

Lanier County Schools

Federal Programs Written Procedures



2025-2026

TABLE OF CONTENTS

Purpose of This Handbook	3
Federal Program Staff	3
Overarching Requirements for All Federal Programs	4
LEA Monitoring of Schools and Programs	4
Ethics, Fraud, Waste and Abuse, and Corruption	8
Complaint Policy and Procedures	9
CLIP and Schoolwide/Targeted Assistance Plans	11
Services to Eligible Private School Children Maintenance of Effort (MOE) and Comparability, Assessment Security	17
MOE	19
Comparability	21
Assessment Security & Reporting of Accountability	21
Internal Controls, Expenditures, Inventory, Drawdowns, Cost Principles-All Programs	23
Written Allowability Procedures	24
Segregation of Duties	27
Written Procurement Procedures	25
Written Method for Conducting Technical Evaluations of Competitive Proposals & Selecting Recipients	27
Written Conflict of Interest Policy	30
Written Personal Compensation Policies (Time and Effort to include salaries, substitutes, and stipends)	31
Written Travel Policy	
Suspension and Debarment	32
Inventory Cash Management and Drawdowns	33
Individual Federal Programs	38
Title I-Part A	38
Within District Allocation Procedures	38
Reservation of Funds	39
Services for Homeless Children and Youth	39 & 41
Professional Qualifications	45
Right to Know	45
20-Day Notifications	45
Title I, Part A - School Improvement Grants under Section 1003(a) and 1003(g) of the Elementary and Secondary Education Act of 1965 (ESEA)	49
Title I, Part C – Education of Migratory Children	49
Title I, Part D – Programs for Neglected or Delinquent Children	50
Title II, Part A – Supporting Effective Instruction	50
Title III, Part A – Language Instruction for English Learners and Immigrant Students	52
Title IV, Part A – Student Support and Academic Enrichment	53
Title IV, Part B – 21 st Century Community Learning Centers	53
Title V, Part B – Rural Education Initiative	54
Title IX, Part A – Education for Homeless Children and Youth	55
Individuals with Disabilities Education Act (IDEA)	55
Coronavirus, Aid, Relief & Economic Security (CARES) Act	56
Coronavirus Response & Relief Supplemental Appropriations (CRRSA) Act	56
American Rescue Plan (ARP) Act	56
Transferability of Federal Funds	57

Purpose of This Handbook

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

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

The information included in this handbook is applicable to the following federal programs. The programs for which Lanier County Schools receives funds are listed in ***bold, italics***:

- ***Title I, Part A – Improving the Academic Achievement of the Disadvantaged***
- Title I, Part A – Parent and Family Engagement
- Title I, Part A – Foster Care Program
- Title I, Part A - School Improvement Grants under Section 1003(a) and 1003(g) of the Elementary and Secondary Education Act of 1965 (ESEA)
- ***Title I, Part C – Education of Migratory Children***
- Title I, Part D – Programs for Neglected or Delinquent Children
- ***Title II, Part A – Supporting Effective Instruction***
- Title III, Part A – Language Instruction for English Learners and Immigrant Students
- ***Title IV, Part A – Student Support and Academic Enrichment***
- Title IV, Part B – 21st Century Community Learning Centers
- Title V, Part B – Rural Education Initiative
- Title IX, Part A – Education for Homeless Children and Youth
- ***Individuals with Disabilities Education Act (IDEA)***

ESSER Programs

- ***Coronavirus, Aid, Relief & Economic Security (CARES) Act***
- ***Coronavirus Response & Relief Supplemental Appropriations (CRRSA) Act***
- ***American Rescue Plan (ARP) Act***

Federal Programs Staff

Gene Culpepper, Superintendent

gene.culpepper@lanier.k12.ga.us

Kelly Newsome, Assistant Superintendent of Federal Programs

kelly.newsome@lanier.k12.ga.us

Faletta Acoff, Assistant Superintendent of Student Services

faletta.acoff@lanier.k12.ga.us

Kristin Doyon, Assistant Superintendent of Curriculum & Instruction

kristin.doyon@lanier.k12.ga.us

Charlie Bennett, Assistant Superintendent of Finance

charlie.bennett@lanier.k12.ga.us

Cheryl Powell, Homeless & Foster Liaison

cheryl.powell@lanier.k12.ga.us

Summer Ballard, Administrative Assistant

summer.ballard@lanier.k12.ga.us

Overarching Requirements for All Federal Programs

LEA Monitoring of Schools and Programs

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

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

LEA/Program Directors will conduct self-monitoring of its schools and programs sufficient to ensure compliance with Title Program requirements, including Title I, Part A: Improving the Academic Achievement of the Disadvantaged; Title I, Part C: Education of Migratory Children; Title I, Part D: Neglected & Delinquent; Title II, Part A: Supporting Effective Instruction; Title IV, Part A: Student Support and Academic Enrichment; Title IX, Part A: McKinney-Vento Homeless Assistance Act; the Individuals with Disabilities Education Act (IDEA); and Elementary & Secondary School Relief Funds (ESSER): Section 18003 of Division B of the Coronavirus Aid, Relief, and Economic Security (CARES) Act; Section 313 of the Coronavirus Response and Relief Supplemental Appropriations (CRRSA) Act, 2021 and Section 2001 of the American Rescue Plan (ARP) Act.

Federal Program Staff will undergo training from GaDOE and other sources to maintain proficiency in federal programs compliance requirements.

Federal Program Staff will provide technical assistance to local schools.

Federal Program self-monitoring will include monitoring all program expenditures to verify that all program expenditures comply with Federal Program requirements.

Federal Program Staff will maintain all documentation the LEA may need for future auditing/monitoring per the LEA Monitoring Form, which is issued annually by GaDOE.

In years when the LEA does not receive an on-site visit, Federal Program Staff will complete the Self-Monitoring Checklist and submit it to the Georgia Department of Education (GaDOE), if applicable.

LEA will undergo monitoring by GaDOE on a four-year cycle. LEA/Program Director(s) will participate in training and technical assistance updates as provided by GaDOE prior to monitoring visit.

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

Monitoring is an essential component of ensuring that all facets of federal programs are being implemented as prescribed by the Every Student Succeeds Act (ESSA). It is a process of systematically providing technical assistance and collecting data to provide information that can guide program implementation. Monitoring of federal programs is conducted to ensure that all children have a fair, equal, and significant opportunity to obtain a high-quality education. Monitoring emphasizes accountability for using federal resources wisely.

The Lanier County School System Federal Programs Department makes use of monitoring as a means of regular observation and recording of activities taking place in schools. Critical to this process is the feedback provided to schools that can assist in improving student academic achievement. District monitoring addresses the following:

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

ESEA, as reauthorized by ESSA, requires the State Educational Agency (SEA) to monitor the implementation of program requirements and the expenditure of federal funds. Monitoring by the Georgia Department of Education (GaDOE) consists of five major components:

Program Requirements

LEAs must submit for approval the Consolidated LEA Improvement Plan (CLIP) through the consolidated application process. Federal Programs staff review each CLIP to ensure that the plan contains allowable activities for use and budgeting of federal funds. Once the CLIP has been approved, the LEA submits a budget reflecting the approved CLIP activities for review and approval by the Federal Programs staff assigned to the LEA. The LEA updates its CLIP under ESSA, as needed, to reflect changes, and submits the updated CLIP to the SEA for review and approval. Updates to the CLIP are typically performed on an annual basis.

Monitoring of Expenditures

Local Educational Agencies (LEAs) must submit for approval an annual set of budgets through the consolidated application process. Federal Programs Staff review each approved CLIP and program budget to ensure that expenditures are appropriate under program-specific federal guidelines and Uniform Grants guidelines before approving the budget. Once budgets are approved, Federal Programs staff track funds drawn down by LEAs for expenditures to ensure that LEAs are likely to meet the drawdown of funds timelines.

ESSER Plans

ESSER Plans will be monitored during monthly meeting between the finance director and federal programs director, during monthly District Leadership Team Meetings (DLT), & Quarterly District Professional Learning Community meetings (DPLC). Stakeholders will be given opportunities to provide feedback during District Parent Advisory Council meetings and BOE meetings. The plan will be reviewed and revised as needed, but at least every 6 months.

On-Site Monitoring

A SEA on-site cross-functional monitoring team visits a LEA to review the criteria included in the LEA monitoring rubric.

