



IMPLEMENTING TITLE I

In The Barrow County School System

FY15 Title Programs Handbook For School Administrators

**Dr. Chris McMichael, Superintendent
Dr. David Beeland, Jr., Title I Director**

Purpose of Title I and This Handbook

Title I, Part A is a multi-faceted federal entitlement program designed to “help all children have the opportunity to obtain a high-quality education and reach proficiency on challenging state and academic standards and assessments.” The purpose of Title I is to “enable schools to provide opportunities for at-risk and disadvantaged children to acquire the knowledge and skills contained in the challenging State content standards and to meet the challenging State performance standards developed for all children.” Title I is intended to serve students in core academic subject areas: Reading/Language Arts/English, Math, and Science and Social Studies. Title I is NOT for Foreign languages, Art, Music, Health and PE, Gifted and Talented, or any area other than the core subjects.

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

The information contained in this handbook will promote uniformity in operations as Title staff seeks to carry out official Title duties and responsibilities. The Georgia Department of Education (GaDOE) provides Local Educational Agencies (LEAs) extensive guidance on the over-arching requirements for Title I via the on-site monitoring document that is used to ensure that LEAs are meeting all statutory requirements of Title programs. These specific requirements from the GaDOE document were used to create this handbook. It is hoped that this handbook will be useful in assisting faculty and staff to comply with all federal programs statutory requirements.

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Calendar

DATE	EVENT/TASK
June 30, 2014	FINAL Versions of FY15 Title I Schoolwide Plans, Parent Involvement Plans, Compacts Due
July 2014	FLP Plan Parent Input Meeting
July 1, 2014	Deadline to notify Intradistrict Transfer (Mail if Priority or Focus School)
July 31, 2014	CLIP/FLP Submittal Deadline
August 22, 2014	Proposed Title I Spending Plans Due in Google Docs
August 29, 2014	Provide Schedules of Title I School Personnel (Identifying Split-Funded, as Applicable) to Penny Sheppard
August – October 2014	Provide Professional Learning to Staff RE: Title I Requirements & Building Capacity of Parents
August – October 2014	Annual Title I Parent Informational Meeting School Level (Not to be combined with any other meeting)
September 2, 2014	Time Logs for Split-Funded Title I and II Staff Due to Penny Sheppard
October 2014	Onsite Technical Assistance Provided by District's Title I Staff
October 1, 2014	Time Logs for Split-Funded Title I Staff Due to Penny Sheppard (30-40% of Funds Expended)
October 2, 2014	Submit Documentation from Annual Title I Parent Informational Meeting (Notices, Agendas, Sign-in Sheets, Minutes, etc)
November 3, 2014	Time Logs for Split-Funded Title I Staff Due to Penny Sheppard
November 4, 2014	Submit Documentation from Staff Meeting RE: Title I Requirements & Building Capacity of Parents
December 1, 2014	Time Logs for Split-Funded Title I Staff Due to Penny Sheppard Inventory Review by District Staff (Month of December)
January 5, 2015	Time Logs for Split-Funded Title I Staff Due to Penny Sheppard (40-75% Funds Expended); 2 nd FLP Letter
January 9, 2015	Submit 1 st Semi-Annual Periodic Certifications for 100% Title I-Funded Personnel to Penny Sheppard
February 2, 2015	Time Logs for Split-Funded Title I Staff Due to Penny Sheppard
March 2015	Onsite Technical Assistance Provided by District's Title I Staff
March 2015	Conduct Federal Programs Stakeholders' Needs Assessment Meeting
March 2, 2015	Time Logs for Split-Funded Title I Staff Due to Penny Sheppard
March – April 2015	Title I Annual Parents Planning Meeting FY16 Planning (May be held on same date as Stakeholders' Meeting, but no later than 4/30/15)
April 1, 2015	Time Logs for Split-Funded Title I Staff Due to Penny Sheppard
May 1, 2015	Time Logs for Split-Funded Title I Staff Due to Penny Sheppard
May 5, 2015	Submit Documentation from Title I Annual Parents Planning Meeting
May 5, 2015	Submit 1 st Draft of Completed FY16 Parent Involvement Plans and School-Parent Compacts
June 1, 2015	Submit 2 nd Semi-Annual Periodic Certifications to Penny Sheppard
June 1, 2015	Time Logs for Split-Funded Title I Staff Due to Penny Sheppard
June 18-19, 2015	13 th Annual Title Programs Conference (Principals should consider attending)

Monitoring Process & Procedures

Title I mandates that the content and performance standards for Title I students reflect the same expectations generally held for all children. School reform is encouraged to support school wide projects. Title I programs are monitored by the state to determine the effectiveness of the entire program as well as individual student progress. It is mandated that instruction be individualized, therefore, diagnostic information must be obtained to plan each student's program.

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

- (a) LEA/Program Director will conduct self-monitoring of its schools and programs sufficient to ensure compliance with Title Program 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 and English to Speakers of Other Languages (ESOL), and Title X, Part C (McKinney-Vento Education for Homeless).
- (b) Title I Director will undergo training from GaDOE and other sources to maintain proficiency in Title I program compliance requirements.
- (c) Title I Director will provide technical assistance to local schools.
- (d) Title I Director self-monitoring will include monitoring all program expenditures to verify that all program expenditures comply with Title I Program requirements.
- (e) Title I Director will maintain all documentation LEA may need for future auditing/monitoring according to the LEA Monitoring Form, which is issued annually by GaDOE.
- (f) In years when LEA does not receive an on-site visit, Title I Director will complete the Self-Assessment Checklist and submit it to the Georgia Department of Education (GaDOE).
- (g) LEA will undergo monitoring by GaDOE on a four-year cycle. LEA/Program Director will participate in training and technical assistance updates as provided by GaDOE prior to monitoring visit.
- (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 Title programs. If a Corrective Action Plan is required, the LEA/Program Director will respond in a timely manner with a Corrective Action Plan, which must be approved by GaDOE. The appropriate Title Program Education Specialist will monitor implementation of the Corrective Action Plan.

Monitoring is an essential component of ensuring that all facets of the Title I program are being implemented as prescribed by No Child Left Behind under the Elementary and Secondary Act. It is a process of systematically providing technical assistance and collecting data in order to provide information that can guide program implementation.

The Barrow County School System Title I Program makes use of monitoring as a means of regular observation and recording of activities taking place in Title I 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 Title I 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:

1. Monitoring of Expenditures – Local educational agencies (LEAs) must submit for approval an annual budget through the Consolidated Application process. Title I Education Program Specialists review each application and budget to ensure that expenditures are appropriate for the program area before approving LEA budgets. Once budgets are approved, Title I Education Program Specialists track how well LEAs are requesting funds for expenditures to ensure that LEAs are likely to meet the expenditure requirements for Title I funds.
2. Single Audit – LEAs with single audit findings are flagged for technical assistance.
3. On-site Monitoring – An SEA on-site Cross-Functional Monitoring Team visits a LEA to apply the criteria included in the *LEA Monitoring Form*.
4. 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).

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

- Selection of LEAs to be monitored.
- LEAs are 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 Title I Schools and Programs

Monitoring of Title I schools is a critical component of ensuring that compliance is taking place at each school. During the first two months of school, the district Title I Director convenes a meeting of all Title I principals. Principals receive training on policies and procedures and guidance for operating Title I programs, including Title I, Part A (Disadvantaged Children), Title I, Part C (Migrant Education Program), Title I, Part D (Neglected and Delinquent), Title II, Part A (Teacher and Leader Quality), Title III and English to Speakers of Other Languages (ESOL), 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 Title I. Information is provided to principals related to timelines, budget forms, inventory information, schoolwide implementation, Flexible Learning Plans (FLPs), parental involvement, fraud policy and other areas of Title I as appropriate. Quarterly Principal meetings are also held with Title I principals. Specific budget information is given out at these meetings. Phone calls and emails are a daily occurrence between Title I district staff and Title I school staff.

