

2023-2024

Trion City Schools



**Federal Programs
Processes and
Procedures Manual**

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Purpose of Federal Programs Handbook

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

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

Federal Programs Staff

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Title I- Parent and Family Engagement Specialist
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Title I, Part A - Family School Partnership Program
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Title I, Part A – Services for Neglected and Delinquent Children
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Foster Care and Homeless Liaison
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Title I, Part C – Education of Migratory Children
Angie Bowman, Director of Federal Programs & Curriculum

Title II, Part A – Improving Teacher Quality
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Title III, Part A – Language Instruction for English Learners and Immigrant Students
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Title IV, Part A – Student Support and Academic Enrichment
Angie Bowman, Director of Federal Programs & Curriculum

Title V Part A: Rural and Low Income School Education Initiative
Angie Bowman, Director of Federal Programs & Curriculum

IDEA 611– Individuals with Disabilities Education Act
IDEA 619- Special Education -Ages 3-5 (Preschool)
IDEA Georgia Parent Mentor Partnership Grant
Jessica Bramlett, Director of Student Support Services

ESSER Grants, and amendments or continuations of these grants and this statute-Elementary and Secondary School Emergency Relief
Angie Bowman, Director of Federal Programs and Curriculum
Jessica Bramlett, Director of Student Support Service
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Procedures Pertaining to All Federal Programs

LEA Monitoring of Schools Programs

ESEA: Sec 114(b)(3); Sec 1304; Sec. 1306; Sec. 2104(a)(1); 2 CFR 200.301, 34 CFR 300; McKinney Vento Sec. 722(c)(3)(E) 2CFR 200.329; Non-Regulatory Guidance: Using Evidence to Strengthen Education Investments(2016)

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

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

- (a) Federal Program Directors will conduct self-monitoring of its schools and programs sufficient to ensure compliance with requirements, including Title I, Part A (Disadvantaged Children), Title I, Part C (Migrant Education Program), Title I, Part D (Neglected and Delinquent), Title II, Part A (Teacher and Leader Quality), Title III (English Learners & Immigrant Students), Title IV, Part A (Student Support and Academic Enrichment) and Title X, Part C (McKinney-Vento Education for Homeless), and Individual Disabilities Education Act (IDEA). ESSER grants are not included in the above regulation. ESSER is comprised of CARES, CRRSA and ARP. CARES & CRRSA grants are now closed.
- (b) Federal Program Directors will undergo training from GaDOE and other sources to maintain proficiency in program compliance requirements.
- (c) Federal Program Directors will provide technical assistance to local schools.
- (d) Federal Program Directors' self-monitoring will include monitoring all program expenditures to verify that all expenditures comply with program requirements.
- (e) Federal Program Directors will maintain all documentation the LEA may need for future auditing/monitoring.
- (f) In years when LEA does not receive an on-site visit, Federal Program Directors will complete the

Self-Assessment Checklist and submit it to the Georgia Department of Education (GaDOE) as requested.

(g) LEA will undergo monitoring by GaDOE on a published cycle. LEA Federal Program Directors will participate in training and technical assistance updates as provided by GaDOE prior to monitoring visits.

(h) After the on-site and/or online monitoring, the LEA will receive a comprehensive monitoring report, which will contain recommendations, findings, and required actions that together provide an analysis of the implementation of the LEA's federal programs. If a Corrective Action Plan is required, the LEA Federal Program Directors will respond in a timely manner with a Corrective Action Plan, which must be approved by GaDOE. The appropriate GaDOE Program Specialist will monitor implementation of the Corrective Action Plan.

Required Monitoring Components

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. GaDOE Program Specialists review each application and budget to ensure that expenditures are appropriate for the program area before approving LEA budgets. Once budgets are approved, GaDOE Education Program Specialists track how well LEAs are requesting funds for expenditures to ensure that LEAs are likely to meet the expenditure requirements for each federal program.
2. Single Audit – LEAs with single audit findings are flagged for technical assistance.
3. On-site/Online Monitoring – A GaDOE on-site Cross-Functional Monitoring Team visits the school system to apply the criteria included in a GaDOE monitoring document.
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) as requested.

On-Site/Online Monitoring Procedures

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

- **Selection of LEAs to be monitored.**
 - LEAs are currently cross functionally monitored on a five-year cycle.
 - LEAs online submission must be completed two weeks prior to the assigned monitoring date.

- LEAs must label and submit documents through SLD Cross-Functional Monitoring or approved method.
- 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 evidence serious or chronic compliance problems.

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

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

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

Description of the Documentation for the Monitoring Process, Technical Assistance and Required Corrective Action Plans

Each Director of Federal Programs provides technical assistance on grant implementation through technical assistance meetings, phone calls, emails and feedback. Documentation to ensure compliance may include budgets, observation forms, data collection forms checklists, meeting resources (sign-in sheets, agendas, notes, presentation materials), emails and phone logs.

Technical assistance regarding federal grants is provided throughout the year. Professional learning is provided based on needs; furthermore, in addition, professional learning is used as a preventive measure to ensure all federal grant staff have a clear understanding of all expectations of the federal award.

The grant administrators responsible for overseeing Elementary and Secondary School Emergency Relief Programs and Individuals with Disabilities Education Act (ESSA/IDEA) requirements include all programs and implementation at the District and school level (where applicable) are as follows:

- Title I, Part A: Improving the Academic Achievement of the Disadvantaged–Director of Federal Programs;
 - o Homeless-Federal Programs Director
 - o Foster Care- Federal Programs Director
 - o Neglected and Delinquent-Federal Programs Director
 - o Professional Qualifications– Human Resources Director
- Title I, Part C: Education of Migratory Children-Federal Programs Director
- Title II, Part A: Supporting Effective Instruction-Federal Programs Director
- Title III, Part A: Language Instruction for English Learners and Immigrant Students– Federal Programs Director
- Title IV, Part A: Student Support and Academic Enrichment–Federal Programs Director
 - Title V, Part A: Student Support and Academic Enrichment–Federal Programs Director
- Title IX, Part A - Title IX Coordinator
- McKinney-Vento Homeless Assistance Act: Federal Programs Director
- IDEA: Individuals with Disabilities Education Act–Student Support Services Director
- ESSER: Financial Director, Student Support Services Director, and Federal Programs Director

Grant implementation includes the following topics but is not limited to:

- Budgets;
- Planning;
- Compliance;
- School Improvement;
- Fiscal Requirements;

- Inventory (Title I, Title III, Title IV, Title V, IDEA, ESSER); and
- Family-School Partnership Program (Title I).

Documentation maintained to verify technical assistance and monitoring of the program includes, but is not limited to:

- Timelines;
- Agendas;
- Google Forms;
- Sign-in Sheets;
- Notes or Presentations;
- District / School website staff;
- Handouts; and
- Emails or Phone Logs.

Each program administrator or designee will keep specific documentation for the grant they administer. Grant specific documentation includes:

- Title I, Part A:
 - o Beginning of the Year Meeting with Principals, Director of Student Support Services, Finance Director, and leadership team
 - o Technical Assistance Meetings, as needed
 - o Title I Funded Personnel Verification (Semester 1 and Semester 2)
 - o Title I Funded Schoolwide Personnel Schedules
 - o CNA/SWP (Original and Revisions) and Checklist
 - o Documentation of Stakeholder Involvement in SWP
 - o Budget (Original and Amendments) and Checklist
 - o Carryover Worksheet
 - o Professional Development Documentation (Sign in Sheet, Agenda, Notes/PPT, Surveys, Ongoing Documentation) and Checklist
 - o Annual Periodic Certifications, as needed
 - o Supplements Documentation
 - o Inventory Verification
 - o Logic Model Rationales
 - o End of Year Evaluation
 - o Completion Reports
- Homeless Set-Aside:
 - o List of Homeless Children and Unaccompanied Youth
 - o Professional Development received by the Homeless Liaison
 - o Documentation notifying stakeholders of the Homeless Liaison's contact information
 - o Collaborative planning with leadership regarding transportation

- o Evidence of comparable services for Homeless Students
- o Evidence of collaboration with agencies to support Homeless Children and Youth
- Foster Care Set-Aside:
 - o Collaborative planning with Local Child Welfare Agencies
 - o Evidence of collaboration between Social Workers and other agencies to support Children in Foster Care
- Family/Parent School-Partnership Program:
 - o Parent Engagement Facilitator Professional Learning/Technical Assistance
 - o Spring Parent Survey
 - o District and School Parent and Family Engagement Plans
 - o School-Parent Compacts
 - o Title I Annual Meetings
 - o Checklists:
 - Parent and Family Engagement Input
 - Distribution
 - School Parent and Family Engagement Plan
 - School-Parent Compact
 - Building the Capacity of Staff
 - Building the Capacity of Parents
- Neglected and Delinquent:
 - o Annual Survey of Local Residential Child Care Institutions
 - o Tutoring Services Provided to Neglected Students (timesheets)
 - o Evidence of Collaborative Planning
 - o Spring Tutoring Survey (Students, Tutors and Facilities)
 - o Parent and Family Engagement Plans (District)
- Title II Part A:
 - o Budget (original and amendments)
 - o Previous Year's Effectiveness Plan with Source Documentation
 - o Current Year's Budget Assertions and Effectiveness
 - o Progress Toward monitoring and implementing the Equity Action Plan
 - o Progress toward monitoring and implementing the CLIP
 - o Completion Reports
- Title III Part A:
 - o Budget (original and amendments)
 - o Logic Models

- o Professional Development Documentation
 - o Periodic Certifications for federally funded staff
 - o Inventory Reports
 - o Completion Reports
 - o Progress Toward Monitoring and Implementing the Equity Action Plan
 - o Progress Toward Monitoring and Implementing the CLIP
- Title IV Part A:
 - o Budget (original and amendments)
 - o Logic Models
 - o Periodic Certifications for Substitutes
 - o Ongoing Stakeholder Community-based Partner Engagement
 - o Progress Toward Monitoring and Implementing the CLIP
- Title V:
 - o Budget (original and amendments)
 - o Professional Development Documentation
 - o Periodic Certifications for federally funded staff
 - o Logic Models
 - o Inventory Reports
 - o Completion Reports
 - o Progress Toward Monitoring and Implementing the Equity Action Plan
 - o Progress Toward Monitoring and Implementing the CLIP
- IDEA:
 - o Budget (original and amendments)
 - o Professional Development Documentation
 - o Periodic Certifications for federally funded staff
 - o Inventory Reports
 - o Logic Models
 - o Progress Toward Monitoring and Implementing the Equity Action Plan
 - o Progress Toward Monitoring and Implementing the CLIP
 - o Completion Reports
- ESSER Grants
 - o Logic Models
 - o Supplements Documentation
 - o Annual Periodic Certifications, as necessary
 - o Implementation Plan Overview
 - o Inventory

- o Six month ARP monitoring
- o Professional Development Documentation (Sign in Sheet, Agenda, Notes/PPT, Surveys) and Checklist

Monitoring Processes and Procedures

Positions Responsible for Implementation and Monitoring of Procedures

The Directors of Federal Programs will coordinate and provide support to each school receiving federal funds. The Directors implement and monitor the procedures contained in this handbook.

Technical Assistance Frequency of Monitoring (Timeline)

Technical assistance is provided to all participating schools following the GaDOE Federal Programs guidance to update principals on any new guidelines and to provide guidance for new principals. Sessions will include the following topics: budgets, ordering, compliance, parental involvement, professional learning, meeting the needs of students, schoolwide programs, monitoring, academic achievement, inventory, scheduling, ethics, fraud and waste, and complaint procedures. Sessions will include representation from the following programs: Title I, Part A (Disadvantaged Students), Title I, Part C (Migrant Education Program), Title II, Part A (Teacher and Leader Quality), Title III (English Learners & Immigrant Students), Title X, Part C, (McKinney-Vento Education for Homeless), Individuals with Disabilities Education Act (IDEA), and ESSER. Periodic monitoring of activities is conducted by Directors of Federal Programs and/or designees as indicated in the timeline document located within the manual.

Grant Specific Timelines

On-Site Monitoring Procedures

ESEA: 2101(d)(2)(E), Georgia EAEE; ESEA: Sec. 1111(d)(1)(B)(vi), Section 1111(d)(2)(B)(iv), Section 1112(b)(1) ESEA: Sec. 4105(a); 4104(a)(2); ESEA: Sec. 4106(c)(1-2); 4106(e)(2)(A)

All schools receiving federal funding are subjected to on-going monitoring by the Directors of Federal Programs throughout the school year.

June/ July

- Collaborate with principals on annual revision of Compact, School Improvement Plan, and Parent and Family Engagement plans along with federal program budgets (if available). All departments submit final revisions of CLIP to the Director of Federal Programs by June 15th.
- All Federal Program directors will review plans and budgets to ensure funds are being spent according to plans and that plans have all necessary components.
- Submit the School Improvement Plan for review/approval.
- CLIP due to GaDOE by June 30th.
- Notify any schools, if required, to provide intervention services because of needs improvement status and assist schools with creating and mailing any required notifications to parents.
- Meet with principals, as needed. Provide additional training, as needed.

August

- Submit names of Federal Programs Paid Employees (Teachers/ Paraprofessionals)
- Submit Paraprofessional Daily Schedules for review/approval
- Submit Federal Programs Certified Staff daily schedule for review/approval
- Annual Title I Meeting Window Begins
- Submit a copy of “Parent’s Right to Know” letter for review/approval
- Parent and Family Engagement Specialist Schedule due
- Parent’s Right to Know/School Status letter sent to parents
- Post Parent’s Right to Know Letters via student handbook on school websites

September

- August Monthly Signed Class Schedules-Split-Funded Personnel due
- August Monthly Signed Time and Effort sheets due
- Director of Technology completes onsite inventory of all federal inventory every 2 years bases on established cycle

October

- All Federal Program budgets due in Consolidated Application—Oct. 1
- ARP 6 month monitoring
- September Monthly Signed Class Schedules- Split-Funded personnel due

- September Monthly Signed Time and Effort sheets due
- Copies of Parent and Family Involvement Plans placed in Parent Resource room
- Submit Annual Title I Meeting documents (after school meeting)
- Deadline for Annual title I Meeting (October 31st)
- School Parental Involvement Plans due for review/ approval
- School Parent Compacts due for review/ approval
- Distribution of School Parent Compacts and Parent Involvement Plans (deadline)
- School Parent Compact due with checklist
- Distribution of Parental Involvement Plans. Plans posted on Trion City School's website.
- Submit three-five samples of complete School-Parent Compacts per grade level
- Deadline to notify parents of the location of the School Improvement Plan Meeting
- Deadline to notify parents of the location of the Parent Resource Center
- Deadline for all parent documents to be posted on Parent and Family Engagement section to the school's website (Compacts, Parent Involvement Plans, Parent Right to Know, and School Improvement Plan).
- Completion Reports for all Federal Programs reviewed by Directors of Federal Programs with the Director of Finance

November

- October Monthly Signed Class Schedules and Split Funded Personnel due
- October Monthly Signed Time and Effort Sheets due

December

- November Monthly Signed Class Schedules and Split Funded Personnel due
- November Monthly Signed Time and Effort Sheets due
- Conduct fall progress monitoring on identified goals toward attainment of school improvement goals and action steps.

January

- December Monthly Signed Class Schedules and Split Funded Personnel due
- December Monthly Signed Time and Effort Sheets due

February

- January Monthly Signed Class Schedules and Split Funded Personnel due
- January Monthly Signed Time and Effort Sheets due

March

- February Monthly Signed Class Schedules and Split Funded Personnel due
- February Monthly Signed Time and Effort Sheets due
- Conduct annual comprehensive needs assessment. Data is provided to system and school leaders so each can compile data to determine prioritized needs for the following year.

April

- March Monthly Signed Class Schedules and Split Funded Personnel due
- March Monthly Signed Time and Effort Sheets due
- Summary of stakeholder survey due
- Begin review/ revisions of Title I Parent Involvement, Title I School Improvement Plan, and School Parent Compacts
- Stakeholder survey closes

May

- April Monthly Signed Class Schedules and Split Funded Personnel due
- April Monthly Signed Time and Effort Sheets due
- Spring Title I Input meeting
- Deadline for Spring Title I Input meeting documents (revision of compacts, including school specific needs/ goals, revision of Parent Involvement Plans, 1% of Parent Involvement Budget input).
- Submit End of the Year Family and Parent Engagement Specialist evaluation
- Final Budget Amendments for all federal programs

June

- May Monthly Signed Class Schedules and Split Funded Personnel due
- May Monthly Signed Time and Effort Sheets due
- Periodic Certification for all Personnel Fully Funded (100%) by all Federal Program Directors

Ongoing Throughout the School Year

- Work with principals on annual revision of plans. The Directors of Federal Programs review the plans and the budgets to ensure funds are being spent according to the plan and the plan has all the necessary components.
- Periodically meet with principals as needed. Additional training as needed.
- Director of Technology Inventory all items purchased by federal funds once every 2 years based on established schedule
- Homeless and N&D programs are monitored by the Federal Program Director.
- On-going review of school improvement data and plans in conjunction with other central office staff.
- The Director of Federal Programs makes on-site visits to review the progress of the school wide plan, and school improvement plan.

- Budgets are reviewed monthly/quarterly based on expenditures and each purchase order is examined by federal program directors to ensure purchases are allocable, reasonable, and necessary and that items purchased are supporting strategies contained in the system and/or school improvement plans.

Needed Corrective Actions at Schools (Identified by LEA)

The corrective actions listed within the Federal Programs School Monitoring Checklist must be addressed by school leaders because of technical assistance provided by Federal Program Directors and other district leaders. Professional learning is provided based on needs. In addition, professional learning is used as a preventive measure to ensure all personnel have a clear understanding of all expectations for every facet of the various federal programs. Federal Program Directors, along with other district level staff and outside consultants, provide ongoing training as a means of ensuring the system and schools always comply. A reasonable timeline for addressing corrective actions will be agreed upon by school and district leaders and adhered to by all parties.

Verification of Corrective Actions at Schools

Corrective actions, findings, areas of concern, and recommendations received through monitoring feedback are discussed with principals to assist them in understanding the critical need for compliance with federal guidelines. Verification of corrective action will be determined through ongoing technical assistance provided to the school and documented on the Federal Programs School Monitoring Checklist.

District Review of Applicable Federal Program Budgets

The Federal Programs Director, in collaboration with school principals, superintendent, and the finance director, develop and submit federally funded budgets that align to needs identified in the schools and district improvement plans. The Federal Program Directors ensure all funds budgeted are allowable per funding source. The Federal Program Director analyzes budget summary reports at least quarterly. Completion reports are annual reports required by Georgia Department of Education (GaDOE) for all grant funds. Reports are due 30 days after the end date for each grant. Prior to preparing the completion report, the general ledger report for each grant will be reviewed to ensure all expenditure postings are correctly recorded.

Identification of High-Risk Schools

The Federal Programs School Monitoring Checklist will be used to identify schools that are at high risk of

not properly operating various federal programs. Any school failing to achieve check off on ten or more required components will be considered at risk and will be required to develop a more comprehensive short-term corrective action plan with specific dates for accomplishing corrective action steps.

Grant Specific Procedures

IDEA- Procedures for Monitoring Schools and Programs Student Support Teams

IDEA

The Student Support Services Director ensures the Special Education Guidelines are updated annually. The Guidelines are posted in the Student Support Services Manual for all staff to access. The Student Support Services Director provides training annually within the first semester or as updates occur throughout the year to teachers at each school based on DOE guidelines. New teachers and teachers in need of additional review, as determined by their school administrator, can participate in additional training with the Student Support Services Director. If corrective action is needed, documentation is noted in emails. If needed, a corrective action plan is developed including steps and a timeline to correct the issue. Additionally, the Student Support Services Director meets, at a minimum quarterly, with TCS leadership (school principals, the Director of Federal Programs, Superintendent and/or other staff members), as needed. The focus of the meetings includes, but is not limited to:

- Identified academic deficits related to learning loss
- Progress toward Equity Action Plan
- Consolidated LEA Improvement Plan (CLIP)
- Corrective action plans, if needed.

The school level RTI coordinator, Director of Curriculum, Director of Student Support Services, and the School Psychologist monitor procedural compliance regarding tiered interventions. The identified school level RTI coordinator conducts random RTI/SST file compliance checks throughout the school year to review plans for compliance and fidelity. The School Psychologist reviews files and provides support and guidance regarding progress monitoring. All administrators at the school level are expected to be an integral part of the RTI/SST process and remain actively involved with all aspects of the process including professional learning,

monitoring meetings, implementation of research-based practices, etc.

Schools that are found to be out of compliance are provided intensive one-on-one technical assistance and support from the Curriculum Director. Staff members who are found out of compliance will be provided with continued professional learning and/or one-on-one assistance by the school level RTI coordinator. When staff members continue to have trouble after technical assistance has been provided, the Curriculum Director will be responsible for determining the next steps in support.

Child Find

The Preschool Program Coordinator, Director of Student Support Services and Parent Mentor hold meetings, as needed, during which Child Find procedures for Preschool age children are continually monitored through a referral list that is updated monthly. The Parent Mentor receives monthly Child Find updates from the local Head Start and Babies Can't Wait. Universal screeners are completed at the elementary, middle, and high school levels to aid in Child Find: students demonstrating areas of need are then referred to the RTI/SST committee which monitors student progress.

If Child Find Procedures are not followed, additional training and technical support will be provided by the Director of Student Support Services, Program Specialists and/or designated school staff (e.g., assistant principals, special education department chairs, counselors, etc.).

The Director of Student Services reviews the Homeschool Report in SLDS periodically to identify SWDs who are participating in homeschool programs or attending a private school to ensure students are identified and supported.

Professional Learning

Existing TCS Student Support Service teachers, Director of Student Support Services, and the School Psychologists, will provide ongoing professional learning for special education policies and procedures regarding Evaluations and Reevaluations throughout each school year. The Director of Student Support Services provides up-to-date training and information regarding evaluations. Furthermore, the Director of Student Support Services provides training to building-level administrators during regular, instructional district leadership meetings. School Psychologist, in conjunction with the Director of Student Support Services, provides supplementary professional learning to teachers regarding referral packet requirements, the Initial Timelines Calendar, progress monitoring procedures, and the administration of achievement measures, behavior rating scales and adaptive behavior assessments. Moreover, the school level RTI Coordinator provides professional learning to teachers and support staff, who then train the staff on compliant RTI practices.

