessment instrument used to measure each program target/goal
- Schools are required to develop a plan/procedure(s) for administering assessment instruments and for collecting and maintaining data.
- A timeline for assessments must be provided to include how the school will maintain student assessment information and ensure confidentiality.
- Schools and LEAs are required to provide an explanation of the LEA's/ school's data analysis plan in terms of how the LEA/school determine program effectiveness based on the program goals and measurement instruments listed
- Schools and LEA are required to Include a description of the procedures the LEA/school will implement to collect, analyze, and report participant feedback.
- Schools and LEA are required to describe the LEA's/school's plan for informing stakeholders regarding results of the program evaluation, effectiveness of the program, and ongoing program improvement(s).

### **Single Audit**

The Title I Director will maintain all documentation in the Title I Department which is available for future auditing/monitoring according to the LEA Monitoring Form, which is issued annually by GaDOE.

## **Section 2: Comprehensive LEA Improvement Plan**

Section 1116 of the Title I, Part A Every Student Succeeds Act (ESSA) of 2015 specifies that LEAs may receive funds under ESSA if the LEA has an approved plan on file with GaDOE. The LEA plan is submitted as part of a Consolidated Application under Section 9305 of ESSA. The CLIP has three major components: ESSA/IDEA Plan Descriptors; System Profile; LEA Implementation Plan. The following programs are a part of the CLIP: Title I, Part A – Programs for Disadvantaged Children; Title I, Part C – Education of Migratory Children; Title I, Part D – Programs for Neglected and Delinquent Children; Title II, Part A – Teacher Quality; Title II, Part D – Enhancing Education Through Technology; Title III, Part A – Language Instruction for Limited English Proficient (LEP) and Immigrant Students; Title IV, Part A – Safe and Drug-Free Schools; Title VI, Part B – Rural Education Achievement Programs (REAP); Individuals with Disabilities Act (IDEA) – Programs for Exceptional Students; Carl D. Perkins Vocational and Applied Technology Act – Vocational Education Programs; Title X, Part C McKinney-Vento Education of Homeless Children and Youth (EHCY) and State Professional Learning.

**Review and approval process for LEA plans including written procedures. (Review checklists, established schedule, and samples of correspondence with schools and other LEA departments.)**

The Comprehensive LEA Improvement Plan and the equity plan revisions take place annually using the previous year's data and needs assessment information.

The CLIP and Equity Plan serves as the plans detailing coordination of various federal programs and identification of needs and in-turn budgeting for such needs with federal funds. Department Directors, school and system leaders, as well as community and parent stakeholders are involved in the revision process. CLIP Revision Tips as well as PowerPoints from GaDOE (Consolidated Application) are used as tool to lead discussions and revisions. All parents are sent information inviting them to participate via mail, email, telephone, newspaper, social media, flyers, website, and newsletters. 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. Documentation includes sign-in sheets, agendas, meeting minutes, emails, and returned plans with comments. Copies of comments are kept on file and put in meeting minutes. Several subsequent meetings are arranged to garner input from all stakeholders. For example, input is solicited from district, school, and curriculum leaders at monthly Principal, Administrative Council, and Curriculum Advisory Council meetings. Input is also sought from district leaders and parents during the annual district parent meeting held in May. The Directors gathers all input and updates the CLIP. 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), are provided the opportunity to review and make any final changes before the CLIP is submitted for approval by the GaDOE by the Title I Director. The plan is submitted to Superintendent for final approval.

The school has the flexibility to use local assessments for criteria for students who are in grade levels in which state assessments are not administered.

**2.1.a. Review the approval process for SWP and TA including written procedures. (Review checklists, established schedule, and samples of correspondence with schools and other LEA departments.)**

SWP/SIP/TAP includes data which drives student achievement and are monitored by the Title I Director, Program Specialist and the districts Accountability Team at least three times per year. Based on continuous data analysis, principals and leadership teams make changes to the school improvement plans. Feedback on the SWP/SIP/TA are sent to each principal via the schoolwide checklist. Corrections to the plans are made as needed by principals and updated copies are sent to the district office. All correspondences related to Title I are maintained at the central office level by either the Director or Title I Program Specialists. The Corrective Actions are shared with the Principals, along with the Corrective Action Plan(s). Technical Assistance is maintained either as an archived email or in a monitoring file to include an agenda and sign-in sheet documenting the assistance.

Each school is responsible for creating a planning committee, conducting a comprehensive needs assessment, identifying specific goals and strategies that address their needs and conducting an annual review of effectiveness of the plan. Schools are tiered based on CCRPI and plans are developed to include specifics on academic achievement, operational effectiveness, and community engagement. Schools that are federally identified are given specific requirements to include in their plans.

Developing the school improvement plan and monitoring progress is a continuous plan. The LEA provides technical assistance on creating school improvement plans with the use of program specialists that support schools in developing, revising, implementing and coordinating target assistance and school improvement plans as a part of the Leadership Team Meetings at individual schools. In these meetings, the data is analyzed to identify problems and discuss solutions to the identified problems. The leadership team actively seeks scientifically rESSArch based instructional supplemental materials and resources to support the core academic curriculum to ensure success for all students.

The Accountability Department collaborates with all supporting LEA Departments to provide a calendar/outline of the training, feedback, and monitoring that occurs throughout the year. School level plans are presented by principals during the fall and mid-year to the superintendent, area superintendents and central office staff. Plans are revised as necessary. EVIDENCE IN BIN#1

The School Improvement Plan (SIP) plans are reviewed and revised on a regular basis throughout the school year at the school level by school improvement teams consisting of the Leadership Team, administrative team, and stakeholders, School Improvement Committee, School Council, and parents. During the summer after state test data becomes available, an intense review and data analysis is conducted. Teacher observations, discipline data, and overall

needs of the school are analyzed and become a part of the plan. The initial drafts are due in August and are reviewed by the Accountability and Title I teams. The plans are reviewed and monitored to ensure that strategies are working and achieving results in collaboration with the Accountability Team. Schools are required to post their SIP on their websites and inform parents that they can be accessed online, at the school, or a hard copy can be mailed to them upon request. The Title I Director and the District's Accountability Team provides the Title I principals with a template to write the schoolwide plan that addresses each component. The Title I Director applies the Schoolwide Checklist to monitor the plan. Sign-in sheets and agendas are required and collected from the annual meeting and all other meetings. The Schoolwide/SIP Program template and checklist is located on the Richmond County website. On-site monitoring meetings with principals are held throughout the fiscal year to discuss the current status of their plans in regard to the checklist components. Missing or items in need of revision are marked on the checklist and then rechecked when the revised plan is submitted.

### **2.1 b Resolution procedures for unapproved plans.**

If the GaDOE requests revisions, the Title I Director retrieves the requested changes from the Audit Trail in the GaDOE portal. The Title I Director then communicates with the GaDOE Program Specialist and the appropriate school or district based personnel to ensure that requested changes are submitted to the Title I Director. The Title I Director provides technical assistance as appropriate, makes corrections and/or approves corrections in the CLIP, and then resubmits the CLIP. This process is continued until the system's CLIP has been approved by GaDOE.

Unapproved Schoolwide Plans, Parent and Family Engagement Plans, ELP Plans, Parent-Teacher Compact etc. are returned to the principal or designee of the school for revisions. The assigned Program Specialist is responsible for providing technical assistance to ensure that plans are following all guidelines. After revisions are made, it is then re-submitted to the Director of Title I and/or Program Specialist for review. This process continues until the plan meets federal requirements.

### **Guidance to schools and other LEA departments on submission of plan amendments.**

- There are three major components of the CLIP: ESSA/IDEA Plan Descriptors, System Profile, and LEA Implementation Plan. 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
- Department Directors, school and system leaders, as well as community and parent stakeholders are involved in the revision process. CLIP Revision Tips as well as webinars and PowerPoints from GaDOE (Consolidated Application Training) are used as tool to lead discussions and revisions.
- Title I parents are sent information inviting them to participate via mail, email, telephone, newspaper, social media, flyers, website, and newsletters. 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. Documentation includes sign-

in sheets, agendas, meeting minutes, emails, survey responses and returned plans with comments. Copies of comments are kept on file and put in meeting minutes.

- The Title I Director gathers all input and updates the Consolidated Action Plan. The plan is submitted to the Superintendent for final approval.

**Schedule/timeline regarding the process for submission, revisions, and final edits for LEA plans.**

During the Instructional Team meeting the Assistant Superintendent discusses a plan to complete the CLIP

July

- CLIP revision discussed at District Instructional Team Meeting
- Each school participates in a comprehensive needs assessment process. Program Specialist provide additional support to schools in the school improvement process based upon the needs of each individual school.
- The superintendent, all central office personnel, principals, assistant principals, and other lead school personnel review system data from the state mandated assessments and local benchmarks.
- A comprehensive professional learning on how to complete a needs assessment is completed by schools.
- All departments set a plan and timeline to review, revise, edit and complete their sections of the CLIP. SEE SAMPLE FROM TITLE I DEPARTMENT BELOW
- All departments submit final revisions of the CLIP into the consolidated application by July 15.
- District meeting to revise district parent and family engagement policy and plan.
- CLIP due to GaDOE by July 31

**Title I LEA Consolidated Application  
Descriptor Revision Assignments**

- Please review and revise your assigned CLIP descriptors. Only check the Title I information under each descriptor.
- A Buddy Check System has been designed for dual control of each section
- Buddy Check: In the month of July

<b>BUDDY CHECK</b>	
Andrews-Milton	Tate
Chavous	Wright
Accountability Team	Smith
Grammer	Bolton

- Revision Completion Date: The second week in July
  - Revisions will be discussed during the staff meeting

- All revisions will be input into the CLIP at least two weeks prior to the due date of July 31.

<b>Descriptor</b>	<b>Checker</b>
1 – 3	Chavous
4	Non – Title I
5-6	Bolton
7	Non – Title I
8-9	Bolton
10	Non – Title I
11-14	Chavous
15	Wright
16	Smith
17	Andrews-Milton
18-21	Grammer
22	Chavous
23-27	Tate
28-31	Non – Title I

**Sample amendment requests (CLIP, ELP, SWP, TA, Parent and family engagement , etc.) and LEA approval/denial.**

The Title I Director retrieves the requested changes from the Audit Trail in the GaDOE portal as well by email from the GaDOE Title I Education Program Specialist. The Title I Director provides technical assistance as appropriate, makes corrections and/or approves corrections in the CLIP, and then resubmits the CLIP. This process is continued until the system’s CLIP has been approved by GaDOE. SAMPLE COMMUNICATIONS ARE ATTACHED

**Evidence of timely plan approval and release of funds.**

Title I Part A is a federally funded program under the Elementary and Secondary Education Act of 2015 (ESSA). This Act provides federal funds through the Georgia Department of Education (GaDOE) to local education agencies (LEAs) and public schools with high percentages of poor children to help ensure that all children meet challenging State academic content and student academic achievement standards.

Title I schools must submit their Title I budget and Title I School Improvement Plans (SWP & TA) for approval by the Title I Director to ensure all expenditures are allowable and support their School Improvement Plan and Title I Program. The Title I School Improvement Schoolwide Plan and Targeted Assistance checklist are utilized by the school to ensure compliance and is signed by the Title I Director upon approval. After budgets are submitted and approved by the Title I Director, the Budget Manager enters budget in the Consolidated Application it is important that the descriptions of all budgeted items must be specific and clearly describes the intent of the expenditure.

All items budgeted must meet the allocable, allowable, reasonable, and necessary tests described in the OMB Circulars.

Are the expenditures allowable Title I expenditures?

Do the expenditures appear to be necessary in light of the LEAs goals and objectives?

Are the costs of the expenditures reasonable?

Are the expenditures for core subject areas?

Prior to release of any budgets the Title I Program Specialist reviews the plans for the LEA's in the Consolidated Application. After the approval, funds are released to the schools.

EVIDENCE IN BINS

**Evidence that the LEA's plans include input from teachers, principals, administrators (including administrators of other programs described in Title I, Part A) and other appropriate school personnel, and parents of children in schools receiving Title I services.**

- All parents and stakeholders have the opportunity to review and revise the CLIP through small group discussions and suggestions. Parents are notified through media, district website, calling post, and mailed letters to be given an opportunity to review and revise the CLIP. Title I will annually review and revise a comprehensive plan for improving student academic achievement in all core subject areas. The meetings are documented through agendas, sign in sheets, PowerPoint presentations, and meeting handouts. EVIDENCE is located in Bin #1
- 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), provide input and review changes before the CLIP is submitted for approval by the GaDOE. EVIDENCE IN BINS

**Description of Pre-Kindergarten services that are provided (if applicable).**

#### **Pre-Kindergarten Programs**

- The Title I Director and the Director of Pre K collaborate on a regular basis.
- The district does not reserve funds for pre-kindergarten programs at this time. The Pre-K Director meets with area Head Start and private daycare centers to discuss potential concerns. Policies and procedures will be put in place if the district determines that this is a Title I need in the future.

The Title I office does provide scientifically-based preschool information for parents at the parent resource centers. This information is updated annually and serves as a means for connecting Title I parents with information their children will need to know before entering kindergarten

## **Section 3 Services to Eligible Private School Children**

### **Procedures followed by the LEA for required consultation**

In the fall, usually October, a letter of interest containing a District invitation to Private Schools to Consult Form is mailed to private schools to determine if they desire to participate in federal programs the following calendar year. Letters should be sent certified at least three weeks prior to the initial consultation meeting and should include date, time, and location of the meeting.

An annual private school consultation meeting is held after receiving confirmation of participation from private schools. During the consultation meeting, the LEA will discuss how to identify needs of eligible private school children, what services will be offered to those eligible children, required components of Title I Services, and resources available. An affirmation of consultation will be signed by the LEA and the private school official.

Evidence:

- District Invitation to Private Schools to Consult Form
- Agenda
- Sign-in sheets
- Meeting minutes
- Copy of signed Affirmation of Consultation

### **Selection of eligible students**

Eligibility criteria are used to determine the students who are most in need of services. Using assessment data provided by the private school, scores/levels are given ranges and point values are applied to those ranges. Based on the point values, students are ranked; the lowest ranking children are selected for services. After analyzing assessment data and determining eligible private school children, a needs assessment will be conducted and a targeted assistance school-wide plan will be developed.

### **Requirements for financial record keeping**

Financial records are kept by the budget manager and approved by the Title I Director prior to allocating funds to the private schools. Allocation of funds for private schools that confirm participation in the Title I program will be determined based on DE1111 forms collected in September.

Evidence:

- DE1111 form

The LEA maintains control of the Title I funds, materials, equipment, and property that support services to private school children. The Title I director allocates funds to private schools based on per pupil allocations and required equitable services amounts. Title I Inventory specialist maintains inventory of materials, equipment, and property. The private school will complete an inventory check twice per year at the request of the LEA. No requests for reimbursement will be allowed as all purchases must be approved by the Title I director prior to the purchase. All materials and supplies purchased by the LEA are the property of the LEA and must be returned to the LEA at the time the private school no longer participates.

Evidence:

- Copies of invoices
- Property inventory
- Purchase preapprovals
- Expenditure reports

### **Use of Title I Equipment and Resources**

Materials and equipment purchased at private schools participating with federal funds may only be used for identified targeted students, their teachers, and parents. These materials and equipment are kept separately from other school materials and equipment and must be checked out and back in. Non-targeted students and personnel who do not work with targeted students may not have access to these materials and equipment. It is the responsibility of the private school principal to inform all staff of these guidelines and to ensure that they are followed.

### **Third Party Vendors**

When a third party is serving Title I school children through a contract with the LEA, the LEA must document that the third party is providing Title I services to eligible school children in accordance with all Title I requirements. Administrative costs for the private contractors are taken off the top.

Evidence:

- A copy of the contract
- Consultant Agreement
- Observation forms
- Technical assistance forms
- Proof of service forms
- Payroll summaries

### **Evaluation**

The LEA will evaluate the Title I program serving private school students and make modifications as necessary. Monthly observations will be conducted by the LEA based on school's needs and to ensure targeted students are being served. The LEA will meet monthly with Title I staff of private schools to determine any needed modifications.

Evidence:

- Observation forms
- Technical assistance forms
- Revised targeted assistance school-wide plan

At the end of May, the LEA will ask each private school to complete a survey to evaluate services provided by the LEA. The private school official will also complete an evaluation of Title I program effectiveness at the end of the year using a document provided by GADOE. The annual evaluation of the private school program should include goals written in measurable terms, summary evaluation of each goal, and an overall narrative summarizing the progress made and

identifying adjustments or changes to the private school program that will be made for the upcoming year. Areas to be included in evaluation:

- Student academic achievement
- Parent and family engagement
- Professional development
- Additional goals based on the program design

In addition to the required areas of evaluation, the final evaluation must include the dates of the consultation meetings and a dated final narrative that reviews the effectiveness of the program and identifies modifications for the upcoming school year with signatures of the Title I Director and the private school administrator.

Evidence:

- Completed survey
- Evaluation of program
- Copy of signed narrative

#### **Complaint procedures for private school officials**

Complaint procedures should be placed on private school's letterhead and distributed to parents. Dissemination form to document distribution of complaint procedures should be collected by the LEA. Complaints filed by the private school are filed in compliance with the LEA complaint process (see Complaint Procedure).

Evidence:

- Complaint procedure on school letterhead
- Dissemination form (signed and dated)

## Timeline

Month	Action	Person Responsible
July-August	<p>Attach the following Title I documentation to the CLIP (for existing private school programs):</p> <ul style="list-style-type: none"> <li>• Affirmation of consultation</li> <li>• Affirmation of Equitable Services</li> <li>• Evaluation of Title I Private School Program</li> </ul> <p>If any third party vendor is contracted, the LEA and private school official should sign a letter that states the requirements for both parties to enter into agreement.</p>	<p>Title I program specialist serving private schools</p> <p>LEA and private school official</p>
September	<p>Begin Title I services for students identified the previous spring. Provide private school officials with students' names, services to be provided, and names of Title I teachers.</p> <p>Obtain a list of newly enrolled students who meet eligibility criteria. Consult with private school officials on how new students might be accommodated in the program.</p> <p>Conduct academic pre-assessments</p> <p>Host Title I parent information meeting for participating parents, and complete a parent compact.</p>	<p>Local Education Agency (LEA)</p> <p>LEA</p> <p>Private school official</p> <p>Private school official supported by TI program specialist</p>
October	<p>Send letter to request participation to private schools who work with Richmond County students for the following school year; hold private school meeting consultation.</p> <p>Gather data and consult with private school to determine services and possible participants.</p> <p>Begin to gather data for Eligible Participation Worksheet.</p> <p>Remind private schools that any materials or purchases must be requisitioned and remains the property of Richmond County Schools.</p>	<p>LEA</p> <p>TI program specialist</p>

September - November	Visit private school site to determine services are rendered in accordance with federal requirements; monitor all services regularly.	TI program specialist
January - May	Visit private school site to determine services are rendered in accordance with federal requirements; monitor all services regularly.  Plan for evaluation of services with a survey at the end of April/beginning of May.	
May - June	Complete all necessary reports, contract negotiations, hiring, ordering of materials  Finalize the designs of the Title I programs for upcoming year to include Parent and Family Engagementcalendar and professional learning calendar	Private school official LEA

## **Fiduciary Responsibility**

### **Section 4.1: Maintenance of Effort (MOE)**

The RCSS MOE is completed by the GADOE. 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.

To ensure that the district continues to meet its MOE obligations, the Title I Director works closely with the Finance Office to ensure that the LEA expends at least 90% of the amount expended in the prior program year.

Documentation for MOE is only required for districts that do not meet the required maintenance of effort. A districts’ MOE is completed by the GaDOE.

The Richmond County School System met MOE.

In the event that the LEA fails to meet MOE, the SEA will contact the LEA, requesting that that LEA writes an appeal letter. With the LEA’s request, the SEA will make an appeal to the US Department of Education on behalf of the LEA (and other LEAs within the state of Georgia). The LEA must then await a response from the U.S. Department of Education. If the waiver request is denied, the SEA will inform the LEA of a required reduction to its current year allocation. If the response is favorable, the LEA will be allowed to retain 100% of its current allocation. Documentation to support this process is maintained on file by both the LEA and SEA.

## **4.2 Comparability**

**Evidence that: The LEA is monitoring comparability at least every two years. Georgia requires that LEAs must meet comparability requirements annually.**

Comparability is achieved through the use of two forms of documentation: the October FTE (from the DOE Portal) count and the payroll distribution report (from Business Plus). The state comparability report provided by the Georgia Department of Education is used to report the appropriate numbers to GADOE. The total number of non-federal employees that are to be included per payroll distribution codes are counted and placed in the comparability report also provided by GADOE, which automatically calculates comparability. The enrollment numbers submitted for comparability are from the October FTE count with the exclusion of prekindergarten enrollment. Using the student/instructional staff ratios to compare the average number of students per instructional staff in each Title I school with the average number of students per instructional staff in non-Title I schools, comparability is achieved when Title I school averages do not exceed 110 percent of the average of non-Title I schools.

The LEA Comparability Report is submitted to the Georgia Department of Education via the Web based Title I, Part A comparability application. If the district is not comparable using the online application:

1. Request CPI Reports 12 and 13 (certified staff and non-certified staff) from the Finance department. This is source documentation and must be used for this report. This report is found on the Consolidated Application.
2. Export the names of all staff and set-up spreadsheet to count and compare all staff members at each individual school to staff members counted by GaDOE.. Included in the count are instructional teachers and support personnel, instructional paraprofessionals, music, art, and physical education teachers, guidance counselors, speech therapists, and media specialists. No federally funded personnel, principals, assistant principals, custodians, cafeteria workers, nurses, security, social workers, psychologists or prekindergarten personnel are included in the count; only state and local paid staffs are counted.
3. Seek an additional person to double check staff members.
4. Look at staff that are split-funded and ensure they are counted correctly at each school
5. Go to GaDOE and pull up the latest forms for comparing Title I and Non-Title I schools. The Title I Comparability Report spreadsheet is located under Worksheets on the Title I Web site at: <http://www.gadoe.org/SchoolImprovement/FederalPrograms/Pages/Title-I-Worksheets.aspx>
6. If report shows district comparability, submit to GaDOE area specialist the self-reported the Title I Comparability Report spreadsheet with documentation showing adjustments (including dates of hires or staff reassignment to meet comparability).