In addition to meeting with principals, the Title I Director meets with the Title I Family Engagement Specialist at the beginning of each year. These meetings are an opportunity to discuss Title I in detail and also an opportunity to discuss content specific information with each of the above. All Title I services are supplemental. This process is monitored through on-going technical assistance, site visits, and through the budgeting process.

Process for Feedback and Working With Schools

All Title I schools are subjected to on-going monitoring by the Title I Director throughout the school year. The Title I Director will conduct on-site monitoring of all schools at least once per school year to ensure compliance with Title I guidelines. Feedback will be provided to principals using the Barrow County School System Title I LEA Monitoring of Schools Form (see Appendix A) and Impact Review Feedback Form. In addition, emails, staff meetings, and phone conversations take place throughout the year as a means of providing on-going monitoring and communication with each Title I school.

Identification of High Risk Schools

Any school with one or more ratings of "Does Not Meet" on the Barrow County School System Title I 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.

Timeline for Monitoring of Title Programs

- August-September. Provide a technical assistance session for all Title I schools following the GaDOE Title I Conference in June to update principals on any new guidelines and to provide guidance for “new” Title I principals. Sessions will include the following topics: budgets, ordering, compliance, parental involvement, 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 and English to Speakers of Other Languages (ESOL), and Title X, Part C (McKinney-Vento Education for Homeless).
- July-August- Using CCRPI information determine the schools that will need to offer FLP services and work with principals to create and mail required letters.
- August-September- Work with principals on annual revision of school improvement plans and budgets. The Title I Director, Family Engagement Specialist, and Title II Coordinator will review plans and budgets to ensure that funds are being spent according to plans and that plans have all the necessary components.
- August – June – Minimum of quarterly meetings with Principals. Additional training as needed.
- August-December - Inventory all items purchased by Title I. Monitor schools, provide feedback.
- August – June – Migrant and Homeless Programs are monitored by the Title I Director.
- On-going review of school improvement data and plans in conjunction with members of the Teaching & Learning Department
- December – conduct on site monitoring visits.
- January/February – Title I Director and members of the Teaching and Learning Department conduct Impact Checks to ensure school improvement plans and budgets are being implemented with fidelity.
- February/March - Title I Director attends GCEL conference
- On-going - Budgets and purchase orders are reviewed monthly by Title I Office personnel to assist schools in spending funds as planned.
- February/March – Conduct annual comprehensive needs assessment. Data is provided to Title I schools so each can compile data to determine needs for the following year.
- On-going – The Title I Director provides technical assistance and meets regularly with principals.

Cycle for Monitoring Title I Schools

All Title I schools in the Barrow County School System 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 Title I school is monitored to ensure that accurate records are maintained for all equipment purchased with Title funds. The yearly monitoring includes an assessment of the following Title I programs: Title I, Part A (Disadvantaged Students), Title I, Part C (Migrant Education Program), Title II, Part A (Teacher and Leader Quality), Title III and English to Speakers of Other Languages (ESOL), and Title X, Part C (McKinney-Vento Education for Homeless).

Data Review

Data is compiled, reviewed, and discussed during monthly administrative and curriculum 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 Title I schools have data rooms and/ or notebooks that are used during the data analysis process. School leaders discuss this information with all staff to ensure they fully understand the data presented.

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

Corrective action from a previous monitoring is discussed with principals in order to assist them in understanding the critical need for compliance in Title I. Professional learning is provided based on needs. In addition, professional learning is used as a preventive measure to ensure that all Title personnel have a clear understanding of all expectations for every facet of the Title I program. The Title I Director, along with district level staff, and outside consultants, provide on-going training as a means of ensuring that all Title I staff are in compliance at all times. Upon completion of onsite visits, Title I staff

documents areas in need of completion and/or correction and provides detailed findings reports to school principals clearly articulating required corrective action with due dates.

Technical Assistance

Technical Assistance is offered at all times through e-mail 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 principal's 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 principal's 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. The Title I Director maintains a file of all training conducted throughout the year. Ongoing monitoring after training is conducted by the Title I Director to ensure compliance.

Comprehensive LEA Improvement Plan (CLIP) Procedures for Review and Approval

Section 1112 of the Title I, Part A of the Elementary and Secondary Education Act of 1965 (ESEA) specifies that local educational agencies (LEAs) may receive funds under ESEA if the LEA has an approved plan on file with the Georgia Department of Education (GaDOE). [Source: GaDOE's Title I Handbook for Title I Directors, 11th Edition].

Guidance to Schools/Departments

There are three major components of the CLIP: ESEA/IDEA Plan Descriptors, System Profile, and LEA Implementation Plan. All components of the CLIP are required prior to the district receiving funding from state and federal programs. CLIP revisions take place annually using prior year data and needs assessment information. 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, school and system leaders, as well as community and parent stakeholders are involved in the revision process. Title I parents are sent information inviting them to participate via mail, email, telephone, newspaper, social media, flyers, website, and newsletters. The district conducts an annual survey each year that allows parents to provide input on district policies and procedures. Parent input is examined and considered from these surveys. Documentation includes sign-in sheets, agendas, meeting minutes, emails, survey responses and returned plans with comments. Copies of comments are kept on file and put in meeting minutes. 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. The Title I Director gathers all input and updates the Consolidated Action Plan. 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, 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). All parents of Barrow County School System's students are provided multiple opportunities to be involved in the development and revision of the Barrow County School System's CLIP. These opportunities include access to the CLIP and a feedback survey on the district's web page, at a districtwide parent meeting held in the Fall, and at spring school based Title I planning meetings. Once the CLIP has been completed in the GaDOE portal, all district directors, including the following programs: Title I, Part A (Disadvantaged Children), Title I, Part C (Migrant Education Program), Title I, Part D (Neglected and Delinquent), Title II, Part A (Teacher and Leader Quality), Title III and English to Speakers of Other Languages (ESOL), Special Education (IDEA) and Title X, Part C (McKinney-Vento Education for Homeless), are provided the opportunity to review and make any final changes before the CLIP is submitted for approval by the GaDOE by the Title I Director.

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 survey 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.
- September-October – The current CLIP is made available during a district parent meeting and during school Title I Annual Meetings.
- 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 Comprehensive Annual Needs Assessment.
- May-June – Changes are made to the CLIP based on feedback obtained from multiple means and stakeholders.
- July – A system wide parent meeting is held for final input into the CLIP.
- July 31 – The CLIP is uploaded for GaDOE approval.

Resolution for Unapproved Plans

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

Pre-Kindergarten Programs

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

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

Parent Involvement

Parent Involvement Policy Overview

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

LEA Technical Assistance to Schools on Parent 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 once per school year at each school.
- One on one meetings held at each school site between the Title I Director and/or Family Engagement Specialists and school leaders.
- The creation and sharing of a Title I Handbook.
- Technical assistance with planning, organizing, and conducting parent meetings.
- Ongoing emails and phone calls.

Parent Notifications

Communication in an Understandable Format

When parents mark on the online enrollment form that they need correspondence in another language, to the extent practical, efforts are made to provide either written support or support through an interpreter. A district Family Engagement Specialist supports these efforts as well as school staff who are fluent in multiple languages. Language Line is also utilized for interpretation. Furthermore, all parent communication is written in a format so that the content is easily understandable.

School Designation Status - Priority Schools

The Barrow County School System does not have any schools designated as Priority Schools at this time. In the future, if a school does receive this designation, the following procedures will be followed.

A school identified as a Priority School will receive the support of the School Improvement Division of the GaDOE. This support will be through the assignment of a School Improvement Specialist who will work with the school on a regular basis and will bring in other staff to support identified areas for growth. The LEA will sign a three year Memorandum of Agreement with the GaDOE on behalf of Priority Schools. The Memorandum of Agreement will outline a set of non-negotiable actions and interventions required of each Priority School aligned with the turnaround principles. The MOA will be developed during the Spring of the year before it is to be signed in the Fall.