New TCS Student Support Services teachers: Teachers new to the Trion City School System are trained in special education policies and procedures related to evaluations and reevaluations through a new teacher training provided by the Student Support Services Director at the beginning of each school year. They also

participate in ongoing professional learning that is provided for existing teachers, as described above, as well as professional learning provided by administration and other support staff. Additionally, new Special Education Teachers are assigned a veteran mentor teacher in their school building to provide support and guidance regarding evaluations and reevaluations throughout the school year.

Evidence of Training

Professional learning will be documented through agendas, sign-in sheets, and end of year policy and procedure checklists. This documentation will be stored electronically on Google Drive and originals will be maintained in the Special Education Administrative Assistant's office.

IDEA- Supervision and Monitoring

Evaluation/ Re-evaluation Monitoring Procedures: At the beginning of the school year, the School Psychologist reviews all initial referrals to prioritize them. He or she collaborates with the Director of Student Support Services on the Yearly Special Education Timelines Report, documenting initial evaluations, allowing them to monitor all initial timelines for TCS. The Director of Student Support Services also pulls a report of the Reevaluation Data Reviews that are due during the current school year, shares that information with the Student Support Services, Administrative Assistant and School Psychologist, and monitors these throughout the year.

The Director of Student Support Services monitors the GO-IEP Dashboard for eligibility timelines routinely and follow-up with Students Support Services Case Managers when students are approaching critical timelines. If a concern arises, the Student Support Services Director will conference with the teacher(s) to provide support in adhering to compliance evaluation practices. Student Support Services Teachers are also asked to monitor their GO-IEP Dashboard weekly, so they are continuously aware of timelines related to evaluations and reevaluations. Additionally, teachers are asked to sign off on the TCS Special Education Policy and Procedure Checklist, verifying understanding of their responsibilities as it pertains to evaluations and reevaluations throughout the school year.

Technical Assistance

Teachers who require additional technical assistance with policies and procedures related to evaluations and reevaluations will be provided with technical assistance and support through training, one-to-one conferences, webinars, and/or professional learning plans from the Director of Student Support Services. If teachers continue to have difficulty despite the technical assistance they receive, building-level administrators will be notified so they may determine next steps to ensure remediation and compliance.

Eligibility

The Director of Student Support Services monitors Eligibility and Categories of Eligibility by reviewing the

associated data and their trends. The Director of Student Support Services collaborates with the Data Coordinator, as well as other district leaders by reviewing eligibility data and their trends for students with disabilities. If concerns arise, the Director of Student Support Services will meet with the district leadership team and/or school-level administration to provide technical assistance.

Teachers who require additional technical assistance with policies and procedures regarding Eligibility Determination and Categories of Eligibility will be provided with technical assistance and support through training, one-to-one conferences, webinars, and/or professional learning plans. If teachers continue to have difficulty despite the technical assistance they receive, building-level administrators will be notified so they may determine next steps to ensure remediation and compliance.

Discipline

The Director of Student Support Services and Student Support Services administrative assistant monitors district and individual school compliance with discipline policy and procedure by reviewing the associated data and their trends. The Director of Student Support Services collaborates with the principals, as well as other district leaders, by reviewing discipline data and their trends for students with disabilities. If concerns arise, the Director of Student Support Services will meet with the district leadership team and/or school-level administration to provide technical assistance.

Title III - Language Instruction for English Learners

ESEA/ESSA Sec. 3113(b)(2), ESEA/ESSA Sec. 1112(e)(3)

Student Assessment and Enrollment Procedures

A student who may be an English Learner must be assessed for such status within 30 days of enrollment. All students enrolling in Trion City Schools are surveyed to determine language background other than English. Student participation in the ESOL program is measured using the WIDA Kindergarten ACCESS Screener Test for kindergarten students and the ACCESS Screener for students in grades 1-12. The screening assessment is determined based on the responses indicated on the Home Language Survey. ESOL instructional support is provided after a student qualifies according to the WIDA ACCESS Screener. 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).

Beginning in the 2021-2022 school year, only the new WIDA Screener for Kindergarten will be used to screen potential ELs enrolling in Kindergarten and 1st Semester Grade 1. Test administrators must enter the student's score results into the WIDA Score Calculator to generate a WIDA ELP Screener Score Report of the English language proficiency level indicated by the student's responses.

See EL Eligibility Flowchart

Kindergarten and 1st Semester Grade 1 -For students enrolling in 1st Semester Kindergarten:

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

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

1. Administer all four components of WIDA Screener for Kindergarten: Listening, Speaking, Reading, and Writing.

2. If the student's Overall Composite Proficiency Level score is < 5.0 , the student qualifies and is identified as an English Learner and is coded as such in the LEA's Student Information System (SIS).

3. If the student's Overall Composite Proficiency Level score is ≥ 5.0 , the student Does Not Qualify (DNQ) as an English Learner and is coded EL=No. NOTE: Although WIDA recommends that Kindergarten Screener proficiency level

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 with a writing domain of 4.5 to be eligible to exit.. 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.

Students in grades 1-12 who score a Composite Performance Score of 5.0 or higher 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.

TCS selects to consider possible EL Exit for students scoring between CPL 4.3 – 4.9 as indicated in the ESOL handbook. An EL Reclassification Review Team decision to exit or not to exit is utilized in the determination process. TCS policy has been submitted and approved by the state of Georgia.

If the Overall Composite Proficiency Level (CPL) is > 5.0 , then the student no longer qualifies for English learner status and must be exited using an end-of-school-year date or June 30. This EL Status Exit Date may not be recorded in the SIS until the beginning of the new school year (after July 1).

Professional Learning

The ESOL coordinator will meet with ESOL and regular education teachers of EL students and administrators to ensure understanding of the WIDA standards and Performance Descriptors. ESOL teachers will also provide ACCESS scores for all EL students to ensure appropriate expectations based on the scores and the student's level of language acquisition is understood. 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, ELP Growth Model reports, 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.

Title I, Part A

The Director of Federal Programs or designee conducts self-monitoring of schools and programs to ensure compliance with federal program requirements. At the beginning of each school year, a meeting is conducted by the Director of Federal Programs with all Title I School principals. Additionally, the Director of Federal Programs provides technical assistance and onsite visits, at a minimum quarterly, with Title I school principals and other staff members, as needed. The focus of the principal meetings includes but is not limited to:

- Consolidated LEA Improvement Plan (CLIP);
- Schoolwide Plan (SWP)
- Title I Status;
- Confirmation of Title I funded personnel;
- Materials needed by the school; and
- Corrective action plans, if needed.

Throughout the year, the Director of Federal Programs monitors program expenditures to verify all program expenditures comply with federal program requirements. Title I principals are encouraged to email and/or call the Director of Federal Programs if concerns occur before the scheduled onsite meetings. All documentation the district may need for future auditing/monitoring is maintained in the district office according to the Cross-Functional Monitoring Document which is issued annually by the GaDOE.

In addition to formal meetings, informal meetings, phone calls and e-mails provide additional technical assistance and monitoring feedback. E-mail often serves as calendar reminders for item due dates. If/when schools need to correct or resubmit an item, either a meeting is held, a phone call is made, or an e-mail is sent describing the issue and how to correct it.

Title I, Part A- Neglected and Delinquent

TCS currently does not have identified Neglected and Delinquent facilities within the district. If one were identified, then a meeting would be conducted by the Director of Federal Programs or designee with the Neglected and Delinquent facilities in late July or early August. The focus/discussion for the above meeting would include, but is not limited to:

- Changes or clarifications directed by the state in regulations for documentation of compliance for Title I;
- Agreement with the facilities and responsibilities of each party;
- Services provided by the Trion City Schools District;
- Academic and/or other needs of each facility;
- Possible programs and materials needed by each facility; and

- Title I equipment.

The Director of Federal Programs or designee would conduct a visit/meeting each quarter, as needed, to discuss the above items. Additionally, ongoing communication between meetings would be conducted through email and phone calls. The facility director or other designated personnel would also be encouraged to email and/or call the Director of Federal Programs and/or Title I Administrator on Special Assignment if concerns occur before the scheduled quarterly meetings.

The Director of Federal Programs or designee would collect data and documentation from each facility to complete the required Title I monitoring process. Inventory at each facility would be physically checked by the Director of Technology or designated Technology staff once every two years. Throughout the year, the Director of Federal Programs would monitor program expenditures to verify all program expenditures comply with federal program requirements.

After the Title I monitoring process was completed, all required corrective actions would be discussed by the Director of Federal Programs, if needed. The corrections would be written and submitted to the state by the Director of Federal Programs. All documentation that the District would need for future auditing/monitoring would be maintained in the district office according to the Cross-Functional Monitoring Document which is issued annually by the GaDOE.

In addition to formal meetings, informal meetings, phone calls and e-mails would be provided for additional technical assistance and monitoring feedback. E-mail often serves as calendar reminders for item due dates. If/when facilities need to correct or resubmit an item, either a meeting would be held, a phone call would be made, or an e-mail would be sent describing the issue and how to correct it.

Title I, Part A- Homeless Children and Youths

The Homeless Liaison works to ensure compliance with federal program requirements. The Homeless Liaison meets with other Federal Programs staff to discuss the following:

- CLIP;
- Budget;
- Review of District data;
- Materials needed for homeless students;
- Any changes or clarifications directed by the state in regulations for documentation of compliance for Homeless; and
- Monitoring for federal compliance.

Throughout the year, the Director of Federal Programs monitors expenditures to verify that all comply with federal program requirements. All documentation that the District may need for future auditing/monitoring is maintained in the district office according to the LEA Monitoring Form which is issued annually by the GaDOE.

In addition to formal meetings, informal meetings, phone calls, and e-mails provide additional technical assistance and monitoring feedback. E-mail often serves as calendar reminders for item due dates. If/when schools need to correct or resubmit an item, either a meeting is held, a phone call is made, or an e-mail is sent describing the issue and how to correct it.

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

Trion City School district uses the occupational survey provided by the MEP coordinator to identify migrant students. A system liaison from the Migrant Education Program (MEP) makes contact with each migrant family to determine case-by-case eligibility and needs. Migrant students are evaluated academically the same as other students in the system to determine academic needs. 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 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. Parent outreach is provided in a language that is understood by the family if at all possible. A translator is used for translation when needed. 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 educational agency. Presenters from local agencies such as the Health Department, DFACS, and County Extension office may be involved.

Title II, Part A – Supporting Effective Instruction

Trion City Schools transfers 100% of its Title II, Part A funds to Title I. The goal of the Title II, Part A program is to ensure each school in the district has effective teacher and staff members that works to meet the diverse needs of all students regardless of individual learning needs. As a result of this program, teachers, paraprofessionals, and school leaders are prepared to effectively assist all students in achieving state content and academic achievement standards. Another goal of this program is for every student to have equitable opportunities to receive quality instruction in terms of teacher quality, teacher experience, and class size.

Belief Statement : Trion City Schools believes all students should have equitable opportunities to quality instructional programs with regard to teacher quality, experience, and training to meet the diverse learning needs of all students and class size. The district practices recruitment and retention of teachers through monitoring processes (data reviews and job-embedded professional learning through high functioning professional learning communities) and ensure that supports are in place to grow and retain quality educators.

Annual Needs Assessment Procedures

In the spring, principals receive guidance led by the director of federal programs on how to hold school-based needs assessment meetings with parents, teachers, and community stakeholders. The district needs assessment is conducted so school administrators can replicate the process with stakeholders during school-based planning meetings as input is gathered. A survey is conducted to determine school personnel, parents, and the community's perceptions on teacher effectiveness, retention, and recruitment. This dialogue is then discussed with the administrators to provide further input on the schools' needs. In the next phase of annual needs assessment planning, the superintendent, assistant superintendent, principals, teachers, parents, students, community members, and business representatives review district data and state assessment data, to determine the extent to which equitable opportunities exist for all students, including economically disadvantaged and minority students. State test data for all subgroups is disaggregated by grade level and comparisons are made with the previous annual review. In addition, survey and focus group data is used to determine needs and professional learning gaps of teachers to help them meet the diverse learning needs of their students. CCRPI scores and internal district and school data are used to identify indicators related to grade level promotion, graduation rates, and students in gifted, honors, and Advanced Placement classes. Data is analyzed to ensure: (a) equitable access to effective teachers and paraprofessionals; (b) equity in teacher experience; (c) equity in teacher training to meet diverse student needs; (d) equity in class sizes; and (e) recruitment and retention of highly effective teachers. CCRPI reports, SLDS (longitudinal data system)

assessment data, attendance and graduation rate data, discipline reports, class size data, CPI reports, TKES evaluation data, budget printouts, quarterly review data, and stakeholder surveys of students, parents, teachers, paraprofessionals, central office personnel, and community members are used in this stage of annual needs assessment.

Authorized Use of Funds

Title II, Part A funds must be used to supplement, and not supplant, non-federal funds that would otherwise be used for activities authorized under Title II, Part A. It is presumed supplanting has occurred in the following circumstances:

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

ESSER grants do not have the stipulation of supplement not supplant .

Implementing A Successful Plan

The Trion City Board of Education is committed to the establishment and implementation of a comprehensive improvement plan designed to improve educator effectiveness and result in increased student achievement. Funds transferred to Title I are designed to fund the classroom instruction through the use of support staff in Trion Elementary in grades kindergarten and first grade through the use of paraprofessionals.

Professional Development

Professional development is funded through IDEA, Title V, and Title III as well as locally. School principals and district leaders shall be responsible for engaging teachers and other district personnel in on-going professional learning as part of the district's comprehensive improvement plan. Professional learning funds may be expended for the reasons specified in State Board of Education Rule 160-3- 3-.04. Personnel who successfully complete conferences, workshops or courses approved by the professional learning coordinator may be reimbursed for expenditures by submitting such requests in accordance with district procedures established by the Superintendent or designee. The district's multi-year comprehensive improvement plan, budget, and annual report shall be submitted to the Georgia Department of Education at a time and in a

manner identified by the Department. The Superintendent or designee is authorized to establish such administrative procedures or regulations as may be needed to implement this policy.

Professional Development Participation

To attend high quality professional learning related to school and district improvement plans that is not jobembedded, school personnel include approved professional learning to the district professional learning sheet document and/or teachers complete an etrieve approval form (when travel reimbursement is required). Professional learning requests are approved by the principals and the funding director. Professional leave that is not high quality and not included in either the CLIP, SIP, or Professional Learning Plan is not approved. Documentation of high-quality professional learning via workshops, conferences, district/school led professional learning, virtual/online learning, etc. is maintained online on the district's professional leave spreadsheet. Additional documentation may be maintained by the principal. Principals design structures such as time and space for regular PLC meetings to occur, attend PLC meetings, collect agendas, minutes, and sign-in sheets and assure the system that high-quality professional learning is taking place. District directors also attend and provide professional learning during PLC meetings when necessary. PLCs are monitored by principals and they make the district aware of resources needed to help drive high quality activities in the PLCs. The district directors, principal, and/or assistant principal conduct observation sweeps to monitor implementation and discuss a plan of action for individual teachers or total PLC intervention.

Effectiveness of Planned Activities

Planned professional learning activities at the school and district are compared to research to ensure each planned activity is evidenced-based. Schools include documentation of strategies in their school improvement plans. If more documentation is needed, it is completed at the district to ensure all activities are scientifically research based. As school improvement plans and district plans are revised each summer, an evaluation of the effectiveness of the previous year's activities, including professional learning, is completed to determine what activities should be continued, stopped, or revised.

Title IV, Part A- Student Support and Academic Enrichment

The Director of Federal Programs works with the school level administrators to ensure compliance with federal program requirements. At the beginning of every school year, a meeting is conducted by the Director of Federal Programs with the appropriate personnel leading each of the projects funded by Title IV. The focus of the meeting is to discuss:

- CLIP;
- Budget;
- Review of District data;
- On-going consultations with original stakeholders and newly formed collaborations with entities that possess a demonstrated record of success regarding the progress monitoring of activities and programming; and
- Monitoring for federal compliance—specifically—summary of activities and programs provided, the outcome measures achieved demonstrating impact on identified needs, and a description of the data (perception, process or performance) collected to evaluate the effectiveness of funds.

Throughout the year, the Director of Federal Programs monitors expenditures to verify all comply with federal program requirements. In addition to formal meetings, informal meetings, phone calls and e-mails provide additional technical assistance and monitoring feedback. E-mail often serves as calendar reminders for item due dates. If/when facilities need to correct or resubmit an item, either a meeting is held, a phone call is made, or an e-mail is sent describing the issue and how to correct it.

Title V, Part A- Rural Education

The Director of Federal Programs works with the middle and high school level administrators, as funds are designated to these schools, to ensure compliance with federal program requirements. At the beginning of every school year, a meeting is conducted by the Director of Federal Programs with the appropriate personnel leading each of the projects funded by Title V. The focus of the meeting is to discuss:

- CLIP;
- Budget
- Review of District data;
- On-going consultations with original stakeholders and newly formed collaborations with entities that possess a demonstrated record of success regarding the progress monitoring of activities and programming; and
- Monitoring for federal compliance—specifically—summary of activities and programs provided, the outcome measures achieved demonstrating impact on identified needs, and a description of the data (perception, process or performance) collected to evaluate the

effectiveness of funds.

Throughout the year, the Director of Federal Programs monitors expenditures to verify all comply with federal program requirements. Principals complete and maintain Logic Model for all computer based programs. Data is submitted to the Director of Federal Programs by each school principal. In addition to formal meetings, informal meetings, phone calls and e-mails provide additional technical assistance and monitoring feedback. E-mail often serves as calendar reminders for item due dates. If/when facilities need to correct or resubmit an item, either a meeting is held, a phone call is made, or an e-mail is sent describing the issue and how to correct it.

ESSER Grants

The Directors of Federal Programs or designee conducts self-monitoring of schools and programs to ensure compliance with federal program requirements. At the beginning of each school year, a meeting is conducted by the Directors of Federal Programs with all school/district leadership. Throughout the year, the Directors of Federal Programs monitor program expenditures to verify all program expenditures comply with federal program requirements. Principals are encouraged to email and/or call the Director of Federal Programs if concerns occur before the scheduled onsite meetings. All documentation the District may need for future auditing/monitoring is maintained in the District office according to the Cross-Functional Monitoring Document which is issued annually by the GaDOE. Logic Models for all required programs are created and maintained by the school principal.

In addition to formal meetings, informal meetings, phone calls and e-mails provide additional technical assistance and monitoring feedback. E-mail often serves as calendar reminders for item due dates. If/when schools need to correct or resubmit an item, either a meeting is held, a phone call is made, or an e-mail is sent describing the issue and how to correct it.

Grant Monitoring Cycle

The District will undergo monitoring by GaDOE on a five-year cycle. The appropriate grant administrator will participate in training and technical assistance updates as provided by the GaDOE and other sources to maintain proficiency in federal program compliance requirements. Technical assistance will also be provided to the schools. In years when the District does not receive an onsite visit, the appropriate grant administrator will compile documentation per the Cross-Functional Monitoring (CFM) Document. After the Title Programs monitoring process is completed, all required corrective actions are discussed by the Directors of Federal Programs with the Superintendent and other identified administrative staff. The corrections are written and submitted to the state.

Corrective Action through Technical Assistance

Directors of Federal Programs and/or designees identify corrective action through monitoring. Monitoring includes the review of documentation, walkthroughs, meetings, and phone calls. The District or school may be identified for corrective action. The purpose of corrective action is to identify, address, and improve any program operation deficiencies. Grant administrators will discuss the identified issue(s) with the appropriate administrator. Identification of the issue(s) will also be provided in writing along with guidance for compliance and corrective action steps. The administrator will be given a deadline to meet for the corrective action. Based on the issue identified, additional technical assistance and/ or professional learning may be provided to the administrator and/or staff. The Director of Federal Programs will work with the principals of the Title I school and revise budgets as needed to solve problems identified through monitoring the program (including the budget on a monthly basis). If corrective action is needed, documentation is noted in emails and/or written memos. If needed, a corrective action plan is developed including steps and a timeline to

correct the issue.

The applicable Director of the Federal Program will follow-up within 30 days to ensure compliance via visits, phone calls, or emails on the identified issue to ensure that corrective action has been implemented. Documentation that the corrective action has been met is maintained by the grant administrator. If the administrator does not comply with the corrective action plan, the administrator's evaluating supervisor is involved to ensure compliance.

Audit Findings

The Superintendent and/or Financial Director receives the final audit report from the third-party auditor or Georgia Department of Education. If there are findings, the appropriate Director of the Federal Programs is notified and provided with the written document in order to begin the resolution process. Impacted Directors of Federal Programs meet with the Financial Director and/or Curriculum Director to review the finding(s) and develop a resolution plan. The Finance Director collaborates with the Director of Federal Programs to draft and begin the implementation of a resolution plan and obtain the necessary documentation to clear the finding. If the finding cannot be cleared via appropriate documentation, the Finance Director will collaborate and provide guidance to the Director of the Federal Programs in drafting a Corrective Action Plan to implement in order to ensure the finding will not happen again in the future. The Corrective Action Plan is submitted to the Superintendent who may request additional action or approve of the plan. The Director of the Federal Programs, Financial Director, and identified school personnel are charged with ensuring the Corrective Action Plan is implemented and may report periodically to the Superintendent. The Financial Director will provide the Superintendent with a final report of audit findings, which will include the necessary documentation to clear findings or the approved Corrective Action Plan to avoid similar findings in the future. Resolution should occur within 30 to 60 days.

Cross-Functional Monitoring Findings

The Directors of the Federal Programs leading the Cross-Functional Monitoring visit will receive the final Cross-Functional Monitoring report via the Georgia Department of Education (GaDOE) portal, under LEA Monitoring tab, and will notify the Superintendent of the results with a complete listing of all findings, including the indicator, finding, required corrective action, the proposed corrective action plan, required documentation and the person responsible for ensuring completion. This plan for resolving findings will guide the process of resolving findings and provide the basis for timely meetings to assess progress toward resolution. The Directors of Federal Programs will provide regular progress reports to the Superintendent.