If district is not comparable, the Title I Director will seek assistance from GaDOE area specialists and repeat steps.

*Compliance Timeline*

Summer

Run a mock report using attendance and teacher information from data services

October

The district should collect the necessary data to demonstrate comparability as of the October fulltime equivalent (FTE) count day. Request this information from FTE Coordinator around the 1st week in November. It is the October count.

1st Week in November

Title I Comparability Report form must be submitted annually to GaDOE no later than November 15th.

November 15th

If all schools in the district are not comparable as of the October FTE, revise report no later than Dec 31st of the current year.

### 4.3 Assessment Security

#### Assessment Security

**The LEA's test security policy/plan and consequences for violation are made available to local educators.**

The LEA along with the Student Services Department will ensure that all the guidelines are met pertaining to test assessment security. The departments will ensure that the public and local educators are aware of the test security policy/plan and consequences for violation. All issues involving assessment security including security breaches must be reported to the Student Services Department.

#### Test Security Procedures For Richmond County Schools

1. When test shipments are received, they are stored in a secure location until delivered to schools. That location is a locked gated area in the basement of the board office.
2. Tests are inventoried before they are sent to schools.
3. A test delivery team is assembled.
4. This team consists of drivers from the Print Shop, as well as personnel from the Maintenance Department, as needed.
5. Tests are delivered to schools 3-4 days prior to the beginning of the testing window. School test coordinators sign for the tests and are instructed to store them in the vault. Once the tests are counted and verified by the school coordinator, an inventory control is signed, dated and faxed to the Department of Student Services. If there are discrepancies in the count, the testing company is immediately notified.
6. Test Coordinators are required to attend a testing coordinators' meeting prior to each major test during the year. During each test meeting, testing guidelines/procedures, test security, etc. are discussed.
7. Test coordinator sign an agreement after each meeting to acknowledge their understanding of all testing protocols before, during and after the administration of each test.
8. Testing coordinators are also required to re-deliver an in-service to all test examiners in their school. Examiners also sign a similar agreement after attending a school level in-service with their test coordinator.
9. During the testing window, school test coordinators deliver tests to teachers each morning of the test and collect them as soon as testing ends. Verification that all materials are returned is done each day of testing.
10. When tests are returned to the Central Office, the Department of Student Services intake process includes recounting what each school returns to coincide with what was issued to each school.
11. If there are any irregularities during the testing window, schools are required to report to Student Services immediately. Irregularities are entered in the GaDOE portal for instructions on how to handle. (Examples of irregularities: SWD not given correct accommodations, student working ahead in the test booklet, cell phones, etc.)

12. Any lost materials are documented and the person responsible must complete a discrepancy disposition form to explain what happened.

## **RICHMOND COUNTY SCHOOLS**

### **PROCEDURES TO FOLLOW WHEN REPORTING TESTING IRREGULARITIES**

When a *testing irregularity* has occurred, school personnel should:

Put in writing and address to the Superintendent of Schools, with copies to the Assistance Superintendent for your grade level/school and the Director of Student Services, and the school Principal, the following information:

- A detailed explanation of the procedure used in administering the test and the irregularity in question
- An explanation of the procedure to be followed to insure test security and integrity will be maintained in the future

An irregularity refers to any variation from the procedures for administration as outlined in the School Coordinator's Manual and/or the Examiner's Manual. School personnel refer to the Principal, Teacher (Examiner) and School Test Coordinator. **A separate statement from each person involved is required.** A decision to inform the Georgia Department of Education Assessment Division will be made by the Superintendent. Please be reminded that all testing activity is extremely important as numerous decisions are linked to test results in Georgia. The validity of the test and the credibility of our school system will be greatly compromised by failure to adhere to written administration policy.

When a *test item has been lost* and cannot be located, school leadership personnel should:

- Have the person responsible for the loss to list on the bottom of the inventory control form the exact name of the material(s) missing and quantity involved and sign in the appropriate space
- Put in writing the activities / procedures:
  1. utilized in attempting to locate the missing item(s) and;
  2. to be followed in the future to insure test inventory and send to the Director of Student Services, along with copies to the Testing Coordinator, the Principal, the Assistant Superintendent for Curriculum and Instruction and the Superintendent of Schools

The loss of test items is a very serious matter. Be advised that personnel in the Assessment Division of the Georgia Department of Education **must be notified** of any lost test items. Loss of test items and breaches of test security jeopardize test validity and the credibility of our school system.

#### **LEA's test security policy/plan and consequences for violation**

#### **Security Breaches**

Any action that compromises test security or leads to the invalidation of an individual student's

or a group of students' test scores will be viewed by the Georgia Department of Education (GaDOE) as inappropriate use or handling of tests and will be treated as such. Any concern regarding test security must be reported to GaDOE immediately. Assessment Administration Division staff members are available to help system personnel develop and implement appropriate test security procedures.

It is a breach of test security if anyone performs any of the following:

- ☐ coaches examinees during testing, or alters or interferes with examinees' responses in any way;
- ☐ gives examinees access to test questions or prompts prior to testing;
- ☐ copies, reproduces, or uses in any manner inconsistent with test security regulations all or any portion of secure test booklets;
- ☐ makes answers available to examinees;
- ☐ reads or reviews test questions before, during (unless specified in the IEP, IAP, or ELL/TPC), or after testing;
- ☐ questions students about test content after the test administration;
- ☐ fails to follow security regulations for distribution and return of secure test materials as directed, or fails to account for all secure test materials before, during, and after testing (NOTE: lost test booklets constitute a breach of test security and will result in a referral to PSC);
- ☐ uses or handles secure test booklets and answer documents for any purpose other than examination;
- ☐ fails to follow administration direction for the test.
- ☐ participates in, directs, aids, counsels, assists, encourages, or fails to report any of these prohibited acts.
- ☐ Erases, marks answers, or alters responses on an answer document.

Failure to safeguard test materials or to comply with test administration procedures could adversely affect an individual's certification status. Such practices must be reported to the GaDOE and may be referred to the Educators Ethics Division of the Professional Standards Commission as failure to adhere to established policies and procedures.

Under no circumstances may any tests be reproduced or duplicated for individual or group use unless authorized by GaDOE. Failure to comply with the U.S. Copyright Laws protecting these materials could result in legal action. Any instance of violation of copyright laws must be reported immediately to the GaDOE.

### **Written procedures/plan for training and monitoring assessment administration conditions across the LEA**

Principals within the LEA assign a testing coordinator for their respective schools. A district wide meeting is conducted by the District Level Coordinators of Student Services to deliver testing information from GaDOE. School level testing coordinators redeliver training materials and procedures to all certified and classified staff members of their schools.

Each school's testing coordinator is responsible for the following:

- ☐ Receives test materials from System Test Coordinator and verifies numbers received.
- ☐ Determines the number of booklets to be assigned to each testing site and accounts for material distribution and return.
- ☐ Prepares all testing sites.
- ☐ Assists Principal in assigning Examiner(s)
- ☐ Assigns Proctors appropriately in accordance with state guidelines.
- ☐ Accounts for the security of all test materials during the time the materials are in the building.
- ☐ Ensures all materials are stored in a secure, locked location with restricted access. Confirms access is restricted by accounting for keys.
- ☐ Conducts orientation and training sessions for Examiners and Proctors.
- ☐ Adheres to system testing schedule.
- ☐ Distributes test materials to and collects from each Examiner on the testing days.
- ☐ Ensures Examiners sign out (date and time) materials each testing day shortly before testing begins each day.
- ☐ Ensures Examiners return (sign, date, and time) materials immediately after testing each day.
- ☐ Provides each Examiner with a list of student FTE and GTID numbers.
- ☐ Accounts for all students in terms of testing requirements.
- ☐ Notifies Principal and System Test Coordinator of any emergency situation and helps to decide what action needs to be taken.
- ☐ Coordinates and supervises inspection of all completed answer documents before delivering them to the System Test Coordinator.
- ☐ Counts materials returned from Examiners each day and accounts for all materials distributed each day of testing.
- ☐ Packages and returns materials to System Test Coordinator according to directions and time line.
- ☐ Notifies Principal and System Test Coordinator of any testing irregularities and provides explanation of circumstances.
- ☐ Maintains dated student sign-in/sign-out sheets for each administrator.
- ☐ Ensures that students have only one opportunity to test during each window.
  
- ☐ Ensures that for any students not currently enrolled in their local school, the following protocol is applied:
  - ☐ contacts student's schools for verification of test eligibility
  - ☐ requires photo ID and maintains photocopy record
  - ☐ The decision to test out of system students is a local one. The burden of identification, establishment of eligibility, and record-keeping ensuring score reports are returned to the appropriate school must be borne by the administering school/system

**Written procedures/plan for test materials distribution and test materials return. Written procedures/plan for addressing data quality issues related to assessment and accountability**

District Level Test Coordinators and Staff organize a schedule for School Level Test Coordinator to receive and return materials. During the process, test items are inventoried and counted to account for test items being distributed and received. Signatures are obtained from the School Level Test Coordinator and District Level Staff during the process.

**SCHOOL LEVEL POST-TEST ACTIVITIES: School Test Coordinator shall:**

- Under administrator supervision, review answer documents
- Where applicable, verify that the demographic and coding information is correctly gridded
- If instructed by the System Test Coordinator, complete Local Option Coding
- Complete *For Teacher Use Only*
- Notify School Test Coordinator if there is a need to transpose student responses from a test book onto an answer sheet
- Complete Group Information Sheets (GIS)
- Inventory scorable and non-scorable materials separately
- Verify that Test Examiners have returned all materials
- Complete the School Security Checklist and place in the first box of Scorable materials

- Verify that *VOID* is written across every voided Test booklet and Answer Sheet; return voided documents with non-scorables
- Verify that each GIS is filled out correctly
- Complete the School/Group List (SGL)
- Arrange all scorable documents with the student name face-up
- Secure each classroom's scorable materials with a paper band using a Stack Cover Card for each bundle and a Group Information Sheet for each class
- Use original shipping boxes for return shipment; if additional boxes are required, notify the System Test Coordinator to order them through CTB Customer Service
- Pack scorable and non-scorable materials separately
- Account for all scoreable and non-scoreable materials then concentrate on processing scorable materials for return for scoring.
- All non-scorable materials must be returned to the System Test Coordinator within one week of the last day of the system's scheduled test window
- Improper packaging may delay your score reports; detailed instructions are provided in the *After Testing* section of the TCM
- Special care not to mix CRCT and CRCT-M materials

So that districts are prepared to address *non-participants* during Accountability processing note:

- Collect by school and by subject: the names of each student who should have tested but was a non-participant
- Categorize their *non-participation* as one of the following four *choices*: *Medical Emergency, Illness, Other, or Unknown*

Transposing Student Answer Responses:

- When required and prior to returning answer sheets to the System Testing Coordinator, verify student answer responses have been transposed to an answer sheet.
- Transposing should be witnessed by a certified educator. If only two people are present one must be an administrator.

## TEST COORDINATOR'S AGREEMENT

Subject: **Georgia Milestones EOG Assessment 2015**

My signature below verifies that I have read, understand, and agree to the following:

I understand that:

- I am responsible for the security of tests issued to me;
- I am not to distribute test materials prior to the morning of administration;
- I must immediately report any irregularities or problems that may occur during the administration of the test and any other time while the tests are in my building. If I lose materials, I will write a letter of explanation to my principal and the Superintendent of Richmond County Schools.
- Special coding and accommodations are required for IDEA students (when applicable) and I will ensure that they are coded correctly;
- I must meet with *test examiners and proctors (if applicable)* prior to testing to discuss testing procedures;
- I am to closely monitor the administration of the test to ensure that all procedures are followed;
- I must follow the proper procedure for reporting lost or missing test materials; (as outlined in the "Procedures To Be Followed When Reporting Lost Test Materials);
- That failure to comply with these guidelines could result in a report to the Professional Standards Commission (PSC) and an investigation into the circumstances and issues involved therein; and
- I must return tests to my system coordinator in a timely manner.

---

Signature of Test Coordinator

---

Date

---

School

\* To be signed and dated immediately following the testing workshop.

## **TEACHER’S AGREEMENT**

My signature below verifies that I attended a workshop at my school.

### **Subject: Georgia Milestones EOG 201**

I understand that:

- I am responsible for the security of tests issued to me;
- I am not to distribute test materials prior to the morning of administration;
- I must immediately report any irregularities or problems that may occur during the administration of the test and any other time while the test is in my possession. If I lose materials, I will write a letter of explanation to my principal and the Superintendent of Richmond County Schools.
- I am responsible for the completion and verification of information and special coding on answer documents
- accommodations that are required for IDEA students (when applicable) and have been carried out;
- I am to closely monitor the administration of the test to ensure that all procedures are followed;
- I must follow the proper procedure for reporting lost or missing test materials; (as outlined in the “Procedures To Be Followed When Reporting Lost Test Materials”);
- that failure to comply with these guidelines could result in a report to the Professional Standards Commission (PSC) and an investigation into the circumstances and issues involved therein.
- I must return test in a timely manner.

---

Signature of Teacher

---

Date

## Richmond County Board of Education

### Examiner's Certification Adherence to Prescribed Test Administration Procedures

Check appropriate response and explain any problems relating to security or administration procedures, which may have occurred. Use an additional sheet as necessary.

YES NO

- ( ) ( ) 1. Information in the *Examiner's Manual* was reviewed and followed exactly during the testing sessions.
- ( ) ( ) 2. All Testing Materials were carefully counted when received. Any discrepancies were reported to the School Test Coordinator and were successfully resolved.
- ( ) ( ) 3. All testing materials were kept in a secure location while in the examiner's possession and no one was allowed to record, copy or make a conscious mental note of any testing item, answer documents and/or student responses.
- ( ) ( ) 4. All procedures for testing as given in the *Examiner's Manual*, including reading of all directions to students word for word, were followed.
- ( ) ( ) 5. No student left the room during a testing session. If an emergency situation did necessitate a student's leaving, an explanation can be found on the back of this sheet.
- ( ) ( ) 6. Proper classroom control was maintained and students were on task during the testing period.
- ( ) ( ) 7. While students were assisted with procedural aspects of the test, no assistance was offered which could have influenced a student's response to any test item.
- ( ) ( ) 8. All answer documents were inspected, and all demographic information was completed as required.
- ( ) ( ) 9. The use of reference materials was not allowed unless specified in the *Examiner's Manual*.
- ( ) ( ) 10. A roster of students was maintained and turned in to the School Test Coordinator along with an answer document for each student taking all or part of the test.
- ( ) ( ) 11. All testing materials issued were returned to the test coordinator.

School \_\_\_\_\_ Test Georgia Milestones End-of-Grade

Examiner's Signature \_\_\_\_\_ Date \_\_\_\_\_

Test Coordinator's Signature \_\_\_\_\_ Date \_\_\_\_\_

Principal's Signature \_\_\_\_\_ Date \_\_\_\_\_

## **Section 5**

### **5.3 The LEA's written internal control procedures that are designed to provide reasonable assurance regarding the achievement of objectives in the following categories:**

- (a) Effectiveness and efficiency of operations;**
- (b) Reliability of reporting for internal and external use; and**
- (c) Compliance with applicable laws and regulations.**

Schools are notified to expend funds once the GADOE approves the budget. All purchases are verified by the Title I Budget Manager and Title I Program Specialist, before the Title I Director approves the purchase. Purchases must be allowable, reasonable and necessary for accomplishing the objectives of the program and for implementing activities as described in the funding application.

Equipment, materials, and supplies are approved if 1) necessary to operate Title I, Part A programs effectively, 2) existing equipment will not be sufficient and 3) the costs are reasonable and 4) allowable under Title I, Part A regulations 5) acquired/consumed specifically for the purpose of the Title I, Part A. The school and LEA must document the details and location of the equipment and the reason for the purchases. All materials and all services must be provided or delivered in time to benefit substantially the population being served in the current grant period (30 days of the ending date of the grant and in no case after the ending date).

Travel and conference costs are allowable if specifically related to the Title I, Part A program and are reasonable and necessary.

Prior approval must be obtained from the Title I Director before making Title I purchases, contracting services or attending conferences. Reimbursements are issued after adequate paperwork is received.

Purchases and services are completed using easyPurchase, requisition forms or contracts.

The following procedures are followed to ensure proper use of federal funds after budgets are approved by the Title I Director and DOE:

#### **Purchase Orders (eschool Mall)**

Schools submits orders (materials, technology, some hotels) in easy purchases for approval. The school's bookkeeper and principal must approve orders before they are electronically delivered to the Title I office.

Title I Budget Manager checks to see if money is allocated in the budget and enters the account number.

The Budget Manager sends it to the Title I Director for review and to make sure it's allowable, reasonable, and necessary. The Title I Director distributes the budgets to the Title I Title I Program Specialists to ensure that expenditures are included in the SWP/SIP/TA plan.

If the purchase is allowable, reasonable, and necessary, the Title I Director approves the orders and submits it to the Purchasing Department. Purchases that are not reasonable, allowable, and necessary or not a part of the needs assessment are rejected with an explanation and technical assistance is given to the school to an adequate purchase. The Purchasing Department approves and releases a P.O. to vendors. The Business Plus system allows the Title I bookkeeper to view all approved orders and payments. Once the school receives their materials, the bookkeeper verifies orders in EasyPurchase. The Accounts payable department handles all payments.

Once the school receives their materials, they verify by entering 'received' in easypurchase. The Title I Bookkeeper reviews the orders in easypurchase system and closes out orders once items are received at the school. A message is sent back to the Purchasing Department so payment can occur.

### **Blue Requisitions**

Blue requisitions are only used in RCSS for hotel payments, registrations, departmental bills, pay consultants.

- The blue requisitions are submitted from the schools with the principal's signature to the Title I Department Budget Manager for verification of funds in the school's budget.
- The Title I Budget Manager sends the requisitions to the Title I Bookkeeper for posting. The Title I Bookkeeper sends the requisitions to the Title I Director for signature.
- The Title I Director distributes the blue requisitions to the Title I Title I Program Specialists to ensure that expenditures are allowable.
- The Title I Director returns the blue requisition to the Title I Bookkeeper for copying and distributing.
- Items are forwarded to Account Payable Supervisor or payments
- Each check run is preapproved by the Controller and signed by the Superintendent

**5.3d Expenditure detail reports for all completed expenditures related to ELP, Title III and Immigrant including, but not limited to, transportation, payroll history for ELP instructors, time sheets for ELPs tutors, equipment and instructional materials/supplies, administrative costs charged to ELP.**

**5.3 e. Evidence of procurement and rationale of contractual service complies with applicable policies, procedures and regulations, and performance/deliverables.**

- 1. Copy of signed contract.**
- 2. Performance/deliverables must be verifiable.**

Contracts are required for all consultants and purchased services. Specific duties are specifically spelled out for each contract. The contract includes the number of hours to work, the rate of pay, travel costs, description of workshop, and evaluation of student achievement. The consultant agreement is signed by the Contractor, Principal, Title I Director, and Assistant Superintendent.

Additional information for the compensation for consultant work is attached.

Consultants are paid when schools verify the work is complete. Artifacts include agenda, sign-in sheets, and ‘proof of service’ form. The Title I Director signs off on the blue requisition before of payment is issued. All documents are kept on file in the Title I office.

Tutors (working with students)

All schools requesting a tutor must complete the Title I Tutor Packet:

- Title I Tutor Overview
- Title I Tutor Consent form
- TRS Retiree Return to Work Request Form: if Tutor is a TRS retiree
- TRS Maximum Part-time Hours – keeping it at 49% (if not a TRS retiree, hours worked cannot exceed 120 per *calendar month*)
- Title I Payroll Table
- Title I Time Log

All tutors must be approved by the Title I and Human Resource Departments.

Before tutors receive payment, principals must submit the tutoring time logs based on the payroll deadlines from the Payroll Department along with student attendance and academic performance.

**5.3 f Written financial and program policies or procedures that ensure internal controls, including segregation of duties; ensures accountability; appropriate authorization; and compliance with all applicable laws and regulations.**

**Richmond County Internal Control Plan is located at**

**<http://www.rcboe.org/cms/lib010/GA01903614/Centricity/domain/4510/forms/Internal%20Control%20Policy%203.31.16.pdf>**

Internal control is a key element necessary to the effective financial management of the Richmond County Board of Education. Effective internal controls ensure that the district's resources are used in a manner consistent with federal, state, and local regulations and policies. It is essential to sound financial practices and minimizes the risk of fraud, abuse, or misuse of the district's assets.

This document communicates the Internal Control Plan for the Richmond County Board of Education, Augusta, Georgia. The purpose of this plan is to state the procedures that are to be used by the school district's employees to ensure all assets are properly safeguarded against improper use. The objectives of this plan are to ensure that transactions are properly authorized, a sufficient segregation of duties exists where significant loss may be incurred, access to school district assets are safeguarded, and the internal control plan is monitored and reviewed at least annually.

The Business Plus accounting system provides separate accounting for each federal program which allows easy access for all federal programs. To ensure appropriate segregation of duties, expenditures are authorized by the Director of Finances and Accounting and processed through the system by the accounting department. Cash drawdowns are performed by the Director of Finances and Accounting. Grant funds that are used for personnel are monitored separately through payroll and monitored by each director.

