



Barrow County School System

Boldly Committed to Student Success

FY19 Federal Programs Handbook For System and School Administrators

Dr. Chris McMichael, Superintendent

Purpose of This Handbook

The purpose of Federal education program funding under the Every Student Succeeds Act (ESSA) is to provide LEAs and their schools with supplemental financial resources and assistance in order to ensure equitable access to a high quality education, regardless of student economic status or other equity factors.

The purpose of this handbook is to provide a systematic approach to managing the rules and guidelines of all federal programs to ensure consistent compliance. Staff should use the provided information to ensure that all federal programs are being implemented accurately and effectively.

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Federal Programs Calendar

All/Multiple Programs	Title I, Part A	Title I, Part C
Title II, Part A/Professional Learning	Title III, Part A & Immigrant	Homeless
Special Education	Family Engagement	School Improvement

July	
PDC	Review school improvement plans and provide feedback
	Submit CLIP- CNA/DIP/Equity Plan (Window opens 3/1 and ends 8/31)
	Present at bookkeeper training
	Finalize and submit Implementation Plans
Schools	Title I Budgets due on Google Drive by July 15 th
	School Improvement and Parent Involvement Plans shared with staff during pre-planning
	Upload sign-in sheets, minutes, etc. from meetings where SIP was discussed
August	
PDC	Develop and submit budgets to GaDOE
	Meet with building administrators to review updated/revised rules and regulations from conference
	Support APTT meetings
Schools	Paraprofessional schedules due
	Final version of Parent Involvement Plan and School/Parent Compact due to Director of Federal Programs
	Identify English learners for participation in Federally-funded supplemental (i.e., in addition to ESOL services) English language assistance programs. Send parents/guardians of selected students the <i>Title I Parent Notification of Student Eligibility for Supplemental Language Support Services</i> within the first thirty (30) days of the school year.
	Inventory reconciliation
	Verification the Parent Right to Know was given to parents due to Title IIA Coordinator
	Train all staff on topics related to Family Engagement
	Send Parent Involvement Plan and Compact home with ALL students. Send in the Title I Packet or with beginning of the year paperwork. School Improvement Plans should be available for all parents and members of the community to review. Write up how you distributed these plans
	Host Annual Title I meeting with parents; save sign-in sheets and detailed agenda
	Notify parents using multiple ways that school is a Title I school and about the parent resource room
	At SGT meeting, review and approve school-level plans
September	
PDC	Send private school letters for all federal programs
	Deadline for LEAs to submit Title I Part C annual re-sign forms to the regional migrant education offices
	Complete Education for Homeless Children and Youth (EHCY) Annual Homeless Education Survey
	On-site inventory monitoring (ongoing through May)
	Conduct website audit for required plans
	Host fall Parent Advisory Council (PAC) meeting
Schools	Completed School Improvement Plans Published on System and School Websites
	Host Parent Involvement Events
	Host Annual Title I meeting with parents; save sign-in sheets and detailed agenda
	On-site inventory monitoring

	SIP review and approval by Executive Cabinet
October	
PDC	Review system Fraud, Waste, Abuse, and Corruption and Complaint procedures
	Private School Initial Consultation
	Review parent involvement documentation
Schools	FTE count – review schedule and segments
	On-site inventory monitoring
	Submit carryover budgets
	Deadline: Upload documentation of Title I Annual Meeting
November	
PDC	Submit carryover budget
	Host EL family outreach & engagement event
	Host Superintendent’s Title I Reception
Schools	On-site Inventory Monitoring
December	
PDC	Host Winter Parent Advisory Council (PAC) meeting
January	
PDC	Principals’ meeting - Overview of stakeholder planning process
	Education of Homeless Children and Youth Grant Program Monitoring begins and continues through April
	Administer stakeholder surveys
	Host mid-year review with principals
Schools	Complete group periodic certification forms for fully funded federally funded teachers
	Email date for the March school-level stakeholder planning meeting to Paige McGahey
	School improvement plan mid-year review – discuss progress, strategies, budget, documentation
	Receive stakeholder survey links from the district
February	
PDC	Intra-district transfer requests (published in newspaper and on website)
	Administer professional learning survey to all stakeholders, included in CNA (principals, teachers, paraprofessionals and parents)
	Send PowerPoint and templates for the agenda, sign-in sheet, and minutes from district for use in school-level stakeholder planning meeting
	Close CNA surveys and distribute results to schools
Schools	Train all staff on topics related to Family Engagement
	Invite school staff, parents, SGT, and community to the school-level stakeholder planning meeting
March	
PDC	Support schools during the school improvement process
Schools	Hold school-level stakeholder planning meeting
	At the March SGT meeting, share how the SGT participates in the planning process
April	
Schools	Upload scanned copies of spring planning meetings documentation
	Begin work on Root Cause Analysis and School Improvement Plans
May	
PDC	Collect annual periodic certifications
	Update district parent involvement plan
	Host spring Parent Advisory Council (PAC) and Comprehensive Needs Assessment meetings
Schools	Submit semi-annual periodic certifications
	Upload documentation of school-level EL parent outreach activities

	Upload documentation of school-level EL professional learning activities
	Inventory reconciliation
	Continue to work on Root Cause Analysis and School Improvement Plans
June	
PDC	Attend federal programs conference
	Review Implementation Plans
	Host annual parent meeting (district parent involvement plan and CLIP)
	Leadership Summit – provide professional learning and support with school improvement planning
Schools	Title Programs Planning Day - Complete detailed evaluation of previous year's school improvement plan to determine success of previous year's Title I schoolwide program at Title Planning Workshop
	Title Programs Planning Day - Update Parent Involvement Plan using survey results. Include parents on planning committee and save sign-in sheets and agenda showing parent participation
	Needs Assessment Root Cause Analysis Completed before Leadership Summit
	Leadership Summit - Review and revise School Improvement Plan using Comprehensive Needs Assessment data with leadership team. Parent Participation is expected. Save the sign-in sheets and detailed agenda showing their participation
	School Improvement Plans, including Professional Learning Plans, goals and action steps entered onto Google Drive and available for Teaching and Learning review by June 30th
Ongoing	
PDC	Review monthly expenses
	Update system and school websites with Federal Program information
	Review Migrant Educational Program CER and Occupational Survey updates
	Meet with homeless liaison concerning homeless program and needs
Schools	Review budget versus expenditures
	Monthly time and efforts sheets signed and turned in
	Complete and submit periodic certifications for substitute teachers
	Monitor progress of disadvantaged students at-risk of academic failure
	Monitor progress of homeless students
	Host Parent Involvement Events

Monitoring Process & Procedures

The following procedures have been created and designed to provide reasonable assurance regarding the achievement of objectives in the effectiveness and efficiency of operations.

The Georgia Department of Education requires that the Barrow County School System monitor the implementation of federal programs and the expenditure of all funds associated with each program. The specific requirements are as follows:

- (a) Each federal program coordinator will conduct self-monitoring of its schools and programs sufficient to ensure compliance with requirements, including Title I, Part A (Disadvantaged Children), Title I, Part C (Migrant Education Program), Title I, Part D (Neglected and Delinquent), Title II, Part A (Teacher and Leader Quality), Title III (English Learners & Immigrant Students), Title IV, Part A (Student Support and Academic Enrichment) and Title X, Part C (McKinney-Vento Education for Homeless).
- (b) Federal program coordinators will undergo training from GaDOE and other sources to maintain proficiency in program compliance requirements.
- (c) Federal program coordinators will provide technical assistance to local schools.
- (d) Federal program coordinators' self-monitoring will include monitoring all program expenditures to verify that all expenditures comply with program requirements.
- (e) Federal program coordinators will maintain all documentation the LEA may need for future auditing/monitoring.
- (f) In years when LEA does not receive an on-site visit, federal program coordinators will complete the Self-Assessment Checklist and submit it to the Georgia Department of Education (GaDOE) as requested.
- (g) LEA will undergo monitoring by GaDOE on a published cycle. LEA federal program coordinators will participate in training and technical assistance updates as provided by GaDOE prior to monitoring visits.
- (h) 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 federal program coordinator will respond in a timely manner with a Corrective Action Plan, which must be approved by GaDOE. The appropriate GaDOE Program Specialist will monitor implementation of the Corrective Action Plan.

Monitoring is an essential component of ensuring that all facets of federal programs are being implemented as prescribed by the Every Student Succeeds Act (ESSA) under the Elementary and Secondary Act (ESEA). It is a process of systematically providing technical assistance and collecting data in order to provide information that can guide program implementation.

Each federal program in the Barrow County School System makes use of monitoring as a means of regular observation and recording of activities taking place in participating schools. Critical to this process is the feedback provided to schools that can assist in improving student academic achievement. District monitoring addresses the following:

- Ensuring that all activities are carried out in accordance with federal compliance guidelines
- Monitoring inventory and equipment usage
- Attainment of academic achievement school improvement goals
- Compliance with budgetary guidelines

Monitoring by the Georgia Department of Education (GaDOE) consists of four major components:

- Monitoring of Expenditures – Local educational agencies (LEAs) must submit for approval an annual budget through the Consolidated Application process. GaDOE 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, GaDOE Education Program Specialists track how well LEAs are requesting funds for expenditures to ensure that LEAs are likely to meet the expenditure requirements for each federal program.
- Single Audit – LEAs with single audit findings are flagged for technical assistance.
- On-site Monitoring – A GaDOE on-site Cross-Functional Monitoring Team visits the school system to apply the criteria included in a GaDOE monitoring document.
- Self-Monitoring Checklist – LEAs not receiving an on-site visit complete the Self-Assessment Checklist and submit it to the Georgia Department of Education (GaDOE) as requested.

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

- Selection of LEAs to be monitored.
 - LEAs are currently cross functionally monitored on a four-year cycle.
 - LEAs were initially randomly selected from each of Georgia's service areas.
 - LEAs with audit or monitoring findings requiring a return of monies, or receiving a high number of stakeholder complaints 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.

LEA Communication With and Monitoring of Participating Schools

Monitoring of participating schools is a critical component of ensuring that compliance is taking place at each school and within each program. During the first two months of school, system federal program coordinators will convene a meeting with the principals of all participating schools. Principals receive training on policies and procedures and guidance for operating federal programs, including Title I, Part A (Disadvantaged Children), Title I, Part C (Migrant Education Program), Title I, Part D (Neglected and Delinquent), Title II, Part A (Teacher and Leader Quality), Title III (English Learners & Immigrant Students), Title IV, Part A (Student Support and Academic Enrichment), and Title X, Part C (McKinney-Vento Education for Homeless).

Principals are given detailed information on expectations and copies of program guidance. Specific training is provided in all facets of each program. Information is provided to principals related to timelines, budget forms, inventory information, schoolwide implementation, professional learning, parental involvement, fraud policy and other areas of federal programs as appropriate. Quarterly leadership meetings are also held with principals. Specific budget information is given out at these meetings. Phone calls and emails are a weekly, if not daily, occurrence between federal program coordinators and school leaders. This process is monitored through ongoing technical assistance, site visits, and through the budgeting process.

Cycle of Monitoring Schools

All schools benefiting from federal funds are monitored each year to ensure that improvement plans are well written and executed and that items budgeted are directly related to items contained in school improvement plans. In addition, each school is monitored to ensure that accurate records are maintained for all equipment purchased with federal funds. The yearly monitoring includes an assessment of the

following Title programs: Title I, Part A (Disadvantaged Students), Title I, Part C (Migrant Education Program), Title II, Part A (Teacher and Leader Quality), Title III (English Learners & Immigrant Students), Title IV, Part A (Student Support and Academic Enrichment), and Title X, Part C (McKinney-Vento Education for Homeless).

Timeline for Monitoring of Federal Programs

- June-September - Provide a technical assistance session for all participating schools following the GaDOE Federal Programs Conference to update principals on any new guidelines and to provide guidance for new principals. Sessions will include the following topics: budgets, ordering, compliance, parental involvement, professional learning, meeting the needs of students, schoolwide programs, monitoring, academic achievement, inventory, scheduling, ethics, fraud and waste, and complaint procedures. Sessions will include representation from the following programs: Title I, Part A (Disadvantaged Students), Title I, Part C (Migrant Education Program), Title II, Part A (Teacher and Leader Quality), Title III (English Learners & Immigrant Students), and Title X, Part C (McKinney-Vento Education for Homeless).
- June/July - Work with principals on annual revision of compacts and school improvement and parent involvement plans and budgets. All federal program coordinators will review plans and budgets to ensure that funds are being spent according to plans and that plans have all the necessary components.
- July/August - Notify any schools if required to provide intervention services as a result of needs improvement status, assist schools with creating and mailing any required notifications to parents.
- August to June – Meet quarterly with principals. Provide additional training as needed.
- August to December - Inventory items purchased with federal funds. Monitor schools, provide feedback.
- August to June – All federal programs are monitored by the appropriate program coordinator. Ongoing review of school improvement data and plans in conjunction with members of the Teaching & Learning Department
- January/February – Conduct on site mid-year check and/or monitoring visits. Members of the Teaching and Learning Department conduct these checks to ensure school improvement plans and budgets are being implemented with fidelity.
- February/March - Federal program staff attends GCEL conference
- Ongoing - Budgets are reviewed at least monthly and each purchase order is examined by federal program staff to ensure purchases are allocable, reasonable, and necessary and that items purchased are supporting strategies contained in the system and/or school improvement plans.
- February/March – Conduct annual comprehensive needs assessment. Data is provided to system and school leaders so each can compile data to determine prioritized needs for the following year.
- Ongoing – Federal program coordinators provide technical assistance and meet regularly with principals.

Schedules for Monitoring Schools

Schedules for equipment inventory monitoring, progress checks, and compliance with all federal guidelines are created on Google Drive. Available dates are created in a spreadsheet and school leaders choose from the available dates on a first come, first served basis.

On-site Monitoring Procedures

All schools benefiting from the use of federal funds are subjected to ongoing monitoring by the coordinator of each program throughout the school year. Federal program coordinators will conduct on-site monitoring of all schools at least once per school year to ensure compliance with federal program guidelines. In addition, emails, staff meetings, and phone conversations take place throughout the year as a means of providing ongoing monitoring and communication with each school.

Data Review

Data is compiled, reviewed, and discussed during monthly administrative and teaching and learning meetings and at Board of Education meetings. Schools meet and analyze data with the intent of improving instruction. Principals review data with their leadership teams to identify and address areas in need of improvement. All schools have access to system generated data that is stored in a secure networked folder and used during the data analysis process. School leaders discuss this information with all staff to ensure they fully understand the data presented.

Identification of High Risk Schools

Any school with one or more ratings of “Does Not Meet” on the Barrow County School System Federal Programs LEA Monitoring of Schools Form will be considered High Risk. In addition, any school receiving five or more ratings of “Needs Improvement” will be considered High Risk.

Verification of Implementation of Required Corrective Action

Corrective actions, findings, areas of concern, and recommendations received through monitoring feedback are discussed with principals in order to assist them in understanding the critical need for compliance with federal guidelines. Professional learning is provided based on needs. In addition, professional learning is used as a preventive measure to ensure that all personnel have a clear understanding of all expectations for every facet of the various federal programs. Federal program coordinators, along with other district level staff and outside consultants, provide ongoing training as a means of ensuring that the system and schools are in compliance at all times. Upon completion of onsite visits, federal program staff documents areas in need of completion and/or correction and communicates this information to school principals, clearly articulating required actions with due dates.