Self-Monitoring

The LEA self-monitoring process is an outgrowth of the on-site monitoring process of the cross-functional team. It is designed to provide LEAs the support and guidance needed to maintain ongoing high standards for compliance and program delivery by conducting a self-monitoring of compliance with federal law for each fiscal year that the LEA does not participate in the cross-functional on-site team monitoring process. LEAs not receiving an on-site visit may complete the Self-Monitoring Checklist and submit it to the GaDOE.

Monitoring of Use of Funds

The Federal Programs Director meets with the Finance Director monthly to monitor the budget. The Federal Programs Director communicates budget needs and/or concerns with the schools during monthly District Leadership Team Meetings.

Position(s) Responsible for the Implementation and Monitoring

The Federal Programs Director(s) is the position responsible for the implementation and monitoring of all federal programs, with the exception of IDEA and Title I, Part C, in Lanier County Schools. The Director of Special Education is responsible for implementing and monitoring IDEA (including procedures for Child Find, Evaluation/Re-Evaluation, Eligibility & Discipline-See SPED Procedures Manual) and Title I, Part C. The Finance Director assists the Federal Programs Directors(s) with monitoring ESSER- (CARES, CRRSA, and ARP) funds. The Federal Programs Director(s) will undergo training from GaDOE and other sources to maintain proficiency in the Title programs compliance requirements. The Federal Programs Director(s) will provide technical assistance to local schools. The Federal Programs Director(s)'s self-monitoring will include monitoring all program expenditures to verify that all program expenditures comply with all Title Program requirements. The Federal Programs Director(s) will maintain all documentation the LEA may need for future auditing/monitoring according to the LEA Monitoring Form, which is issued annually by GaDOE.

Accountability

Audits and Cross-Functional Monitoring Findings

The Lanier County School System undergoes regular audits as scheduled by the Georgia Department of Audits. Corrective action plans are created to correct 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 Federal Programs Director will review all items. The Cross-Functional Monitoring report will be pulled from the GaDOE website under the Consolidated Application.
- Each item will be examined carefully, and a team of district level staff will determine the best means of corrective action.
- Items are gathered, and a report is written by the Federal Programs Director.
- The report is submitted to the Superintendent.
- The completed report is then sent to the GaDOE/state auditors as a means of resolution.
- The district has 30 days from the receipt of the findings to respond to the GaDOE.
- The monitoring process and the resolution process are both used as a learning resource.

Reporting and Corrective Action Process (Audit and Monitoring Findings)

Corrective action from previous monitoring is discussed with principals to assist them in understanding the critical need for compliance with all Federal Programs.

Communication and Monitoring of Schools and Programs

Monitoring of Title I schools is a critical component of ensuring that compliance is taking place at each school. During the summer prior to the beginning of the new school year, the district Federal Programs Director convenes a meeting with system and building level administrators to provide training on policies, procedures, and guidance for operating federal programs, including the Title I program.

Administrators are given detailed information on expectations and copies of program guidance. Specific training is provided in all facets of federal programs. Information provided includes timelines, budget forms, inventory information, schoolwide implementation, Flexible Learning Plans (FLPs), Intradistrict transfers, family & community engagement guidelines, fraud, waste and abuse policy, internal controls, and other areas of federal programs as appropriate. Monthly District Leadership Team (DLT) meetings are held with all district administrators, including Title I principals and program directors to provide monitoring and technical assistance for federal programs support. Principals lead monthly school level meetings to provide guidance and maintain compliance at the school level. Information gathered at the meetings provides schools with data to determine the impact of implemented programs on an on-going basis and used as additional support for the needs assessment conducted in the spring each year. District Professional Learning Community (DPLC) meetings are held at the end of each nine weeks for principals to share data, best practices, and determine next steps for improvement. Phone calls and emails are a frequent occurrence between the federal programs staff and system staff.

In addition to meeting with principals, the Federal Programs Director communicates with the finance department staff and the Parent and Family Engagement (PFE) Coordinator throughout the year. The district PFE Coordinator also communicates with community stakeholders and parents. These communications are an opportunity to discuss federal programs in detail and also an opportunity to discuss content specific information with each of the above. All Title I services are supplemental. This process is monitored through on-going technical assistance, site visits, and through the budgeting process.

Identification of High-Risk Schools

The Lanier County School System uses the list of Comprehensive Support and Improvement (CSI) and Targeted Support and Improvement (TSI) schools provided by the GaDOE as an identification process for high-risk schools. We currently do not have any CSI or TSI schools in Lanier County. If no schools are on the list, the district uses CCRPI scores, CCRPI indicators data, and/or root cause analysis to determine schools that are high-risk.

Timeline for Assistance and Monitoring

All staff responsible for ensuring the implementation and compliance of federal program guidelines maintain continual communication with schools through meetings, on-site visits, emails, phone calls, and memos to ensure appropriate actions are completed within program guidelines. TA meetings occur as needed with school teams, district teams, principals, & district leaders.

Financial Monitoring

- Superintendent will review federal and local budgets with principals at monthly DLT meetings September – April. DLT agendas and sign in sheets will be kept.
- The Federal Programs Director will provide TA for Federal Programs at monthly DLT meetings. DLT agendas and Sign-In Sheets will be kept.
- Federal Programs Director and Finance Director will meet monthly to review Federal Program budgets September-April. Budget documents, agendas and sign in sheets will be kept.

- The Federal Programs director will provide TA for principals & Finance Director as needed throughout the year. Emails or agendas & sign-in sheets will be kept.

Technical Assistance

Technical Assistance is offered on-going through e-mail and phone communication, as well as, through school visits to assist schools in analyzing data to identify priorities in instruction, professional learning, and effective budgeting. Prior to the school start, a meeting is held with system and building level administrators that reviews the purpose of all federal programs, including the expectations and procedures related to allowable use of funds. On-going information is provided at monthly DLT meetings to remind principals of information as the year progresses. The Federal Programs Director maintains a file of all training conducted throughout the year. This file contains all staff training, handouts, meeting agendas, meeting notes, etc. Ongoing monitoring continues after training is conducted by the Federal Programs Directors to ensure compliance.

Ethics, Fraud, Waste and Abuse, and Corruption

The Federal Programs Director reviews the ethics, fraud, waste and abuse, and corruption policies with all administrators throughout the year (as applicable) during monthly DLT meetings. Agendas and sign in sheets will be kept by the Federal Programs Director to document this has been completed. Principals and Central Office Directors discuss the same information with their staff. Each principal or Director submits agendas and sign-in sheets to the Federal Programs Director to verify the policies have been reviewed with all staff. Principals are expected to inform their faculties about policies and updates as they are approved throughout the year.

Ethics

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

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

Reporting Suspicion of Fraudulent Activities

Purpose:	To ensure the reporting of suspicion of fraudulent activity, the Lanier County Schools provides employees, clients and providers with confidential channels for such reporting.
Definitions:	Fraud: A false representation of a matter of fact, whether by words, by conduct, or by concealment of that which should have been disclosed, that is used for misappropriating property and/or monetary funds.
Statement of Administrative Regulations:	The Lanier County Schools thoroughly and expeditiously investigates any reported cases of suspected fraud to determine if disciplinary, financial recovery, and/or criminal action should be taken.

- Confidentiality:** All reports of suspected fraud must be handled under the strictest confidentiality. Only those directly involved in the investigation should be provided information regarding the allegation. Informants may remain anonymous but should be encouraged to cooperate with investigators and should provide as much detail and evidence of alleged fraudulent acts as possible.
- Procedures and Responsibilities:**
1. Anyone suspecting fraudulent activity should report their concerns to the Lanier County Schools Superintendent or his/her designee at (229) 482-3966.
 2. Any employee with the Lanier County School System (temporary staff, full-time staff and contractors) who receives a report of suspected fraudulent activity must report this information within the next business day.
 3. Employees have the responsibility to report suspected fraud. All reports can be made in confidence.
 4. The Lanier County Board of Education shall conduct investigations of employees, providers, contractors, or vendors.
 5. If necessary, the person reporting will be contacted for additional information.
 6. Periodic communication through meetings should emphasize the responsibilities and channels to report suspected fraud.

Complaint Procedures

An organization or individual (“complainant”) may file a formal complaint alleging a violation of ESSA, *Every Student Succeeds Act* of 2015 against a Georgia school district, 21st Century Community Learning Center (21st CCLC) program, or the Georgia Department of Education (GaDOE) itself.

Why File a Formal Complaint?

The formal complaint process provides an opportunity for organizations and individuals to report possible ESSA violations. Prior to filing a formal complaint, GaDOE encourages individuals to read the frequently asked questions (*FAQs*) which provide additional information regarding the complaint process. FAQs can be accessed on the Federal Programs page of the GaDOE website.