Using the U.S. Department of Education's (US ED) definition and methodology for identification, schools identified as Priority Schools will receive school improvement support and intervention for a period of three years. Schools will be exited from Priority School status when the school no longer meets the definition of a Priority School for three consecutive years and has reduced the number of non-proficient students by 25 percent over a period of three years. High schools identified as Priority Schools based on graduation rate must increase their graduation rate by 8% over a period of three years.

School Designation Status - Focus Schools

The Barrow County School System currently had one school (Winder-Barrow High School) identified as a Focus School. However, the district received notice from the GaDOE on December 17, 2014, that Winder-Barrow High School had met the exit criteria to be removed from the list of Focus Schools. Therefore, the school system currently has no schools identified as Focus Schools. In the future, if a school does receive this designation, the following procedures will be followed.

The GaDOE will work in collaboration with the LEA to analyze student achievement data to identify the largest gaps between groups of students. Based on the analysis of data, the LEA and the GaDOE will determine the interventions required of each Focus School. LEAs sign a Memorandum of Agreement with the GaDOE on behalf of Focus Schools. The MOA will outline a set of non-negotiable actions and interventions required of each Focus School.

Using the U.S. Department of Education's (US ED) definition and methodology for identification, schools identified as Focus Schools will receive school improvement support and intervention for a period of three years. Schools will be exited from Focus School status when the school no longer meets the definition of a Focus School for three consecutive years and demonstrates that the individual subgroup or subgroups that caused the school to be identified as a Focus School has decreased the number of non-proficient students by 25% over a period of three years. High schools identified as Focus Schools due to subgroup graduation rates must achieve a graduation rate that falls at or above the State subgroup graduation rate average for three consecutive years or show an 8% graduation rate improvement over a period of three years.

Flexible Learning Programs

All Title I Priority and Focus Schools must offer a Flexible Learning Program (FLP). In addition, all Title I Priority and Focus Schools must develop a written plan that outlines how the schools will implement an FLP. The FLP plan must be approved by GaDOE's Title Programs Unit prior to implementation. All Title I Priority Schools and Focus Schools are required to send notices to parents describing the school's status, sharing data and information used to support programming decisions, and explaining how parents

may become involved in improving the school. All Title I Priority Schools are required to set-aside 10% of their school's Title I allocation for professional learning. Focus Schools are not required to set-aside 10% of their school's Title I allocation for professional learning. However, Focus Schools may set-aside funds for professional learning if the need for professional learning is addressed in the school's Title I targeted assistance or schoolwide plan. LEAs are required to set-aside a minimum of 5% of the LEA's Title I allocation to implement the LEA's FLP in its Title I Priority and Focus Schools. Set-asides above the minimum 5 percent requirement may come from the LEA's total allocation or the Priority Schools and Focus Schools' allocation and are subject to the equitable services to eligible private school students' requirements (ESEA Section 9401(c)(5)).

Teacher and Paraprofessional Qualifications and Parent Right to Know

Parents are informed of their rights to know the qualifications of their children's teacher. This information will be sent home to every parent at the beginning of the year in each student's agenda. The notice will include the specific contact person and telephone number and email address for information. This information is also made available through district and school websites, parent information notebooks visibly available in the main office of each school and other newsletters sent home with students, as well as during each school's Title I Annual Meeting.

Highly Qualified Teachers Evidence

If a student has been assigned to or has been taught for four or more consecutive weeks by a teacher of a core academic subject who is not highly qualified, parents 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.

Principals are required to mail a letter to the parents of those students who are taught four or more weeks by a teacher who does not meet highly qualified status. The information above will be available for review by parents and members of the community on the system and school web sites, as well as in a visible location in a notebook in the main office of each school. It will also be contained in the agenda that each student receives at the beginning of each school year.

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. All children in Barrow County School System participate in Title I programs.

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 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.

Parental Input on District and School Parent Involvement Plans

District and school parent involvement plans are reviewed and revised annually with parents and other stakeholders (teachers, principals, administrators, and other school personnel). Schools will hold individual meetings for review of the district and school Parent 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.

Distribution of Completed Plans

Several plans are shared with faculty, staff, students, parents and community members on the school district Federal Programs web site located at: www.barrow.k12.ga.us.

Plans include district and school improvement plans, parent involvement policies, Title I schoolwide plans, school compacts, flexible learning program plans, comprehensive LEA improvement plan, parents' right to know, complaint procedures, and policy on ethics and fraud, waste and abuse. Many of these plans are included in student agendas. 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 of students 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.

Parental Input on School Compacts

All Title I schools are required to have school-parent compacts. It is the responsibility of the Principal, in coordination with the school system 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 Schools 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

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

Process to Review: The results of the surveys are shared among several groups of stakeholders, including, but not limited to, parents, school and central office employees, and community members. School Governance Teams and those attending Annual Title I Meetings. The results of the surveys 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 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 Parent Engagement department, 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?

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. Many purchases are based upon parent requests on the parent involvement 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

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

School Improvement (1003a) Grant

Monitoring and Oversight of School Improvement

All 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 Priority and Focus schools. All Priority and Focus schools within the LEA will be involved in school improvement efforts through the work of the LEA, the RESA, and GaDOE. Members of the system Teaching & Learning Department will work with Priority and Focus 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 systemically 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 a Priority, Focus, or Alert school. 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. This form includes a section for monitoring the School Improvement grant and the Flexible Learning Program. In addition, members of the Teaching and Learning Department will conduct impact checks to determine the extent to which school improvement plans have been implemented. These checks will occur in January/February each school year.

Review and Approval of School Improvement and Schoolwide Plans

School Improvement and Schoolwide 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 Priority and Focus schools in their use of school improvement funds to accomplish initiatives in their school improvement and schoolwide plans. School administrators then present their school plans at the annual system leadership retreat as they work with other schools 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 Focus and Priority Schools, 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.

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 automated calling system and system and school newsletters, prior to July 1 each year.

Georgia's ESEA Flexibility Waiver and Flexible Learning Program (FLP)

Georgia's LEAs with schools identified with a Priority or Focus designation are required to offer a Flexible Learning Program (FLP). Flexible Learning Programs (FLP) will initially be funded through a minimum five (5) percent set-aside requirement for any Title I Priority or Focus school. Additional Title I, Part A funds may be set-aside to ensure that a viable FLP program is implemented with fidelity.

Enrollment

While students in Priority Schools and Focus Schools are eligible to receive FLP services based on low-income status and their individual student scores on state assessments, LEAs must prioritize Title I FLP funding and services to the students in Priority Schools and Focus Schools base on the following federal rank order:

- Rank Order I: Students in the following subgroups who are not meeting standards as identified by state assessment results: students with disabilities, English Learners, or free- and reduced price lunch; and, if funding levels allows:
- Rank Order II: All other students who are not meeting standards, as identified by state assessment results; and, if funding levels allow;
- Rank Order III: Students who are meeting standards, as identified by state assessment results.

The Barrow County School System will mail a letter to parents of students who attend a Priority or Focus school, informing them of the existence of a Flexible Learning Program. All students who attend a Priority or Focus school in the Barrow County School System will participate in the Flexible Learning Program using a during the day delivery model.

Notification to Parents of Workshop and Eligibility For Services

All parents will be encouraged to participate in the development of a Flexible Learning Program for any schools designated as Priority or Focus Schools. Parents will be invited using multiple means of communication including radio advertisements, newspaper articles, flyers sent home with students, automated phone calls, and web site announcements. In addition, notification will be sent via U.S. mail to parents informing them of their child's eligibility to participate.

Description of Services

For each Title I Priority or Focus school, the LEA must submit an FLP plan that addresses the following:

- Using school level disaggregated data, what are the areas of weakness (content area(s), subgroup(s), and graduation rate(s) if applicable) that will be addressed by the FLP offered at this school?
- How will the LEA implement an FLP plan that will ensure supplemental academic instructional time that is designed to support the students meeting identified goals and outcomes?
- How will the LEA provide professional learning (PL) for the FLP staff/contractor so instruction is engaging, enriching and tailored to meeting the needs of the students and is not a regurgitation of the teaching methods utilized with the students during regular instructional time?
- How will the LEA ensure that the instructional goals of the FLP students are aligned with

Common Core Georgia Performance Standards?