The Directors of Federal Programs will upload the required documentation to clear findings to the GaDOE portal as they are developed. Corrective Action Plans, once approved by the Directors of Federal Programs, will be uploaded to the portal. The Directors of Federal Programs will sign off and

request the Superintendent to sign off as well. If the GaDOE requests changes to the Corrective Action Plans or additional information, the Directors of Federal Programs will modify the original list of findings to show the updated information. The Directors of Federal Programs will track progress toward resolution to assure this is completed in a timely manner. All resolutions should occur within 30 to 60 days.

Consolidated LEA Improvement Plan (CLIP)

ESEA: Sec. 1112, 1114, 1115, 1116; Sec. 1003; Sec. 1306; Sec. 1423; Sec. 122; Sec. 3116; Sec. 4106; Sec. 5223; Sec. 5224; Sec. 6223; Sec. 6722; Sec. 9305

Procedures for Creation, Review, and Approval

The Trion City Schools Comprehensive Improvement Plan is updated annually. Designated administrators are responsible for conducting an annual review of the Consolidated LEA Improvement Plan (CLIP) components, at which time revisions are made. Trion City Schools 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 CLIP and all components therein. Directors, system and school leaders, as well as community and parent stakeholders are involved in the revision process. Parents are sent information inviting them to participate via email, telephone, social media, flyers, website, and newsletter. All parents of Trion City Schools are provided multiple opportunities to be involved in the development and revision of the system's CLIP. These opportunities include access to the components of the CLIP during various meetings, at a district-wide parent meeting held in the fall, and at spring school-based Title planning meetings. The district conducts an annual survey which allows parents and community members to provide input on district policies and procedures. A link is available on the district/school websites for all stakeholders to provide feedback. The link is checked every Wednesday by the Family and Parent Engagement Specialist. Documentation includes sign-in sheets, agendas, meetings minutes, emails, and returned plans with comments. The Directors of Federal Programs gather all input and update the CLIP. A CLIP checklist is used to ensure all required components are present. In addition, the GaDOE requires the LEA provide progress monitoring of the CLIP.

To ensure stakeholder input and timely submission to the GaDOE, the following timeline will be followed:

- July through August - The newly approved CLIP is made available on the district website. A link is available on the district/school websites for all stakeholders to provide feedback. The link is checked every Wednesday by the Parent Engagement Specialist and Parent Mentor.
- August through July – The newly approved CLIP is made available to parents in a parent information notebook at the front office of each school. A printed feedback form is provided in each notebook.
- August-October – The current CLIP is made available during a district parent meeting.
- October - November- The current CLIP is shared with parents during the school Title I parent meeting.

- February-April – The current CLIP is made available during school Title I planning meetings and opportunities are provided on paper and online for feedback. Survey responses will be collected as part of the annual Comprehensive Needs Assessment.
- April-June – Changes are made to the CLIP based on feedback obtained from multiple means and stakeholders and data analysis. .
- May-June – The CLIP is uploaded for GaDOE approval.

Resolution for Unapproved CLIP

If the GaDOE requests revisions to any portion of the CLIP , including, but not limited to, CLIP Questions, Family and Parent Engagement Policy, and/or Foster Care Transportation Plan, the Directors of Federal Programs will access the requested changes from the Audit Trail in the SLDS portal. The Directors of Federal Programs will then communicate with the appropriate school or district-based personnel to ensure requested changes are completed. The Directors of Federal Programs will provide technical assistance as appropriate, make corrections and/or approve corrections to the appropriate CLIP components and then resubmit the plan. This process is continued until the plan has been approved by GaDOE.

Selection of Evidence-Based Action Steps in the CLIP

Evidence-based action steps are addressed in the system’s Consolidated LEA Improvement Plan. TCS has adapted the GaDOE’s System of Continuous Improvement and the following improvement planning steps: Examine Progress; Identify Needs; Create Goals and Select Evidence- Based Interventions; Plan Implementation; Implement the Plan. The following information is included as part of creating goals and selecting evidenced based interventions: Schools will create goals and evidence based action steps to address the prioritized overarching areas in need of improvement using a provided schoolwide improvement plan template. Schools must indicate in their improvement plans the extent to which their interventions are evidenced based by selecting Strong, Moderate, Promising, or Rationale and linking to appropriate supporting documentation. Schools are encouraged to focus on three to five goals and approximately three to five high impact action steps per goal that will improve Tier I instruction for all students, as well as identify Tier II-III action steps that will be taken to provide additional support for students, including subgroups, who are not academically successful after Tier I action steps have been implemented.

School Improvement Plans

Creating, Reviewing, and Approving Schoolwide Plans or Targeted Assistance

School Improvement/Schoolwide Plans, SIP, are updated each summer for the following school year. Each school leadership team conducts a meeting at which representatives from each grade level, content area, and department, as well as school administration and parents meet to develop a plan. They proceed through a complete review of school data to determine areas of strength and need and determine the prioritized needs of the school. Using these identified needs, the school leadership team decides on instructional strategies, parental involvement initiatives, and professional development activities to meet the academic needs of the students. Assistance is also provided to schools in their use of school improvement funds to accomplish initiatives in their school improvement and schoolwide plans. System leaders also support schools in developing, revising, implementing, and coordinating school improvement and schoolwide plans during administrative meetings. During the meetings, data is analyzed to identify and develop solutions to challenges related to instructional strategies, Family Engagement, professional learning, and budgets. Additionally, system leaders conduct progress checks to evaluate the extent to which improvement plan goals are being met. Parents are sent information inviting them to participate in the revision process at annual Title I planning meetings held at each school during the spring. Once revisions are made, the plan is placed on the system and each school's website. Paper copies are also available in the office at each school. All plans are reviewed using the School Improvement Plan Checklist.

Selection of Evidence-Based Action Steps

Definition: The term “evidence-based,” when used with respect to a state, local educational agency, or school activity, means an activity, strategy, or intervention that demonstrates a statistically significant effect on improving student outcomes or other relevant outcomes based on:

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

During the planning of the school/district improvement plans, leadership teams identify and record the extent to which the activities, strategies, and/or interventions contained in their school improvement/schoolwide plans meet the various levels of qualifying as being evidence based: strong, moderate, promising, or a rationale if sufficient research can be located to substantiate the use of the program or strategy to impact instruction. If sufficient research cannot be located, a logic model will be developed that includes a rationale for using the program or strategy and what evidence will be collected to determine impact of the program or strategy. This information will be documented in each school improvement plan.

Resolution for Unapproved Schoolwide Plans

Schoolwide improvement plans are maintained in SLDS. This provides access to all district and school level stakeholders and allows for opportunities to collaborate. If the plan needs revision, comments are placed on the plan. Once all comments have been resolved satisfactorily, the plan is accepted by the Federal Program Directors and given to the superintendent for final approval. A School Improvement Plan checklist is used by the Director of Federal Programs while reviewing the SIP.

Schoolwide/ Targeted Assistance Plans

Creating, Reviewing and Approving Schoolwide or Targeted Assistance Plan Procedures

Trion City Schools District does not currently have an identified targeted assistance school. The following procedures will be followed if a school is found eligible for Title I targeted assistance. Should Trion City School District have a school identified as needing Comprehensive or Targeted Support Interventions they will receive the support of the LEA and/or School Improvement Division of the GADOE as appropriate. Parents will be notified of each school's designation status using multiple means of communication.

TCS has established the following procedures to ensure that the School Improvement Plan (SIP) for the District's Title I school is comprehensively developed, reviewed, evaluated and revised on an annual basis with the involvement of parents and other stakeholders.

The identified Title I school follows the Trion City School District Board of Education's Accountability and School Improvement Policy when completing its SIP, which includes Title I SWP. Each year the Director of Federal Programs publishes the timeline and process for completing the SIP. Principals are charged with following the timeline, which includes the review of student achievement and other data by teachers, parents and other stakeholders. The principal leads the effort of revising the SIP with staff, parents, and others in the community. Feedback is provided to principals via technical assistance meetings, phone calls and/or e-mails.

Each school principal is responsible for planning, developing and implementing a comprehensive SIP, which includes specific components such as baseline data, educational goals and objectives of the school, indicators of school and student progress, and strategies and evaluation procedures to measure adequate progress for each goal. SIPs consist of one, two and/or three-year objectives with action steps updated annually.

Late spring (late May or early June), the Title I school revises their SWP with input from all stakeholders including teacher leaders and administrators. In late summer (July), all schools finalize their SIP with input from parents and other stakeholders using the District's CNA. As part of the SIP process in July, principals and their designees have an opportunity to work in small groups with other principals through work sessions to compare data, share ideas about goals and to discuss evidence-based strategies. Further revisions may be made at this point and completed plans are submitted to the Trion City Schools District Board of Education for approval. If issues arise during this process in which the CNA requires additional revision, suggestions are submitted to the Director of Federal Programs for consideration. As the school year progresses and

principals meet regarding the SIP, further revisions are considered and made upon requests and are submitted to the Director of Federal Programs for consideration.

The Director of Federal Programs or designee then reviews the plan using the Schoolwide/Targeted Assistance Plan Checklist and necessary revisions are completed. Schools monitor progress towards goals during the school year and use this data to revise action steps to assure growth toward the goals. This is discussed specifically during a second semester Technical Assistance Meeting. This process is repeated after state standardized tests are administered in the spring.

Throughout the school year, the Director of Federal Programs and other District staff meet with principals and school staff to review the implementation of the SIP and Title I expenditure of funds. During these meetings, district staff provide guidance relative to changes to the plan and/or expenditure of Title I funds, including suggested activities to increase teacher effectiveness, assistance in developing teaching/learning strategies to address the academic needs of students, and planning parent engagement activities. Principals are also encouraged to contact the Director of Federal Programs, or other appropriate district staff, via phone, e-mail or office visit at any time during the year for additional guidance or assistance with the development and monitoring of the SIP.

Approval of the School Improvement/ Schoolwide Plan or Targeted Assistance Plan

The Director of Federal Programs checks all revisions to the plan to ensure all requests from principals are complete. If revisions are needed, the Director of Federal Programs follow-up with the principal via email, phone, or meetings until the revisions are complete. The SIP Checklist is sent to schools in August or September to be signed in coordination with the first Technical Assistance Meeting.

Evidence-based Procedures

During the creation/revision of the CLIP and SIP, the District identifies strengths and needs. From these strengths and needs, evidence-based interventions are selected to meet those needs based on one of the four evidence types.

The district uses the websites that have been developed to assist LEAs in identifying evidence based interventions. The district collects data on all initiatives. If the initiative is not supported by a strong, moderate or promising study, the district develops a logic model for that initiative based on research.

Evidence-based interventions are those which have research evidence supporting their success. Evidence-based means an activity, strategy or intervention that demonstrates a statistically significant effect on improving student outcomes or other relevant outcomes.

ESSA identifies four tiers of evidence-based:

- strong evidence from at least 1 well-designed and well-implemented experimental study;
- moderate evidence from at least 1 well-designed and well-implemented quasi experimental study;
- promising evidence from at least 1 well-designed and well-implemented correlational study with statistical controls for selection bias; or
- demonstrates a rationale based on high-quality research findings or positive evaluation that such activity, strategy or intervention is likely to improve student outcomes or other relevant outcomes; and includes ongoing efforts to examine the effects of such activity, strategy or intervention.

During the annual Title I Schoolwide Plan Workshop, school leadership teams identify and record the extent to which the activities, strategies and/or interventions contained in their school improvement/schoolwide plans meet the various levels of qualifying as being evidence-based (strong, moderate, promising or rationale) for like grade levels contained in the reference using the following websites:

- Evidence for ESSA;
- Best Evidence Encyclopedia;
- Child Trends;
- Results First Clearinghouse Database;
- What Works Clearinghouse; and/or

If information cannot be identified as strong, moderate or promising, a Logic Model Rationale (LMR or Rationale) is developed based on high-quality research findings that are vetted by the program manager or designee. The article must contain information that demonstrates such activity, strategy or intervention is likely to improve student outcomes for students in similar grade levels. The Logic Model Rationales Templates must be started prior to the budget being approved. At the District Level, the same procedures and timeline are followed.

Services to Eligible Private School Children

ESEA: Sec. 1117 and 1120; Sec. 2102(b)(2)(E); Sec.8501(a)(5); Sec. 8501(c); Sec. 4106(e)(2)(B); Sec. 8501(a)(5); Sec. 8501(c); 34 CFR Part 200.62-200.67; 34 CFR Part 200.77 (f)

Notification of Services to Private Schools

Trion City Schools currently does not have participating private schools within or outside the geographic region of the district. The following procedures will be followed if a private school is identified : The LEA is responsible for reaching out to all eligible private schools within or outside of their District and the state (for Title IA) to ensure students in private schools receive equitable services. To ensure the accuracy of school notification, the following procedures will be implemented:

- All DE1111 forms from private schools will be sent to the Superintendent of Trion City Schools District.
 - All completed DE1111 forms will be forwarded to the Federal Programs office.
 - Once received, a spreadsheet of all schools will be created by the Office of Federal Programs to denote which private schools are eligible.
- Eligible private schools are defined as follows:
- For IDEA, in accordance with IDEA regulation § 300.131, the private school must be located in the District's geographical boundaries.
 - For Title I, in accordance with ESEA sections 1117, 1120 and 8501, Title II, Title III, Title IV, and Title V grants, all private schools within the Trion City Schools District and schools outside of the District that have students residing within the Title I attendance area zones.
 - Addresses for private school students listed on the DE1111 form are reviewed to ensure the student resides in Trion City Schools District. Addresses for students that reside outside of Trion City limits are notated with the correct county of residence.
 - Eligible private schools will be notified in a letter of the date and time of the GaDOE Private School informational meetings. This letter will be sent via the ES4PS platform according to the GaDOE timeline. If the private school does not respond on the first attempt, an email will be sent. On the third attempt, a phone call is made. The private school can return its response via the ES4PS platform. Three attempts will be made to notify the eligible private schools.
 - Documentation of non-profit status will be verified.

Private schools are identified by the requirement that they provide the local school district a DE1111 form within the first 30 days of school and for new enrollments/withdrawals. This allows the system to determine the private schools within and outside of the geographic area that has enrolled students for Trion City Schools.

Eligibility for Private School Equitable Services for Federal Programs

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

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

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

For IDEA purposes, each LEA must annually locate, identify, and evaluate all children aged 3-21 with disabilities who are enrolled by their parents in a private school, including non-profit religious, elementary schools and secondary schools located in the district served by the LEA.

Private school students receive their proportional share of services via per-pupil allocation based on poverty students attending a Title I school for Title I, A. All required equitable services amounts (including carryover as appropriate). The private school worksheet is completed by the GaDOE and attached to the consolidated application by the District to ensure all reservations related to parental and family engagement, instruction, professional development and district administrative costs are reserved. The LEA would work closely with eligible participating private schools to verify attendance areas of possible students, establish 501(c) 3 status and determine equitable services.

Initial Consultation

To ensure meaningful consultation occurs, letters for private schools to consult in the participation of federal programs the following calendar year are sent in the fall, usually mid-October by the Director of Federal

Programs. The initial consultation meeting is scheduled and held usually by November to present information about the programs available to students in private schools. District grant administrators lead the meeting and provide each participant with an agenda that covers the required consultation topics. The following documentation is maintained by the District even if no private school representative attends the meeting: agenda, sign-in sheet with roles of attendees, handouts, minutes and Completed Private School Initial Consultation and Notification of Intent in the ES4PS platform. 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 for Title I and IDEA services for private schools. Follow-up consultation meetings are then scheduled with officials from participating private schools.

Ongoing Consultation

For participating private schools with children residing in the District's public school attendance zones that meet the non-profit status requirements, ongoing individualized consultation will occur between district and private school representatives according to the Every Student Succeeds Act Equitable Services Consultation Guide and Handbook located on the GaDOE website. Consultation may include on-site meetings or training, emails, and phone calls.

The consultation will result in the development and implementation of the District's written plan to serve eligible students, teachers and parents in the private school. Ongoing consultation allows for the timely and efficient resolution of any issues that may arise concerning implementation of services.

After each consultation period, public and private school officials indicate in the ES4PS platform whether meaningful consultation occurred with all federal programs, including IDEA. Educational services and other benefits provided under this section for private school children, teachers and other educational personnel shall be equitable in comparison to services and other benefits for public school children, teachers and other educational personnel participating in the program and shall be provided in a timely manner.

Allocation

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

Timeline

- July - June: Ongoing consultation and implementation
- GaDOE issued date: Send invitations through the ES4PS Platform
- October-November:
 - Hold initial consultation meeting for ESSA and IDEA Federal Programs
 - Establish a consultation calendar for all interested private schools
- December: Form B due through the ES4PS Platform
- June: Form A due through the ES4PS Platform

Fiduciary Responsibility

ESEA: Sec. 1118; ESEA: Sec 1114; 34 CFR 300.203; 34 CFR 300.204; 34 CFR 300.205 and IDEA Sec. 300.203 ; IDEA Sec. 300.204

Maintenance of Effort for ESSA and IDEA

GaDOE compares the fiscal effort of the preceding year to the second preceding fiscal year and makes the maintenance of effort (MOE) 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 MOE. Program Directors will pull the MOE information from the Consolidated Application each school year for documentation purposes.

MOE, Maintenance of Equity and Comparability

To determine MOE for IDEA, the Georgia Department of Education compares the fiscal effort of the preceding year to the second preceding fiscal year and makes the MOE determination available to the system through a rating of “met” or “unmet” on the consolidated application. To calculate each local educational agency’s MOE, the Georgia Department of Education uses the following process:

- The GaDOE test aggregate expenditures of state and local funds to determine if the MOE standard is met. If GaDOE determines the LEA has met MOE based on aggregate expenditures of state and local funds, no further calculations are required.
- If the LEA does not meet MOE based on aggregate expenditures of state and local funds, the LEA may test combined state and local funds per FTE using the GaDOE prescribed worksheet.

MOE for the Individual with Disabilities Education Act (IDEA) is calculated through other means.

Failure to Meet MOE

In the event that the LEA fails to meet the MOE, the State Education Agency (SEA) will contact the LEA, requesting the LEA write an appeal letter. With the LEA’s request, the SEA will make an appeal to the U.S. Department of Education on behalf of the LEA (and other LEAs within the state of Georgia). The LEA must

then await a response from the U.S. Department of Education. If the waiver request is denied, the SEA will inform the LEA of a required reduction to its current year allocation. If the response is favorable, the LEA will be allowed to retain 100% of its current allocation. Documentation to support this process is maintained on file by both the LEA and SEA.

IDEA requires TCS to use/expend (using state and local funds) at least as much as they did in the comparison year on the education of students with disabilities. There are two standards for MOE:

1. Eligibility: Must budget and project at least as much as expended in the comparison year.
2. Compliance: Must actually expend at least as much as they spent in the previous comparison year.

The Student Support Services Director works with the Financial Director to review the MOE projections annually to review the budget and Special Education expenditures/coding is accurately reported. Projected expenditures based on activities/changes via meetings take place at least quarterly during the school year. If TCS has been determined not to have met MOE using the GaDOE's calculations in the Consolidated Application, a review of exceptions and/or aMOE adjustment will be completed. If MOE is still not met, then TCS will repay funds.

IDEA MOE Exceptions

Allowable Exceptions (§300.204 (a – d)):

- Voluntary Departure of Personnel;
- Decrease in the Enrollment of Students with Disabilities;
- Termination of the Obligation of the High-Cost Student; and/or
- Termination of Costly Expenditures from Long Term Purchases
- Assumption of Cost by the High-Cost Fund.

Exceptions to MOE will be reported to the GaDOE via the Exception to the MOE form.

- Exceptions form must be submitted and approved;
 - Supporting evidence must show true expenditures and must be approved by the GaDOE's Budget Liaison; and

- All documentation must be uploaded in the Consolidated Application.

IDEA MOE Adjustment (§300.205):

- If the IDEA allocation increases, the LEA, if it meets certain conditions, may reduce its MOE level up to 50 percent of the increase in the allocation via the GaDOE MOE Adjustment form.

IDEA Excess Cost

The IDEA Excess Cost is a grant statute that provides federal funding for the education of children with disabilities and requires, as a condition for the receipt of such funds, that states agree to provide a free appropriate public education (FAPE; i.e., specially designed instruction provided at no cost to the parents that meets the needs of a child with a disability) to every eligible child. TCS ensures that IDEA funds support the excess cost of educating students with disabilities.

IDEA funds must be used only to pay the excess costs of providing special education and related services for children with disabilities. Excess costs must be used to supplement state, local, and other federal funds and not to supplant those funds.

Excess costs are those costs for the education of an elementary school or secondary school student with a disability that are in excess of the average annual per-student expenditure in an LEA during the preceding school year for an elementary school or secondary school student, as may be appropriate. TCS must spend at least the average annual per-student expenditure on the education of an elementary school or secondary school child with a disability before funds under Part B of the Act are used to pay the excess costs of providing special education and related services.

To accurately determine the district is spending the average annual per-pupil expenditure (APPE), the Finance Director completes the special education Excess Cost Base Calculations in the GaDOE Portal by the appropriate deadline set by the GaDOE. The Finance Director determines elementary and secondary expenditures separately. Central Office costs must be attributed to elementary and secondary costs.

ESSER grants do not have the stipulation of supplement not supplant .

RAM/P

Resource Allocation and Management Plan (RAM/P)

Trion City Schools is a public Strategic Waiver School System in Georgia pursuant to O.C.G.A. §20-2-81. As a SWSS, the district and its schools have developed a five-year strategic plan for improving the performance of its schools. The local board has proposed a contract reflecting its strategic plan for each of its schools including components for flexibility, accountability, and consequences as contemplated by state law. In exchange for this flexibility and waiver, the district intends to demonstrate high academic achievement and student performance.

The Trion City School System currently has one elementary school, one middle school, one high school, thus no RAM/P is required.