This plan consists of the following five components:

- Control Activities
- Control Environment
- Information and Communication
- Risk Assessment
- Monitoring Control Activities

### **Control Activities**

The Richmond County School System uses the Business Plus Accounting System. The system provides for separate accounting of non-federal and federal funds. The system allows schools to enter orders electronically. At the school level, the orders are approved by the principal, then submitted to the Title I budget manager who forwards it to the Title I director. Although, the director is responsible for approving any requests for purchase orders and requests for payment, program specialists review requests to ensure they are aligned with the school's needs assessment. The director's signature validates approval. The Director and Budget Manager review the orders for accuracy to assure that they are in line with OMB Circular A-87 requirements and the approved budgets. The Title I Director approves with a signature and requests are forwarded to the purchasing office for processing. In May 2016, the Director of Purchasing retired and the department merged under Budget and Finance; therefore, as of July 1, 2016, the Director of Budget and Finance or Purchasing and Accounts Payable Manager approves the voucher package and any bids or contracts involved. All of these individuals are aware of the allowable costs.

There is no Board policy relative to administering payroll distribution to this federal program as well as other federal programs administered by the Board. However, for this major federal program, the following procedures are followed to meet OMB Circular A-87 requirements:

Professional personnel are paid monthly based on the amount of their annual contract with the Board. A semi-annual Certification form is required for this major federal program (or single schoolwide program). The Periodic Certification lists all personnel at a site/school and is signed by the supervisor and the Title I Director. Submission is required within 15 days after the end of the semi-annual period. The Title I Director keeps a master checklist to assure that a Semi-Annual form is submitted by all professionals on the due dates. If the Title I Director finds that the professional expended less than full-time on the program, then the Title I Director notifies accounting office that an adjustment needs to be made to the salary charged to the Title I program based on the actual time expended by the professional.

For those professionals that work on the Title I federal program as well as on another federal program and/or other Board duties, the Board requires that these personnel complete a Personnel Activity Report (PAR) and submit such within ten days after the end of each month. Upon receipt, the employee's supervisor reviews them for accuracy and, upon approval, will initial the PAR. The Title I Director also reviews these PAR's. If the PAR shows that actual time expended on the Title I federal program differs from that amount budgeted for the program, the Title I Director notifies the accounting Department and adjustments are made to the salary amount charged to the Title I federal program for that period. The Title I Director keeps track of all the PAR's submitted monthly to assure that a PAR is submitted by each professional. If a professional does not submit a PAR, then

an email is issued to the professional as a reminder to submit a PAR. The Title I Director will continue to follow-up with the employee until a PAR is submitted.

### **Information and Communication**

The Title I budget manger generates a Revenue and Expenditures Report that shows a comparison of budget to program expenditures occurred during the past month and on a cumulative basis. The Title I Director and staff meet monthly to discuss any issues relating to the conduct of the program. The Title I Director is also in constant contact with the GaDOE regional program technical staff for any needed technical assistance. Any program changes issued by GaDOE are electronically communicated directly to The Title I Director from GaDOE. The Title I Director advises other appropriate Central Office personnel of any program or administrative changes that may affect their responsibilities. The Title I Director also holds weekly staff meetings to disseminate information received from the DOE Title I Department. Employees are encouraged to report any suspected irregularities to the director. All Central Office personnel who are involved in the conduct of this and any other federal Program are well aware of the penalties involved with the misuse of federal funds and assets. Signatures are kept on file to serve as evidence that the LEA disseminated procedure for reporting fraud, waste, abuse and corruption of Federal funds. The Title I Director keeps a copy of the Title I federal Program Handbook issued by GaDOE and OMB Circular A-87 in her office files.

### **Monitoring**

The Program Specialists assist schools in developing their budgets to make sure that the funds are utilized to develop instructional strategies, implement requirements for parent and family engagement , identify effective professional learning, and analyze and revise school's budget to make sure that the resources are allocated effectively. The budgets are checked and reviewed by the entire Title I Department and if an item on the budget is not allowable or is not aligned to their school improvement plan, it is returned to the school and technical assistance is offered. Schools are also given guidance for amendments for any changes that are unforeseen.

1. Funding amounts are approved by the GaDOE Board of Education
2. Award letters are sent to districts
3. Schools are given the allocated dollar amount for budgeting and work with the school's leadership team and area superintended to develop the school level budgets
4. Budget and justifications of allocations are sent to the Title I Program Specialist and Title I Director
  - a. All allocated items must be a part of the SWP/SIP/TA plan.
  - b. Items must be justified by the needs assessment. Items must have direct link to the academic achievement of students.
  - c. Funds requested must be only for those items that are reasonable and necessary for accomplishing the objectives of the program and for implementing activities as described in the funding application.
    - i. Reasonable costs are defined as those costs that are consistent with prudent business practice and comparable to current market value.
    - ii. Necessary costs are those costs that are essential to accomplish the objectives of the grant project.
    - iii. All items requested must be allowable expenditures under the authorizing program statutes, regulations, and rules allowable under Title I, Part A statute.
    - iv. All materials and all services must be provided or delivered in time to benefit substantially the population being served in the current grant period (30 days of the

- ending date of the grant and in no case after the ending date).
- v. Equipment is allowable if 1) necessary to operate Title I, Part A programs effectively, 2) existing equipment will not be sufficient and 3) the costs are reasonable. The LEA must document the details and location of the equipment and the reason for the purchases.
- vi. Travel and conference costs are allowable if specifically related to the Title I, Part A program and not to general needs of the district or campus and are reasonable and necessary.
- vii. Supplies and educational materials are allowable if reasonable and acquired/consumed specifically for the purpose of the Title I, Part A program. The district must document the details and location of the supplies and the reason for the purchases
- d. Budgets found to have items that are not reasonable, allowable, necessary or not part of the needs assessment are rejected with an explanation and technical assistance is given to correct the budget.
- 5. Approved budgets are entered into the GaDOE Consolidated Application (electronic grant application process) by the Title I Budget Manager.
- 6. 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).
- 7. After the budget is approved by GaDOE, schools are notified.

The Title I Director and the Budget and Finance Director monitor the Title I Budget using the Statement of Income and Expenditure Reports generated within the Business Plus Accounting System. Discrepancies that are identified through the monitoring process are investigated and corrected. The status of the Title I program is discussed at board meetings which are held monthly. The Board has no internal audit function that reviews Title I.

### **Control Environment**

The Board has established a reasonable federal and non-federal budget to properly administer this program and discourages miscoding of expenditures. Through a purchasing policy that is available to employees, it is evident that the board stresses the need to properly code expenditures. The Title I Director and the Budget and Finance Director are well aware of the need to provide separation of allowable federal versus non-federal costs. Board management has employed knowledgeable and experienced personnel to administer this federal program and the appropriate management support to do so.

## **CASH MANAGEMENT**

### **Risk Assessment**

The Budget and Finance Director is responsible for drawing down the funds for the Title I federal program. The Budget and Finance Director is well acquainted with the process for requesting funds. The Title I Director reviews the drawdown requests and is also familiar with the drawdown process. GaDOE's process for requesting

federal funds has been in place for many years with no changes. There are no sub recipients that receive these funds.

### **Control Activities**

The Budget and Finance Director is responsible for drawing down funds each month. The Statement of Income and Expenditures reports from the Business Plus Accounting System for Fund 402 provides the actual Title I funds expended. These reports can be generated at any time in the Business Plus Accounting system to reflect the cash needs of the federal program.

The Budget and Finance Director consults with the Title I Director about any unusual expenditures that are to be expected early in the following month. Based on actual expenditures, she formulates the amount of funds to be requested. The Title I Director reviews the drawdown; the Budget and Finance Director submits it electronically to GaDOE using the Grants Accounting Online Reporting System (GAORS).

After approving requests, GaDOE directly deposits the funds into the Board's operating bank account and are then recorded in the respective federal fund. The amount deposited into the operating account is compared to the amount requested by grants accountant and any variances are investigated.

### **Information and Communication**

Both the Budget and Finance Director and the Title I Director are familiar with "Financial Management for Georgia Local Units of Administration" which provides guidelines for requesting funds from GaDOE. A copy can be accessed through GaDOE website.

The monthly amount deposited into the operating account is compared to the amount requested by the Board. Variances between the actual cash disbursement of funds and draw down of federal funds are reviewed by the Budget and Finance Director and the Title I Director.

### **Monitoring**

On a monthly basis, the Budget and Finance Director performs an informal review of federal program fund accounts to assure that the amount of federal funds requested are properly posted to the federal program's account. Also, federal fund balances are checked throughout the month to assure that funding levels are appropriate and to ascertain if fund balances are low or excessive. The Budget and Finance Director or the Title I Director follows up on any problems noted in the cash management process.

The Title I Director follows the Richmond County Schools Cash Management procedures:

Decisions are made in accordance with the federal cash management guidelines as well as the specific regulations denoted in 29 CRF.20, 21, and 22.

The majority of the money received by the school district is handled via Electronic Funds Transfers and Automated Clearing House payments.

Cash and checks received by the district are deposited on the day of receipt.

Funds for state and federal grants must be requested based upon actual expenditures. For federal grants that operate on a reimbursement basis, requests for funds are made based upon the actual payment of cash

transactions and are drawn monthly after approval of the grant is received. For other draws, the requests are made so that the funds received will be disbursed within three business days.

Tax collections are deposited by the Tax Commissioner's office once a week using a cash vault with SunTrust and Wells Fargo.

Vendor payments are primarily processed weekly although some travel checks and discount payments may be processed more frequently.

### **PURCHASE ORDER INSTRUCTIONS**

Purchase Orders should be entered through EasyPurchase. Vendors not listed in the drop down catalog may be found under 'Non-Catalog Items'. If the vendor is not under 'Non-Catalog Items' you will need to email the Purchase Order Processor assigned to your school after verifying that the vendor accepts RCSS purchase orders.

The following information is required to set up vendors:

- Vendor Name
- Address
- Phone Number
- Fax Number
- Contact Person (If available)

When sole source applies please send a current letter from the vendor stating that the exact items being ordered are sole source only from that vendors company. Purchasing verifies sole source justifications periodically.

Contact the Purchase Order Processor that is responsible for your school at (706) 826-1113 with questions concerning requisitions and purchase orders.

### **OPEN MARKET PURCHASING:**

All schools and departments may make purchases not to exceed five hundred dollars (\$500) without competitive quotations. Such purchases should be distributed equitably among qualified suppliers. When practical, prior to placing a repeat order, a quotation should be solicited from a vendor/supplier other than the previous supplier.

### **SCHOOLS:**

All purchases between five hundred (\$500) and three thousand dollars (\$3,000) must have a minimum of three (3) documented quotations. The quotations can be made through EasyPurchase or by telephone, fax or email. When an order is needed from a source that is not on EasyPurchase, notify the Purchasing Department to add the vendor/supplier. Maintain a vendor list and rotate among them.

A purchase of homogeneous items which cost three thousand dollars (\$3,000) or more must be bid out through the formal bid process. The only exceptions to this policy are "sole source" providers, State of Georgia contract pricing or purchases made under a current bid. If a school needs to make a purchase over \$3,000 that is not on

State contract or sole source, contact the funding source or the Purchasing Department for clarification or advisement.

#### DEPARTMENTS:

All purchases between five hundred (\$500) and seven thousand five hundred dollars (\$7,500) must have a minimum of three (3) documented quotations. The quotations can be made through EasyPurchase or by telephone, fax or email. When an order is needed from a source that is not on EasyPurchase, these quotations may be requested by telephone, fax, or email. When practical, the same vendor should not be utilized each time. Maintain a vendor list and rotate among them.

#### “SOLE SOURCE” PROCUREMENT:

Sole Source purchases are discouraged as a method for procuring goods and services. An exception to the Open Market Purchasing rules for both schools and departments is the “sole-source” procurement. A “sole-source” supplier is the only acceptable vendor who has the ability to furnish a certain product or service. In cases where a product is available from only one prime source, and not merchandised through wholesalers, retailers, or other intermediaries, the Purchasing Department will review sole source rationale to prevent policy violations.

A Sole Source letter must accompany Sole source purchase request(s). Consider the following criteria prior to submitting a Sole source purchase request.

- Only one supplier can satisfy the technical requirements of this purchase.
- Only one supplier possesses the patents or exclusive rights to manufacture or to furnish the item or service (all items on the requested purchase request).
- Only one supplier can furnish the services because of the supplier’s previous Richmond County School System experience and having an alternative source would result in excessive cost to the Richmond County School System.

All items on the requisition must be sole source.

Sole Source requests will be returned to the originator if at minimum the above listed criterion is not met.

A current Sole Source letter is required for each request and is only valid for one calendar year period.

**Note: Textbook purchases are considered an academic prerogative, therefore can be purchased from any source.**

#### FORMAL BID PURCHASING:

A purchase of one item or a purchase of homogeneous items which cost three thousand dollars (\$3,000) or more for schools and seven thousand five hundred dollars (\$7,500) or more for departments must be bid out through the formal, advertised, sealed bid process. In order to process requests for major purchases, Richmond County School System departments and schools should contact the Business Office at (706) 826-1298. The Business Office will advise based on the formal bidding process.

#### BID PROCESS THROUGH EASYPURCHASE:

- When creating a bid on EasyPurchase, contact the Business Office for a timeline for newspaper advertisement, due date for specifications, etc.

- Develop the bid through EasyPurchase. Technical specifications will be needed for each item requested – to include size.
- The bid should be reviewed by the school principal or department head.
- Forward an email to the Business Office. Indicate the Bid ID# and indicate that the bid is ready for distribution to the appropriate vendors.
- After the bid opening date and time, an award report can be printed. It will outline the lowest bid per item or package along with all vendor responses.
- Create a tally sheet and exception letter if necessary.
- Submit the tally to the Business Office for distribution to the Board Members.
- Once bid bonds, when required, are received by the Business Office requisitions can be created.

#### PROCESS FOR PLACING ORDERS FOR BIDS AWARDED THROUGH EASYPURCHASE:

In some cases after a bid is awarded, requisitions will be created in the Business Office, and the requisitions will go to the person who created the bid.

- Review requisition for accuracy. Enter all required information on the requisition i.e. requisition name, justification, account number, note changes or additions, then submit through appropriate approval route in EasyPurchase.
- The requisition will go through all approvers in the route with the final approval from the Purchasing and Inventory Control Department.
- Purchasing will generate a purchase order. If the vendor is set up to electronically receive purchase orders, the purchase order will automatically be transmitted. If the vendor is not set up to receive electronic purchase orders, the purchase order will be mailed out by the Purchasing Clerk unless the user has indicated all paper work be returned to them.
- The vendor will deliver and install (if necessary) all items ordered to the address indicated on the requisition/purchase order. If the items are not correct, they should be returned to the vendor and not accepted at the time of delivery.
- The school or department submitting the request(s) is to inspect the item(s) upon delivery. If items are received completely and in accordance with bid specifications, go to EasyPurchase Receive Tab and close out the purchase order. If the items are not correct, they should be returned to the vendor and not accepted at the time of delivery.

Payments for construction projects are processed monthly once the management company, Hanscomb GMK, has reviewed the invoices. The school district awards its banking business on the basis of a request for

proposal. To obtain the best arrangement for the school district as a whole, each bank is requested to bid on all bank accounts and school bank accounts collectively and individually. The current banking arrangement has no associated fees. Interest is earned on 100% of the bank balance without consideration of a 10% holdback for transactions in process. The most recent bank bid was effective beginning July 1, 2013 with a 5 year extension clause.

Bank cash is reviewed daily via an online Treasury Manager. An analysis of bank costs offset by interest earnings is performed monthly. This assists in determining the most appropriate vehicle for investment. Monies received for sales tax collections are handled on a 5 year bid proposal. Presently, a tri-party agreement through the Bank of New York determines the investment of sales tax proceeds. Funds to pay construction bills are drawn on an as needed basis, usually monthly. Proceeds remaining from prior sales tax collections are invested either in the Georgia Fund 1 or Suntrust Bank.

### **Control Monitoring**

The Board has assigned sufficient knowledgeable personnel to manage the drawdown of federal funds. Those who handle cash management responsibilities are familiar with GaDOE's guidelines and procedures for requesting federal funds. The Board's process of requesting funds from GaDOE appears to be realistic with the federal program's cash needs.

## **ELIGIBILITY**

### **Control Activities**

The Title I Director and the Title I Budget Manager determine eligibility each year. The following information is used to calculate the poverty percentages for each school: the October FTE counts and Directed Certified Report data from the Temporary Assistance for Needy Families program ("TANF") and the Supplemental Nutrition Assistance Program ("SNAP"), which is validated by the Director of School Nutrition.

From the October FTE and the number of direct certified students, all school attendance areas (the geographic area from which a public school draws its children) are ranked according to their percent of poverty. Section 104(a) of the Healthy, Hunger-Free Kids Act of 2010 ("Act") amended section 11(a)(1) of the Richard B. Russell National School Lunch Act provides an alternative that eliminates the need for household applications for free and reduced-price meals in high poverty LEA's and schools. This alternative, which is now part of the NSLP, is referred to as the Community Eligibility Provision.

The same lunch poverty data, which identifies children eligible under the Richard B. Russell National School Lunch Act, is used for:

- Identifying eligible school attendance areas and ranking them by percentage of low-income children counted rather than the number counted.
- Determining the ranking of each area.
- Determining the allocation for each area.

All schools are ranked in order from highest to lowest percentage poverty and the School System must first serve, in rank order of poverty, its areas above 75% poverty, including any middle schools and/or high schools.

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

- The same districtwide poverty average must be used if the School System selects option (1).
- For ranking by grade span groupings, the School System may use (1) the districtwide poverty average or (2) the districtwide grade span poverty averages for the relevant grade span grouping.
- If a School System has no school attendance areas above 75 percent poverty, the School System may rank its schools districtwide or by grade span groupings.
- A School System's organization of its schools defines its grade span groupings. For example, if a School System has elementary schools serving all elementary grades, middle schools, and high schools, the grade span groupings would be grades K to 5, 6 to 8, and 9 to 12. To the extent a School System has schools that overlap grade spans (e.g., K to 5, K to 8, 6 to 8), the School System should include a school in the grade span in which it is most appropriate.

### **Information and Communication**

All GaDOE Guidelines and USDOE guidelines regarding eligibility are kept in the Title I Director's office. All Title I personnel have access to these guidelines. The Title I Director and Title I Budget Manager work closely together and discuss eligibility requirements frequently when preparing the Title I Consolidated Application.

### **Monitoring**

Once the Title I schools are determined based on rank order, Title I Program Specialists are assigned to monitor the schools. The Program Specialists assist with the school's needs assessment, writing a schoolwide plan and creating a budget. The Program Specialists report to the Title I Director any irregularities in the schools.

### **Control Environment**

The Title I Director and the Title I Budget Manager have the necessary training and skills to perform eligibility determinations for schools. Levels of authority and responsibility are clear in making eligibility determinations. The staff adequately handles the eligibility case load. Federal guidelines and GaDOE policies included in GaDOE Handbook are readily available to staff.

## **FINANCIAL REPORTING**

### **Control Activities**

The Budget and Finance Director prepares the completion report for Title I using the Statement of Income and Expenditure Reports from the Business Plus Accounting system. These reports are snapshots of the general ledger showing revenue and expense by function and object. After reviewing these reports, the Budget and Finance Director coordinates with the Title I Director to ensure the amounts are correct. Once the Title I Director agrees to the amounts, the Budget and Finance Director prepares the completion report through GAORS online by the required deadline.

### **Information and Communication**

The Budget and Finance Director is acquainted with GaDOE's requirements for annually reporting expenditures on the completion report.

The Budget and Finance Director is familiar with GaDOE's guidelines for accounting and reporting as contained in Chapter 41 of Financial Management of Governmental Local Units of Administration (LUAS) Manual.

### **Monitoring**

The Budget and Finance Director is responsible for following up on any problems or weaknesses in internal controls that may relate to financial reporting to GaDOE.

### **Control Environment**

The Board's management promotes accurate and fair presentation in its financial reporting. Those responsible for preparing and reviewing the completion report possess the required knowledge, skills and experience. The responsibility and delegation of authority of the Budget and Finance Director in completing, reviewing and submitting the completion report is appropriate.

## **MATCHING, LEVEL OF EFFORT, EARMARKING**

### **Risk Assessment**

The Title I Director has 22 years of experience in education. She has served as Director since July 2015 and has eight years of experience in the Title I Department. The Budget and Finance Director has been in her position for about two years. The Board has administered this federal program for many years and they are well acquainted with MOE requirements and the annual amount of State and local (non-federal) expenditures that are needed by the Board to support this federal program. The Budget and Finance Director has sufficient understanding of the Board's accounting system so if there are any accounting/data entry/recording issues, she would be able to identify those that may affect the Board from meeting its MOE requirements.

### **Control Activities**

The Title I Director ensures that all expenditures relating to Title I are supplementing local funds rather than supplanting them. Also, she ensures that Title I funds are not used to provide a service that is required under federal, state or local law. The Title I Director approves all Title I expenditures. In addition, budgets are followed and prepared in accordance with the supplementing rather than supplanting regulation.

GaDOE makes the maintenance of effort calculation based upon information that is in the school district's DE46. This is included on the school district's Title I application.

### **Monitoring**

Title I Budget Manager periodically reviews the detail of Title I expenditures. The review includes proper coding of expenses to ensure they supplement state and local funding rather than replace it. In addition, reviews are conducted to ensure expenses are within the approved non-federal budget. If discrepancies are noted, she is

responsible for follow-up of such. There is no internal audit function at the Board that reviews Title I compliance.

### **Control Environment**

The Board appears to have provided sufficient personnel and have implemented appropriate policies to ensure that the federal program's MOE requirement is met. The Board has adequate and knowledgeable staff to manage this requirement. The Title I Director is responsible for taking appropriate action on known discrepancies.