Technical Assistance

Technical Assistance is offered at all times through email and phone communication, as well as school visits, to assist schools in analyzing data to identify priorities in instruction, professional learning, and effective budgeting. Prior to the start or shortly after the beginning of the school year, a principals’ meeting is held that reviews the purpose of all federal programs, as well as expectations and procedures related to allowable use of funds. A second principals’ meeting is held mid-Spring to remind principals of end of the year information and to provide preliminary information related to the upcoming budget year. Documentation of professional learning sessions, technical assistance, and meetings is maintained by the appropriate federal program coordinator. Ongoing monitoring after training is conducted by the appropriate system federal programs coordinator to ensure compliance.

Comprehensive Needs Assessment Process to Inform CLIP, Equity, and School Improvement/Schoolwide Plans

The Barrow County School System utilizes a variety of data sources to make decisions that will affect student learning and teacher effectiveness. Our needs assessment process includes examining student achievement data, perception data from stakeholder surveys, professional learning plans, teacher recruitment and retention data, highly qualified teacher and paraprofessional data, class size data, TKES data, and verbal input from stakeholders. In March, each school conducts a Comprehensive Needs Assessment Stakeholder meeting that includes parents, teachers, paraprofessionals, administrators, community members, School Governance Team members, and other support staff. Once the input is collected from the schools, a series of meetings are held at the school and district levels to consider all the prior stakeholder input and data and to make decisions regarding prioritized needs and equity concerns. The culminating activity from the various meetings involves completion of a school comprehensive needs assessment document. Stakeholders participating in our needs assessment process include members of the Teaching and Learning Department, administrators and teachers from each level, paraprofessionals, instructional coaches and counselors, parents, community members, School Governance Team members, and higher education representatives. The results of this needs assessment determine any prioritized areas of need/inequity and guide the development of the various documents and parts that make up the Comprehensive LEA Improvement Plan (CLIP), Equity Plan (as part of the CLIP), and each schoolwide plan and provide focus for the expenditure of funds.

Needs Assessment Process Calendar

January

- Principals' meeting - Overview of stakeholder planning process
- Receive stakeholder survey links from the district
- Administer stakeholder surveys
- Email date for March school-level stakeholder planning meeting to Family Engagement Specialist

February

- Invite school staff, parents, SGT, and community to the school-level stakeholder planning meeting using Parent Link, flyer, email, website, newsletter, newspaper, translated notices, etc.
- Receive PowerPoint and templates for the agenda, sign-in sheet, and minutes from district for use in school-level stakeholder planning meeting
- Parent survey remains open for schools to enter responses from paper surveys
- Receive stakeholder survey data from the district office

March

- At the March SGT meeting, share how the SGT is participating in the planning process
- Hold school-level stakeholder planning meeting
 - Use PowerPoint from district to guide the planning process
 - Discuss and respond to questions in the PowerPoint
 - Solicit input from stakeholders for addressing identified needs
 - Document the meeting (must use provided templates)
 - Sign-in sheet, including each attendee's role (parent, para, SGT, teacher, etc.)
 - Agenda, Copies of data reviewed, other handouts
 - Minutes (must include details of the discussion)

April

- Upload scanned copies of the following documentation to Google Drive:

- o Documentation of parent, faculty and staff, SGT, and community invitations to the school-level stakeholder planning meeting
 - o Documentation of invitations to stakeholders to participate in the appropriate survey for that group (teachers, paras, administrators, parents)
 - o Documentation of school-level stakeholder planning meeting
 - Sign-in sheet, including each attendee's role (parent, SGT, teacher, etc.)
 - Agenda
 - Copies of data reviewed, other handouts
 - Minutes
 - Stakeholder input (responses to the questions in the PowerPoint)
 - Work on updating CLIP, Equity, and School Improvement Plans with leadership teams
- May
- Continue to work on and finalize CLIP, Equity, and School Improvement Plans
- June
- Completed school-level plans uploaded in Google Drive for System Leadership Summit
 - School Improvement Plans, including Balanced Scorecards, complete in Google Drive and available for Teaching and Learning Department and Executive Cabinet review and feedback.
 - Upload Streamlined CLIP components, including the Equity Plan to GaDOE portal
- July
- Members of the Teaching and Learning Department and the Executive Cabinet will approve/request changes
- August/September
- At SGT meeting, review and approve school-level plans and district-level program plans

Guidance to Schools/Departments

All components of the CLIP are required prior to the district receiving funding from federal programs. CLIP revisions take place annually using prior year data and needs assessment information. The CLIP serves as the plan detailing coordination of various federal programs and identification of needs and in-turn budgeting for such needs with federal funds. Department directors, coordinators, specialists, school and system leaders, as well as community and parent stakeholders are involved in the revision process. Parents are sent information inviting them to participate via email, telephone, newspaper, social media, flyers, website, and 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 and parent stakeholder meetings. 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. Several subsequent meetings are arranged to garner input from all stakeholders. For example, input is solicited from district, school, and curriculum leaders at monthly administrative and curriculum meetings. Federal program coordinators gather all input and update the various components of the CLIP. The plan is submitted to the Superintendent for final approval.

Review and Approval Process

Barrow County's designated administrators are responsible for conducting an annual review of the CLIP components, at which time revisions are made. The Barrow County School System is committed to cultivating and sustaining partnerships with parents and community stakeholders, and encourages their participation in the development, implementation, review and evaluation of its Comprehensive LEA Improvement Plan (CLIP) and all of the components therein. All parents of Barrow County School System's students are provided multiple opportunities to be involved in the development and revision of the system's CLIP. These

opportunities include access to the components of the CLIP during various meetings, at a district-wide parent meeting held in the fall, and at spring school-based Title planning meetings.

CLIP Schedule/Timeline

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

- August-July - The newly approved CLIP is made available on the district web site. A feedback form is provided on the web.
- August-July – The newly approved CLIP is made available to parents in a parent information notebook at the front desk of each school. A printed feedback form is provided in each notebook.
- August-October – The current CLIP is made available during a district parent meeting.
- February-April – The current CLIP is made available during school Title I Planning Meetings and opportunities are provided on paper and online for feedback. Survey responses will be collected as part of the annual Comprehensive Needs Assessment.
- May-June – Changes are made to the CLIP based on feedback obtained from multiple means and stakeholders.
- June – The CLIP is uploaded for GaDOE approval.

Resolution for Unapproved Plans

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

Evidenced-Based Practices and Interventions

Definition

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

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

Implications

During the annual Title Programs Planning Workshop held each June, school leadership teams identify and record the extent to which the activities, strategies, and/or interventions contained in their school

improvement/schoolwide plans meet the various levels of qualifying as being evidence based: strong, moderate, promising, or otherwise provide a rationale for improving student outcomes. This information will be documented in each school improvement plan.

Internal Controls

Code of Federal Regulations

The Barrow County School System operates their federal grants in accordance with the [Code of Federal Regulations](#).

Cash Management (CFR 200.302(b)(6)) (CFR 200.305) & Drawdown of Funds (CFR 200.305(b)(3))

Funds are drawn down based on actual program expenditures. It is the responsibility of the appropriate federal program coordinators and the Assistant Superintendent of Business Services or their designee to work cooperatively to review all expenditures on a monthly basis after budget approval before funds are drawn down from GAORS. Moreover, the following practices are observed:

- Coordinators for each federal program must reconcile their respective budgets monthly to ensure that all expenditures charged to their program are allowable.
- The Assistant Superintendent of Business Services or designee will perform periodic reviews of the general ledger, including federal accounts and fund sources.
- The Accounting Specialist runs a monthly report out of the financial software (Munis) to drawdown funds. Each federal program coordinator will sign a printed copy, verifying the accuracy of the report.
- Funds are drawn down monthly based on actual expenditures and on a reimbursement basis only.
- The Assistant Superintendent for Business Services reviews, signs and dates the report.
- The Accounting Specialist logs into the appropriate agency.
- When the drawdown is received into the district's bank account, the Accounting Specialist will create a journal entry in the accounting software. The Assistant Superintendent for Business Services will review, approve and post the journal entry to the general ledger.
- The system Accounting and Audit Coordinator and/or Assistant Superintendent for Business Services reconciles all bank statements and performs periodic review of the general ledger.
- There is no cash involved as all drawdowns are directly deposited into the system's bank account.
- Federal program coordinators ensure that equipment/supplies are purchased and received during the period of performance of the grant award.
- The school system does not request advance payments for federal fund disbursements, only reimbursements.
- All reporting documentation is kept in Business Services and is available for review upon request.

At year end reconciliation for GAORS grants, a report is printed from the accounting software (Munis) along with the Consolidated Application, and the Federal Program Coordinator reviews and signs off that the completion report may be entered. After data is entered, the reports are given to the Assistant Superintendent of Business Services for review and approval. The Accounting Specialist will then submit to GaDOE. The original is kept on file in Business Services and a copy is made for the Federal Program Coordinator's file for monitoring.

Allowability of Costs (CFR 200.302(b)(7))

Any purchases made with federal funds must follow the guidelines for allowable costs. The Barrow County School System Office of Federal Programs will follow guidelines as detailed in EDGAR, OMB Circulars (such as A-87), and applicable memos, letters, handbooks, and/or communication regarding allowable/unallowable purchases provided by the Georgia Department of Education. The appropriate program coordinator will direct any questionable expense to the GaDOE Area Program Specialist for that program for further clarification.

Federal funds cannot be used to purchase incentives for students, teachers, or to entice participation in professional learning activities. Food for parent involvement activities must be considered "light refreshments." Light refreshments has been defined as donuts, fruit, muffins, juice, coffee, chips, pretzels, popcorn, raw vegetables and dip, nuts, cookies, brownies, punch, soda, and water. Light refreshments does not include pizza, sandwiches, or anything that could be considered any part of a meal. Federal funds can only be expended for events that "build capacity." Thus, it would be allowable to fund a snack for a workshop teaching parents a specific skill, but would not be allowable to provide snacks to parents volunteering.

Financial Management ~ Authorization of Expenditures and Prior Approval of Purchases

The following procedures must be followed to ensure the proper handling of federal funds:

1. Each budget, after prepared at the system or school level, is reviewed by the appropriate program coordinator, revised as necessary, and approved by the program coordinator. Once the system or school makes the necessary changes and the budget is submitted and approved by the GaDOE, each department or school completes requisitions in the school system financial software.
2. Requisitions must include:
 - Complete vendor information including phone number (and fax number if applicable)
 - Ship to information including the address for the school
 - Appropriate account number assigned by the system coordinator, principal or designee based on the budget sheets
 - Sufficient detail to determine if each cost item is allocable, reasonable, and necessary.
 - If a requisition is between \$3,500 and \$4999, two quotes must be obtained and attached to the requisition in the financial software. If a requisition is between \$5,000 and \$9,999, three quotes must be obtained and attached to the requisition in the financial software.
 - If the requisition is over \$10,000 three or more written bids must be obtained and must be reported to the Board of Education by the Assistant Superintendent for Business Services.
 - If the requisition is over \$25,000 the requisition must be approved by the Board of Education.
 - No purchase or contract shall be divided into parts for the purpose of avoiding the above requirements.

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

3. The appropriate federal program coordinator reviews the requisition to assure that the purchase is included in the Schoolwide/School Improvement Plan/Equity Plan and that the expense is allocable, allowable, reasonable, and necessary.
4. If approved, the program coordinator then signs off on the requisition which forwards the requisition to the Office of Business Services for approval and conversion to a purchase order using the financial software program.
5. If rejected, a reason is entered in the Rejection Statement field that is then visible at the system and school level.

6. The Assistant Superintendent for Business Services issues final approval and the financial software automatically sends the approved purchase order to the originator of the requisition/purchase order (usually the school bookkeeper) to place the order.
7. When the ordered item arrives, the school or department compares what is received with what was ordered and “receives” the item or items in the financial software. Any disputes are reconciled between the school bookkeeper and the vendor.

Invoices

The following procedures are followed for invoices:

- Receipt of Invoice: Invoice is received by district receptionist and forwarded to Account Payable Specialist.
- As stated above, the school bookkeeper will match the order as he or she receives it with the purchase order and will “receive” it in the financial software. The purchase order cannot be paid unless the item is received in the system.
- The Accounts Payable Specialist compares vendor invoices to purchase orders. If these items match, the invoice is entered as an accounts payable. If not, the Accounts Payable Clerk Specialist alerts the appropriate program/school bookkeeper or the appropriate program coordinator who work together to determine a solution.

Payment of Invoice:

The following procedures are followed for payment of invoices:

- The Accounts Payable Specialist charges the expenditures to the proper fund/program designated on the purchase order by the program/school bookkeeper or coordinator in the system financial software.
- If invoices received that are charged to a federal program exceed the amount of purchase orders, the Accounts Payable Specialist alerts the appropriate program/school bookkeeper who work together with the coordinator and determine a solution.
- Disbursement is not made until the invoice is validated as owned by the district and received on the system by the location/bookkeeper.
- Open purchase order reports are provided by Accounts Payable or Purchasing Specialist to the federal programs bookkeeper/coordinator monthly and upon request to determine if goods or services have in fact been received but not invoiced by the vendor. Contact is made with the vendor to secure an invoice if such instances are noted.

Equipment Management (CFR 200.313(d))

An inventory of tangible personal property having a useful life of more than one year will be maintained at the system and/or school level. This includes all items purchased under state object codes 615 (expendable equipment) and 616 (expendable computer equipment). Inventories will be maintained on a spreadsheet hosted on Google Drive that at minimum includes the following: description of property, serial number or other identification number, funding source, FAIN number (on grant award), acquisition date, purchase price, location of asset, disposal date, sale price of property.

Inventory of all equipment and property belonging to any federal program will be identified and inventoried once yearly. The appropriate federal program coordinator will randomly check equipment annually. It is also recommended that a building-level administrator verify an inventory of items purchased with federal funds each spring. Materials purchased for use in federal programs will be properly labeled and utilized in the

capacity for which it was purchased. Any equipment, materials and/or supplies purchased with federal funds are considered solely for the use of that program.

Equipment Disposition Policy

The following guidelines must be followed:

- Once a piece of equipment that was purchased with Title funds is no longer being used for its originally intended purpose, it can be designated as surplus. Once designated as surplus, the item can be used for a different purpose outside of Title guidelines. School-based representatives must request approval from both the principal and the appropriate Title coordinator before items are designated as surplus so that a consensus is reached that the original purpose or intent has been met. An email is sufficient to achieve this.
- Items that are no longer usable will be disposed of.
- A disposition form must be completed for any item that is declared surplus because it has met its originally intended purpose or because it is no longer usable. Disposition forms are located in each school's Google Title Programs Inventory folder.
- The date of disposition must be entered on the inventory sheet on Google Drive.
- Once a disposition form has been completed and the disposition date has been entered onto the inventory form, the item can be repurposed or disposed of. However, the item must remain on the inventory sheet for five years from the date of disposition before it can be removed from the inventory spreadsheet.

The school system does not lease equipment using Title funds. The school system does not have any targeted assistance schools.

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

1. File an incident report with the School Resource Officer (SRO).
2. Attach the incident report to a Disposal Form and upload in the appropriate folder on Google Drive.
3. Make corrections to the inventory on Google Drive.
4. Send an email notifying the appropriate federal program coordinator that the inventory has been updated.