Assessment Security

ESEA: Sec. 1111; Sec.1111(B)(2)(G)(i)

Assessment/Accountability Security and Reporting

In compliance with federal and state regulations, the Trion City Schools District administers a secure, standardized assessment program. This ensures that accountability information based on this assessment program is one of quality and integrity. The District has procedures in place for monitoring and improving the ongoing quality of its assessment and accountability system. Written procedures are in place for the distribution and return of secure test materials, as well as for addressing test security breaches, including what constitutes a violation and potential consequences of those actions. Assessment security procedures are reviewed annually with School Test Coordinators, who are designated by appointment from the System Testing Coordinator. The School Test Coordinators are expected to redeliver this information to all employees who will be involved in testing at the school level. Additionally, School Test Coordinators are expected to maintain documentation of this training, including content, attendance, date(s) and time(s). All District employees complete training on the Georgia Code of Ethics for Educators on an annual basis. Standard 10 of this Code addresses the fair and ethical administration of state-mandated assessments.

District Level Assessment Plan for All District/Statewide Testing

The annually published Student Assessment Handbook and the Standardized Testing Administration Protocol Manual are available electronically on the Georgia Department of Education Website. These documents are shared with all School Test Coordinators at the initial district wide test coordinator training each year. It is the expectation that these documents are annually reviewed by School Test Coordinators and all personnel who are involved with student assessment. All personnel who will be involved with testing as the role of School Test Coordinator are required to attest by signature their understanding of these expectations, including the ethical guidelines. School Test Coordinators are encouraged to collect the same documentation from any school-level staff involved with standardized District/State mandated assessment.

The Georgia Department of Education Student Assessment Handbook outlines the responsibilities of each person involved in testing by role. The expectations are reviewed annually as part of the Fall School Test Coordinator Training previously described. A district-wide testing calendar is developed each year by the System Testing Coordinator and the leadership committee following the guidelines established by the State. This calendar is published on the Trion City Schools District/School webpage. This calendar is also

distributed internally to all schools. All testing windows adhere to published State testing schedules and guidelines. All schools/personnel are expected to adhere to the published testing calendar dates.

The annually published Accessibility and Accommodations Manual, available electronically on the Georgia Department of Education Website, outlines the policies and procedures for providing student accessibility to the current assessment systems. This includes accessibility features available to all students and allowable accommodations for special populations. These updates are shared annually with School Test Coordinators, as well as with district leadership team members who provide oversight to programs for Students with Disabilities (IEP/504) and/or English Learner students. Testing accommodations are reviewed annually (at a minimum) in IEP/TPC/504 plans to create a testing plan that allows students to participate in a testing program that fairly and accurately measures student outcomes, while also adhering to prescribed accommodation protocols.

All secure test materials and paper score reports are delivered to a secure testing location at each school. Materials scheduled for delivery to each school requires a signature of receipt from the School Testing Coordinator and/or Principal. School Test Coordinators and Principals are alerted to delivery dates and receive, in advance, a packing list of materials to expect. Assessment materials are stored in a secure testing location at each school. School Test Coordinators are directed to inventory materials immediately upon receipt, report any errors to the System Testing Coordinator and store these materials in a secure, locked area that has limited access to others. At the conclusion of testing, materials are immediately returned to the secure location. School Test Coordinators and principals are notified regarding dates and times for pick-up. If testing materials are not ready for pickup at the scheduled time, the School Test Coordinator must securely transport the materials themselves to the System Testing Coordinator by the end of the day. Once materials are returned to the secure testing location, they are re-inventoried, and discrepancies are resolved with school level personnel. All test materials, including secure test tickets, are returned to the System Testing Coordinator Office and appropriate materials are stored to be shredded at a later date, announced by the State Department of Education.

Accountability Reporting

Each year, the System Testing Coordinator/ High School Counselor reports Districtwide performance on the ACT, SAT, AP and Georgia Milestones assessments on the District webpage. Additionally, reports are provided about District Performance on the Georgia College and Career Ready Performance Index Scores (CCRPI), High School Graduation Rates, and School Climate Scores. Finally, each school provides a link to the GOSA School Report Card in the School Improvement Plan section of the individual school's webpage.

English Learner (EL) ACCESS Participation Rate (ELP)

The System Testing Coordinator monitors the ELP participation rate. If needed, the System Testing Coordinator works collaboratively with the Director of Federal Programs to collect the justification reasons if the percentage falls below 95%.

Internal Controls

Code of Federal Regulations

The Trion City School System operates their federal grants in accordance with the Code of Federal Regulations.

Cost Principles

Allowability of Costs (CFR 200.302(b)(7)); 2 CFR Sec 200.403.

Any purchases made with federal funds must follow the guidelines for allowable costs. Trion City School System Office of Finance along with Federal Programs will follow guidelines as detailed in EDGAR, Code of Federal Regulations (CFR), and applicable memos, emails, letters, handbooks, and/or communication regarding allowable/unallowable purchases provided by the Georgia Department of Education. The appropriate program director will direct any questionable expense to the GaDOE Area Program Specialist for that program for further clarification.

Federal funds cannot be used to purchase incentives for students, teachers, or to entice participation in professional learning activities. Food for Family Engagement activities must be considered “light refreshments.”

Financial Management ~ Process to Review Expenditures to Determine Allowability

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

1. Each budget is reviewed by the Federal Program Directors to ensure alignment to system (CLIP) and school improvement plans (SIPs), revised as necessary, and approved by the program directors. Once the system or school makes the necessary changes and the budget is submitted to the GaDOE, each department or school completes a requisition(s).
2. Requisitions must include:
 - a. Complete vendor information including phone number (and fax number, if applicable) or attached contact information
 - b. Ship to information including the address for the delivery location
 - c. Appropriate account number assigned by the Federal Program Director based on the budget sheets

- d. Sufficient detail to determine if each cost item is allocable, reasonable, and necessary.
 - e. If a requisition is under \$4999, no quotes must be obtained.. If a requisition is between \$5,000 and \$9,999, one quote must be obtained and attached to the requisition.
 - f. If the requisition is over \$10,000 and up to \$250,000 two or more quotes must be obtained..
 - g. If the requisition is over \$250,000 the requisition, bids must be solicited from adequate number of known qualified sources, requires public advertising, and all must be approved by the Board of Education.
3. Supplement not Supplant as indicted in the Federal Programs handbook. ESSER grants do not have this stipulation.
 4. Adhere to period of performance (27 months)
 5. No purchase or contract shall be divided into parts for the purpose of avoiding the above requirements.
 6. The Federal Program Directors review the requisition to assure that the purchase is included in the Schoolwide/School Improvement Plan and that the expense is allocable, allowable, reasonable, and necessary.
 7. If approved, the Federal Program Director then signs off on the requisition which forwards the requisition to the Finance Director and Superintendent for approval.
 8. If approved, requisitions are then issued a purchase order by the administrative assistant and the order is then placed.
 9. If rejected, the requisition is returned with reasoning. It can then be corrected and sent back through the process again or filed as unpurchased.
 10. When the ordered item arrives, the school or department compares what is received with what was ordered and acknowledges receipt of the item or items. Any disputes are reconciled between the Federal Program Directors and the vendor.

ESSER grants do not have this stipulation.

Allowability Procedures

Any purchases made with federal funds must follow guidelines for allowable costs, must be necessary, reasonable, and allocable, and should be determined as allowable throughout the grant development, budget, and purchase. Trion City Schools federal programs will follow guidelines detailed in 2 CFR 200.420-200.475. Federally funded purchases will adhere to needs as described in the CLIP and school improvement plans, and will be incurred during the approved budget period (fiscal year of the budget) and adhere to the

period of performance. During school and budget planning, all questionable expenses will be directed to the Georgia Department of Education Area Program Specialists for further clarification. Title funds cannot be used to purchase incentives for students, teachers, or to entice participation in professional learning activities. Title I, Part C funds can be used to provide meals when parent trainings occur during meal times and can be used to provide transportation for parents to and from Title I, Part C funded events.

Reasonable and Necessary Use of Funds

Comprehensive and school improvement plans are used to determine and establish appropriate coordination and use of federal funds. All grant development and budget processes are connected to these plans that use system and school data to establish necessity. In addition, when considering a purchase with federal funds, ask:

1. Do I really need this?
2. Do I need to spend these funds to meet the purposes and needs of the program?
3. Do I have the capacity to use what I am purchasing?
4. Did I pay a fair rate and can I prove it?
5. Would I be comfortable defending this purchase?
6. Is the proposed cost consistent with the underlying needs of the program?

When required by state guidelines, a Resource Allocation Methodology Plan (RAMP) will be created. A RAMP is an individualized and a locally developed document that explains how an LEA plans to equitably allocate its state and local funds to operate all the schools in the district. For practicality, only expenditures that directly affect instructional practices in a school will be included. Currently, Trion City Schools is not required to complete a RAMP; however, discussions related to the topic are conducted with district and school administrators.

Capital Expense Funds

When federal funds are budgeted and expended under object code 700 (capital expense), Trion City Schools ensures all required documentation is submitted and approved and purchases will be added to the district's inventory. In the event of a single item costing \$5,000 or more, a preapproval request will be submitted to the Georgia Department of Education.

Procurement, Technical Evaluation, and Selection Procedures

The Trion City Board of Education follows policies and procedures for the purchase of items for Trion City Schools. All purchases made with federal dollars shall be pursuant to the policies of the Trion Board of Education, the laws of the State of Georgia, and align with the 2 CFR 200.320 procurement guidelines. All local purchasing procedures will be followed. Contracts are not made with debarred contractors. When contracts (purchase orders) are expected to aggregately equal or exceed \$25,000 across federal programs, the programs' directors must ensure vendor allowability prior to making the purchase. To ensure potential vendors have not been suspended or debarred, one of three means will be used:

- The System for Award Management (SAM) – <http://www.sam.gov/portal/SAM/#1> website – Evidence of the verification will include the search query that is date and time stamped.
- Certification Regarding Debarment, Suspension, and Other Responsibility Matters Primary Covered Transactions form (SBA Form 1623), or
- Statement included on purchase orders: By accepting this purchase order, you certify good status with the US Department of Labor and have not been suspended or debarred. The documentation for ensuring vendor allowability is attached to the purchase requisition and/or is on file.

Trion Board of Education requires a purchase order or request for check payments for all consultants, purchased services, and purchases. In the case of purchases, the purchase order serves as the contract between the district and vendor. Contracts are required for all outside consultants and purchased services. Agreements are entered between Trion City Schools and the consultant. Each contract should contain the following:

- specific duties (specifically spelled out for each contract),
- the scope of work,
- cost (not to exceed the agreed upon amount),
- beginning and ending dates/timeframe,
- method of payment,
- where services are to be provided, and

- signatures.

The director of federal programs approves all Title I, Part A; Title I, Part C; Title II, Part A; Title III, Part A; Title IV, Part A; Title V, Part B; ESSER, and ARP contracts. The director of student support services approves all IDEA contracts. If the consultant is working with students, they must have a criminal background check. Each contract is signed by the program's director to provide oversight in ensuring all federal programs contractors complete the work. Artifacts including sign in sheets, proof of workshop completion, invoices, and contracts are reviewed prior to issuance of payment of services. All contracts, source documents, and proof of fulfillment of contractual obligations are kept on file. Furthermore, the district, to the greatest extent practicable, must provide a preference for the purchase of goods and materials produced in the United States (2 CFR 200.322).

Conflict of Interest

As described in the policy no employee, officer, or agent may participate in the selection, award, or administration of a contract supported by federal funds if he or she has a real or apparent conflict of interest.

Conflict of Interest Statement

Trion City Schools ensures that employees, officers, or agents are not allowed to engage in the selection, award, and administration of a contract supported by a federal award if he or she has a real or apparent conflict of interest.

Definition: Such a conflict of interest would arise when the employee, officer, or agent, any member of his or her immediate family, his or her partner, or an organization which employs or is about to employ any of the parties indicated herein, has a financial or other interest in or a tangible personal benefit from a firm considered for a contract. No employee, officer or agent may participate in selection, award, or administration of a contract supported by a federal award if he/she has a real or apparent conflict of interest.

Invoices

The following procedures are followed for invoices:

- Receipt of Invoice: Invoices are received by the administrative assistant.

- As stated above, the school/department will match the order as he or she receives it with the purchase order and acknowledges receipt of the item or items and sends it to the administrative assistant. The purchase order cannot be paid unless the item is received in the system.
- The administrative assistant compares vendor invoices to purchase orders. If these items match, the invoice is entered as an account payable. If not, the administrative assistant alerts the Federal Program Directors who work together to determine a solution.

Payment of Invoice

The following procedures are followed for payment of invoices:

- The administrative assistant charges the expenditures to the proper fund/program designated on the purchase order by the Federal Program Directors in the system financial software, PC Genesis.
- If invoices received that are charged to a federal program exceed the amount of purchase orders, the administrative assistant alerts the appropriate Federal Program Directors who works to determine a solution.
- Disbursement is not made until the invoice is validated as owned by the district and received by the system by receiving individuals.
- Open purchase order reports are noted on monthly expenditure reports provided to the appropriate Federal Programs Directors or upon request to determine if goods or services have in fact been received but not invoiced by the vendor. Contact is made with the vendor to secure an invoice if such instances are noted.

Segregation of Duties

(GAO-14-704G Standards for Internal Controls for the Federal Government 10.03;10.12-10.14; 2 CFR 200.303(a))

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

Finance Director

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

- Prepare monthly and annual financial statements for inspection by the Board of Education.
- Establish accounting procedures to ensure that proper internal controls are maintained for the district business office
- Manage cash flow and investment of available funds.
- Assist the Superintendent in preparation of financial data for the tax digest, state allotments, and other financial areas.
- Open all bank accounts and reviews prior to reconciliation. Approves reconciliations of other staff members.
- Oversee the reconciliation of all accounts.
- Supervise operation of the finance office to include payables and payroll.
- Compile annual budget for board approval and submit to the Georgia Department of Education.
- Coordinate accounting procedures to ensure that central office and local school administrators follow proper procedures in the budgeting, record keeping, and expending of program funds for which they are responsible.
- Oversee, approve and post monthly and year-end adjustments, run and balance reports.
- Oversee and assist with the preparation and submission of year end and interim financial reports to the Georgia Department of Education.
- Manage funds for SPLOST, Capital Projects, and Debt Service.
- Ensures a yearly audit is completed and submitted to the Department of Audits and Accounts.
- Compile data for audit, work with state auditors during audit, and prepare MD&A for audit report.
- Assist in the implementation of accounting procedures by maintaining accurate records and internal controls throughout the system and ensuring compliance with all applicable regulatory requirements.
- Perform journal entries, budget adjustments, and bank reconciliations.
- Close books at month and year end.
- Compile data for audit, work with state auditors during audit,
- Perform payroll accruals and reversals.
- Oversees internal audits.
- Assist with any duties required for annual audit preparation.
- Complete 1099's.
- Request federal and state grant reimbursements.
- Submit annual completion reports on all federal and state grants.
- Process receipts.
- Record school lunchroom deposits.
- Compile data for audit and work with state auditors during audit.
- Provide quarterly expenditure reports to directors of federal programs

- Collaborate with directors of federal programs to monitor monthly expenditures using general ledger reports from google sheets to ensure federal programs and ESSER grant expenditures are in alignment with the approved budget and the amounts meet and do not exceed the grant award
- Collaborate and obtain approval from directors of federal programs prior to drawdowns
- Ensure drawdowns are based on actual expenditures and minimize the time between the transfer of funds.
- Perform other duties as assigned by the Superintendent.

Human Resource Director

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

- Process monthly payroll and reporting for all system employees.
- Invoice for any payroll reimbursements.
- Prepare year-end reporting, including W-2's.
- Calculate sick leave for retirement.
- Assist with budget preparation.
- Calculate salary adjustments
- Records Management
- Oversees verification of employment
- Prepare quarterly tax reporting.
- Compile data for audit, work with state auditors during audit
- Oversee employee benefits
- Complete CPI report
- Oversee employee continuing education through professional development standards (PSC)
- Ensure employees are hired within their field of service (certification)

Administrative Assistant

- Prepare invoices
- Place all orders for purchases for each school and system
- Maintain of purchases
- Pay invoices as they become due
- Enter vendors into the accounting software
- Ensure proper fund and object source for expenditures

- Compile data for audit
- Collaborate and assist with state auditors during audit process

Directors of Federal Programs

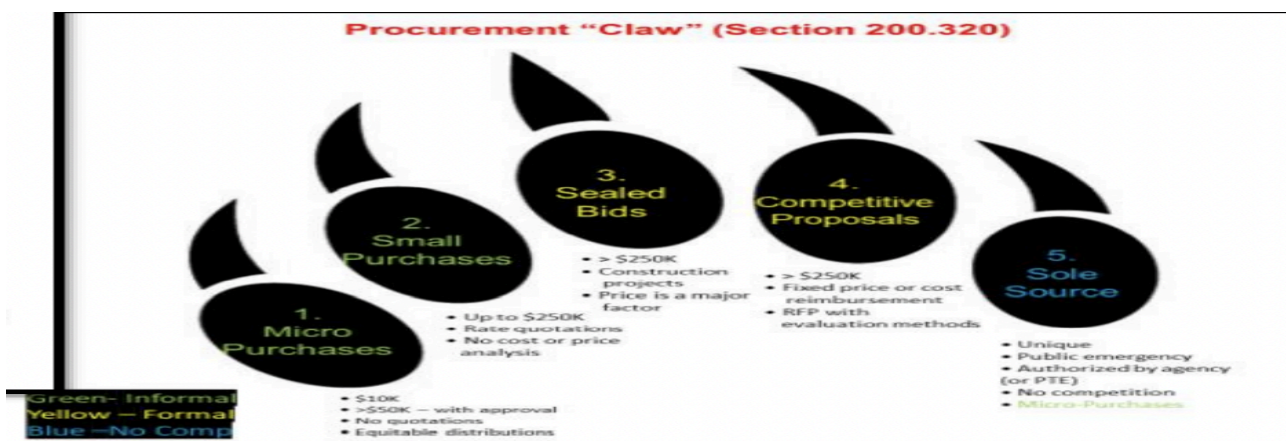
Under the direction of the Superintendent, the Federal Program Directors will carry out the following duties:

- Coordinate, monitor, and provide technical assistance to schools for federal programs
- Monitor all purchases to ensure that expenditures are allocable, reasonable, and necessary. Ensuring all system policies for purchasing, expending funds, and inventorying equipment are followed to avoid fraud, waste, abuse, and corruption. No items will be purchased without prior approval, and all items purchased must be a part of the approved budget.
- Approve each purchase requisition/order, travel expense statement and professional learning (PL) leave that is funded through federal funds. Meet with the administrative assistant, Human Resource Director, and Finance Director as needed and request financial reports to ensure alignment and balance. . Meet with and/or email principals or designees to ensure accuracy of school budgets.
- Ensure inventory of purchases made with federal funds for the system and school are maintained electronically and kept up to date.
- Ensure designee (Director of Technology, principals, and parent mentor) based on location and item type complete the physical inventory check at each facility at least once every two years. Purchase Orders are pulled from object codes 615 and 616 to verify if each item is included in each school's and the central office's inventory which is shared on Google Drive.
- Ensure that each school principal is provided with proper training and documents to share with their employees regarding fraud and the channels to report it if suspected annually.
- Maintains accurate records and internal controls ensuring compliance with all applicable regulatory requirements and accuracy of fund balances (object codes).
- Assists the administrative assistant with processing purchase requisitions, verifying available funds for accounts charged to system accounts, and payment of invoices.
- Reviews financial information for potential budget variances and ensures fund balances are accurate.
- Maintains a wide variety of financial records to ensure compliance and the availability of documentation.
- Reviews purchase requisitions, travel expense statements, and registration payments for compliance and accuracy.
- Manages the Consolidated Application budgets.

- Assists auditors by providing supporting documentation and/or information on internal processes (including financial documents, professional learning documentation, equipment inventory, and all Cross Functional Monitoring documents as provide by the GaDOE) for all federal programs

Procurement

CFR 200.319(c): (200.317 through §200.327); 2CFR Sec 200.318(a).



Procurement Claw (2 CFR 200.317-326)

General procurement standards are identified in 2 C.F.R 200.318 and require a non-Federal entity to use its own documented procurement procedures which reflect State and local laws and regulations and to maintain oversight to ensure that contractors perform in accordance with terms, conditions, and specifications of their contracts or purchase orders. TCS has established policies to address these requirements and requires all Federal programs to comply with the policies.

This helps ensure that all reasonable expenses are acquired at the best possible price and also ensures that local, smaller businesses are able to engage in the procurement process which allows for a full and open competition as required by 2 C.F.R. 200.319(a).

Micro and Small Purchases

Micro-purchases may be awarded without soliciting competitive quotations if the price is considered to be reasonable based on research, experience, purchase history other information and documents it files accordingly. It is the responsibility of the district to determine and document an appropriate micro-purchase

threshold based on internal controls, an evaluation of risk, and its documented procurement procedures. The district has the option to establish a lower threshold or may self-certify a higher threshold if considered low-risk from the most recent audit. The micro purchase amount for Trion City Schools is \$10,000. To the extent practicable, the district must distribute micro-purchases equitably among qualified suppliers. The district must also take into consideration the price as to its reasonableness based on research, experience, and purchase history. Micro-purchases, \$0 - \$10,000, shall be made with effort to provide the least expense to the District. Purchases shall be based on one or more oral or written quotations, when possible, to determine best price. Services, supplies or equipment estimated to costing \$10,000 up to \$250,000 will require a minimum of two written quotes or website references. Evidence of all quotes is the responsibility of the person creating the requisition and must be attached to the purchase order/requisition in the financial software program. All services, supplies or equipment estimated to cost greater than \$250,000 must use a bid or request for proposal and will be posted on the District website and the Georgia Procurement website. Evidence of the Bid or RFP must be attached to the purchase order/requisition in the financial software program. If purchases are made through RESA, compliance with the above procedures is not required.

Small purchase procedures (§200.320) are those relatively simple and informal procurement methods for securing services, supplies, or other property that do not cost more than the simplified acquisition threshold (§200.88) of \$250,000.00. The district has the option to establish a lower threshold. If small purchase procedures are used, price or rate quotations must be obtained from at two qualified sources. It is the responsibility of the person creating the purchase requisition to ensure price or rate quotes for small purchases are obtained, attached to the purchase requisition at the time it is created, and are on file.