What is Included in a Formal Complaint?

The complaint must include:

- The complainant’s contact information (name, address, phone number, and email address);
- The date(s) on which the alleged violation(s) occurred and the date(s) on which any school district, 21st CCLC program, or GaDOE action or decision regarding the alleged violation was issued, if applicable;
- The facts and documentation on which the complaint is based;
- The specific federal requirement allegedly violated (include citation to the federal statute or regulation, if known);
- Documentation or an explanation of efforts to resolve the complaint;
- Contact information for other individuals who can provide additional information, if applicable (name, telephone number, address, and email address);
- Whether a complaint has been filed with any other agency and, if so, which agency; and
- A proposed resolution to the complaint.

When May a Formal Complaint be Filed?

A formal complaint may be filed when an organization or individual believes that a recipient of funding has violated a requirement of a federal statute or regulation related to the administration of a program. 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. The federal ESSA programs for which formal complaints may be filed and investigated are:

- Title I, Part A – Improving Basic Programs Operated by Local Educational Agencies
- Title I, Part A – School Improvement Grants, referred to as 1003(a) and 1003(g)
- 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 – Language Instruction for English Learners and Immigrant Students
- Title IV, Part A – Student Support and Academic Enrichment
- Title IV, Part B – 21st Century Community Learning Centers
- Title IX, Part A – McKinney-Vento Education for Homeless Children and Youth
- ESSER Emergency Relief Fund CARES Act, CRRSA Act, & ARP Act

McKinney-Vento Homeless Assistance Act

A parent, guardian, or unaccompanied youth may also file a complaint under Title IX, Part A – the McKinney-Vento Homeless Assistance Act, and the process for filing a complaint is the same as it is for the ESSA federal programs. Unique to the McKinney-Vento Homeless Assistance Act, however, is the GaDOE's role in also resolving disputes regarding a final decision over eligibility, school selection or enrollment in a school made at the school district level. Each school district must have a McKinney-Vento dispute resolution process to address issues regarding eligibility, school selection or enrollment in a school. If the parent, guardian, or unaccompanied youth disagrees with the school district's decision and the school district's appeal process has been exhausted, a request may be filed within 10 business days for the GaDOE to review the final decision of the school district.

Equitable Services

Formal complaint procedures regarding a school district's or a 21st CCLC program's equitable services for children attending private school are found on the [State Ombudsman](#) webpage.

How is a Formal Complaint Filed?

Complaints are best filed electronically through GaDOE's secure online complaint link. Supporting documentation should be provided, if applicable and available.

GaDOE Online Complaint Link: <http://programcomplaint.doe.k12.ga.us/everestwebportal/webform.asp>

A formal complaint may also be mailed to the following address:

Georgia Department of Education
Federal Programs Director
205 Jesse Hill Jr. Drive SE
1854 Twin Tower East
Atlanta, Georgia 30334

General Complaint Investigation Overview

Once GaDOE receives the complaint, the federal programs director will review the matter to determine if it is properly before GaDOE. If so, the Federal Programs director or his or her designee will conduct an investigation and examine all pertinent information. The investigation may include confirmation of details; clarification of the issues; interviews with the person filing the complaint, the school district or 21st CCLC program, GaDOE program staff, or other individuals; observations; on-site visits; and other activities as determined by the nature of the allegation. The general complaint investigation time frame is 30 days.

The following are some general actions that take place during a complaint investigation:

- The assigned GaDOE staff member notifies and works with the school district, 21st CCLC program, or GaDOE program to understand and resolve the complaint.
- If appropriate, opportunities to submit additional information are given to the complainant once GaDOE staff has received the response from the school district or 21st CCLC program.
- Within 30 days of the receipt of the complaint, the GaDOE will issue a written decision to the complainant and the school district or 21st CCLC that addresses each allegation in the complaint and contains, if appropriate, findings of fact and determinations of compliance or noncompliance. Please note that the timeline may be extended to accommodate for mediation or other extenuating circumstances with respect to a complaint.
- If there is a violation of the law or regulations, a resolution will be required. The resolution may include technical assistance activities, corrective actions, or both to achieve compliance.
- If the complainant and the school district or 21st CCLC program resolve the complaint before the GaDOE investigation is complete, the complaint will be closed without making a determination regarding compliance.

Dissemination for Complaint Procedure

The Lanier County School System's district policy concerning complaint procedures is presented to all employees during pre-planning of the school year. Policies provide all employees/staff and stakeholders with confidential channels to report complaints. Complaint procedures outline how any individual, organization, or agency may file a complaint. Employees sign a copy of the policy with a statement to show they have received the regulation training. The complaint procedures include administrative regulations for reporting, filing, and appealing complaints.

Consolidated LEA Improvement Plan (CLIP) and Schoolwide/Targeted Assistance Plan(s) (SWP/TAP)

Annual Needs Assessment Process

The Lanier County School System conducts its annual Comprehensive Needs Assessment in the spring of each year in collaboration with principals, teachers, paraprofessionals, and other school personnel, parents, and community and business leaders.

In addition, input on areas in need of improvement is solicited from school and district leaders by email and during monthly DLT meetings. Feedback is also solicited from parents during the annual Title I meeting, monthly school leadership meetings, and from community stakeholders through surveys and civic groups. Surveys are open to all administrators, teachers, certified support faculty, staff, paraprofessionals, parents, and community members. Information gathered from these various sources is discussed and decisions are made on areas of focus by district leaders at the Data Retreat and DLT meetings. Supporting documentation is kept on file by the Director of Federal Programs and the PFE Coordinator for each required component in support of the data summary and needs analysis provided. This data is gathered, reviewed and used to determine the needs that will be reported in the CLIP and Equity Action Plan, which will guide the selection of strategies to be included in the budget.

The Lanier County School System utilizes a variety of data sources to make decisions that will affect student learning and teacher effectiveness. Our needs assessment process includes examining student achievement data, perception data from staff, student, and stakeholder surveys, professional learning plans, teacher recruitment and retention data, professional qualification and in-field data for certified and classified staff, class size data, peer observation data, TKES data, and verbal input from stakeholders. In March, each school conducts a Comprehensive Needs Assessment Stakeholder meeting that includes parents, teachers, paraprofessionals, administrators, community members, and other support staff. Once the input is collected from the schools, a

series of meetings are held at the school and district level to consider all the prior stakeholder input and data to make decisions regarding prioritized needs and equity concerns. Stakeholders participating in our needs assessment process include all members of the district administrative team, administrators and teachers from each school, paraprofessionals, instructional lead teachers, counselors, parents, community members, and higher education representatives. The results of this needs assessment determine any prioritized areas of need/inequity and guide the development of plans and expenditure of funds.

Comprehensive LEA Improvement Plan (CLIP)

Section 1112 of the Title I, Part A of the Every Student Succeeds Act (ESSA), which reauthorizes the Elementary and Secondary Education Act of 1965 (ESEA) and No Child Left Behind (NCLB) specifies that local educational agencies (LEAs) may receive funds under ESSA if the LEA has an approved plan on file with GaDOE. The LEA plan is submitted as part of a Consolidated Application in an on-line application.

Guidance to Schools/Departments

All components of the CLIP (*System Comprehensive Needs Assessment, District Improvement Plan, Foster Care Transportation Plan, Parent and Family Engagement Policy, and Title I, Part C Identification & Recruitment Plan*) are required prior to the district receiving funding from state and federal programs. CLIP revisions take place annually in late spring or early summer and are submitted according to the GaDOE Federal Programs Year-At-A-Glance timeline. Using prior year data and needs assessment information, the plan is reviewed and updated for the upcoming school year. The CLIP serves as the plan detailing coordination of various federal programs and identification of needs which in turn assists budgeting for such needs with federal funds. System and building level leaders, teachers, support staff, as well as, community and parent stakeholders are involved in the revision process. Parents are sent information inviting them to participate via mail, email, telephone, newspaper, social media, flyers, website, and newsletters. The district conducts an annual meeting each year that allows parents the opportunity to provide input on district policies and procedures. Parent input is examined and considered from these meetings.

Documentation includes sign-in sheets, agendas, presentations, meeting minutes, emails, written responses, and returned plans with comments. Strengths and weaknesses are determined and results are kept on file. Several subsequent meetings are arranged to garner input from all stakeholders. For example, input is solicited from district and school leaders at monthly DLT meetings. Input is also sought from system and school leaders, parents, and community stakeholders during the annual leadership data retreat held in June. The Federal Programs Director gathers all input and updates the CLIP. The plan is submitted to the Superintendent for final approval and submission to the GaDOE.