## **PERIOD OF AVAILABILITY**

Business Plus Accounting Systems is utilized by Richmond County Board of Education. The system allows for different funds and programs to be set up in order to maintain separate accounting for federal grants which simplifies tracking of federal expenditures and recording them in the correct period.

### **Control Activities**

The Business Plus accounting system has edit checks in the system to assure that obligations/expenditures are not charged to an account prior to the award period and after the award period. The Title I Director is responsible for approving any requests for purchase orders and voucher payments. Part of the approval process includes being certain that the obligations/expenditures are within the grant period. The Title I Director approves such with a signature and it is forwarded to the accounts payable department for processing.

### **Information and Communication**

Both the Title I Director and the Budget and Finance Director have a copy of the approved federal grant award and are aware of beginning and ending dates of the grant period. Both have access to the Business Plus accounting system and can view status of grant financial awards at any time. This includes the timing of obligations and expenditures. The system also reflects any unliquidated obligations/encumbrances at any time.

### **Monitoring**

The Board has an internal audit function; however, it does not review any federal programs. A Board meeting is held monthly and the Superintendent, Budget and Finance Director, and the Title I Director attend the meeting. During the meeting, the status of each federal grant is discussed as necessary.

### **Control Environment**

The Board understands and is committed to obligating and expending this major federal program's funds within the grant period approved by the federal agency. Based on a review of the current accounting system, the financial status of the federal program's funds can be attained at any time including the beginning and end of the grant period. Both the Budget and Finance Director and the Title I Director have access to the accounting system at any time and constantly utilize the information to monitor the financial status of the program.

## **PROCUREMENT AND SUSPENSION AND DEBARMENT**

### **Risk Assessment**

The Board follows their procurement policy for all purchases. Although some of Title I funds are used for personnel services, there are some purchases of supplies and expendable equipment. The Title I Director is involved in purchasing for this federal program and coordinates with Erica Hart-Davis, Purchasing Manager, who is in the Central office and oversees procurement activities for the Board as a whole. They are aware of the need (and dangers) that goods and services must be provided by vendors prior to payment. Also, the Board is cognizant that suspension/debarment requirements must be part of the procurement and contract process. There are no sub grantees involved in this federal program.

### **Control Activities**

The Title I Director is aware of all procurement, suspension, and debarment requirements as they relate to the Title I program. She approves all non-personnel expenditures by signing the appropriate PO/requisition. Title I is aware of the requirements of the Richmond County BOE purchasing policy and takes the requirements into account when reviewing expenditures and preparing budgets. The Title I Director is aware of the requirements to check if a vendor that receives \$25,000 or more in Title I monies is suspended or debarred.

### **Information and Communication**

The Title I Director and pertinent Central office staff are well aware of procurement and suspension/debarment requirements applicable to federally funded procurements/contracts. The State's requirements for procurement of goods and services are included in Chapter 34 GA DOE's Financial Management of Governmental Local Units of Administration (LUAS) Manual. Applicable Board staff are aware of the General Service Administration's (GSA) System for Award Management (SAM) website. SAM is the Official U.S. Government system that combined federal procurement systems and the Catalog of federal Domestic Assistance into one system to enable users to search entity records for suspension and debarment activities.

### **Monitoring**

Secretary for the Business Office, Cecilia Perkins, monitors all bids and contracts for Richmond County BOE.

### **Control Environment**

The Board has provided sufficient personnel and have implemented appropriate policies to ensure that the procurement process works according to federal and state requirements. Procedures for complying with suspension/debarment requirements appear to be in place.

## **BUDGETING**

General Fund, Debt Service Funds, Capital Project Funds, and Special Revenue Funds budgets are established and/or changed based upon the legal budgetary level of control (fund level). Increases or

decreases to the budgetary level of control must be approved by the board. Administrative overrides may be approved for object balances not exceeding budget by more than \$25,000. Board approval must be obtained for object totals exceeding \$25,000. Special Revenue budgets are submitted by grant directors/coordinators to the State Department of Education and the local board of education for approval. All federal grants must comply with the expenditure and cross cutting provisions of OMB Circular A87 and A133.

At June 30 of each fiscal year, all encumbrance balances lapse unless approved by the local board of education to be re-appropriated into budget for the succeeding fiscal year.

## CASH AND INVESTMENTS

Deposits and investments shall comply with the requirements of the Official Code of Georgia Annotated (OCGA) Title 45 Chapter 8. Funds on deposit for a period exceeding ten days must be secured by surety bond, guarantee of insurance or collateral equal to not less than 110 percent of the funds being secured. Responsibilities for the receipt of cash must be segregated from the entry of cash transactions into the general ledger. Cash will be received through the Business Office and recorded into the general ledger by staff accountants or the school nutrition bookkeeper. Deposits are to be made timely.

## HUMAN RESOURCES

The setup of pay screens to include the employee screen, pay vector screen, deduction screens for federal and state taxes, fica and medicare taxes, retirement contributions and deductions, and medical contributions for all new employees will be entered by the Human Resources (HR) Payroll Clerk in the Human Resources Department. Additionally, the HR Payroll Clerk will assist in the preparation of teacher contracts, issue annual contract addendums, quotes salaries for all new employees, and makes changes to federal and state withholdings. The Human Resources Department provides a new hire form or a new hire data form with a copy of the teaching certificate to the payroll department for pay verification. Copies of the teaching certificate or personal change form are provided for salary changes occurring for existing employees. Requests made for administrative leave with or without pay must be approved by the Superintendent or Assistant Superintendent.

## PAYROLL PROCEDURES

The Richmond County Board of Education maintains a decentralized process for the input of employee leave time and additional pay. School and department bookkeepers enter timecard information directly into the payroll system using the mask PYTCDTUB. Verification is made by printing a copy of the timecard batch using the mask PYTCDTBP. Payroll is processed either as a monthly batch or a semi-monthly batch. Only employees received Public Employees Retirement qualify for twice a month processing. All other employees are paid only once a month.

Time card entry is made using the following pay codes:

- 101 Sick Leave
- 102 Personal Leave

- 103 Vacation Leave
- 105 Staff Development
- 106 Jury Duty
- 107 Military Leave
- 108 Professional Leave
- 109 Administrative Leave with Pay
- 201 Additional hours
- 212 Over time hours at time and one-half
- 213 Substitute pay
- 301 Pay Deductions (entered as a negative)

The school principal, department director, grant director or administrator approves the batch and either submits it to the payroll department (principal submissions) for processing or to their QLT leader (department/grant submissions) for approval prior to submission to the payroll department based upon the due dates published under the Accounting Department website.

Payroll clerks within the Accounting Department are responsible for the date entry of deductions and contributions not handled by the HR Payroll Clerk. Changes to deductions and contributions are provided by the Employee Benefit Department. Requests for direct deposits are made on the appropriate form and submitted to the Accounting Department. Payroll clerks review timecard entries made by schools and departments. Employee prelists by location are reconciled to the school/department timecard batch. For schools and departments located outside of the main office building are transported by courier on payday. Payroll bags may be signed for by the school/department administrator or bookkeeper. As needed other individuals may be designated in writing by the school/department administrator. For office located within the main office building, department directors or bookkeepers may pick up paychecks after 9:00 on payday from the Accounting Department secretary. Checks within the Accounting Department are distributed by one of the staff accountants.

## PURCHASING AND DISBURSEMENTS

Purchases are initiated at the school, department, or grantor level via the EasyPurchase online processing system or by requisition submitted to the Purchasing Department. A properly authorized requisition requires the approval by the principal, department administrator, grant or project director, superintendent or quality lead team.

The Travel Expense Reimbursement form must be used by all employees to claim reimbursement for official business-related travel expenses. Pre-approval of all out-of-town travel is required. Itemized receipts must be submitted for all meals, lodging, and transportation.

Payment for the purchase of goods or services and reimbursements of travel and other miscellaneous expenses are made by the Accounting Department upon receipt of the appropriate documentation showing that the goods or services have been delivered, and an invoice has been received. Documents prepared for vendor invoices must be reviewed and authorized by the principal, department administrator, grant or project director, superintendent or quality lead team prior to submission for payment.

Expenditures exceeding budget limitations must be approved for override in accordance with administrative policies.

### Control Environment

The Richmond County Board of Education was established by charter on August 23, 1872. The board of education consists of ten members, one from each of ten districts. The members shall be qualified voters of Richmond County and each shall serve a term of four years. The Mission of the Richmond County School System is to educate students to become lifelong learners and productive citizens.

- Every person has the right to a quality education.
- Education is the shared responsibility of the individual, home, school, and community.
- Every person can learn.

The control environment is the foundation of an internal control structure. The key elements of the internal control environment include:

- Management Philosophy. Management's commitment to meet budget and program performance.
- Organizational Structure. The overall framework for organizing, planning, implementing, and controlling activities to meet district objectives.

Human Resources Policies and Practices. Recruitment, hiring, and retention of competent personnel, adherence to the code of conduct, and providing a vehicle for continuous training and staff development.

- Sensitivity to External Influences. Responsive to reviews by grantor agencies and expectations of the citizens of Richmond County.
- Monitoring Performance. Planning, budgeting, and data collection systems identify and support management goals and objectives.

Monitoring of budget to actual performance and taking appropriate action to correct any problems found.

### Information and Communication

The Richmond County Board of Education utilizes the Integrated Fund Accounting Software distributed by Sunguard Financial Systems to process financial transactions. School Max maintains information on student information and Maximus is utilized to record capital asset information. Communication concerning the school district's processes and procedures may be found in the Teacher Handbook, the Accounting Procedures Manual published by the Georgia Department of Education, the Sunguard user manuals, and the online policies manual of the board of education. Risk Assessment Risk assessment is the process in which the school district identifies any risk that could potentially have a negative impact on the fiscal performance of the Richmond County Board of Education.

Risks that may affect the school district's ability to properly record and report financial transactions include:

- Accounting pronouncements

- Changes in personnel
- Changes in technology information systems
- Lack of appropriate communication The Richmond County Board of Education has assessed the level of risk attributed to fraud, abuse, and mismanagement.

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Schools are notified to expend funds once the GADOE approves the budget. All purchases are verified by the Title I Budget Manager, Title I Program Specialist, before the Title I Director approves the purchase. Purchases must be allowable, reasonable and necessary for accomplishing the objectives of the program and for implementing activities as described in the funding application.

Equipment, materials, and supplies are approved if 1) necessary to operate Title I, Part A programs effectively, 2) existing equipment will not be sufficient and 3) the costs are reasonable and 4) allowable under Title I, Part A regulations 5) acquired/consumed specifically for the purpose of the Title I, Part A. The school and LEA must document the details and location of the equipment and the reason for the purchases.

Travel and conference costs are allowable if specifically related to the Title I, Part A program and are reasonable and necessary.

All materials and all services must be provided or delivered in time to benefit substantially the population being served in the current grant period (30 days of the ending date of the grant and in no case after the ending date).

Reimbursements are not an allowable Title I accounting practice. Therefore, there will be no reimbursements for Title I expenditures. Prior approval must be obtained from the Title I Director before making Title I purchases, contracting services or attending conferences.

Purchases and services are completed using easy Purchase, requisition forms or contracts.

### **easyPurchase**

Schools submits orders in easy purchases for approval.

Title I Budget Manager enters the account number and checks to see if the money is in the budget.

1. The Budget Manager sends it to the Title I Director for review to ensure it's allowable, reasonable, and necessary. The Title I Director distributes the budgets to the Title I Program Specialists to ensure that expenditures are included in the SWP/SIP/TA plan.
2. If the purchase is allowable, reasonable, and necessary, the Title I Director submits it to the Purchasing Department
3. The Purchasing Department approves and releases a P.O. to vendors.
4. The Business Plus system allows the Title I bookkeeper to view all approved orders and payments.
5. Once the school receives their materials, the bookkeeper verifies orders in EasyPurchase.
6. The Accounts payable department handles all payments.

Purchases that are not reasonable, allowable, and necessary or not a part of the needs assessment are rejected with an explanation and technical assistance is given to the school to an adequate purchase.

## **Requisitions**

Requisitions are used for Title I office bills, conference registration and conference hotel payments. Once schools receive approval Schools submit requisition to the Title I Department. Approvals are made through Title I and budget manager.

## **Contracted Services**

Contracts are required for all consultants and purchased services. Agreements are entered between the RCSS and the consultant. Each contract/consultant agreement must be signed by the Title I Director and Area Superintendent. Consultant agreements contain the following:

Additional information for the compensation for consultant work is attached.

Specific duties are specifically spelled out for each contract. The contract includes the number of hours to work, the rate of pay, travel costs, description of workshop, and evaluation of student achievement. The consultant agreement is signed by the Contractor, Principal, Title I Director, and Assistant Superintendent.

The Title I Director provides oversight in ensuring that all contractors' work is complete. Artifacts include agenda sign in sheets, and 'proof of service' form. All documents are kept on file in the Title I office. The Title I Director signs off on all contracts prior to the issuance of payment for services. These contracts must be maintained and kept in the Title I files.

The Title I Director ensures that all contractors' work is complete. Artifacts include 'verification of work', daily sign in sheets, and completion of all workshops are kept on file in the Federal Programs office.

Tutors (working with students)

All schools requesting a tutor must complete the Title I Tutor Packet:

- Title I Tutor Overview
- Title I Tutor Consent form
- TRS Retiree Return to Work Request Form: if Tutor is a TRS retiree
- TRS Maximum Part-time Hours – keeping it at 49% (if not a TRS retiree, hours worked cannot exceed 120 per *calendar month*)
- Title I Payroll Table
- Title I Time Log

All tutors must be approved by the Title I and Human Resource Departments.

Before tutors receive payment, principals must submit the tutoring time logs based on the payroll deadlines from the Payroll Department. Schools using the contract services tutors submit the monthly time sheet to the Director of Title I for review of the practices being performed in accordance with the terms, conditions and specifications of the contract agreement and payment authorization.

Richmond County School System Controller of Financial Services administers the drawdown.

- ☐ All grants are divided by 12 months.
- ☐ Drawdowns are done quarterly.
- ☐ This is an acceptable practice to our financial auditors.

- ☐ Financial services are very careful to drawdown these funds based on actual expenditure needs.
- ☐ The system staff accountant reconciles the bank statements.
- ☐ The director of Financial Services performs periodic review of the general ledger.
- ☐ There is no involved as all draw downs are directly deposited into our bank account.
- ☐ All reporting documentation is kept in Finance Services. It can be reviewed at any time.

### **5.1.1 a The LEA has written allowability procedures that provide detailed processes that will take the LEA through grant development and budget process**

#### **Allowability Procedures:**

The Richmond County School System maintains internal controls to ensure compliance with all federal laws and regulations are followed in the 33 elementary, 10 middle schools, 8 high schools, 5 special schools, one Neglected and Delinquent school, one Neglected and Delinquent program, two non-Title I schools, and 2 Targeted Assisted School. The school district utilizes the Business Plus Accounting System and provides separate accounting for each federal program which allows easy access for the federal directors and Director of Budget and Finance.

#### **Comprehensive Needs Assessment**

School level data is used to identify academic needs. Each school completes an annual Comprehensive Needs Assessment as part of the overall school improvement process. Each federal program shares the responsibility for monitoring and for program evaluation.

The Comprehensive Needs Assessment is the foundation for identifying areas that must be addressed to improve student achievement.

- Student test data are analyzed and disaggregated to determine areas of strengths and weaknesses by subgroup and domain.
- All staff members participate in the annual Comprehensive Needs Assessment and participate in data analysis sessions to gain a better understanding of specific needs of all students, including programmatic and instructional needs.
- Special emphasis is given to ensuring that teachers are equipped with appropriate strategies in addressing instructional needs of all students, including those eligible for special services through special education.
- Needs Assessment data, professional learning plans and lists of instructional materials and resources are reviewed annually by system/school-level administrators to make certain that all expenditures are directly aligned to school improvement and increasing student achievement as outlined in federal program requirements

#### **School Improvement /Schoolwide/Targeted Assistance Plan**

After the assessments are complete, principals, teachers, federal directors and all other required stakeholders in the school and community look at where the district's greatest needs are for the students. Schools along with the district write individual plans to outline how supplemental funds will be used to provide additional academic support to the lowest achieving students. After which the school administrators plan budgets to ensure that all expenditures and instructional strategies are based on scientific rESSArch and are directly related to school improvement.

## **Business Plus System**

All federal program grants are set up in the accounting system (Business Plus) of the district for the grant. All costs charged to federal programs must be allowable in accordance with the Subpart E- Cost Principles. Prior to the purchase of any equipment, supplies, or the expenditure of any funds charged to federal programs: (1) necessary, reasonable and allocable, (2) conform with the federal law and all federal program terms, (3) be consistent with state and local policies, (4) must be consistently treated the same, (5) must be in accordance with General Accounting Procedures (GAAP), (6) adequately documented, (7) not included in the match, and (8) must consider both cost reductions and cash refunds in any applicable credits (as indicated in § 200.406). All program purchases must be clearly aligned to the provision of federal program in question as detailed in the new 2 CFR Part 200.

Program guidelines prohibit the use of federal program funds to: provide incentives to participants, purchase foods (light refreshments for parent and family engagement activities), provide services outside of the scope of the program's intended purpose, or purchase other materials or services that are strictly forbidden by federal or state guidelines.

The Federal Programs Director reviews each federal program expenditure to ensure that all expenditures are necessary, reasonable, and allowable (and have supporting documentation to support such) and then provide approval for those activities as outlined in the federal award program. Moreover, when authorizing expenditures related to conferences or workshops, the Federal Programs Director uses discretion and judgment to ensure conference costs are appropriate, necessary, and managed in a manner that minimizes costs to the federal award.

## **CLIP**

Area Superintendents and the Title I Directors are responsible for overseeing the development of Comprehensive LEA Improvement Plan (CLIP). The CLIP is reviewed and revised annually with input from all stakeholders, including those at the school and district level, with additional input from parent and community members in a minimum of two meetings held between the months of May-July of each school year. Central office personnel receive the invitation through email. Minutes and sign in sheets are maintained for documentation of the meeting. The CLIP, data from the previous year's test scores, and the implementation plans are reviewed and revised as necessary. The CLIP and implementation plan changes are documented through the consolidated application.

## **School Improvement**

School Improvement grant amounts are sent to the LEA after the State Board of Education approves Title I, Part A, 1003(a) School Improvement Grants. These grants provide financial resources to Local Educational Agencies (LEA) on behalf of the Title I schools identified as Focus, or Priority schools. There are also financial resources provided to Opportunity-identified schools. These grant awards support each school's improvement plan and the implementation of actions required by the Every Student Succeed Act of 2015 (ESSA). This funding is different from the general Title I funds. These 1003(a) funds are for the specific purpose of supporting improved student achievement in the targeted areas and subgroups related to the Priority or Focus school designation. Schools are notified in writing of the budget amount. The school will be given a date on which a completed budget should be submitted to the Director of Title I. Schools will be provided guidance through the allocation process through meetings, phone calls, and emails. Once the school submits the budget, it is reviewed for allowable expenditures by the Title I Director and Title I team. Upon necessary revisions being made at the school level, the budget is entered into

the Consolidated Application. The school may not purchase items until they have been notified that the budget has been approved. Once approval of the budget has been made at the state level, the school is notified to begin making purchases. All expenditures are signed and approved by the school principal and the Title I Director.

### **Title I, Part A**

Tentative Title I, Part A grant amounts from GaDOE are released in June during the Federal Programs Conference. Title I, Part A funds are used to supplement funds in schools in Richmond County. The district uses the information provided by the GaDOE to determine reservations of funds: Parent and family engagement, neglected and delinquent, private school allocations, per pupil amounts, equitable services, homeless students, and Extended Learning Programs. Schools are notified by letter, given the appropriate budget form and due date to return budgets.

The Title I budget manager must provide copies of documents to the Senior Accountant and coordinate with to set up the budget in the accounting system (Business Plus) of the district for the grant.

### **Parent and family engagement**

A minimum of one percent of the entire Title I allocation is set aside for Parent and Family Engagement and distributed to schools.

### **Private Schools**

The Richmond County School System currently has one Private School that has chosen to participate in the Title I Part A program. The private school worksheet is completed and attached to the Consolidated Application to ensure that all reservations related to parent and family engagement, instructional lead teachers, professional learning, and paraprofessionals have been reserved.

### **Homeless Children and Youth**

The district receives the competitive McKinney-Vento Grant. The district used the funds provided by the McKinney-Vento Grant to hire a Homeless Coordinator to help the Homeless Liaison. The Title I Director and the Homeless Coordinator work together to determine how funds will be allocated. The Homeless Coordinator consults and trains school personnel including: counselors, Parent Coordinators, as well as clerks, teachers, principals, and bus drivers to identify children in homeless situations. A home survey is also used to identify homeless students. The Title I Director is consulted if a student is found to need transportation to a school of origin and arrangements through the transportation department are made. Needs assessments are conducted by the school counselors when a child is identified as homeless. The Homeless Coordinator is contacted and she will provide the needed supplies. The Homeless Grant also provides tutoring services for identified homeless students who are failing a core academic subject that is equal to the amount of the McKinney-Vento Homeless Assistance Grant provide the needed supplies. The Homeless Grant also provides tutoring services for identified homeless students who are failing a core academic subject that is equal to the amount of the McKinney-Vento Homeless Assistance Grant.

### **Neglected and Delinquent Children**

The reservation amount for neglected and delinquent children is provided by GaDOE in the Title I, Part A allocation letter. Currently, there is one residential school and one program for neglected children. The Annual Survey of Local Institutions for Neglected and Delinquent Children is completed each year and is based on the number of children residing at the home for 30 consecutive days with at least one day being in October.

