# Randolph County Schools

# **Federal Programs Procedures Manual**



Randolph County Schools 98 School Dr. Cuthbert, GA 39840 **Dr. Tangela Madge, Superintendent** 

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Randolph County School District will use these procedures and guidelines when accepting federal funds under The Elementary and Secondary Education Act of 1965, as amended by the Every Student Succeeds Act (ESSA) of 2015. The Every Student Succeeds Act (ESSA) reauthorizes the Elementary and Secondary Education Act of 1965 (ESEA) as the nation's national education law and longstanding commitment to equal opportunity for all students. The purpose of Federal Programs is to provide equitable distribution of services under ESSA. Randolph County Schools follows Federal guidance that is outlined in Elementary and Secondary Education Act and EDGAR (Educational Department General Administrative Regulations). The district is committed to allowing all children access to a high-quality education and reach proficiency on academic standards and assessments.

The purpose of this procedures handbook is to provide a systematic approach to managing the rules and guidelines of Title I and other Federal Programs to ensure consistent compliance. Each procedure has a narrow focus on its purpose, detailed description, and explains how, when/ and what position will maintain it. Procedures may change based on continuous improvement.

The Georgia Department of Education (GaDOE) provides LEAs extensive guidance on the over-arching requirements for Title I and other Federal Programs using the on-site monitoring guidance provided to ensure that LEAs are meeting all statutory requirements of Title programs. These specific requirements from the GaDOE were used to create this handbook.

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# **Descriptions of Federal Programs**

<sup>\*</sup>Randolph County School District is a Charter System

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

Title I provides federal funding to schools that serve an area with high poverty. The funding is meant to help students who are at risk of falling behind academically. The funding provides supplemental instruction for students who are economically disadvantaged or at risk of failing to meet state standards. Students are expected to show academic growth at a faster rate with the support of Title I instruction.

The Title I program originated as the Title I of the Elementary and Secondary Act of 1965. It is now associated with Title I, Every Student Succeeds Act of 2015 (ESSA). Its primary purpose was to ensure that all children were given the opportunity to be provided with a high-quality education.

Title I is the largest federally funded education program for elementary and secondary schools. Title I is also designed to focus on special needs populations and to reduce the gap between advantaged and disadvantaged students.

Title I is intended to serve students in core academic subject areas: Reading/Language Arts/English, Math, and Science and Social Studies.

#### Title I, Part A- School Improvement 1003(a)

The Title I, Part A, Section 1003(a) School Improvement Grants provide financial resources to Local Educational Agencies (LEA) on behalf of Title I schools identified as Comprehensive Support and Improvement and Targeted Support and Improvement schools. This grant is awarded to support implementation of school improvement plans required by the Elementary and Secondary Education Act (ESEA) and Georgia's Every Student Succeeds Act (ESSA) approved by the United States Department of Education.

Schools may use funds to support interventions needed to address the school's reason for receiving the school improvement funding. As these funds are a part of Title I, the same limitations to expenditures apply.

#### <u>Title I-C, Migrant Education Program</u>

The Migrant Education Program (MEP) is a federally funded program designed to support comprehensive educational programs for migrant children to help reduce the educational disruption and other problems that result from repeated moves.

#### Title II-A, Teacher and Leader Effectiveness

The purpose of the Title II, Part A program is to increase academic achievement by improving teacher and principal quality. This program is carried out by: increasing the number of highly effective teachers in classrooms; increasing the number of highly effective principals and assistant principals in schools; and increasing the effectiveness of teachers and principals by holding LEAs and schools accountable for improvements in student academic achievement. School systems must work to ensure that all students, especially children of poverty and of color, have equitable opportunities to be taught by highly effective teachers.

#### Title III, Part A Language Instruction for LEP and Immigrant Students

Title III is a federally-funded program that provides eligible Local Education Agencies with funding

to supplement those ESOL services already in place. School districts with large EL populations receive direct Title III allocations, while school districts with lower incidence populations are grouped into the "Georgia Title III Consortium". Both ESOL and Title III hold students accountable for progress in, and attainment of, English language proficiency. Upon attainment of English language proficiency, students exit from supplemental language services.

#### <u>Title IV, Part A – 21<sup>st</sup> Student Support and Academic Enrichment (SSAE)</u>

Authorized in December 2015, the Every Student Succeeds Act (ESSA) introduced a new block formula grant under Title IV, Part A with a wide range of allowable uses. Title IV, Part A, Student support and Academic Enrichment (SSAE) grants are intended to improve students' academic achievement by increasing the capacity of States, LEAs, schools, and local communities to:

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

#### Title V, Part B – Rural Education Initiative

The Rural Education Initiative is designed to assist rural school districts in using Federal resources more effectively to improve the quality of instruction and student academic achievement. It consists of two separate programs – the Small, Rural School Achievement (SRSA) program and the Rural and Low-Income Schools (RLIS) program.

#### Title IX, Part A – McKinney-Vento Education for Homeless Children and Youth

The McKinney- Vento Education for Homeless Children and Youth program is designed to address the problems that homeless children and youth have faced in enrolling, attending, and succeeding in school. Under this program, State educational agencies must ensure that each homeless child and youth has equal access to the same free, appropriate public education, including a public preschool education, as other children and youth. Homeless children and youth must have access to the educational and other services that they need to enable them to meet the same challenging State student academic achievement standards to which all students are held. In addition, homeless students may not be separated from the mainstream school environment.

#### **IDEA**

The Individuals with Disabilities Education Act (IDEA) is a law that makes available a free and appropriate public education to eligible students with disabilities throughout the nation and ensures special education and related services to those children. The IDEA governs how states and public agencies provide early intervention, special education, and related services to eligible infants, toddlers, children, and youth with disabilities. Infants and toddlers, birth through age 2, with disabilities and their families receive early intervention services under IDEA Part C. Children and youth ages 3 through 21 receive special education and related services under IDEA Part B.

\*Randolph County Schools has a separate Procedures Manual for Special Education

<u>Elementary and Secondary School Emergency Relief (ESSER) Act, which includes the American Rescue</u>

Plan (ARP Act)

The American Rescue Plan (ARP) Act was signed into law by President Joe Biden on March 11, 2021, to speed up the United States' recovery from the economic and health effects of the COVID-19 pandemic and the ongoing recession. ARP ESSER funds will allow SEAs to take additional steps to reopen schools for in-person instruction, keep them open safely, and address the disruptions to teaching and learning resulting from the pandemic.

# **Monitoring of Federal Programs**

The Georgia Department of Education requires that Randolph County School District monitor the implementation of all Federal Programs and the expenditure of all funds associated with those programs. Monitoring is a vital part of Federal Programs. Monitoring is a process of systematically providing technical assistance and providing data and related documentation in order to guide program implementation, evaluate program outcomes, and improve program goals and objectives.

The following programs are monitored by the Randolph County School System:

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

Title I, Part A—School Improvement 1003 (a)

Title I, Part C- Migrant Education Program

Title II, Part A – Teacher and Leader Effectiveness

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

Title IV, Part A - Student Support and Academic Enrichment (SSAE)

Title V, Part B— Rural Education Initiative

Title IX, Part A - McKinney-Vento Education of Homeless Children and Youth Elementary and Secondary School Emergency Relief (ESSER) Act, which includes the American Rescue Plan (ARP Act).

The specific requirements for each of the Federal Programs listed above are as follows:

- LEA will conduct continuous self-monitoring of its schools and programs to ensure compliance with Federal Program requirements.
- Federal Programs Directors' self-monitoring will include monitoring all program expenditures to verify that all program expenditures comply with Federal Program requirements.
- Federal Programs Director will undergo training from GaDOE and other sources to maintain proficiency in Federal Program compliance requirements.
- Federal Programs Director will provide technical assistance to local schools.
- Federal Programs Director will maintain all documentation LEA may need for future auditing/monitoring.
- In years when LEA does not receive an on-site visit, Federal Programs Director will complete the Self-Assessment Monitoring Checklist (provided by GaDOE).
- LEA will undergo monitoring by GaDOE on a four-year cycle. Federal Programs Director will
  participate in training and technical assistance updates as provided by GaDOE prior to
  monitoring visit.
- Following GaDOE monitoring, the LEA will receive a comprehensive monitoring report containing recommendations, findings, and required actions. Such recommendations, findings, and required actions will be addressed in a timely manner through the Corrective Action Plan, to

be approved by GaDOE. The program director/principal or designee will monitor implementation of the corrective action plan.

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

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

The following procedures are followed for the on-site monitoring visit: Selection of LEA's to be monitored:

- LEAs are currently cross functionally monitored on a four-year cycle.
- LEAs were initially randomly selected from each of Georgia's service areas.
- LEAs with audit or monitoring findings requiring a return of monies or receiving a high number
  of stakeholder complaints are monitored within the year of the LEA audit or monitoring report
  and the written complaint. In addition, on-site monitoring outside of the scheduled cycle may be
  arranged as needed if an LEA notes serious or chronic compliance problems.

## **LEA Monitoring**

Critical to the monitoring process is the feedback provided to schools that can assist in improving student academic achievement. District monitoring addresses the following:

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

#### **LEA Positions Responsible for Implementation and Monitoring of Procedures**

The Federal Program Director, Parent and Family Engagement Coordinator/Homeless Liaison, School Improvement Specialists, Professional Learning/Curriculum Director, Special Education Director and Chief Financial Officer will develop and implement the monitoring procedures contained in this handbook.

#### **Communication and Monitoring**

Monitoring of Federal Programs supporting schools is an on-going process. Two-way communication is established between the central office and schools to maintain an open line of communication. The Federal Programs Director and principals communicate through means of e-mail, phone calls, and site visits. During the summer prior to the beginning of the new school year and after the Annual Federal Programs Conference in June, the district Federal Programs Director convenes a meeting of all Title School principals during a summer orientation. Principals receive training on policies and procedures and guidance for operating a Title Program.

Principals are given detailed information of program expectations and program guidance. Specific training is provided in all facets of Federal Programs. Information shared with principals includes details related to timelines, budget forms, inventory information, schoolwide implementation protocols, parental involvement, and other areas of Federal requirements as appropriate. Monthly leadership team meetings are also held with principals. All concerns related to federal programs and/or program implementation is discussed at this meeting. In addition, emails, staff meetings, and phone conversations take place throughout the year as a means of providing on-going monitoring and communication with each Title I school.

At the beginning of each school year at the district's countywide meeting, a federal programs overview is held that reviews the purpose of all federal programs as well as expectations and procedures related to reasonable, necessary, allocable, and allowable use of funds: reasonable (withstand public scrutiny), necessary (based on the SIP as driven by student data), allocable (related to the federal award), and allowable (can be assigned to a category of the grant).

# **Monitoring Timeline**

# June/July

Attend federal programs conference

Provide Summer Workshop and updates for all Title I Schools following the Annual Federal Programs Conference to update principals on any new guidelines and to provide guidance for new Title I principals.

Work with principals on annual revision of compacts, school comprehensive needs assessments, school improvement plans, parent engagement plans and budgets.

Use assessment data and input data gathered in the spring to complete Comprehensive Needs Assessment

Review/revise CLIP based upon collaboration with federal programs and input from stakeholders and submit in SLDS

Complete DIP Progress Monitoring in SLDS

Review/analyze results of standardized assessments

Complete after-the fact periodic certifications for principals to review and sign

Conduct Fraud, Waste, Abuse, Corruption, Complaints and Code of Ethics Trainings for all personnel

Review/revise policies as needed for update to Federal Programs Handbook

# **August**

Provide technical assistance on federal program documents (school improvement plans, Parent and Family Engagement Plans, and compacts)

Identify homeless and foster care students and provide needed services

Present the CLIP (including District Improvement Plan) to stakeholders (including the Board of Education)

Review SIPs and request revisions as needed

Participate in new teacher orientation

Review detail expenditure reports for federal programs

Begin developing federal program budgets

Collect Occupational and Language Surveys to determine students eligible for EL and MEP programs

Assist schools with creating and sending any parent notifications

# September

Attend Schools' Annual Title I Meetings

Provide Technical Assistance for School Improvement Plans, budgets, and federal program requirements (as needed)

Begin Continuous Improvement Team (CIT) and DDI (Data Driven Instruction) Meetings at schools

Review SIPs and request revisions as needed.

Discuss budgets with principals and develop budgets based upon

federal program documents (Equity Plan, Needs Assessment, Schoolwide Plans, and CLIP)

Submit budgets and required documentation through Consolidated Application

Revise budgets based upon GaDOE program specialists' feedback (if needed)

#### October – March

Review detailed expenditures

Review purchase order requests to ensure alignment with specific federal program documents (Needs

Assessment, CLIP, Equity Plan, school improvement plans, budget) and are allocable and allowable for the specific federal program

Send out invitations for private school consultation meeting for participation in federal programs for the following school year

Complete Neglected and Delinquent Survey and other surveys/reports as required by the state

Complete DIP Progress Monitoring in SLDS (January)

Work with Finance Department on Completion Reports (October)

Complete budget amendments as necessary

# April/May

Gather information and conduct Comprehensive Needs Assessment

Provide Technical Assistance for Parent and Family Engagement Plans; Compacts; budgeting; summer programs

Conduct district wide Parent Survey to gauge the effectiveness of parental involvement activities

Invite Stakeholders to District CLIP and Parent Input Meetings and hold meetings

Prepare and submit budget amendments as needed

# **Ongoing**

Provide technical assistance and meet regularly with principals

Review detail expenditures

Participate in federal programs webinars, conferences, regional meetings, and trainings

Hold District-Level Meetings as scheduled: Continuous Improvement Team (CIT) every two weeks; Principal Meetings monthly; Data-Driven Instruction (DDI) quarterly.

Conduct school visits and walkthrus to observe federal program and budgeted professional learning

Ensure that budgets are reviewed by program coordinator and financial officer monthly. Ensure that each purchase order is examined by federal programs staff to ensure purchases are allocable, reasonable, and necessary and that items purchased are supporting strategies contained in the district and/or school improvement plans.

Review monthly Personnel Activity Reports (PARs) and submit to superintendent for approval

Collect and submit timesheets to payroll (from teachers participating in extended learning activities)

#### **On-site Monitoring**

All Title schools are subjected to on-going monitoring by the Federal Programs Director throughout the school year. The Director will conduct a formal on-site monitoring of all schools at least once per year to ensure compliance with Title guidelines. During these formal site visits, the principal, along with any individuals working with the federal budgets and/or Title program initiatives, meets with the director to review all pertinent information. This visit allows the director to work one-on-one with principal to correct any finding and answer any question the school administrator may have. Classroom visits and observations of federally funded employees are also made during site visits. Feedback will be provided to the principals via checklists at debriefing conferences. In addition, emails, staff meetings, and phone conversations take place throughout the year as a means of providing ongoing monitoring and communication with each school. Also, district walkthroughs are conducted monthly. Other on-site monitoring includes visiting classrooms, leadership team meetings and meeting with school personnel regarding technical assistance. These site visits happen throughout the school year.