Monitoring of Equipment

All equipment purchased is monitored by the appropriate system-level federal program coordinator and school-level administration or their designee(s). All equipment purchased by schools is properly labeled with an identification number and documented on the inventory sheet on Google Drive.

District-level fall physical inventory: The appropriate federal program coordinator of each funding source or designee will complete a physical inventory check at each facility annually, beginning in the fall. Purchase orders are pulled from object codes 615, 616 to verify each item is included in the inventory, is located as assigned, and is being used for the intended purpose. The appropriate federal program coordinator of each funding source will summarize with each principal and school level inventory contact the results of the inventory monitoring check.

Conflict of Interest (CFR 200.318(c))

Employees of the Barrow County School System who are engaged in the selection, award and administration of contracts shall abide by the following:

- No employee, officer, or agent may participate in the selection, award, or administration of a contract supported by a federal award if he or she has a real or apparent conflict of interest.
- Such a conflict of interest would arise when the employee, officer, or agent, any member of his or her immediate family, his or her partner, or an organization which employs or is about to employ any of the parties indicated herein, has a financial or other interest in or a tangible personal benefit from a firm considered for a contract.
- Officers, employees, and agents of the Barrow County School System may neither solicit nor accept gratuities, favors, or anything of monetary value from contractors or parties to subcontracts.
- Violation of these standards will result in reporting of said personnel to the Superintendent of Schools and if appropriate, local authorities. Any misconduct could result in suspension, loss of employment, and any other consequences that are applicable by law.
- Any violation of these procedures must be disclosed in writing, in a timely manner. All violations of federal criminal law involving fraud, bribery, or gratuity violations potentially affecting the federal award must be reported as failure to make disclosures can result in (remedies for noncompliance, including suspension and debarment).

Board Member Conflict of Interest, Policy BHA

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

Financial Governance

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

matter pending before the local school system in which he or she serves or in any proceeding involving the local school system in which he or she serves.

6. No Board member shall be prohibited from making an inquiry for information on behalf of a constituent if no fee, reward, or other thing of value is promised to, given to, or accepted by the local board of education member or any of his or her immediate family members in return therefor.
7. No Board member shall be deemed in conflict with these provisions if, by reason of his or her participation in any matter required to be voted upon by the local board of education, no material or monetary gain accrues to him or her as a member of any profession, occupation, or group to any greater extent than any gain could reasonably be expected to accrue to any other member of that profession, occupation, or group.
8. No Board member may also be an officer in any organization that sells goods or services to that local school system, except as provided in Code Section 20-2-505 and excluding nonprofit membership organizations.
9. No Board member shall be deemed in conflict with these provisions if, by reason of his or her participation in any matter required to be voted upon by the local board of education, no material or monetary gain accrues to him or her as a member of any profession, occupation, or group to any greater extent than any gain could reasonably be expected to accrue to any other member of that profession, occupation, or group.
10. No Board member shall sell to any county board any supplies or equipment used, consumed, or necessary in the operation of any public school in this state unless there are fewer than three sources for such supplies or equipment within the county; provided, however, that any purchase pursuant to this subsection for supplies or equipment that is equal to or greater than \$10,000.00 shall be approved by a majority of the members of the board in an open public meeting. Any member violating this shall be guilty of a misdemeanor.
11. No local board may do business with a bank or financial institution where a Board member is an employee, stockholder, director or officer when such member owns 30% or more stock in that institution.
12. No Board member may have a financial interest in school buses, bus equipment or supplies, provide services for buses owned by the Board, or sell gasoline to the Board from a corporation in which the Board member is a shareholder.
13. No Board member shall accept a monetary fee or honorarium in excess of \$101.00 for a speaking engagement, participation in a seminar, discussion panel, or other activity which directly relates to the official duties of that public officer or the office of that public officer. Actual and reasonable expenses for food, beverages, travel, lodging, and registration for a meeting which are provided to permit participation in a panel or speaking engagement at the meeting shall not be monetary fees or honoraria.

Conduct As Board Member

1. No Board member shall disclose to or discuss with any information which is subject to attorney-client privilege belonging to the local board of education to any person other than other Board members, the Board attorney, the local school superintendent, or persons designated by the local school superintendent for such purposes unless such privilege has been waived by a majority vote of the whole Board.
2. No Board member shall vote on the employment or promotion of any of his or her immediate family members. No immediate family member of a Board member may be employed or promoted unless a public, recorded vote is taken separately from all other personnel matters.
3. No Board member may be employed in any position in the school district in which they serve.
4. No Board member shall hold another county office.
5. No Board member shall be employed by the State Department of Education or serve concurrently as a member of the State Board of Education.

6. No Board member shall serve on the governing body of a private elementary or secondary educational institution.

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

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

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

Each person offering his or her candidacy for election as a member of a local board of education shall file an affidavit with the officer before whom such person has qualified for such election prior to or at the time of qualifying, which affidavit shall affirm that he or she meets all of the qualifications required pursuant to this subsection. This subsection shall apply only to local board of education members elected or appointed on or after July 1, 2010.

Procurement (CFR 200.319(c)) and Technical Evaluations (CFR 200.320(d)(3))

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

- Incorporating a clear and accurate description of the technical requirements for the material, product, or service to be procured. The description must not, in competitive procurements, contain features which unduly restrict competition. The description may include a statement of the qualitative nature of the material, product or service to be procured and, when necessary, must set forth those minimum essential characteristics and standards to which it must conform if it is to satisfy its intended use.
- Avoid providing detailed product specifications.
- When it is impractical or uneconomical to make a clear and accurate description of the technical requirements, a "brand name or equivalent" description will be used as a means to define the performance or other salient requirements of procurement. The specific features of the named brand which must be met by offers will be clearly stated.
- Identify all requirements which the offers must fulfill and all other factors to be used in evaluating bids or proposals.
- Ensure that all prequalified lists of persons, firms, or products which are used in acquiring goods and services are current and include enough qualified sources to ensure maximum open and free competition. Also, the school system will not preclude potential bidders from qualifying during the solicitation period.

Each federal program coordinator and/or department head checks Georgia's System for Award Management (SAM) website, <https://www.sam.gov/portal/SAM/##11> prior to approving any purchase equal to or in excess of \$25,000 to ensure the vendor is not on the list of suspension and debarment. The resulting check must be printed, signed, dated, and uploaded to the requisition/purchase order.

When spending federal funds, employees of the school district shall engage in comparative buying and obtain bids and quotes whenever appropriate.

Micro-purchases, those less than \$5,000, do not require solicitation of competitive quotations. Services, supplies or equipment estimated to cost \$5000 or more will require three written quotes or website

references. Evidence of the quotes must be attached to the purchase order/requisition in the financial software program. Three written bids or more must be obtained on all services, supplies or equipment estimated to cost between \$10,000 and \$25,000 and these purchases must be reported to the Board of Education. If purchases are made through RESA or State Contract, compliance with the above procedures are not required.

Competitive proposals or bids twenty-five thousand dollars (\$25,000) or greater shall be approved by the Board of Education. Competitive proposals or bids ten thousand dollars (\$10,000) or greater shall be approved by the Board of Education if the low bid is not recommended. Purchases between \$10,000 and \$25,000 shall be reported to the Board at its next meeting. In compliance with Section 2 CFR 200.319, any purchases in excess of \$150,000 including contract modifications will require a cost or price analysis, sealed bids, and/or competitive proposals. Cost analysis means evaluating the separate cost elements that make up the total price, including profit. Price analysis generally means evaluating the total price.

Sole source bids may be used only when one or more of the following circumstances apply:

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

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

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

Contracts binding the school district can be made only by the Board or the Superintendent or approved agent.

Consultants, Contracts, Purchased Services for Federal Funds

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

- Contracts are generated by appropriate federal program coordinator.
- Specific duties are specifically spelled out for each contract.
- The person must also submit to be fingerprinted if they are working with students.
- If the contract is with a TRS retiree the individual must be approved yearly through the Planning and Personnel Department prior to beginning services.
- The contract includes the number of hours to work and the rate of pay.
- Principals must submit tutoring time logs based on the payroll deadlines from the Business Services Department.

Each contract is signed by the following: contractor, principal (if school-based), and the appropriate federal program coordinator. The Assistant Superintendent for Teaching and Learning provides oversight in ensuring that all contractors' work is complete and that subrecipient requests have been evaluated before funds are released for reimbursement. Artifacts, daily sign in sheets, and completion of all workshops are kept on file by the appropriate federal program coordinator. The appropriate federal program coordinator

signs off on all invoices/contracts prior to the issuance of payment for services. These contracts must be maintained and kept by the appropriate federal program coordinator.

Suspension & Debarment (CFR 180.220 & CFR 200.213)

Each federal program coordinator and/or department head checks the System for Award Management ([SAM website](#)), prior to approving any contract or subcontract expected to equal or exceed \$25,000 to ensure the vendor is not on the list of suspension and debarment. Our district cannot and does not purchase from any vendor or contracted person/company identified on this website as being suspended or debarred. Evidence of the verification will be in the form of a search result screenshot printed, signed, dated, scanned, and attached to the requisition/purchase order.

Compensation

Payroll

Federal program coordinators work with the Planning and Personnel Department and Business Services Department to ensure payroll reports are accurate. In addition, each program coordinator ensures that the number of federally-funded employees is consistent with the approved application. Monthly payroll reports, expenditure summary and detail reports, and substitute reports will be used to ensure that each object code is accurate.

Contracted Services

The Assistant Superintendent for Teaching and Learning and applicable federal programs coordinators work with the Personnel and Planning Department and Business Services Department to ensure compliance and accuracy. Each program coordinator ensures that contracts are fulfilled, budgeted correctly, and that services were provided in accordance with the purchased services contract.

Time and Effort

Charges to a federal fund for salaries and wages must be based on records that accurately reflect the work performed. A time sheet must be maintained by any employee who provides supplemental instruction outside of school hours. The appropriate federal program coordinator will ensure that an annual periodic certification or personnel activity report will be maintained for all employees paid with federal funds

Periodic Certification

An annual periodic certification will be maintained for any employee who worked on one federal grant or one cost objective (job). These certifications will be completed after-the-fact. The certification will be completed at the end of June (or on the last contracted day of the school year for employees who do not work year-round). The forms are signed and kept on file in the office of the appropriate federal fund coordinator.

Personnel Activity Report (PAR)

A PAR will be maintained for any employee who works on more than one federal grant and more than one cost objective (job). Split-funded personnel paid with federal funds are required to maintain monthly time logs on Google Drive. The logs are shared among the employee, his or her supervising administrator, and the appropriate federal program coordinator.

Stipends

Stipends will be paid for off contract time at the rate of \$20 per hour for certified staff. The appropriate federal program coordinator will maintain the appropriate paperwork to ensure employees are adequately compensated.

Leave Policy

This policy shall apply to all benefits-eligible employees of the Barrow County Board of Education (“the Board”). All employees are required to follow the appropriate work calendar established by the Board for their positions and may take leave from work only in accordance with this policy or other leave policies enacted by the Board. Unless otherwise provided by the Board, principals and other supervisors are not authorized to rearrange the work calendars of employees. Deductions in pay will be made for absences not covered by this policy.

ACCRUAL OF SICK LEAVE AND ABSENCE FOR MEDICAL AND RELATED REASONS

Each benefits-eligible employee of the Board shall be allowed to earn sick leave, with full pay, computed on the basis of one and one-fourth (1 1/4) working days for each completed month of service. All employees may accumulate unused sick leave from one fiscal year to the next up to a maximum of one hundred and thirty (130) days, although the Teacher Retirement System of Georgia allows participating employees to accumulate an unlimited number of unused sick leave days for credit toward retirement. Sick leave accumulated by a certificated employee or bus driver is transferable from one school system to another, up to a maximum of forty-five (45) days. When employees transfer to the Barrow County School System from another public school system, any transfer of leave must take place within one year of separation from the previous position. It is the employee's responsibility to request and confirm this transfer from the former system. Accumulated leave earned by a certificated employee must be forfeited if such employee withdraws from service for twelve or more consecutive months, but such forfeited leave may be reinstated in accordance with the provisions of O.C.G.A. § 20-2-850. Accumulated leave earned by a bus driver under O.C.G.A. § 20-2-1110 must be forfeited if the driver withdraws from service for twenty-four (24) or more consecutive months.

Sick leave may be used upon the approval of the Superintendent or designee for absence due to personal illness or injury, exposure to contagious diseases, or for absences necessitated by illness or death in the employee's immediate family.

For any absence in which sick leave is used, the Superintendent or designee may require a physician's certificate stating that the employee is ill and is unable to perform his or her duties. In the event that sick leave is used to care for a member of the immediate family, the Superintendent or designee may require a physician's certificate stating that the employee is needed to care for the sick family member. If an employee is absent for three (3) consecutive days of sick leave, a physician's certificate may be required at the discretion of the Superintendent or designee.

For the purposes of absences for medical and related reasons, members of the immediate family are defined as spouse, children, parents, siblings, in-law equivalents of the same, grandparents, grandchildren or any dependent as shown in the employee's most recent tax return.

SICK LEAVE DONATIONS BETWEEN EMPLOYED SPOUSES

An employee may donate up to ten (10) days of sick leave to his/her spouse who is also an employee of the school district for purposes of maternity leave, illness, or illness or death of a family member.

FAMILY AND MEDICAL LEAVE ACT (FMLA)

See board Policy GBRIG.

UNPAID MEDICAL LEAVE

This benefit is provided to employees who:

1. have been employed with the school district for at least twelve (12) school months; and
2. are unable to return to work due to a personal medical necessity or that of a spouse or child; and
3. are at the end of an approved FMLA leave, or are not FMLA-eligible; and
4. have exhausted all paid leave; and
5. provide appropriate medical documentation.

If the unpaid medical leave is granted, the leave will be from the system and not from a specific job assignment.

Any benefits-eligible employee who meets the above criteria may request unpaid medical leave. Unpaid medical leave may be granted for a period of time up to one hundred and thirty (130) scheduled work days or until the end of the school year, whichever occurs first, and shall be inclusive of any previously used FMLA, sick or other BCSS leave by the employee.

The employee on unpaid medical leave may continue as an active employee of the school district with all rights afforded to active employees with the exception of benefit premium payments, which must be paid by the employee and is inclusive of both the employee premium and any appropriate employer subsidy rate or employer contribution. Failure to make such payments will result in a lapse and forfeiture of the benefit in question.

Upon designation of unpaid medical leave status, the employee's previous position will be declared a vacant position and may be filled.

Prior to returning to work, employees on unpaid medical leave will be required to submit a health care provider's certification that verifies the employee's ability to return to work and perform the essential functions of his/her position.

An employee who has been granted unpaid medical leave may return to active employment upon written request for reassignment and contingent upon a vacancy for which he/she is qualified. Requests should be submitted as soon as an employee knows that he/she plans to return to work.

An employee granted unpaid medical leave will be considered for any vacancy for which he/she is qualified. Return to work may be delayed until the beginning of a semester or fiscal year as deemed appropriate by the school system. Classified employees who are unable to return to work at the end of the unpaid medical leave may be separated from employment. Certificated contract employees who are unable to return to work at the end of the unpaid medical leave shall have whatever rights due process provides for such employees.