- How will the LEA maximize the enrollment of the students in FLP?
- How will the LEA maximize the attendance of participating students in the FLP?
- How will the LEA monitor the implementation of the program and the tracking of all the required data?

Submission of the FLP Plan

As part of the Consolidated Application, the school system will submit:

- A list of Title I schools that are required to offer a Flexible Learning Program (FLP), their classification as to Priority or Focus by school and LEA, and the school's Title I status.
- An LEA will project how much the LEA is intending to budget on their Flexible Learning Program (FLP) in the following areas:
 - Administrative Personnel Costs
 - Supplemental Materials / Supplies - LEA office and / or School
 - Evaluation Costs
 - Transportation Costs of FLP Program
 - Instructor Costs – Current Teachers or Contract Instructors
 - Professional Learning Costs
 - Equitable Services for Eligible Private School Students, where applicable
 - Total Cost of the Public School Choice transportation (parent reimbursement and / or school buses), if applicable
 - Required set-asides
 - Other (as approved by the LEAs GaDOE Flexible Learning Program Specialist)

Budgets

Title I Part A is a federally funded program under the Elementary and Secondary Education Act of 1965 (ESEA). This Act provides federal funds through the Georgia Department of Education (GaDOE) to local education agencies (LEAs) and public schools with high percentages of poor children to help ensure that all children meet challenging State academic content and student academic achievement standards.

- LEA's must submit, through the Consolidated Application, the Title I, Part A Flexible Learning Program (FLP) budget as a part of the LEA's Title I, Part A budget. The descriptions of all budgeted items must be specific and clearly describe the intent of the expenditure.
- All items budgeted must meet the allocable, allowable, reasonable, and necessary tests described in the OMB Circulars.
- Are the expenditures allowable Title I expenditures?
 - Do the expenditures appear to be necessary in light of the LEAs goals and objectives?
 - Are the costs of the expenditures reasonable:
 - Are the expenditures for core subject areas?

Prior to review of any budget submitted for approval, the Title I Education Program Specialist reviews the plans for the LEA's FLP submitted through the Consolidated Application Tab for FLPs. The FLP Plan contains ten questions which the LEA must respond to detailing the LEAs program for those LEAs with Priority and Focus Title I schools that are required to set-aside a minimum of five (5) percent of their Title I, Part A allocation for flexible learning academic interventions and supports.

Required Set Aside

Flexible Learning Programs (FLP) are initially funded through a minimum 5% set-aside requirement for all Priority and Focus schools. The 5% set-aside must be a LEA set-aside. LEAs have the option of setting aside monies to provide additional interventions for the LEA's Title I Alert schools or Alert Schools have the option of using a portion of their Title I allocation in order to implement interventions based on their Alert School status; however, Alert Schools are not required to do so. LEAs may set-aside additional funds above the required 5% set aside to implement interventions (i.e., FLP) in its Priority, Focus, and Alert Schools. This set-aside would be a custom set-aside in a LEA's Consolidated Application that would clearly explain the intervention and list the Priority, Focus, and Alert schools to which it applies.

This set-aside would not be subject to the requirement to provide equitable services to eligible private school children, their teachers, and their families because public Title I school students, as a whole, do not benefit from those services either.

Timeline

August – Develop list of eligible students based on multiple selection criteria and federal tier guidelines.

September – Mail letters home informing parents of the FLP..

October – Begin serving students using a Flexible Learning Program.

January – Mail a second letter informing parents of the FLP.

April – Conclude program and complete evaluation.

Monitoring and Evaluation

The LEA must submit the following components of an evaluation plan within its FLP plan in the Consolidated Application for *each* Priority and Focus School Served:

- Effectiveness target or overall quantified goal of the program
- Assessment instrument(s) used to measure this target / goal
- Timeline for assessments (rough timelines for administration of pre-test, post-test, etc.)
- LEAs must submit their evaluation plan as a part of their FLP plan.

The Title I Director and the GaDOE will monitor program data and evaluate performance according to the overall goal as stated in Title I, Part A legislation – increasing academic achievement on state assessments and attaining proficiency in meeting state standards. The evaluation will qualify core program components in an effort to highlight factors that contribute to effectiveness.

Each FLP will be evaluated on the following dimensions:

- Participant Feedback
 - Evaluation Question: What was the overall experience of stakeholders with the program?
 - Data Source: Stakeholder surveys
- Service Delivery
 - Evaluation Question: Is the LEA and its FLP program in compliance with laws and regulations?
 - Data Sources: Annual monitoring data, program documentation, federal reporting, public reporting, technical Assistance, etc.
- Effectiveness
 - Evaluation Question: Are programs contributing to increased student academic achievement and performance on state education standards?
 - Data Sources: Student performance on state tests, pre-post assessment measures of state standards and academic skills targeting by programs, performance flag data, and student growth in schools offering FLP.
 - Evaluation results will be shared with stakeholders and the public and used to inform ongoing program improvement.

The Title I Director will communicate regularly with the FLP Coordinator and Principal at each Priority and Focus school to identify and solve challenges in a timely manner.

Transportation

The Flexible Learning Program will be provided during the day. Therefore, transportation will not be required.

Professional Learning

Professional learning will be provided to staff delivering the FLP to ensure appropriate instructional strategies are implemented to ensure the success of the students being served. Documents to be maintained: sign-in sheets, agendas, and description of professional learning.

Schoolwide Program/Plans

Overview

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

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

Schoolwide Title I programs must:

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

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

Components of a Schoolwide Program

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

1. Use such program's resources to help participating children meet the state's challenging student academic achievement standards expected for all children.
2. Use effective methods and instructional strategies that are based on scientifically based research directly tied to the comprehensive needs assessment and academic standards that strengthens the core academic program of that school and that:
 - a. Provide opportunities for all children in the school to meet or exceed Georgia's proficient and advanced levels of student performance.
 - b. Are based upon effective means of raising student achievement.
 - c. Use effective instructional methods that increase the quality and amount of learning time.
 - d. Address the needs of all children, particularly targeted populations, and address how the school will determine if such needs have been met and are consistent with improvement plans.
3. Provide instruction by highly qualified teachers.
4. Professional development for the staff to enable all children in the school to meet performance standards.
5. Strategies to increase parental involvement.
6. Plans for assisting preschool children in the transition from early childhood programs to local elementary school programs.
7. Measures to include teachers in the decisions regarding the use of assessments to provide information on, and to improve, the performance of individual students and the overall instructional program.
8. Coordination and integration of federal, state, and local services and programs.
9. Activities to ensure that students who experience difficulty mastering standards shall be provided with effective, timely assistance, which shall include:
 - a. List state and local educational agency programs and other federal programs that will be

- included.
 - b. Description of how resources from Title I and other sources will be used.
 - c. Plan developed in coordination with other programs, including those under the School-to-Work Opportunities Act of 1994, the Carl D. Perkins Vocational and Applied Technology Act, and National and Community Service Act of 1990.
10. Activities to ensure that students who experience difficulty mastering standards shall be provided with effective, timely assistance, which shall include:
 - a. Measures to ensure that a student's difficulties are identified on a timely basis.
 - b. Periodic training for teachers in the identification of difficulties and appropriate assistance for identified difficulties.
 - c. Teacher-parent conferences that detail what the school will do to help the student, what the parents can do to help the student and additional assistance available to the student at the school or in the community.
 11. Description of how individual student assessment results and interpretation will be provided to parents.
 12. Provisions for the collection and disaggregation of data on the achievement and assessment results of students.
 13. Provisions to ensure that disaggregated assessment results for each category are valid and reliable.
 14. Provisions for public reporting of disaggregated data.
 15. Plan developed during a one year period, unless the LEA, after considering the recommendation of its technical assistance providers, determines that less time is needed to develop and implement the schoolwide program.
 16. Plan developed with the involvement of the community to be served and individuals who will carry out the plan including teachers, principals, other school staff, pupil service personnel, parents and students (if secondary).
 17. Plan available to the LEA, parents, and public.
 18. Plan translated to the extent feasible, into any language that a significant percentage of the parents of participating students in the school speak as their primary language. Plan is subject to the school improvement provisions of Section 1116.