#### **Data Review**

Data is compiled, reviewed, and discussed during district -led bi-weekly CIT meetings (facilitated by the Federal Programs Director/Assistant Superintendent), DDI (PLC) Meetings, District Leadership Team Meetings (facilitated by the Superintendent), Local Governance Team meetings, and at the Board of Education meetings (when appropriated). Principals review data with their leadership teams to identify and address areas in need of improvement. All schools have secured data rooms that are used during the data analysis process. School leaders discuss this information with all staff to ensure they fully understand the data presented.

#### **Documents to Verify Monitoring of Federal Programs**

Program Coordinators and specialists document meetings with school leaders using sign-in sheets, checklists agendas, and meeting notes. Regular meetings and/or communication will occur to review required documents and offer technical assistance. Emails, sign in sheets, agendas, and/or minutes will be used to verify monitoring has occurred. A Federal Programs School Monitoring Checklist will be maintained and reviewed with school leaders indicating that required program components have been met.

#### Needed Corrective Actions at Schools (as identified by the LEA)

Schools that receive notification or are contacted by Federal Programs Offices of any fiscal or programmatic actions needed, are required to implement corrective action. Notification may include but is not limited to: corrections necessary to expenditures including payroll; inventory control and maintenance; deviations from or non-compliance with the procedures established by the Randolph County School System and Federal Programs; or corrective actions listed within the Federal Programs School Monitoring Checklist must be addressed by school leaders as a result of technical assistance provided by federal program coordinators and other district leaders. Professional learning is provided based on needs. In addition, professional learning is used as a preventive measure to ensure that all personnel have a clear understanding of all expectations for every facet of the various federal programs. The Federal Programs Director, along with other district level staff and outside consultants, provide ongoing training as a means of ensuring that the system and schools are in compliance at all times. A reasonable timeline for addressing corrective actions will be agreed upon by school and district leaders

and adhered to by all parties.

The Federal Program Director or designated staff will provide technical assistance and guidance through phone or email contact, meetings with schools, and collaboration to ensure schools implement necessary steps to monitor corrective action and to resolve findings or irregularities.

#### **Verification of Corrective Actions at Schools**

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

#### **Review of Budgets (Development)**

Budget planning begins in February/March with district and building level administrators, based on needs for the upcoming school year. The team meets to review the need for personnel at the building level and system level. In June/July, the Title I Director prepares a yearly budget, based on needs identified in the Comprehensive Needs Assessment, showing the distributions for district and per school. Directors will enter budgets into the Consolidated Application, submit them to GaDOE, and make amendments as needed. Randolph County School System currently consolidates funds.

#### **Consolidation of Funds**

The Randolph County School System consolidates Federal funds with local and state funds. The funds are allocated as district set asides and to the school level. The school level allocations will be generated based on the Federal guidance and approved by GaDOE. School allocations will support the School Improvement Plan and will meet the Intent and Purpose of each Federal Program.

#### **Monitoring Intent and Purposes**

The Title I Director reviews the fund 150 expenditure report with the finance department quarterly. These reports reflect the school expenditures representing the intent and purpose of each consolidated program. If the school(s) is/are not expending the funds to meet the intent and purpose of the consolidated program, the Title I Director will discuss with the school administrator and determine cause. The Title I Director and school administrator will work on making sure expenditures are meeting the intent and purpose of the consolidated programs.

#### **Technical Assistance**

Technical Assistance is given to schools and districts throughout the year through meetings, emails, phone communications, memos and school visits. The goal is to assist schools identify priorities in instruction, professional learning, and effective budgeting. Prior to the start of school, a principal's meeting is held to review the purpose of all federal programs, as well as expectations and procedures

related to allowable use of funds. The Federal Programs Director maintains documentation related to the monitoring of federal programs in the schools. Documentation will include: Checklists, meeting agendas, sign-in sheets, meeting notes, emails/memos and observation data. There is consistent ongoing monitoring after trainings are conducted to ensure effective implementation of Title programs. The primary means of technical assistance and monitoring the schools occurs at district-led meetings for schools. The three types of district-led meetings for school are:

#### CIT/Continuous Improvement Team—Meets every two weeks

CIT meetings ensure that support provided to schools is streamlined, aligned to school improvement plans and short-term action plans. Through a standing agenda, these meetings provide a vehicle for ongoing, consistent communication between the school and district.

Focus: School Improvement/ Individual Schools

**Audience:** Principals, Asst. Principals, Academic Coaches, and School Improvement Specialists/MTSS Coordinators

\*Model taken from GaDOE Division of School and District Effectiveness

#### <u>DDI/Data Driven Instruction</u>—Meets quarterly

These meetings serve as our Professional Learning Community (PLC). The purpose of DDI meetings is to develop, implement and monitor our systemic process/framework for data-driven instruction that fosters student, teacher and leader growth.

Focus: Student achievement/ Data

**Audience:** Principals, Asst. Principals, Academic Coaches, and School Improvement Specialists/MTSS Coordinators

#### **Principal Meeting—Meets monthly**

Provide opportunities for 1) intentional, planned, coherent and aligned support of school and district initiatives/work AND 2) structured collaboration among school and district leaders AND 3) collaborative professional learning opportunities.

Focus: LKES (Leader Keys Effectiveness System) and Leader Collaboration & support

Audience: Principals, Asst. Principals, and School Improvement Specialists/MTSS Coordinators

#### **Monitoring/Identifying High Risk Schools**

Randolph County School District's Program Coordinators initially identifies high risk schools by a review of CCRPI Scores. Schools that have the lowest scores or show evidence of declining scores are considered high risk for Randolph County. 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.

#### Procedure for English Learners and Immigrant Enrollment and Identification

The Randolph County School System has the following procedures in place to enroll, identify, serve, assess, and monitor English Learners (Els) and immigrant students.

- 1. The Home Language Survey is disseminated to each school registrar to include in the enrollment packets for the school year and imbedded in the Infinite Campus Online Registration.
- 2. Each year, parents will complete the Home Language Survey for each student enrolled in the Randolph County School System.
- 3. The Home Language Survey is collected and reviewed by the school registrar/counselor. Any student who answers anything other than "English" on any of the three questions, will be referred to the System's ESOL Coordinator.
- 4. The District ESOL Coordinator will test the student using the appropriate screener, if not previously identified as EL, to determine eligibility for ESOL services within the first month of school starting or within the first two weeks upon enrollment if enrolled later in the school year.
- 5. If the student qualifies for ESOL services based on the screener, the ESOL Coordinator will notify the parent in writing and meets with the school counselor and EL teacher to ensure that services begin immediately. Parents have the right to remove their child from the ESOL Program or decline ESOL services or request a waiver.
- English Learners are assessed annually on the state-adopted English proficiency measure, ACCESS (Assessing Comprehension and Communication in English State-to-State) to determine continued eligibility.

#### Procedures for Parent Notification for Eligibility for ESOL Service/Parent Waiver

The Randolph County School System has the following procedures in place to notify parents of eligibility of ESOL services/Parent Waiver:

- If the student qualifies for ESOL services based on the WIDA Screener, the ESOL Coordinator will
  notify the parent (Parent Notification of Initial Eligibility for English for Speakers of Other
  Languages (ESOL) Services). Parents have the right to remove their child from the ESOL program
  or decline ESOL services by requesting a waiver of services.
- English Learners are assessed annually on the state-adopted English proficiency measure, ACCESS (Assessing Comprehension and Communication in English State-to-State) to determine continued eligibility.
- Once ACCESS scores are received, the ESOL Coordinator will share the assessment results with
  parents at an ESOL parent meeting or if parents are unable to attend the meeting, the ESOL
  Coordinator will make a home visit to discuss results of the assessment.
- 4. At the beginning of each school year, the ESOL Coordinator will send the Parent Notification of Continuation of Student Eligibility for English for Speakers of Other Languages (ESOL) Services or Exit Letter, if applicable, to inform parents of student services.
- 5. For ESOL students receiving supplemental services (Title I), the ESOL Coordinator will send the Title I Parent Notification of Student Eligibility for Supplemental Language Support Services to parents no later than 30 days from the beginning of school or within 10 days of supplemental

- language support services beginning.
- 6. The ESOL Coordinator will also meet with counselors and/or the SIS Coordinator to ensure students are coded properly.

# Section 2: Consolidated LEA Improvement Plan (CLIP)

#### **Procedures for Creating, Reviewing and Approving the CLIP**

Randolph County School System begins its process for strategic planning towards academic achievement with the Consolidated LEA Improvement Plan (CLIP). The district utilizes a variety of data sources to make decisions that will affect student learning and teacher effectiveness. Our needs assessment process includes examining student achievement data, perception data from stakeholder surveys, professional learning plans, teacher recruitment and retention data, highly effective teacher, teacher infield, and paraprofessional data, class size data, LKES, TKES data, and verbal input from stakeholders. In the spring, a district CLIP/Parent Input meeting held. Also in late spring, each school begins gathering input for their Comprehensive Needs Assessment. Information is gathered from all stakeholders including: parents, teachers, paraprofessionals, administrators, community members, Local School Governance Team members, and other support staff. Once the input is collected from the schools, a series of meetings are held at the school and district levels to consider all the prior stakeholder input and data and to make decisions regarding prioritized needs and equity concerns. All parents of Randolph County School System's students are provided multiple opportunities to be involved in the development and revision of the system's CLIP. These opportunities include access to the components of the CLIP on the district website, with an option to provide input there as well. After all of the input is received and data analyzed, the district completes the comprehensive needs assessment and district improvement plan in SLDS . The results of this needs assessment determine any prioritized areas of need/inequity and guide the development of the various documents that make up the Consolidated LEA Improvement Plan (CLIP).

#### **Guidance to Schools/Departments**

All components of the CLIP are required prior to the district receiving funding from federal programs. CLIP revisions take place annually using prior year data and needs assessment information. The CLIP serves as the plan detailing coordination of various federal programs and identification of needs and in- turn budgeting for such needs with federal funds. The CLIP includes the following components: 1) district CNA report; 2) district improvement plan; 3) comprehensive parent and family engagement plan; 4) foster care transportation plan; and 5) Title I, Part C identification and recruitment plan (not required for Randolph County). Department directors, specialists, school leaders, as well as community and parent stakeholders are involved in the revision process. Stakeholder input is examined and considered from surveys and various stakeholder meetings. Documentation includes sign-in sheets, agendas,

meeting minutes, emails, survey responses and returned plans with comments. Copies of comments are kept on file and put in meeting minutes. The Federal Program Director gathers all input and updates the various components of the CLIP. The plan is submitted to the Superintendent for final approval.

#### Selection of Evidence-Based Action Steps/Interventions in CLIP

Randolph County School System has adapted the GaDOE's Systems 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 and Evaluate. The district will create goals and evidence- based action steps to address the prioritized overarching areas in need of improvement in SLDS. The district must include in the District Improvement Plan the extent to which the interventions are evidence based by selecting Strong, Moderate, Promising, or Rationale and linking to appropriate supporting documentation. The district focuses on three to four goals with high impact action steps that will improve Tier 1 instruction for all students, as well as identify Tier 2-4 action steps that will be taken to provide additional support for students.

#### **Review and Approval Process**

Randolph County School System encourages participation from parents and community stakeholders in the development, implementation, review and evaluation of its Consolidated LEA Improvement Plan (CLIP). All parents of Randolph County School System's students are provided multiple opportunities to be involved in the development and revision of the system's CLIP. These opportunities include access to the components of the CLIP during various meetings and events. Once the CLIP has been completed in SLDS, all district coordinators and program directors are provided the opportunity to review and make any final changes before the Federal Programs Director submits the CLIP to the Superintendent. The Superintendent submits the CLIP to the Georgia Department of Education for approval.

#### **Resolution of Unapproved Plans**

If the GaDOE requests revisions to any portion of the CLIP (Comprehensive Needs Assessment, Equity Plan, District Improvement Plan, Comprehensive Family and Parent Engagement Policy, Foster Care Transportation Plan), the Federal Programs Director will retrieve the requested changes from the SLDS portal. The Federal Programs Director will communicate with the appropriate school or district-based personnel to ensure that the requested changes are completed. The Federal Programs Director will provide technical assistance as appropriate, make corrections and/or approve corrections to the appropriate CLIP component and resubmit the plan to the Superintendent who will submit it to GaDOE. This process is continued until the system's CLIP has been approved by the GaDOE.

# Schoolwide /School Improvement Plans

School Improvement Plans (SIP) are updated annually and are developed each summer for the following school year. Each school's leadership team meets during the spring/summer and leads the SIP development effort. The team is composed of representatives from grade levels, content areas, and departments, as well as administration and parents. Although parents do not attend all of the internal planning meetings, they are an integral part of the process. During the meetings, the teams use a problem-solving approach to address the needs of the school. Data is analyzed to identify strengths and weaknesses and develop solutions to challenges found during the data analysis. The focus is to serve the whole child with a fine lens on the Five Systems of Continuous Improvement and how each system impacts student achievement. The Schoolwide Improvement Plans are created with stakeholders' input and finalized in SLDS. The principals and school improvement specialists facilitate the schoolwide improvement planning meetings. The required components are submitted to the Federal Program Director to review. The School Improvement Specialist and the Federal Program Director will review this portion of the plan with the Schoolwide Program Checklist for required components and provide feedback and/or revision requests. School leadership teams will reconvene and revise the plan and send the revised plan back to the Federal Program Director. The plan is reviewed to ensure all requested amendments have been made. The Federal Programs Director approves the plan in SLDS, and the plan is added to the system and schools' website. Paper copies are also available in the main office at each school. The School Improvement/Schoolwide Plan is a working document that can be amended throughout the school year as the need arises.

#### **Evidence-Based Practices**

Randolph County Schools implement activities, strategies, and interventions that are evidence-based. Evidence-based practices and interventions demonstrate a significant effect on improving student outcomes or other relevant outcomes based on the following:

STRONG evidence	At least on well-designed and well-implemented experimental study.	
MODERATE evidence	Moderate evidence from at least one well-designed and well-implemented quasi-experimental study	
PROMISING evidence	At least one well-designed and well-implemented correlational study with statistical controls for section bias	
A Logic Model may be used to demonstrate a retional based on high quality research findings or		

A Logic Model may be used to demonstrate a rational 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.

School leadership teams consider the extent to which the activities, strategies, and interventions contained in their school improvement plan (SIP) meet the various levels of qualifying as being evidence based: STRONG, MODERATE, PROMISING, or Logic Model rationale for improving student outcomes.

#### **Implications**

The following tools are used to determine the level of evidence associated with the activity, strategy, or intervention: What Works Clearinghouse, Best Evidence Encyclopedia, and/or Evidence for ESSA. While schools are encouraged to adopt evidence-based strategies, documentation is not required as all schoolwide programs participate in the consolidation of funds initiative.

#### **Section 3: Private Schools**

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

Section 1117 of ESEA requires that local educational agencies (LEA) provide to eligible private school students, their teachers, and their families, services that are equitable to the services being provided to similar students, their teachers, and their families, attending public schools. Services for private school students must be developed in meaningful consultation with private school officials. Services provided to private school students by an LEA must be secular, neutral, and non-ideological.

#### Private School Eligibility for Participation in Equitable Services

Under Georgia law (20-2-690), private schools will notify the Randolph County School System's social worker within 30 days of the beginning of the school year of the enrollment of students who reside in the LEA using the GaDOE DE1111 form. The district's social worker is responsible for the upkeep of this data and submits the information to the Data clerk and the Title I Director.