Upon approval from the GaDOE, the Plan is implemented in the district. If not approved, the program director reviews the comments via SLDS. Applicable stakeholders are contacted if needed. Revisions are made and the plan is resubmitted to the GaDOE in a timely manner. Information is shared with applicable stakeholders at meetings such as DLT, School Leadership meetings, and Parent Engagement meetings.

LEA Guidance

Technical assistance and support are provided to all schools in the areas of the annual needs assessment, comprehensive planning, implementation, and ongoing evaluation of each improvement plan. On-site meetings are held with principals to discuss the status of their plans regarding improvement components. Items missing or in need of revision are marked on the plan and then rechecked when the revised plan is submitted. The system will also include parents in its annual review process. Copies of agendas and sign-in sheets from such

meetings should be collected and stored by the Federal Programs Director as evidence and documentation of meetings. As previously stated, system leaders support schools in developing, revising, implementing and coordinating school improvement/schoolwide plans during monthly DLT meetings and quarterly DPLC meetings. During these meetings, data is analyzed to identify and develop solutions to challenges related to instructional strategies, parent involvement, professional learning, and budgets.

Development of New Schoolwide Programs

All schools in the Lanier County School System are Schoolwide Title I Program schools.

Schoolwide Program Plan Development

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

Plan Consolidation

The Lanier County School System does utilize the Schoolwide and School Improvement plan online template provided by the GaDOE through the State Longitudinal Data System.

Data Review

Data is compiled, reviewed, and discussed during District Leadership Team meetings, District Professional Learning Community meetings, Board of Education meetings, as well as, meetings held at the school level. Schools meet and analyze data with the intent of improving instruction. Principals review data with their leadership teams to identify and address areas in need of improvement. All Title I schools provide data, paper or electronic, as well as post data that are used during the data analysis process. School leaders discuss this information with all staff to ensure they fully understand the data presented. Principals work with district and school leadership teams to determine root causes. These root causes are detailed in the CLIP/SIP and are used to help identify high-risk schools, subgroup populations, and/or specific content areas in need of additional support.

Review and Approval Process

Lanier County School District Administrators are responsible for conducting an annual review of the CLIP, at which time revisions are made. The Lanier County School System is committed to cultivating and sustaining partnerships with parents and community stakeholders, and encourages their participation in development, implementation, review, and evaluation of its Comprehensive LEA Improvement Plan (CLIP), including all received documents. Parents are provided multiple opportunities to be involved in the development and revision of the Lanier County School System CLIP. These opportunities include access to the CLIP and meetings held throughout the year to provide feedback and input. Once all documents required as part of the CLIP have been uploaded in the GaDOE portal, all district directors are provided the opportunity to review and make any final changes before the CLIP documents are submitted for approval to the GaDOE.

Resolution for Unapproved Plans

If the GaDOE requests revisions or sends notification that a plan was unapproved, the Federal Programs Director takes the following steps until the district's plan has been approved by the GaDOE.

- The Federal Programs Director reviews requested changes/comments from GaDOE via SLDS online application.
- The Federal Programs Director contacts GaDOE Program Area Specialists as needed.
- The Federal Programs Director collaborates with internal stakeholders if needed.
- The plan is re-submitted to the GaDOE for approval.
- Once the CLIP has been approved, the compiled improvement plans are distributed within departments, schools, and the community.

CLIP & SWP/SIP Timeline (For all meetings, agendas, handouts, & sign-in sheets will be kept)

January-February

- District Leadership Team reviews the program guidelines

March-May

- Parent (Federal Programs Director), Student (Principals), & Staff (Curriculum Director) surveys are conducted to gather input for the CNA and CLIP/SIP development
- Federal Programs Director & Principals will coordinate school & district stakeholder team meetings to conduct CNA for all schools and district to evaluate program effectiveness and review current data: student achievement, process, & perception data.
- Federal Programs Director, PFE Coordinator, and Principals will coordinate school and district level stakeholder team meetings to finalize SIPs & CLIP that include PFE Policy/Plan/Compacts, Equity Plans.
- Needs are prioritized according to program requirements and goals
- Plan is developed inclusive of strategies, timelines, evaluations, etc.
- Principals will conduct universal screenings to identify student needs and monitor student progress.
- ESSER Plan review/revision

June/July

- Principals will submit SIPs to the Federal Programs Director for review and approval.
- Federal Programs Director will review SIPs for approval and/or revision
- The Federal Programs Director will require revision/resolution by Principals for unapproved SIPs.
- The Federal Programs Director will submit CNA & CLIP/DIP to the DOE for approval.
- The Federal Programs Director collaborates with school and district level leaders to develop implementation & monitoring plans for SIPs and CLIP/DIP.
- Certification Status review of all personnel

August/September

- Federal Program Director coordinates revisions to the CLIP (if requested from GaDOE) and resubmits for approval.
- The Federal Program Director disseminates approved plans to all stakeholders.
- Principals disseminate Student Handbook and other required notices to parents (ESOL, EL, Title IA, Title I-C, etc...)
- Principals complete and send 20-day notifications as needed.
- Schools conduct universal screenings to identify student needs and monitor student progress.
- The Personnel Director develops certification plans and meets with applicable personnel.
- ESSER Plan review/revision

October/November

- Principals coordinate Annual Title 1 meetings held at each school.

- Federal Programs Director coordinates DPLC meetings to review Q1 progress on SIPs and CLIP implementation.

December/January

- Federal Programs Director coordinates DPLC meetings to review Q2/Mid-Year progress on SIPs and CLIP implementation
- Principals conduct universal screenings to identify student needs and monitor student progress
- Personnel Director coordinates meetings to review Certification Plans for applicable personnel

Selecting Evidence Based Interventions

Evidence Based Interventions will be selected using the “Lanier County Supplemental Program Adoption Process” as outlined in the graphic below (adopted December 2021). Interventions selected must have evidence to show that they are effective at producing results and improving outcomes when implemented.

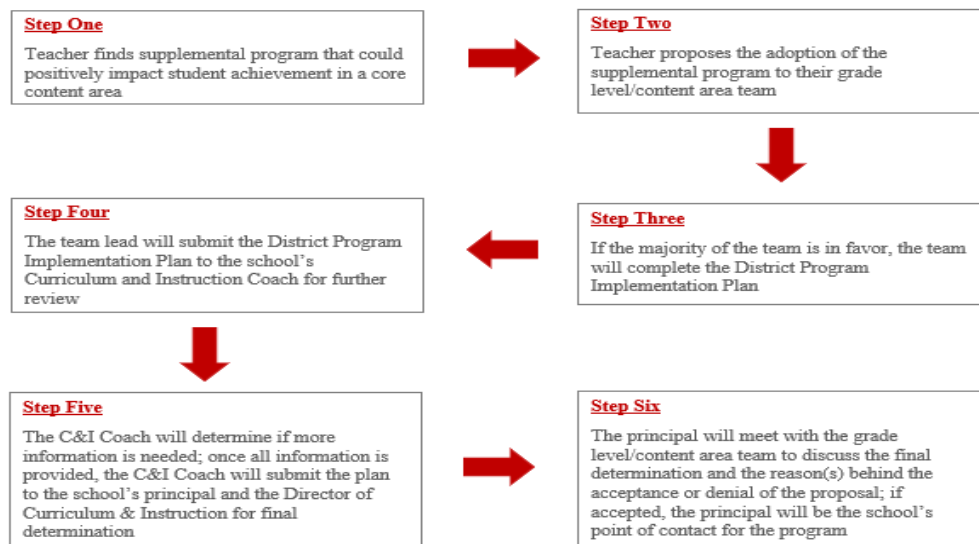
Lanier County Supplemental Program Adoption Process

Department of Curriculum & Instruction

OVERVIEW & PURPOSE

The purpose of this process is to ensure that Lanier County Schools are implementing and sustaining effective stewardship of community resources that promote student achievement.

Process for Adopting Supplemental Resources



If a C&I Coach, a school administrator, or a district administrator wishes to adopt a supplemental program, they will begin with Step 3

Evaluating Intervention Effectiveness

The effectiveness of an intervention's effectiveness will be determined using the “Lanier County Schools Program Effectiveness Rubric” (adopted November 2021).