### **School rank order procedures:**

Once Part A amounts are received by the district and set-asides are calculated, per pupil amounts are allocated to schools in rank order of poverty based on the number of children from low-income families who reside in eligible attendance areas (children eligible for free/reduced price meals by direct certification). Low-income is determined by the number of free or reduced lunches at a school using the previous year's October FTE count. Higher poverty ranking schools receive more than the school ranked below them. 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.

The Healthy, Hunger-Free Kids Act of 2010 (Act) includes the National School Lunch Program, a Universal Meal Program, and the Community Eligibility Provision. The Community Eligibility Provision (CEP) uses only direct certification data, such as data from the Supplemental Nutrition Assistance Program (SNAP) or Temporary Assistance for Needy Families (TANF) program to determine the federal cash reimbursement provided by USDA and not annual household applications that are generally used to determine eligibility for free or reduced meals (FRM). Richmond County is a CEP district.

1. The Food Service Department provides a list, by school, of the number of students who are direct certified (DCs) students through SNAP (Supplemental Nutrition Assistance Program) or TANF (Temporary Assistance for Needy Families), Extended Eligible (students "attached" to DCs), Homeless, Runaways, Migrant, Foster Children, and/or others approved by local officials. This information is entered into the Food Service Forum "District CEP Participation by Site". Also, the Food Service Director signs off on the FTE October report verifying the number of Pre-K students at each elementary school who are DC for Free and Reduced Lunch.
2. This number is entered into the Eligible Attendance Area Worksheet in the column "Economically disadvantaged students identified by data for school lunch program minus Pre-K"
3. This number is multiplied by the 1.6 multiplier to give the percentage of DC students by school.
4. Each school is then rank ordered from highest to lowest percentage.

**Budgeting and approval process:**

1. Award letters with allocated dollar amount for budgeting. Program Specialist work with the school's leadership team and area superintendent to develop the school level budgets.
2. Budget and justifications of allocations are sent to the Title I Program Specialist and Title I Director
  - a. All allocated items must be a part of the SWP/SIP/TAP plan.
  - b. Items must be justified by the needs assessment. Items must have direct link to the academic achievement of students.
  - c. Funds requested must be only for those items that are allowable, reasonable and necessary for accomplishing the objectives of the program and for implementing activities as described in the funding application.
    - i. Reasonable costs are defined as those costs that are consistent with prudent business practice and comparable to current market value.
    - ii. Necessary costs are those costs that are essential to accomplish the objectives of the grant project.
    - iii. All items requested must be allowable expenditures under the authorizing program statutes, regulations, and rules allowable under Title I, Part A statute.
    - iv. All materials and all services must be provided or delivered in time to benefit substantially the population being served in the current grant period (30 days of the

- ending date of the grant and in no case after the ending date).
- v. Equipment is allowable if 1) necessary to operate Title I, Part A programs effectively, 2) existing equipment will not be sufficient and 3) the costs are reasonable. The LEA must document the details and location of the equipment and the reason for the purchases.
  - vi. Travel and conference costs are allowable if specifically related to the Title I, Part A program and not to general needs of the district or campus and are reasonable and necessary.
  - vii. Supplies and educational materials are allowable if reasonable and acquired/consumed specifically for the purpose of the Title I, Part A program. The district must document the details and location of the supplies and the reason for the purchases
- d. Budgets found to have items that are not reasonable, allowable, necessary or not a part of the needs assessment are rejected with an explanation and technical assistance is given to correct the budget.
3. Approved budgets entered into the GaDOE Consolidated Application (electronic grant application process) by the Title I Budget Manager.
  4. 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).
  5. After the budget is approved by GaDOE, schools are notified to start spending. All expenditures are reviewed by the budget manger and program specialists. They are each signed off on by the Title I Director.

### **Rezoned Procedures:**

1. Determine new schools or schools that are being redistricted/ rezoned.
2. Request the names of the students being moved from one school to another in this rezoning/redistricting process in order to obtain a count. This information may be obtained from Principal or Infinite Campus.
3. The budget manager pulls the Free and Reduced (F&R) information from GaDOE website. (The previous year 1st October Free and Reduced Lunch Count and the previous year's 1st October FTE. The FTE count is for enrollment. The Free and Reduced Lunch Count is used for determining the number of free and reduced meals.)
4. Request the free and reduced information for students affected by moving to a different school due to a new school opening or redistricting/ rezoning. This information is obtained from the School Nutrition Department.
5. Create a table to show the schools receiving and losing students and the number free and reduced lunch students.

Moving From	# Students	#FR	Receiving school

6. The Worksheet for Eligible Attendance for the Consolidated Application is completed on the moved students.

### **Amendments**

Some federal budget amendments do not require GaDOE approval and some do. The type of grant as well as the amount being amended will determine whether or not the amendment must have GaDOE approval or not.

Schools requiring a budget amendment will submit the changes to the director for approval and the budget manager will enter the changes in the GaDOE consolidated application for approval before submitting the revised budget to the finance department.

#### Instances always requiring GaDOE Amendment Approval

- Any change in personnel allotments or to add an object code not in the original approved budget.
- The addition of a classification of an amount to a line item not previously budgeted.
- An increase or decrease in the budgeted capital outlays as long as a new item is being added.
- Increase or decrease to the amount budgeted in any class/object code on the Program Budget Summary based on the guidelines of each GaDOE grant.

Grant Managers are allowed to transfer monies within the grant. The appropriate budget transfer process for each grant is determined by the guidelines of each grant.

#### **Carryover procedures:**

Budget sheets are monitored monthly 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.

1. The Title I Director and Budget Manager track the spending of each school through budget spreadsheets.
2. At the end of the school year, carryover information is updated and reviewed. Part A, School Improvement, parent and family engagement, Extended Learning Programs (ELP), and professional development for Priority schools is taken into consideration.
3. Schools are allowed to reallocate funds three times during the year, January, March and May. Funds are redistributed based on GaDOE criteria as listed in the Title I, Part A Handbook.
4. 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 and give each school an opportunity to spend the funds. Either way, schools must submit a written description of the expenditure requests. Set asides are recalculated for private school per pupil amounts. Equitable services are also recalculated depending on an allocation of funds for district level activities.

### **5.1.1 g The LEA has a written method for conducting technical evaluations of proposals and selecting recipients for procurement.**

Procurement of materials, equipment, supplies and services is an essential. The RCSS has Established Procurement Manual which shall be in accordance with all applicable laws and consistent with State and Local policies. To ensure the legal and efficient spending of federal and local funds, open and competitive purchasing, impartiality in making awards and the establishment of high ethical standards for all business transactions, the Board of Education requires a process that meets these goals.

Contracted services funded with federal funds must have a contracted services agreement signed by the Federal Programs Director who assures the contract is an allowable and reasonable expenditure compliant with program guidelines. Administrators entering into a contract to use federal funding must assure all purchasing procedures and internal controls are followed in assigning contracted expenditures to the federal program involved.

SAMS Procure, Suspension, and Debarment Certificates will be issued for all contracts of goods and services totaling \$25,000 or more. Vendors will be searched on the SAMS website prior to making a purchase to check for debarment. Vendors must also have a W-9 form and vendor information form on file to be a vendor.

If a vendor is new to the district, they must complete a new vendor information form which is sent to the purchasing department for approval.

Payment of contracted services fees are paid through the following processes:

- Title I Department is notified when an activity is complete by invoice, time sheet, or time logs and agendas. Required documentation is turned in to the Title I Department (Agendas and Sign-in sheets).
- Title I Secretary completes a check request to pay the contractor after work is complete and documentation is turned in.
- Title I Secretary assigns the appropriate account number to the check request based on the type of contract.
- The check request is turned in to the finance department for payment once approved by the Title I Director.
- Finance reviews the form to ensure that all required information is included.
- A copy of each check is attached to the purchase order package that includes the invoice and all other related information and is filed in the Finance Department.

#### **Contract Oversight**

The RCSS policy DJED is used to ensure that all federal programs have contract oversight and avoid conflict of interest.

All approved contractors complete a W-9 and Consultant Agreement.

#### **Conflict of Interest**

Federal programs follow the RCSS Policies FGC and BH to ensure all federal programs avoid conflict of interest.

“No member of the Board of Education shall participate in the action of the Board in awarding a contract in which he is interested personally, or as a member of a firm or majority stockholder or officer of a corporation.”

**Gifts and Bequests**

All federal departments will comply with Board of Education policy DFK. Any gift or donation greater than \$25 will be reported by the receiving Director or Principal. A log of any gift or donation exceeding \$25 will be maintained in the Finance office.

**Records Retention**

The director is responsible for the maintenance and security of all federal records and follows the *Educational Records Retention*.

## **RCSS Policy DJED**

### **BIDS AND QUOTATIONS**

In the conduct of its business the board shall from time to time authorize the advertisement of bids on goods and services to be purchased by the Board. In so doing, the Board reserves the right to reject any or all bids and to accept that bid which appears to be in the best interest of the Richmond County Board of Education, provided appropriate statutes are followed.

Based on Current Practice.

### **ATHLETIC EQUIPMENT**

Rescinded so regular procurement procedures would apply.

Adopted February 14, 1974      Revised August 10, 2000

### **MISCELLANEOUS SCHOOL AND DEPARTMENT BIDS**

Bids shall be taken on purchases exceeding \$7,500 in accordance with appropriate legal standards, although the board may set conditions for items less than \$7,500. Schools must follow the procurement manual on purchases between \$501 and \$3,000. Departments must follow the procurement manual on purchases between \$501 and \$7,500.

#### **Bid Openings**

The superintendent of schools or his designee shall be allowed to open and read vend bids in excess of \$7,500 in public at the board office on dates prior to any regular or special board meetings long as all affected bidders and vendors are notified of the time and place of the bid opening and at least one board member (or more if desired by the board), as from time to time approved and allowed by said board of education is invited to said bid opening, but no board member is required to be present. If this alternative bid procedure is used, the bids so opened shall be computed and presented to the board of education at its next regular or special or next practical called board meeting and at such meeting the contract shall be awarded to the lowest responsible bidder meeting specifications, or all bids shall be rejected and re-bid.

Adopted April 17, 1980

Revised July, 1990

Amended by law, Senate Bill 819, 1992

Amended by law House Bill Effective April 19, 2000

**5.1.1 hThe LEA has a written travel policy that addresses expenses for transportation, lodging, subsistence, and related items incurred by employees who are in travel status on official business of the non-federal entity**

The Richmond County School System has established travel procedures. District employees may be reimbursed for various allowable grant expenditures such as mileage and travel expenses if they are necessary and reasonable for the grant activities.

### **Local Travel**

Local travel costs are allowable if specifically related to the Title I, Part A program and are reasonable and necessary. Employees must use their own vehicle and reimbursement is given at \$.535. The Travel Expense Reimbursement form must be used by all employees to claim reimbursement for official travel expenses.

### **Out of Town**

All out of town travel require approval using the Richmond County School System Travel Reimbursement Form. The form must be approved by the Title I Director, Area superintendent, Assistant Superintendent, and Superintendent of Schools.

The Title I Director must ensure all travel requests are financially reasonable, necessary to operate Title I, Part A programs effectively, located in the SWP/SIP/TA. The Director and school must be able to answer the following questions:

1. How is this workshop addressed in your Title I Schoolwide Plan and your School Improvement Plan?
2. How will this workshop affect student achievement?
3. How will the information received at the workshop be redelivered to other faculty? When will it be redelivered?
4. How will you use the information received during this calendar school year?
5. Is this workshop necessary?
6. Is the cost reasonable?
7. Is this workshop offered in Georgia?

### **Meals**

RCSS uses the per diem allowance method to cover meal cost. It does not require employees to provide meal receipts. Under IRS guidelines paying a per diem amount is allowable under what is called an "accountable plan" as long as the per diem amounts do not exceed the amounts provided for by the U.S. General Services Administration (GSA) and if expenses are timely turned in for reimbursement and timely paid. Most of the employees travel to Atlanta, GA, Jekyll Island/Brunswick, GA or Savannah, GA. The proposed rates below are the approved amounts for those areas by the GSA. From time to time a board member or board employee may travel to a destinations such as in California, Washington D.C. or N.Y. City with higher allowances and are granted permission to pay the per diem amounts for the higher cost areas based on a case by case basis. The Board of Trustees approved the following amounts for meals. They were approved as per diem amounts. Therefore, receipts for meals are no longer required.

The effective date is January 21, 2015.

### **Approved Rates**

Breakfast

\$ 9.00

Lunch

\$ 13.00

Dinner

\$ 29.00

Total

\$ 51.00

Individuals must support a car request form to utilize board cars. If a car is available and the individual does not use it the rate is \$.17 a mile. If a car is not available then the individual/group receives \$.535 a mile.

### **Lodging**

Lodging expenses may be reimbursed. After approval, a blue requisition is submitted for hotel costs and registration fees. Employees are required to attach a hotel receipt to their pre-approval form upon returning. **When registering for lodging the employee should claim exemption from the local hotel sales tax.** The appropriate form is available from the Central Office in paper form. Failure to submit the form at registration will result in the employee having to pay the hotel tax since it is **not** reimbursable.

Upon returning from a trip individuals/groups have three weeks turn in all necessary receipts and request for any reimbursements for any cost incurred by the employees. If an employee does not return the completed reimbursement document within the three week time limit, the Title I office will follow up with each individual to support them in returning all signed documents.

## **Section 5.2: Supplement Not Supplant and Internal Controls**

### **The procedures for ensuring that federal funds are supplementing and not supplanting non-federal sources used for the education of participating children.**

Federal funded expenditures are supplemental to schools' budgets. Title I paid personnel are in addition to the number required to meet maximum class size as determined by GADOE. Federal funds are only used to supplement and, to the extent practical, increase the level of funds that would, in the absence of federal funds, be made available from non-federal sources for the education of students participating in federal programs. Title I funds are not used to take the place (supplant) of local, state, or other federal funding.

Information and discussions regarding supplement vs. supplant are given to schools. All Title I principals are made aware of the supplement not supplant issue during the training that takes place during the summer, before school starts and is posted online for reference. The Title I Director and Program Specialists review budget requests to ensure that supplanting is not taking place. The programs/activities provide supplemental services to programs that are required by federal, state, and local law. Federal funds do not support programs that were paid with state or local funds unless there has been evidence of precipitous decline.

Federal Programs use the follow questions to ensure that programs are supplementing, not supplanting:

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

All expenditures must be necessary, reasonable, and allowable.

The Title I Department monitors expenditures to prevent supplanting.

Class size reduction worksheets are used to prevent supplanting state and local funds.

5.2.2 F The LEA has developed a methodology that equitably distributes state and local funds and resources to each of its schools.

5.2.2 h. Targeted Assistance Programs

1. Expenditures are only used for identified students in a targeted assistance school
2. Expenditures meet traditional 3-prong test (TA Programs ONLY)
  - a. What would have happened in the absence of federal funds?
  - b. Did the school provide the program with Title I funds in prior years?
  - c. Is the district providing the program for non-Title I children with other funds?

Currently Richmond County has two targeted assistance schools, AR Johnson and Terrell Academy (Private School). In the absence of federal funds, the targeted assistance schools would not have the adequate resources or tools to ensure that each identified student receives adequate instructional resources. The amount of Title I funds allocated to each participating public school attendance area is determined mainly on the basis of the total number of low-income students - both public and private - residing in each area. Expenditures for private school students in each area generally are determined based on the proportion of students from low-income families residing in that area who attend private school. The Title I Budget Manager and the Title I Director utilizes the LEA Worksheet to determine the amount of Title I funds for Equitable Services.

**Targeted Assistance Program:** A targeted assistance program provides supplemental services to identified children who are low-achieving or at risk of low- achievement.

**Prerequisite for Eligibility:** Title I, Part A, provides formula grants to school districts, which then allocate most of these funds to individual Title I, Part A schools based on their number of low-income poor children. The eligible population for Title I, Part A includes: (1) children not older than 21 who are entitled to free public education through grade 12, and (2) children who are not yet at the appropriate grade level for free public education.

**Eligibility:** The school selects “eligible children” from this larger pool of students by identifying those who are “failing, or most at risk of failing, to meet the state’s challenging student academic achievement standards. The school makes the determination based on multiple, educational related, objective criteria established by the district and supplemented by the school. Selection is based entirely on low-achievement, not low income.

**Program Focus:** Supplemental assistance in Reading, Language Arts, and Mathematics

1. Supplemental services to identified children
2. Based on comprehensive needs assessment (School Improvement Plan)
3. RESSArch based practices
4. School and community engagement

**Program Plan:** The targeted assistance model must reflect on the needs of the identified students. The plan design must be based on the comprehensive needs assessment, identified from the School Improvement Plan. The targeted assistance program does not require a written plan, as does the schoolwide model. The program model must be based on the evidence of the eight components of targeted assistance program.

**Responsibilities:** The Title I, Part A Administrator and the Title I, Part A teacher/s who are paid with Title I, Part A funds are responsible for making sure regulations are met.

**Service Delivery Model:** Supplemental assistance to core instruction for identified students:

- a. In-class supplemental model (push-in)
- b. Pull-out class model
- c. Before school
- d. After school
- e. Saturday school
- f. Extended school year
- g. Summer school

**Five Step Process: Implementation of Targeted Assistance Model:**

1. Conduct annual needs assessment-analyze data
2. Clarify the vision of reform-review School Improvement Plan
3. Determine eligibility-rank order list
4. Determine and implement supplemental services for identified students
5. Evaluate program

**5.3.h Record of inventory purchased with federal funds that contains the required elements specified in 2 CFR Part 200 (Uniform Grant Guidance).**

**1. 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**

**2 Copy of LEA Equipment Disposition Policy.**

**Disposition of Equipment (EDGAR 80.32)**

Equipment may be disposed of with no obligation to the federal government, if ALL of the following criteria are met:

- (1) Equipment is no longer needed in the current program.
- (2) Equipment is not needed in other programs currently or previously funded by a federal agency.
- (3) Equipment item has a current per-unit fair market value of less than \$5,000.

If the LEA disposes of equipment with a fair market value of less than \$5,000, the proceeds must be used to support the program for which the equipment was purchased. The LEA must submit an equipment disposition summary to the State for review.

If the equipment's fair market value is more than \$5,000, the LEA must submit a cover letter with supporting documentation as per the forms provided for review and submission to the IDEA Budget Manager. Once approval is provided, the LEA may proceed with the disposition process. If items are to be sold after approval of the disposition, the proceeds must be used to support the program for which the equipment was purchased. Documentation of such sale and use for the program must be maintained.

If authorized or required to sell property, proper sales procedures must be established to ensure the highest possible return.

### **5.3 j. Written plan detailing when after-the-fact periodic certifications will be conducted.**

**Periodic Certification:** Federal law requires all employees, including teachers, paraprofessionals and other staff, who are paid with federal funds to document the time and effort spent within the program. Fully-funded federal personnel must submit an assurance (Periodic Certification Form) semi-annually to document 100% of their duties and responsibilities were spent on federal program (Title I Part A) related activities. Principals and other supervisors are provided hard copies of the periodic certification forms which lists Title I paid employees and their roles. The date range of employment within that semi-annual period is documented at the top of each form as it pertains to their start and end date as a Title I paid employee (ex. Academic Support Specialist: July 30, 2015-December 18, 2015). Signed forms, along with copies of daily schedules and professional certifications for each Title I paid employee, are submitted to the Title I Program Specialist and filled in the Title I Department.

Monthly periodic certifications are also distributed to principals for: teachers receiving stipends for professional learning and teaching in extended learning programs, bus drivers used for Extended Learning Programs, tutors, and substitutes used during professional learning. Principals are provided hard copies of periodic certification forms with the lists of personnel paid with Title I funds that month. The first and last dates of that month are documented at the top of each form. The activity they performed and the date it was completed should be listed in the column next to their names (ex. Substitute for A. Brown 3/24/16- Professional Learning on iReady ). Signed forms are also submitted to the Title I Program Specialist to file.

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

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

**Title I Paid Employees Schedules:** All full time Title I paid employees are required to submit a daily schedule of all Title I duties and responsibilities with their signed periodic certifications.

### **5.3.3 n Written procedures and written or digital evidence of LEA verification for suspension and debarment.**

Richmond County utilizes the SAM website located at SAM.gov to verify the suspension and debarment of companies.

The following statement is located on the RCSS website and on all bids for contracts:

2. Debarment, Suspension, and Other Responsibility Matters As required by Executive Order 12549, Debarment and Suspension, and implemented at 34 CFR Part 85, for prospective participants in primary covered transactions, as defined at 34 CFR Part 85, Sections 85.105 and 85.110—Certifications Regarding Lobbying; Debarment, Suspension and Other Responsibility Matters; and Drug-Free Workplace Requirements

A. The applicant certifies that it and its principals: (a) Are not presently debarred, suspended, proposed for debarment, declared ineligible, or voluntarily excluded from covered transactions by any Federal department or agency; (b) Have not within a three-year period preceding this application been convicted of or had a civil judgment rendered against them for commission of fraud or a criminal offense in connection with obtaining, attempting to obtain, or performing a public (Federal, State, or local) transaction or contract under a public transaction; violation of Federal or State antitrust statutes or commission of embezzlement, theft, forgery, bribery, falsification or destruction of records, making false statements, or receiving stolen property. (c) Are not presently indicted for or otherwise criminally or civilly charged by a Government entity (Federal, State, or local) with commission of any offenses enumerated in paragraph (1)(b) of this certification; and B. Where the applicant is unable to certify to any of the statement in this certification, he or she shall attach an explanation to this application.

## **Written cash management procedures**

### **Richmond County Schools Cash Management Procedures**

Decisions are made in accordance with the federal cash management guidelines as well as the specific regulations denoted in 29 CRF.20, 21, and 22.

The majority of the money received by the school district is handled via Electronic Funds Transfers and Automated Clearing House payments.

Cash and checks received by the district are deposited on the day of receipt.