#### Eligible private school children

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

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

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

Attend a private school within the district's geographic boundaries
 Federal support services for these children must be developed in meaningful consultation wit

Federal support services for these children must be developed in meaningful consultation with private school officials

#### <u>Private School Notification Requirements</u>

To ensure meaningful consultation occurs, invitations for private schools to consult in the participation of federal programs the following calendar year are sent in the fall via ES4PS (Eligible Services for Private Schools) in SLDS. The invitation includes the specific date and time of the initial consultation. Private school officials will receive a link to respond to the invitation. The Title I

Director and all other directors/coordinators related to Federal programs must participate in the meeting. Upon receipt of an intent to participate, a meeting will be held to discuss plans and the required components of 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). Follow-up consultation meetings are then scheduled with officials from participating private schools. Documentation will be maintained in the Title I Office.

#### **Private School Consultation and Planning**

The goal of consultation is to develop an agreement between the LEA and appropriate private school officials on how to provide equitable and effective programs for eligible private school children. (ESEA Secs. 1117(b)(1) and 8501(c)(1), (5).) Sec. 1120(b) of the Elementary and Secondary Education Act and Sed. 200.36 of the Title I regulations require that timely and meaningful consultation occur between the local education agency (LEA) and private school officials prior to any decision that affects the opportunities of eligible private school children, teachers, and other educational personnel to participate in programs under this act. Consultation shall continue throughout the implementation and assessment of activities under this section.

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

- 1. How the children's needs will be identified;
- 2. What services will be offered:
- 3. how, where, and by whom the services will be provided;
- 4. how the services will be assessed and how the results of the assessment will be used to improve those services;
- 5. the size and scope of the equitable services to be provided to the eligible private school children, teachers, and other educational personnel, the amount of funds available for those services, and how that amount is determined;
- 6. how and when the agency, consortium, or entity will make decisions about the delivery of services, including a thorough consideration and analysis of the views of the private school officials on the provision of services through potential third party providers; and
- 7. whether the agency, consortium, or entity shall provide services directly or through a separate government agency, consortium, or entity, or through a third-party contractor;
- 8. administrative costs;
- 9. the method/sources of poverty data used; (Title I only)
- 10. when services will be provided (Title I only); and
- 11. whether to provide equitable services to eligible private school children—
  - a. by creating a pool or pools of funds with all of the funds allocated under subsection (a)(4)(C) based on all the children from low-income families in a participating school attendance area who attend private schools; or
  - b. in the agency's participating school attendance area who attend private schools with the proportion of funds allocated under subsection (a)(4)(C) based on the number of children from low-income families who attend private schools. (ESSA 8501(c)).

#### **Private Schools: Determining Allocations**

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

#### **Complaints**

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

Complaints by the private school related to equitable services for Title I, the official shall provide the basis of the noncompliance by completing and submitting the Complaint Form found on GaDOE's State Ombudsman's website. The private school official must provide the basis of the LEA's noncompliance. Also, the LEA must forward the appropriate documentation to the Ombudsman in response to the complaint. The Ombudsman will provide a written resolution to a complaint within 45 days (Sec. 8503(a)).

# **Section 4: Fiduciary Responsibility**

#### **Maintenance of Effort**

GaDOE compares the fiscal effort of the preceding year to the second preceding fiscal year and makes the maintenance of effort determination available to the system through a marked "met" or "unmet" on the consolidated application.

The calculation in the GaDOE portal determines which funds should be excluded from the calculation. Documentation for MOE is only required for districts that do not meet the required maintenance of effort. Program Coordinators will pull the MOE information from the Consolidated Application each school year for documentation purposes.

#### Comparability

Randolph County School District is not required to meet comparability because there are no overlapping grade spans in the District. However, the Federal Programs Director completes the comparability form each year in the GaDOE Portal to verify that there are no over-lapping grade spans in the district, therefore making the district exempt. Randolph County complies with all comparability requirements and implements the procedures annually. After the Federal Programs Director completes the form in the consolidated application, the Superintendent verifies the comparability status.

## **Assessment Security and Reporting of Accountability**

The Randolph County School System conducts the assessment program as required by federal and state

law. Randolph County School System interacts with state and federal agencies relative to the assessment program and accountability mandates. RCSS takes the ethical responsibility to provide secure and appropriate testing environments for its students very seriously. In any state or federally mandated test RCSS expects its employees to act in accordance with specific guidelines mandated by the test and the general guidelines of the Georgia Department of Education. For every administration of a high stakes assessment the following guidelines will be followed.

- The System Test Coordinator, as well as School Test Coordinators, handle assessment documents and reports including secure test materials, individual student score reports, and school/district data reports in both paper and electronic formats.
- Randolph County School System delivers training/guidance related to the assessment program, assessment data, and accountability mandates to all stakeholders.
- The district assessment calendar is shared with each school test coordinator, and instructional
  coach, as well as is posted on the school website. Each school shares testing dates with their
  parents and students using various methods ClassTag Notices, School and District Website, etc.
- Preliminary individual student test reports are shared with parents when permitted by the GADOE Assessment Policy.
- The single-page District Test Security Plan, as well as the EOG/EOC assessment calendar, is posted on the district website.

#### **Materials**

- All school testing coordinators must have a sign-in sheet for documentation of teacher and proctor participation.
- GaDOE updates provided, on each test being administered, will be provided as a reference/resource for school testing coordinators.
- A District Meeting held with school testing coordinators to indicate any special requirements from the district.
- School Coordinator's Manuals and Examiner's Manuals are usually available on the GaDOE's
  website. Please use these manuals to assist in training. All manuals must be kept secure and
  accounted for after each use.
- School Coordinators should refer to the Roles/Responsibilities for all individuals being trained from the GaDOE Student Assessment Handbook including but not limited to: coordinator, principals, examiners, and proctors.
- Training covers each group's roles/responsibilities as documented on the sign-in sheets. Examiners and Proctors sign acknowledging responsibilities for testing.

#### **Topics**

- Arrangement of delivery of materials (if applicable) by the System Test Coordinator to the school coordinator.
- The System Test Coordinator and School Test Coordinator check the shipment for accuracy of the delivery for GAA and the roster uploads and accommodations for GAMS EOG/EOC and ELL Access online testing.

- Make checks of confirmations and notations of inaccuracies. The materials list is initialed and dated with both parties retaining a copy.
- In order to maintain the integrity of the assessment program and its results, security must be established and maintained.
- The responsibility of the assessment program at the school level rests with the principal and their designated school test coordinators.
- School Coordinators use the Student Assessment in Georgia Schools (PSC document) to discuss the testing ethics and consequences of violations.
- Examiners sign and date a copy of these guidelines.
- School Coordinators use the Examiner "Must Do" page from the GaDOE's Student Assessment Handbook as a part of the training at the school level.
- School Coordinators are trained in using the forms required from the GaDOE Student Assessment Handbook.
- School Coordinators are responsible for ensuring proper coding of test documents/online profiles.
- School Coordinators are responsible for checking the accuracy of student information.
- School Coordinators are required to have test examiner's sign materials in and out each day during test administration.
- Proctors are used when required. All test proctors are trained on their roles/responsibilities.
- Testing Procedures are clearly articulated to ensure a smooth and problem-free test administration.
- Schedules, groups and location assignments, and special directions are distributed and explained before testing administration by the School Test Coordinator.
- Accommodations are well documented by the Special Education Department.
- School coordinators carefully check to ensure students are provided the appropriate and accurate accommodations for each individual test.

#### **Collection of Materials**

- Sign-in and Sign-out sheets are used to document who is responsible for all testing materials received.
- Before testing documents are returned to the System Test Coordinator, the school coordinator carefully accounts for all materials.
- Once the materials are re-counted by the Director of Assessment and the School Testing Coordinator, the materials are packaged for delivery, for GAA.
- Principal Certification Sheets are required on all standardized tests. This document must be returned at the time of delivery of the testing materials.

#### **Online Testing Protocol**

To access online state-mandated assessments Internet Security, Security of Test Materials, and Online Content, local education agencies (LEAs) and schools are required to use a secure platform. It is imperative the LEA testing and technology staff work closely together to prepare devices appropriately for online assessments. Online tests contain secure test data, copyrighted content and

confidential student records. Therefore, test administrators, proctors, technology staff, and students must follow rules and procedures that ensure online content is not made available to anyone for any other purpose than to conduct the test. Users must not access the test and then leave a computer or tablet unsupervised. Locally stored off-line content (e.g., cookies, cache) must be cleared or secured after accessing the test so malicious applications or users cannot gain access to secure test materials.

Additionally, LEAs/schools must have acceptable use policies that include detailed provisions addressing state online testing security and student/parent consequences for tampering and violation.

Best practices for password protection include, but are not limited to, the following:

- Never share passwords with anyone. User accounts are confidential
- If passwords must be written down on a piece of paper, store the paper in a secure place and destroy it when it is no longer needed.
- Change passwords immediately if they have been compromised
- Be careful where passwords are saved on computers and tablets.
- Some dialog boxes, such as those for remote access, present an option to save or remember a password.
- Selecting this option poses a potential security threat.

#### Procedures for Distribution and Collection of Chromebooks and Test Tickets for Online Testing

- Chromebooks for online testing will be signed out each morning from the School Testing Coordinator at a designated time.
- A Sign-In/Sign-Out sheet will be provided for each set of testing materials. An actual count should be checked against the Sign-In/Sign-Out sheet before and after testing.
- Each day, the testing committee members should sign out all test materials and mark them as returned. Only designated personnel, examiners/teachers administering the tests, will be allowed to pick up and return materials, including test tickets, Chromebooks, and carts.
- All testing materials (rosters, test tickets, and manuals) will be signed in and out each day by examiners/teachers.
- In case of discrepancies in the counts, a written explanation from the School Test Coordinator will be required.
- All testing materials will be securely stored in the school's testing vault.
- Each School Test Coordinator should maintain Sign-In/Sign-Out log sheets for Georgia Milestones EOG/EOC test ticket distribution for online testing.

#### **Special Education Students and the Testing Environment**

- Special education students will be tested according to their Individualized Education Plans (IEPs).
- Special Education Director and school test coordinators sign into the assessment system application and review accommodations or supports assigned to all students to ensure the listed accommodations match what's documented in the student's IEP. Check that accommodations

- were assigned well before the assessment. Keep a record of your checks and any changes made. Ensure the test environment is ready to provide the approved accommodations. Make sure staff members know about the accommodation. Keep parents informed about accommodations.
- Identify which students need testing accommodations based on their plans or documented disabilities. Write down the accommodations each student requires in their plan. Tell the teacher and test administrators about the accommodation and train them on how to provide.
- Make sure the right accommodation is given to each student on test day. Watch to ensure students receive their accommodation as planned.
- The test coordinators and technology coordinators decide when the assessment will happen. System Test Coordinator tells Tech coordinator what is needed for the tests. Tech coordinators see if the school's computers and internet are ready for testing. Tech tests everything to make sure it works. On test days, tech people are there to fix problems quickly.
- The district plan for technology and device readiness decide what schools need for computers and internet. Decide what each school wants to achieve with technology within the school. Talk about how to pay for computers and internet. The plan will address how to buy, give out and take care of the computers. Train teachers to use technology in their classes. The plan tells how to keep students' information safe and protect against computer problems.

#### **The District/School State Report Card**

ESSA provides for Reporting Requirements. The following ESSA reporting requirements are available on GOSA's Report Card:

- State assessment data for mathematics, reading/language arts, and science, disaggregated by subgroup;
- Four- and five-year high school graduation rates, disaggregated by subgroup;
- Dropout and school completion data;
- Performance on indicators of school quality and student success, disaggregated by subgroup;
- Progress towards interim and long-term goals, disaggregated by subgroup;
- Assessment participation, disaggregated by subgroup;
- Measures of school climate and safety;
- Preschool enrollment;
- Teacher credentials and experience levels, disaggregated by high-poverty and low-poverty schools;
- Per-pupil expenditures, disaggregated by funding source; and
- Alternate assessment data for students with the most significant cognitive disabilities.

The District/School State Report Card provides an explanation of the information presented in the school letter grade reports. Most of the information comes directly from the Georgia Department of Education's College and Career Ready Performance Index (CCRPI). The District/School State Report Card is located for public access on district and school level websites. The Title I Director will work with the Technology Director to ensure that the appropriate link for the school report card is posted on the district website and the school level websites.

#### **English Language (EL) ACCESS Participation Rate**

Under the ESSA, all Grade K-12 students identified as English learners must take the ACCESS for ELLs English language proficiency (ELP) assessment annually, including students whose parents have waived ESOL services, and including EL students with disabilities. Section 1111(b)(2)(G); 34 CFR 200.5(a)(2), 200.6(h)

The Randolph County School System strives to ensure that 100% of its English Learners are assessed annually with the WIDA ACCESS 2.0 or the WIDA ALT ACCESS. The District ESOL Coordinator tracks enrollment and reports enrollment information to the District Testing Coordinator which allows these two individuals to track all new enrollments of potential Els and Active Els into the District after the initial date of ordering testing materials in November and throughout the testing window. This helps ensure that Els are entered into the DRC testing site, that Els arriving during the testing window each year are verified as to the status of their testing in the previous district, and that all Els are scheduled for testing. The district testing coordinator is responsible for collecting the justification reasons if the percentage falls below 95%.

## **Consequences for Violations Related to Assessment Security**

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

#### Section 427 General Education Provision Act (GEPA)

Randolph County School District will continue policies and practices that provide for barrier-free programs. Randolph County Schools' compliance with Section 427 of the General Education Provision Act (GEPA) is based on these policies and adds program-specific requirements to continue to erase any possible barrier to promote inclusion and diversity. In particular, the school district and any subcontractors of the program will make efforts to improve access to parents and families through a variety of methods throughout the community. Further, Randolph County Special Education staff will ensure that special accommodations are made for persons with disabilities, teachers will provide program information in native language where available, and special care will be taken to assure benefits for both male and female participants.

# **Section 5: Internal Controls**

Randolph County School System operates federal grants in accordance with the Code of Federal Regulations.

# **Cost Principles**

#### Allowability Procedures (2 CFR 200.302(b)(7)

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

# <u>Financial Management and Authorization of Expenditures/Prior Approval of Purchases (and determine allowability)</u>

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

- Each budget, after prepared at the system or school level, is reviewed by the federal programs
  director to ensure alignment to system CLIP, school improvement plans (SIPs), and intent and
  purpose statements (for consolidated funds). Once the system or school makes the necessary
  changes, the budget is submitted to GaDOE for approval. Once approved by the GaDOE, the
  superintendent signs the budget and each department or school is given purchase orders to
  begin making purchases in accordance with the SIPs.
- 2. The requestor of a particular budget line item will first call or email the federal program director to get to ensure that the purchase is included in the School-wide/School Improvement Plan/Equity Plan and that the expense is allocable, reasonable, and necessary. The federal program director is responsible for authorizing expenditures and approves all purchases.
- 3. The requestor then completes a P.O.
- 4. P.O.s must include:
  - Complete vendor information including phone number (and fax number if applicable)
  - Ship to information including the address for the Central Office
  - Appropriate account number assigned by the program coordinator, principal or designee based on the budget sheets
  - Sufficient detail to determine if each cost item is allocable, reasonable, and necessary.
  - Signature of requestor
- 5. The P.O. is sent to the federal program director for a signature.
- 6. The federal program director then delivers it to the superintendent for a final approval signature.
- 7. After the PO is approved by the federal program director and signed by the superintendent, the order is placed. If rejected, a reason is provided to the originator of the requisition via email.
- 8. Goods are received by the federal program office. The federal program office compares the items received to the packing slip to compare what is received with what was ordered. The packing slip or invoice (if packing slip not available) is dated and initialed to indicate proper

- receipt of the items listed. Any disputes are reconciled between the program coordinator or bookkeeper and the vendor.
- 9. Items are disbursed to the appropriate person/school requesting the purchase.