Pre-Kindergarten Programs

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

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

Consolidation of Funds

Lanier County Schools *does* consolidate federal funds. Title II, Part A (100%) and Title IV, Part A (100%) are transferred into Title I, Part A. School Allocations from Title I, Part A are consolidated with local funds into fund 150 for all schools. Title I, Part C (100%) are also consolidated.

Monitoring Intent & Purpose of Title I-A at the school level with Consolidation of Funds.

- Monthly District Leadership Team (DLT) meetings include monitoring of federal and consolidated fund budgets at the district and school level.
- Quarterly District Professional Learning Community (DPLC) meetings include monitoring of interventions, programs, School Wide Plans (SWP) action steps, Consolidated LEA Improvement Plan (CLIP) action steps, and other data relative to student attendance, discipline, and achievement.
- Individual meetings with building principals, phone calls, & emails are also used to follow up on monitoring to address any issues.

Charter Schools

There are no charter schools in Lanier County Schools; however, should a charter school open in Lanier County and qualify for services/resources, planning would occur via discussions with representatives from the charter school. The charter school would be required to submit a plan describing how the funds will be used to support instruction and ensure that all students meet high academic achievement and performance standards. The Federal Programs Director will approve the charter school's plan and maintain the plan and any documentation of the planning process, as well as any documentation needed for audit purposes. Like private school consultations, the charter schools will be notified regarding the federal funds available and the other provisions of ESSA governing Title I schools that impact charter schools as well, such as professional qualifications, choice and supplemental educational services, and unsafe schools.

Special State Charter Schools

The district does not have Special Charter or Commissioned Schools. Procedures will be put in place if schools are added in the future.

Schoolwide Programs

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

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

A Title I school-wide program is a comprehensive reform strategy designed to upgrade the entire educational program in a Title I school with a poverty percentage of 40 percent or more in order to improve the achievement of the lowest-achieving students.

- Any Title I school with 40 percent or more of its students living in poverty, regardless of the grades it serves.

Intra-district Transfer Option/ Public School Choice

Beginning with the 2012-2013 school year, the NCLB Choice was replaced by state law (O.C.G.A. §§20-2-2130-20-2-2131) Intra-district Transfer. The Intra-district Transfer Option allows a parent/ guardian the option to request a transfer from a child's assigned school to a school of the parent's choice within the school zone/district in which the child resides. Intra-district Transfer Option is not available for parents/guardians as there is only one school per grade span in Lanier County.

Target Assistance Programs

The Lanier County School System *does not* have any Target Assistance programs.

Services for Eligible Private School Children

Invitations for private schools to consult in participation in federal programs the following calendar year are sent in the fall, usually October, through the ES4PS App in SLDS. A meeting is held to present information about the programs available to students in private schools. All federal program directors are invited to the meeting, which is complete with an agenda and sign in sheet. Upon receipt of the intent to participate in the ES4PS App in SLDS, a meeting is held to discuss plans and the required components of Federal Program services for private school students. If participating, meetings between the LEA and private school are scheduled every two months to discuss the progress and process of federal programs. Currently Lanier County Schools is not serving any private schools.

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

When a private school determines that the school would like to participate, the district will determine the per pupil allocation for qualified students.

The federal government has issued the following guidelines in determining the eligibility requirements for private schools desiring to participate in federal program services:

E-1. Which private school students are eligible to receive benefits?

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

E-2. Does the law require an LEA to provide equitable services to students and teachers in private for-profit schools?

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

Documentation for Participation

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

Identification for Participants

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

Finance

It is the responsibility of the LEA to process third vendor work as well as materials via a Requisition. No Requests for Reimbursement will be allowed, as all purchases must be approved prior to the purchase. All materials and supplies purchased by the LEA are the property of the LEA. At the time the private school no longer participates, the property will be returned to the LEA. An inventory will be maintained at the LEA. The private school will complete an inventory check twice per year at the request of the LEA.

Complaints

Complaints by the private school are filed in compliance with the state education department ombudsman. Within forty-five (45) calendar days of receipt of the complaint, the State Ombudsman will investigate and send a written finding of fact to the complainant and the LEA.

Evaluation

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

Equipment

The private schools will follow the same procedure as the Lanier County School System.

Timeline for Private Schools

Month	Activity
October-November	● Federal Programs Director sends invitations to request participation to private schools who work with students from Lanier County School District for the following school year. ● Federal Programs Director will gather data and consult with private schools to determine services and possible participants. During the consultation meeting, the five methods for determining eligibility will be discussed and the LEA will decide the appropriate method to use. Calculations will then be made based on the chosen method.
December	● Federal Programs Director will begin to gather data for Eligible Participation Worksheet ● Federal Programs Director reminds private schools that material or purchases must be requisitioned and remains the property of Lanier County Schools. ● The Federal Programs Director sends Form B to participating private schools to ensure services provided in the previous year were equitable. ● The Federal Programs Director conducts the initial private school consultation meeting if any private school indicates an interest in participation on the consultation notification.
August of following year	● Federal Programs Director verifies addresses of students attending private school that wish to participate. ● Begin services.

September- November	• Note: If there is a third-party vendor, see policy for third-party vendor from GaDOE. Sign a letter that states the requirements on both parties to enter into agreement. • Visit sites to determine services are rendered in accordance with federal requirements and complete Federal Programs inventory. • The Federal Programs Director monitors all services regularly. • The Federal Programs Director visits site to determine services are rendered in accordance with federal requirements.
January- May	• Federal Programs Director monitors all services regularly. • Federal Programs Director plans for evaluation of services with a survey at the end of April.
June	• Federal Programs Director completes Equitable Services for Private Schools Form A due for upcoming school year.

Maintenance of Effort (MOE), Comparability, and Assessment Security

All Federal Programs (Except Title I, Part C; Title IV, Part A; 1003(g); and 1003 (a))

Maintenance of Effort

Under Section 8521 of the ESSA, a local educational agency (LEA) may receive funds under a covered program for any fiscal year only if the Georgia Department of Education finds that either the combined fiscal effort per student or the aggregate expenditures of the agency in the state with respect to the provision of free public education by the agency for the preceding fiscal year was not less than 90 percent of the combined fiscal effort or aggregate expenditures for the second preceding fiscal year, subject to the requirements of subsection (b).

(b) REDUCTION IN CASE OF FAILURE TO MEET-1- IN GENERAL-

The state educational agency shall reduce the amount of the allocation of funds under a covered program in any fiscal year in the exact proportion by which a local education agency fails to meet the requirement of subsection

(a) of this section by falling below 90 percent of both the combined fiscal effort per student and aggregate expenditures (using the measure most favorable to the local agency), if such local educational agency has also failed to meet such requirement (as determined using the measure most favorable to the local agency) for 1 or more of the 5 immediately preceding fiscal years.

Covered Programs:

- Title I, Part A;
- Title I, Part, D;
- Title II, Part A;
- Title III, Part A;
- Title V, Part B;
- Title IX, Part A--McKinney-Vento Act.

How does GaDOE test for MOE?

- The GaDOE will test aggregate expenditures of state and local funds to determine if the MOE standard is met. If GaDOE determines that the LEA has met MOE based on aggregate expenditures of state and local funds, no further calculations are required.

- If the LEA does not meet MOE based on aggregate expenditures of state and local funds, the LEA may test combined state and local funds per FTE using a worksheet provided by GaDOE.
- MOE for the Individual with Disabilities Education Act (IDEA) is calculated through other means. Additional information is provided by GaDOE.

The U.S. Department of Education may waive the MOE requirements if it has determined that a waiver would be equitable due to exceptional or uncontrollable circumstances, such as natural disasters or a significant decline in the amount of local funds of the LEA. A worksheet provided by GaDOE may be used for calculating MOE using combined state and local funds per FTE.

Lanier County met MOE for FY18 and FY19. However, should LEA not meet required MOE, source data will be provided to support a request to the GaDOE to seek a waiver.

IDEA Under 34 CFR 300 of the Individuals with Disabilities Act, a local educational agency must budget and expend, for the education of children with disabilities, at least the same amount from one of the following sources: state and local per pupil, local aggregate, or local per pupil.

The GaDOE monitors two standards: MOE Eligibility and MOE Compliance.

MOE Eligibility:

To be eligible to receive IDEA funds, each LEA must complete the MOE Eligibility form along with IDEA budget submission, in which the LEA budgets to expend, at the least the same amount in one of the four sources: state and local aggregate, state and local per pupil, local aggregate, or local per pupil. The eligibility standard must be met in order for IDEA 611 and 619 grants to be approved.