PERSONAL AND PROFESSIONAL LEAVE

During any school year, personnel may utilize up to a maximum of three days of any accumulated sick leave for personal or professional reasons if prior approval of their absence is given by the local school superintendent or his authorized representative; provided, however, that the absence is not in conflict with a local board of education policy concerning school days on which the presence of the personnel requesting absence is essential for effective school operation. Such leave will not be approved during system-mandated testing. Leave requests during the first and last week of school should be made for emergency situations only.

No grant of approval for an absence permitted under this section shall be conditioned upon disclosure of the specific purpose for which such absence is sought, nor shall any such grant of approval be withheld or denied because of the failure or refusal of personnel to disclose the specific purpose for which such an absence is sought; provided, however, that personnel may be requested to state whether the absence is sought under the category of "personal" or "professional" absence.

Professional leave taken at the request of the school district or when required in conjunction with the district's routine professional development or training activities will not be charged against the employee's sick leave.

OBSERVANCE OF RELIGIOUS HOLIDAYS

Employees may use personal leave and vacation leave for the observance of recognized religious holidays. If an employee desires to take leave for the observance of recognized religious holidays in excess of the days allowed for personal leave or vacation leave, the employee may take unpaid leave for such purposes, provided that such leave is not excessive and does not interfere with fulfilling the obligations of his or her job.

JURY AND WITNESS LEAVE

Each employee shall be allowed leave with pay for the purposes of serving as a juror in any court or when attending a judicial proceeding in response to a subpoena or other court order or process that requires the employee's attendance at the judicial proceeding in a work-related matter. Jury and/or witness leave shall not be deducted from an individual's accumulated personal, professional or sick leave. No employee utilizing jury or witness leave shall be required to pay the cost of employing a substitute to serve during his or her

absence for such leave. Employees who serve on juries or who are subpoenaed to attend a judicial proceeding in a work-related matter may keep any jury/witness pay they receive.

MILITARY LEAVE

All employees are entitled to paid leave not to exceed eighteen (18) days in any one federal fiscal year for the purpose of complying with ordered military duty with the armed forces of the United States or State of Georgia, including duty as a voluntary member of the National Guard or any reserve component of the United States or State of Georgia. Employees are entitled to leave not exceeding thirty (30) days in any one (1) federal fiscal year if ordered to duty as a result of the declaration of any emergency by the governor or appropriate officials of the United States Armed Forces. Employees who have military commitments shall inform the Superintendent or designee annually, provide a copy of the official military orders, and cooperate to the extent possible in scheduling such leave so as to minimize the disruption in those employees' duties and the mission of the Board of Education.

BEREAVEMENT LEAVE

In the event of a death in the immediate family of an employee, up to three (3) days of sick leave per death will be granted. Bereavement leave will be charged against the employee's accumulated sick leave. Employees may use personal leave for absence due to death of individuals other than immediate family members upon approval of the Superintendent or designee. If the employee desires to take bereavement leave in excess of the days allowed for personal leave, the employee may request to take vacation leave or unpaid leave.

For the purposes of bereavement leave, members of the immediate family are defined as spouse, children, parents, siblings, in-law equivalents of the same, grandparents, grandchildren or relatives living in the employee's household.

DISCLAIMER

To the extent that any provision in this policy conflicts with or is superseded by the Family and Medical Leave Act ("FMLA"), the regulations promulgated thereunder, or any other federal or state law, the provisions of the applicable law or its regulations, as the case may be, shall control.

Substitutes for Teachers and/or Paraprofessionals

Schools must provide documentation monthly verifying the names of substitutes, teachers or paraprofessionals names for whom the substitutes are working, time, date, and the reason for the teacher and/or paraprofessional absence.

Job Descriptions

Job descriptions will developed, maintained, and provided to the GaDOE for approval for all positions paid with Title funding.

Travel Policy (CFR 200.474(b))

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

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

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

- A travel expense form must be completed in its entirety in order to receive reimbursement for expenses.
- Employees are responsible for ensuring that expenses claimed in the travel expense report are proper, accurate, and incurred for official business. A traveler who knowingly presents a false or fraudulent claim may be subject to penalties under criminal statutes.
- Employee completes and sends the "Travel Expense Statement" to the building/facility administrator for approval. The building/facility administrator or his/her designee verifies the information on the form and once deemed accurate, enters the information into the system financial software. Failure to request reimbursement within 45 days of travel may result in a loss of or reduction of funds.
- Principal approves the requests. All federal program coordinators must approve any applicable federally funded PL before payment occurs.
- Purpose of the trip must be included on the expense report.
- Attendees are responsible for maintaining and providing upon request information related to registration and dues and fees to include agenda, sessions attended, and proof of attendance.

Transportation

Mileage must be documented on a "Travel Expense Statement". From the State Travel Regulations,

"Reimbursement for business use of a personally-owned vehicle is calculated per mile, from point of departure after deduction for normal commuting mileage, based on the current reimbursement rate."

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

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

Lodging

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

- Lodging must be documented on a "Travel Expense Statement".
- Employees are responsible for making their own reservations and guaranteeing them.

- Employees are responsible for submitting a copy of the tax exemption form for state and local hotel/motel excise taxes if staying at a hotel in Georgia. Any tax paid, must have an explanation of why it was not waived, for example, paid with personal credit card, state does not allow or \$5 State Hotel Motel Fee, no exemption allowed.
- Employees must travel more than 50 miles.
- Employees should use the least expensive rates for lodging. Any rates above this requires written authorization prior to the trip.
- Expenses must be broken down by date. Receipts are required.
- Any out-of-state travel must first receive the superintendent's approval.

Subsistence

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

- Meal reimbursement cannot exceed the following: Breakfast - \$6.00; Lunch - \$7.00; Dinner - \$15.00. Meals in Chatham, Cobb, DeKalb, Fulton, Glynn, and Richmond counties cannot exceed the following: Breakfast - \$7.00; Lunch - \$9.00; Dinner - \$20.00.
- Meal reimbursement for out of state overnight travel are generally eligible for per diem amounts designed to cover the cost of three (3) meals per day for all days on travel status other than the day of departure and the day of return. Travelers are eligible for 75 percent (75%) of the total per diem rate on the first and last day of travel.
- Expenses must be broken down on the expense report per meal.
- Taxes and tips are allowed and should be included in the total. However, this total should not exceed the per meal rate.

Expense Reimbursement

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

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

Segregation of Duties (CFR 200.303(a))

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

Assistant Superintendent for Business Services

Under the supervision of the Superintendent, the Assistant Superintendent for Business Services will carry out the following duties:

- Prepare monthly and annual financial statements for inspection by the Board of Education.
- Establish accounting procedures to ensure that proper internal controls are maintained for the district business office
- Manage cash flow and investment of available funds.
- Assist the Superintendent in preparation of financial data for the tax digest, state allotments, and other financial areas.

- Open all bank accounts and reviews prior to reconciliation. Approves reconciliations of other staff members.
- Oversee the reconciliation all accounts.
- Supervise operation of business office to include payables and payroll.
- Compile annual budget for board approval and submit to the Georgia Department of Education.
- Coordinate accounting procedures to ensure that central office and local school administrators follow proper procedures in the budgeting, record keeping, and expending of program funds for which they are responsible.
- Oversee, approve and post monthly and year-end adjustments, run and balance reports.
- Oversee and assist with the preparation and submission of year end and interim financial reports to the Georgia Department of Education.
- Manage funds for SPLOST, Capital Projects and Debt Service.
- Ensures a yearly audit is completed and submitted to the Department of Audits and Accounts.
- Compile data for audit, work with state auditors during audit, and prepare MD&A for audit report.
- Perform other duties as assigned by the Superintendent.

Accounting/Audit Coordinator

Under the supervision of the Assistant Superintendent for Business Services, the Accounting/Audit Coordinator will carry out the following duties:

- Assist in the implementation of accounting procedures by maintaining accurate records and internal controls throughout the system and ensuring compliance with all applicable regulatory requirements.
- Perform journal entries, budget adjustments, and bank reconciliations.
- Approves bank reconciliations that the Assistant Superintendent of Business services prepares.
- Assist in budget process and enters budget into the financial software.
- Close books at month and year end.
- Prepare and submit year end and interim financial reports to the Georgia Department of Education.
- Compile data for audit, work with state auditors during audit,
- Assist the Assistant Superintendent for Business Services with account analysis, report preparation and distribution, and month-end /year-end closeout procedures.
- Maintain a wide variety of financial records to ensure compliance and the availability of documentation.
- Perform payroll accruals and reversals.
- Oversees internal audits.
- Assist with any duties required for annual audit preparation.
- Perform other related duties as assigned by the Assistant Superintendent for Business Services

Accounting Specialist

Under the supervision of the Assistant Superintendent for Business Services, the Accounting Specialist will carry out the following duties:

- Request federal and state grant reimbursements.
- Submit annual completion reports on all federal and state grants.
- Process receipts.
- Record school lunchroom deposits.
- Enter journal entries into the financial software. (Does not post)
- Compile data for audit and work with state auditors during audit.
- Ensure drawdowns are based on actual expenditures and minimizing the time between the transfer of funds.
- Perform other related duties as assigned by the Assistant Superintendent for Business Services

Payroll Specialist

Under the supervision of the Assistant Superintendent for Business Services, the Payroll Clerk Specialist will carry out the following duties:

- Process monthly payroll and reporting for all system employees.
- Invoice for any payroll reimbursements.
- Prepare year-end reporting, including W-2's and 1099's.
- Calculate sick leave for retirement.
- Assist with budget preparation.
- Calculate salary adjustments
- Records Management
- Oversees verification of employment
- Prepare quarterly tax reporting.
- Compile data for audit, work with state auditors during audit,
- Perform other duties as assigned by the Assistant Superintendent for Business Services.

Accounts Payable and Purchasing Specialist

Under the supervision of the Assistant Superintendent for Business Services, the Accounts Payable and Purchasing Specialist will carry out the following duties:

- Balance travel reports monthly.
- Prepare invoices.
- Prepare year-end reporting, including 1099's.
- Assist with budget preparation.
- Pay invoices as they become due
- Enter vendors into the accounting software
- Oversee and consult on any liability insurance issues
- Compile data for audit, work with state auditors during audit,
- Perform other duties as assigned by the Assistant Superintendent for Business Services.

Administrative Assistant to the Superintendent for Business Services

Under the direction of the Assistant Superintendent for Business Services, the Administrative Assistant will carry out the following duties:

- Assist with internal audits.
- Assist with bank reconciliation of the primary bank account.
- Verify employment for outside agencies.
- Match invoices with checks for all bank accounts and keep a running check number listing
- Perform other duties as assigned by the Assistant Superintendent for Business Services.

Federal Programs/Title I Director

Under the direction of the Assistant Superintendent for Teaching and Learning, the Title I Director will carry out the following duties:

- Coordinate, monitor, and provide technical assistance to schools for Title I, Part A.
- Monitor all purchases to ensure that expenditures are allocable, reasonable, and necessary. Ensuring all system policies for purchasing, expending funds, and inventorying equipment are followed to avoid fraud, waste, abuse, and corruption. No items will be purchased without prior approval, and all items purchased must be a part of the approved budget.
- Approve each purchase requisition/order, travel expense statement and professional learning (PL) leave that is funded through Title IA. Meet with the Accounts Payable, Payroll Clerk, Accounting Specialist, and Accounting/Audit Coordinator as needed and request financial reports to ensure alignment and balance on at least a monthly basis. Meet with and/or email principals or designees to ensure accuracy of school budgets.
- Ensure system and school inventories are maintained electronically and kept up to date.

- Complete a physical inventory check at each facility each year. Purchase Orders are pulled from object codes 615, 616 to verify if each item is included in each school's and the central office's inventory.
- Ensure each employee is trained on his/her responsibility regarding fraud and the channels to report it if suspected annually.
- Coordinate with and supervise coordinators for each federal program with the exception of Special Education.

Title I Bookkeeper/Secretary

Under the direction of the Federal Programs Director, the Title I Bookkeeper/Secretary will carry out the following duties:

- Monitor each object code by encumbering the money from the PR, balancing each object code, and matching invoices to the posted encumbered monies.
- Maintains accurate records and internal controls (e.g. ledgers) ensuring compliance with all applicable regulatory requirements and accuracy of fund balances (object codes).
- Assists the Business Services Department with processing purchase requisitions, verifying available funds for accounts charged to system accounts, and payment of invoices.
- Reviews financial information for potential budget variances and ensures fund balances are accurate.
- Maintains a wide variety of financial records to ensure compliance and the availability of documentation.
- Reviews purchase requisitions, travel expense statements, and registration payments for compliance and accuracy.
- Assists with the Consolidated Application budgets.
- Assists with database activities related to the financial system (MUNIS).
- Assists auditors by providing supporting documentation and/or information on internal processes (including financial documents, professional learning documentation, equipment inventory, and all Title IA cross functional monitoring documents)

Title II Coordinator

Under the direction of the Director of Federal Programs, the Title II Coordinator will carry out the following duties:

- Responsible for coordinating, monitoring, and providing technical assistance to schools for Title II, Part A.
- Review and authorize all expenditures and if necessary, reconciliation of costs charged to Title II-A.
- Monitor all purchases to ensure that expenditures are allocable, reasonable, and necessary. Ensure all system policies for purchasing, expending funds, and inventorying equipment are followed to avoid fraud, waste, abuse, and corruption. No items will be purchased without prior approval, and all items purchased must be a part of the approved budget.
- Approve each purchase requisition/order, travel expense statement and professional learning (PL) leave that is funded through Title IIA. Meet with the Accounts Payable, Payroll Clerk, Accounting Specialist, and Accounting/Audit Coordinator as needed and request financial reports to ensure alignment and balance on at least a monthly basis to Monitor drawdowns to ensure they are based on actual expenditures.
- Assist auditors by providing supporting documentation and/or information on internal processes (including financial documents, professional learning documentation, equipment inventory, and all Title IIA cross functional monitoring documents).
- Final approval on all professional learning is completed by the Assistant Superintendent for Teaching and Learning who ensures that all activities are research-based.

Title III Coordinator; Homeless Liaison; Migrant Education Coordinator

Under the direction of the Director of Federal Programs, the following duties are performed:

- Ensures compliance with all applicable guidelines.
- Provides technical assistance
- Assists in the implementation of accounting procedures by maintaining accurate records and internal controls throughout the system and ensuring compliance with all applicable regulatory requirements.
- Assists the Business Services Department processing purchase requisitions verifying available funds for accounts charged to system accounts, and payment of invoices.
- Reviews financial information for potential budget variances and ensures fund balances are accurate.
- Maintains a wide variety of financial records to ensure compliance and the availability of documentation.
- Approves purchase requisitions, employee expense statements, and registration payments for compliance and accuracy.
- Assists with the development of grant proposals.
- Performs the needed administrative tasks for effective implementation of several federal and state sponsored programs and other grant management tasks as assigned.
- Assists with database activities related to the financial system.
- Assists auditors by providing supporting documentation and/or information on internal processes (including financial documents, professional learning documentation, and all Title III, Migrant, Immigrant, Homeless cross functional monitoring documents).
- Assists in maintenance of equipment inventory and ensures compliance to BOE disposal policy.