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

LEA Guidance

On-site meetings are held with principals to discuss the current status of their plans in regard to checklist components. Missing or items in need of revision are marked on the checklist and then rechecked when

the revised plan is submitted. Copies of agendas and sign-in sheets from such meetings will be collected and stored in a Title I notebook as evidence and documentation of meetings. As previously stated, system leaders support schools in developing, revising, implementing and coordinating school improvement and schoolwide plans during regularly scheduled administrative and Instructional Coach meetings. During the meetings, data is analyzed to identify and develop solutions to challenges related to instructional strategies, parent involvement, professional learning, and budgets.

Schoolwide Program Plan Development

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

Plan Consolidation

The Barrow County School System does not consolidate Schoolwide and 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 conduct Title I Schoolwide Programs.

Fiduciary Responsibility

Maintenance of Effort

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. The Title I Director 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.

Supplement vs. Supplant

Title I expenditures are supplemental to schools’ budgets. Personnel are in addition to the number required to meet maximum class size as determined by GaDOE. Title I funds are only used to supplement and, to the extent practical, increase the level of funds that would, in the absence of Title I funds, be made available from non-federal sources for the education of students participating in Title I programs.

Title I funds must not be used to take the place of (supplant) local, state, or other federal funding and are not provided to participating Title I children when the same services are provided to non-Title I children with non-federal funds. Conversations regarding supplement vs. supplant are held quite often throughout the year. The programs/activities provide supplemental services to programs that are required by federal, state, and local law. Title I funds do not support programs that were previously paid with state or local funds unless there has been evidence of precipitous decline. The Board of Education must approve any precipitous decline documentation. All Title I principals are made aware of the supplement not supplant issue during the training that takes each Fall. Principals review all requests from Title I staff for all budgetary requests. The Title I Director reviews budget requests to ensure that supplanting is not taking place.

Title I uses the follow questions to ensure that programs are supplementing, not supplanting:

The response to the following questions must be NO:

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

Title funds are not to be used to provide services that would, in the absence of Title dollars, be supported with state or local resources. To test yourself, ask:

- (a) Does federal, state, or local law require this program?
- (b) Did the school provide the program with non-Title I funds in prior years?

If the answer to either of these questions is "YES" then Title funds cannot be used. Title I funds in a Schoolwide Program are expected to demonstrate that they are *over and above* the amount provided to all schools in the district. The Barrow County School System Title I Director will train all parties in Supplement versus Supplant annually as part of the budgeting process.

An LEA may rebut a supplanting determination if it can demonstrate it would not have provided services had the federal funds not been available. An LEA should maintain documentation including (but not limited to):

- Fiscal or programmatic documentation to confirm that, in the absence of Title I, Part A funds, the LEA would have eliminated services in question.
- State or local legislative action.
- Budget histories.

Reasonable and Necessary Use of Funds

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

- (a) Do I really need this?
- (b) Do I need to spend these funds to meet the purposes and needs of the program?
- (c) Do I have the capacity to use what I am purchasing?
- (d) Did I pay a fair rate and can I prove it?
- (e) Would I be comfortable defending this purchase?
- (f) Is the proposed cost consistent with the underlying needs of the program?

Allowable and Unallowable Costs

Any purchases made with Title funds must follow the guidelines for allowable costs. Barrow County School System Title Programs will follow guidelines as detailed in EDGAR, OMB Circulars (such as A-87), and the Title I Handbook for Georgia. Title I purchases will also adhere to any memos, letters, and/or communication regarding allowable/unallowable purchases. The Title I Director will direct any questionable expense to the Area Program Specialist for further clarification.

Title 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. Title funds can only be expended for those events that “build capacity.” This means you can fund a snack for a *workshop teaching parents a specific skill*, but could not give snacks to parents volunteering.

Internal Controls

Authorization of Expenditures and Segregation of Duties

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

1. Each budget, after prepared at the school level, is reviewed by Title I Director, revised by school personnel, if necessary, and approved by the Title I Director. Once a school makes the necessary changes and the budget is submitted and approved by the state, each school or department completes purchase order in the school system financial software.
2. Purchase order must include:
 - Complete vendor information including phone number (and fax number if applicable)
 - Ship to information including the address for the school
 - Principal or designee assigns the appropriate account number based on the budget sheets
 - Principal may submit the purchase order after he/she verifies the materials being requested are part of the SWP and SIP.
3. The requisition is then sent to the Title I Office using financial software for review by the Title I Director.
4. The Title I Director reviews the requisition to assure that the purchase is included in the Schoolwide/School Improvement Plan and that the expense is allocable, reasonable, and necessary.
5. If approved, the Title I Director then signs off on the requisition and forwards the requisition to the Finance Office using the financial software program.
6. If rejected, a reason is entered into the Rejection Statement field that is then visible at the school level.
7. A Purchase Order Clerk obtains final approval from the Finance Director using the financial software and orders the merchandise.
8. When the merchandise arrives, the school or department notifies Accounts Payable that payment for the items received is authorized.

Semi Annual Periodic Certifications

Semi Annual Periodic certifications for all Title I paid staff takes place after-the-fact. The process takes place twice yearly. The first certification takes place on the last work day in December and the second periodic certification takes place at the end of the school year on the last day of school (May). The forms are signed and kept on file in the Title I office.

Personnel Activity Reports

Split-funded personnel paid with Title I funds are required to maintain monthly time logs in Google Drive. The logs are shared among the employee, supervising principal, and the Title I Director. The logs are printed monthly, signed by the employee and sent to the Professional Development Center. At the PDC, the Title I Director signs and files the logs.

Consultants, Contracts, Purchased Services for Title I 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 Title I Director
- Specific duties are specifically spelled out for each contract.
- The person must also submit to be fingerprinted if they are working with students.
- The contract includes the number of hours to work and the rate of pay.
- Principals must submit the tutoring time logs based on the payroll deadlines from the Payroll Department.

Each contract is signed by the following: Contractor, Principal, and Title I Director. The Title I Director provides oversight in ensuring that all contractors’ work is complete. Artifacts, daily sign in sheets, and

completion of all workshops are kept on file in the Title I office. The Title I Director signs off on all invoices/contracts prior to the issuance of payment for services. These contracts must be maintained and kept in the Title I files.

Equipment and Real Property

Title I inventory is maintained on a spreadsheet by each school that identifies the item, serial number, vendor, date of purchase, cost, location, and condition. Equipment purchased with Title funds is labeled with an asset tag. Physical inventories are conducted annually.

Inventory

Inventory of all equipment and property belonging to any federal program will be identified and inventoried twice yearly. The Title I Director will randomly spot-check equipment each Fall and a building-level administrator will verify an inventory of items purchased with Title funds each Spring. Materials purchased for use in Federal Programs will be labeled and be 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.

At the close of the federal program, or in the event the equipment is no longer usable, materials and equipment will be disposed of following the Barrow County School System's disposal procedures. Equipment that is damaged, lost, or stolen will be reported to the Title I Director using a Disposal Form. Damaged and inoperable equipment will be returned to each school's Media Center to be removed from inventory. A police report will be required for stolen property. Lost equipment will be verified by the principal and noted in the inventory. Disposed items must remain on inventory for a period of five years.

Lease of Equipment

The school system does not lease equipment using Title funds.

Use of Equipment in Targeted Assistance Schools

The school system does not have any targeted assistance schools.

Equipment Disposition Procedure

When computer equipment is no longer operational, it will be recycled or disposed of. A system Disposal Form must be completed and a copy sent to the Title I Director prior to the disposal of any equipment. Inventory records will need to be corrected, printed, and maintained at the school level. The Technology Department works with schools to dispose of and recycle all equipment.