#### Invoices

The following procedures will be followed for invoices:

- Vendor invoices are mailed/emailed directly to the central office and received by the bookkeeper. The bookkeeper compares the packing slip to the original invoice.
- The purchase order, packing slip (when available) and original invoice make up the voucher package. The voucher package is then delivered/forwarded to the Financial Officer, who reviews the documents for accuracy and verification before processing the payment in PCGenesis.

#### Payment of invoice

The following procedures will be used for payment of invoices:

- The Financial Officer charges the expenditures to the proper fund/program designated on the purchase order by the program director in PCGenesis.
- The Superintendent is responsible for authorizing payment upon appropriate documentation that the goods have been received and processing procedures have been followed.

#### **Supplement Not Supplant**

ESSA provides several fiscal requirements that are applicable to federal funding. Randolph County Schools will maintain the financial effort previously provided to Title I schools and may not use federal funds (except for Title I school allocations) to supplant or replace State or local funds. Randolph County Schools will provide services to Title I schools that are comparable to those of non-Title I schools. Funds received under this part shall be used to supplement, and not supplant, non-Federal funds that would otherwise be used for activities authorized under this part.

The following three-prong test will be used for Title II and Title IV in determining whether a fiscal expenditure supplements and not supplants:

- Test I Required is the program or activity that the district wants to fund required understate, local or another federal law? If it is, then it is supplanting.
- Test II Equivalency Were state and local funds used in the past to pay for this program or activity? If they were, it is supplanting.
- 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? If yes, then this is supplanting.

The Randolph County Schools may overcome this presumption, however, if it can demonstrate that there was a reduction in the amount of non-Federal funds available to the LEA to pay for the activity previously supported by non-Federal funds. The Federal Program Director will conduct an annual training for administrators. While the budget is developed and expenditures occur, the Federal Program Director will advise of cautious situations. The Principal will authorize with a signature all building level expenditures and it will be verified with signature by the Federal Programs Director and Superintendent. All district level expenditures will be verified by signature by the Federal Program Director and

Superintendent.

Supplement not Supplant is not a stipulation of ESSER (American Rescue Plan).

#### 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, and 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.

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.

All expenditures will be incurred during the approved budget 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.

#### **Resource Allocation Methodology Procedures (RAMP)**

ESSA provides several fiscal requirements that are applicable to federal funding. Randolph County Schools will maintain the financial effort in accordance to RAMP. Resource Allocation Methodology/Plan (RAMP) is an individualized and a locally developed document that explains how Randolph County School District plans to equitably allocate its State and Local funds to operate all the schools in the district. The Superintendent and the CFO will develop the financial document to ensure only expenditures that directly affect instructional practices in a school will be considered. No federal funds will be included in these calculations in order to allow the Randolph County Schools to demonstrate that it is meeting all supplement not supplant regulations in regards to dispensing federal funds.

#### Segregation / Separation of Duties (CFR 200.303)

Segregation of duties is crucial to effective internal controls and is maintained at the district office.

It reduces the risk to both erroneous, misuse, and inappropriate actions. Randolph County has sufficient controls to ensure no one person shall:

- Initiate a transition
- Process a transition
- Authorize a transactions
- Record the transactions
- Reconcile the balances
- Handle the assets
- Review the reports.
- Purchase Authorization. All expenditures must have prior approval for allowability by program

- directors and must follow system purchasing guidelines used by system finance office. School personnel request purchases and complete a Purchase Order. Purchase Orders are approved by the Superintendent and Federal Program Director.
- Expenditure Receipt-All purchases from the federal programs office will be delivered and receipt verified by district personnel. The packing slip is checked against the original PO to ensure the order is complete. If a packing slip is not available, the invoice will be signed as received.
- *Invoices* The invoices are then prepared for payment and submitted to the finance office for payment processing.
- Expenditure Payment- Once the Invoice and purchase order packet is forwarded to the Financial Officer; the expenditure is recorded in the accounting software with the appropriate account number. The Financial Officers process and print the checks prior to submitting to the Superintendent for final approval.
- Bank Reconciliation- The Finance Director prepares the monthly bank reconciliations which are reviewed and approved by the Superintendent.

#### **Procurement Procedures**

Randolph County procurement limits are within the federal guidelines regarding micro purchase, small purchase, sealed bids, competitive proposals, and sole source. The district conducts technical evaluations of proposals. With the collaboration of an outside consultant, bids are received and selected.

Method of Procurement	Purchasing Level	Summary
Micro Purchase	\$0 - \$10,000	Calculate dollar amount for each purchase order, must be equitable among suppliers, may be awarded without competitive quotes (CFR200.316, Edgar Pg. 119)
Small Purchase	\$10,001 - \$250,000	Quote must be obtained from at least 2 qualified sources.  Maintain documentation with voucher packet
Sealed Bids (formal advertising)	\$250,000+	Bids are solicited publicly, awarded to lowest price which conforms to all materials and conditions, must align with 2 CFR §200.319
Competitive Proposals	\$250,000+	Contracts are awarded based on alignment to the program based on price and other factors, must align with 2 CFR §200.319
Sole Source (Noncompetitive)		ONLY available from a single source, should be LIMITED.  Must align with 2 CFR §200.320(f)

To the greatest extent practicable, the County School System will provide a preference for the purchase of goods and materials produced in the United States (200.322).

#### Technical Evaluations of Proposals and Selecting Recipients (2CFR 200.320 (d)(3)

All contracts and all open market orders will be awarded to the lowest responsible qualified supplier. When bidding procedures are used, bids shall be advertised appropriately. Suppliers shall be invited to have their names placed on mailing lists to receive invitations to bid. When specifications are prepared, they will be mailed to all merchants and firms who have indicated an

interest in bidding.

All bids must be submitted in sealed envelopes, addressed to the Board, and plainly marked with the name of the bid and the time of the bid opening. Bids shall be opened at the time specified and all bidders and other persons shall be invited to be present.

The Board reserves the right to reject any or all bids and to accept that bid which appears to be in the best interest of the district. The Board reserves the right to waive any formalities in, or reject, any or all bids or any part of any bid. Businesses located in Randolph County may, at the discretion of the Board of Education, be given preference at the time the Board awards bids.

The bidder to whom an award is made may be required to enter into a written contract with the district. Any agency that participates as a partner with the RCBOE in application for a competitive grant, shall be exempt from the competitive bid process. The school system may enter into a contract(s) with a partner agency for performance of services as specified in the grant application.

#### Conflict of Interest (2CFR 200.318(c)(1))

#### Definition

Conflict of Interest is a conflict between the official responsibilities and the private interests of a person or entity that is in a position of trust. A conflict of interest would arise when an individual or organization has a financial or other interest in or participates in the selection or award or funding for an organization. Financial or other interest can be established either through ownership or employment.

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

- No employee, officer, or agent may participate in the selection, award, or administration of a contract supported by a federal award if he or she has a real or apparent conflict of interest (2 CFR §200.112).
- Such a conflict of interest would arise when the employee, officer, or agent, any member of his
  or her immediate family, his or her partner, or an organization which employs or is about to
  employ any of the parties indicated herein, has a financial or other interest in or a tangible
  personal benefit from a firm considered for a contract.
- Officers, employees, and agents of Randolph County School System may neither solicit nor accept gratuities, favors, or anything of monetary value from contractors or parties to sub-contracts.

An educator shall maintain integrity with students, colleagues, parents, patrons, or businesses when accepting gifts, gratuities, favors, and additional compensation. Unethical conduct includes but is not limited to:

 soliciting students or parents of students, or school and/or LUA/school district personnel, to purchase equipment, supplies, or services from the educator or to participate in activities that financially benefit the educator unless approved by the local board of education/governing board or authorized designee.

- 2. accepting gifts from vendors or potential vendors for personal use or gain where there may be the appearance of a conflict of interest.
- 3. tutoring students assigned to the educator for remuneration (compensation) unless approved by the local board of education/governing board or authorized designee; and
- 4. coaching, instructing, promoting athletic camps, summer leagues, etc. that involves students in an educator's school system and from whom the educator receives remuneration unless approved by the local board of education/governing board or authorized designee. These types of activities must follow all rules and regulations of the Georgia High School Association.

Any employee who has a possible conflict of interest or suspects another employee of having a potential conflict of interest must disclose the situation to the Chief Financial Officer who will determine if a conflict of interest exists. If a conflict of interest exists, the Chief Financial Officer will report this finding to the Superintendent and together will determine if the employee must be removed from the selection, award, or administration of the contract. If the Chief Financial Officer is suspected of having a potential conflict of interest, the report must be given to the Superintendent (Human Resources). The Superintendent will determine if the matter needs to go before the Board of Education or a report to PSC is warranted. Randolph County School System Board of Education thoroughly and expeditiously investigates any reported cases of violations of conflicts of interest to determine if disciplinary, financial recovery and/or criminal action should be taken.

# Personal Compensation (2 CFR Sec. 200.430(a)(1))

#### **Pavroll**

The Federal Program Director works with Payroll office to ensure payroll reports are accurate. In addition, each program coordinator ensures that the number of federally-funded employees is consistent with the approved application. Payroll reports, expenditure summary and detail reports will be used to ensure that each object code is accurate.

#### **Contracted Services**

The Federal Program Director works with the Principal or designated school employee 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. A time sheet must be maintained by any employee who provides supplemental instruction outside of school hours. The Federal Program Director will ensure that an annual periodic certification or personnel activity report will be maintained for all employees paid with federal funds.

#### **Periodic Certification**

Periodic Certification Forms are completed annually by any employee who worked on one federal grant or one cost objective (job). Charges for their salaries and wages will be supported by a periodic certification certifying that the employee worked solely on that program for the period covered by the certification. These certifications will be prepared annually and will be signed by the employee or supervisory official having first-hand knowledge of the work performed by the employee.

Periodic certifications will be completed in accordance with federal guidelines and completed "after-the- fact." The Federal Programs Director will notify the various principals and school administrative assistant of the time to begin preparations for obtaining periodic certifications in June (in order to include any post-planning training or summer training). The form acknowledges source of funding and duties / responsibilities. Forms are then given to the school Principal, when applicable and forwarded to the Federal Programs Director for reviewing and signing. Forms will be kept on file in the Federal Programs Office.

#### **Personnel Activity Report (PAR)**

A PAR will be maintained for any employee who works on more than one federal grant and more than one cost objective (job). Split-funded personnel paid with federal funds are required to maintain monthly time logs that coincide with one or more pay periods that must account for the total activity performed. The logs will be signed by the employee and the employee's immediate supervisor. The appropriate supervisor is responsible for checking monthly to ensure logs are being maintained. Additionally, the director/supervisor will work with the employee to complete reconciliation and appropriate adjustments will be made prior to the end of the school year. A fixed schedule will replace the PAR for a split funded person that does the same job daily.

#### Stipends (GaDOE 160-3-3.04) and Bonuses

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.

All stipends will be written in the form of a contract and must pre-date the activity or service being performed. The contract must be signed by both parties: Program Director/Administrator and the employee seeking the stipend. The employee's name, time/date(s) worked, and the amount due to each employee, must be stated on the contract. The Program Director is responsible for providing the funding codes to be used when making the payment to employee. Payroll will not process without the approval of the Program Director.

After information is received from the Program Director, the contract is given to the Superintendent for

approval. Once signed by both the Program Director and the Superintendent, the Payroll Officer will enter the information into the accounting software to be processed. In most cases, stipends/bonuses will be included in the regular payroll check, but outlined on the pay stub as a separate payment entry.

The principal (or designee) and appropriate program director will maintain the appropriate paperwork to ensure employees are adequately compensated. Documentation will be secured to verify work is allowable, reasonable, and necessary. Professional learning will address SWP/SIP, DIP (Strategic Plan), and must be demonstrated in the work setting. Stipends will not be used for board members nor persons not employed by the board.

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

#### **Hazard Pay**

For ESSER/ARP funds, 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.

#### Travel Expenses (CFR 200.474)

- All travel to be paid for using federal funds must be pre-approved by the Federal Programs Director. A
   Leave of Absence form must be completed by the employee and signed by the building principal (if
   applicable), Federal Programs Director (if applicable) and the Superintendent prior to the
   activity/event.
- All travel reimbursements are made according to state travel regulations.
- All travel must align with the district needs as identified through the comprehensive needs assessments (conducted district-wide).
- All travel must be allowable and in accordance with federal guidelines.
- Within a week of returning from a professional learning activity, information will be redelivered to the staff if appropriate. If the opportunity for redelivery is not an option, a professional learning impact form will be completed.
- Employee must submit a request for reimbursement (expense report) within 60 days of traveling. Documentation such as receipts for lodging and other expenses must be attached. A per diem food allowance will automatically be factored in. Employee does not have to present food receipts.
- All documents from professional learning activities, conferences and/or workshops (agendas, programs, etc.) must be submitted along with expense report.
- Unless stated otherwise in a binding contract, employees and consultants acting on behalf of
  the district in an official business capacity will be reimbursed for expenses related to
  transportation, lodging, and subsistence, and related items (within the limits of state travel
  regulations).
- Registration fees for conferences will usually be prepaid by the District; however, there may be

- exceptions to this.
- Requests for reimbursement must be approved first by the Federal Programs Director.

#### Suspension & Debarment (34 CFR 85.110)

Prior to approving any purchase equal to or in excess of \$25,000, each federal program director and/or department head will check for suspension and debarment, using one of three options:

- 1. SAM website: Check Georgia's System for Award Management (SAM) website, https://sam.gov/content/home and include verification for suspension and debarment with a date/time stamped print screen (requires a SAM user account) or a signed and dated copy of the screen, person responsible for checking, and query criteria; or
  - 2. Collecting a certification from the vendor/person to ensure they have not been suspended or debarred; or
  - 3. Adding a clause or condition to the covered transactions with the vendor/person ensuring that they have not been suspended or debarred.

The federal program director will check once and if the vendor becomes suspended or debarred during the year, The Randolph County School System may choose to continue to use the vendor if the district was using the vendor before the vendor was excluded (2 CFR 180.315).

#### **Transferability Procedures-ESEA Sec. 5102**

Under the ESEA, SEAs and LEAs may transfer funds they receive by formula under certain programs to other programs to better address State and local needs. The ESSA amended the transferability authority by changing the programs from and to which an SEA or LEA may transfer funds and removing limits on the amount of funds that may be transferred. This guidance addresses those changes.

What is transferability? Transferability is a flexibility authority that permits State educational agencies (SEAs) and local educational agencies (LEAs) to transfer a portion of the funding they receive by formula under certain Federal programs to their allocations under other programs so they can address more effectively their unique needs.