Competitive proposals or bids twenty-five thousand dollars (\$25,000) or greater shall be approved by the Board of Education. Competitive proposals or bids ten thousand dollars (\$10,000) or greater shall be approved by the Board of Education if the low bid is not recommended. Purchases between \$10,000 and \$250,000 shall be reported to the Board at its next meeting. In compliance with Section 2 CFR 200.319, any purchases more than \$250,000 including contract modifications will require a cost or price analysis, sealed bids, and/or competitive proposals. Cost analysis means evaluating the separate cost elements that make up the total price, including profit. Price analysis generally means evaluating the total price.

Competitive Sealed Bids and Competitive Proposals

Trion City Schools adheres to the following procurement guidelines for competitive sealed bids (formal advertising) for purchases greater than \$250,000.00. The bids are publicly solicited, and a firm fixed price contract (lump sum or unit price) is awarded to the responsible bidder whose bid, conforming with all the material terms and conditions of the invitation for bids, is the lowest in price (§200.329(b)). Additional information about competitive sealed bids is located in the Georgia Department of Education Federal

Programs handbook. The technique of competitive proposals is normally conducted with more than one source submitting an offer, and either a fixed price or cost-reimbursement type contract is awarded. It is generally used when conditions are not appropriate for the use of sealed bids. If this method is used, the following requirements apply:

1. Requests for proposals must be publicized and identify all evaluation factors and their relative importance. Any response to publicized requests for proposals must be considered to the maximum extent practical;
2. Proposals must be solicited from an adequate number of qualified offerors;
3. The non-federal entity must have a written method for conducting technical evaluations of the proposals received and making selections;
4. Contracts must be awarded to the responsible offeror whose proposal is most advantageous to the program, with price and other factors considered; and
5. The non-federal entity may use competitive proposal procedures for qualifications-based procurement of architectural/engineering (A/E) professional services whereby offerors' qualifications are evaluated, and the most qualified offeror is selected, subject to negotiation of fair and reasonable compensation. The method, where price is not used as a selection factor, can only be used in procurement of A/E professional services. It cannot be used to purchase other types of services though A/E firms that are a potential source to perform the proposed effort.

Noncompetitive Proposals

Procurement by noncompetitive proposals is procurement through solicitation of a proposal from only one source (sole source) and may be used only when one or more of the following circumstances apply:

1. The acquisition of property or services, the aggregate dollar amount of which does not exceed the micropurchase threshold;
2. The item is available only from a single source;
3. The public exigency or emergency for the requirement will not permit a delay resulting from publicizing competitive solicitation;
4. The federal awarding agency or pass-through entity expressly authorizes a noncompetitive proposal in response to a written request from the non-federal entity; or
5. After solicitation of a number of sources, competition is determined inadequate

No purchase or contract shall be divided into parts for the purpose of avoiding the competitive bid process. The aggregate dollar amount can not exceed the micro-purchase threshold.

The Finance Director and/or Superintendent checks Georgia's System for Award Management (SAM) website, <https://www.sam.gov/portal/SAM/##11> prior to approving any purchase equal to or more than

\$25,000 to ensure the vendor is not on the list of suspension and debarment. To ensure potential vendors have not been suspended or debarred, one of three means will be used:

- The System for Award Management (SAM) – <http://www.sam.gov/> portal/SAM/#1 website – Evidence of the verification will include the search query that is date and time stamped.
- Certification Regarding Debarment, Suspension, and Other Responsibility Matters Primary Covered Transactions form (SBA Form 1623), or
- Statement included on purchase orders: By accepting this purchase order, you certify good status with the US Department of Labor and have not been suspended or debarred.

The resulting documentation ensuring vendor allowability is attached to purchase order/requisition and/or is on file.

Completing Cost/Price

Analysis In compliance with Section 2 CFR 200.319, any purchases more than \$250,000, including contract modifications, will require a cost or price analysis, sealed bids, and/or competitive proposals. Cost analysis means evaluating the separate cost elements that make up the total price, including profit. Price analysis generally means evaluating the total price.

Gathering Independent Estimates

For expenses over \$250,000, the district will request independent estimates of the goods and services being procured before receiving bids or proposals to get an estimate of how the goods and services are valued in the current market. To accomplish this, quotes are solicited, then based on results, bids and proposals are sought. Prior to awarding a contract or if a contract is modified, the district will conduct either a price analysis or cost analysis, depending on the type of contract, in connection with every procurement with federal funds in excess of \$250,000.

Verification of Services Provided/Delivered

Payment for any item delivered pursuant to an order may be withheld by Trion City Schools until all requirements of the contract or order have been complied in full. Consultant services will be paid and invoiced after services are rendered.

Record Maintenance of Procurement

It is the responsibility of the programs' directors to determine which method of procurement to use to contract for the purchase or acquisition of supplies, materials, equipment and services, ensuring all contract actions follow applicable local, state, and federal laws and regulations. The formal contract/agreement is determined by the commodity purchased. Each formal solicitation for expenditures over \$250,000 is evaluated and scored by a committee of experts using a pre-established rubric to determine the contractor selection or rejection. For expenditures under \$250,000, the programs' directors will retain quotes in compliance with local, state, and federal guidelines. All solicitation records, supporting documents, award letters and contracts are kept on file and maintained for seven years from the date of award. All federal grant financial records, supporting documents, statistical records and all other non-federal entity records pertinent to a federal award are retained for at least five years from the date of the final expenditure report. The following internal controls have been created and designed to provide reasonable assurance regarding the achievement of objectives in the reliability of reporting for internal and external use. Copies of completion reports for the previous fiscal year will be kept on file in the finance department. Accounting records to support the results of outlays (expenditures indicated in the completion report) will be kept on file in the finance department. Copies of expenditure (cumulative) reports for the respective month for total expenditures reported to Georgia Department of Education will be kept on file with the programs' directors. Grant administrators will examine budget summary and detailed expenditure reports for their respective budgets. Completion reports are annual reports required by the Georgia Department of Education for all grant funds. Reports are due thirty days after the end date for each grant. Prior to preparing the completion report, the general ledger report for each grant will be reviewed to ensure that all expenditure postings are correctly recorded. General ledger reports will be generated for each grant by function and object codes. The finance department completes these steps in the system financial software:

- The finance director will run an account activity summary report in the system financial software for all related expenses for the grant (July through September of current year for grants ending on September 30th or previous July through June for grants ending June 30th).
- The finance director will send the summary report to the programs' directors for sign-off.
 - The finance director completes the final review and submits the completion reports to the Georgia Department of Education.

Multiple Year Contracts

Multiple year contracts should include the opt-out clause to clearly state “if federal funds are no longer available the contract will be void”.

Technical Evaluations of Competitive Proposals and Selecting Recipients (CFR 200.320(d)(3))

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

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

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

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

Conflict of Interest (CFR 200.318(c)(1))

Definition of Conflict of Interest

District employees shall not engage in unethical behavior or compromising practices in relationships, actions and communications with present or potential suppliers, contractors or subcontractors. Further, District employees shall avoid the intent or appearance of unethical behavior or compromising practices in relationships, actions and communications with present and potential suppliers, contractors or subcontractors.

Standards of Conduct: Employees of the Trion City School System who are engaged in the selection, award and administration of contracts shall abide by the following:

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

Chain of Command for Reporting Potential Conflicts of Interest

Anyone who becomes aware of a potential conflict of interest related to the use of federal funds should report their suspicion to their immediate supervisor. If at the school level, it should be reported to the principal. The principal should report the suspected conflict of interest to the superintendent.

Officers, employees, and agents of Trion City Schools may neither solicit nor accept gratuities, favors, or anything of monetary value from contractors to parties to subcontracts. Nominal value is defined as an item having a value of under \$25.00, such as a vendor paid lunch.

The Conflict of Interest procedure is disseminated to all employees through the district's Federal Programs handbook. It is the responsibility of each individual acting on behalf of Trion City Schools to consider whether there may be an actual conflict of interest or the appearance of a conflict of interest in any transaction or proceeding they participate in. If there is not an actual conflict of interest, but there are circumstances that would create the appearance of a conflict of interest, it is the responsibility of the individual acting for the school system in a transaction or proceeding to ensure that those circumstances are disclosed. Any such disclosures should be made promptly when an appearance of a conflict of interest is recognized.

Employees shall certify that:

1. they indicate through school sign in they have been directed to the handbook for the reading and understand of procedures;
2. to their knowledge they have not participated in any transactions or proceedings where there is an actual conflict of interest;
3. they have disclosed in accordance with this procedure the circumstances regarding any transactions or proceedings where they are aware that there may be the appearance of a conflict of interest.

When any appearance of a conflict of interest comes into existence after employees have made this certification, they are required to follow the disclosure steps in the administrative regulation that go with this procedure.

Best Practices for Avoiding Conflicts of Interest

The following best practices will be used to avoid conflicts of interest:

- Ensuring that all purchases follow the guidelines outlined in this document.
- Checking with supervisors when in doubt if a conflict of interest may occur.

Board Member Conflict of Interest, Policy BHA

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

The following will be used to avoid conflict of interest by board of education members:

Financial Governance

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

of value shall not include the items contained in subparagraphs (a)(2)(A) through (a)(2)(J) of Code Section 16-10-2.

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

11. No local board may do business with a bank or financial institution where a Board member is an employee, stockholder, Directors, or officer when such member owns 30% or more stock in that institution.
12. No Board member may have a financial interest in school buses, bus equipment or supplies, provide services for buses owned by the Board, or sell gasoline to the Board from a corporation in which the Board member is a shareholder.
13. No Board member shall accept a monetary fee or honorarium in excess of \$101.00 for a speaking engagement, participation in a seminar, discussion panel, or other activity which directly relates to the official duties of that public officer or the office of that public officer. Actual and reasonable expenses for food, beverages, travel, lodging, and registration for a meeting which are provided to permit participation in a panel or speaking engagement at the meeting shall not be monetary fees or honoraria.

Conduct as A Board Member

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

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

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

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

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

Personal Compensation

2 CFR Sec. 200.430(a)(1); SBOE 160-3-3-.04.

Consultants, Contracts, Purchased Services

Trion City Schools currently utilizes Federal Program funds and/or ESSER grant funds for consultants, contracts and/or purchased services. The guidelines listed below are followed:

- Contracts are required for all contactors, consultants and purchased services. Agreements are entered into between Trion City Schools and the contractor, consultant and/or service provider.
- Contracts are required for all contactors, consultants and purchased services. Agreements are entered
- Contracts are generated by Federal Programs Director and/or Human Resources Director
- Specific duties, timeframe, method of payment, location signature, and dates are 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.
- Multi-year contract will include the opt out clause to clearly state if federal funds are no longer available the contract will become null and void.
- Personal can receive bonuses for compensation from Federal Programs and ESSER grants.

Each contract is signed by the following: Contractor, consultant, or service provider and Federal Programs specialist. The Federal Programs specialist provides oversight in ensuring that all contractors' work is complete. Artifacts, daily sign in sheets, and completion of timelog are kept on file at the central office with payroll documentation. The Federal Programs specialist signs off on all invoices/contracts prior to the issuing payment for services. These contracts must be maintained and kept in the Federal Programs office.

Federal Programs Directors work with the administrative assistant, Human Resource Director and/or Finance Director to ensure compliance and accuracy. Each program director ensures that contracts are fulfilled, budgeted correctly, and that services were provided in accordance with the purchased services contract.

Time and Effort

Charges to a federal fund for salaries and wages must be based on records that accurately reflect the work performed by all employees whose salaries or other compensation are paid in whole or in part with federal funds, not to exceed 100%. A time sheet must be maintained by any employee who provides supplemental instruction outside of school hours. Time and Effort are based upon the work performed, not how the employee is paid. The appropriate Federal Program Director will ensure that an annual certification or personnel activity report will be maintained for all employees paid with federal funds as indicated on assigned roles and responsibilities in relation to funding source.

Periodic Certification

An annual periodic certification will be maintained for any employee who worked on one federal grant or one cost objective (job). These certifications will be completed after-the-fact and must account for the total activity performed. The certification will be completed at the end of June (or on the last contracted day of the school year for employees who do not work year-round) and will be completed on one form per work site. The forms are signed, collected, and kept on file by the Finance Director in conjunction with the appropriate federal fund grant.

Personnel Activity Report (PAR)

A PAR will be maintained for any employee who receives salary or compensation through federal grants and works on more than one cost objective (job). Split-funded personnel paid with federal funds are required to maintain a log/schedule and must reflect the individual's total work time and identify the portion of time spent on the federal project. An individual who serves different student populations needs to complete a monthly activity log/ and or daily schedule, after the work has been completed. The log/schedule must be signed after the fact by the employee and/or the supervisory official having firsthand knowledge of the work performed by the employee. The log must be supported with documentation of actual effort, not estimates. Supporting documentation could be a work calendar, work product, time log, or class schedule. The employee and/or supervisory official who signs off on the log must have supporting documentation for the time reported. The time log is signed off by the supervisor and employee after the completion of the work. The documentation is submitted to the supervisor quarterly. The logs are shared among the employee, his or

her supervising administrator, and the appropriate Federal Program Director. All logs are submitted to the supervisor quarterly, as detailed in the LEA's procedures. Additionally, the directors will work with the employee to complete reconciliation (no more than 10% variance) and appropriate adjustments will be made prior to the end of the school year.

Stipends (GA 160-3-3-.04)

Stipends will be paid to certified and support personnel for having successfully completed previously approved professional learning opportunities at any time during the fiscal year outside of the employee's normal contract hours at the agreed upon rate. The Trion City School System does not pay stipends for work on an award for performance. Any stipends awarded must be reasonable and necessary to the federal program.

Stipends will only be awarded if the following conditions exist:

- There is evidence that the knowledge, skills, practices, and dispositions gained from the professional learning activity are aligned to an approved individual plan, or a school or LEA initiative and/or product, and/or specific goals; and
- There is evidence that the knowledge, skills, practices, and dispositions developed through participation in or facilitation of professional learning have been implemented/ demonstrated in the classroom/work setting; and
- Participation occurs beyond regular contract hours, days, or school year.

State and federal funds designated for professional learning shall not be used to pay stipends to school board members or to school council members who are not employees of the LEA. The appropriate Federal Program Director will maintain the appropriate paperwork to ensure employees are adequately compensated.

Educators completing preapproved self-paced workshops and afterschool conferences and trainings shall receive a stipend based on their hourly rate.. New teacher mentors shall receive other compensation at the following rate: the teacher mentor is responsible for source documentation related to the mentoring experience and receives a stipend based on the completion of hours indicated within the mentor/mentee program.. Pre Approved endorsement completers may receive a stipend up to \$500.00 per courser within each endorsement.

Substitutes for Teachers and/or Paraprofessionals

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

Job Descriptions

Job descriptions have been developed, maintained, and provided to the GaDOE for approval for all positions paid with federal funding.

Leave Policy

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

Accrual of Sick Leave and Absence for Medical and Related Reasons

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

20-2-1110 must be forfeited if the driver withdraws from service for twenty-four (24) or more consecutive months.

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

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

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

Family and Medical Leave Act (FMLA)

See board Policy GBRIG.

Unpaid Medical Leave

This benefit is provided to employees who:

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

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

Any benefits-eligible employee who meets the above criteria may request unpaid medical leave. Unpaid medical leave may be granted for a period of time up to one hundred and thirty (130) scheduled work days or

until the end of the school year, whichever occurs first, and shall be inclusive of any previously used FMLA, sick or other TCSS leave by the employee.

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

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

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

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

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

Personal and Professional Leave

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

No grant of approval for an absence permitted under this section shall be conditioned upon disclosure of the specific purpose for which such absence is sought, nor shall any such grant of approval be withheld or denied

because of the failure or refusal of personnel to disclose the specific purpose for which such an absence is sought; provided, however, that personnel may be requested to state whether the absence is sought under the category of "personal" or "professional" absence.

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

Observance of Religious Holidays

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

Jury and Witness Leave

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

Military Leave

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

to the extent possible in scheduling such leave so as to minimize the disruption in those employees' duties and the mission of the Board of Education.

Bereavement Leave

In the event of a death in the immediate family of an employee, up to three (3) days of sick leave per death will be granted. Bereavement leave will be charged against the employee's accumulated sick leave. Employees may use personal leave for absence due to death of individuals other than immediate family members upon approval of the Superintendent or designee. If the employee desires to take bereavement leave more than the days allowed for personal leave, the employee may request to take vacation leave or unpaid leave. For the purposes of bereavement leave, members of the immediate family are defined as spouse, children, parents, siblings, in-law equivalents of the same, grandparents, grandchildren or relatives living in the employee's household.

Disclaimer

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

Travel Policy (CFR 200.474; 200.475; OCGA §50-5B; OCGA §20-2-167(b); SBOE 160-5-2-.23; Financial management for GA LUAs Chapter 40)

Costs incurred by employees and officers for travel, including costs of lodging, other subsistence, and incidental expenses, must follow the Georgia Statewide Travel Policy set by the State Accounting Office, as well as the school system's written reimbursement policies. Costs must also be considered reasonable and otherwise allowable only to the extent such costs do not exceed charges normally allowed by the Trion City School System in its regular operations as the result of the school system's written travel policy. In addition, if these costs are charged directly to a federally funded source, documentation must justify that:

- Participation of the individual is necessary to the federal award; and
- The costs are reasonable and consistent with non-federal entities' established travel policy or follow GSA 48 CFR 31.205-46a.

- Travel authorizations, pre-approval, agendas, and travel reimbursement forms must be maintained at the central office and accompany the travel expense form request and must be accounted for prior to reimbursement check by administrative assistant
- A conference is necessary for the project by inclusion of an agenda.

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

- Principals and directors of federal programs approve the professional development requests. Federal Program Directors must pre-approve any applicable federally funded PL before payment will be allowed.
- A travel expense form must be completed in its entirety to receive reimbursement for expenses.
- Employees are responsible for ensuring that expenses claimed in the travel expense report are proper, accurate, and incurred for official business. A traveler who knowingly presents a false or fraudulent claim may be subject to penalties under criminal statutes.
- Employee completes and sends the “Travel Expense Statement” to the administrator for approval. The Federal Program Director verifies the information on the form and once deemed accurate, it is signed off on by the Finance Director, who in turns sends the request to the administrative assistant who enters the information into the system financial software. Failure to request reimbursement within 45 days of travel may result in a loss of or reduction of funds.
- Purpose of the trip must be included on the expense report.
- Attendees are responsible for maintaining and providing upon request information related to registration and dues and fees to include agenda, sessions attended, and proof of attendance.

Transportation

Mileage must be documented on a “Travel Expense Statement” form. From the State Travel Regulations,

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

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

Employees traveling by personal vehicles and requesting reimbursement must record the actual odometer readings on the expense statement. Parking fees and tolls paid may be reimbursed and employees are

expected to obtain receipts for these expenses. If it is not possible to obtain a receipt, a written explanation should be included on the expense statement.

Lodging

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

- Lodging must be documented on a “Travel Expense Statement” form.
- Employees are responsible for making their own reservations and guaranteeing them.
- Employees are responsible for submitting a copy of the tax exemption form for state and local hotel/motel excise taxes if staying at a hotel in Georgia. Any tax paid, must have an explanation of why it was not waived, for example, paid with personal credit card, state does not allow or \$5 State Hotel Motel Fee, no exemption allowed.
- Employees must travel more than 50 miles.
- Employees should use the least expensive rates for lodging. Employees should ask for the “State Employee Rate” for the appropriate amount allotted unless the hotel is a conference fee venue. Any rate above this requires written authorization prior to the trip.
- Expenses must be broken down by date. Receipts are required.
- Any out-of-state travel must first receive the superintendent’s approval.

Subsistence

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

- For meal reimbursement Trion City Schools Systems adheres to the StateWide Travel per diem guidelines.
- Travelers traveling within the State of Georgia are eligible for up to \$50.00 of per diem to cover the cost of three (3) meals per day. Incidentals are not included in the per diem rate. The per diem rate applies to all cities in Georgia. Per Diem Allowance are set forth by the Statewide Travel Policy and will follow the “Standard” GSA per diem rates, based on approval from SAO/OPB.
- Breakfast = \$13.00 Lunch = \$14.00 Dinner = \$23.00 4.4 Meal Per Diem
- During OVERNIGHT Travel Travelers traveling overnight, either in-state or out-of-state, are eligible for 75% of the total per diem rate on the first and last day of travel. For example, if the per diem rate allows a \$50 total reimbursement, \$37.50 would be allowable on a travel departure or return day ($\$50 \times .75 = \37.50) As a result, the time of departure and time of return are not considerations for calculating the Meal Per Diem when associated with overnight travel.

- When meals are provided to a Traveler in conjunction with out-of-state travel events on a travel departure or return day, the meals per diem reimbursement rate is reduced by the amount of the provided meal(s) after the 75% proration. For example, if the per diem allows a \$50 total reimbursement, and lunch was provided at no cost on a travel departure or return day, the total allowable reimbursement for that day would be \$23.50 [$\$50 \times .75 = \37.50 less \$14 lunch = \$23.50].
- The per diem allowance for Georgia is \$50. Out-of-State per diem allowances follow the GSA rates.
- For trips involving multiple travel destinations, base the reduction on the per diem rate in effect where the night was spent, as follows:
 - • Departure Day: Where the Traveler spends that night. • Return Day: Where the Traveler spent the night before returning to their Residence or Primary WorkStation.

Expense Reimbursement

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

- Employees must submit expense reports within 45 calendar days of completion of travel.
- The Trion City School System requires that hotel receipts and parking receipts accompany the expense report for verification and for future audit needs.
- Travel expense reports may be selected for audit at any time and all required receipts must be retained by the traveler for three years after the travel date which were attached to the expense report.
- All source documentation must be included.

Additional Compensation Procedures

Other Salaries and Compensation

Additional compensation are considered salaries associated with job codes and duties not classified elsewhere. It is requested work that is performed during off contract time.

Pre-Approval Process for Professional Learning

The principal of each school submits the pre-approved professional learning request form a minimum of two weeks in advance of the activity date through the use of an established Google Sheet. The form is approved/denied by the Director for Curriculum and Instruction.

The Director for Curriculum and Instruction sends an approval email, (A shareable spreadsheet is created from this survey by the Director of Curriculum and Instruction.)