Director of Special Education

Under the supervision of the Assistant Superintendent for Teaching and Learning, the Director of Special Education will carry out the following duties related to IDEA, CEIS, and Special Needs Pre-k:

- Maintains accurate records and internal controls (e.g. ledgers) ensuring compliance with all applicable regulatory requirements and accuracy of fund balances (object codes).
- Reviews detail and summary reports for potential budget variances and ensures fund balances are accurate.
- Maintains a wide variety of financial records to ensure compliance and the availability of documentation.
- Approves purchase requisitions, travel expense statements, and registration payments for compliance and accuracy.
- Manages Consolidated Application budgets.
- Assists with database activities related to the financial system.
- Ensures the special education inventory is accurate.
- Assists auditors by providing supporting documentation and/or information on internal processes (including financial documents, professional learning documentation, equipment inventory, and all IDEA monitoring documents).

Special Education Assistant

Under the supervision of the Director of Special Education, the Special Education Assistant will carry out the following duties:

- Assists in the implementation of accounting procedures by maintaining accurate records and internal controls throughout the system and ensuring compliance with all applicable regulatory requirements.
- Assists the Business Services Department with processing purchase requisitions verifying available funds for accounts charged to system accounts, and payment of invoices.
- Reviews financial information for potential budget variances and ensures fund balances are accurate.

- Maintains a wide variety of financial records to ensure compliance and the availability of documentation.
- Reviews purchase requisitions, employee expense statements, and registration payments for compliance and accuracy.
- Assists with the development of grant proposals.
- Performs the needed administrative tasks for effective implementation of several federal and state sponsored programs and other grant management tasks as assigned.
- Assists with database activities related to the financial system.
- Assists auditors by providing supporting documentation and/or information on internal processes (including financial documents, professional learning documentation, and all IDEA cross functional monitoring documents).
- Participates in meetings, in-service training, workshops, etc.

CTAE Director

Under the supervision of the Assistant Superintendent for Teaching and Learning, the CTAE Director will carry out the following duties related to Carl Perkins grants. Working with the Assistant Superintendent for Teaching and Learning, the CTAE director:

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

Period of Performance Flexibility (2 CFR §200.77, 200.309, 200.403(g); 34 CFR §76.707)

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

- Purchases may extend beyond one year to take advantage of cost reductions, IF the students, teachers and school leaders in the current fiscal year receive benefit from the purchase.
- Leases and licenses – All instructional software subscriptions must be purchased prior to January.
- Professional Learning registration – To maximize cost efficiency, the LEA may take advantage of “early bird” professional development registration where early registration occurs in the original grant period and the actual professional development occurs in the carryover period.

Supporting documentation will be kept on file.

Every effort should be made to align all purchases to the original grant period as much as possible.

Grant Development and Budget Process

Each federal fund program coordinator prepares a yearly budget showing the distributions for district, per school and /or per program/function/object code. Federal program coordinators ensure that all funds budgeted are allowable per funding source. The budget is forwarded to Business Services after the GaDOE approves the budgets in the Consolidated Application. The Assistant Superintendent for Business Services and/or designee or the bookkeeper for federal programs enters the budget into the system financial software using the Consolidated Application budget as the source.

Supplement Not Supplant

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

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

The following three-prong test will be used for Title II and Title III in determining whether a fiscal expenditure supplements and not supplants. A positive response to any of the three prongs indicates that an expenditure would be supplanting.

- Test I - Required – is the program or activity that the district wants to fund required under state, local or another federal law?
- Test II - Equivalency – Were state and local funds used in the past to pay for this program or activity?
- Test III - Non-Title I Programs- Are the same programs or activities being implemented in other schools that do not receive Title I funds AND are these programs and activities being paid for with state or local funds?

Transferability

LEAs are provided the opportunity to transfer funds under the Every Student Succeeds Act. If the Barrow County School System exercises this flexibility, the system will follow all federal and state guidelines related to transferability.

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

The following internal controls have been created and designed to provide reasonable assurance regarding the achievement of objectives in the reliability of reporting for internal and external use.

Copies of completion reports for the previous fiscal year will be kept on file in the Business Services Department. Accounting records to support the results of outlays (expenditures indicated in the completion report will be kept on file in the Business Services Department). Copies of expenditure (cumulative through) reports for the respective quarter for total expenditures reported to GaDOE will be kept on file in the

Business Services Department. Federal program coordinators will examine budget summary and detailed expenditure reports for their respective budgets. School principals are required to analyze budget summary reports at least quarterly.

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

General ledger reports will be generated for each grant by function and object codes.

The Business Services Department completes these steps in the system financial software:

1. A business services representative will run an account activity summary report in the system financial software for all related expenses for the grant (July thru September of current year for grants ending on September 30th or previous July thru June for grants ending on June 30th).
2. A finance staff member will send the summary report to the Assistant Superintendent for Teaching and Learning and/or Program Director for sign-off.

Monitoring and Reporting Program Performance (CFR 200.328)

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

Steps to Audit/ Monitoring Resolutions:

- Once the audit/ Cross-Functional Monitoring report is received, the appropriate federal program coordinator will review all items. The Cross-Functional Monitoring report will be retrieved from the GaDOE website under the Consolidated Application.
- Each item will be examined carefully, and a team of system-level staff will determine the best means of corrective action.
- Items are gathered, and a report is written by the appropriate federal program coordinator.
- The report is submitted to the Superintendent.
- The completed report is then sent to the GaDOE state auditors as a means of resolution.
- The district has 30 days from the receipt of the findings to respond to the GaDOE.

Necessary, Reasonable and Allocable Costs (CFR 200.403-200.405)

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

Expenditure of federal funds must meet the clause of "allocable, reasonable, and necessary." When considering a purchase with federal funds, ask:

- (a) Is the cost of goods or services chargeable or assignable to the federal award in accordance with relative benefits received (allocable)?
- (b) Do I have the capacity to use what I am purchasing (reasonable)?
- (c) Did I pay a fair rate, and can I prove it (reasonable)?
- (d) Does this expenditure exceed that which would be incurred by a prudent person under the circumstances prevailing at the time the decision was made to incur the cost (reasonable)?

- (e) Is the proposed cost consistent with the underlying needs of the program (reasonable)?
- (f) Do I really need this (necessary)?
- (g) Do I need to spend these funds to meet the purposes and needs of the program (necessary)?
- (h) Is this expenditure related to an identified area of need in an improvement plan (necessary, allowable)?
- (i) Would I be comfortable defending this purchase (allocable, reasonable, and necessary)?

Capital Expense Funds (CFR 200.439)

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

Ethics and Fraud, Waste, Abuse, and Corruption

The Federal Programs Director reviews ethics and fraud, waste, abuse, and corruption policies as it relates to Title programs, including Title I, Part A (Disadvantaged Children), Title I, Part C (Migrant Education Program), Title I, Part D (Neglected and Delinquent), Title II, Part A (Teacher and Leader Quality), Title III (English Learners and Immigrant Students), Title IV, Part A (Student Support and Academic Enrichment), and Title X, Part C (McKinney-Vento Education for Homeless) with all administrators during fall meetings. An agenda and sign in sheet will be kept to document this has been completed. Principals will discuss the same information with their personnel. Artifacts such as meeting agendas and sign-in sheets verify the completion of this procedure. Principals are expected to inform their faculties about policies and updates as they are approved throughout the year. In addition, a presentation on ethics and fraud, waste, abuse, and corruption is emailed to all staff members at the beginning of each school year by the Director of Federal Programs.

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

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

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

Purpose: To ensure the reporting of suspicion of fraudulent activity, the Barrow County Schools provides employees, clients and providers with confidential channels for such reporting.

Definitions: Fraud: A false representation of a matter of fact, whether by words, by conduct, or by concealment of that which should have been disclosed, that is used for the purpose of misappropriating property and/or monetary funds.

Statement of Administrative Regulations: The Barrow County Schools thoroughly and expeditiously investigates and reported cases of suspected fraud to determine if disciplinary, financial recovery and/or criminal action should be taken.

Confidentiality: All reports of suspected fraud must be handled under the strictest confidentiality. Only those directly involved in the investigation should be provided information regarding the allegation. Informants may remain anonymous but should be encouraged to cooperate with investigators and should provide as much detail and evidence of alleged fraudulent acts as possible.

Procedures and Responsibilities:

1. Anyone suspecting fraudulent activity should report their concerns to the Barrow County School System Superintendent or Assistant Superintendent for Business Services at 770-867-4527.
2. Any employee with the Barrow County Schools (temporary staff, full-time staff and contractors) who receives a report of suspected fraudulent activity must report this information within the next business day.
3. Employees have the responsibility to report suspected fraud. All reports can be made in confidence.
4. The Barrow County Schools Board of Education shall conduct investigations of employees, providers, contractors, or vendors.
5. If necessary, the person reporting will be contacted for additional information.
6. Periodic communication through meetings should emphasize the responsibilities and channels to report suspected fraud.

(BCSS BOE Policy DIE)

The School System (“System”) shall not tolerate fraud of any kind and has an established system for the reporting of suspicious activities.

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

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

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

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

Complaint Procedures

Any complaints issued as a result of federal programming, including Title I, Part A (Disadvantaged Children), Title I, Part C (Migrant Education Program), Title I, Part D (Neglected and Delinquent), Title II, Part A (Teacher and Leader Quality), Title III (English Learners and Immigrant Students), Title IV, Part A (Student Support and Academic Enrichment), and Title X, Part C (McKinney-Vento Education for Homeless) must be filed according to the system complaint procedures policy. The school system will use the Tracking Form for Resolution of Complaints (Appendix B) to ensure that complaints are resolved in a timely manner. This form is maintained at the reception desk at the Professional Development Center. See 'Appendix A: Complaint Procedures'

Assessment Security

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

- The district test coordinator will stay current on appropriate testing rules and practice by viewing required DOE webinars and reading all manuals and memorandums associated with the test.
- All school test coordinators will be appropriately trained by the system coordinator within a two week period prior to the assessment window opening.
- School test coordinators will in turn provide mirrored training to all test examiners and proctors who will be taking part in the test.
- Records of participation and sign-in sheets of each of these meetings will be maintained in a centralized location for a minimum of five years.
- Trainings at every level will include a segment covering testing ethics and ethical behavior in testing environments.
- Test materials, when on site, will be continuously maintained in a secured and locked room with access limited to only those who are functioning as school test coordinators or assistant test coordinators.
- School campuses will be quiet and organized on the day(s) of testing.
- Any irregularity or anomalous event taking place in a school during testing will be promptly and fully reported to the district test coordinator.
- Irregularities involving possibly illegal or unethical actions on the part of an employee will be reported to the Georgia Professional Standards Commission.
- If the anomaly rises to the level of an irregularity it will be promptly reported to the Georgia Department of Education.
- When test results are returned they will be disseminated to students and parents in a reasonable time frame.
- Assessment results will be communicated to the public via press releases, sections of the website, and other means as necessary.
- Assessment practices and security measures will be communicated to the public via school newsletters in the month prior to the testing window.

Consequences for Violations Related to Assessment Security

Any employee who suspects a breach in assessment security must immediately report the breach to their immediate supervisor. Failure to report suspected breaches in assessment security can have negative implications upon an employee. In addition, any investigation that results in a determination of guilt related to

violations of assessment security can result in loss of employment and a report filed with the Georgia Professional Standards Commission, which may result in loss of a teacher's certificate.

Private Schools

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

For Title I, Part A purposes, eligible private school children are those who:

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

For IDEA, Title I, Part C, Title I, Part D, Title II, Part A, Title III, Title IV, Part A, and Title X, Part C purposes, eligible private school students are those who:

- Attend a private school within the district's geographic boundaries.

Eligibility and Consultation

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

To ensure meaningful consultation occurs, invitations for private schools to consult in the participation of federal programs the following calendar year are sent in the fall, usually October, via receipt delivery. The invitation includes a specific date and time for the initial consultation. The initial consultation is held to present information about the programs available to students in private schools. All Federal Program Coordinators participate in the meeting, which is complete with an agenda and sign in sheet. Upon receipt of the intent to participate form, which is provided to private school officials, a meeting is held to discuss plans and the required components of IDEA, Title I, Part A (Disadvantaged Children), Title I, Part C (Migrant Education Program), Title I, Part D (Neglected and Delinquent), Title II, Part A (Teacher and Leader Quality), Title III (English Learners and Immigrant Students), Title IV, Part A (Student Support and Academic Enrichment), and Title X, Part C (McKinney-Vento Education for Homeless) services for private schools in conjunction with the state Ombudsman. Follow-up consultation meetings are then scheduled with officials from participating private schools. After each consultation, public and private school officials sign a form indicating whether or not meaningful consultation occurred. Educational services and other benefits provided under this section for private school children, teachers, and other educational personnel shall be equitable in comparison to services and other benefits for public school children, teachers, and other educational personnel participating in the program and shall be provided in a timely manner.

Allocation

The amount of funds for equitable services to private school participants and their teachers and families, including carryover as appropriate, is provided by the Georgia Department of Education. The LEA will ensure that all guidelines related to reserved amounts for family engagement, administrative costs, and instructional/professional development services are followed.

Timeline

Month	Activity
September	<ul style="list-style-type: none">• Send letter to request participation to private schools who work with students from Barrow County Schools for the following school year.
October	<ul style="list-style-type: none">• Hold Private School Meeting consultation.• Upload Form B, Part 2 to GaDOE portal.
November	<ul style="list-style-type: none">• Gather data and consult with private school to determine services and possible participants.• Begin to gather data for Eligible Participation Worksheet.• Remind private school that any materials or purchases must be requisitioned and remains the property of Barrow County Schools.
August of following year	<ul style="list-style-type: none">• Verify addresses of students attending private school that wish to participate.• Begin services.• Note: If there is a third party vendor, see policy for third party vendor from GaDOE. Sign a letter that states the requirements on both parties to enter into agreement.
September-November January – May	<ul style="list-style-type: none">• Monitor all services regularly.• Conduct a mid-year consultation to review expenditure of funds and effectiveness of program.• Monitor all services regularly.• Plan for evaluation of services with a survey at the end of April.
July	<ul style="list-style-type: none">• Upload Form B, Part 1 to the GaDOE portal.

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

Family Engagement

Parent Involvement Policy Overview

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

the child's first teacher. As a conduit for their children's success, the district will assist parents of all socioeconomic levels in solidifying their ongoing commitment to their child's success.

Technical Assistance to Schools

LEA Technical Assistance to Schools on Parent Involvement Requirements and Best Practices

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

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

Parent Notifications

Communication in an Understandable Format

Upon enrolling their child(ren) in the Barrow County School System, every parent indicates their household's preferred communication language as a standard part of the registration process. To the extent practical, efforts are made to provide either written support or support through an interpreter when a parent indicates a language other than English. A district Language and Cultural Diversity Specialist supports these efforts, including recruiting and training staff and community members who are fluent in languages other than English. Language Line is also utilized for interpretation when a face-to-face interpreter is unavailable. The Language and Cultural Diversity Specialist also oversees the implementation of the district's [Translation and Interpretation Services Plan, which can be accessed via this link](#). Furthermore, all parent communication is written in a format so that the content is easily understandable.

School Designation Status

A school identified as needing Comprehensive or Targeted Support Interventions will receive the support of the LEA and/or School Improvement Division of the GaDOE as appropriate. Parents will be notified of each school's designation status using multiple means of communication.