#### **Programs from Which an LEA May Transfer Funds**

Title II, Part A—Supporting effective instruction

Title IV, Part A—Student Support and Academic Enrichment grant (ESEA section 5103(b)(2). An LEA may not transfer funds it receives under any other ESEA program.

#### **Programs to Which an LEA May Transfer Funds**

Title I, Part A—Improving basic programs operated by LEAs

Title I, Part C—Education of migratory children

Title I, Part D—Prevention and intervention programs for children and youth who are neglected, delinquent, or at-risk

Title II, Part A—Supporting effective instruction

Title III, Part A—State grants for English language acquisition and language enhancement

Title IV, Part A—Student Support and Academic Enrichment grant

Title V, Part B--Rural education (ESEA section 513(b))

#### **Guidelines on Transferability**

An LEA does not have to apply for transferability authority; it already has that authority (ESSA Sec. 5103(b)).

The funds transferred into other eligible ESSA programs are subject to all rules and regulations of the other eligible ESSA programs.

Equitable services requirements are not waived, and timely and meaningful consultation must occur prior to transferring funds from one program into another program.

LEAs should think about how the transfer of funds will impact any of their required set-asides.

#### **Transferability Process**

The Randolph County School System transfers Title II and Title IV funds into Title I-A funds. The Federal Programs Director indicates the funds will be transferred during the completion of the CLIP. The sending program budget is completed, indicating the funds will be transferred and approved. The Federal Programs Director collaborates with the Finance Department to review expenditures to determine which ones would be coded for Title I-A or the sending programs. Drawdowns for the sending program are performed for the transferred grants prior to the receiving grant. Drawdown for the sending program is completed in the DE0147 for that program. Drawdowns for the receiving grant are completed in the DE0147 for that program. The actual expenditures for both the receiving grant and the sending grants (the transferred-in amount) will be reported on the receiving grant completion report by function and object. Since the transfer-in amount was combined with the Title I-A itemized budget, the expenditures for both programs will be reported on Title I-A.

### **Inventory**

#### **Procedures for Managing Equipment 200.313(d)**

Federal programs equipment inventory is maintained on a spreadsheet by location and identifies the item description, vendor, date of purchase, purchased price, Serial Number and barcode, Funding source, FAIN identification, specific location, use, condition, and disposition. Equipment purchased with Federal funds, including ESSER funds are fixed with a barcode that can be scanned for identification purposes. The District Technology Director, building principals, building media specialists, and the Federal Programs Director maintain copies of current inventories in their offices.

#### **Acquisition of equipment**

All equipment purchased with Federal funds must be in accordance with the Federal Guidelines/regulations of the funding source. Items purchased with federal funds must be identified through an appropriate needs assessment process that assures the items to be paid for with federal funds are necessary, reasonable, allocable, and allowable. The Federal Programs Director meets with the Technology Specialist, who works with the Media Specialist at each school, to review the process for inventory of equipment. Purchase orders are completed and submitted to the Federal Programs Director for approval. Approval is dependent upon identified area of need; request meets requirements of the Federal Program and/or ESSER and the Schoolwide/School Improvement Plans. After approval is granted by the Federal Programs Director, a PO is completed. Goods are received by the Federal

Programs office. The Federal Programs office compares the items received to the packing slip. The packing slip or invoice is initialed to indicate proper receipt of the items listed. Items are disbursed to the appropriate person/school requesting the purchase.

#### **Entry of information into Inventory**

All information will be entered into an inventory spreadsheet by the Technology Director prior to merchandise leaving the Federal Programs Office. Equipment must be entered within 30 days of equipment being received. All Federal Programs I equipment will be delivered to school media centers who will in turn tag and label items with a barcode for inventory tracking. The inventory spreadsheet is a document shared between the Federal Programs I Director, Media Specialists and the Technology Director. The Technology team will enter the specific location (room number) and barcode information into the spreadsheet. The Technology Director will use the information in the spreadsheet to add items in the Frontline Asset Management System. All equipment purchased is monitored by the appropriate system-level federal program coordinator and school-level administration or their designee(s). Physical inventories are conducted bi-annually by each facility and are subsequently reviewed by the Federal Programs Director.

The schools should retain equipment in a program as long as there is a need for such property to accomplish the purpose of the program for which it was purchased, and items will stay on the inventory if they are still being used.

#### Required Inventory Components (200.13(d)

- Description of Property
- Cost
- Funding Source & Percentage of Source
- Vendor
- Acquisition Date
- Location of Property
- Use
- Condition of Property
- Disposition of the equipment including the date of disposal
- Federal Award Identification Number (FAIN)

#### Off-site use of Equipment

Equipment may be used off-site when checked out through the media center. When using equipment offsite, staff and parents accept full responsibility for the safe and secure handling of the equipment. If the equipment is a laptop, staff members will complete a check-out form. Media Specialists will maintain a record of items checked out for off-site use.

#### **Physical inventory**

A physical inventory of equipment purchased with federal funds shall be taken and the results reconciled with the equipment records at least once every two years in accordance with 2 C.F.R. Part 200.313 (d)(2). Physical inventories are conducted every two years or if a situation calls for additional inventories. During the fall of the year, the Title I Director will meet with all principals to review procedures and pertinent

information and all principals are given a copy of the inventory for their building. A physical on-site inventory is conducted every two years:

- At the direction of the principal, the media specialist and the technology director will perform the inventory.
- The person conducting the inventory will sign and date the inventory to provide verification that the inventory was conducted.
- A copy of the verification must be maintained in the Federal Programs office.

Random site visits may occur throughout the school year. The Federal Programs Director will work with schools to correct any findings and discrepancies. Any discrepancies will be investigated to determine the causes of the discrepancy.

#### **Equipment Disposition**

In the event the equipment is no longer usable, materials and equipment will be disposed of following the Randolph County School System's disposal procedures. When computer equipment is no longer operational, it will be recycled or disposed of. Schools are given the opportunity each summer to dispose of technology that is out of date or no longer operational. The appropriate Technology Disposal Form should be completed, and a copy sent to the Title I Director. Inventory records will need to be corrected, printed, and maintained by schools and Title I Director. At the designated time, the outdated technology is brought to the Central Office to be recycled or stored under the direction of the Technology Director. The Technology Department will dispose of and recycle all equipment. Currently, the school system does not receive any money for the recycle or disposal of equipment.

#### Loss, damage or theft of Equipment

Equipment that is damaged, lost, or stolen will be reported to the Title I Director. A police report will be required for stolen property. Lost equipment will be verified by the principal and noted in the inventory. Safeguards have been put in place to protect against loss, damage, or theft of equipment. All equipment must be checked out of the library using the Destiny System. Teachers or designee should count items when checking materials out and returning to the media center. Equipment, such as laptops, tablets, calculators, and Chromebooks are stored and locked in the media centers.

Chromebook/Tablet carts with a locking device are also used when items are checked out. A camera system is in place to monitor all entrance and exit doors to the media centers. To protect tablets against damage, protective covers are purchased.

#### **Equipment use for Title I, Part A targeted assistance programs**

All Randolph County Schools have Title I, Part A Schoolwide Programs.

#### **Equipment use for Private Schools**

Federal funds can only be used to purchase materials and equipment to meet the needs of participating private school students. For items purchased with Title I funds, non-Title I private school students may not use materials and equipment purchased with Title I funds. Items purchased with ESSER funds will be used for the purpose of the grant. It is important to remember that although the equipment may be used by the private school, the public school retains the ownership of the equipment and must continue to account for the equipment in its inventory management system.

#### **Maintenance Procedures**

Title I technology equipment and ESSER equipment is maintained by the Technology Department. All new equipment is purchased with a 3-5 year warranty and includes virus and malware programs that are set to update automatically. Yearly all technology equipment is checked (cleaned, performance updates, deletion of unnecessary programs, etc.) We have regularly scheduled backups for all servers and administrative computers.

Each staff member has an email address to send technology requests directly to the technology department when issues occur. The technology department responds to the requests in the order in which they are received. If technology is removed from a classroom, the technology specialist should notify the media specialist and the Title I Director so that the inventory can be updated. This can be done via email.

#### Cash Management (2 CFR 200.313(b)(6)) and Drawdown of Funds (2 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 CFO to work cooperatively to review all expenditures periodically after budget approval before funds are drawn down from GAORS. Moreover, the following practices are observed:

- The CFO will perform periodic reviews of the federal funds.
- The federal program directors perform periodic evaluations of the management of federal funds by monitoring drawdown activities and expenditures to budgeted amounts.
- Funds are drawn down based on actual expenditures and on a reimbursement basis only.
- The CFO runs the budget Summary of Activity Report and Detail of Activity Report and sends to Program Directors for review.
- If a discrepancy is found by the Program Director, the Program Director prints the detail page
  from the detail report and writes the needed adjustment and initials the needed correction and
  submits it to the Financial Accounting Officer. A journal entry is prepared and posted by the
  Financial Accounting Officer and documentation is attached to the journal entry and maintained
  in the finance office.
- The Superintendent signs off on all journal entries.
- Once discrepancies are resolved or if there are no discrepancies, the CFO prepares a DE0147 Request for Reimbursement form which is signed by the CFO and the program Director.
- The CFO submits the DE0147 on GAORS, prints request and attaches supporting documentation. The completed packet is submitted to the Superintendent for approval.
- The CFO sets up an accounts receivable for reimbursement in the accounting system.
- When the drawdown is received into the district's bank account, the CFO posts the receipt
  against the accounts receivable. Superintendent reviews and approves the bankaccount
  reconciliation monthly.
- There is no cash involved as all drawdowns are directly deposited into the system's bank account.
- Federal program Director 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 Finance Department and can be reviewed upon request.
- At year end reconciliation for GAORS grants, a report is printed from the accounting software (PCGenesis) along with the consolidated application and the Federal Program Director reviews and grants permission to the CFO to submit the Completion Report. The CFO will then submit to GaDOE. Once submitted, the Completion Report is signed by the Program Director to verify that it has been completed. The original is kept on file in the Finance Office and a copy is made for the Federal Program Directors file for monitoring.

#### Contracted Services (Consultants and Purchased Services) (CFR 200.323)

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

- Contracts are generated by appropriate federal program coordinator.
- Specific duties are specifically spelled out for each contract.
- The contract includes the number of hours to work and the rate of pay.
- A copy of a W-9 and identification must be submitted with the contract.

Each contract is signed by the following: contractor, principal (if school-based), and the appropriate Federal Program Director. The Federal Program Director provides oversight in ensuring that all contractors' work is complete before funds are released for reimbursement. Artifacts, daily sign in sheets to indicate completion of all workshops are kept on file by the appropriate federal program coordinator.

The federal program coordinator signs off on all invoices/contracts prior to the issuance of payment for services. These contracts must be maintained and kept by the Federal Program Director. Randolph County School System does not use sub recipients.

#### **Grant Development and Budget Process**

The Federal Program Director prepares a yearly budget showing the distributions for district, per school and/or per program/function/object code. Federal program coordinators ensure that all funds budgeted are allowable per funding source. Once the budget is approved, the CFO enters the budget into the system financial software using the Consolidated Application Budget as the source.

#### 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 Office. Accounting records to support the results of outlays (expenditures indicated in the completion report will be kept on file in the Finance Office). Copies of expenditure (cumulative through) report for the respective quarter for total expenditures reported to GaDOE will be kept on file in the Finance Office. Federal program coordinator will examine budget summary and detailed expenditure reports for his/her 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 summary and detail reports for each grant will be reviewed to ensure that all expenditure postings are correctly recorded. The summary report will include all related expenses for the grant, based on ending grant date and/or districts' decision for funding time.

#### **Monitoring and Reporting Program Performance (CFR.328)**

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

Steps to Audit/Monitoring Resolutions:

- Once the audit/Cross-Functional Monitoring report is received, the appropriate federal program coordinator will review all items. The Cross-Functional Monitoring report will be retrieved from the GaDOE website under the Consolidated Application.
- Each item will be examined carefully, and a team of system-level staff will determine the best means of corrective action.
- Items are gathered, and a corrective action is completed by the appropriate federal program coordinator.
- The Corrective Action is submitted to the Superintendent.
- The Corrective Action is then sent to the GaDOE Auditor/Cross Functional Monitoring team 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 compliance with applicable laws and regulations.

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

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

#### Capital Expense Funds (CFR 200.439)

All equipment with a per-unit cost of \$5000 or more must have prior written approval from the assigned

GaDOE Program Specialist containing the detailed expenditure, cost and purpose/use of the expense. All approvals must be within the period of performance. All documentation will be sent to the Program Specialist by the appropriate director for approval prior to being budgeted. This process will cover all federal programs for the district. ESSER/ARP will follow the same process with the Title I/Federal Programs Director securing approval and keeping documentation for monitoring.

#### Fraud, Waste, Abuse and Corruption

The Federal Programs Coordinators review 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), and ESSER/ARP with all administrators during fall meeting. An agenda and sign-in sheet will be kept to document this has been completed. Principals will discuss the same information with their personnel.

Each employee in Randolph County receives a copy of the policy and procedures once a year. Each employee signs indicating that he/she received the Fraud Policy and procedures for reporting fraud, waste, abuse, and corruption. Documentation is maintained in the Title I Director's office.

## RCBOE Board Policy (DIE): FRAUD and WASTE, ABUSE and CORRUPTION PURPOSE:

In compliance with White House Executive Order 12731, the Randolph County School System provides employees, clients, vendors, and individuals with confidential channels to report suspicious activities. The Randolph County School System shall not tolerate fraud, waste, abuse, or corruption of any kind and has an established system for the reporting of suspicious activities.

#### **DEFINITIONS:**

**Fraud:** 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.

**Waste:** The thoughtless or careless expenditure, consumption, mismanagement, use, or squandering of local, state, or federal resources to the detriment or potential detriment of the District. Waste also includes incurring unnecessary costs as a result of inefficient or ineffective practices, systems, or controls.

**Abuse:** Excessive or improper use of resources, or employing resources in a manner contrary to the natural or legal rules for their use. Abuse also includes intentional destruction, diversion, manipulation, misapplication, maltreatment, or misuse of resources; extravagant or excessive use as to abuse one's position or authority.

Corruption: A form of dishonest or unethical conduct by a person entrusted with a position of

authority, often to acquire personal benefit. Corruption may include many activities, including bribery and embezzlement.

#### **CONFIDENTIALITY:**

All reports of suspected fraud, waste, abuse or corruption must be handled under the strictest confidentiality. Only those directly involved in the investigation should be given information. Informants may remain anonymous but should be encouraged to cooperate with the investigators and should provide as much detail and evidence of alleged fraudulent act as possible.

#### **RESPONSIBILITIES:**

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

All reports of suspected fraud, waste, abuse, or corruption 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 as possible of an alleged violation of this policy.

Any and all reports of suspicious activity and/or suspected fraud, waste, abuse, or corruption 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.