MOE Compliance:

Each LEA must expend, for the education of children with disabilities, at least the same amount from each of the following sources: state and local aggregate, state and local per pupil, local aggregate, or local per pupil. The compliance test will be conducted annually when financial reports have been verified. The MOE compliance results will be located in the Consolidated Application under “Special Education MOE.”

MOE Exceptions and Adjustments:

If an LEA does not meet eligibility or compliance, the LEA may request allowable exceptions or adjustments to be processed.

There are five allowable exceptions by which an LEA may reduce its level of expenditures:

The voluntary departure, by retirement or otherwise, or departure for just cause, of special education personnel or related service personnel; A decrease in the enrollment of children with disabilities;

The termination of the obligation of the agency to provide a program of special education to a particular child with a disability is an exceptionally costly program because the child has left the jurisdiction, aged out of special education, or no longer needs the program of special education.

The termination of costly expenditures for long term purchases such as the acquisition of equipment or the construction of school facilities; this requires prior approval from SEA; and

The assumption of cost by the high cost fund operated by the SEA under §300.704(c).

There is one adjustment that can be made to an LEA's effort:

When an LEA's IDEA Part B 611 allocation increases from the previous year, the LEA may be eligible to reduce the amount required to meet the LEA MOE eligibility and compliance standards by up to 50% of the amount of the increase, if it meets other requirements. This is sometimes called LEA MOE Adjustment or LEA MOE Reduction. The amount of funds expended by an LEA for early intervening services under 34 CFR §300.226 shall count toward the maximum amount of expenditures that the LEA may reduce under 34 CFR §300.205(a).

To reduce effort with exceptions or adjustments, the LEA must complete the Exceptions Requirement form, or the MOE Adjustment form. Both forms are located on the GaDOE website and must be processed and approved with supporting evidence.

Consequence of MOE Failure:

Eligibility Standard: If an LEA fails to budget for the education of children with disabilities, at least as much as the LEA expended for that purpose from the same source, in the most recent year for which information is available, the LEA is not eligible for a federal Part B subgrant in the fiscal year for which the LEA is budgeting. This includes IDEA 611 and 619 grants.

Compliance Standard:

If an LEA fails to maintain its level of expenditures for the education of children with disabilities, the Georgia Department of Education must return to the U.S. Department of Education, using non-Federal funds, an amount equal to the amount by which the LEA failed to maintain its level of expenditures or the amount of the LEA's Part B subgrant, whichever is lower. The Georgia Department of Education will require the LEA to pay this amount using non-federal funds which will be remitted to the U.S. Department of Education. IDEA 611 and 619 grants may not be available to the LEA until the funds have been remitted to the Georgia Department of Education.

MOE Procedures

The following are included in MOE:

- Funds 100, 150, & 599
- Functions 1000, 2100, 2210, 2213, 2220, 2230, 2300, 2400, 2600, & 2700.

The following are not included in MOE:

- Functions 2500, 2800, 2900, 3100, 3200, 3300, 4000, 5000, & 5100
- Objects 700-799 & 594

Lanier County Schools has met Federal MOE requirements.

Comparability of Services

All schools within the Lanier County School System are Schoolwide Title I Schools. There are no overlapping grade spans. Therefore, it is not necessary to complete comparability of services. The Federal Programs Director completes the Comparability report as per the GaDOE timeline.

Assessment Security Procedures

The Lanier County School System conducts the assessment program as required by federal and state law. It is in compliance with the Every Student Succeeds Act (ESSA) and Georgia law relative to student assessment and data reporting. The Lanier County School System interacts with state and federal agencies relative to the assessment program and accountability mandates.

Any employee violating assessment security will be referred to the superintendent for disciplinary action and reported to the Georgia Professional Standards Commission if in violation of the Georgia Educator Code of Ethics.

The Testing Director handles assessment documents and reports including secure test materials, individual student score reports, and school/district data reports in both paper and electronic formats. The Lanier County School System delivers training/guidance related to the assessment program, assessment data, and accountability mandates to all stakeholders. All employees are informed during Assessment Training that they are required to report fraud, waste and abuse concerning Assessment Security.

Testing Procedures

- The System Testing Director attends all mandated Georgia Department of Education trainings and follows all rules, regulations, and guidelines as outlined in the Student Assessment Handbook. The System Testing Director ensures that each assessment within the testing program maintains validity and integrity by following all assessment rules, procedures, and guidelines.
- All School Testing Coordinators (STC) are trained for each assessment cycle by the System Testing Director. This training includes STC roles and responsibilities, test security and ethics, requirements/updates regarding assessments and procedures, etc.
- All building level administrators, certified staff administering assessments, and any proctors used to monitor the testing environment receive training from STC prior to each assessment regarding test security and ethics. Roles and responsibilities regarding the assessment program are also outlined.
- All principals execute requirements as outlined in the Principal's Certification Form found in the Georgia Department of Education Student Assessment Handbook. At the end of each assessment cycle, this form is verified and signed by the principal and filed at the Board of Education.
- After each bi-annual assessment cycle, the superintendent verifies and signs off on the portal verifying that all testing requirements and procedures have been executed properly and in alignment with Georgia Department of Education rules, regulations, and guidelines.

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-wide meeting is 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. These manuals are used 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.

Topics

- Testing Director arranges the delivery of materials to the school coordinators. The Testing Director and School Test Coordinators check the shipment for accuracy of the delivery and make checks of confirmations and notations of inaccuracies. The materials list is initialed and dated with both parties retaining a copy.
- 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. Examiner's 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 and coding within the online platform.
- 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 each individual test booklet / test ticket, the date, the time of sign-in and sign out, and number of test booklets / test tickets received.
- Before testing documents are returned to the Testing Director, the school coordinator carefully accounts for all materials.
- During the document count, the school coordinator checks for complete information (Form Numbers, Labels, Names...) on each answer document as needed.
- Once the materials are re-counted by the Testing Director and the School Testing Coordinator, the materials are packaged for delivery or destruction.
- Principal Certification Sheets are required on all standardized tests. This document must be returned at the time of delivery of the testing materials.

Assessment Security Procedures will be dispersed to all school employees during pre-planning meetings/training.

Distribution of the Assessment Security Procedures will be documented on Beginning of Year forms/training and kept in employees personnel file.

School Reporting Procedures

The Federal Programs Director is responsible for ensuring that the school report card link is posted on the district website.

Internal Controls, Expenditures, Inventory, Drawdowns, Cost Principals - All Programs

The Director of Federal Programs, Director of Special Education, and Director of Finance update internal controls annually. The Director of Federal Programs maintains the Internal Controls procedures. Federal program purchasing follows, at a minimum, all Lanier County School System purchasing procedures.

Written Allowability Procedures

Allowability of Costs / Appropriate Authorizations to Ensure Compliance: Any purchases made with Federal funds must follow the guidelines for allowable costs. The Lanier County School System will follow guidelines as detailed in EDGAR, 2 CFR Part 200. Lanier County School System provides a preference for the purchase of goods and materials produced in the U.S. All federal program purchases will also adhere to any memos, letters, and/or communication regarding allowable/unallowable purchases. The Federal Programs Director will forward any questionable expense to the GaDOE Area Program Specialist for further clarification prior to granting

approval for the expenditure. All federally funded activities must follow the process below to ensure that the Program Director, who has firsthand knowledge of federal and state program implementation requirements, examines each request for allowability (2 CFR §200.302(b)(7), 2 CFR §200.403, 2 CFR §200.432, 2 CFR §200.421, 200.454(a-b), 2 CFR §200.94, 2 CFR §200.453).

As part of ongoing technical assistance, the Federal Programs Director provides training and guidance through emails, meetings, and phone calls with school Principals on allowability principles, including the requirement that all expenditures must be aligned with needs identified in the Schoolwide Plan and the program's purposes for improving the achievement of the school's lowest-performing pupils. Training is documented through sign-in sheets. Principals develop, with their leadership teams, Schoolwide Plans, which are reviewed by the Federal Programs Director as a component of the district's monitoring of its schools. Additionally, once developed, the Federal Programs Director reviews the school-level budgets to ensure all items were included in the CLIP and Schoolwide Plans/TA Plan/or FLP Plan/SSIP if required.

Reasonable and Necessary Use of Funds

Federal Programs/ IDEA expenditure of funds must meet the clause of "reasonable, necessary and allocable." When considering a purchase with federal funds, ask:

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

Allowable and Unallowable Costs

Any purchases made with Federal funds must follow the guidelines for allowable costs. The Lanier County School System Federal Programs will follow guidelines as detailed in EDGAR and the GaDOE guidance. Federal Programs purchases will be aligned with the finding of the annual needs assessment and areas of need identified in the Schoolwide Plans. Federal Programs purchases will also adhere to any memos, letters, and/or communication regarding allowable/unallowable purchases. The Federal Programs Director will direct any questionable expense to the Area Program Specialist for further clarification.