English Learners Participating in Title I or Title III Supplemental Language Programs

No later than 30 calendar days after the beginning of the school year (or within the first two weeks of an EL being placed in a program), the Title I Department will notify parents of English Learners if their child is participating in a supplementary language program. The notification will be provided in a language parents can understand.

Parent Right to Know

In accordance with ESSA, all schools are required to notify parents at the beginning of each school year of their "Right to Know" the professional qualifications of their student's classroom teachers and paraprofessionals. In the spring of each year, the Superintendent or designee sends to the principals of every school/program a list of Required Notifications for Student Handbooks/Agendas. The first item on this list is the Parent's Right to Know Teacher's Training and Credentials. The notification uses the language of the law, and occurs within 30 calendar days from the start of school or upon enrollment.

School principals are responsible for providing a copy of the student-parent handbook containing the Parent's Right to Know to the Director of Planning and Personnel as evidence of parental notification of their Right to Know. If a school omits the notification from their student handbook, the Director of Planning and Personnel will notify the principal that he/she is required to notify each parent of their Right to Know via 1st class mail before the end of the first week of school. In this case, a copy of the notification letter will be

provided to the Director of Planning and Personnel. Responses to parent requests will be made within one week. The Parent Right to Know notification will also be posted on the District webpage.

20 Day Notification of Professional Qualifications

In accordance with ESSA all schools are required to provide timely notice to parents when students have been taught for four or more weeks by a teacher who does not meet applicable state certification or licensure requirements at the grade level and subject area in which the teacher has been assigned. Notification requirements apply to all teachers in all schools/programs. Notifications will be sent within ten business days following the four consecutive weeks. For verification purposes notifications must contain: day, month, and year of notification; the name of the teacher who has not met PQ, the name of the school and district; and a statement that the teacher has not met state certification or the district's charter waiver PQ requirements for the grade and subject in which the teacher is assigned. The notification will be sent in a format that ensures parents have the opportunity to receive the information. This may include: first class mail, parent link communication and/or email blast. To the extent practicable, the notification will be in a language the parent will understand. This applies to all teachers in all schools/programs.

Regular Education Teachers:

Notification must be sent when students have been taught for four or more consecutive weeks by a teacher who does not meet the district's PQ requirements at the grade level and subject area in which the teacher has been assigned.

Special Education Teachers:

Special Education teachers who do not issue grades: 20 day notifications must be disseminated if the teacher does not hold special education certification.

Special Education teachers who do issue grades: 20 day notifications must be disseminated if the teacher does not hold special education certification and content certification or equivalent as aligned with ESSA in-field.

Notifications are not required for paraprofessionals, substitutes, or lack of a clearance certificate.

Upon placement, the Principal will contact the Director of Planning and Personnel. The Director of Planning and Personnel will indicate the need to send a 20 day notification to parents and review the requirements. Prior to the 20 day mark, a draft letter will be sent to the Director of Planning and Personnel for review. The Director will approve the content and have the letter translated, if necessary. Within ten business days following the four consecutive weeks, the notification will be sent to parents. Evidence of dissemination will be kept on file in the Planning and Personnel office.

Parental Involvement Policies/Plans

Title I, Section 1118 of the Elementary and Secondary Education Act of 1965 (ESEA) 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 parental involvement policy.

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

The LEA, school, parents, and community stakeholders will jointly develop and agree on the Parental Involvement Policy/Plan which will describe the means for carrying out Title I, Part A requirements. The policy/plan will be made available to the local community and parents of students enrolled in the Barrow County School System using multiple means. The policy/plan will be available on the Title I page of the district's website (www.barrow.k12.ga.us), in the parent/student handbook, on individual schools' websites, in hard copy format in the main office of each school, and in various community locations.

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

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

Plans are shared with faculty, staff, students, parents, and community members on school websites and the district Federal Programs website located at: www.barrow.k12.ga.us. Plans include district and school improvement/schoolwide plans, parent involvement policies, school compacts, comprehensive LEA improvement plan, parents' right to know, complaint procedures, and policy on ethics and fraud, waste and abuse. Many of these plans are included in student agendas. An automated calling system and information in first day packets inform parents about the availability of these plans. Parental input into the content of each plan is solicited during multiple meetings throughout the school year but especially at Title I planning meetings conducted each Spring.

School/Parent Compacts

The Barrow County School System will share responsibilities for high student academic achievement with all parents and students enrolled in the school system and will develop, in collaboration with parents and students, a school-parent compact that outlines how parents, school staff, and students will share the

responsibility for improved student academic achievement. The school-parent-student compact will also describe the means by which the school, parents, and students will build and develop a partnership to ensure student mastery of the GaDOE's high academic content standards.

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

Annual Title I Meeting

All Title I schools are required to hold an annual meeting at the beginning of the school year. It is the responsibility of principals in coordination with the Family Engagement Specialist to arrange meeting times and invite all stakeholders to the meetings. The Family Engagement Specialist will be responsible for collecting and submitting documentation of the required Title I Annual Meeting, including copies of sign in sheets, agendas, and minutes to the Title I Director. Meetings are publicized via flyers sent to parents, web sites, newspaper articles, an automated call system, and marquees at each school.

Annual Evaluation of Parental Involvement

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

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

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

Parent involvement workshops and activities are planned for the following year based on information gained during the annual needs assessment process. Materials are also purchased for parent resource centers based on expressed needs. Many opportunities are provided for building strong parent capacity. The purpose is to ensure effective parental involvement and to support a partnership among schools, parents,

and the community to improve student academic achievement, through the following activities: annual meetings; conferences; e-mail communications; phone calls; parent workshops and activities; family nights; Volunteering; Parent advisory meetings; Open Houses; Annual notification of school designation; newsletters/flyers/brochures; website information; School Governance Team meetings; and Board of Education meetings.

Capacity for Parent Involvement

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

The Family Engagement Specialist considers and plans based on the six requirements for building capacity by answering the following questions:

1. What strategies/materials have been offered to parents on understanding academic content standards?
2. What training has been offered to parents related to literacy and the use of technology?
3. How have faculty and staff been encouraged to communicate with and involve parents in their child's education?
4. What efforts have been made to foster parental involvement in prekindergarten programs?
5. What attempts have been made to communicate parental involvement information to parents using language parents can understand?
6. What other support do parents receive for parental involvement activities?

All elementary schools within the Barrow County School System build parent capacity to impact student achievement through the implementation of Academic Parent Teacher Teams (APTT).

Parent Resource Centers

All schools have parent resource centers. A variety of materials and resources are available to parents for use at the school for checkout, or as handouts. Books, tapes, videos, DVDs, and a variety of other materials have been purchased for the parents. any purchases are based upon parent requests on the parent engagement surveys (i.e., helping with homework, information regarding bullying).

Schools are required to notify parents of the availability of the resources in the parent resource center. This is typically achieved through a flyer and/or websites and includes information on the types of resources available in or through the resource center.

Required 1% Set Aside for Parental Involvement

Principals have the option of expending the 1% in Parent Involvement funds or submitting them back to the system level. Principals, with input from parents, typically decide to direct those funds to a system level parent involvement activity/project by signing a District-wide Parent Activity Assurance form. The funds are used at the system level to fund a portion of the salary for a Family Engagement Specialist who serves all schools. 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.

School Improvement Plans

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

Schoolwide Program

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 with demonstrating proficiency on academic standards. A school is eligible to be a schoolwide program:

- If the local educational agency (LEA) determines that the school serves an eligible attendance area.
- If for the first year of the schoolwide program, the school serves a school attendance area in which not less than 40 percent of the students enrolled in the school are from low income families.
- If the school consults with stakeholders and makes 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 following components of the GaDOE Schoolwide Program Checklist:

1. Comprehensive Needs Assessment
2. Schoolwide Reform Strategies

3. Schoolwide Plan Development
4. ESSA Requirements for Schoolwide Plans

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.

All Title I schools within the Barrow County School System conduct Schoolwide Programs. This allows all children in these schools and their parents equal access to all related Title I assistance. Schoolwide Plans are updated and verified using a checklist during a school leadership meeting. 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 school's 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 who 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 required documentation (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 Involvement Plans, 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. 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 involvement, professional learning, and budgets. The district also conducts a workshop each June to provide schools with technical assistance on finalizing their plans.

Schoolwide Program Plan Development

School Improvement 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, parental involvement 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 plans. School administrators then present their school plans at the annual system leadership summit 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.

Consolidation of Funds

The Barrow County School System does not consolidate federal funds.

Targeted Assistance Programs

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. The Barrow County School System does not have a Targeted Assistance Program in any of its schools. All schools receiving Title I funds conduct Title I Schoolwide Programs.

Reservation of Funds

After receiving notification of the Title I, Part A grant amounts from GADOE, reservations in each budget are set aside for required components such as parent involvement, professional learning, neglected and delinquent, private school per pupil and equitable services, and homeless students. Administrative costs are also part of the reservations, which are not part of the schools' per pupil amounts. The remainder of Title I funds are allocated to schools based on per pupil allocation, as determined by the percentage of students qualifying for free and reduced price meals.

Parent Involvement

Required 1% Set Aside for Parental Involvement: Principals have the option of expending their 95% portion of the required 1% set aside in Parent Involvement funds or submitting them back to the system level. Principals, with input from parents, typically decide to direct those funds to a system level parent involvement activity/project by signing a District-wide Parent Activity Assurance form. The funds are used at the system level to fund a Family Engagement Specialist who serves all schools. 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.

Homeless Children and Youth

The Barrow County School System receives direct funding from the McKinney Vento Homeless Program. The system Homeless Liaison trains school personnel to identify children in homeless situations. A home survey is also used to identify homeless students. The system Homeless Liaison is consulted if any staff member suspects that a student qualifies for homeless services. The Homeless Liaison then investigates the situation and makes the ultimate determination on whether or not students qualify. When a student does qualify, the appropriate information is sent to the Information Technology Department to be entered into the Student Information System. McKinney Vento funds are used to purchase needed supplies and for tutoring services for identified homeless students on an as needed basis. Transportation is also provided to students on an as needed basis. Title I, Part A funds are also reserved to benefit the education of homeless students. Funds are allocated based on an annual analysis of student needs.

Neglected and Delinquent Children

The Barrow County School System does not currently have any centers that serve neglected and/or delinquent children. Therefore, no funds are reserved for these purposes. If centers for neglected and/or delinquent children locate in Barrow County in the future, funds will be served as directed by the GaDOE in the Title I, Part A allocation letter and worksheet. Additionally, if centers do locate in Barrow County in the future, an Annual Survey of Local Institutions for Neglected and Delinquent will be completed based on the number of children residing at the home for 30 consecutive days with at least one day being in October.

Private Schools

The Barrow County School System currently has no Private Schools that have chosen to participate in the Title I program. If the Barrow County School System ever has a Private School that chooses to participate, all Title I regulations for private school participation will be followed.

Rank Order

Schools are placed in rank order using the percentage of students that qualify for free and reduced priced meals according to grade span grouping.

Maintenance of Effort (MOE)

GADOE compares the fiscal effort of the preceding year to the second preceding fiscal year and makes the maintenance of effort determination available to the system through a marked “met” or “unmet” on the Consolidated Application. The calculation in the GaDOE portal determines which funds should be excluded from the calculation. Documentation for MOE is only required for districts that do not meet the required maintenance of effort. Title Program Coordinators will pull the MOE information from the Consolidated Application each school year for documentation purposes.

Comparability of Services

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

Carryover

Typically, carryover funds are allocated in one of two ways: (1) to schools by increasing the per pupil amount or (2) the funds are allocated back to all the schools on an equal basis, giving each school an opportunity to spend the funds. Either way, schools must submit a written description of the expenditure requests. Equitable services are also recalculated depending on an allocation of funds for district level activities.

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. The Title I Director tracks the spending of each program/school throughout the year via budget sheets. At the end of the school year, carryover information is updated and reviewed.

Title I, School Improvement (1003a) Grant

Monitoring and Oversight of School Improvement

All Title I schools within the Barrow County School System conduct Schoolwide Programs. This allows all children and all parents an opportunity to have equal access to all related Title I assistance. The LEA will utilize district members of the school system Teaching and Learning Department to build capacity and support the school improvement process in schools identified as needing comprehensive or targeted support interventions. All schools identified as needing comprehensive or targeted support interventions

within the LEA will be involved in school improvement efforts through the work of the LEA, RESA, and GaDOE. Members of the system Teaching & Learning Department will work with these schools to implement practices that have proven effective with improving schools. Members of the Teaching & Learning Department, along with the GaDOE, will establish clear expectations for personnel as they systematically support continuous improvement in all schools. However, more intensive support will be provided by LEA and GaDOE School Improvement Specialists in any schools within the Barrow County School System that are designated as needing comprehensive or targeted support interventions. The Title I Director will conduct a yearly evaluation of school improvement efforts for all Title I schools using the Barrow County School System Monitoring Form. Members of the Teaching and Learning Department will conduct progress checks to determine the extent to which school improvement plans have been implemented. These checks will occur quarterly.

Review and Approval of School Improvement/Schoolwide Plans

School Improvement Plans are updated each spring for the following school year. Each school leadership team updates the plans using representatives from each grade level, content area, and department, as well as district and school administration and parents. During school leadership meetings, instructional strategies, parental involvement initiatives, and professional development activities are planned after a careful analysis of various data. Assistance is provided to schools identified as needing comprehensive or targeted support interventions in the use of school improvement funds to accomplish initiatives in their school improvement and schoolwide plans. School administrators then present their school plans at the annual system leadership retreat as they work with other schools and system leaders to develop a system improvement plan. All school improvement plans must be signed off as completed by the system Title I Director and the Superintendent. The Professional Learning Plan for each school must have final approval by the Title II-A Coordinator. It is through this process that the LEA oversees the development of school improvement and schoolwide plans.

Professional Development, Analyzing Data, Technical Support and Assistance

System leaders in the Teaching & Learning Department support schools in developing, revising, implementing and coordinating school improvement and schoolwide plans during regularly scheduled meetings of administrators and instructional coaches. During the meetings, data is analyzed to identify and develop solutions to challenges related to instructional strategies, parent involvement, professional learning, and budgets. Each school, including those identified as needing comprehensive or targeted support interventions, must submit a school based plan for professional development to be reviewed and approved after recommendations by the Title I Director and other members of the Teaching and Learning Department. Plans are due each August and must generally be approved by the end of September.

Monitoring of Use of Funds

The Title I Director will meet with each school quarterly to review and provide recommendations for budgeting decisions.

Title I, School Improvement 1003(g) Grant

The Barrow County School System does not currently have any participating schools in this grant.

Intradistrict Transfer Option

The parent of a student enrolled in a public elementary or secondary school in Georgia may elect to enroll such student in a public school that is located within the school system in which the student resides other than the one to which the student has been assigned by the local board of education if such school has classroom space available after its assigned students have been enrolled. The school system shall be the final authority on determining if a school and/or grade level has available space to accept a transfer student. If a transfer is approved by the school system, the parent is responsible for the cost of transporting the student to and from school. Information related to how parents can exercise the transfer option and on which schools and/or grades have available space will be posted on the school district web site and using other means, including the district's automated calling system and system and school newsletters, prior to July 1 each year.