All travel expenses must be pre approved. Travel may be reimbursed for pre-approved professional learning activities (PDARF) that align with the CLIP and SIP, and SWP . The appropriate Federal Program Manager must approve the professional learning activity prior to the activity. Travel costs include transportation/mileage, lodging, subsistence, and related travel costs (e.g., parking). Travel costs must be reasonable and consistent with written reimbursement/travel policy/or follow GSA 48 CFR 31.205-46a. All employees must complete the Travel Expense Statement on the provided Google form located on the school/district website. When the state reimbursement rate conflicts with the approved or requested rate, the employee may place additional travel information on the response form for written justification. In the event that a state rate is not used, a conference rate or rate based on limited availability at the time of booking, or a rate due to safety concerns may be used for pre-approval. Mileage allowance is the state of Georgia rate of mileage from work location to workshop/conference and return. This rate is subject to change.

Travel Cancellations

Trip cancellation may come in the form of conference cancellation, inability of traveler to complete the travel and/or unavailability of a substitute traveler. Every effort to maintain the travel plans for the benefit of the district/school should be made.

If travel is canceled for any reason after the airline ticket, hotel, and/or registration fees have been purchased, the traveler must contact the grant administrator immediately. Non-refundable travel costs/service(s) to TCS may be reimbursed by the traveler.

If travel is canceled by the employee for personal reasons which are not approved, any non-refundable cost may be requested to be repaid by the employee to TCS. A Travel Expense Report form with attachments to the respective federal program department will be provided by the employee.

Suspension & Debarment

(34 CFR 85.110; 2 CFR 180.220; 2 CFR 200.237 Appendix II Section H; and WHEO 12549 and 12689)

Each Federal Program Directors and/or department head must check the System for Award Management (SAM) website, prior to approving any contract or subcontract expected to equal or exceed \$25,000 to ensure the vendor is not on the list of suspension and debarment. All purchases made with federal dollars shall be pursuant to the policies of the State of Georgia, and align with the 2 CFR 200.320 procurement guidelines. All local purchasing procedures will be followed. Contracts are not made with debarred contractors. When contracts (purchase orders) are expected to aggregately equal or exceed \$25,000 across federal programs, the programs' directors must ensure vendor allowability prior to making the purchase. To ensure potential vendors have not been suspended or debarred, one of three means will be used:

- The System for Award Management (SAM) – <http://www.sam.gov/portal/SAM/#1> website – Evidence of the verification will include the search query that is date and time stamped.
- Certification Regarding Debarment, Suspension, and Other Responsibility Matters Primary Covered Transactions form (SBA Form 1623), or
- Statement included on purchase orders: By accepting this purchase order, you certify good status with the US Department of Labor and have not been suspended or debarred.

The documentation for ensuring vendor allowability is attached to the purchase requisition and/or is on file. Our district cannot and does not purchase from any vendor or contracted person/company identified on the website as being suspended or debarred. Evidence of the verification will be in the form of a search result screenshot printed, signed, dated, scanned, and attached to the requisition/purchase order.

Transferability of Funds

Trion City Schools has the flexibility to transfer Title II, Part A and Title IV, Part A funds. During the current school year, Trion City Schools will transfer 100% of its Title II, Part A and 100% of its Title IV, Part A funds to Title I. The district indicated the transferability option in the CLIP. The district will drawdown funds (DE0147) from Title IV, Part A, then Title II, Part A, and lastly Title I, Part A. Funds transferred from Title

IV, Part A and Title II, Part A should be indicated on the completion report with function and object codes 5000 930. This is an annual decision during the CLIP process. The actual expenditures for both Title I and Title II or Title IV (the transferred-in amount) will be reported on the Title I completion report by function and object. Since the transfer-in amount was combined with the Title I itemized budget, the expenditures for both programs will be reported on Title I.

Transferability of funds between Federal Programs under the ESEA and SEAs allows LEAs to transfer funds received by formula under certain programs to other programs to better address State and local needs. Transferability provides LEAs with unprecedented flexibility in targeting federal resources to meet the needs of all children. The Trion City School System does exercise this flexibility. The system transfers Title II, Part A and Title IV funds into Title I and follows all federal and state guidelines related to transferability. It can be a powerful tool in assisting the district in pursuing their own strategies for raising student achievement. It facilitates the development and implementation of integrated approaches for addressing local educational needs and priorities. Trion City Schools may not transfer funds it receives under any other ESEA program. Trion City Schools may select to transfer all or a portion of funds it receives under Title IIA and Title IVA((ESEA Sect. 5103 (b)(2)). Excluding Title I, Part D and Title V, Part B, each program covered by the transferability authority is subject to the equitable services requirements under Title I or VIII, which may not be waived. (ESEA section 8401(c)(5).) All funds transferred by Trion City Schools are subject to equitable services requirements; it must engage in timely and meaningful consultation with appropriate private school officials. (ESEA section 5103(e)(2).) With respect to the transferred funds, Trion City Schools must provide private school students, when applicable, and teachers equitable services under the program(s) to which, and from which, the funds are transferred, based on the total amount of funds available to each program after the Payroll

Directors of Federal Program work with the Human Resources and Finance Director to ensure payroll reports are accurate. The Title I director in collaboration with the finance director reviewing expenditure reports to determine appropriate code of expenditures for Title I, when needed. Drawdown for the sending program is completed in DE0147 for that program while Title I drawdowns are completed in the DE0147 for Title I. The actual expenditures for both Title I and Title II or Title IV which includes the transferred in amount, will be reported on the Title I completion report by function and object codes. Since the transfer-in amount is combined with Title I itemized budget, the expenditures for both programs will be reported on Title I. In addition, each program director ensures that the number of federally funded employees is consistent with the approved application. Monthly payroll reports, expenditure summary and detail reports, and substitute reports will be used to ensure that each object code is accurate.

Hazard Pay

Employees may receive hazard pay for a nation or local emergency or to perform critical services. Instances when this might happen may include a pandemic or natural disaster. Employees will be compensated for fully completing an object from a supervisor related to the conditions.

Inventory Internal Controls

Equipment Management

(CFR 200.313(d); 2 CFR200.439)

An inventory of tangible personal property having a useful life of more than one year will be maintained at the system and/or school level. This includes all items purchased under state object codes 615 (expendable equipment) and 616 (expendable computer equipment).

Acquisition of Equipment

All newly acquired equipment must support initiatives in the district and/or a school's improvement plan. Procurement procedures as outlined in this document must be followed to obtain equipment.

Method of Entering Information into the LEA's Inventory Management System

Inventories will be maintained by designated individuals at each site on a spreadsheet hosted on Google Drive that at minimum includes the following: description of property, serial number or other identification number, funding source, FAIN number (on grant award), acquisition date, purchase price, location of asset, use, current condition, disposal date, sale price of property. Equipment must be entered within 30 days of equipment being received.

All equipment purchased is monitored by the Director of Technology and school-level administration or their designee(s). All equipment purchased by schools must be properly labeled with an identification number and documented on the inventory sheet on Google Drive. The Director of Federal Programs will have access to the Google Sheet in Google Drive at all time for review of compliance.

Off-site Use of Equipment

Every precaution must be taken to ensure that equipment used off-site by personnel and students is used for academic purposes and that the equipment is returned at the end of use free of damage and in good working order. Detailed records must be maintained on the equipment, its location, to whom it is checked out, and when it is returned.

Physical Inventory

District-level physical inventory: The Director of Technology appropriate Federal Program Director will complete a physical inventory check at each facility at least once every two years. Purchase orders will be pulled from object codes 615, 616 to verify each item having a useful life of more than one year is included in the inventory, is located as assigned, and is being used for the intended purpose. The appropriate Federal Program Director of each funding source will collaborate with each principal, Director of Technology and school level inventory contact(s) to the inventory monitoring check has been completed.

Equipment Disposition

The following guidelines must be followed:

Once a piece of equipment that was purchased with federal funds is no longer being used or capable of being used for its originally intended purpose, it can be designated as surplus. Once designated as surplus, the item can be used for a different purpose outside of federal funds guidelines. School-based representatives must request approval from both the principal and the appropriate program directors before items are designated as surplus so that a consensus is reached that the original purpose or intent has been met. An email is sufficient to achieve this.

- Items that are no longer usable will be disposed of.
- Equipment costing <\$5,000 at the time of purchase and more than three years old can be retained, sold, or disposed of, with no obligation to GaDOE. Equipment costing \$5,000 or more at the time of purchase may be retained or sold with the awarding agency (GaDOE) having rights to the state's share at \$500 or 10 percent of sales.
- A disposition form must be completed by the site inventory contact for any item that is declared surplus because it has met its originally intended purpose or because it is no longer usable. Disposition forms can be obtained from the appropriate Federal Program Director.

- The date of disposition must be entered on the inventory sheet on Google Drive.
- Once a disposition form has been completed and the disposition date has been entered onto the inventory form, the item can be repurposed or disposed of. However, the item must remain on the inventory sheet for five years from the date of disposition before it can be removed from the inventory spreadsheet.

Safeguards Related to Loss, Damage, or Theft of Equipment

Every effort must be made to prevent loss, damage, or theft of equipment. The first strategy to safeguard equipment is to maintain an up to date inventory. In addition, all items must have an inventory/asset tag or other labeling approved by the appropriate Federal Program Director. An physical inventory will be completed at least once every two years by the Director of Technology and/or school designee and shared with the appropriate Federal Program Director.

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

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

Safeguarding Funds, Property, and Assets from Unauthorized Use or Disposition

Materials purchased for use in federal programs will be properly labeled and utilized in the capacity for which it was purchased. Any equipment, materials and/or supplies purchased with federal funds are considered solely for the use of that program until such time the equipment is no longer needed to meet the original purpose for which it was purchased. Proper procedures must be followed before equipment disposal.

Equipment Use for Title IA Target Assistance

Trion City Schools currently does not have an identified Title IA Target Assistance school. If a Title IA Target Assistance school is identified the following procedures would be followed: The identified school equipment must facilitate the purchases through the school system. The same internal controls will be followed to create requisitions and inventory and maintain equipment. If equipment is designated for student

use, it can only be used by eligible students as determined through a mutual agreement between the LEA and private school within federal program guidelines. The equipment could not be utilized by non-Title I students. The Director of Technology will work cooperatively with the identified Title IA Targeted Assistance school to ensure equipment is properly maintained and is safeguarded from theft, damage, loss, and abuse.

Equipment Use for Private Schools

Trion City Schools currently does not have participating private schools within the geographic region. If a private school were to be established the following procedures would be followed: Private schools requesting equipment must facilitate the purchases through the school system. The same internal controls will be followed to create requisitions and inventory and maintain equipment. If equipment is designated for student use, it can only be used by eligible students as determined through a mutual agreement between the LEA and private school within federal program guidelines. The appropriate Federal Program Directors will work cooperatively with private school officials to ensure equipment is properly maintained and is safeguarded from theft, damage, loss, and abuse.

Maintenance Procedures to Keep Property in Good Condition

The Director of Technology along with assistance from the building level administrator ensures that equipment is maintained on an inventory Google Sheet within Google Drive as outlined in this document. Additionally, each Federal Program Director works cooperatively with the system's Technology Department to ensure that equipment is properly maintained to ensure longevity. Accurate records will be maintained about the current condition of equipment purchased with federal funds by the designee. When equipment is not functioning, members of the Technology Department are responsible for making necessary repairs or service and reporting the services to the appropriate Federal Program Director.

Process for Disseminating Inventory Procedures

The Director of Technology is responsible for ensuring that principals and teachers are knowledgeable about allowable procedures for the use of federal program equipment and established procedures for maintaining an accurate inventory of equipment. These procedures will be shared annually during an administrative meeting. In addition, the Federal Programs Handbook, containing these procedures, will be shared with all personnel.

Cash Management Internal Controls Procedures

Cash Management (*CFR 200.302(b)(6)(4)*) (*CFR 200.305*) & Drawdown of Funds (*CFR 200.305(b)(3)*)

Funds are drawn down based on actual program expenditures. It is the responsibility of the appropriate Federal Program Directors and the Finance Director to work cooperatively to review all expenditures monthly after budget approval before funds are drawn down from GAORS. Moreover, the following practices are observed:

- Directors for each federal program must reconcile their respective budgets monthly to ensure that all expenditures charged to their program are allowable.
- The Finance Director will perform periodic reviews of the general ledger, including federal accounts and fund sources.
- The Finance Director runs a monthly expenditure report out of the financial software. The Federal Programs Director reconciles the account and returns a copy to the Finance Director that is signed, verifying the accuracy of the report.
- Funds are drawn down after reconciliation on actual expenditures and on a reimbursement basis only.
- The Finance Director provides the Federal Programs Director with a copy of the DE1047, documenting the monthly drawdown.
- There is no cash involved as all drawdowns are directly deposited into the system's bank account.
- Federal Program Directors ensure that equipment/supplies are purchased and received during the period of performance of the grant award.
- The school system does not request advance payments for federal fund disbursements, only reimbursements.
- All reporting documentation is kept in the system's central office and is available for review upon request.

Requisition Process

Upon budget approval, requisitions are submitted by the designee and forwarded to the Federal Programs Director for approval. Requisitions are then approved by the Director of Finance and/or Superintendent. The approved requisition is forwarded to the Central Office administrative assistant to initiate purchase. Goods are received at the school or other location and receiver checks to make sure the order is correct and

complete. When the invoice is received at the central office from the vendor, accounts payable matches the invoice to the PO and obtains approval of payment from originator and Director of Finance. After approval is obtained, the amount is entered into the accounting software as a claim. Checks are processed for mailing. A check register is produced by our accounting software and signed off by the Director of Finance and/or Superintendent for each check run and kept on file in accounts payable. A copy of each check is attached to PO and invoice and filed in accounts payable office. Checks are then mailed.

Draw Down of All Federal Funds and ESSER Grants (2CFR 200.414)

The Finance Director will draw down funds in a timely manner. Drawdowns are always requested for funds expended in the previous month(s). Drawdowns are submitted in collaboration with Director of Finance and the Director of Federal Programs and signed off by the Director of Finance. The Finance Director will provide the Federal Programs Director with a copy of the DE 0147. A financial report is provided to the local Board of Education monthly for each federal program and local budgets which includes monthly expenditures, revenues, and equity. This process will occur more frequently when spending warrants it and collaboration and approval is required.

Trion City Schools use the indirect cost calculation, chart of accounts, and Grants Accounting Online Reporting Systems (GAOPS) provided by GADOE to plan, budget, expend, and draw funds. School and district level budgets are also built based upon the required set aside and amounts for neglected students, private school participation, homeless, parent involvement, professional learning for professionally qualified teachers, and the other general provisions as required (public choice and supplemental services).

At year end reconciliation for GAORS grants, a report is printed from the accounting software Federal Program Directors reviews and acknowledges that the completion report may be entered. After data is entered, the reports are given to the Finance Director for review and approval, who then submits it to the GADOE. The original is kept on file in the system's central office and a copy is made for the Federal Program Directors' file for monitoring.

Consultants, Contracts, Purchased Services for Federal Funds

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

- Contracts are generated by appropriate Federal Program Directors.
- Specific duties are specifically spelled out for each contract.

- The person must also submit to be fingerprinted if they are working with students.
- If the contract is with a TRS retiree, the individual must be approved yearly through the HR Department prior to beginning services.
- The contract includes the number of hours to work and the rate of pay.

Each contract is signed by the following: contractor, principal (if school-based), and the appropriate Federal Program Directors. The Federal Program Directors provide oversight in ensuring that all contractors' work is complete and that sub-recipient requests have been evaluated before funds are released for reimbursement. Artifacts, daily sign in sheets, and completion of all workshops are kept on file by the appropriate Federal Program Directors. The appropriate Federal Program Directors signs off on all invoices/contracts prior to the issuance of payment for services. These contracts must be maintained and kept by the appropriate Federal Program Directors.

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

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

- Purchases may extend beyond one year to take advantage of cost reductions, IF the students, teachers, and school leaders in the current fiscal year receive benefit from the purchase.
- Leases and licenses – All instructional software subscriptions must be purchased prior to January, if a year subscription. .
- Professional Learning registration – To maximize cost efficiency, the LEA may take advantage of “early bird” professional development registration where early registration occurs in the original grant period and the actual professional development occurs in the carryover period.
- Supporting documentation will be kept on file.
- Every effort should be made to align all purchases to the original grant period as much as possible.

Grant Development and Budget Process

Each federal fund program director prepares a yearly budget showing the distributions of funds.. Federal Program Directors ensure that all funds budgeted are allowable per funding source. The budget is forwarded to the GaDOE for approval of budgets within the Consolidated Application. The Finance Director enters the budget into the system financial software using the Consolidated Application budget as the source.

Supplement Not Supplant

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

- Equitable distribution of non-Federal funds requires that a schoolwide program shall use Title I funds only to supplement the amount of funds that would, in the absence of the Title I funds, be available from non-Federal sources for the school, including funds needed to provide services that are required by law for students with disabilities and English Learners.
- Supplemental activities are determined by the Trion City School System such that non-federal funds are distributed to all schools across the district in equitable ways. Furthermore, per pupil allocation by grade band will be used to equitably distribute Title I funds.

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

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

ESSER grants do not have the stipulation of supplement not supplant .

Transferability

LEAs are provided the opportunity to transfer funds under Every Student Succeeds Act. The Trion City School System does exercise this flexibility. The system transfers Title II, Part A and Title IV funds into Title I and follows all federal and state guidelines related to transferability.

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

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

Copies of completion reports for the previous fiscal year will be kept on file in the Finance Department. Accounting records to support the results of outlays (expenditures indicated in the completion report)will be kept on file at the Central Office. Copies of expenditure (cumulative through) reports for the respective quarter for total expenditures reported to GaDOE will be kept on file in the Finance Department. Federal Program Directors will examine budget summary and detailed expenditure reports for their respective budgets.

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

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

The Finance Director completes these steps in the system financial software:

1. The Finance Director will run an account activity summary report in the system financial software for all related expenses for the grant (July thru September of current year for grants ending on September 30th or previous July thru June for grants ending on June 30th).
2. The Finance Director will send the summary to Federal Program Directors for sign-off.

Monitoring and Reporting Program Performance (CFR 200.328)

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

Steps to Audit/ Monitoring Resolutions:

Once the audit/ Cross-Functional Monitoring report is received, the appropriate Federal Program Directors will review all items. The Cross-Functional Monitoring report will be retrieved from the GaDOE website under the Consolidated Application and/or from the Superintendent.

- Each item will be examined carefully, and a team of system-level staff will determine the best means of corrective action.
- Items are gathered, and a report is written by the appropriate Federal Program Directors and/or Finance 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.

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

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

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

Capital Expense Funds (CFR 200.439)

The Trion City School System does use federal funds to budget items under object code 700 (capital expense) with discretion.

Ethics and Fraud, Waste, Abuse, and Corruption

The Federal Programs Directors reviews ethics and fraud, waste, abuse, and corruption policies as it relates to Title programs, including Title I, Part A (Disadvantaged Children), Title I, Part C (Migrant Education Program), Title I, Part D (Neglected and Delinquent), Title II, Part A (Teacher and Leader Quality), Title III (English Learners and Immigrant Students)), Title IV, Part A (Student Support and Academic Enrichment),

Title X, Part C (McKinney-Vento Education for Homeless), ESSER, and Individuals with Disabilities Education Act (IDEA), with all staff members at the annual back to school. An agenda and sign in sheet will be kept to document this has been completed.

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

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

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

Purpose: to ensure the reporting of suspicion of fraudulent activity, the Trion City 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: Trion City Schools thoroughly and expeditiously investigates and reports 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 Trion City School System Superintendent, Director of Federal Programs, or Director of Student Support Services at 706-734-2086.
2. Any employee with the Trion City 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 Trion City 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.

(TCSS BOE Policy DIE)

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

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

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

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

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

Written Method of Conducting Technical Evaluations of Competitive Proposals and Selecting Recipients

2 CFR 200.320(d)(3); 200.318(d)(e)(f); 200.319

Micro Purchases, Small Purchases, Competitive Sealed Bids and Request for Proposals

TCS follows all state and local requirements when purchasing items and conforms to all federal laws. Items are purchased in strict adherence to the competitive solicitation process utilizing TCS's Expenditure Level Thresholds as follows:

- Purchases (unit price cost) less than or equal to \$500.00 and not already on an existing contract may be accomplished without multiple quotes. Purchasers should use their best judgment when making the purchase.
- Purchases (unit price cost) from \$501.00 to \$999.99 and not already on an existing contract may be made at the local school/District is recommended to provide one oral or written quote are obtained and maintained at the school/District, reviewed/approved by the principal/District at least monthly and available for periodic audit. The date of receipt should be kept on file for all items ordered.
- Purchases (unit price cost) from \$1,000.00 to \$10,000.00 and not already on an existing contract may be made at the local school/District level provided minimum of one quotes are obtained and maintained at the school/District, reviewed/approved by the principal/District at least monthly and available for periodic audit. The date of receipt should be kept on file for all items ordered.
- Purchases of \$10,000 to \$250,000.00 and not already on an existing contract require a formal solicitation (unless there is an exception to the full and open competition), either an IFB (Invitation for Bid) or RFP (Request for Proposal). Procurement Services will issue the IFB/RFP and make every attempt to solicit at least two responsive and responsible offers.

Competitive Sealed Bids

Sealed Bids may be used to solicit offers for goods or services when price is the primary deciding factor for award. When sealed bidding is required, an Invitation for Bid (IFB) will be posted on the Procurement Services website, posted on the Georgia Procurement Registry, and notification sent to all or a portion of prospective vendors on TCS's Vendor List for the requested commodity or service. IFB solicitations will

designate a date and time bids will be publicly opened and read. Bid responses will not be accepted after the stated time and at location other than that which has been stated. Bid responses must be submitted as specified in the solicitation document. TCS is not responsible for the receipt of bids/proposals not properly identified or mailed/delivered to the wrong address. When all bid responses are unreasonable or unacceptable as to terms and conditions, are non-competitive, or the low bid exceeds available funds and it is determined in writing by Procurement Services that time or other circumstances will not permit the delay required to re-solicit competitive bids, a contract may be negotiated provided that each responsible vendor who submitted such a bid under the original solicitation is notified of the determination and is given a reasonable opportunity to negotiate. In cases where the bids received are non-competitive or the low bid exceeds available funds, the negotiated price shall be lower than the lowest rejected bid of any responsible vendor under the original solicitation. For all purchases accomplished by IFB, the award will be made to the lowest responsive and responsible vendor. This is the vendor who submits the lowest price, whose bid meets the specifications, terms, and conditions set forth in the IFB, and who is clearly capable of delivering the product or services specified. The lowest responsible vendor will not, therefore, always be the vendor who has submitted the lowest monetary bid. Award of bids will be made in the best interest of TCS. An award letter will be issued to the awarded vendor(s). The Superintendent or Director of Procurement Services is authorized to waive informalities, technicalities, irregularities and administrative mistakes in bids. A tabulation of all bids received will be developed for review.