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

The Federal Programs Director/IDEA will prepare a written report of preliminary Federal Programs budgets once this information becomes available from GaDOE. The report is submitted to the superintendent, and the superintendent's leadership team. Upon receipt of budget approval confirmation schools may begin using federal funds. All federal expenditures must be documented in the Comprehensive Needs Assessment which is a part of the Schoolwide/School Improvement Plans.

Supplement Not Supplant

Except for ESSER grants, the ESEA (Title I and other federal programs) expenditures are supplemental to schools' budgets and comply with the supplement not supplant presumptions.

Supplement Not Supplant for Title IA (Sec. 1118)

Sec. 1118(b) (1) In General – Lanier County Schools shall use federal funds under Title IA to supplement the funds that would, in the absence of such federal funds, be made available from state and local sources for the education of students participating in programs assisted under Title I and not to supplant such funds.

Supplement Not Supplant for other programs

The following three presumptions of supplanting are considered for an expenditure. Is the expenditure:

1. Required to be made available under other federal, state, or local laws.
2. Provided with non-federal funds the prior year (For Title III-A, other federal funds included).
3. Providing services to eligible students (Title I-C, Perkins for example) and the same services were provided to ineligible students with non-federal funds.

Resource Allocation Methodology Plan (RAMP)

A Resource Allocation Methodology/Plan (RAMP) is an individualized and a locally developed document that explains how an LEA plans to equitably allocate its state and local funds to operate all the schools in the district. 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 LEA to demonstrate that it is meeting all supplement not supplant regulations in regards to dispensing federal funds. Lanier County is not required to have a RAMP because we only have one primary school, elementary school, one middle school, and one high school.

Purchases made with federal funds must fall within the grant period of performance (27 months). If costs are shared with another federal or state program, the expenditure total must be prorated according to the percentage of use by each program. Likewise, purchases that encompass multiple periods of performance must be prorated accordingly, as are leases and subscriptions that begin before or end after a grant's defined period of performance. Such proration must be clearly labeled on the invoice or Request for Pre-Approval of federal purchases. Purchases will be incurred during the approved budget period; this is the fiscal year of the budget.

Segregation of Duties

Duties are segregated within the fiscal management of the school system. As part of this segregation of duties, multiple signatures are required to process any requests for payment or purchase requisitions.

Payroll entries, stipends, and additional salary from service contracts are processed by the Payroll Clerk based on Personnel Activity Reports, memoranda, and timesheets approved by the Program Director and verified by the employee's immediate supervisor. As with state and local funds, federal stipends are paid in accordance with the district's established procedures with regard to the number of hours worked beyond the contract day or year.

- Purchase Requisition is generated by an employee or administrative assistant under the principal or program manager.
- Purchase Requisitions are approved by the respective principal or program manager.
- Purchase Requisitions are routed to the Administrative Assistant for accounts payable who routes Purchase Requisitions to the program manager then the finance director for approval.
- The Administrative Assistant for accounts payable generates a purchase order and orders items listed in the purchase order.
- Administrative Assistants at the school or board office will check in and verify received items against packing slips and/or invoices.
- Packing slips and/or invoices are forwarded to the Administrative Assistant for accounts payable.
- The Administrative Assistant for accounts payable verifies that the receipt of goods matches the invoice.
- The Administrative Assistant for accounts payable completes an authorization for payment.

- The Payroll, Benefits, Financial Services, and Account Payable Coordinator then processes and sends payment.

Procedures to follow for purchases made with the school system credit card.

If a purchase is to be made from a vendor with the district credit card, the procedures listed below apply (*The procedures for making purchases with the district credit card became effective after February 9, 2022*).

1. A purchase request is completed by an employee or administrative assistant under the principal or program manager to VISA and indicate on the purchase request which vendor the purchase will be made from.
2. Purchase Requisitions are approved by the respective principal and/or program manager.
3. Purchase Requisitions are routed to the Administrative Assistant for accounts payable who routes Purchase Requisitions to the program manager for signature then the finance director for signature.
4. An Administrative Assistant from the central office will have a Credit Card Checkout form completed by the employee who will use the Credit Card. The administrative assistant will then get the finance director to approve the Credit Card Check Out.

Written Procurement Procedures

The district's objective is to purchase the best products, materials, and services at the lowest practical prices within relevant statutes and procedures. It is important to acquire goods and services for the best price through fair and open competition to protect the interest of the local, state, and federal government while still maintaining the desired quality and minimizing exposure to misuse of funds.

Domestic Preferences for Procurements CFR 200.322

As appropriate and to the extent consistent with law, the non-Federal entity should, to the greatest extent practicable under a Federal Award, provide a preference for the purchase, acquisition, or use of goods, products, or materials produced in the United States (including but not limited to iron, aluminum, steel, cement, and other manufactured products). The requirements of this section must be included in all subawards including all contracts and purchase orders for work or products under this award. "Produced in the United States" means, for iron, steel products, that all manufacturing processes, from the initial melting stage through the application of coatings, occurred in the United States. "Manufactured products" means items and construction materials composed in whole or in part of non-ferrous metals such as aluminum; plastics and polymer-based products such as poly-vinyl chloride pipe; aggregates such as concrete; glass, including optical fiber; and lumber.

Acquisition of Federally funded Services or Equipment

1. Software packages, program models, and other instructional support packages will be evaluated by a committee led by the Superintendent or Designee prior to purchase to ascertain that the purchase meets needs identified in the District's/School's needs assessment.
2. All purchases must be preapproved and aligned with the District's CLIP and/or the School's SIP. (Items not budgeted will not be approved)
3. All technology items must meet requirements of the Technology Department's Supervisor.
4. Prior to delivering the items to the schools, the Technology Department will:
 - a. Inventory all items
 - i. Items will be prepared for use (imaged, tested for issues, labeled, etc.)
 - ii. Ensure computer technicians setup the equipment in the designated buildings and rooms as indicated on the inventory.

Full and Open Competition

All procurement transactions paid with federal funds are conducted in a manner providing full and open competition. In an environment of full and open competition, no proposer or bidder has a competitive advantage over another. All potential proposers or bidders must be provided the same information and have the same opportunity to submit a bid or proposal. The district does not engage in the following situations that may restrict full and open competition, including but not limited to:

- placing unreasonable requirements on business in order for them to qualify to do business;
- requiring unnecessary experience and excessive bonding;
- noncompetitive pricing practices between business or between affiliated companies;
- noncompetitive contracts to consultants that are on retainer contracts;
- organizational conflicts of interest;
- specifying a brand name product instead of allowing an equal product to be offered and describing the performance or other relevant requirements of the procurement; and * any arbitrary action in the procurement process.

The district Financial Specialist is responsible for communicating this information and ensuring that no limits to open competition are created.

The district conducts federal procurement in a manner that prohibits imposed state or local geographical preferences in the evaluation of bids or proposals. The district takes necessary affirmative steps to assure that underutilized businesses are used when possible.

Solicitation

All solicitation will incorporate a clear and accurate description of the technical requirements for the materials, products, or service to be procured. Such description will not, in competitive procurements, contain features which unduly restrict competition.

Methods for Procuring with Federal Funds

There are methods that must be used when making purchases with federal funds. In some cases, these federal methods are less restrictive than the state and local requirements, if so then the local or state requirements must be followed. In all cases, the more restrictive requirements must be followed when making purchases with federal funds.

Consultants, Contracts, Purchased Services for Federal Funds

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

- Contracts are generated by the Federal Programs Director. They must also be signed by the Professional Learning Coordinator and Superintendent.
- Duties/services are specifically spelled out for each contract. The contract includes provider information, services to be provided/session description, terms of payment, and payment request to payroll services.
- The contractor/vendor must also submit to a criminal background check if they are working with students. A copy of the vendor's driver's license or other photo identification must be provided with the initial contract. A copy of professional certification is obtained (if applicable).
- If the contracted vendor is serving as a tutor or mentor, Principals must submit a Timesheet to Request for Payment to the Federal Programs Director for review and approval prior to payment being made. Each contract is signed by the following: Contractor/Consultant, Superintendent, Federal Programs Director, and Professional Learning Coordinator.