#### **PROCEDURES:**

1. Anyone suspecting fraud, waste, abuse, or corruption whether it pertains to local, state, or federal programs, shall report his or her concerns to the Superintendent or the Superintendent's designee at the following address:

Randolph County Board of Education Attn: Superintendent 98 School Dr. Cuthbert, GA 39840 229-732-3601 () 229-732-3840 (f)

- 2. Any employee with the Randolph County Board of Education (temporary staff, full-time staff, and contractors) who receives a report of suspected fraudulent activity MUST report this information within the next business day. The employee should contact the Superintendent or Superintendent's designee at (229)-732-3601. Employees have the responsibility to report suspected fraud, waste, abuse, or corruption. All reports can be in confidence.
- 3. The Randolph County Board of Education of its designees shall conduct investigations of employees, providers, contractors, or vendors against which reports of suspicious activity are made. All investigations shall be thorough and complete in nature and shall occur in a prompt

- manner after the report is received.
- 4. If necessary, the person reporting the fraudulent activity will be contacted for additional information.
- 5. Periodic communication through meeting should emphasize the responsibilities and channels for reporting suspected fraud, waste, abuse, or corruption.
- A hard copy of these Fraud, Waste, Abuse, and Corruption Administrative Regulations shall be posted in a visible location at all schools and facilities and on the Randolph County School website (www.sowegak12.org)
- 7. A report shall be made to the Chairman of the Randolph County Board of Education if fraud, waste, abuse, or corruption is suspected of or by the Superintendent.

Each employee shall receive a copy of this document and will sign attesting that he or she has indeed received this information and understand its contents.

#### **E thics**

The Randolph County School System provides Ethics training for all staff during Pre-planning. An agenda and sign-in sheet will be kept to document this has been completed.

Each employee in Randolph County receives a copy of the Code of Ethics once a year. Each employee signs that he/she received the Code of Ethics and documentation is maintained in the Human Resource Director's office.

#### **Complaint Procedures**

The complaints process may be initiated by students, parents, staff (certified and non-certified), private schools and the general public. Parents/school communication is described in student handbooks and on the website. Parents are expected to address complaints or grievances beginning at the school level with the teacher first and then the administration. Central office personnel should be contacted next should parents feel the issues have not been resolved. Conferences forms/notes/minutes are kept on file as documentation of the issues.

Complaint procedures under the Every Student Succeeds Act (ESSA) are available from the Federal Programs Director. The complaint procedures describe grounds for complaints, federal programs for which complaints can be filed, filing and investigation of a complaint, as well as rights to appeal. The address to which complaints should be filed is included in the procedure.

Complaint Procedures Under Every Student Succeeds Act (ESSA)

#### A. Grounds for a Complaint

Any individual, organization or agency (complainant) may file a complaint with the Randolph County Board of Education if that individual, organization or agency believes and alleges that a violation of Federal statute or regulation that applies to a program under ESSA has occurred. The complaint must allege a violation that occurred not more than one (1) year prior to the date that the complaint is received unless a longer period is reasonable because the violation is considered systemic or ongoing.

- B. Federal Programs for Which Complaints Can Be Filed
  - a. Title I, Part A: Improving the Academic Achievement of the Disadvantaged

- b. Title I, Part A: Academic Achievement Awards
- c. Title I, Part A: Foster Care Program
- d. Title I, Part A: Family-School Partnership Program
- e. Title I, Part C: Education of Migratory Children
- f. Title I, Part D: Programs for Neglected or Delinquent Children
- g. Title II, Part A: Supporting Effective Instruction
- h. Title III, Part A: Language Instruction for English Learners and Immigrant Students
- i. Title IV, Part A: Student Support and Academic Enrichment
- j. Title V, Part B: Rural Education Initiative
- k. Title IX, Part A: McKinney-Vento Homeless Assistance Act
- I. Individuals with Disabilities Education Act (IDEA)
- m. Elementary and Secondary School Emergency Relief (ESSER) Act, the American Rescue Plan (ARP) Act.

#### C. Complaints Originating at the Local Level

As part of its Assurances within ESSA program grant applications and pursuant to Section 9306 of 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 Randolph County Schools to no avail, the complainant must provide the Georgia Department of Education written proof of their attempt to resolve the issue with Randolph County Schools.

D. Filing a Complaint

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

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

### The complaint must be addressed to:

Donna Drakeford, Federal Programs Director Randolph County Schools 98 School Dr. Cuthbert, GA 39840

#### E. Investigation of Complaint

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

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

If additional information or an investigation is necessary, the school system will have sixty (60) days from receipt of the information or completion of the investigation to issue a Letter of Findings. If the Letter of Findings indicates that a violation has been found, corrective action will be required and timelines for completion will be included. The 60-day timelines may be extended, if exceptional circumstances exist. The Letter of Findings will be sent directly to the complainant.

#### F. Right to Appeal

If the complaint cannot be resolved at the local level, the complainant has the right to request review of the decision by the Georgia Department of Education. 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 school system's decision and include a complete statement of the reasons supporting the appeal.

#### **Dissemination of Complaint Process**

Each employee receives a copy of this document and will sign attesting that he or she has indeed received this information and understands its contents.

## **Section 6: Individual Federal Programs**

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

#### **Title I, Part A-Within District Allocation Procedures**

#### Allocating Funds to Attendance Areas (34 CFR 200.70 and 200.71)

Randolph County School System has three schools, K-5—Randolph County Elementary School, 6-8—Randolph County Middle School, and 9-12—Randolph-Clay High School. Randolph County also has one HeadStart Program with two PreK classes.

#### **Procedures for Determining Rank Order When Using the CEP Option**

All schools in the Randolph County School System are eligible for CEP. The School Nutrition Department uses direct certification data, such as data from the Supplemental Nutrition Assistance Program (SNAP) or Temporary Assistance for Needy Families (TANF) program to determine the federal cash reimbursement provided by USDA. School Nutrition no longer relies on annual free and reduced meal (FRM) applications to determine eligibility, which was previously used for Title I, Part A allocations. To account for low-income families not reflected in the direct certification data, USDA sets meal reimbursement levels for CEP schools by multiplying the percentage of students identified through the direct certification data by a multiplier established by the Act. Under the CEP, schools must conduct direct certification once every four years.

The SNP department provides the Title I Director with the direct certified student count per school using the Title I Data for CEP Schools form for the current school year. Randolph County School System multiplies the number of students identified by the direct certification data by the statutory multiplier specified in the Healthy, Hunger-free Kids Act of 2010 and divides the number by the enrollment in each school (Oct. FTE count) less Pre-K to establish the percentage of economically disadvantaged students for Title I Allocation. Based on this percentage, the schools are ranked in order from highest percentage of poverty to lowest percentage of poverty. Randolph County School System allocates Title funds based on rank order.

All three schools of Randolph County School System: Randolph County Elementary School, Randolph County Middle School, and Randolph County High School are Title I schools; and all students are eligible for Title I services.

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

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

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

Required 1% Set Aside for Parental Engagement: Principals have the option of expanding their 95% of the required 1% set aside in Parent Engagement funds or submitting them back to the system level Principals typically decide to direct those funds to a system level parent involvement activity/project by signing a District-wide Parent Activity Assurance form. The funds are used at the system level to fund a Family and Community Engagement Specialist who serves all schools. Title I parents are informed about the 1% set aside during the Annual Title I Meeting and participate in the discussion regarding this requirement each spring during Title I planning meetings held at each school. If the total 1% is not expended, the difference must be carried over to the following fiscal year.

#### **Homeless Children and Youth Set-Aside**

Homeless students are automatically eligible for Title I support, regardless of their school of

attendance. Homeless students must be served by Title I through their school's Title I program and/or through the mandatory reservation of funds set-aside. Schools with school-wide Title I programs must provide similar services to homeless students as are provided to other students being served by the school's Title I program. Title X, Part C – Sec. 722(g)(4)(B) Title I mandates that school districts set aside a portion of their Title I dollars to serve homeless students attending non-participating schools. This is known as the mandatory reservation of funds set-aside. Title I, Part A - Sec 1113(c)(3)(A) This includes providing educational support services to children in shelters and other locations where homeless children may live. A district has the discretion to use reserved funds to provide services that are not ordinarily provided to other Title I students and that are not available from other sources Federal law does not mandate a specific set-aside calculation method or amount. The amount reserved is to be determined by the district, as appropriate. Each district must have a Homeless Set-Aside using one of four possible calculation methods.

Four possible methods to calculate homeless set-aside:

- Method 1: Identify homeless student needs and fund accordingly
- Method 2: Obtain a count of homeless students and multiply by the district's Title I, Part Aper- 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
   I, Part A allocation

To best meet the needs of the homeless population in Randolph County, the district utilizes Method 1 to calculate the district's homeless set aside.

#### **Neglected and Delinquent**

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

**Private School Proportionate Share:** If a district has participating private school schools, the district will use the Title I Private School Proportionate Share Calculation Spreadsheet provided by GaDOE to set aside funds for participating private schools. The set aside description will include the name of each participating private school along with the private school's proportionate share with a breakdown for the amounts allocated for Parent and Family Engagement, any Administrative Cost and Professional Learning.

Currently, Randolph County does not have any private school participation. Should a private school choose to participate, the Randolph County School System will consult with the private school to

develop a service plan and provide appropriate services. The district will set aside funds as indicated by Title I Private School Proportionate Share Calculation Spreadsheet provided by GaDOE.

#### **Procedures for Determining Allocations and Budgets**

After receiving notification of the Title I, Part A grant amounts from GADOE, reservations that will not be included in the school budgets entered on the set aside page of the consolidated application. Required and optional set asides are included. Components such as Family-School Partnership, professional learning, neglected and delinquent, private school per pupil and equitable services, and homeless students are included on the set aside page and always budgeted in the LEA budget as 8010. Administrative costs are also part of the reservations, which are not part of the schools' per pupil amounts.

Per pupil amounts are allocated to schools in rank order of poverty based on the number of children from low-income families who reside in eligible attendance areas. Low-income is determined by the number of free or reduced lunches or the direct certified children at a school as a percent of the previous year's October FTE count. Higher ranking schools receive the same per pupil amount or more than the school ranked below those schools. The per pupil allocation is always large enough to provide a reasonable assurance that each school can operate a Title I program of sufficient scope and quality. Typically, carryover funds are allocated in one of two ways: (1) to schools by increasing the per pupil amount maintaining rank order, basing that amount on the total number of children from low-income families in each area or (2) the funds are allocated back to all the schools on an equal basis and give each school an opportunity to spend the funds.

Whether from the original allocation or carryover funds, schools must only request activities/equipment/materials that are justified by the district/school CNA and are included in the school's improvement plan. If the district serves private school(s) the amount to be set aside and budgeted for the private school(s) for academic services, professional learning, and parental involvement is provided to the district by the GaDOE. There is no carryover for private school funds.

#### **Calculating Parent and Family Engagement Carryover**

The Federal Programs Director will meet with the CFO to calculate the required carryover amount for the 1% required set-aside for Parent and Family Engagement. Using the Completion Report, the Federal Programs Director will complete a worksheet that shows the amount allocated and the amount expended for the grant period. The completion support is supported by the budget master summary of activities. The Federal Programs Director will upload this worksheet to the Consolidated Application Attachments tab. Randolph County expends the required 1% for Parent and Family Engagement.

#### **Targeted Assistance Program**

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

#### **Professional Qualifications**

#### **Professional Qualifications of Teachers and Paraprofessionals**

The Randolph County School System seeks to hire qualified teachers, paraprofessionals and administrators. Vacancies are posted on the www.teachgeorgia.org website. Job requirements are included in the application process to ensure that the applicants have met the minimum qualifications to meet the required professional qualifications.

#### **Parent Right to Know**

In accordance with ESSA, all schools are required to notify parents at the beginning of each school year of their "Right to Know" the professional qualifications of their student's classroom teachers and paraprofessionals. In the spring of each year, the Federal Programs Director or designee sends to the principal of every school/program a list of Required Notifications for Student Handbooks/Agendas. 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 digital handbook containing the Parent's Right to Know to the Federal Programs Director as evidence of parental notification of their Right to Know. The Right to Know letter is also part of the registration packet. Parents sign a form stating that they have received the Right to Know letter as part of the registration packet. 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 Notifications**

If a student has been assigned to or has been taught for four or more consecutive weeks by a teacher who does not meet the LEAs professional qualifications, parents will be sent a 20-day notification letter. This letter will be provided by the building Principal, within 10 days following the four consecutive weeks. The letter will be given to all of the students listed on the roster of the teacher of concern for them to deliver to their parents. The letter will include the following:

- Day/month/year of notification
- Name of the teacher who does not meet the LEA's professional qualification requirements
- Name of the school and the point of contact, by position (principal)
- Statement that the teacher has not met state certification or Randolph County's professional
  qualification requirements for the grade level(s) and/or subject are(s) in which the teacher is
  assigned

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

## Section 7: Title I, Part A—Notice to Parents

#### **Notice to Parents of participating English Learners**

A notification letter is sent to the parents of every student who initially qualifies or continues to qualify for basic ESOL services. No later than 30 calendar days after the beginning of the school year (or within the first two weeks of an EL being placed in a program), the Title I Department will notify parents of English Learners if their child is participating in a supplementary language program. The notification will be provided in a language parents can understand. Initial letters will be mailed home to the parents of students receiving supplemental services. Subsequent letters will be generated by the student's ESOL teacher and sent home with the student. As letters are sent to parents, notification will be notated in the ESOL notebook in the Title I Office. Because this letter is an Office for Civil Rights requirement, any expenses associated with the translation or dissemination of the letter must be drawn from state or local fund sources.

## Section 8: Title I, Part A—Parent and Family Engagement

#### **Parent Involvement Policy Overview**

Schools empower parents by providing them ways to actively participate, promoting them as important voices in the school, and removing barriers to engagement. The Randolph County School District affirms and assures the rights of parents to participate in the development of schools' goals and objectives and encourage involvement in all areas of their children's educational experiences.

Parental involvement is defined as the participation of parents in regular, two-way and meaningful communication involving student academic learning and other school activities. 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.

#### **Technical Assistance to Schools**

LEA Technical Assistance to schools on Parent Engagement Requirements and Best Practices. The LEA provides technical assistance to schools in the following ways:

- Professional learning sessions during administrative and Curriculum meetings
- One-on-one meetings held at each school site between the Federal Programs Director and/or Family & Community Engagement Specialists and school leaders
- Monthly Parent & Family Engagement events/activities
- The creation and sharing of a Federal Programs Handbook.
- The creating and sharing of a Parent & Family Engagement Resource Guidebook
- Technical assistance with planning, organizing, and conducting parent meetings
- Ongoing emails, phone calls, and school visits

#### **Parent Notifications:**

#### **Communication in an Understandable Format**

Upon enrolling their child(ren) in the Randolph County School System, every parent indicates their

household's preferred communication language as a standard part of the registration process. To the extent practical, efforts are made to provide either written support or support through an interpreter when a parent indicates a language other than English. Furthermore, all parent communication is written in a format so that the content is easily understandable.

#### **School Designation Status**

A school identified as needing Comprehensive or Targeted Support Interventions will receive the support of the LEA and/or School Improvement Division of the GaDOE as appropriate. Parents will be notified of each school's designation status using multiple means of communication. Randolph County currently has no schools identified as in need of Comprehensive or Targeted Support.