In the event Title I equipment or technology is stolen, the following procedure will be followed:

1. File an incident report with the SRO
2. Attach the incident report to a Disposal Form and send to the Title I Director's office.
3. Make corrections to the Title I inventory.
4. Send the updated inventory to the Title I office. The principal must sign and date the inventory spreadsheet.

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 and English to Speakers of Other Languages (ESOL), 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 to ensure that complaints are resolved in a timely manner. See 'Appendix B: Complaint Procedures'

Ethics and Fraud, Waste and Abuse

The Title I Director reviews ethics and fraud, waste and abuse policies as it relates to Title programs, including Title I, Part A (Disadvantaged Children), Title I, Part C (Migrant Education Program), Title I, Part D (Neglected and Delinquent), Title II, Part A (Teacher and Leader Quality), Title III and English to Speakers of Other Languages (ESOL), 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 by the Title I

Director to document this has been completed. The Title I Director or Principals discuss the same information with their personnel. Each Principal or Director submits agendas and sign-in sheets to the Title I Director to verify the policies have been reviewed with all staff. A signature, by the person reviewing the policies, verifies the completion of this procedure. Principals are expected to inform their faculties about policies and updates as they are approved throughout the year.

Ethics

(e) 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.

Waste, Fraud, Abuse, Corruption

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 and English to Speakers of Other Languages (ESOL), 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 Finance Director 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.

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.

Allocation Procedures

Allocations

After receiving notification of the Title I, Part A grant amounts from GADOE, reservations in each budget are set aside for required components such as parent 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.

Budget Approval Process

- Funding amounts are approved by the GaDOE Board of Education
- Award letters are sent to districts
- Schools are given the allocated dollar amount for budgeting
- The budget is entered into the GaDOE Consolidated Application (electronic grant application process) by the program coordinator or authorized staff

- The budget is approved by the Program Coordinator
- The budget is approved by the Superintendent (budget may be rejected at this level and requests for revisions may be made)
- The budget is approved by the Program Specialist at the GaDOE (budget may be rejected at this level and requests for revisions may be made)

The budget is approved by GaDOE Accounting

Expenditure of Funds

Upon receiving allocations, each school will use a spreadsheet entitled “Blank Budget Worksheet and Narrative Template” to develop a budget for the use of federal funds. The spreadsheet will be shared with each Principal using Google Drive. Upon completion of the budgeting approval process with school and system Title funds, the budget will be entered into the Consolidated Application. Once approved by the GaDOE, the Finance Department will then enter the budget into the financial system software. The Finance Department will review the budget entered into the financial system against the Consolidated Application for accuracy and allowable use of funds. Any discrepancies between the budget entered in the local system and the Consolidated Application must be corrected prior to spending and draw-down of funds related to spending.

Spending will follow the pre-approval process throughout the spending period. The Finance Department or Title I Office will generate monthly reports. Monthly reports will be analyzed for expenditures against budgeted funds. The Title I Director will compare detailed monthly expenditure reports to the Consolidated Application monthly to ensure that expenditures are in accordance with the approved Consolidated Application.

Pre-Approval of Purchases

The Barrow County School System has procedures in place for Title Purchases to maintain internal controls and to avoid fraud, waste, and abuse of federal funds. All purchases must be pre-approved prior to an order being placed. This includes orders from RESA and other companies where orders can be placed online.

Set Asides/Reservation of Funds

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.

Flexible Learning Programs (FLP): The Barrow County School System set aside 5% for FLP in 2014-2015. However, Barrow County’s only Focus School, Winder-Barrow High School, met the exit criteria for removal from the Focus School list. Therefore, beginning with FY16, the district will no longer set aside funds for FLP unless a new school is designated as a Focus School. If the total 5% is not expended, the difference must be carried over to the following fiscal year.

Professional Development: No schools in the Barrow County School System are designated as a Priority School. The Georgia’s Flexibility Waiver no longer requires a set aside for professional learning. In order to promote continuous school improvement, the Barrow County School System will continue to pursue professional development to strengthen best practices in all classrooms.

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 Student Services Coordinator and the School Nutrition Department. 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.

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. The private school worksheet will be completed and attached to the Consolidated Application to ensure that all reservations related to parental involvement, instructional lead teachers, professional learning, and paraprofessionals have been reserved. The district uses the information provided by the GaDOE to determine reservations for parental involvement, FLP, Private Schools, indirect cost, and Neglected and Delinquent.

Rank Order

Schools are placed in rank order using the % of students that qualify for free and reduced priced meals.

Equitable Procedures for Private Schools

If Barrow County Schools has a private school to request funds, the private school students would receive their proportional share of services via per pupil allocation and required equitable services amounts. See Reservation of Funds. Eligibility criteria are used to determine the students who are most in need of services. Using assessment data provided by the private school, scores/levels are given ranges and point values are applied to those ranges.

When a private school determines that the school would like to participate in Title I or Title II, the district will determine the per pupil allocation for qualified students. The following guidelines will ensure appropriate and equitable participation.

E-1. Which private school students are eligible to receive benefits? Private school students who are enrolled in nonprofit private elementary and secondary schools, including those in religiously affiliated schools, located in the LEA generally are eligible to receive services. Some *ESEA* programs restrict eligibility or participation to a particular group of students, such as LEP students, in which case the eligibility or participation of private school students likewise is restricted. See the Department's guidance on individual programs for specific eligibility requirements.

E-2. Does the law require an LEA to provide equitable services to students and teachers in private for-profit schools? No. Section 9501(a) of *ESEA* requires an LEA to provide equitable services to teachers and students in "private elementary and secondary schools." Section 9101(18) and (38) of *ESEA* defines "elementary schools" and "secondary schools" to mean "nonprofit institutional day or residential school[s]" that provide elementary and secondary education, respectively.

Documentation for Participation

The private school must provide a copy of their 501(c)3 status.

Identification of Participants

LEA works closely with the private school to verify attendance area of possible students. It is the responsibility of the private school to provide potential students names, addresses, and verification of free and reduced participation for qualification of the student.

Draw Down Procedures

The Finance Department draws down funds as follows:

- All grants are divided by 12 months.
- Draw downs are done monthly. This is an acceptable practice to our financial auditors.
- Financial services is very careful to draw down these funds based on actual expenditure needs.
- The system Accounting Coordinator reconciles bank statements.
- The Director of Financial Services performs periodic review of the general ledger.
- There is no cash involved as all draw downs are directly deposited into our bank account.
- All reporting documentation is kept in Financial Services. It can be reviewed at any time.

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. Parent involvement, Flexible Learning Programs (FLP), and professional development for Alert, Focus, and Priority schools are taken into consideration.

Monitoring and Audits of Financial Processes

The Barrow County School System undergoes regular audits 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 correction 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 Title I Director will review all items. The Cross-Functional Monitoring report will be pulled from the GaDOE website under the Consolidated Application.
- Each item will be examined carefully, and a team of system level staff will determine the best means of corrective action.
- Items are gathered, and a report is written by the Title I Director.
- 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.

The monitoring process and the resolution process are both used as a learning resource.

Capital Expense Funds

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

Financial Reporting Procedures

Copies of completion reports for the previous fiscal year will be kept on file in the Finance Department. Accounting records to support the results of outlays (expenditures indicated in the completion report will be kept on file in the Finance Department). Copies of expenditure (cumulative through) reports for the respective quarter for total expenditures reported to GaDOE will be kept on file in the Finance Department. The Title I Office will run budget summary and detailed expenditure reports for all 400,402, 403, and 430 funds. Title I Director requires schools to analyze budget summary reports at least quarterly.

Homeless Students McKinney- Vento Homeless Education Assistance Act

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.

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.

Training

The liaison or designee will conduct training and sensitivity/awareness activities for the following LEA and school staff at least once each year: the Assistant Superintendent, principals, assistant principals, federal program administrators, registrars, school secretaries, school counselors, school social workers, bus drivers, custodians, cafeteria workers, school nurses and teachers. The liaison shall also obtain from every school the name and contact information of a building liaison. Building liaisons will lead and coordinate their schools' compliance with this policy and will receive training from the district liaison annually.