Competitive Request for Proposal

A Request for Proposal (RFP) may be used to solicit offers for goods or services when price is not the sole determining factor being considered for award or when the Director of Procurement Services determines that the use of competitive sealed bidding is not advantageous to TCS. The person completing the requisition and requesting the funds is the responsible party for obtaining the prices and rate quotes as well as submitting the competitive request. Adequate public notice of the RFP shall be given in the same manner as provided for competitive sealed bidding. The RFP shall state the relative importance of price and other evaluation factors. Price will be included as part of the determination of best value. An evaluation committee will evaluate responses based upon published evaluation criteria. All voting members of the evaluation committee must be identified prior to beginning the evaluation process and will be required to sign an Evaluation Committee Code of Conduct form. Non-voting members may be identified and allowed to participate in all or part of the evaluation meetings on an as needed basis when it is determined to be in the best interest of the District. The evaluation committee may call upon individuals from within or outside the school district to assist with interpretation of information provided by vendors in response to a solicitation when the evaluation committee does not believe they have adequate knowledge to analyze the response. These individuals will be considered non-voting members of the evaluation committee. Committee members should refrain from discussing responses outside of evaluation meetings. A member of Procurement Services must be present at

all meetings between responding vendors and evaluation committee member(s) during the evaluation period. This includes meetings about projects outside the scope of the solicitation (i.e., existing contracts).

The RFP solicitation will designate a date and time offers are due. Offers will not be accepted after the stated time and location than that which has been stated. There is no public opening of RFP responses. RFP responses must be submitted as specified in the RFP document. RFPs usually require that the non-cost section of the response be submitted separately from the cost form. Responses should be labeled with the vendor name, the RFP number and name, the due date and time and whether the contents are the cost or non-cost section of the proposal. TCS is not responsible for the receipt of proposals not properly identified or mailed/delivered to the wrong address. Proposals will be evaluated and scored based on the published criteria. During the evaluation phase, discussions may be conducted as needed with vendors. These discussions are for the purpose of negotiations, clarifications, and to assure full understanding of and responsiveness to the solicitation requirements. Vendors will be accorded fair and equal treatment with respect to an opportunity for discussion and revision of proposals. A determination of competitive range may be made during the evaluation process. The federal program director is responsible for ensure technical assistance and evaluation of the process. All documents are maintained by the finance director with the purchase.

Exceptions to Full and Open Competition

Procurement Services recognizes that there are circumstances where full and open competition is not in the District's best interest. If the requesting school or department is utilizing grant funds or other special funds, it is their responsibility to verify that the funds do not require a competitive solicitation prior to citing one of the exceptions. The following situations can necessitate exceptions to full and open competition through a competitive solicitation.

Sole/Single Source Purchase

When supplies or services are readily available from only one responsible source. Use of this authority may be appropriate in situations such as the following, (the examples are not intended to be all-inclusive and do not constitute authority in and of themselves).

- When there is a reasonable basis to conclude that the minimum needs can best be satisfied by unique supplies or services readily available from only one source with unique capabilities.

- When purchasing items over the designated monetary threshold, see Procurement Services dollar thresholds as defined above, schools/departments must use the “Sole/Single Source Justification” form, available on the Procurement Services intranet website to submit the following information:
- Explain why this is the only product or service that can meet the needs of the purchasing agency.
- Explain why this vendor is the only practical available source from which to obtain this product or service.
- Describe what efforts were made to conduct a negotiation to get the best price, delivery, warranty and payment terms for TCS. Procurement Services reserves the right to negotiate further with the vendor for discounts, the best value, etc.
- Include any documentation from the manufacturer or publisher to support the sole source status.

Others

The Federal awarding agency or pass-through entity expressly authorizes noncompetitive proposals in response to written requirements from non-federal entities. After soliciting a number of sources, competition is determined inadequate.

Price/Rate Quotes

The end-user is responsible for obtaining price/rate quotes and evidence of the quotes must be attached to the purchase order/requisition in the financial software program.

Written Conflict of Interest Policy

2 CFR 200.318(c)(1)

Definition of Conflict of Interest

All TCS employees are strictly forbidden from accepting gratuities or discounts for personal gain. These include but are not limited to, those arising due to a purchase made for the school or the school system. By accepting a gratuity or discount, a conflict of interest is created.

District employees shall not engage in unethical behavior or compromising practices in relationships, actions and communications with present or potential suppliers, contractors or subcontractors. Further, District employees shall avoid the intent or appearance of unethical behavior or compromising practices in relationships, actions and communications with present and potential suppliers, contractors or subcontractors.

Standards of Conduct

District employees or consultants are expressly prohibited from soliciting, demanding or accepting directly or indirectly, any economic opportunity, future employment, gift, loan, gratuity, special discount, trip, favor or service in connection with the following:

- Approving, disapproving, recommending or preparing any part of a program requirement or purchase request;
- Influencing the content of any specification or procurement standard, rendering of advice, investigation or audit; and
- Awarding a contract.

No employee, officer or agent may participate in the selection, award or administration of a contract supported by a federal award if/he she has real or apparent conflict of interest. Purchases from Board members or companies in which the Board member or a member of his/her immediate family has a controlling interest are prohibited. Purchases from employees or companies in which the employee, spouse or children have a controlling interest and are in a procurement decision-making role are prohibited.

Chain of Command

Any District employee who observes or suspects unethical behavior in the procurement of goods or services should report that behavior to the following individuals or offices, as appropriate under the circumstances:

1. The individual's supervisor;
2. The Director Procurement Services;
3. The Financial Officer;
4. The Human Resource Officer;
5. The Superintendent's Office; or
6. The Board of Education.

Nominal Items

Nominal items are described as an item having a value of under \$25, such as a vendor paid for lunch.

Procedures Pertaining to Specific Federal Programs

Title I, Part A Within District Allocation Procedures

Allocating Funds to Attendance Areas

ESEA: Sec. 1113; 34 CFR 200.70 and 200.71

The Eligible Attendance Area Worksheet is to be completed as early in the fiscal year as possible by the Director of Federal Programs after being provided the information by the Director of School Nutrition.

Model 1-The following procedures are used to complete the annual Eligible Attendance Worksheet when no new schools are opened, and/or attendance areas are reconfigured. In this case, data from the previous fiscal year October FTE count is used.

1. FTE Enrollment by Grade Level Report for October of the previous fiscal year is downloaded from the Georgia Department of Education (GaDOE) website.
2. Free/Reduced Price Meal Eligibility Report for the previous October FTE count is obtained from the Director of School Nutrition.
3. The Director of Federal Programs enters data from all schools on the Eligible Attendance Worksheet in the Consolidated Application.
4. Schools are ranked, Districtwide, based on highest to lowest percentage of students eligible for Free/Reduced Price Meals.
5. Schools with 75% or more Free/Reduced Price Meals eligibility are ranked first; then remaining schools are ranked, Districtwide.
6. The District identifies schools with 43% or more Free/Reduced Price Meal eligibility as potentially Title I eligible.
7. Allocations are made on a per-pupil basis, with the highest per-pupil amount allocated to the schools with the highest percentage of low-income children. The per-pupil amount for lower-ranked schools will not exceed the per-pupil amount allocated to the next highest ranked school.
8. Backup data is retained in the Eligible Attendance Area Worksheet file for future reference/review by monitors.

Model 2-The following procedures are used to complete the annual Eligible Attendance Worksheet when a new school is opened, or attendance areas are reconfigured. In order to obtain the most accurate information possible, the District typically opts to use current-year enrollment, Free/Reduced Price Meals eligibility and Pre-K data in order to complete the Worksheet.

1. FTE Enrollment by Grade Level Report for October of the current fiscal year is downloaded from the GaDOE website
2. Free/Reduced Price Meals Eligibility Report for October of the current fiscal year is obtained from the Director of School Nutrition.
3. The Supervisor of Federal Programs enters data on the Eligible Attendance Worksheet in the Consolidated Application.
4. Schools are ranked, Districtwide, based on highest to lowest percentage of students eligible for Free/Reduced Price Meals.
5. Schools with 75% or more Free/Reduced Price Meals eligibility are ranked first; then remaining schools are ranked, districtwide.
6. The District identifies schools with 43% or more Free/Reduced Price Meals eligibility as potentially Title I eligible.
7. Allocations are made on a per-pupil basis, with the highest per-pupil amount allocated to the schools with the highest percentage of low-income children. The per-pupil amount for lower-ranked schools will not exceed the per-pupil amount allocated to the next highest ranked school.
8. Backup data is retained in the Eligible Attendance Area Worksheet file for future reference/review by monitors.
9. If a school attendance area is being reconfigured with minimum student movement, the previous year's FTE and Free/Reduced Price Meals numbers will be utilized and procedures from the Title I Procedures Handbook will be followed to track students and make adjustments to the data to accurately reflect enrollment as if the new redistricting was in existence on the date of the previous year's October FTE count.

Rank Order

The Trion City Schools District ranks all of its school attendance areas (the geographic area from which a public school draws its children) according to their percent of poverty. The same measure of poverty is used to identify eligible school attendance areas, determine the ranking of each area and determine the allocation for each area. The poverty measure used is the number of children eligible for free/reduced-price meals under the National School Lunch Act. School attendance areas are ranked based on the percentage of students qualifying for free/reduced meals counted. Per pupil amounts are allocated to schools based on a review of data and needs identified by each school. The Trion City Schools District has no residential treatment facilities.

Reservation of Funds

ESEA: Sec. 1113; 34 CFR 200.70 and 200.71

After receiving notification of the Title I, Part A grant amounts from the Georgia Department of Education (GaDOE), Trion City Schools allocated funds as indicated by the guidance of the GaDOE. At this time Trion City Schools is not required to have set asides for N/D, PFE carryover. If our allocations including transfers should be larger than \$500,000.00, then there will reservations would be set aside as required or applicable components such as Homeless Children and Youth, Neglected and Delinquent Children, Parent and Family Engagement and Private Schools. Administrative costs, which are not part of schools per pupil amounts, are also part of the reservations. 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.

Homeless Children and Youth

Title I local education agencies (LEAs) are required to set aside funds within their budgets to meet the needs of homeless children and youth. Using Method #1 the District determines the needs of homeless students and sets aside sufficient funds to meet their needs. The District has set aside \$400.00 for homeless students. Trion City Schools selects Model 1 from the four models listed below.

Method 1: Identify homeless student needs and fund accordingly

Method 2: Obtain a count of homeless students and multiply by the district's Title IA per-pupil allocation (PPA)

Method 3: Reserve an amount greater than or equal to the district's McKinney-Vento subgrant request

Method 4: Reserve a specific percentage of the district's poverty level or its Title IA allocation

Neglected and Delinquent Children

The Trion City 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 Trion City 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 Trion City 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.

The District sets aside the appropriate amount based on the allocation from the GaDOE, when required.

Parental and Family Engagement

Calculating Parent and Family Engagement Carryover

Trion City School is not required to set-aside funds for Family Engagement. If it ever occurs, a worksheet would be provided by the GaDOE to determine the amount of parent and family engagement carryover from the previous fiscal year. The Title I Director would complete and upload this worksheet, along with a detailed expenditure report for family engagement for the previous year to the Consolidated Application Attachments tab.

If Trion City Schools were to receive \$500,000.00 or more funds the following procedures would be followed for Parent and Family Engagement set aside: A minimum of ninety percent (90%) of one percent (1%) of the entire Title I allocation is allocated to schools. If a school or all Title I schools within the District decide to use its share of the 1- percent reservation for parental and family engagement under the Every Student Succeeds Act (ESSA) of 2015 to support a District activity, then each participating Title I principal must comply with Title I procedural requirements.

Private School Proportionate Share

Trion City Schools currently does not have participating Private Schools. If a Private School were to be identified and selected to participate, Trion City Schools District must reserve funds to provide comparable services for eligible children in participating private schools. Procedures would include the following: At the beginning of March prior to the service year, the Director of Federal Programs or designee requests enrollment data from the private school for November 1st. The data requested includes last name, first name, grade, and address. The private school is asked to submit the data by the end of March. Director of Federal Programs or designee reviews the enrollment list and verifies the addresses to determine the number of

students residing in Trion City Schools District Title I attendance zones on the November 1st count day. The District consults with the private school through meetings, phone and/or email to discuss how poverty information will be collected. The District and the private school agree upon a method for income determination. For Title I, Part A, income determination is collected for students who attend the private school and reside in Trion City Schools District. The Director of Federal Programs or designees share the current information with the private school contact at the beginning of March. A deadline for completion is also given to the private school (end of March). Private school proportionate share is determined by the GaDOE.

Rank Order

Trion Elementary School is the only Title I school in the systems. If more schools were to participate, schools would be placed in rank order using the percentage of students that qualify for free and reduced priced meals according to grade span grouping.

Equitable Services Plan Development Timeline for Title I

January/February

- Collection of students in Title I attendance zone and students receiving free/reduced meals data
- Determination of the Multiple Selection Criteria to be used to determine eligible students with private schools
- Review of options for service providers
- Decide on dates for future meetings

March/April

- Obtain list of names, addresses, and grades of private school students who meet the criteria for Title I service
- Select for Title I services those students most at-risk of failing as decided upon in consultation
- Rank the students by greatest need for service
- Discuss professional development needs of the private school teachers based on the most recent student assessment data
- Determine the criteria that will be used to measure the effectiveness of professional learning
- Discuss the needs of the parents and how they can better support their child's instruction • Determine the criteria that will be used to measure the effectiveness of parent and family engagement
- Discuss how the program will be evaluated: standards, assessments, benchmarks used for

annual progress and percentage of participants required to show progress to measure effectiveness

- Establish the date that services will begin

May/June

- Finalize the designs of the program and ensure materials have been ordered • Ensure that District personnel who are providing services are in place and service start date is firm
- Finalize and establish a calendar for professional learning activities for private school teachers
- Establish and finalize a calendar for parent and family engagement programs and activities for parents of private school students
- Complete form A in ES4PS Platform

Implementation Timeline

August/September

- Begin services for students identified the previous spring as participants or as requested by participating private schools
- Obtain a list of newly enrolled students who meet eligibility criteria and consult with private school officials on how new students might be accommodated in the program
- For Title I, review criteria to be used for evaluation of the effectiveness of the Title I program including the following areas: academic, parent and family engagement and professional development.
- For Title I, Host Title I Parent Information Meeting

October/November/December/January/February/March

- With established Private Schools, conduct onsite visit for physical inventories of equipment in the fall of each year
- Meet with private school officials periodically to determine if the program is operating smoothly and effectively
- Meet with private school teachers periodically to determine if the program is operating smoothly and effectively
- Make on-going adjustments to ensure student needs are being met
- For Title I, monitor implementation of the parent and family engagement component of the program
- If applicable, monitor implementation of the professional development component of the program
- Ensure conference(s) are occurring between the Title I teacher and the private school teacher(s) and parents of participating students
- For Title I, Host Title I Parent Information Meeting, if not already held
- Conduct teacher observations periodically to verify effectiveness of teaching skills and

instruction

April/May

- For Title I, distribute parent survey
- Gather documentation to evaluate the effectiveness of the program based on the criteria established at the beginning of the school year and evaluate the effectiveness of the program
- Based on the evaluation, adjust and make changes to improve the program

Complaint Procedures

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

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

Within District Allocation Procedures

Targeted Assistance Programs

Trion City Schools does not currently have an identified Target Assistance Program. If a Targeted Assistance Program was identified and needed the following procedures would be followed:

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 Trion City School System serves only the elementary school and it operates as a Title I Schoolwide Program

Family Engagement

Family Engagement Policy Overview

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

Technical Assistance to Schools

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

Trion City Schools provides technical assistance to schools in the following ways:

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

Parent Notifications

Communication in an Understandable Format

Upon enrolling their child(ren) in the Trion City School System, every parent indicates their household's preferred communication language as a standard part of the registration process. To the extent practical, efforts are made to provide either written support or support through an interpreter when a parent indicates a

language other than English. A district translator is available for meetings and translation of documents. Furthermore, all parent communication is written in a format so that the content is easily understandable.

School Designation Status

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

Parent Right to Know

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

School principals are responsible for providing a copy of the student-parent handbook containing the Parent's Right to Know to the appropriate Federal Programs Director as evidence of parental notification of their Right to Know. If a school omits the notification from their student handbook, the Federal Program Director will notify the principal that he/she is required to notify each parent of their Right to Know via First class mail before the end of the first week of school. In this case, a copy of the notification letter will be provided to the director. The "Right to Know" will include the month/year of dissemination. Responses to parent requests will be made within one week. The Parent Right to Know notification will also be posted on the District webpage.

20 Day Notification of Professional Qualifications

In accordance with ESSA all schools are required to provide timely notice to parents when students have been taught for four or more weeks by a teacher who does not meet applicable state certification or licensure requirements at the grade level and subject area in which the teacher has been assigned. Notification requirements apply to all teachers in all schools/programs. Notifications will be sent within ten business days following the four consecutive weeks. For verification purposes notifications must contain: day, month, and

year of notification; the name of the teacher who has not met PQ, the name of the school and district; and a statement that the teacher has not met state certification or the district's charter waiver PQ requirements for the grade and subject in which the teacher is assigned. The notification will be sent in a format that ensures parents can receive the information. This may include: first class mail, parent link communication and/or email blast. To the extent practicable, the notification will be in a language the parent will understand. This applies to all teachers in all schools/programs.

Regular Education Teachers:

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

Special Education Teachers:

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

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

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

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

Family Engagement 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.

Trion City 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, training, 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 Trion City School System using multiple means. The policy/plan will be available on the Title I page of the district's website (www.trionschools.org, in hard copy format in the office of the Family Engagement Specialist, and at the school)..

The district/ school Parent and Family Engagement plan is reviewed and revised annually with parents and other stakeholders (teachers, principals, administrators, and other school personnel). Schools hold individual meetings for review of the district and school Family Engagement Plans. All Title I parents, teachers, administrators, and other school personnel in the district are invited to the meetings to provide input. Notices will be posted for stakeholders 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 Family Engagement 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 Family Engagement Policy checklist will be applied to district and school plans. Revision dates will be clearly marked on each plan. The Family Engagement Specialist and/or the Title I Director will review plans before or during on-site monitoring visits. Plans include activities/workshops that have been identified and requested through the previous year's annual Family Engagement survey. School improvement and Family Engagement plans are posted on the website, available in the Family Engagement office of the school, and hard copies provided in the Title I Informational Handbook upon enrollment at the school.

Each school in the Trion City 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 Family Engagement Plans, Schoolwide Title I Plans, School Improvement Plans. Parents are notified about this opportunity through advertisements in local media, school-level flyers, social media websites and by using the system automated phone calling system and the system 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 Family Engagement Plans are made available to parents on the district website and on Title I schools' websites. Copies are also available in parent resource centers. Parents are also given the opportunity to provide feedback about Title I programs by completing annual parent surveys. These comments are used by the district and Title I schools when planning parenting programs.

Plans are shared with faculty, staff, students, parents, and community members on school websites and the district Federal Programs website located at: www.trionschools.org. Plans include district and school improvement/schoolwide plans, Family Engagement policies, school compacts, comprehensive LEA improvement plan, parents' right to know, complaint procedures, and policy on ethics and fraud, waste, and abuse. Many of these plans are included in student handbooks. 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 Trion City School System will share responsibilities for high student academic achievement with all parents and students enrolled in the school system and will develop, in collaboration with parents and students, a school-parent compact that outlines how parents, school staff, and students will share the responsibility for improved student academic achievement. The school-parent-student compact will also describe how the school, parents, and students will build and develop a partnership to ensure student mastery of the GA DOE's high academic content standards.

All Title I schools are required to have school-parent compacts. It is the responsibility of the principal, in coordination with the school system Parent and 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 leadership 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

Parent and Family Engagement Specialist will be responsible for coordinating with the school 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 Trion City School System Board of Education believes that the public schools belong to the people who create them and that student educational goals should reflect the goals of the community. We affirm and assure the rights of parents to participate in the development of the goals and objectives of the public schools and encourage involvement in all areas of their children's educational experiences.

Annual Title I Meeting

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

Annual Evaluation of Parental Involvement

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

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

Actions Taken by LEA to Improve the Quality and Effectiveness of Family Engagement 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.

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

Capacity for Parent and Family Engagement

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

The Parent and 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?

Trion City School System builds parent capacity to impact student achievement by offering virtual meetings, face to face meetings, and a Google Classroom dedicated to Family Engagement. Trion Elementary School has reimplemented a version of Academic Parent Teacher Teams (APTT), which is called Teacher Empowering Academic Mindset (T.E.A.M.)

Parent Resource Center

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

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

No later than 30 calendar days after the beginning of the school year (or within the first two weeks of an EL being placed in a program), the ESOL teacher will notify parents of English Learners if their child is participating in a supplementary language program. The notification will be provided in a language parents can understand. Initial letters will be shared with the parent during a Continuation of Services ESOL meeting indicating the student's ESOL services and whether the student is receiving supplemental services. Subsequent letters will be generated by the student's ESOL teacher and sent home with the student, if needed.

Schoolwide Program

Overview

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

- If the local educational agency (LEA) determines that the school serves an eligible attendance area.
- 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 a 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.

ESSER grants do not have this stipulation.