Funds for state and federal grants must be requested based upon actual expenditures. For federal grants that operate on a reimbursement basis, requests for funds are made based upon the actual payment of cash transactions and are drawn monthly after approval of the grant is received. For other draws, the requests are made so that the funds received will be disbursed within three business days.

Tax collections are deposited by the Tax Commissioner's office once a week using a cash vault with SunTrust and Wells Fargo.

Vendor payments are primarily processed weekly, although, some travel checks and discounts payments may be processed more frequently.

Payments for construction projects are processed monthly once the management company, Hanscomb GMK, has reviewed the invoices. The school district awards its banking business on the basis of a request for proposal. To obtain the best arrangement for the school district as a whole, each bank is requested to bid on all bank accounts and school bank accounts collectively and individually. The current banking arrangement has no associated fees. Interest is earned on 100% of the bank balance without consideration of a 10% holdback for transactions in process. The most recent bank bid was effective beginning July 1, 2013 for 5 year extension clause.

Bank cash is reviewed daily via an online Treasury Manager. An analysis of bank costs offset by interest earnings is performed monthly. This assists us in determining the most appropriate vehicle for investment. Monies received for sales tax collections are handled on a 5 year bid proposal. Presently a tri-party agreement through the Bank of New York determines the investment of sales tax proceeds. Funds to pay construction bills are drawn on an as needed basis, usually monthly. Proceeds remaining from prior sales tax collections are invested either in the Georgia Fund 1 or Suntrust Bank.

## **Draw Downs**

Policy/procedures that indicate how sub recipient requests are evaluated before funds are released for reimbursement.

## **Rank Ordering and Allocation Procedures**

The Title I Director and the Title I Budget Manager determine eligibility each year. The following information is used to calculate the poverty percentages for each school: the October FTE counts and Directed Certified Report data from the Temporary Assistance for Needy Families program (“TANF”) and the Supplemental Nutrition Assistance Program (“SNAP”), which is validated by the Director of School Nutrition.

From the October FTE and the number of direct certified students, all school attendance areas (the geographic area from which a public school draws its children) are ranked according to their percent of poverty. Section 104(a) of the Healthy, Hunger-Free Kids Act of 2010 (“Act”) amended section 11(a)(1) of the Richard B. Russell National School Lunch Act provides an alternative that eliminates the need for household applications for free and reduced-price meals in high poverty LEA’s and schools. This alternative, which is now part of the NSLP, is referred to as the Community Eligibility Provision (CEP). Richmond County is a CEP district

All schools are ranked in order from highest to lowest percentage poverty. The Richmond County School System serves, in rank order of poverty schools with 75% poverty first to ensure needs are met then continues on with the districtwide ranking.

## **Rank Order: Identifying Eligible Students**

Eligible students receive supplemental assistance to core instruction for identified students that include:

- a. In-class supplemental model (push-in)
- b. Pull-out class model
- c. Before school
- d. After school
- e. Saturday school

## **Targeted Assistance Programs/Private Schools**

Private schools conduct a needs assessment and a targeted assistance plan is developed. Eligibility criteria are used to determine the students who are most in need of services. Students are ranked using a multiple selection criteria. The most at risk students are selected based on the availability of resources. Assessment data is provided by the private school, scores/levels are given ranges and point values are applied to those ranges. Eligible private school children are identified based on the ranking; the highest ranking children are selected for services.

In all schools selected to receive Title I, Part A funds under the Elementary and Secondary Education Act of 2015 (ESSA) Section 1113(c) that are ineligible for a schoolwide program or that choose not to operate a schoolwide program, a local educational agency serving such school may use funds received under this part

only for programs that provide services to eligible children identified as having the greatest need for special assistance. The following are adhered to in the district's targeted assistance program:

- Restrict Title I, Part A resources to help eligible, participating meet the Georgia Standards of Excellence that are expected of all students.
- Ensure that planning for students served under this part is incorporated into existing school planning
- Use effective methods and instructional strategies that are based on scientifically based research that:
  - strengthen the core academic component of the school
- give primary consideration to providing or increasing extended learning time, such as an extended school year, before-and after-school, and summer programs and opportunities
- Eligible children are identified by the school as failing, or most at-risk of failing, to meet the GaDOE's challenging student academic achievement standards on the basis of multiple, educationally related, objective criteria established by the district and supplemented by the school. Selection is based on the scores of more than one test. The program has an academic component. Targeted assistance schools are required to separately identify Title I students. These schools must meet similar requirements of schoolwide programs, such as emphasizing accelerated curricula, scheduling extended learning time, using effective methods and instructional strategies that are scientifically research based, providing adequate professional development, and coordinating the Title I activities with other school reform activities. Students must be ranked using a multiple criteria selection process.

**Description of the Method by Which Children with the Greatest Need are Selected:**

- a. Kindergarten -2nd grade students will be selected through multiple selection criteria. The Targeted Assistant School designee will create a list of students deemed "at risk", based upon their ranking in the following: classroom performance, local universal screenings and teacher recommendation. Note that preschool through second grade students must be chosen solely on the basis of the judgment of the teacher, interviews with parents and other developmentally appropriate measures examined by the teacher.
- 
- b. 3rd-5th grade students will be selected through multiple selection criteria. The Title I teachers will create a list of students deemed "at risk", based upon their ranking in the following: classroom performance, GA Milestones test scores, local universal screenings, and teacher recommendation.
- 
- c. Children, who are economically disadvantaged, children with disabilities, migrant children, homeless children, or limited English proficient children, are eligible for services under this part on the same basis as other children selected to receive services under this part. In general, the following children are eligible for services:
- 
- A child, who at any given time in the two years preceding the year for which the determination is made, received services under Title I, Part C, Education of Migratory Children.
  - • A child in a local institution for neglected or delinquent children and youth or attending a community day program for such children.
  - • A child who is homeless and attending any school served by the local educational agency.

Targeted assistance schools selects "eligible children" from the entire student population by identifying those who are "failing, or most at risk of failing, to meet the state's challenging student academic achievement standards. The school makes the determination based on multiple, educational related, objective criteria established by the school.

1. Supplement services to identified children
2. Support areas identified in the comprehensive needs assessment (School Improvement Plan)

3. Include research based practices
4. Include school and community engagement

### Schoolwide Programs with select group of eligible Title I students

Title I law states that schools operating schoolwide programs are not required to identify students who are eligible to receive. However, Title I law does require that schools specifically address the needs of low-achieving students, and those who are at risk of not meeting state academic standards. When schools target a group, the school must identify eligible students from the regular educational setting to receive additional supplemental services. Students are selected based on a need identified at the schools. Students are ranked using a multiple selection criteria. The most at risk students are selected based on the availability of resources. For example if math is an identified need at the school and the school only has resources to work with a selected group of third graders then the third graders will be ranked based on two criteria: math grade and GMAS score. The weighted criteria will allow the school to identify and instruct the neediest students first.

### ELP

The ELP rank order guidelines are outlined below:

- Each school is required to provide a detailed description of the multiple selection criteria used to determine rank order and services for identified students. The actual documentation of multiple selection criteria and rank order lists must be kept on file for monitoring purposes.
- The selection criteria must be academic based only; IQ assessments are not allowed.
- Schools should be very specific when defining what the selection criterion means for each criterion.
- Schools must develop one list of students for each subject area and grade level if the program occurs during the day. All students are ranked by subject area being served if the schools conduct ELPs outside of school hours. All rank orders are based on a multiple selection criteria with the weights for each criteria and the total number of points that any one student may earn.
- The rank order list should match the list of students served.

Procedures to correctly calculate the amount of funding for Parent and Family Engagement

The LEA utilizes the consolidated application and the guidelines provided by GADOE.

The RCSS calculates 1% set aside for Parent and Family Engagement.

### **Carryover of Funds**

The Every Student Succeeds Act permits school districts to carryover Title I funds not expended within the fiscal year they are awarded to the next fiscal year. The law specifies requirements for the expenditure of carryover funds exceeding the 15 percent carryover limitation. However, the waiver process allows districts to

request waivers from the Georgia Department of Education (GaDOE) **once every three years** when the district fails to expend at least 85 percent of the allocated funds within the fiscal year.

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.

Richmond County School District has the following options when determining how to spend carryover funds.

1. Allocate the funds to schools by increasing the per pupil amount while maintaining rank order, basing that amount on the total number of children from low-income families in each area or school. The school must provide or plan for the use of these funds.
2. Allocate the funds for district level activities - for example, professional development. Districts implementing this option must ensure that private schools have equitable participation, if appropriate.
3. Allocate the funds back to the school that earned the dollars and give that school an opportunity to spend the funds. The district must ask the school for a plan to spend such funds.
4. Allocate the funds back to all the schools on an equal basis and give each school an opportunity to spend the funds. The school must provide a plan for the use of these funds.

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.

Richmond County School District may need to recalculate set-asides for equitable services for private school participants to include an equitable proportion of carryover funds, if private schools have chosen to participate with the system. Using an amended Consolidated Application and budget sheet, amendments are uploaded using the same procedures followed when uploading the original Consolidated Application and budget sheets. When the official carryover amount is received from Grants Accounting, these funds are amended into the Title I, Part A budget. Budget amendments are approved by the Title I Program Specialist prior to funds being spent.

### **Title I Carryover and Amendment Procedures**

1. Determine amounts to go to schools and those for Set Asides.
2. Notify schools of amount allocated to them and provide them with budget planning forms to complete with a deadline.
3. Make amendment and carryover changes to local school original budget spreadsheets.
4. Make amendment and carryover changes to district budget spreadsheet.
5. On the Consolidated Application, complete Set Aside adjustments. Check to be sure it balances with District Carryover Planning Form.
6. Add line items to budget for all district costs and school costs from the amended planning form and spreadsheet.
7. On School Allotments tab, add the amount allotted to each school in the carryover column.
8. Check to see that "total amount to be budgeted" on each tab equal \$0.00.
9. Make copies and place in Budget notebook.
10. Make additional copies and place in Budget file as needed.

### **Budget Approval Process**

- Funding amounts are approved by the GaDOE Board of Education
- Award letters are sent to districts

- Schools are given the allocated dollar amount for budgeting
- The budget is entered into the GaDOE Consolidated Application (electronic grant application process) by the program coordinator
- The budget is approved by the Program Coordinator
- 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 is approved by GaDOE Accounting

### **Parent and Family Engagement**

A minimum of ninety-five percent of one percent of the entire allocation is allocated to Title I schools. Typically, the full one percent is allocated to Title I schools for parent and family engagement. All Title I parents are given the opportunity to review and provide input in the ninety-five percent of the budget worksheets and codes are designed to specify the amount allocated from the set aside. If the required 1% of PI funds are not spent, the amount not spent within the previous grant period will be allocated to the new fiscal year.

### **Calculating Carryover Funds for Parent and Family Engagement and Private Schools**

1. If all funds allocated in the parent and family engagement 1% required set aside are not expended during the current year, the funds must be carried over to the following year.
2. Any funds not expended for Private Schools will be re-allocated the following year according to the GaDOE procedures and guidelines.

### **Private School Allocations including Carryover**

To assure appropriate calculations initial allocation and carryover funds for Private Schools, if a private school chooses to participate, the district will use the private school templates provided by the GADOE.

### **Private Schools**

The Richmond County School System currently has one Private Schools that have chosen to participate in the Title I program. The private school worksheet was completed and attached to the Consolidated Application to ensure that all reservations related to parent and family engagement, professional learning, and paraprofessionals have been reserved. The district used the information provided by the GADOE to determine reservations for parent and family engagement, Private Schools, Indirect Cost, and Neglected and Delinquent.

### **Set Asides/Reservation of Funds**

#### **Required 1% Set Aside for Parent and family engagement**

Principals have the option of expending their 95% portion of the required 1% set aside in Parent and family engagement funds or submitting them back to the system level. Should a principal decide to direct those funds to a district level parent and family engagement activity/project, he/she must sign a District-wide Parent Activity Assurance Form. Title I parents are informed about the 1% set aside during the Fall Annual Meeting and participate in the discussion regarding this requirement each Spring during Title I planning meetings held at each school. If the total 1% is not expended, the difference must be carried over to the following fiscal year.

### **Administrative Set Aside**

The following salaries and benefits are currently funded with 100% Title I funds: Director of Title I, Title I Secretary, and Homeless Liaison. The administrative set aside is used by the Director of Federal Programs to purchase Title I specific supplies and equipment. In addition, the set aside is used for Title I specific professional learning activities (travel, registration, meals, and hotel accommodations).

### **Professional Development:**

Georgia's Flexibility Waiver no longer requires a set aside for professional learning. In order to promote continuous school improvement, the Richmond County School System will continue to pursue professional development to strengthen best practices in all classrooms. Based on the district level needs assessment, the following salary and benefits to support literacy in Title I SW/TA schools is currently funded with 100% Title I funds: Reading and Math Intervention teachers and literacy paraprofessionals.

### **Homeless Children and Youth**

Title I schools are required to set aside funds within their budgets to meet the needs of homeless children and youth. Richmond County School System receives the McKinney Vento competitive Homeless Grant. The system Homeless Liaison provides training information to school counselors, clerks, teachers, principals, bus drivers, as well as central registration staff and central office staff to identify children in homeless situations and what services are available. A home survey is also used to identify homeless students. The Homeless Liaison is consulted if it suspected that a student qualifies for homeless services. For qualifying students, the Homeless Liaison arranges transportation to the school of origin, if needed, through the transportation department and free meals through the nutrition department. Needs assessments are conducted by the school counselors when a child is identified as homeless. The Homeless Liaison is contacted and will provide the needed supplies. The McKinney Vento grant also provides tutoring services for identified homeless students who are struggling academically. Richmond County School System uses Method #1 to determine the set aside funds for the Homeless program. Funding is based upon the number of homeless students, the support services currently being offered in our schools, previous year's expenditures, consultation with the Homeless Liaison, and the needs assessment information collected from schools identifying students.

### **Neglected and Delinquent Children**

The reservation amount provided by GaDOE in the Title I, Part A allocation letter and worksheet is the amount set aside for neglected and delinquent children. Currently, there is no residential facility for neglected children, effective October 2016. The annual Survey of Local Institutions for Neglected and Delinquent Children is completed each year and is based on the number of children residing at the home for 30 consecutive days with at least one day being in October.

### **Foster Care Transportation**

ESSA requires that districts provide Foster Care Students the option of remaining in their school of origin while in foster care if it is in the best interest of the students. Richmond County has established a set aside to assist with transportation/energy cost that may occur to meet this requirement.

## **Private Schools**

The Richmond County School System currently has one Private School that has chosen to participate in the Title I program. The private school worksheet was completed and attached to the Consolidated Application to ensure that all reservations related to parent and family engagement, professional learning, and paraprofessionals have been reserved. The district used the information provided by the GADOE to determine reservations for parent and family engagement, ELP, Private Schools, Indirect Cost, and Neglected and Delinquent.

## **Additional Parent and Family Engagement**

The following salary and benefits is currently funded with 100% Title I funds: Parent and family engagement specialist. The additional parent and family engagement set aside is used by the Parent and family engagement Specialist to purchase parent and family engagement specific supplies and equipment. In addition, the set aside is used for parent and family engagement specialist specific parent engagement activities (travel, registration, meals, and hotel accommodations).

## **Interpreters/Translations**

Efforts are made, to the extent possible, to provide correspondence to parents in other languages through either written support or support through an interpreter. The Title III Director supports these efforts as well as school staff who are fluent in multiple languages. Parent volunteers are also available to translate in some cases. Our PCSD website provides translation of document. Parent communication is written in a format so that the content is easily understandable.

## **Public School Choice Related to Transportation & Supplemental Educational Services**

RCSS offers Public School Choice.

8.4 Evidence that LEA has written procedures to ensure that it has correctly calculated the amount of funds for equitable services to private school participants and their teachers and families, including carry over.

The LEA utilizes the consolidated application

## **Section 8: Parent and Family Engagement**

### **8.2. a. WRITTEN PROCEDURES ON LEA PROVIDED TECHNICAL ASSISTANCE**

**Written procedures on how the LEA provides technical assistance to schools on all Title I Parent and Family Engagement requirements as well as a plan to carry out effective Parent and Family Engagement practices.**

The LEA utilizes Systemic Family Engagement: A Comprehensive Guide to Implementing an Effective Title I Parent and Family Engagement Program to ensure that all parental requirements are met and that parent engagement initiatives are being implemented. The Title I Director and district staff participate in professional learning opportunities during the annual GCEL Conference, Regional PIC Meetings, the Annual Federal Programs Conference, and the GADOE Parent Engagement Conference.

Title I, Part A provides for substantive Parent and Family Engagement at every level of the program, such as in the development and implementation of the State and local plan, and in carrying out the LEA and school improvement provisions. Section 1118 contains the primary Title I, Part A requirements for SEAs, LEAs, and schools related to involving parents in their children's education. Because regular communication is the foundation of effective parent and family engagement, SEAs, LEAs, and schools must provide information to parents of students participating in Title I, Part A programs in an understandable and uniform format, including alternative formats upon request, and, "to the extent practicable," in a language that parents can understand.

The LEA will provide technical assistance through the following provisions:

- Help parents understand topics (build capacity) that will help them become equal partners with educators in improving their children's academic achievement; such things as—
  - The State's academic content standards and State student academic achievement standards;
  - State and local academic assessments, including alternative assessments;
  - The Parent and Family Engagement requirements of section 1118; and
  - How to monitor their child's progress and work with educators to improve the achievement of their child. *[Section 1118(e)(1), ESSA.]*
- Develop a Parent and Family Engagement policy with the participation of parents. This policy becomes a part of the LEA Plan and establishes the LEA's expectations for parent and family engagement. The Parent and Family Engagement policy describes how the LEA will:
  - Involve parents in helping to develop the LEA Plan
  - Involve parents in the process of school review and improvement.
  - Provide schools with the assistance necessary to plan and implement effective Parent and Family Engagement activities that will improve student academic achievement and school performance.

- Build a school's capacity for strong Parent and Family Engagement by:
  - Helping parents understand the state academic content standards and state assessments
  - Providing materials and training to help work with their children to improve their children's academic achievement
  - Involving parents in school activities, especially academically related ones
- Educate teachers and other staff, with the assistance of parents, about:
  - Recognizing the value and usefulness of parents' contributions
  - Reaching out to, communicating with, and working with parents as equal partners
  - Implementing and coordinating parent programs
  - Building ties between parents and the school
- Coordinate the Parent and Family Engagement program with other programs, such as Head Start, Reading First, and public preschools.
- Arrange school meetings at various times or conduct home conferences between teachers of children receiving services under Title I and parents who are unable to attend such conferences at school.
- Adopt and implement model approaches to improve parent and family engagement.
- Develop appropriate roles for community-based organization and businesses in Parent and Family Engagement activities.

The district works to build the schools' and parents' capacity for strong Parent and Family Engagement through sharing of best practices related to family-school engagement (Harvard Family Research Project, PTA resources, Joyce Epstein Research). The LEA also provides a resourceful Title I website, which offers information on Title I, links to quality learning websites and a community resource manual.

The LEA provides each school a timeline that outlines all requirements, as outlined in the Parent and Family Engagement Compliance and Parent Notification Checklist provided by the Georgia Department of Education. The LEA monitors implementation by requiring documentation of all parent engagement initiatives. If necessary, corrective action is prescribed, ensuring full compliance.

The LEA and school-level parent and family engagement plans are developed jointly with parents and meet the requirements of Title I, Part A. The LEA Parent and Family Engagement Plan is developed in support of the LEA's efforts to support student academic excellence. It establishes the district's expectations for quality family-school engagement and guides the strategies and resources that will build school and parent partnerships in the district's Title I schools. This plan describes the districts' commitment to engage families in the education of their children and to strengthen the ability to implement family engagement strategies and activities designed to achieve the district student academic achievement goals. This includes providing parents

with opportunities to provide input on developing LEA and school improvement plans, the parent and family engagement budget, family-school compacts and the CLIP.

To ensure compliance is attained, Title I offers the following guidelines.

- Provide meaningful consultation with school officials and the parents of students served.
- Assist schools to plan, implement programs, activities, procedures,
- Provide reasonable support for Parent and Family Engagement activities under Title I as parents and schools may request.
- Assist in the adoption and implementation of model approaches to improve parent and family engagement ;

Further, to ensure compliance of the preceding provisions, the LEA will maintain technical assistance forms signed by school officials with documentation of school visits and assistance. Completed forms will be submitted bi-monthly to the Title I Director along with local travel documentation.

The LEA also educates school staff members, including teachers, pupil services personnel, principals, and other staff on:

### **Parent and Family Engagement Input**

The LEA educates the staff members in the value and utility of the contributions of parents, and in how to reach out to, communicate with, and work with parents, implement and coordinate parent programs, and build ties between parents and the school. Prior to the hosting of an Annual Title I meeting, parents' input must be documented before the revisions can be properly implemented. Throughout the school year, parents are given the chance to provide input and be involved in the implementation of plans guiding school provisions, through frequent opportunity to provide feedback and make suggestions at the majority of parent and family events taking place in order to evaluate the effectiveness of the implementation of plans at the schools.

### **Annual Title I Meeting**

All Title I schools are required to hold an Annual Title I meeting at the beginning of the school year. Meetings must be publicized in multiple ways (i.e., flyers sent to parents, web sites, newspaper articles, an automated call system, and marquees at each school). Documentation from this meeting must be submitted to the Title I office to include copies of sign in sheets, agendas, and detailed minutes to the Title I Department. The following components are discussed at every title I Annual Meeting:

- Explanation of what a Title I school is
- Explanation of how the school uses Title I funds
- The participation of the school in the Title I Program
- The school's Title I (schoolwide or targeted assistance) requirements
- The school's status, and what it means
- The Schoolwide Program
  - schoolwide goals
  - programs/supports are in place to support students
- Curriculum used in school

- Tests students participate in
  - How the tests measure student progress
  - Proficiency level is my child expectations
- Parent Engagement
  - LEA Parent & Family Engagement Plan
  - School Parent & Family Engagement Plan
  - Family-School Compact
- Parent Right to Know: Teacher/Paraprofessional qualifications
- ESSA Public School Choice (if applicable)
- Parent & Family Engagement budget

### **Notifications**

*Parent Right to Know* letters informs parents of the right to know of the faculty's teaching certification status. Schools receive sample letters according to the school's status from the district Title I office. Upon receipt of the letters, schools personalize them with the school's letterhead and relative data pertinent to information needed to complete the letters. Each *School's Parent Right to Know* letters are posted on the website and can be viewed by the public as one uniform mean of dissemination.