#### Parental 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 engagement policy.

Randolph County School System is committed to cultivating and sustaining partnerships with parents and community stakeholders, and encourages their participation in the development, implementation, review and evaluation of its parental involvement policy/plan. This written policy/plan focuses on improving academic achievement and school performance and outlines how the LEA will coordinate, provide technical assistance and other support to schools in planning and implementing effective parental involvement activities, trainings, and workshops. The LEA, school, parents, and community stakeholders will jointly develop and agree on the Parental Engagement Policy/Plan which will describe the means for carrying out Title I, Part A requirements. The policy/plan will be made available to the local community and parents of students enrolled in the Randolph County School System using multiple means. The policy/plan will be available on the Title I page of the district's website (www.sowegak12.org), in the parent/student handbook, on individual schools' websites, and in hard copy format in the main office of each school.

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

Each school in the Randolph County School System holds an annual open house or parent orientation. These meetings give parents the opportunity to review and provide feedback on system-wide and school student data, parent activities, district and school Parent Involvement Plans, Schoolwide Title I Plans, School Improvement Plans. Parents are notified about this opportunity through advertisements in local media, school-level flyers, social media websites and by using the ClassTag app, and the system web site. The school district uses the comments provided by parents during the annual review/revision of documents at parent workshops and other advisory meetings. After the school system review/revision process, district and school Parent 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.sowegak12.org. Plans include district and school improvement/schoolwide plans, parent involvement policies, school compacts, comprehensive LEA improvement plan, parents' right to know, complaint procedures, and policy on ethics and fraud, waste and abuse. Many of these plans are included in students' first day packets, school-level flyers, social media websites, and the system web site to inform parents about the availability of these plans.

#### **School/Parent Compacts**

The Randolph County School System will share responsibilities for high student academic achievement with all parents and students enrolled in the school system and will develop, incollaboration with parents and students, a school-parent compact that outlines how parents, school staff, and students will share the responsibility for improved student academic achievement. The school-parent-student compact will also describe the means by which the school, parents, and students will build and develop a partnership to ensure student mastery of the GaDOE's high academic content standards. All Title I schools are required to have school-parent compacts. It is the responsibility of the Principal and/or School Administration Team, in coordination with the school Parent Liaison and/or School Parent Contact, the school system Family & Community 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 the Title I Parent Input Meetings, school governance meetings, and parent workshops. Revision dates will be clearly marked on each compact. An invitation will be sent home to all parents and meeting dates will be publicized on each school's web site. The Family & Community Engagement Specialist will be responsible for coordinating with schools to schedule meetings and collect required information (agenda, meeting notes, and sign in sheets). Parent compacts will include responsibilities for the teachers, parents, and students. Compacts will be distributed to all parties involved for signatures each fall. Copies of the signed parent compacts are kept on at the school level.

#### **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 and/or school administration team in coordination with the school Parent

Liaison and/or School Parent Contacts, 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, social media, or local businesses.

#### **Annual Evaluation of Parental Engagement**

*Process to Collect*: An annual survey is conducted each spring. The survey is sent home with each individual student and returned to school. Advertisement of the survey and requests for completion occur through flyers, district and school websites, and ClassTag. The survey is collected and compiled, and the following year's parent 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, community members, School Governance Teams and those attending Annual Title I Meetings. The results of the survey are used to review and revise schoolwide and parent engagement plans and components.

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

Parent 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 engagement and to support a partnership among schools, parents, and the community to improve student academic achievement, through the following activities: annual meetings; conferences; phone calls; parent workshops and activities; family nights; volunteering; open houses; annual notification of school designation; flyers/brochures; website information; school governance team meetings; and Board of Education meetings.

#### **Building Capacity for 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 Family-School Partnership Program, and through student handbooks, newsletters, and flyers. The Family & Community Engagement Specialist considers and plans based on the "six shalls" (Section 1116(e) as well as Section 1112(e)(3)(C) of the ESSA) for building capacity.

#### **Parent Resource Centers**

All schools have parent resource centers. RCMS and RCHS share a parent resource room. A variety of materials and resources are available to parents for use at the school for checkout, or as handouts.

Books, videos, and a variety of other materials have been purchased as sources of information for parents. Desktop computers and printers are also available in the resource centers for parent use. Both parent resource centers are open all day during normal school hours.

## Section 9: School Improvement 1003 (a)

#### School Improvement 1003(a) (84.010)

The purpose of School Improvement 1003(a) is to provide financial resources to LEAs on behalf of Title I schools implementing Comprehensive Support and Improvement (CSI) activities, Targeted Support and Improvement (TSI) activities, and Promise Schools through an application process. Schools within the state w which have been most recently identified as Comprehensive Support and Improvement and Targeted School and Improvement are considered most at risk. However, schools may be deemed "high-risk" for several additional reasons to include:

- Assignment of New Administrators (with 3 years or less of experience);
- Large teacher turnovers;
- Large populations of inexperienced teachers; and
- · Recognized gaps in student achievement performance; and

If identified as a "high-risk" school, additional instructional support will be provided through: additional professional learning support from both district and RESA personnel, concentration of additional instructional support personnel, more frequent technical assistance, and other support services, as deemed necessary and appropriate to carry out quality instructional programs for all students within the LEA. Currently, Randolph County School System does not have any schools identified as CSI, TSI, or Promise. If a school falls within one of these requirements, the procedures outlined by the GaDOE will be followed.

#### Section 10: Services for Homeless Children and Youth

#### <u>Introduction</u>

The Randolph County School System will follow the requirements of the McKinney-Vento Homeless Education Assistance Improvements Act of 2001 to ensure that all children and youth receive a free appropriate public education and are given meaningful opportunities to succeed in our schools. Randolph County Schools' homeless liaison works closely with the school counselors to assure students receive needed services. The Randolph County School System's procedures for Services for Homeless Children and Youth are reviewed and revised, if necessary.

#### **Definitions**

- Children and youth experiencing homelessness means children and youth who are otherwise legally entitled to or eligible for a free public education, including preschool, and lack a fixed, regular, and adequate nighttime residence, including children and youth who:
  - are sharing the housing of other persons due to loss of housing, economic hardship, or a similar reason;

- are living in motels, hotels, camping grounds or trailer parks due to lack of alternative adequate accommodations;
- o are living in emergency or transitional shelters;
- are abandoned in hospitals;
- 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;
- o 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

The Randolph County School System Homeless Liaison works with school counselors in the registration and counseling processes to identify homeless children. The LEA also coordinates with social workers, DFACS, and other agencies to identify homeless children. The Title I director and Homeless Liaison assesses related needs of the homeless children and youths and plans strategies to meet those needs. Case study information is used to identify related needs such as a need for personal school supplies or tutoring. To identify the educational needs of the homeless children, Randolph County uses attendance and discipline data, as well as grades and achievement test results. Available data and information is used to produce a summary of needs. The LEA provides training to all teachers and administrators on educational needs of homeless youth. Homeless children that are identified as students in need of special services follow the procedures as indicated by the Special Education department for identification and services.

#### **Program Procedures**

The district is responsible for identifying a homeless liaison.

- Homeless students will be identified based on the definition prescribed by McKinney-Vento
  Homeless Assistance Act and via a numeric code in Infinite Campus, the district's student
  information system. All teachers and administrative staff in the district will be trained in the
  identification and recruitment of homeless students.
- The homeless liaison will provide annual training for all district level and school staff having contact with homeless students.
- All schools will display flyers, brochures, and posters that identify the Homeless Liaison contact information.

- Services for homeless students (tutoring, etc.) will be evaluated based on student academic achievement.
- Follow BOE policy.

#### **School Selection**

The Randolph County School System only has one school per grade span: Pre-K-5, 6-8, and 9-12. Therefore, school selection is not applicable here.

#### **Enrollment**

Homeless children and youth have the right to enroll in school immediately, even if lacking documentation normally required for enrollment. Enrollment of Homeless students occurs at the appropriate school to which they are assigned based on their grade level. School registrars are trained and attentive to the identification of homeless students during the enrollment process. If a student does not have an immunization, or immunization or medical records, the Homeless Liaison will assist immediately in obtaining them and the student will be enrolled in the interim. A Homeless survey is completed upon enrollment and any homeless survey that indicates a student is homeless should be sent directly to the Homeless Liaison for further investigation. Upon identification, the Homeless Liaison will submit a homeless tracking form to the Student Information Systems clerk to guarantee accurate coding.

#### **Information Dissemination**

The Homeless Liaison and/or Principals provide information to faculty and staff on the Homeless program annually. The Homeless Liaison distributes posters and brochures in the counselor's office and Parent Involvement Resource Room. Posters and brochures are also distributed to the community at DFACS, the Housing Authority, the Randolph County Health Department, the Post Office, and the Police Station.

#### **Transportation**

As with all students served in the Randolph County School System, transportation is provided for homeless students. Randolph County will transport homeless students to and from the school of origin, at a parent's or guardian's request (or at the local liaison's request for unaccompanied youth) if it is feasible. Parents may complete School of Origin Request Form (found in the Parent Packet). If the student is living outside the district of origin, the district where the student is living and the district of origin will determine how to divide the responsibility and cost, or they must share the responsibility and cost equally. Parents will be notified on the Written Notification Form, which includes a Disputes Resolution form if needed.

#### **Disputes (Complaint Procedures)**

Any individual, organization, or agency (complainant") may file a complaint with the Randolph County Schools if that individual, organization, or agency believes and alleges that RCSS is violating a federal stature 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 systematic or ongoing. The school must refer the parent, guardian, or youth to the local liaison to carry out the dispute resolution process as expeditiously as possible. Whenever a

dispute arises, the parent, guardian or youth will be provided with a written explanation of the school's decision, including the right to appeal.

While a dispute is being resolved, the student will be admitted immediately into the requested school and provided with services.

#### **Training**

The liaison or designee will conduct training and sensitivity/awareness activities for the LEA and school staff at least once each year. This may be virtual or in person.

#### **Coordination**

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

#### **Credit for Coursework**

The district recognizes that children and youth experiencing homelessness face unique challenges in accessing and succeeding in school. Homeless students, including those who have been out of school, can receive appropriate credit for full or partial coursework satisfactorily completed while attending a prior school. Every effort will be made to meet the unique needs of students. Counselors will check student information systems to review student's coursework and grades. The system will use the E2020 online learning program to provide independent study program that target specific learning gaps and allows students to work for credit, regardless of seat time. The academic coach will be responsible for monitoring progress and completion of assignments for partial or full credit.

## **Section 11: Services for Neglected and Delinquent Children**

## Services for Neglected and Delinquent Children (Neglected Set-Aside)

At the present time, there are no institutions located in Randolph County to provide services to neglected and delinquent children.

## <u>Prevention and Intervention Programs for Children Who are Neglected, Delinquent, or At-Risk (Title I, Part D)</u>

At the present time, there are no institutions located in Randolph County to provide services to neglected and delinquent children, therefore, Randolph County Charter School System does not receive Title I, Part D funding.

## **Section 12: Services for Children in Foster Care**

#### **Services for Children in Foster Care**

The Foster Care Program focuses on school access, improved educational outcomes, and enhanced academic stability for children and youth in foster care. The provisions derived from the Every Student Succeeds Act (ESSA) establish guidelines for recognizing and addressing the unique needs of foster care children and youth. The Foster Care Program has the responsibility of working closely with local child welfare agencies and local educational agencies to identify children and youth in foster care and to ensure the successful implementation of ESSA provisions.

Randolph County School System has identified the School Social Worker as the Foster Care Point of Contact. The Social Worker will assume responsibility for streamlined communication and collaboration with DFCS Case Managers and DFCS Point of Contact. The local Foster Care Transportation Plan will be reviewed/updated annually with coordination between the Title I Director, Foster Care Point of Contact and the DFCS Point of Contact. Such collaboration will ensure the smooth implementation of provisions outlined in ESSA to include: thoughtful best interest determinations; appropriate and timely transportation plans for children placed out of the area of their school of origin; and, immediate enrollment and records transfer.

## Section 13: Title II, Part A—Teacher and Leader Effectiveness

The Randolph County School System transfers 100% of Title II, Part A to Title I, Part A as part of consolidation of funds.

# Section 14: Title IV, Part A—Student Support and Academic Enrichment

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 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).

Randolph County School System transfers 100% of Title IV funds into Title I, Part A as part of consolidation of funds.

## Section 15: Title V, Part B—Rural and Low Income Schools

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

Randolph County School System currently receives RLIS grant funds. These funds are allocated to schools through the consolidated funding program and are monitored to ensure funds are meeting the intent and purpose of the program. Each year Randolph County Charter School System is required to submit an Annual Evaluation Report reporting the district's use of grant funds. Title V, Part B may fund activities authorized under any of the following federal formula grants including parent involvement activities:

- Title I, Part A (Improving Basic Programs Operated by LEAs)
- Title II, Part A (Improving Teacher Quality)
- Title III (Language Instruction for English Learners and Immigrant Students)
- Title IV, Part A (Student Support and Academic Enrichment Grants)
- Parental Involvement Activities

#### Procedure Used to Create and Submit the Annual Evaluation Report

Randolph County School System follows the directions provided by GaDOE to complete the Title V, Part B program's Annual Evaluation Report in the Consolidated Application each year. All districts that implemented Title V, Part B activities are required to complete the Annual Evaluation Report via the Consolidated Application. After adding Title V, Part B to the district's programs in the Consolidated Application, the Annual Evaluation Report can be accessed by selecting the Program Information tab, then the Data Collection tab. The data for this report must reflect the previous school year. The activities reported must match the activities reported on the Rural Education Initiative tab located under the Program Information Page submitted with the previous year's approved budget or the most recently approved budget amendment, if applicable. To complete the report, choose "yes" or "no" for each of the five activities indicating whether the LEA participated. The total amount expended must match the totals in Title V, Part B Program Completion Report. The program coordinator will submit the report to the superintendent for final sign off.

# Section 16: Title III, Part A—Language Instruction for EL (English Learners) and Immigrant Students

The purpose of Title III, Part A is "to help ensure that English learners (ELs), including immigrant children and youth, attain English proficiency and develop high levels of academic achievement in English." Due to the number of EL students currently enrolled in the district (which is currently zero), Randolph County School System does not qualify for direct funding. Therefore, Randolph County School System does not receive funding for supplemental Title III, Part A activities. RCSS will however, provide supplemental services to all English Learners and Immigrant Students who enroll in the district.

#### Student Identification and Entrance/Enrollment Procedures

During the registration process, a Home Language Survey is collected for each student. Each school in Randolph County School System engages in the identification and placement of English Learners and

Immigrant students by first ensuring that all students complete a Home Language Survey (HLS) in a language parents understand, prior to entry into school. For transfer students, an original HLS and applicable English Language Proficiency (ELP) screener and/or ELP assessment scores are reviewed by the school's registrar or counselor (in coordination with ESOL staff and/or the district's ESOL coordinator) to determine transfer students' English Learner status. Information from the HLS is used to identify students who may need English language instruction.

The questions in the survey are the following:

- 1. Which language does your child best understand and speak?
- 2. Which language does your child most frequently speak at home?
- 3. Which language do adults in your home most frequently use when speaking with your child?

The HLS also contains an additional question (noted below as #4) that is used to collect each family's preferred language for school communication. The question is not part of the "official HLS" and thus the response is not considered when determining whether to screen a student.