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.

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.

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.

Private Schools

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

Eligible private school children are those who:

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

Invitations for private schools to consult in participation in federal programs the following calendar year are sent in the fall, usually October, via receipt delivery. A meeting is held to present information about the programs available to students in private schools. All Federal Program Coordinators are invited to 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 Title I services for private school students. Currently Barrow County Schools is not serving any private schools.

Complaints

Complaints by the private school are filed in compliance with the LEA complaint process (see Complaint Procedure). All complaints will be addressed within 10 days of filing and will be resolved within 60 days according to the process.

Evaluation

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

Timeline

Month	Activity
October	<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. Hold Private School Meeting consultation
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 wishes 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"> • Visit site to determine services are rendered in accordance with federal requirements. Monitor all services regularly. • Visit site to determine services are rendered in accordance with federal requirements. • Monitor all services regularly. • Plan for evaluation of services with a survey at the end of April.

Academic Achievement Awards Program

Schools are selected for the program based on the schools' reward status as defined by the US Department of Education. Two categories of Reward Schools are eligible to be included receive awards:

(1) Highest-Performing Reward School –a Title I school among the Title I schools in the State that have the highest absolute performance over a number of years for the All Students group and for all subgroups based on statewide assessments, and, at the high school level, is also among the Title I schools with the highest graduation rates. A school may not be classified as a Highest-Performing School if there are significant achievement gaps across subgroups that are not closing in the school; or

(2) High-Progress Reward School – a Title I school among the ten percent of Title I schools in the State that are making the most progress in improving the performance of the ALL Students group over a number of years on the statewide assessments, and at the high school level, is also among the Title I schools in the State that are making the most progress in increasing graduation rates. A school may not be classified as a High-Progress school if there are significant achievement gaps across subgroups that are not closing in the school.

Reward Schools are required to complete a narrative and attach it narrative to the consolidated application when submitting budgets. Schools must provide a narrative description that summarizes the activities and materials to be funded using the Title I, Part A Reward Schools Award of the Title I, Part A Reward District Award for each school in the LEA or LEA receiving an award. The summary must delineate the decision making process utilized at each Reward School in the LEA or Reward District for determining the expenditure of the Title I, Part A Reward Schools and Reward Districts Award funds. Please include a listing of the staff with job titles involved in the decision making process.

- What processes and procedures does the school / LEA have in place to monitor the use of Title I, Part A Reward Schools / Districts Awards monies?
- What internal controls does the school / LEA have in place to promote efficiency of implementing the plans for this award, assure appropriate use and expenditure of Academic Achievement funds, and to safeguard assets and / or fraud and error?

Schools receiving monetary awards must use funds for educational purposes only:

- Resources / instructional materials
- Monetary awards for current year employees
- Schoowide projects; such as computer labs, materials and supplies for the media center, science labs

Expenditure of funds must be allowable and reasonable in accordance with OMB Circular A-87 and EDGAR 74.36.

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 MEP 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 by the GaDOE MEP of the District MEP Implementation Plan(s).

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.

Title II, Part A - Teacher and Leader Effectiveness

Purpose

The goal of the Title II-A program is for each school to have a teaching staff that is highly qualified and effective in helping all students, regardless of individual learning needs, achieve challenging state content and academic achievement standards. A secondary goal is for every student to have an equitable opportunity to receive quality instruction in terms of teacher quality, teacher experience, and class size.

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 measureable objectives that will ensure that all teachers teaching core academic subjects are and remain highly qualified.

Annual Needs Assessment Process

The Barrow County School System conducts its annual needs assessment in the spring of each year. One component of the process, a survey, is open to all administrators, teachers, and paraprofessionals and addresses the following equity components: highly qualified status of teachers and paraprofessionals, student access to experienced and effective teachers and leaders, teacher ability to meet the diverse needs of students, student access to comparable class sizes, and the retention and

recruitment of highly qualified and effective teachers and leaders. In addition, input on areas in need of improvement is solicited from school and district leaders by email and during regularly scheduled meetings with district and school administrators. Feedback is also solicited from community members and parents using a survey and during Title I planning meetings, monthly school council meetings, school governance meetings and public community forums.

Equity Plan

The Barrow County School System Equity Plan for Title II-A is revised each May/June using needs assessment survey and other forms of current data. The Equity Plan serves as the plan detailing professional learning and effective equitable practices among teachers. Department Directors, school and system leaders, as well as, community and parent stakeholders are to be involved in the revision process. As the Equity Plan is revised, it is shared with elementary, middle, and high school councils and school governance teams. Principals seek input from school council and school governance members (administrative staff, teachers, community business partners, and parents) and then give feedback for revisions. Meeting agendas and sign-in sheets will be maintained as evidence and documentation of stakeholder involvement in the revision process.

Prioritization of Needs

Internal and external stakeholders are involved in the planning process by assisting with the prioritizing of needs. Prioritization of needs is accomplished by analyzing the percentage of responses to various questions on the annual needs assessment. In addition, prioritization is discussed with stakeholders during meetings. Information gathered from various meetings is discussed during administrative meetings consisting of system and school leaders. System leaders then combine the feedback from various stakeholders and create a final prioritized list of needs.

Authorized Use of Funds

Title II funds can be used for recruitment, retention, professional development, and class size reduction. Title II-A funds must be used to *supplement, and not supplant*, non-Federal funds that would otherwise be used for activities authorized under Title II-A. It is presumed supplanting has occurred in the following circumstances:

- Title II-A funds for services that are required under other federal, state, or local laws
- Title II-A funds for services provided with non-Title II-A funds in the previous year.

Expenditures of Title II-A funds must be necessary to implement an activity designed to meet one or more of the annual prioritized needs, reasonable in cost and allocable to the Title II-A program.

Professional Learning

Professional Learning must be of research based, high quality, sustained, intensive, and classroom-focused in order to have a positive and lasting impact on classroom instruction and the teacher's performance in the classroom and are not 1-day or short-term workshops or conferences. It must also address one or more of the annual LEA prioritized needs. Finally, professional learning must focus on increasing the ability of the teaching staff to help all students achieve high academic standards, or the school administrative staff to lead their schools' efforts to increase student academic achievement

Highly Qualified Teachers

The Barrow County School System systematically monitors the Hi-Q status of its teachers based on demographics and a written remediation plan is created for each teacher who does not hold a valid clear renewable certificate or who is not highly qualified. The plan is monitored and supported with Title II-A funds. In compliance with the Elementary and Secondary Act, the Barrow County School System requires that all school principals have a remediation plan and monitoring log in place for all new hires, teachers

who do not hold a valid, clear renewable certificate and non-Hi-Q teachers at their school. These logs must be kept on file for periodic review.

Recruitment, Placement, and Retention of Highly Qualified, Effective Teachers and Leaders

System and school leaders discuss the recruitment, placement, and retention of highly qualified, effective teachers and leaders during quarterly meetings as necessary. The topic is also discussed at part of a review of data from the system annual needs assessment during the system leadership retreat held each summer. Specifically, each principal is required to report the level of retention from the previous school year and improvement with the placement of highly qualified, effective teachers for the upcoming school year. System and school goals are then created or adjusted for the next school year.

Teacher Experience and Effectiveness Equity

Teacher effectiveness is measured using two methods. First, informal focus walks are conducted at each school by administration and instructional coaches to gather data that can be used to guide professional learning activities. Secondly, administrators conduct formal observations as part of the Teacher Keys Effectiveness System.

Identified inequities in teacher experience will be addressed at the school and classroom level by re-assigning personnel and students as necessary to ensure that all students have equitable access to experienced teachers.

A list of inexperienced and ineffective teachers will be maintained at the school level. Rosters will be maintained for students assigned to any teacher on the lists. These rosters will be used the following school year to ensure that students are not assigned to an inexperienced and/or ineffective teacher two years in a row.