### **Correspondence in Other Languages**

In collaboration with Title III, when parents request correspondence in a language other than English, the school will provide translation to the parent either through an interpreter or in written form. When requested, employees from the ESOL department will provide applicable assistance.

### **School Council**

School councils in many schools, also serve as leaders for the development of Title I program. The school council meetings are open to the public and are announced via invitation, telephone call, e-mail, and/or website. School council members review the annual surveys and help to make decisions about Parent and Family Engagement activities.

### **Parent Capacity**

Information is provided to school personnel and parents on how to build parent capacity through a variety of ways to include: meetings, handouts, student handbooks, newsletters/flyers, GADOE parent engagement meetings, power points, parent responses to surveys. Also, Title I Program Specialists and Parent Facilitators can play vital roles in facilitating parent workshops that foster capacity building.

Parent coordinators are required to consider and plan for capacity by reflecting on the following questions regarding the six types of parent and family engagement:

1. What strategies/materials have been offered to parents on parenting?
2. What tips/advice have been offered to parents about communicating with the school?
3. How have parents been encouraged to volunteer at the school?
4. What information has been distributed to parents about help their children learn at home?
5. How have parents been involved in the decision-making:
  - A. For their child?
  - B. For the school?

6. Describe your school's collaboration with the community as a type of involvement.

Each Parent Facilitator is required to answer the questions, which were compiled and are as follows:

1. What strategies/materials have been offered to parents on parenting?
2. What tips/advice have been offered to parents about communicating with the school?
3. How have parents been encouraged to volunteer at the school?
4. What information has been distributed to parents about helping their children learn at home?
5. How have parents been involved in the decision-making
6. Describe your school's collaboration with the community as a type of involvement.

### **Parent-School Compact**

The Richmond 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. All Title I schools have parent compacts and are required to review and revise the compacts annually. 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 compacts are to be specific in order to meet the needs of the school and the students. The review and revision typically occurs during the annual Title I meeting at which time the required Title I components are discussed. Parent-school compacts include responsibilities for the school, parent, and students. Copies of the signed parent compacts are kept on file at the school and a copy of each signed parent compact is submitted to the Title I Director.

### **Parent Resource Center**

Parents are informed of their school's resource center and where it is located in the school through their handbook, school newsletters, flyers, school website, and signs posted in the school of the operational hours. One percent of Title I funds are set aside for parent and family engagement. Allowable and necessary materials and supplies are purchased for the centers through these funds. Decisions on expenditures purchased with the 1% are made based on the needs of the school and parental input. Additional information regarding the materials and resources available to parents may be provided by GADOE, through Illuminate sessions and webinars. Suggested materials may include computers for parents use, informational academic brochure, self-help books, student study resources, etc. Many purchases are based upon parent requests on the parent and family engagement surveys (i.e., workshops on helping parents with homework, test taking skills, bullying, etc.) Schools are required to notify parents of the availability of the resources in the parent resource center, which is located in a designated area of the school. This typically achieved through a flyer and/or websites, PTA/PTO meetings and includes information on the types of resources available in or through the resource center.

### **District procedures on how parents are able to provide input on the LEA Parent and Family Engagement policy**

Title I, Section 1118 of the Elementary and Secondary Education Act of 2015 (ESSA) requires that each school receiving Title I, Part A funds develop jointly with, agree on with, and distribute to parents of participating children a written Parent and Family Engagement policy. Parent and

family engagement plans and policies are reviewed and revised annually with parents. Plans are reviewed at the Input/Revision District Title I meeting. At the Title I meetings, parents are allowed to have input on revisions of the Parent and Family Engagement Plans and Policies. Plans include the required components of the parent and family engagement checklist. Plans are reviewed by the Title I Director during on-site monitoring. Plans include activities/workshops that have been identified and requested through the previous year's annual parent and family engagement survey. School improvement and parent and family engagement plans are posted on the website, available at the school or hard copies may be sent home upon request. A copy of each school's checklist is placed in the Title I Director's folder by schools.

**Written description of the LEA's process to collect and review the effectiveness of the LEA Parent and Family Engagement plans and practices, including any action the LEA has taken to improve the quality and effectiveness of Parent and Family Engagement policies and practices as a result of that review**

*Actions Taken by LEA to Improve the Quality and Effectiveness of Parent and Family Engagement Policies and Practices*

District Title I Parent Advisors, along with several school level Parent Facilitators, are invited to review the annual spring survey as well as the results from the previous spring surveys. Additions/deletions/revisions are discussed and agreed upon during this meeting. The formatting or revisions are made after the meeting and then sent back to advisors for comment. If no further suggests are made, the surveys are sent to schools to print and send to parents without being embedded in other materials.

Parent and family engagement workshops and activities are planned for the following year utilizing feedback from the annual spring survey results. 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 involvement of parents and to support a partnership among the schools, parents, and the community to improve student academic achievement, through the following activities, at a minimum:

- ☐ Annual meetings
- ☐ Conferences
- ☐ E-mail communications
- ☐ Phone calls
- ☐ Parent workshops and activities
- ☐ Family nights
- ☐ Volunteering
- ☐ Parent advisory meetings
- ☐ Open Houses
- ☐ Annual notification of AYP status
- ☐ Newsletters/flyers/brochures
- ☐ Website information
- ☐ Board of Education meetings

## **School procedures on how parents are able to provide input on the school Parent and Family Engagement policy**

### **School Level Parent and Family Engagement**

#### **Title I**

#### **Section 1118 for ESSA**

Each Title I school will develop a parent and family engagement plan that gives additional attention to the areas indicated below:

1. Develop jointly with, and distribute to, parents of participating children a written policy describing implementation of the requirements in a language that is simple, concise and jargon-free and updated periodically to meet the changing needs of parents and the school, and such policy is made available to the local community.
2. Convene an annual meeting, at a convenient time, to which all parents of participating children shall be invited and encouraged to attend, to inform parents of their school's participation under Title I and to explain Title I, its requirements, and their right to be involved.
3. Offer meetings using a flexible schedule, such as meetings in the morning or evening, and may provide, with funds provided under Title I, transportation, child care, or home visits as such services related to Parent and Family Engagement to eliminate parent and family engagement barriers.
4. Involve parents, in an organized, ongoing, and timely way, in the planning, review, and improvement of programs under Title I, including the school Parent and Family Engagement policy and the joint development of the schoolwide program plan under section 1114(b), except that if a school has in place a process for involving parents in the joint planning and design of its programs, the school may use that process, if such process includes an adequate representation of parents of participating children.
5. Provide parents of participating students' timely information concerning:
  - a. Title I programs in the school.
  - b. Results of the annual school review including school performance profiles.
  - c. Individual student assessment results and interpretation of those results.
  - d. A description and explanation of the school curriculum.
  - e. The assessments used to measure student progress and the proficiency levels the students are expected to meet.
  - f. Opportunities for regular meetings to formulate suggestions, share experiences with other parents and participate as appropriate in decisions relating to the education of their children.
  - g. Provide timely responses to parent suggestions.
  - h. Collect all unsatisfactory parent comments regarding the Schoolwide Plan and attach those comments to the Schoolwide Plan when submitted to the LEA.

6. Provide assistance to participating parents in such areas as understanding the:
  - a. National Education Goals.
  - b. State's content standards and student performance standards.
  - c. Components of a schoolwide program
  - d. Components of a targeted assistance school program if applicable.
  - e. State and local assessments.
  - f. Requirements of Title I, Part A
  - g. Ways parents can monitor their children's progress and work with educators to improve the performance of their children.
  - h. Ways parents can participate in decisions relating to the education of their children.
7. Provide materials and training such as:
  - a. Coordinating necessary literacy training and using technology from other sources to help parents work with their children to improve their children's achievement.
  - b. Training to help parents work with their children to improve their children's achievement.
8. Educate teachers, pupil services personnel, principals and other staff, with the assistance of parents, in the value and utility of contributions of parents, and in how to reach out to, communicate with, and work with parents as equal partners, implement and coordinate parent programs, and build ties between home and school.
9. Coordinate and integrate parent and family engagement programs, activities and strategies with Head Start, Title I-B, Migrant, Homeless, Pre-K Programs, Home Instruction Programs, to the extent feasible and appropriate.
10. Develop appropriate roles for community-based organizations and businesses in parent and family engagement activities, including providing information about opportunities for organizations and businesses to work with parents and schools, and encouraging the formation of partnerships between elementary, middle, and secondary schools and local businesses that include a role for parents.
11. Conduct other activities, as appropriate and feasible, such as parent resource centers and opportunities for parents to learn about child development and child rearing issues beginning at the birth of a child, that are designed to help parents become full partners in the education of their children.
12. Involve parents in an ongoing and end of year assessment to evaluate the effectiveness of the parent and family engagement initiatives as a measure of performance evaluations of the school.
13. To the extent practicable, provide full opportunities for the participation of LEP parents, parents of migratory children, and parents with disabilities including providing school profiles and information related to school and parent programs, meetings, and other activities in a language and format that parents can understand.

14. Provide other reasonable support for Parent and Family Engagement activities as parents may request.
15. Involve parents in the joint development of the school-parent compact that outlines how parents will be responsible for supporting student learning.
16. Describe the school's responsibility to provide high-quality curriculum and instruction in a supportive and effective learning environment that enables the children served under Title I to meet the State's student performance standards.
17. Explain the ways in which each parent will be responsible for supporting their children's learning, such as monitoring attendance, homework completion, and television watching; volunteering in their child's classroom; and participating, as appropriate, in decisions relating to the education of their children and positive use of extracurricular time.
18. Address the importance of communication between teachers and parents on an ongoing basis through, at a minimum –
  - a. parent-teacher conferences in elementary schools, at least annually, during which the compact shall be discussed as the compact relates to the individual child's achievement.
  - b. frequent reports to parents on their children's progress.
  - c. reasonable access to staff, opportunities to volunteer and participate in their child's class, and observation of classroom activities.
19. Distribute a copy of parent-school compact to parent in a language that is understandable.

### **Parent and Family Engagement Surveys**

**Process to Collect:** The annual survey is provided to schools after parent advisors have reviewed and made suggestions for improvement of the survey. Schools typically choose a brightly colored paper on which to print all Title I information, including the survey, which are also posted on the website. Advertisement of the survey and requests for completion occur through the newspaper, website, parent flyers, and radio or TV announcements. The surveys are collected and compiled and the following year's parent and family engagement activities are built from the responses. Parent coordinators are encouraged to use volunteers to help compile survey results.

**Process to Review:** The results of the surveys are shared among several groups of stakeholders, including, but not limited to, parents, school and central office administration, and parent and family engagement coordinators. School councils/Title I advisors and those attending the annual Title I meeting review the results of the surveys while reviewing and revising the schoolwide and parent and family engagement plans and components.

**Written description of the LEA's process to collect and review the effectiveness of the LEA Parent and Family Engagement plans and practices, including any action the LEA has taken to improve the quality and effectiveness of Parent and Family Engagement policies and practices as a result of that review**

School level Parent Coordinators, invite parents to review the annual spring survey as well as the results from the previous spring surveys. Additions/deletions/revisions are discussed and agreed upon during this meeting. The formatting or revisions are made after the meeting and then sent back to advisors for comment. If no further suggests are made, the surveys are sent to schools to print and send to parents without being embedded in other materials.

Parent and family engagement workshops and activities are planned for the following year from the annual spring survey results. Materials are also purchased for parent resource centers from expressed needs. Many opportunities are provided for building strong parent capacity. The purpose is to endure effective involvement of parents and to support a partnership among the schools, parents, and the community to improve student academic achievement, through the following activities, at a minimum:

- ☐ Annual meetings
- ☐ Conferences
- ☐ E-mail communications
- ☐ Phone calls
- ☐ Parent workshops and activities
- ☐ Family nights
- ☐ Volunteering
- ☐ Parent advisory meetings
- ☐ Open Houses
- ☐ Annual notification of AYP status
- ☐ Newsletters/flyers/brochures
- ☐ Website information
- ☐ Board of Education meeting

**Parents Right to Know Teacher Qualifications**

Parents are informed of their rights to know the qualifications of their children's teacher. This information is made available through the newsletter, student handbook, website, and other information sent home with students. If a student has been assigned to or has been taught for four or more consecutive weeks by a teacher of a core academic subject who is not highly qualified, parents are provided a timely notice.

(School Letterhead)

**Documentation and Dissemination  
Of  
School Status  
Parent Notification Letters**

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**School Name**

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**Dissemination Date (s) (month-date-year)**

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**Method of Dissemination** (Annual Title I Meeting, Parent Teacher Conferences, Front Office, Student Handbook, School Newsletter, School Webpage, Classroom Teacher, sent Home by Student, mail, email, etc.)

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**Signature of Principal****Date (month-day-year)**

Georgia School Keys: 1.1 Communications Between School and Parents and Community

***“Learning Today...Leading Tomorrow”***

- ☐ All notices and information required must be in a uniform and understandable format, including alternative formats upon request and, to the extent practicable, in a language that parents understand. Parents may request and receive information regarding:
  - ☐ Whether the teacher has met state qualifications for the grade levels and subject areas in which the teacher teaches.
  - ☐ Whether the teacher is teaching under emergency or other provisional status.
  - ☐ The baccalaureate degree of the teacher and any other graduate certification or degree held by the teacher and the field or discipline of the certification or degree.
  - ☐ Whether the student is provided services by paraprofessionals.

Parent notification is not required for the following:

- ☐ For teachers who do not teach core academic subjects in Title I schoolwide or targeted assistance programs.
- ☐ For paraprofessionals who are not highly qualified.

Principals are required to send a letter to the parents of those students who are taught four or more weeks by a teacher who does not meet HiQ status. (See Appendix G) Additionally, the director suggests this letter for any person who fills a teacher's position for an extended period. This is to support effective parent communication. Retired, highly qualified teachers are most often used to fill long-term substitute situations.

Principals must submit attestations to the Title I Department in order to identify teachers in their school who are not HiQ. A documentation and dissemination form must be submitted to Title I as evidence that the letters were distributed and the date and methods used for dissemination.

Principals must also sign an assurance that their paraprofessionals are working in close proximity to a teacher who is highly qualified.

**School Letterhead**  
**Richmond County School System**  
**Title I Department**  
**Verification of Proper Paraprofessional Assignment**

The following paraprofessional (**Name of Paraprofessional**) has been assigned to work with (**Teacher's Name**) and I verify that this teacher is highly qualified and the paraprofessional will be working in close and frequent proximity of the teacher.

\_\_\_\_\_  
Principal Signature

\_\_\_\_\_  
Title I Director Signature

\_\_\_\_\_  
Date

\_\_\_\_\_  
Date

Letters to Parents

Principals are required to send a letter to the parents of those students who will be taught four or more weeks by a teacher who does not meet HiQ status. Additionally, the Title I director suggests a letter for any person who fills a teacher's position for an extended period. This is to support effective parent communication.

**Documentation and Dissemination  
Of  
Highly Qualified  
Parent Notification Letters**

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**School Name**

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**Dissemination Date (s) (month-date-year)**

---

**Method of Dissemination** (Annual Title I Meeting, Parent Teacher Conferences, Front Office, Student Handbook, School Newsletter, School Webpage, Classroom Teacher, sent Home by Student, mail, email, etc.)

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Signature of Principal

Date (month-day-year)

Georgia School Keys: 1.1 Communications Between School and Parents and Community

***“Learning Today...Leading Tomorrow”***

**Documentation and Dissemination  
Of  
Reward Schools  
Parent Notification Letters**

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**School Name**

---

**Dissemination Date (s) (month-date-year)**

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**Method of Dissemination** (Annual Title I Meeting, Parent Teacher Conferences, Front Office, Student Handbook, School Newsletter, School Webpage, Classroom Teacher, sent Home by Student, mail, email, etc.)

---

Signature of Principal

Date (month-day-year)

Georgia School Keys: 1.1 Communications Between School and Parents and Community

***“Learning Today...Leading Tomorrow***

## **Technical Assistance to Schools on Title I Parent and family engagements**

### **Annual Title I Meeting**

The Title I annual meeting is usually held during the first PTA meetings or in a timely manner. Parent and Family Engagement Portfolio requirements are distributed to the Parent Facilitators at this meeting. (See Appendix E) Schools are required to hold an annual meeting and submit documentation of the required Title I annual meeting, including a copy of the sign in sheet and agenda with minutes. A checklist is provided describing the requirements of Title I and a sample agenda are provided to schools for technical assistance to ensure required components of the school improvement plan, parent and family engagement plan, and compact are reviewed and revised with parents. Many schools hold their Title I meetings in conjunction school

### **School Status Letters and Notifications**

Sample Parent Right to Know and School Status letters are provided to schools. (See Appendix F) The letters describe current status as well as how the status was determined. Principals revise the letters to meet their school's status and other personalization, place them on school letterhead with contact information, and send them home with students at the beginning of school. Letters are distributed to parents and documentation of when and how the letters are sent to parents is required to be sent to the Title I director. Each school's status can be located on the website. Principals may use other means of notifying parents of their school's status.

### **Correspondence in Other Languages**

When parents request correspondence in another language, the school will provide assistance to the parent either in their language or provide and interpreter. The school system has employees that are capable of translating correspondences in other languages.

### **Parent Advisors**

All parents will be notified through announcements on the Website, marquees, the students and in the newspaper. Parent advisors and all parents will be emailed an invitation to attend the meeting. Schools are required to have parent advisors. At the beginning of each year, the parent advisor names, addresses, phone numbers and e-mail addresses are submitted to the Title I Director, who utilizes them as the system's Title I advisors for the purpose of reviewing required components of the Title I program (CLIP), Priority and Focus schools implementation plans, budgets, parent and family engagement ). Invitations to the meetings are via written invitations and e-mails. Schools also use their parent advisors, as well as parents who attend the annual meeting, to review the required components of the schoolwide program. School councils are, in many schools, also serves as parent advisors. The school council meetings are open to the public and are announced via invitation, telephone call, e-mail, and/or website. Parent advisors review the annual surveys and help to make decisions about Parent and Family Engagement activities.

A sign-in sheet, invitation/announcements, agenda, and minutes will be submitted to the Title I Director. Additional information can be received by contacting Angeline Andrews-Milton, Title I Director at 706-826- 1134

**Section 10: School Improvement 1003(a)**

Schools are working to improve performance on the 12 Georgia School –Key Standards. Using a rubric provided by the GADOE District and School Effectiveness Office, performance levels range from “Not Evident”, “Emerging”, “Operational”, and “Exemplary”. According to the MOA that RCSS signed, all schools will be “Operational” by June 2018. “Operational” and “Exemplary” are considered fully implemented to the Georgia Department of Education.

See Attached Rubric

There are usually two to three meetings held in regard to the school improvement plans. This occurs after the initial, beginning of the year Title I meeting, in which all components of the program are discussed. These meetings are held with individual school personnel, Executive Directors, Program Specialist, and the Professional Learning Director to name a few.

The LEA provides Program Specialists to support schools in developing, revising, implementing and coordinating target assistance and school improvement plans as a part of the Leadership Team Meetings at individual schools. In these meetings, the data is analyzed to identify problems and discuss solutions to the identified problems. The Program Specialists and the Parent Facilitators also provide assistance in implementing requirements for parent and family engagement . Professional Learning is a system effort with the support of the Title I Department. Professional Learning is provided for the Parent Facilitators, Instructional Coaches, and the Intervention Specialists to equip them to assist in their schools in Parent and Family Engagement and the development of instructional strategies.

The Program Specialists assist schools in developing their budgets to make sure that the funds are being used to develop instructional strategies, implementing requirements for parent and family engagement , identifying effective professional learning, and analyzing and revising the school’s budget to make sure that the resources are allocated effectively. The budgets are checked and if something on the budget is not allowable or is not aligned to their school improvement plan, it is returned to the school and assistance is offered.

**On going –**

The Federal Programs Director provides technical assistance and meets regularly with principals.

Based on continuous data analysis, principals and leadership teams make changes to the school improvement plans. Feedback on the schoolwide/targeted assistance plans are sent to each principal via the schoolwide checklist.

Corrections to the plans are made as needed by principals and updated copies are sent to the district office

**Schoolwide****Overview**

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 to demonstrate 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 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 rESSArch 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 parent and family engagement.
6. Plans for assisting preschool children in the transition from early childhood programs to local elementary school programs.
7. Measures to include teachers in the decisions regarding the use of 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.

In addition, the school providing a schoolwide program must also evaluate its plan by reviewing, on an ongoing basis, the progress of all children. If necessary, the school must adjust its plan to provide additional assistance such as an extended school year, before and after school programs, summer programs, and training for teachers on how to identify students requiring additional assistance and how to implement student achievement standards in the classroom.

Schoolwide Plans are updated and verified using a checklist at each school's annual leadership meeting after receiving feedback at Annual Title I Parent Meetings. Parents are also invited to a system level Parent Advisory Council meeting. All schools will notify stakeholders in multiple ways, notice of the meeting dates will be placed on each schools marquee, in each school newsletter and on the web site, parents and other stakeholders will be notified by invitation sent from each individual school and all stakeholders will be notified using each school phone messaging system. Parents that cannot attend the meeting will be given the opportunity to obtain a copy from each school and submit input before the final revisions are approved. Revision dates will be clearly marked on each plan. The system Family Engagement Specialist will be responsible for collecting the required information (agenda, meeting notes, and sign in sheets). At these meetings, parents and other stakeholders are given an opportunity to provide input on the Schoolwide Title I Plan, School Improvement Plan, Parent/ Student/Teacher Compacts, Parent and family engagement Plans, Extended Learning Programs, and the Comprehensive LEA Improvement Plan.