4. In which language would you prefer to receive school information?

For students enrolling in a U.S. school for the first time, if one or more responses on the HLS indicate a language other than English, a student is referred by the registrar or counselor (who reviews the enrollment form) to an ESOL teacher to be screened for language assistance services eligibility within 30 days of school enrollment.

- A potential English learner is identified when one or more of the responses to three language questions on the Home Language Survey include a language other than or in addition to English.
  - The ESOL teacher receives notification when a potential English learner enrolls.
  - The ESOL teacher is responsible for determining eligibility and ensuring language assistance services are scheduled for all eligible students.
- 2. An immigrant student is identified when through the Home Language Survey the place of birth is identified as a location outside of the United States and Puerto Rico, and the date that the student entered U.S. schools is less than three years ago. When a student was born outside of the U.S. and Puerto Rico and entered U.S. schools more than three years ago, interviews and student records are utilized to further identify eligible immigrant students in instances in which the student has completed less than three full years in U.S. schools.
  - A registration staff member contacts the Director of Federal Programs when the parent or guardian of a student who meets the Title III definition of an immigrant student arrives at the school to register.
  - The ESOL teacher makes personal contact and supports the family through the registration and enrollment process as needed and checks in with the family periodically to assist with any arising needs that may be unique to immigrant families.

For students in 2nd semester Pre-K through 1st semester Kindergarten, the Listening and Speaking components of the WIDA Screener for Kindergarten are administered. For students in 2nd semester Kindergarten through 1st semester Grade 1, all four components of the WIDA Screener for Kindergarten are administered. All four components of the WIDA Screener are also administered for potential ELs in their 2nd semester of Grade 1 through grade 12. These students are tested using the WIDA Online Screener on the DRC Insight platform. Scores from the respective screener, as well as the GaDOE's ESOL Eligibility Guidance, are then used to determine if a student has met eligibility for language assistance services. Parent Notification of ESOL services for Newly Qualified English Learners are sent to their parents/guardians within the first 30 days of school. Parents are not required to sign and return the parent notification form.

Language assistance services are provided through delivery models approved by the GaDOE and/or the district through its strategic waiver. Parents who decline services are provided with a Parent Waiver of Direct ESOL Services form that must be signed on an annual basis, but the students are still assessed on the ACCESS for ELLs in the winter. At any time, the parents/guardians may request reinstatement of supplemental language assistance services for the child.

Information regarding students identified to receive language assistance services is sent to the Director of Federal Programs and District Effectiveness Specialist/District Test Coordinator for proper placement and coding within the student information system. School leaders also receive the information and provide input into classroom placement.

The District Effectiveness Specialist (DES)/District Test Coordinator attends the state's annual Data Collection Conference (or the virtual Data Collections Academy) for updates in changes or requirements. Additionally, the DES attends the GaDOE Title III & ESOL professional learning series on ensuring accurate EL data entry. The DES is responsible for submitting comments to relieve any data collection errors.

Student participation and progress in the ESOL program is measured using the ACCESS for ELLs exam for students in grades K-12. English Learners (ELs) are assessed annually on the stateadopted English proficiency measure (ACCESS) to determine continued eligibility.

Parents have the right to select ESOL program services, remove their child from the ESOL program upon request, or decline ESOL services. After parents who have received notification of student eligibility for enrollment in the ESOL program, may request a waiver of services. Upon their request the DES or Federal Programs Director 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**

Randolph County School System utilizes the State of Georgia Exit Criteria from Language Assistance Services from the Georgia ESOL Resource Guide: Kindergarten Exit Flowchart and Grades 1-12 Exit Flowchart.

All EL students are evaluated by the District Test Coordinator and/or qualified designated school personnel each spring using the ACCESS for ELs assessment to determine the student's level of English language proficiency and continued placement in or exit from the ESOL program. Score reports are returned to the district approximately eight weeks after the test administration window closes. A copy of the Student Report will be placed in an ESOL file folder in the student's permanent record. Parent Reports are available in multiple languages on the WIDA website.

#### Kindergarten – EXIT CRITERIA

For purposes of exiting ESOL services, a Kindergarten student must score an Overall Composite Proficiency Level (CPL) of 5.0 or greater and Listening Speaking, Reading domain PL > 5, and Writing domain PL > 4.5 on the Kindergarten ACCESS.

#### **Grades 1-12 – EXIT CRITERIA**

As students reach proficiency and are ready to exit language assistance services, it is imperative that these students have attained a degree of proficiency that will enable them to achieve academic success at levels equal to those of their native English-speaking peers.

The criteria for grades 1-12 are:

- The Overall Composite Proficiency Level (CPL) is 5.0 or greater on the ACCESS. OR
- The EL Reclassification Team can convene for students scoring within 4.3-4.9. The EL Reclassification Team will complete a EL Reclassification Form to determine if student will exit EL.

English Learners with significant cognitive disabilities, are eligible for the GAA and are eligible for the Alternate ACCESS as determined by the IEP Team. The exit criteria for these students is a P2 two years consecutively or any other Alternate ACCESS score same score for three years consecutively, and IEP Team recommendations using the IEP reclassification form.

ELs with a Disability that precludes assessment in one or more language domains will be exited utilizing the Standardized Statewide English Learner Exit Procedures for English Learners with Disabilities whose IEP Precludes Assessment of One or More Language Domains on WIDA's ACCESS for ELLs or Alternate ACCESS Assessments.

#### **Funding**

Currently Randolph County Schools does not have the number of students receiving ELL services to receive direct funding.

#### **Professional Learning**

All core academic teachers in RCSS are required to take on-line courses which are provided by the District in Effective teaching strategies for EL students if they have an EL student in their classroom. Because Randolph does not have an ESOL teacher, the district will work with the consortium and GaDOE to access professional learning and other supplemental resources for English Learners.

#### Parent Engagement to Enhance/Supplement EL Students

As written in ESSA, all school districts that receive Title I, Part A funds must "implement an effective means of outreach to parents of English Learners" with the purpose of assisting them with being involved in the education of their children. ESSA further states that parents of English Learners (ELs) must be encouraged to actively participate in helping their children a) become proficient in English, b) "achieve at high levels within a well-rounded education", and c) "meet the challenging State academic standards expected of all students." Therefore, Title I law requires that parents of ELs be included in activities provided for all parents. The parent engagement activity related to the Title III funded supplemental language instructional program is monitored by the Title III/ESOL Coordinator through purchase orders, signed forms, and other evidence of distribution to students and families.

The Title I, Part A schools in Randolph County are required to hold an Annual Title I Parent Meeting to which all parents are invited. Parents of ELs who attend Title I schools are encouraged to participate in these events. Translated invitations to these meetings are sent to them and translated information documents are provided at the sessions. Breakout sessions designed specifically for parents of English Learners are offered at Title I schools during these required Annual Parent Meetings. Other regular parent meetings are scheduled throughout the school year for the purpose of gathering input from parents of ELs and for responding to their recommendations regarding their child(ren)'s progress, including but not limited to their development of English proficiency.

Randolph County provides additional opportunity for EL students to demonstrate success in increasing the English language proficiency (ELP) and student academic achievement of English Learner (EL) students by offering after-school tutoring and summer program (as determined by needs).

#### **Effectiveness Process**

Through the annual needs assessment conducted in the spring of each school year, the Randolph County School System determines the strengths and challenges of its programs, in

which schools, and for which EL students, based on ELP and academic data and student needs. The supplemental resource will be used to determine its effectiveness specifically with English Learners. RCSS currently has no English Learners enrolled.

#### **Records and Maintenance**

An individual folder is maintained for each student who has been identified as eligible to receive EL services. Each folder contains the following documentation: Home Language Survey, Notification of Services, ACCESS reports, Parent communication in home language and English, Monitoring of student progress both EL and EL M's, Placement records in home language and English, and any other pertinent documentation. These folders are maintained by the District Effectiveness Specialist through the two-year monitoring phase and then will be housed in a secure storage area, the permanent record, and in an electronic record. Registrars provide parents with a HLS upon registration. If any language other than English is indicated on this form, the registrar shall notify the DES and Federal Programs Director and the student will then be assessed with the WAPT for Kindergarteners and the WIDA Screener for Grades 1-12 to determine placement.

#### State and Federal Required Documentation

ESOL records are reviewed with a checklist to monitor the state and federal required documentation, as listed below:

- Original Home Language Survey (HLS) which is completed by a parent or legal guardian, in a language and format the family understands and/or documentation that the HLS was orally interpreted before completion with parent' signature and date.
- English Language (ELP) Screener Score Results which demonstrates initial eligibility for EL status, if the HLS indicated a language other than English. Dated documentation of the results of the ELP Screener are included.
- Copies of Annual ACCESS for ELLs Individual Score Reports which should include <u>each year</u>
   the student qualified as an English Learner.
- When Applicable: Parent Refusal or Waiver which is a form in parent's preferred language of communication and must include a signature and date provided by the parent.
- When Applicable: Documentation of Student's Exit from ESOL Program which includes the EL Reclassification Form when applicable for EL Exit Procedures.
- When Applicable: Documentation for Up to Two of Years of Monitoring which is applicable to EL=1 and EL=2 students.

#### **Other Required Documentation**

Other ESOL records are also maintained for the requirements listed:

• EL-TPC (Test Participation Committee) form is an Assessment requirement to

- document an EL's need for testing accommodation.
- Parent Notification for ESOL Language Program Services is an OCR requirement and is maintained in the event of an OCR review.
- When applicable, the Title I Parent Notification of Title I and/or Title III Services form is complete and maintained as a Title I requirement.
- When applicable, an individual ESOL Distance Learning Plan is developed (using the state recommended form) for every EL who is receiving distance learning to document requirements from the U.S. Department of Education. The requirements indicate that all ELs should receive language instruction services even when participating in distance learning. The form specifies how ESOL services will be provided based on ACCESS for ELLs data and teacher input/recommendation.

#### **Compliance Monitoring Protocols**

Once a student exits the ESOL program, the Federal Programs Director and DES will monitor the student's grades on progress reports and report cards for two years following exit from the language instruction educational services. The student will be coded as being monitored (year one or two) within the student information system, PowerSchool (and updates the student's status annually in PowerSchool). Intervention and supports are provided through the district's Multi-Tiered Systems of Support (MTSS). If intervention supports and progress monitoring are unsuccessful, and the student's academic difficulties are determined to be related to English proficiency rather than academic deficits or disability, a Student Support Team using the Reclassification Process may recommend redesignation to EL status with direct ESOL services. Following completion of the two-year monitoring period, a student may not return to direct EL status.

#### **English Learners with Disabilities**

For ELs with significant cognitive disabilities, who participate in the Alternate ACCESS for ELLs English Language Proficiency (ELP) assessment, their Individual Education Program (IEP) Team will serve as an EL Reclassification Team by completing the *EL Reclassification/IEP Team Rubric* for ELs. The IEP team may recommend exiting from EL status when the student has reached the following standardized threshold: Alternate ACCESS Overall CPL P2 (Emerging) for two consecutive years with IEP Team recommendation or any other Alternate ACCESS Overall CPL – the same score – for three consecutive years with an IEP recommendation. Once ELs with significant cognitive disabilities have exited the ESOL program, their progress toward IEP goals is monitored by the Special Education Director and their special education case manager to ensure that the student's English proficiency is not a barrier to their full participation in classroom instruction and assessment in English. The monitoring documentation is maintained in the exited student's permanent record. During the monitoring process, if the IEP Team determines that the student needs language assistance services again through the ESOL program, the IEP Team (with a 2<sup>nd</sup> language specialist) revisits the EL Reclassification decision.

#### **Academic and Assessment Records**

The District Test Coordinator/DES administers the assessments and maintains a record of the assessment results in each student's personal file. The core academic teachers monitor academic progress through PowerSchool, teacher communication, and Milestone ELA scores. The DES and Federal Programs Director meet with regular education teachers to review the results and to discuss expectations based on the WIDA Can Do Descriptors.

#### **Program Evaluation and Accountability**

The success of the ESOL instructional program will be measured by analyzing the results of ACCESS and other state mandated tests. Because of this analysis, differentiated instructional decisions will be made for individual students, including adjusting services if indicated. An annual Title III program evaluation will be conducted, and a report of findings completed. The report will describe the progress EL students have made in language acquisition and meeting specified annual content goals for EL subgroups. The report will also include the number and percentage of EL students attaining English proficiency. Finally, the report will include content area mastery of monitored students.

#### **Immigrant Program**

The Randolph County School System does not receive a Title IIIA Immigrant subgrant.

## Section 17: Title I, Part C—Education of Migratory Children

The Migrant Education Program (MEP) is a federally funded program designed to support comprehensive educational programs for migrant children to help reduce educational disruption and other problems that result from repeated moves. Randolph County School System is part of the non-MEP funded consortium.

The Parent Occupational Survey is embedded in the online registration for parents within Infinite Campus and is completed during registration and at the beginning of each year to assist in the identification of migrant students. The district's designated staff member, current ESOL Coordinator, reviews the SIS for any flagged responses. When at least one "yes" and one or more of the boxes from 1 to 7 is/are checked, the Title I Director will email, always through the DOEs Portal, occupational surveys to the Regional Migrant Education Program Office serving Randolph County. Randolph County School System currently has no students identified as migrants.

## Section 18: Elementary & Secondary Emergency Relief (ESSER) Funds

In response to the economic outcome of the COVID-19 pandemic in the United States, Congress passed three bills that provided immediate and direct financial assistance to state and local educational

agencies through the Elementary and Secondary School Emergency Relief funds. These funds were provided to support areas with the greatest need, where the academic and non-academic components of school districts had the most significant impact due to COVID-19. As additional funding was provided, the funds were intended to support state and local school districts' efforts to safely reopen schools, address significant gaps in learning, and support measures of implementation that will continue to reduce the effects of COVID-19 on students and families.

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

- The LEA must reserve at least 20 percent of funds to address learning loss by implementing
  evidence-based interventions and ensure that those interventions respond to students' social,
  emotional, and academic needs and address the disproportionate impact of COVID-19 on
  underrepresented student subgroups.
- Remaining LEA funds may be used for a wide range of activities to address needs arising from
  the coronavirus pandemic, including any activity authorized by the ESEA, the Individuals with
  Disabilities Education Act (IDEA), Adult Education and Family Literacy Act (AEFLA), or Carl D.
  Perkins Career and Technical Education Act of 2006 (Perkins CTE).
- Maintenance of Equity: The ARP contains LEA maintenance of equity requirements for FYs 2022 and 2023.

#### **LEA Safe Return to In-Person Instruction Plan**

An LEA that receives ARP ESSER funds must publicly make a plan for the safe return to in-person instruction and continuity of services on its website. Before making the plan publicly available, the LEA must seek public comment on the plan.

#### Use of ESSER funds for minor or major construction projects

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

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

- Submit all required documentation complying with state law regarding Public Works Construction Projects. O.C.G.A. 36-91-20, 36-91-21, and 36-91-22
- Revise or withdraw any state capital outlay funded projects where ESSER funding was utilized.
- Verify that the construction project will be completed by the end of the grant period
- Submit required documentation adhering to the Davis Bacon Wage Requirement for all federal contracts and subcontract over \$2,000 for construction, alterations, repairs, painting, and decorating.
- Submit applicable required documents that follow federal construction regulations. 34