Class Size Equity

The LEA will address inequities in class size across and within schools by re-assigning students as necessary to achieve equity.

Meeting the Diverse Needs of Students

Focus walks are conducted by school personnel (administrators and instructional coaches) as part of a system initiative to ensure that all classrooms follow the guidelines of a standards-based classroom. One of the items on the observation checklist is the use of differentiation to meet the diverse needs of students. The data from these focus walks is compiled at the school and system level, examined by system and school instructional personnel and used to plan professional learning initiatives.

Procedures for HiQ

The Title I office, Title II Office, along with Human Resources, will maintain a list that includes the status of all Title I paid staff. All staff paid from Title I funds must be highly qualified.

Procedures for Principal's Attestations/Certifications

The Title I office will prepare a memorandum requesting principals sign the attestation forms for all Title I paid staff. Forms will be signed by the first of October and at the end May and submitted directly to the Title I office. This information will be maintained in the Title I and Title II office. A copy will be given to the Human Resources Department.

Procedures for Hiring Instructional Paraprofessionals

Paraprofessional vacancies are posted on the webpage for Barrow County Schools. A job description is included. Paraprofessional Education Requirements are listed, including:

- Do you currently hold paraprofessional certification?

- or, Do you have a minimum of an Associate’s Degree or higher in any subject?
- or, Have you successfully completed a minimum of 60 semester hours or 90 quarter hours of college coursework?
- or, Do you have a minimum of a high school diploma or GED, AND a passing score on the GACE (Georgia Assessments for the Certification of Educators) Paraprofessional Assessment?
- or, Do you have a minimum of a high school diploma or GED, and understand that you must take and pass the GACE paraprofessional Assessment to be eligible for a Georgia Paraprofessional Certificate.

This ensures that the applicants have met the minimum qualifications to be Highly Qualified. Highly qualified applicants are then eligible to interview with principals. Principals make recommendations to Human Resources, and recommended candidates are fingerprinted and complete other paperwork.

Procedures for Parent Notification of Non-HiQ

1. Principal will notify HR Specialist, Title I Director and Title II-A Coordinator, prior to hiring an employee who is not HiQ.
2. A determination will be made as to whether the parents of any students in the teacher’s class require written communication be sent home in any language other than English.
3. If it is determined that letters need to be sent home in Spanish, a generic letter template in English and Spanish will be made for use. The letter will be sent home double-sided (English on one side, Spanish on the other) for those students.
4. If it is determined that letters need to be sent home in a language other than English or Spanish, letters will be sent home in English and followed-up with a phone call using Language Line or an interpreter to ensure that those parents receive the notification in a language they can understand.
5. Letters will be prepared, approved, dated, signed, and mailed 1st class.
6. Each of the following must be provided to the Title II-A Coordinator:
 - a. a copy of signed, dated letter(s)
 - b. a mailing list of students
 - c. evidence of mailing (P.O. receipt, etc.)

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

Purpose

The goal is to prepare students for success in school and in society through the development of cultural awareness and English language proficiency in listening, speaking, reading, and writing.

Student Assessment and Enrollment Procedures

Student participation and progress in the ESOL program is measured using the WIDA ACCESS Placement Test (W-APT) for kindergarteners and the ACCESS exam for students in grades 1-12. All students enrolling in Barrow County Schools are surveyed to determine language background other than English. ESOL instructional support is provided after a student qualifies according to the WIDA-ACCESS Placement Test (W-APT). Eligible students are then assigned to a cluster site. English Learners (ELs) are assessed annually on the state-adopted English proficiency measure (ACCESS) to determine continued eligibility. (ACCESS=Assessing Comprehension and Communication in English State-to-State).

Parents have the right to select ESOL program services, remove their child from the ESOL program upon request, or decline ESOL services. After parents have received notification of student eligibility for enrollment in the ESOL program, they may request a waiver of services. Upon their request, the ESOL teacher will contact the parents to ensure a clear understanding of the services offered. If the parents continue to refuse services, the school will provide a parental waiver of ESOL services form for parental completion.

Exit Guidelines

According to GaDOE guidelines, “In order to exit language assistance services, 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. Kindergarten students who do not score an Accountability CPL of 5.0 or higher and who have any individual domain scores less than 5.0 are not eligible to exit language assistance services. Using the Language Assessment Conference (LAC) process to exit Kindergarten students who do not meet the specified exit criteria is not an option.

Students in grades 1-12 who score a Composite Performance Score of 5.0 or higher on the Tier C version of the ACCESS for ELLs and a “Meets Standards” score on the grade level state-mandated reading assessment are considered English proficient and are to be exited from language assistance services. In elementary grades one and two, where no state-mandated reading assessment is administered, an ACCESS for ELLs Composite Literacy Score of 4.7 or higher is used in lieu of the Reading score.

In the absence of a state-mandated reading assessment at the high school level, an English / Language Arts End of Course score or English / Language Arts High School Graduation Test score will be utilized in lieu of the reading assessment. In the absence of an English/Language Arts EOCT score in high school, a district may choose to utilize an alternate assessment approved by the district.

According to GaDOE guidelines, “ELs who meet the criteria for proficiency are no longer eligible for language assistance services and must be exited. Title III law requires that districts monitor ELs for 2 calendar years following exit from language assistance services. If an exited student transfers from another state or a private school and the two-year monitoring was not completed prior to enrollment, the district is required to monitor the student for the remainder of the monitoring period. The district must maintain documented evidence that the student was monitored throughout the two-year monitoring phase.” To ease the transition from served to monitored status, ESOL teachers continue to monitor student grades, attendance, and discipline to ensure students are progressing and performing well academically. ESOL teachers continue to correspond with regular education teachers of monitored students if the data indicates students may be struggling in one or more areas. If needed, the ESOL teachers meet with monitored students to assist them in any areas in which they may be struggling.

Funding

The Barrow County School System receives direct funding for ESOL students. These funds are used to purchase instructional materials and resources for the ESOL program. Specific requests are made to the Title III Coordinator.

Professional Learning

ESOL teachers will meet with every regular education teacher of EL students and administrators to ensure understanding of the WIDA standards and Can Do Descriptors. ESOL teachers will also provide WPT and ACCESS scores for every student and assist teachers with understanding appropriate expectations based on these scores and the student's level of language acquisition. The results of the annual needs assessment will also be used to determine agenda items for the teacher training. An ESOL professional learning plan has been developed and is updated annually. Two meetings will be held yearly with parents of EL students to inform them of ways to assist their students academically, as well as make them aware of school programs and activities.

Program Evaluation and Accountability

The success of the ESOL instructional program will be measured by analyzing the results of ACCESS and other state mandated tests. As a result of this analysis, differentiated instructional decisions will be made for individual students, including adjusting services if indicated. 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. The report will also include the number and percentage of EL students attaining English proficiency. Finally, the report will include content area mastery of monitored students.

Appendix A: Title I LEA Monitoring of Schools Form

**Barrow County School System
Title I LEA Monitoring of Schools Form**

School:			Date:
	M, DNM, NI, NA		Comments/Recommendations
I. School Compact			
II. Parental Involvement Plan			
III. Schoolwide Plan			
IV. Comprehensive LEA Improvement Plan			
V. Flexible Learning Plan			
VI. School Improvement Plan			
VII. Budgets - Title I-A Disadvantaged Students			
Title I-A School Improvement			
Title I-A Reward School			
VIII. Title I, Part C - Migrant Education			
IX. Title II: Highly Effective Teachers & Leaders			
X. Title III: ESOL			
XI. Homeless Programs - McKinney-Vento			
XII. Inventory			
Report Summary			
Corrective Action			
Resulting Technical Assistance			

Principal Signature _____ Date _____

Federal Programs Director _____ Date _____

Appendix B: Complaint Procedures

A. Grounds for a Complaint

Any individual, organization, or agency (“complainant”) may file a complaint with the Barrow County School System (BCSS) 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, Title I 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.

Barrow County School System

Tracking Form for Resolution of Complaints

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