McKinney-Vento Program (MVP) Education of Homeless Children and Youth

Introduction

The Barrow County School System will follow the requirements of the McKinney-Vento Homeless Education Assistance Improvements Act of 2001 to ensure that all children and youth receive a free appropriate public education and are given meaningful opportunities to succeed in our schools.

Definitions

- *Children and youth experiencing homelessness* means children and youth who are otherwise legally entitled to or eligible for a free public education, including preschool, and lack a fixed, regular, and adequate nighttime residence, including children and youth who:
 - are sharing the housing of other persons due to loss of housing, economic hardship, or a similar reason;
 - are living in motels, hotels, camping grounds or trailer parks due to lack of alternative adequate accommodations;
 - are living in emergency or transitional shelters;
 - are abandoned in hospitals;
 - are awaiting foster care placement;
 - have a primary nighttime residence that is a private or public place not designed for or ordinarily used as a regular sleeping accommodation for human beings;
 - are living in a car, park, public space, abandoned building, substandard housing, bus or train station, or similar setting; and
 - are migratory and living in a situation described above.
- A child or youth shall be considered to be experiencing homelessness for as long as he or she is in a living situation described above and to the end of the school year in which the student moves into permanent housing.
- *Unaccompanied youth* means a youth not in the physical custody of a parent or guardian, who is experiencing homelessness as defined above. The more general term *youth* also includes unaccompanied youth.
- *School of origin* means the school the child or youth attended when permanently housed, or the school in which the child or youth was last enrolled.

- *Liaison* is the staff person designated by a Local Education Agency (LEA) as the person responsible for carrying out the duties assigned to the liaison by the McKinney-Vento Act.
- *Immediate* means without delay.

Identification

In collaboration with school personnel and community organizations, the liaison or designee will identify children and youth experiencing homelessness in the district, both in and out of school, and maintain access to data regarding homeless students. The liaison or designee will train school personnel on possible indicators of homelessness, sensitivity in identifying families and youth as experiencing homelessness, and procedures for forwarding information indicating homelessness to the liaison. The liaison will also instruct school registrars and secretaries to offer homeless education information upon the enrollment and withdrawal of every student, and to forward information indicating homelessness to the liaison.

School Selection

Each child and youth experiencing homelessness has the right to remain at his or her school of origin, or to attend the appropriate school that serves students who live in the attendance area in which the child or youth is actually living. Therefore, in selecting a school, children and youth experiencing homelessness shall remain at their schools of origin to the extent feasible, unless that is against the parent's or youth's wishes. Students may remain at their schools of origin the entire time they are experiencing homelessness, and until the end of any academic year in which they become permanently housed. The same applies if a child or youth loses his or her housing between academic years.

Enrollment

Consistent, uninterrupted education is vital for academic achievement. Due to the realities of homelessness and mobility, students experiencing homelessness may not have school enrollment documents readily available. Nonetheless, the school selected for enrollment must immediately enroll any child or youth experiencing homelessness. Enrollment may not be denied or delayed due to the lack of any document normally required for enrollment. Unaccompanied youth must also be immediately enrolled in school. They may either enroll themselves or be enrolled by a parent, non-parent caretaker, older sibling or the LEA liaison. If complete records are not available, IEP teams or other committees or school officials, as appropriate, must use good judgment in choosing the best course of action, balancing procedural requirements and the provision of services. In all cases, the goal will be to avoid any disruption in appropriate services.

Transportation

Transportation shall be provided to and from the school of origin for a child or youth experiencing homelessness. Transportation shall be provided for the entire time the child or youth has a right to attend that school, as defined above, including during pending disputes. Parents and unaccompanied youth must be informed of this right to transportation before they select a school for attendance. In addition to receiving transportation to and from the school of origin upon request, children and youth experiencing homelessness shall also be provided with other transportation services comparable to those offered to housed students. The Transportation Department holds annual training for all system drivers each fall on a number of topics. Training on the transportation of homeless students is an agenda item each year during this training. The Homeless Liaison uses a PowerPoint presentation to inform drivers on the how they can assist with the identification of homeless students, as well as other issues related to the

transportation of homeless students. Meeting documentation includes the PowerPoint presentation, agenda, and sign-in sheets.

Services

Children and youth experiencing homelessness shall be provided services comparable to services offered to other students in the school selected. School personnel must also inform parents of all educational and related opportunities available to their children and provide parents with meaningful opportunities to participate in their children's education. All parent information required by any provision of this policy must be provided in a form, manner, and language understandable to each parent.

Disputes

If a dispute arises over any issue covered in this policy, the child or youth experiencing homelessness shall be immediately admitted to the school in which enrollment is sought, pending final resolution of the dispute. The student shall also have the rights of a student experiencing homelessness to all appropriate educational services. The school where the dispute arises shall provide the parent or unaccompanied youth with a written explanation of its decision and the right to appeal and shall immediately refer the parent or youth to the liaison. The parent or unaccompanied youth shall be given every opportunity to participate meaningfully in the resolution of the dispute.

Credit for Full or Partial Coursework

Students experiencing homelessness will be provided credit recovery options so as not to cause the loss of partial or incomplete credits. The following methods will be used:

- After school credit recovery
- Awarding of half and full units of credit where appropriate through after school programs

Training of Personnel

The Homeless Liaison or designee annually conducts training and sensitivity/awareness activities to heighten the awareness of the following personnel of the specific needs of unaccompanied and homeless youth: principals, assistant principals, federal program administrators, transportation employees, registrars, school secretaries, school counselors, school social workers, custodians, school nurses and teachers. The liaison obtains from every school the name and contact information of a building liaison. Building liaisons will lead and coordinate their school's' compliance with this policy and will receive training from the district liaison annually. Meeting documentation includes the PowerPoint presentation, agenda, and sign-in sheets.

Coordination

The liaison shall coordinate with and seek support from the State Coordinator for the Education of Homeless Children and Youth, public and private service providers in the community, housing and placement agencies, the pupil transportation department, liaisons in neighboring districts and other organizations and agencies.

Preschool

Preschool education is a very important element of later academic success. Children experiencing homelessness have experienced many difficulties accessing preschool opportunities. Our system will ensure that children experiencing homelessness receive assistance in locating preschool programs. Children with disabilities who are experiencing homelessness will be referred for preschool services under the Individuals with Disabilities Education Act (IDEA). Children under age three with disabilities who are experiencing homelessness will be referred for at-risk services under Part C of IDEA and screened to determine if referrals for additional Part C services are appropriate. The liaison will collaborate with Head Start and Even Start programs and other preschool programs to ensure that children experiencing homelessness can access those programs.

Protocols

The following protocols associated with the McKinney-Vento Program shall be followed:

1. Student is identified as potentially eligible for MVP services and is in one of the following circumstances.
 - a. Student is a new enrollee.
 - b. Student is currently enrolled in a Barrow County School.
 - c. Student is residing in Barrow County but has a school of origin in another school system.
2. School system staff (school MVP liaison, school counselor, school social worker, Title I Family Engagement Specialist, registration staff or other school system personnel) gather information related to potential MVP eligibility and submit to district homeless liaison (DHL) for MVP status determination.
3. DHL determines MVP eligibility.
4. If the student is residing within the boundaries of Barrow County and seeks to attend a Barrow County public school, the DHL identifies the school placement of the student (school of origin for currently enrolled students or attendance zone school for new enrollees) and notifies applicable school staff including school nutrition director, school-based liaison, school administrator, ITS, school social worker.
5. If the student does not reside within the boundaries of Barrow County but seeks to remain in the school of origin in Barrow County the School Selection Feasibility Committee will convene to determine the school the student will attend.
6. If the School Selection Feasibility Committee determines the best placement to be the school of origin the DHL will notify the appropriate school personnel.
7. If the School Selection Feasibility Committee determines the best placement of the student to be in the attendance zone school then the committee will notify the school of origin and DHL of the placement decision. The school of origin will notify the parent guardian of the enrollment decision and appeal rights using the designated paperwork.
8. If the school that is selected denies the enrollment decision they must provide the parent with the written enrollment decision and appeal process paperwork.
 - a. A copy of this enrollment decision is forwarded to the DHL.
 - b. If parent disputes this decision then students stays in selected school.
9. If parent or guardian disputes the written enrollment decision then the first appeal will be made to the District Homeless Liaison.
10. The decision of the DHL will be presented to the parent/guardian in writing along with instructions on how to appeal this decision.
11. If the parent disputes the decision of the DHL then an appeal may be made to the Superintendent of Barrow County Schools. The Superintendent will inform the parent/guardian of his/her decision in writing along with a copy of the Georgia Appeals process.

12. As long as the parent appeals then the student may remain in the school originally selected.

Foster Care Transportation Plan

Planning

Real time coordination will occur between Case Managers, Education Support Monitor, Homeless Liaison, Foster Parents, and Court Appointed Special Advocates, regarding foster children entering and exiting care; changing placements; enrollment and withdrawal; and making best interest determinations. When transportation is an issue, those parties will collaborate to develop a transportation plan that meets the needs of the individual child. "No cost plans" will be explored first and may include the following:

1. Foster parent transports child to school of origin (within 25 miles round trip);
2. Foster parent transports child to nearest school transportation pick up location; or
3. LEA will follow existing plan for transporting children with disabilities when the foster child is disabled.

These steps will be followed if difficulty reaching an agreement on how to pay for transportation costs occurs:

1. As outlined previously, the LEA will assume financial responsibility for costs incurred as the result of the re-routing of school busses in Barrow County while DFCS will assume financial responsibility for costs associated with reimbursing foster parents for travel or the cost of contracting with local transportation companies.
2. Initial transportation planning will occur at the lowest level between parties named in Section A. Disputes will be forwarded to the LEA Federal Program Director and DFCS custody County Director for resolution.
3. Final determination of how to pay for additional transportation costs will be made by LEA Transportation Director.
4. Daily attendance will not be impacted by transportation disputes. LEA will provide or arrange for adequate and appropriate transportation to and from the child's school or origin during the resolution process.

The LEA Homeless Liaison will serve as the point of contact that coordinates with local DFCS. This individual will assume responsibility for streamlined communication and collaboration with DFCS Case Managers and Education Support Monitor (DFCS POC). Such collaboration will ensure the smooth implementation of provisions outlined in ESSA to include: thoughtful Best Interest Determinations; appropriate and timely transportation plans for those children placed out of the zone of their school of origin; and, immediate enrollment and records transfer. In addition, the LEA POC will facilitate training for LEA staff with regards to the unique challenges of children in foster care; ensure monitoring of attendance and progress of foster children enrolled in LEA; and, ensure effective and confidential data collection and sharing.

Transportation Plan

If transportation costs are unavoidable, LEA and DFCS will share costs. DFCS will assume responsibility for costs such as contracting with transportation companies or paying foster parents to transport farther than 25 miles. The LEA will assume responsibility for costs associated with re-routing LEA transportation within the boundaries of Barrow County. Options:

1. LEA will re-route transportation to pick child up at nearest bus stop or at foster home (as determined by Transportation Department) within Barrow County and transport directly to school of origin or to “Transportation Hub”;
2. LEA will re-route transportation to pick child up at agreed-upon point at county line in the event that child is placed in a neighboring county;
3. DFCS will arrange for payment to foster parent for transportation farther than 25 miles round trip; or
4. DFCS will utilize existing contracts with companies to provide transportation to school of origin or to agreed point at county line.

Title I, Part C - Migrant Education Program (MEP) Services

Identification and Recruitment

The Barrow County School System Migrant Education Program Specialist receives an email notification from the District’s online Registration Gateway whenever a parent or guardian indicates a positive response to questions related to moves into the District for occupational reasons and the nature of such employment. The MEP Specialist utilizes this information to help identify and recruit migrant students. The MEP Specialist also conducts in-District Identification and Recruitment activities to further identify potentially eligible families. The MEP Region 1 Recruiter visits the District MEP Specialist routinely and pulls data from the District’s Student Information System as an additional identification and recruitment tool. Contact is then made with each potentially eligible family to determine case-by-case eligibility and needs. Students who meet certain critical criteria are also identified with the assistance of the Ga DOE MEP as Priority for Services.

Services for MEP Students

Services to those students determined to be PFS are regularly tracked and submitted to the GaDOE MEP using the PFS Student Report. Migrant students are evaluated academically the same as other students in the system to determine academic needs. The MEP Specialist coordinates and tracks services to all MEP students utilizing the Supplemental Services Tracking Form. All migrant students are eligible for Title I services, and receive appropriate Title I services. In addition, a referral is made to student services to indicate that additional services may be needed from that department. Additionally, specific activities to address the needs of migratory families are provided. Such activities shall include informing children and families of, or helping such children and families gain access to other education, health, nutrition and social services.

Parental Involvement

A Migrant Education Parent Advisory Council (PAC) program is provided in conjunction with other District Parent Involvement Programs. Parent outreach is always provided in a language that is understood by the family. Parents are presented information on ESOL, Special Education, Gifted, and other educational programs. Information on health, nutrition and social services is presented using materials from the Migrant Education Department of the US and GaDOE.

Funding

The annual BCSS Comprehensive Needs Assessment Committee reviews academic and nonacademic data to determine the most appropriate use of Title I-Part C funds and this information leads directly to the development and submission for approval of the District MEP Implementation Plan(s) by the GaDOE MEP .

Evaluation

The MEP Specialist observes the actual delivery of the IPs and reports the results of that evaluation to the GaDOE MEP. Each Implementation Plan is evaluated in terms of effectiveness at its completion, and this evaluation is also submitted to the GaDOE MEP.

Services for Neglected and Delinquent Children

The purpose of Title I, Part D is to improve educational services for children and youth in local and State institutions for neglected or delinquent children and youth so that such children and youth have the opportunity to meet the same challenging State academic content standards and challenging State student academic achievement standards that all children in the State are expected to meet. The purpose is also to provide such children and youth with the services needed to make a successful transition from institutionalization to further schooling or employment and to prevent at-risk youth from dropping out of school, and to provide dropouts, and children and youth returning from correctional facilities or institutions for neglected or delinquent children and youth, with a support system to ensure their continued education. The Barrow County School System currently has no centers or agencies in its geographical boundaries that serve neglected or delinquent students.

Title II, Part A - Teacher and Leader Effectiveness

Purpose

Purpose: The purpose of Title II, Part A is to increase academic achievement by improving teacher and leader quality.

Equity Belief Statement

The Barrow County School System believes all students should have equitable access to quality instruction. The Barrow County School System strives to recruit, prepare, train and support high-quality teachers, paraprofessionals and leaders in our school system. We are also focused on developing school and district level improvement plans with measurable objectives that will ensure that all teachers are and remain highly effective.

Needs Assessment

Each Spring, the Barrow County School System begins the needs assessment process by surveying all leaders, teachers and paraprofessionals. Once survey results are tallied and summarized by school and system leaders, the results are shared with each school. Each school also receives a detailed presentation with agenda and minutes template to ensure consistency in the needs assessment process across the system. Each school then conducts a needs assessment meeting in which representatives from all stakeholder groups are invited (parents, teachers, paraprofessionals, administrators, community members, and other support staff). The needs assessment process at each school includes examining student achievement data, perception data from stakeholder surveys, professional learning plans, teacher recruitment and retention data, highly effective teacher and paraprofessional data, class size data, peer walkthrough data, TKES data, and verbal input from stakeholders.