#### LEA Guidance

On-site meetings are held with principals to discuss the current status of their plans in regard to checklist components. Missing or items in need of revision are marked on the checklist and then rechecked when the revised plan is submitted. Copies of agendas and sign-in sheets from such meetings will be collected and stored in a Title I notebook as evidence and documentation of meetings. As previously stated, system leaders support schools in developing, revising, implementing and coordinating school improvement and schoolwide plans during regularly scheduled administrative and Instructional Coach 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.

#### Schoolwide Program Plan Development

School Improvement and Schoolwide Plans are updated each spring for the following school year. Each school leadership team conducts a spring meeting at which representatives from each grade level, content area, and department, as well as system and school administration and parents meet to develop a plan. During school leadership meetings, instructional strategies, Parent 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 then present their school plans at the annual system leadership retreat as they work with other schools, system leaders, and parents to develop a system improvement plan. It is through this process that the LEA oversees the development of school improvement plans.

#### Targeted Assistance

Local educational agencies (LEA) serving schools that are either ineligible for a schoolwide program or that choose not to operate a schoolwide program, may use Title I funds only for programs that provide services to eligible children identified as having the greatest need for special assistance.

#### School Improvement Plan

The LEA provides several technical assistance workshops on creating school improvement plans. Schools are tiered based on CCRPI and plans are developed to include specifics on academic achievement, operational effectiveness, and community engagement. Schools that are federally identified are given specific requirements to include in their plans.

Schools who are identified as priority or focus schools have entered an Memorandum of Agreement with the Georgia Department of Education. This MOA outlines the areas that the GADOE will abide by, the school system will abide by, and the schools themselves will abide by.

The LEA provides ongoing training and technical assistance to identified schools. This includes identification and methodology, school key-standards, utilization of Indistar (QCIS), understanding CCRPI, and webinars that focus on monitoring and continued school key-standard work.

The LEA has provide technical assistance and ongoing guidance to help schools develop a combined plan that includes both the schoolwide plan and the school improvement plan.

The Program Specialists assist schools in developing their budgets to make sure that the funds are utilized to develop instructional strategies, implementing requirements for parent and family engagement, identifying effective professional learning, and analyzing and revising school's budget to make sure that the resources are allocated effectively. The budgets are checked and reviewed by the entire Title I Department and if something on the budget is not allowable or is not aligned to their school improvement plan, it is returned to the school and technical assistance is offered. Schools are also given guidance for amendments for any changes that are unforeseen.

#### **Section 11: School Improvement 1003(a) SIG**

The 1003(g) School Improvement Grant (SIG) is a competitive multi-year grant that provides funds to LEAs to improve student achievement in selected Priority schools through the implementation of a whole-school reform model that is in alignment with the US ED SIG Guidance and Assurances. To award funding to LEAs that demonstrate through their grant applications the strongest commitment and capacity to fully implement the identified model of reform.

#### **SIG School (School Improvement Grant SIG 1003(g) Definition**

Only Priority Schools are eligible to compete for the SIG 1003(g) grant. The awarded schools receive SIG funds 1003(g) to implement a school intervention model.

The Georgia Department of Education provides the following:

- SIG 1003(g) funds to awarded SIG Schools
- State professional learning opportunities such as the Instructional Leadership Academy for district and building leaders working in SIG Schools
- Regional professional learning opportunities that may pertain to the concerns of the SIG Schools
- School effectiveness specialists who are available to support the SIG Schools in the implementation of their reform initiatives/school improvement plan, the area(s) of concern highlighted by the school's CCRPI data, and the school's plan to use the Title I funding, if applicable.
- Targeted technical assistance workshops related to the school's designation as a SIG 1003(g) school, and Title I, Part A, School Improvement 1003(a) funding, when applicable.

#### **School Improvement Grant 1003(a) Purpose**

- To provide financial resources to local educational agencies (LEA) on behalf of Title I schools identified as Focus or Priority.

At this time, no priority schools in Richmond County are considered SIG, 1003 (g) School

## **Section 11: Services For Homeless Children and Youth**

The LEA has written procedures for the education of homeless children and youth that identify and remove any barriers.

The written procedures must include:

- a. Identification
- b. School Selection
- c. Enrollment
- d. Transportation
- e. Disputes

This is a federal law that ensures immediate enrollment and educational stability for homeless children and youth. McKinney-Vento provides federal funding to states for the purpose of supporting district programs that serve homeless students. Homeless children are defined as “individuals” who lack a fixed, regular, and adequate nighttime residence. The district must designate a homeless liaison to ensure that homeless students and youth are identified and served. The liaison must provide public notice to homeless families (in the community and at each school) and facilitate access to school services including transportation and free meals. School districts are also required to track their homeless students and report that data annually. “Each State educational agency shall ensure that each child of a homeless individual and each homeless youth have equal access to the same free, appropriate public education, including a public preschool education, as provided to other children and youth.” (Title X, Part C, § 721(1))

The McKinney-Vento program is designed to address the problems that homeless children and youth face in enrolling, attending, and succeeding in school. Homeless children and youth should have access to educational and other services that they need to meet the same State academic achievement standards and State academic assessments to which all students are held. States and LEAs are required to review and undertake steps to revise laws, regulations, practices, or policies that may act as barriers to the enrollment, attendance, or success in school of homeless children and unaccompanied youth. The Homeless Liaison, Director of Title I and additional district level staff if needed review the policies and procedures annually.

### **FILE: JBC(1)**

#### **HOMELESS STUDENTS AND UNACCOMPANIED YOUTH**

In accordance with the McKinney-Vento Homeless Assistance Act, the school system will work with homeless children and unaccompanied youths and their families to provide stability in school attendance and other services. Using the Student Enrollment Questionnaire, special attention will be given to ensuring the enrollment and attendance of homeless children and youths not currently attending school in a manner that will not stigmatize or segregate them on the basis of their status as homeless. Homeless students will be provided comparable system services for which they are eligible, including, but not limited to, Head Start and pre-school programs, Title I, similar state programs, educational programs for students with disabilities or limited English proficiency, vocational and technical education programs, gifted and talented programs and school nutrition programs.

Every child of a homeless individual and unaccompanied youth are entitled to equal access to the same free, appropriate public education and transportation as provided to other students. The system will immediately assign and admit a child who is homeless or is an unaccompanied youth to a system school regardless of residence or whether the homeless child is able to produce records normally required for enrollment.

Explicitly, the School System is committed to meeting the needs of all homeless children and unaccompanied youths who reside inside and outside of Richmond County, but whose school of origin is located within the Richmond County School System. The means of transportation of such youth shall be handled on an individual basis. If the student in transition is living in this system but attending school in another or attending school in this system but living in another, this system will coordinate with the neighboring system to arrange for appropriate transportation.

The Superintendent will review and revise as necessary rules or procedures that may be barriers to enrollment of homeless children and youths. In reviewing and revising such procedures, the Superintendent will consider issues of transportation, immunization, residence, birth certificates, maintenance and transfer of school records and other documentation.

The Superintendent will appoint a liaison for homeless children.

A "homeless child" is defined as provided in the McKinney-Vento Homeless Assistance Act.

Anyone having a concern or complaint regarding placement or education of a homeless child or youth may initiate the resolution process directly at the principal's office of the school in which enrollment is sought or at the system homeless liaison's office, either of which shall carry out the dispute resolution process as expeditiously as possible. If the dispute arises over school selection or enrollment, the child or youth shall be enrolled immediately in the school in which he/she is seeking admission, pending resolution of the dispute. Decisions at the school level may be appealed to the homeless liaison, whose decisions may be appealed to the Superintendent of Schools and then to the Board. If the dispute remains unresolved at the system level, the parent may request a review of the dispute and the Board's decision by the Georgia Department of Education, in accordance with Dispute Resolution Guidelines and Procedures included in the Georgia Department of Education's publication "Implementing Title I in Georgia Schools: A Handbook for Title I Directors", which is available on the Department's web site.

Legal References: **Georgia Code**

O.C.G.A. 20-02-0150

O.C.G.A. 20-02-0293

O.C.G.A. 20-02-0690.1

O.C.G.A. 20-02-0694

Rule 160-5-1-.28

**US Code**

42 USC 11431

**Description**

Eligibility for enrollment

Student attending school in system other than  
system of student's residence

Mandatory education for children between 6 and  
16

Administration/enforcement of attendance reqts.

Student Enrollment and Withdrawal

**Description**

McKinney-Vento Homeless Assistance Act

## Method for Identifying Homeless Students

Richmond County School District's homeless liaison meets with school personnel to discuss the requirements of the McKinney-Vento Homeless Education Act. Among the topics discussed are the transportation requirements for schools of origin and the definition of, and services for, students identified as homeless. The homeless liaison works very closely with the school guidance counselors, social workers, district registration department and transportation department to assure students receive the services they need. She provides posters and assures these are placed where parents, guardians and students can readily see them.

The local liaison serves as one of the primary contacts between homeless families, unaccompanied youth and school staff, district personnel, shelter workers, and other service providers. The liaison coordinates services to ensure that the needs of homeless students and youth are met. Homeless students enroll in school and have every opportunity to succeed academically and in school.

### **McKinney-Vento Homeless Education Monitoring Procedures**

Monitoring of federal programs is conducted to ensure that all children have a fair, equal, and significant opportunity to obtain a high-quality education. Monitoring emphasizes accountability for using federal resources wisely and serves as a vehicle for the Department to help LEAs achieve high quality implementation of educational programs utilizing the LEAs' federal allocations.

### **The Homeless Education Liaison will carry out the requirements of the McKinney-Vento Homeless Assistance Act.**

Included in the liaisons duties are to maintain the following records and information:

- Continuation of professional development by attending monthly district level Title I meetings, Title I Conferences, McKinney-Vento Trainings, District Pre-planning meetings and others to gain knowledge of technical assistance and compliance issues and up-dates or changes to the homeless education program. The liaison maintains copies of training sessions, minutes, sign-in-sheets, agendas, and any materials on education of school personnel, community, parents and students.
- Revision, completion and submission of the Consolidated Application. Implementation of the Plan-CLIP. Attend the Stake Holders meetings and report data and opportunities that are available for the districts McKinney-Vento Homeless Students.
- Copies of posters, brochures and a list where the posters are posted in schools and the community. These brochures and posters list the educational rights of homeless children and youth. The materials are distributed at the most common places that homeless families visit, attend or seek help. All materials have the local liaisons and the state coordinators contact information listed.
- The liaison maintains data, academic achievement, living arrangements, etc. on homeless students and unaccompanied youth in the school district. Copy of the LEA policy that identifies homeless children and youth. Copies of meeting minutes, agendas, sign-in sheets and materials on training the community and identifying homeless students.
- School policy on school of origin advising parents of their rights, right to appeal, educational opportunities, and agendas, minutes, materials and sign in sheets concerning school selection.
- Liaison ensures that homeless children and youth are identified, enrolled and have full equal academic opportunities. Maintain copies of enrollment policy, scheduled trainings for personnel on the McKinney-Vento Act, enrollment forms, residency forms, free meal procedures and dispute resolution process in accordance with the state. All policies and forms are reviewed yearly and updated as needed. Liaison has copies of all meeting announcements, minutes, sign-in sheets and e-mails that verify coordination between the coordinator and liaison are in the liaisons office.

- The Liaison works with the Student Information Specialist on system updates and creating reports within the student information system, Infinite Campus. Reports consist of year end data, monthly data, zoning information, etc. of homeless students and unaccompanied youth. The Homeless Liaison works with the Information Specialist to match the homeless totals for FTE Count.
- Liaison coordinates with Title I to serve homeless children and youth under McKinney-Vento and Title I. Copies of all activities, meetings, sign-in sheets and e-mails that verify coordination between the Coordinator and Liaison are in the liaisons office.
- Title I is required to set aside funds within their budgets to meet the needs of homeless students and youth. Funds are set aside in the district budget for homeless students in non-Title I schools. Method #1 is used to determine funding: Identify homeless students' needs and fund accordingly. Funding is based upon the number of homeless students, the support services currently being offered in our schools, and previous year's expenditures.
- LEA provides services comparable to all services offered to all children in the district including Title I programs, Special Ed, language, gifted, talented, vocational, technical and before and after school programs.
- Communication with Principals, Counselors, Registration Department, Social Worker, Transportation, Nutrition and other school personnel occur through meetings, formal and informal individual meetings, emails, or by phone. Communication is two-way, schools call if they have questions or concerns about McKinney Vento budgets, procedures, or any other requirements, and vice versa.
- The Homeless Liaison coordinates with the Richmond Family Connection Children's Cabinet including agencies, churches, businesses and families to ensure services are available to homeless students and unaccompanied youth. A community Resource Guide is available on line and can be printed.
- The liaison maintains an inventory list to track and monitor equipment and property purchased with the McKinney-Vento grant funding. All meeting information and inventory list is filed in the liaisons office located at 864 Broad Street, Augusta, Georgia 30906
- The liaison works with business services, purchasing and payroll department on the procedures for funds available through the McKinney-Vento Grant and Title I for Set Aside funds available. All checks, purchase orders, expenditures and records pertaining to the grant are available in Business Services Department located at 864 Broad Street, Augusta, Georgia 30906. All required signatures are in place.
- A needs assessments is conducted each year to assist in reviewing and revising the McKinney Vento Grant, and planning to support the academic needs of students.
- The Homeless Education Liaison collects data and completes an Evaluation and Continuation Report each year to the Department of Education.
- The Homeless Education Liaison submits a grant application for McKinney-Vento Act to the Department of Education every three years requesting funding.

## **Homeless Liaison Roles, Responsibilities and Unique Qualities**

8.3 The LEA has written procedures for the education of homeless children and youth that identify and remove any barriers. The written procedures must include: (a) Identification (b.) School Selection (c.) Enrollment (d.) Transportation (e.) Disputes

The local liaison serves as one of the primary contacts between homeless families and unaccompanied youth, school staff, district personnel, shelter workers, and other service providers. The liaison coordinates services to ensure that the needs of homeless students and youth are met. Homeless students enroll in school and have every opportunity to succeed academically and in school.

- Homeless children and youth receive educational services for which they are eligible, including Head Start, Even Start, and preschool programs administered by the LEA, and referrals to health, mental health, dental, and other appropriate services.
- Parents or guardians of homeless children and unaccompanied youth are informed of educational and related opportunities available, and are provided with meaningful opportunities to participate in the education of their children.
- The liaison provides school counselors with information on grants, FAFSA, Scholarships, higher education and any information that may be helpful to homeless students.
- Parents, guardians and unaccompanied youth are fully informed of all transportation services, including transportation to and from the school of origin, and are assisted in accessing transportation services if feasible.
- Resolving disputes involving enrollment, transportation, records and any other matters are mediated in accordance with the requirements of the McKinney-Vento Homeless Act.
- Public notice of the educational rights of homeless students is disseminated to locations where parents and youth can readily see them. Parents, school personnel, and others are informed of the rights of homeless children and youth. Through web hosting on line, all homeless forms, policies and the McKinney-Vento Act are available for the public.
- Obtaining immunizations, medical records and birth certificates;
- Working with school staff to make sure that homeless children and youth are immediately enrolled in school pending resolution of disputes that might arise over school enrollment placement;
- Helping to coordinate transportation services and free meals at school for homeless children and youth and providing quality new book bags and school supplies to help students to be prepared for school;

- Collaborating and Coordinating with State Coordinators for the Education of Homeless Children and Youth and the community and school personnel responsible for providing education and related support services to homeless children and youth;
- Understanding of the community, including demographics and social service agencies;
- Creating an environment where students and parents are comfortable in requesting services;
- Knowledge of the Elementary and Secondary Education Act of 2015 (ESSA) and McKinney-Vento Homeless Assistance Act requirements.

## 12.6 Procedures for Providing Awareness and Contact Information for Homeless Liaison

The Richmond County School District provides awareness and contact information for Homeless Liaison through the parent/student handbook. Annually, all employees are required to review the Federal Program Information which includes the Homeless Education program and Homeless Liaison Contact information through Target Solutions.

## **Section 12: Services For Foster Care Children**

ESSA requires that districts provide Foster Care Students the option of remaining in their school of origin while in foster care if it is in the best interest of the students. Richmond County has established a set aside to assist with transportation/energy cost that may occur to meet this requirement.

## **Section 13: Services For Neglected and Delinquent Children (Neglected Set-Aside)**

Richmond County School System has two neglected facilities: Lighthouse Care Center of Augusta, 3100 Perimeter Parkway- Augusta, Georgia 30909 and Taking a Step Beyond, 2011 Brown Rd. Hephzibah, Georgia 30815. Lighthouse Care Center is a Senate Bill 681 School and Taking a Step Beyond is a privately owned residential facility that houses nine male students in grades 6 -12 . Richmond County School System serves the students with Neglected funds as well as Title I Part A allocations. There is a needs assessment conducted with each school to prioritize the school's needs. The funds can be used to provide supplies, materials, technology, software and professional learning. Summer School is offered at Lighthouse Care Center for all students who are at-risk of failing to meet the challenging State academic standards.

The Title I Director and Title I Program Specialist will work directly with Lighthouse Care Center and Taking a Step Beyond to ensure that students are receiving the services discussed in the annual consultation meeting.

Meeting minutes, agendas, technical assistance forms, collaborative planning logs, e-mails, and phone logs will be maintained by the facility Principal, Director, Title I Program Specialist and Title I Director.

Lighthouse Care Center of Augusta and Taking a Step Beyond in November will submit to the LEA source data for the “Annual Survey of institutions for Neglected and Delinquent Children”.

Inventory will be maintained at the LEA. The Neglected and Delinquent facilities will complete an inventory check twice per year at the request of the LEA. Equipment must be inventoried annually to ensure procedures and processes are provided based on Equipment Use, Fraud and Abuse of Title I Equipment and Disposition of Title I Equipment.

No request for reimbursement will be allowed as all purchases must be approved prior to the purchase.

All materials and supplies purchased by the LEA are the property of the LEA. At the time the neglected and delinquent facility no longer participates, the property will be returned to the LEA.

Complaints by the Neglected and Delinquent school are filed in compliance with the LEA compliant process (see Complaint Procedures, Appendix\_\_\_\_). All complaints will be addressed within 10 days of filing and will be resolved within 60 days according to the process.

Evaluation of services of the Neglected and Delinquent facility will take place at the end of May. The LEA will ask the Neglected and Delinquent Schools to fill out a survey to evaluate services provided by the LEA.

#### **Section 15: Prevention and Intervention Programs for Children Who Are Neglected,**

##### **Delinquent, Or At-Risk (Title I, Part D, Subpart 2 Grantees)**

#### **Section 16: Title VI, Part B- Rural and Low-Income Schools Program**

#### **Section 17: Title II, Part A – Supporting Effective Instruction**

#### **Section 18: ESSA: Equity and Professional Qualifications**

#### **Section 19: Title III, Part A – Language Instruction For English Learners and Immigrant Students**

#### **Section 20: Title I, Part C – Education of Migratory Children (MEP) Services**

The Migrant Education Program (Title I Part C) is responsible for providing academic and supportive services to the children of families who migrate to find work in the agricultural and fishing industries.

##### **Definition of a Migrant Child**

**MIGRATORY CHILD** - A migratory child is a child who is younger than 22 years of age and has not graduated from high school or received the GED. The migratory child, parent, guardian or spouse is, a migratory agricultural worker, including a migratory dairy worker, or a migratory fisher, and who, in the preceding 36 months, in order to obtain, or accompany such parent or spouse, in order to obtain, temporary or seasonal employment in agricultural or fishing work:

- (A) has moved from one school district to another;
- (B) in a State that is comprised of a single school district, has moved from one administrative area to another within such district; or
- (C) resides in a school district of more than 15,000 square miles, and migrates a distance of 20 miles or more to a temporary residence to engage in a fishing activity;

#### **RATIONALE/ OBJECTIVE:**

The Richmond County School System seeks to ensure that migrant students have the same free, appropriate public education, including a public preschool education, as provided to other students in the district. The following procedures are designed to facilitate the identification, enrollment and education.

#### **IDENTIFICATION:**

1. The Parent Occupational Survey form is included in the new student registration packets and is completed by the parents or guardians of all new students enrolling in the district.
2. The completed Parent Occupation Survey form is forwarded from the school to the Student Services Department.
3. If “yes” is checked regarding relocation to work within the last three years, in addition to any of the qualifying occupations, the homeless liaison contacts the parent or guardian to determine eligibility for MEP services and an assessment of needs.
4. Services for identified students will be coordinated with existing Title I programs to address instructional and non-instructional needs and resources.

### **MIGRANT EDUCATION PROGRAM FUNDING**

The Georgia Department of Education allocates MEP funds to school districts as formula grants based on the number of migrant students enrolled in the service area. School districts generating small amounts of formula funding may submit a written request for direct allocations. Otherwise, these funds are reserved in the MEP consortium and are managed by Abraham Baldwin Agricultural College and the GADOE. The funds may be requested as needs are identified in the district.

### **MIGRANT PROGRAM EVALUATION**

1. Successful distribution, completion and return of completed Parent Occupational Survey forms.
2. Assessment, referral and delivery of needed services for identified MEP students.
3. Impact of services on MEP students.

### **SECTION 16: INDIVIDUALS WITH DISABILITIES EDUCATION (IDEA) (NOT APPLICABLE)**

## **Section 20: Individuals with Disabilities ACT (IDEA)**