Components of a Schoolwide Program

Each schoolwide program must create a plan to address the following components of the GaDOE Schoolwide Program Checklist:

1. Comprehensive Needs Assessment
2. Schoolwide Reform Strategies
3. Schoolwide Plan Development
4. ESSA Requirements for Schoolwide Plans

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

All Title I schools within the Trion City School System conduct Schoolwide Programs. This allows all children in these schools and their parents equal access to all related Title I assistance. Schoolwide Plans are updated and verified using a checklist during a school leadership meeting. Parents are also invited to a system level Parent Advisory Council meeting. All schools will notify stakeholders in multiple ways, notice

of the meeting dates will be placed on each school's display signs, in each school newsletter and on the web site, parents and other stakeholders will be notified by invitation sent from each individual school and all stakeholders will be notified using each school phone messaging system. Parents who cannot attend the meeting will be given the opportunity to obtain a copy from each school and submit input before the final revisions are approved. Revision dates will be clearly marked on each plan. The system Family Engagement Specialist will be responsible for collecting required documentation (agenda, meeting notes, and sign in sheets). At these meetings, parents and other stakeholders are given an opportunity to provide input on the Schoolwide Title I Plan/School Improvement Plan, Parent/Student/Teacher Compacts, Family Engagement Plans, and the Comprehensive LEA Improvement Plan.

LEA Guidance

On-site meetings are held with principals to discuss the status of their plans regarding checklist components. Missing or items in need of revision are marked on the checklist and then rechecked when the revised plan is submitted. As previously stated, system leaders support schools in developing, revising, implementing, and coordinating school improvement and schoolwide plans during regularly scheduled administrative and Instructional Coach meetings. During the meetings, data is analyzed to identify and develop solutions to challenges related to instructional strategies, Family Engagement, professional learning, and budgets. The district also conducts a workshop each June to provide schools with technical assistance on finalizing their plans.

Schoolwide Program Plan Development

School Improvement Plans are updated each spring for the following school year. Each school leadership team conducts a spring meeting at which representatives from each grade level, content area, and department, as well as system and school administration and parents meet to develop a plan. During school leadership meetings, instructional strategies, parental involvement initiatives, and professional development activities are planned after a careful analysis of various data. Assistance is also provided to schools in their use of school improvement funds to accomplish initiatives in their school improvement plans. School administrators then present their school plans at the annual system leadership summit as they work with other schools, system leaders, and parents to develop a system improvement plan. It is through this process that the LEA oversees the development of school improvement plans.

Consolidation of Funds

The Trion City School System does not consolidate federal funds.

Rank Order

Trion Elementary School is the only Title I school in the system. If more schools were to participate, schools would be placed in rank order using the percentage of students that qualify for free and reduced priced meals according to grade span grouping.

Carryover

As Trion Elementary is the only school utilizing Title I funds, all carryover is allocated through their budget. Should more schools participate, carryover funds would be 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 re-calculated 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 Directors track 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.

Monitoring and Oversight of School Improvement

All Title I schools within the Trion City 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 to build capacity and support the school improvement process in schools identified as needing comprehensive or targeted support interventions. All schools identified as needing comprehensive or targeted support interventions within the LEA will be involved in school improvement efforts through the work of the LEA, RESA, and GaDOE. Members of the system will work with these schools to implement practices that have proven effective with improving schools. Members of the Teaching & Learning Department, along with the GaDOE, will establish clear expectations for personnel as they systematically support continuous improvement in all schools. However, more intensive support will be

provided by LEA and GaDOE School Improvement Specialists in any schools within the Trion City School System that are designated as needing comprehensive or targeted support interventions. The Title I Directors will conduct a yearly evaluation of school improvement efforts for all Title I schools using the Trion City School System Federal Programs School Monitoring Checklist. Members of the Teaching and Learning Department will conduct progress checks to determine the extent to which school improvement plans have been implemented. These checks will occur quarterly.

Review and Approval of School Improvement/Schoolwide Plans

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

Budgeting Procedures

The Title I Director will meet with school leaders at each school served under this grant to jointly develop a budget based on the prioritized needs identified during a comprehensive needs assessment. The Title I Director will continually communicate with each school to review and provide recommendations for ongoing budgeting decisions.

Monitoring and Reviewing Schoolwide Plans

System directors of federal programs leaders support schools in developing, revising, implementing, and coordinating school improvement and schoolwide plans during regularly scheduled meetings of administrators.. During the meetings, data is analyzed to identify and develop solutions to challenges related to instructional strategies, Parent and Family Engagement, professional learning, and budgets. Each school, including those identified as needing comprehensive or targeted support interventions, must submit a school based plan for professional development to be reviewed and approved after recommendations by the Title I

Directors and other members of the Teaching and Learning Department. Plans are due each August and must generally be approved by the end of September.

Title I, School Improvement (1003a) Grant

The Trion City School System does not currently have any participating schools in this grant.

Title I, School Improvement 1003(g) Grant

The Trion City School System does not currently have any participating schools in this grant.

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

Introduction

The Trion City 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, campgrounds, 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 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.

Credit for Full or Partial Coursework

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

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

Training of Personnel

The Homeless Liaison or designee annually conducts training and sensitivity/awareness activities to heighten the awareness of the following personnel of the specific needs of unaccompanied and homeless youth: principals, assistant principals, federal program administrators, transportation employees, registrars, school secretaries, school counselors, custodians, school nurses and teachers. The liaison obtains from every school the name and contact information of a building liaison. The liaison maintains documentation (agendas and sign-in sheets) of these meetings.

Coordination

The liaison shall coordinate with and seek support from the State Directors 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.

Notification to Stakeholders of the Homeless Liaison Contact

Posters related to the Homeless Program that include the name and contact information of the Homeless Liaison are posted at each school and at various community centers. This same information is also available on the system website. Information related to all federal programs, including MVP and the Homeless Program is provided to all faculty and staff annually via email.

Preschool

Preschool education is an especially important element of later academic success. Children experiencing homelessness have experienced many difficulties accessing preschool opportunities. Our system will ensure that children experiencing homelessness receive assistance in locating preschool programs.

Children with disabilities who are experiencing homelessness will be referred for preschool services under the Individuals with Disabilities Education Act (IDEA). Children under age three with disabilities who

are experiencing homelessness will be referred for at-risk services under Part C of IDEA and screened to determine if referrals for additional Part C services are appropriate. The liaison will collaborate with Head Start and Even Start programs and other preschool programs to ensure that children experiencing homelessness can access those programs.

Protocols

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

1. Student is identified as potentially eligible for MVP services and is in one of the following circumstances.
 - a. Student is a new enrollee.
 - b. Student is currently enrolled in a Trion City School.
 - c. Student is residing in Trion City but has a school of origin in another school system.
2. School system staff (school counselor, 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 Trion City and seeks to attend a Trion City 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 Directors, school-based liaison, school administrator.
5. If the student does not reside within the boundaries of Trion City but seeks to remain in the school of origin in Trion City 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 a parent disputes this decision, then students stay in the selected school.
9. If a 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 Trion City Schools. The Superintendent will inform the parent/guardian of his/her decision in writing along with a copy of the Georgia Appeals process.
12. If 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 Trion City School System currently has no centers or agencies in its geographical boundaries that serve neglected or delinquent students.

Foster Care Transportation Plan

Planning

Real time coordination will occur between Case Managers, Homeless Liaison, Foster Parents, and Court Appointed Special Advocates, regarding foster children entering and exiting care; changing placements; enrollment and withdrawal; and making best interest determinations. When transportation is an issue, those parties will collaborate to develop a transportation plan that meets the needs of the individual child.

Transportation Plan

Trion City Schools Homeless Liaison also acts as the Foster Care Point of Contact for Trion City Schools. The Foster Care Transportation Plan is in the Federal Programs Director office at TCS central office, shared annually with the local child welfare agency, and uploaded as part of the system's CLIP.

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

Identification and Recruitment

Migrant students are identified through the occupational survey, which is a portion of the student enrollment packet. When migrant students are identified, a comprehensive needs assessment and delivery plan will be developed.

The Migrant Education Coordinator is responsible for maintaining, updating, and properly coding all required enrollment, education, and health data in Trion City School's System's Student Information System on migrant eligible students and shares this information on an intra-district and interstate basis. The MEP Coordinator will provide training and resources to the schools, administrators, and the Central Office/Registration.

The MEP Coordinator meets throughout the year with the MEP Area Specialist to coordinate Migrant enrollments and to ensure the identification and recruitment services are provided.

The Trion City School System MEP Coordinator forwards all the completed Parent Occupational Survey forms 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. These forms are forwarded to the area MEP Specialist. 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. Contact is then made with each potentially eligible family to determine case-by-case eligibility and needs. The appropriate Federal Program Director works closely with the MEP Specialist to ensure enrollment and SIS information is updated and accurate. Students who meet certain critical criteria are also identified with the assistance of the GaDOE MEP as Priority for Services.

The Occupational Survey is sent home with every child in the district. During each summer, updated Occupational Survey Forms are sent to all schools for inclusion in Registration Packets for all new students. Data from completed Occupational Survey Forms are collected from the Family/guardians, entered the SIS by the schools' attendance clerks, and then sent to the Migrant Program Coordinator at the Central Office. These forms are forwarded to the MEP Specialist/ Recruiter who will schedule a visit with the student's Family/guardians to determine eligibility.

Cross-checking Migrant Data

The System FTE Coordinator codes the students in the Student Information System to ensure accurate data reporting to the State when the Migrant Education Agency has identified a student as Migrant. Monthly reports are received through the ConAp, showing our qualifying Migrant students. The data is checked for accuracy and verified in the student information system.

Priority of Services

The appropriate Federal Program Director verifies services of identified students by using grade reports in the student information system.

Services for MEP Students

Currently, Trion City Schools is in the Migrant Consortium. Students identified as migrants are monitored throughout the year when interims and reports cards are issued. Students who are not performing on grade level are offered tutoring services through the school. Should these not be sufficient, the consortium would be contacted to see if funding is available for additional tutoring.

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

Should we ever receive funding, a Migrant Education Parent Advisory Council (PAC) program would be provided in conjunction with other District Family Engagement Programs. Parent outreach is always provided in a language that is understood by the family. Families 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

Should we ever receive funding, TCS would implement a MEP Comprehensive Needs Assessment Committee to review 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

Should we ever receive funding, the MEP Specialist would observe the actual delivery of the IPs and report 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.

Translation and Interpretation

The Trion City School System believes that ALL Families need access to district and school information. We encourage our families to contact us when they have a question or need for language assistance in terms of understanding district and school information. Interpretation services are available through school/district personnel for families whose native language is not English. Translated district and school's information are available in Spanish to meet the needs of our families.

Title II, Part A - Teacher and Leader Effectiveness

Purpose

Purpose: The purpose of Title II, Part A is to increase academic achievement by improving teacher and leader quality. For FY19, Trion City Schools transferred all Title II, Part A funds and carryover funds to Title I, Part A.

Equity Belief Statement

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

Needs Assessment

Each spring, the Trion City School System begins the needs assessment process by surveying all leaders, teachers, and paraprofessionals. Once survey results are tallied and summarized by school and system leaders, the results are shared with each school. The needs assessment process at each school includes examining student achievement data, perception data from stakeholder surveys, professional learning plans, teacher recruitment and retention data, highly effective teacher and paraprofessional data, class size data, peer walkthrough data, TKES data, and verbal input from stakeholders.

Once the input is collected from the schools, meetings are then held at the district level to consider all the prior stakeholder input and data and to make decisions regarding prioritized needs and equity concerns.

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

Equity Plan

The Equity Plan addresses where our district is in meeting the challenge of each equity indicator to assure that all students are receiving the best possible educational opportunities available in an equitable manner.

The Equity Plan serves as the plan detailing professional learning and effective equitable practices among teachers. TCS determines equity needs as part of the needs assessment process.

The areas for assessing equity include looking at the relationship of our district compared to the state for all schools, high poverty schools and high minority schools in the following:

- CCRPI data
- First Year Teachers
- Teacher Experience
- Out of Field Teaching Assignments
- Teacher Absenteeism
- Teacher/Leader Retention
- Graduation Rate
- Discipline Data
- Student Growth

To develop our Equity Plan we do the following:

- Equity data is provided by the Georgia Department of Education Teacher and Leader Effectiveness Division.
- School administrators, curriculum coordinators, student services and other district office leaders work with the school improvement team to analyze equity data during district data meetings.
- The Equity data analysis is shared during district data meetings and suggestions for activities that will help us overcome any equity gaps are shared.
- The Equity Plan is revised based on feedback and submitted within the CLIP.
- The Equity Plan is reviewed annually and may be revised and adapted as needed. Sign-in sheets and agendas are maintained as evidence and documentation of stakeholder involvement in the process.

The Directors of Federal Programs, principals, and assistant principals monitors the implementation of all activities included in the Equity Plan. The Directors of Federal Programs collaborates with each person responsible for each activity to monitor the timeliness of each activity. As each activity is completed all source documentation is collected and maintained by the Federal Programs Director.

Prioritized Needs

Based on the TCS Needs Assessment, priorities are identified for the district and identified in the Consolidated Application.

Effectiveness Plan

TCS is not required to submit an Effectiveness Plan, as funds are transferred into Title I, Part A.

Professional Learning

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

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

Professional Qualifications of Teachers and Paraprofessionals

The Trion City School System seeks to hire qualified teachers, paraprofessionals, and administrators. Vacancies are posted on www.teachgeorgia.org. A job description is included as well as job requirements. This ensures that the applicants have met the minimum qualifications to meet the required professional qualifications. Qualified applicants are then eligible to interview with principals, interview committee, or identified designees. Principals make recommendations to the superintendent, who in turn presents the candidate to the school board for approval. After board approval, candidates are fingerprinted and complete required paperwork for employment.

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

If a student has been assigned to or has been taught for four or more consecutive weeks by a teacher who does not meet professional qualifications, parents will be provided a timely notice. All notices and information required must be in a uniform and understandable format, including alternative formats upon request and, to the extent practicable, in a language that parents understand. Parents may request and receive information regarding:

- Whether the teacher has met state qualifications for the grade levels and subject areas in which the teacher teaches.
- Whether the teacher is teaching under emergency or other provisional status.
- The baccalaureate degree of the teacher and any other graduate certification or degree held by the teacher and the field or discipline of the certification or degree.
- Whether the student is provided services by paraprofessionals.
- Parent notification is not required for the following:

For teachers who do not teach core academic subjects.

For paraprofessionals who are not highly qualified.

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

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

Parents' Right to Know

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

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

(Sec 3113(b)(2))

Purpose

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

Trion City Schools does receive Title III funding and does not participate in a Title III Consortium. Students at Trion City Schools are EL eligible, are still identified, provided services, monitored, and participate in state mandated testing. TCS is responsible for meeting OCR requirements for all students.

Student Assessment, Identification, and Enrollment Procedures

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

The district notifies parents/guardians annually of their child's eligibility for ESOL. Such notification is made within the first thirty days of school for students continuing in the ESOL program and within two weeks of the date of eligibility determination for newly identified students. Parents/guardians have the right to decline ESOL services, as outlined in the annual notification. Upon their request, the ESOL teacher will contact the parents/guardians to ensure a clear understanding of the services offered and the educational implications of declining participation in the ESOL program. If the parents/guardians affirm their desire for their child be removed from the ESOL program, the school will provide a waiver form. Upon receipt of a signed parent waiver, the student will be removed from the ESOL program. The school must provide language assistance services through alternate means as outlined in the district procedures for indirect

language assistance services. The student remains eligible for classroom and testing accommodations and must participate in the state-mandated annual English proficiency assessment until meeting exit criteria. Parents/guardians continue to be notified annually of their child's eligibility until such time that the student meets exit criteria, and a new waiver must be collected annually. At any time, the parents/guardians may request reinstatement of ESOL services for their child.

Exit Guidelines

According to GaDOE guidelines, a kindergarten student must score a Composite Proficiency Level (CPL) of 5.0 or higher, a Writing subscore of 4.5 or higher, and no other individual domain score less than 5.0 to exit the ESOL program. Students in grades 1-12 who score a CPL of 5.0 or higher are considered English proficient and are exited from English language assistance services in accordance with GaDOE guidelines. As allowable under State ESOL program guidelines, TCS also elects to exit all students in grades 1-12 who achieve an overall score of 4.3-4.9 and to conduct classification Review meetings to determine readiness to exit for all students in grades 1-12 who score a CPL of 4.3 or 4.9.

An ESOL teacher monitors each exited student's academic performance for two calendar years following exit from English language assistance services. If an exited student transfers to the district during the four-year period following attainment of English proficiency criteria, the student is monitored for the remainder of the four-year period. ESOL teachers further collaborate with regular education teachers when the data indicates students may be struggling in one or more areas. If needed, additional academic support may be implemented through RTI. If a reasonable period of intervention and monitoring is unsuccessful and the student's difficulties appear to be related to English proficiency rather than academic deficits or disability, the RTI team may recommend considering to redesignation to EL status with direct ESOL services. The district reviews and responds to the disaggregated data for Formerly EL students.

Funding

The Trion City School System does receive direct funding for the Title III to purchase instructional materials, provide professional learning, conduct parent outreach, and to hire the necessary personnel to ensure that the needs of English Learners (ELs) are met. Needs are met through the state and local resources and funding.

Professional Learning

Every teacher of EL students, counselors, and administrators participate annually in job-embedded, ongoing professional learning relevant to ELs. The results of the annual comprehensive needs assessment guide school and district professional learning plans. ESOL teachers communicate students' current English

Language Proficiency (ELP) scores to staff members and assist their colleagues with identifying appropriate scaffolding techniques and instructional strategies based on these scores.

Parent Outreach

The district carries out an annual Title III event for families of EL students to inform parents of ways to assist their students academically, including understanding English Language Proficiency (ELP) scores as well as other assessments in which their children participate and their implications. School programs, resources, and activities are also shared with parents in these meetings, and parents are provided an opportunity to provide feedback and input. Each school also plans and carries out additional family outreach events throughout the school year to further assist parents, such as Teachers Empower Academic Mindsets (T.E.A.M.), in efforts to ensure that the activities are accessible to parents of English Learners who need assistance in another language. Rosetta Stone and/or Mango accounts are made available to parents of ELs who have a need and desire to improve their English proficiency to increase their capacity to help their children succeed in school. Adult English classes are offered to all parents of students who indicate English as a second language.

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

Supporting the Unique, Non-linguistic Needs of Immigrant Students

Immigrant students who qualify for English language assistance services are supported through the ESOL program. Regardless of English proficiency, immigrant students often arrive with myriad non-linguistic needs. Supplemental instructional materials and/or tutoring are provided to address academic gaps. Assistance with foreign transcript evaluation is provided to students entering with high school credits from another country. Counselors and social workers connect families with district- and community-based services to support non-academic needs such as health, counseling, food, housing, etc.

Program Evaluation and Accountability

The success of the ESOL instructional program and Title III supplemental programs and initiatives will be measured by analyzing the results of English Language Proficiency (ELP) assessments, ELP growth reports academic assessments, and other available measures. As a result of this analysis, programmatic and instructional adjustments are implemented as appropriate. A biennial Title III program evaluation will be conducted, and a report of findings completed. The report will describe the progress EL students have made in language acquisition and meeting specified annual content goals for EL subgroups, including ELs, monitored students, former ELs, and ELs with disabilities.

Title IV, Part A Student Support and Academic Enrichment

Purpose

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

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

Use of Funds

Title IV funds are transferred to Title I.

Individuals with Disabilities Act

IDEA procedures, including those for MTSS, Child Find, Parent Engagement, Procedural Safeguards, Identification Process, Evaluation/Re-evaluation, Eligibility, Supports and Services, College and Career Readiness, Student Progress, Discipline, and Local Policies and Procedures can be found in the Trion City School System's Student Support Services Department Manual.

Elementary & Secondary School Emergency Relief (ESSER) Funds

In response to the economic outcome of the COVID-19 pandemic in the United States, Congress passed three bills that provided immediate and direct financial assistance to state and local educational agencies through the Elementary and Secondary School Emergency Relief funds. These funds were provided to support areas with the greatest need, where the academic and non-academic components of school districts had the most significant impact due to COVID-19. As additional funding was provided, the funds were intended to support state and local school districts' efforts to safely reopen schools, address significant gaps in learning, and support measures of implementation that will continue to reduce the effects of COVID-19 on students and families. ARP is the remaining funding source provided.

- **Section 2001 of the ARP Act-American Rescue Plan (ARP) Act- Section 2001**

- The LEA must reserve at least 20 percent of funds to address learning loss by implementing evidence-based interventions, ensure that those interventions respond to students' social, emotional, and academic needs, and address the disproportionate impact of COVID-19 on underrepresented student subgroups.
- **LEA Safe Return to In-Person Instruction Plan (LEA ARP Application):** An LEA that receives ARP ESSER funds must publicly make a plan for the safe return to in-person instruction and continuity of services on its website. Before making the plan publicly available, the LEA must seek public comment on the plan.
- **Six-Month Review:** The LEA assures, during the period of the ARP ESSER award established in section 2001(a) of the ARP Act, that the LEA will periodically, but no less frequently than every six months, review and, as appropriate, revise its plan. The LEA will seek public comment on the development of its plan; the LEA will seek public input and take such information into account in determining whether to revise its plan and, if it determines revisions are necessary, on the revisions it makes to its plan.

Personnel Compensation

Employees may receive hazard pay for a national or local emergency or to perform critical services. Instances when this may happen may include a pandemic or a natural disaster. Employees will be compensated for fully completing an objective from a supervisor related to the aforementioned conditions.

Appendix A: Complaint Procedures

A. Grounds for a Complaint

Any individual, organization, or agency (“complainant”) may file a complaint with the Trion City School System if that individual, organization, or agency believes and alleges that TCSS 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. Although ESSER is separate from ESEA, the complaint process is the same.

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
- IDEA
- ESSER

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 Trion City 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 Trion City 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 Trion City 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 Angie R. Bowman, Director of Federal Programs and Curriculum. angie.bowman@trionschools.org or 706-734-2086

E. Investigation of Complaint

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

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

If additional information or an investigation is necessary, TCSS 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 Trion City 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 Trion City School System's decision and include a complete statement of the reasons supporting the appeal.

Appendix B: Tracking Form for Resolution of Complaints

Trion City School System

Federal Program

Tracking Form for Resolution of Complaints

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