Once the input is collected from the schools, a series of meetings are then held at the district level to consider all the prior stakeholder input and data and to make decisions regarding prioritized needs and equity concerns. Stakeholders participating in the needs assessment process at the district level include the Title II-A Coordinator, administrators, teachers, paraprofessionals, instructional coaches, counselors, parents, community members, District Directors, and higher education representatives.

The results of this needs assessment determine any areas of inequity and guide the development of plans and expenditure of funds.

Equity Plan

The previously described process is used to guide the development of the Equity Plan which is completed and posted by June of each year. Each equity indicator is rated and summary information provided. At least one equity indicator is selected for focus and an action plan is developed to address the area of focus. The Title II-A Coordinator monitors the implementation of the Equity Plan and area of focus, while collecting the documentation required to provide evidence of effective implementation. All source documentation is maintained in files, both hard copy and electronically, in the Federal Programs office.

Effectiveness Plan

The Title II-A funded activities in each major program component are analyzed and a plan is developed to assess the effectiveness of each activity. The plan is submitted in the ConAPP as a part of the budget requirements. For each activity, the following are addressed: The Title II-A component the activity addresses; a description of the activity; the data to be collected to determine effectiveness; the position of the person responsible for collecting the data and coordination the review and analysis of the data; and the timeline for collecting data and completing the review and analysis of the data. Careful attention is given to distinguishing between data/documentation that shows implementation versus data/documentation that shows effectiveness. The Effectiveness Plan is used throughout the year in monitoring program implementation and effectiveness and guides the needs assessment process for the following year. The Effectiveness Plan should be revised and uploaded if a budget amendment is submitted due to a change in needs and/or a significant change in budgeted strategies. All source documentation is maintained in files, both hard copy and electronically, in the Federal Programs office.

Professional Learning

Professional Learning in Barrow County is standards based, results-driven, and job-embedded. It is designed to improve student achievement by enhancing teacher content expertise and developing appropriate pedagogical skills. Professional Learning needs are assessed during the Comprehensive Needs Assessment process. Student achievement data, graduation data, and performance data are analyzed, and desired outcomes are stated. The Professional Learning Coordinator reviews the combined data to develop plans for professional learning that are both school and system based. Once plans are designed and approved by the Principals, School Governances Teams and Professional Learning Coordinator, the focus becomes the implementation of quality professional learning. Evaluations of professional learning training sessions and the analysis of the evaluations are ongoing. Adjustments in content and skills to be addressed are continuous. Assessing, applying, and sustaining content knowledge and skills that educators need to improve student learning are priorities.

Professional learning will focus on increasing the ability of the teaching staff and administration to help all students achieve high academic standards and eliminate the achievement gap that separates low-income and minority students from other students. The Barrow County School System will provide training to enable teachers, paraprofessionals and administrators to address the needs of students with different learning styles, particularly students with disabilities, students with special learning needs (including students who are gifted and talented), and students with limited English proficiency; improve student behavior in the classroom and identify early and appropriate interventions to help students; involve parents in their child's education; and understand and use data and assessments to improve classroom practice and student learning.

Professional Qualifications of Teachers and Paraprofessionals

The Barrow County School System seeks to hire qualified teachers, paraprofessionals and administrators. Vacancies are posted on the webpage for Barrow County Schools. A job description is included as well as job requirements. This ensures that the applicants have met the minimum qualifications to meet the required professional qualifications. Qualified applicants are then eligible to interview with principals. Principals make recommendations to the Planning and Personnel Department, and recommended candidates are fingerprinted and complete other paperwork.

Parents are informed of their rights to know the qualifications of their children's teacher. In the spring of each year, the Superintendent or designee sends to the principals of every school a list of Required Notifications for Student Handbooks/Agendas. Within this list is the Parent's Right to Know Teacher's Training and Credentials. School principals are responsible for providing a copy of the student-parent handbook containing the Parent's Right to Know to the Director of Planning and Personnel as evidence of parental notification of their Right to Know. If a school omits the notification from their student handbook, the Director of Planning and Personnel will notify the principal that he/she is required to notify each parent of their Right to Know via 1st class mail before the end of the first week of school. In this case, a copy of the notification letter will be provided to the Director of Planning and Personnel.

If a student has been assigned to or has been taught for four or more consecutive weeks by a teacher who does not meet professional qualifications, parents will be provided a timely notice. 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.
 - For paraprofessionals who are not highly qualified.

Any Barrow County School System teacher or paraprofessional who does not meet the district's professional qualifications or who holds a non-renewable certificate will have an individualized remediation plan to meet the professional qualifications or gain a clear renewable certificate. The remediation plan will be developed collaboratively with the teacher, principal, and the Director of Planning and Personnel at the time of hire or when non-PQ status or non-renewable certificate is determined. All remediation plans are monitored quarterly.

In order to maintain qualified teachers and paraprofessionals, a Principal training is held each spring. All principals and district staff are trained on the requirements to meet professional qualifications and the placement of teachers and paraprofessionals.

Parents' Right to Know

At the start of school, every school principal must notify parents of their right to request the professional qualifications of their child's teachers and paraprofessionals using the District's template. This should be sent home in the student handbook and posted to the District webpage. A sample of the handbook acknowledgement form should be forwarded to the Director of Planning and Personnel. Students enrolling after the beginning of school receive a letter of their rights upon enrollment. Receipt of the letter is recorded by a parent/ guardian signature.

Title III and English to Speakers of Other Languages (ESOL)

Purpose

The purpose of the state-funded ESOL program is to assist students to develop proficiency in the English language, including listening, speaking, reading, and writing, sufficient to perform effectively at the currently assigned grade level. The purpose of the federally-funded Title III supplemental program is to ensure that English learners (ELs) and immigrant students develop English proficiency and meet the same academic content and academic achievement standards that other children are expected to meet.

Student Assessment, Identification, and Enrollment Procedures

Parents/guardians of all students enrolling in Barrow County School System are surveyed via a Home Language Survey (HLS) to determine the student's first-learned, primary, and home language(s). For students with a language reported on the HLS other than or in addition to English, eligibility for ESOL services is determined using the Kindergarten WIDA ACCESS Placement Test (K-WAPT), WIDA Screener, or transfer records demonstrating current eligibility for language assistance services. ELs are assessed annually on the appropriate state-adopted English proficiency measure (ACCESS for ELLs 2.0, Kindergarten ACCESS for ELLs, or Alternate ACCESS) to determine continued eligibility or readiness to exit language assistance services.

The district notifies parents/guardians annually of their child's eligibility for ESOL. Such notification is made within the first thirty days of school for students continuing in the ESOL program and within two weeks of the date of eligibility determination for newly identified students. Parents/guardians have the right to decline ESOL services, as outlined in the annual notification. Upon their request, the ESOL teacher will contact the parents/guardians to ensure a clear understanding of the services offered and the educational implications of declining participation in the ESOL program. If the parents/guardians affirm their desire for their child be removed from the ESOL program, the school will provide a waiver form. Upon receipt of a signed parent waiver, the student will be removed from the ESOL program. The school must provide language assistance services through alternate means as outlined in the district procedures for Indirect Services. The student remains eligible for classroom and testing accommodations and must participate in the state-mandated annual English proficiency assessment until meeting exit criteria. Parents/guardians continue to be notified annually of their child's eligibility until such time that the student meets exit criteria, and a new waiver must be collected annually. At any time, the parents/guardians may request reinstatement of ESOL services for their child.

ADD TITLE I NOTIFICATION REQUIREMENTS HERE

Exit Guidelines [EDIT](#)

According to GaDOE guidelines, a kindergarten student must score an Accountability Composite Proficiency Level (CPL) of 5.0 or higher with no individual domain score less than 5.0 in order to exit the ESOL program. Students in grades 1-12 who score a CPL of 4.7 or higher are considered English proficient and are exited from language assistance services.

Title III law requires that districts monitor students for four calendar years following exit from language assistance services. If an exited student transfers to the district during the four-year period following attainment of previous district's English proficiency criteria, the school will monitor the student for the remainder of the monitoring period. The school must maintain documented evidence that the student was actively monitored throughout the first two years of the monitoring period. ESOL teachers will monitor student grades, attendance, and discipline to ensure students are progressing and performing well academically. ESOL teachers further collaborate with regular education teachers when the data indicates students may be struggling in one or more areas. If needed, additional academic supports may be implemented through RTI. If a reasonable period of intervention and monitoring is unsuccessful and the student's difficulties appear to be related to English proficiency rather than academic deficits or disability, the RTI team may recommend a Language Assessment Conference (LAC) to consider the student's redesignation to EL status with direct ESOL services. The district reviews and responds to the disaggregated data for students in the third and fourth years of the monitoring period.

Funding

The Barrow County School System receives direct funding for the Title III and ESOL programs to purchase instructional materials, provide professional learning, conduct parent outreach, and to hire the necessary personnel to ensure that the needs of English Learners (ELs) are met. Needs which cannot be met through the resources and funding available through local, state, and other federal funding sources are directed to the Title III & English Learner Support Coordinator. Title III funds are utilized to meet these needs when appropriate and allowable.

Professional Learning

Every teacher of EL students, counselors, and administrators must participate annually in ongoing professional learning relevant to ELs. The results of the annual comprehensive needs assessment guide the district ESOL professional learning plan. ESOL teachers communicate students' current English Language Proficiency (ELP) scores to staff members and assist their colleagues with identifying appropriate scaffolding techniques and instructional strategies based on these scores.

Parent Outreach

The district carries out an annual Title III event for families of EL students to inform parents of ways to assist their students academically, including understanding English Language Proficiency (ELP) scores as well as other assessments in which their children participate and their implications. School programs, resources, and activities are also shared with parents in these meetings, and parents are provided an opportunity to provide feedback and input. Each school also plans and carries out additional Title III family outreach events throughout the school year to further assist parents. Rosetta Stone and/or Mango accounts are made available to parents of ELs who have a need and desire to improve their English proficiency in order to increase their capacity to help their children succeed in school.

The district's Translation and Interpretation Services Plan guides district staff in supporting parents in need of these services. Upon registration, the district asks parents to indicate their preferred language for oral and written communications. To the extent practicable, communications are provided in the parent's preferred language. Resources available to assist with translations and interpretation include Language Line, a phone-based interpretation service with over 180 language options; a district translator/interpreter (Spanish); a district-maintained list of approved interpreters and translators (trained and vetted according to procedures established in the Translation and Interpretation Services Plan); and wireless interpretation equipment for use in large meetings (includes interpreters' transmitters and parent headsets).

Program Evaluation and Accountability

The success of the ESOL instructional program and Title III supplemental programs and initiatives will be measured by analyzing the results of English Language Proficiency (ELP) assessments, academic assessments, and other available measures. As a result of this analysis, programmatic and instructional adjustments are implemented as appropriate. A biennial Title III program evaluation will be conducted and a report of findings completed. The report will describe the progress EL students have made in language

acquisition and meeting specified annual content goals for EL subgroups, including ELs, monitored students, former ELs, and ELs with disabilities.

Title IV, Part A Student Support and Academic Enrichment

Purpose

Title IV, Part A, Student Support and Academic Enrichment (SSAE) grants are intended to improve students' academic achievement by increasing the capacity of States, LEAs, schools, and local communities to:

- provide all students with access to a well-rounded education,
- improve school conditions for student learning, and
- improve the use of technology in order to improve the academic achievement and digital literacy of all students. (ESEA section 4101).

Use of Funds

The school system makes a determination of how funds will be spent following a needs assessment process in which a variety of stakeholders participate. Needs are then prioritized and funded dependent upon the availability of funds.

Individuals with Disabilities Act

IDEA procedures, including those for SST, Child Find, Evaluation/Re-evaluation, Eligibility, and Discipline, can be found in the Barrow County School System's Special Education Department Handbook.

Appendix A: Complaint Procedures

A. Grounds for a Complaint

Any individual, organization, or agency (“complainant”) may file a complaint with the Barrow County School System if that individual, organization, or agency believes and alleges that BCSS is violating a federal statute or regulation that applies to a program under the Title I, Part A of the Elementary and Secondary Education Act of 1965 (ESEA). The complaint must allege a violation that occurred not more than one (1) year prior to the date the complaint is received, unless a longer period is reasonable because the violation is considered systemic or ongoing.

B. Federal Programs for Which Complaints Can Be Filed

- Title I, Part A: Disadvantaged Children, Academic Achievement Awards, Schoolwide Programs
- Title I, Part C: Migrant Education Program
- Title II, Part A: Teacher and Leader Effectiveness
- Title III, Part A: English to Speakers of Other Languages
- Title X, Part C: The McKinney-Vento Homeless Act

C. Complaints Originating at the Local Level

As part of its Assurances within the ESEA program grant applications and pursuant to Section 9306 within the Title I, Part A of the Elementary and Secondary Education Act of 1965 (ESEA), an LEA accepting federal funds must have local written procedures for the receipt and resolution of complaints alleging violations of law in the administration of covered programs. Therefore a complaint should not be filed with the Georgia Department of Education until every effort has been made to resolve through local written complaint procedures. If the complainant has tried to file a complaint with the Barrow County School System to no avail, the complainant must provide the Georgia Department of Education written proof of their attempt to migrant the issue with the Barrow County School System.

D. Filing a Complaint

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

- A statement that the Barrow County School System has violated a requirement of a Federal statute or regulation that applies to an applicable program.
- The date on which the violation occurred.
- The facts on which the statement is based and the specific requirement allegedly violated (include citation to the Federal statute or regulation).
- A list of the names and telephone numbers of individuals who can provide additional information.
- Whether a complaint has been filed with any other government agency, and if so, which agency.
- Copies of all applicable documents supporting the complainant’s position.
- The address of the complainant.

The complaint must be addressed to: David Beeland, Federal Programs Director, Barrow County School System, 179 W. Athens Street, Winder, GA 30680.

Once the complaint is received by the BCSS, it will be copied and forwarded to the Federal Programs Director.

E. Investigation of Complaint

Within ten (10) days of receipt of the complaint, the Barrow County School System will issue a Letter of Acknowledgement to the complainant that contains the following information:

- The date the Barrow County School System received the complaint.
- How the complainant may provide additional information.
- A statement of the ways in which the Barrow County School System may investigate or address the complaint.
- Any other pertinent information.

If additional information or an investigation is necessary, BCSS will have sixty (60) days from receipt of the information to complete the investigation and issue a Letter of Findings. If the Letter of Findings indicates that a violation has been found, a timeline for corrective action will be included. The sixty (60) day timeline may be extended if exceptional circumstances occur. The Letter of Findings will be sent directly to the complainant, as well as the other parties involved.

F. Right of Appeal

If an individual, organization, or agency is aggrieved by the final decision of the Barrow County School System, that individual, organization, or agency has the right to request review of the decision by the Georgia Department of Education. For complaints filed pursuant to Section 9503 (20 U.S.C. 7883, complaint process for participation of private school children), a complainant may appeal to the Georgia Department of Education no later than thirty (30) days from the date on which the complainant receives the Letter of Findings. The appeal must be accompanied by a copy of the Barrow County School System’s decision and include a complete statement of the reasons supporting the appeal.

Appendix B: Tracking Form for Resolution of Complaints

Barrow County School System Federal Program Tracking Form for Resolution of Complaints

Date Complaint Received	Person Receiving Complaint	Person Filing Complaint	Person To Whom Complaint Assigned	Complaint	Resolution	Date Resolved