Contract Administration: The Federal Programs Director provides oversight in ensuring that all contractor/consultant work is complete. Source documentation such as time sheets, sign in sheets, agendas, invoices, or evidence of satisfactory completion of the terms of the contract must be verified and signed by the Program Director prior to the payment for goods or services. All source documentation and completion records of all workshops are kept on file in the Federal Programs office. The Federal Programs Director signs off on all invoices/contracts prior to the issuance of payment for services by the Payroll Department or Accounts Payable office. These contracts and invoices must be maintained and kept in the federal program files.

Contracts should be detailed enough to specify service(s) being purchased/provided, when service must be delivered (date), names entering into contract, contract rate (total fee/per hour), timeframe of contract, method of payment, where services will be provided (location), signatures/ date, and any other relevant information.) 2 CFR 200.318(j)

- Contracts in excess of \$10,000 must address termination stipulations 2 CFR 200.327 Appendix II (B)
- Procedures for dealing with contractors who breach contract terms 2 CFR 200.327 Appendix II

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

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

Informal Procurement Methods

Micro Purchases

Micro Purchases up to \$10,000. When the value of the procurement for property or services under a Federal award does not exceed \$10,000 as defined in 200.100, formal procurement methods are not required. Informal procurement methods may be used to expedite the completion of its transaction and minimize the associated administrative burden and cost. The informal methods used for procurement of property or services at or below the SAT include: a. Procurement by micro-purchases. Procurement by micro-purchase is the acquisition of supplies or services, the aggregate dollar amount of which does not exceed the micro-purchase threshold (§200.200 Micro-purchase) of \$10,000.00.

Lanier County Schools calculates the aggregate dollar amount for each purchase order of supplies or services. To the extent practicable, LCS distributes micro-purchases equitably among qualified suppliers. Micro-purchases may be awarded without soliciting competitive quotations if LCS considers the price to be reasonable based on research, experience, purchase history and other information and documents.

Small Purchases

Procurement by small purchase procedures. Small purchase procedures (§200.320) are those relatively simple and informal procurement methods for securing services, supplies, or other property that do not cost more than the simplified acquisition threshold (§200.88) of \$250,000.00. If small purchase procedures are used, price or rate quotations must be obtained from an adequate number (at least 2) of qualified sources as determined appropriate by LCS.

Formal Procurement Methods

Competitive Sealed Bids

Procurement by competitive sealed bids (formal advertising) for purchases greater than \$250,000.00. Bids are publicly solicited, and a firm fixed price contract (lump sum or unit price) is awarded to the responsible bidder whose bid, conforming with all the material terms and conditions of the invitation for bids, is the lowest in price (§200.329(b)).

- In order for sealed bidding to be feasible, the following conditions should be present:
 - A complete, adequate, and realistic specification or purchase description is available;
 - Two or more responsible bidders are willing and able to compete effectively for the business; and
 - The procurement lends itself to a firm fixed price contract and the selection of the successful bidder can be made principally on the basis of price.
- If sealed bids are used, the following requirements apply:
 - Bids must be solicited from an adequate number of known qualified sources, providing them sufficient response time prior to the date set for opening the bids, for local, and tribal governments, the invitation for bids must be publicly advertised;
 - The invitation for bids, which will include any specifications and pertinent attachments, must define the items or services in order for the bidder to properly respond;
 - All bids will be opened at the time and place prescribed in the invitation for bids, and for local and tribal governments, the bids must be opened publicly;
 - A firm fixed price contract award will be made in writing to the lowest responsive and responsible bidder. Where specified in bidding documents, factors such as discounts, transportation cost, and life cycle costs must be considered in determining which bid is lowest. Payment discounts will only be used to determine the low bid when prior experience indicates that such discounts are usually taken advantage of; and
 - Any or all bids may be rejected if there is a sound documented reason.

Procurement by competitive proposals (§200.320(c)).

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

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

Procurement by noncompetitive proposals (Sole Sourcing).

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

- The acquisition of property or services, the aggregate dollar amount of which does not exceed the micro-purchase threshold;
- The item is available only from a single source;
- The public exigency or emergency for the requirement will not permit a delay resulting from publicizing competitive solicitation;
- The federal awarding agency or pass-through entity expressly authorizes a non-competitive proposal in response to a written request from the non-federal entity; or
- After solicitation of a number of sources, competition is determined inadequate. Domestic Preferences for Procurements (CFR 200.322).

Cost/Price Analysis for Federal Procurements in Excess of \$250,000

The district will make independent estimates of the goods and services being procured before receiving bids or proposals to get an estimate of how the goods and services are valued in the current market. To accomplish this, after bids and proposals are received, but before awarding a contract, the district will conduct either a price analysis or cost analysis, depending on the type of contract, in connection with every procurement with federal funds in excess of \$250,000.

Cost Analysis Non-competitive Contracts: The cost analysis involves a review of proposed costs by expense category, which includes an analysis of whether the costs are allowable, allocable, reasonable, and necessary to carry out the contracted services. The cost analysis must be used for all non-competitive contracts, including sole source. When performing a cost analysis, the Financial Specialist negotiates a profit as a separate element of the price. To establish a fair and reasonable profit, consideration is given to the complexity of the work to be performed, the risk borne by the contractor, the contractor's investment, the amount of subcontracting, the quality of its record of past performance, and industry profit rates in the surrounding geographical area for similar work.

Price Analysis Competitive Contracts: The price analysis determines if the lump sum price is fair and reasonable based on current market value for comparable products or services. In general, the price analysis can only be used with competitive contracts and is usually used with fixed price contracts. Total cost must be reasonable in comparison to current market value for comparable products and services.

Superintendent's Attestation

Annually, on the final fiscal report or voucher requesting payment, the Superintendent will submit the required certification attesting that cash receipts, expenditures, and disbursements are compliant with the Elementary and Secondary Education Act (2 CFR §200.415).

Written Conflict of Interest Policy

Employees of the Lanier 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 the Lanier County School System may neither solicit nor accept gratuities, favors, or anything of monetary value from contractors or parties to sub-contracts.

Violation of these standards will result in reporting of said personnel to the Superintendent of Schools and, if appropriate, local authorities. If the Superintendent is involved in the conflict of interest, the report will be made to the Chairman of the Board of Education. Any misconduct could result in suspension, loss of employment, and any other consequences that are applicable by law. All violations of federal criminal law involving fraud, bribery, or gratuity violations potentially affecting the federal award will be reported to the Lanier County Superintendent as well as the Georgia Department of Education (2 CFR §200.113).

The district requires vendors to disclose potential conflicts of interest with current or former Lanier County Board of Education members and employees when signing contracts (2 CFR §200.318(c)). Additionally, the district reviews the Georgia Department of Audits list of suspended and debarred suppliers as part of the Internal Controls process.

Nominal items have a value of \$200 or less. These items include non-monetary items that may include: tickets, balloons, trinkets, coffee cups, shirts, jackets, gift baskets, gift cards or other similar items. Nominal items of \$200 or less are not considered conflict of interest.

Principals and Program Directors will provide staff training annually at the Beginning of the Year concurrent with training on the Federal Programs Written Procedures. The Conflict of Interest Policy is included in the Federal Programs Written Procedures Manual and will be disseminated to all employees at the beginning of the year electronically. Employee receipt and training certification will be documented on Beginning of Year Employee acknowledgements.

Written Personal Compensation Policies (Time and Effort to include salaries, substitutes, and stipends)

Time and Effort records are maintained for all employees whose salaries or other compensation are paid in whole or in part with federal funds not to exceed 100%.

Semi-Annual or Periodic Certifications are required for staff working on a single cost objective paid from federal funds and account for the total activity. These are signed after the fact by the supervisor. These certifications will be completed on group forms. The applicable program director will be responsible for collecting the forms. This process takes place at the end of each semester (Dec/Jan and again May/June). The forms are signed and kept on file in the Federal Programs office.

Personnel Activity Reports (PARS) are required for staff paid from multiple cost objectives and just account for the total activity. These records are signed after the fact by the employee and supervisor. These reports are prepared monthly and submitted to the applicable program director monthly. The applicable program director is responsible for collecting the forms.

Lanier County Schools complies with EDGAR regulations as it relates to split-funded procedures. Any employee being paid with federal funds or a combination of funds will be required to complete monthly time sheets to verify the appropriate work under federal program regulations.

Split-funded personnel are required to maintain personnel activity reports also known as a time log delineating the specific Title I and non-Title I duties. The format used is the time log found on the GaDOE website. Forms are signed monthly by the Federal Programs Director. The time log (PAR) is completed after the end of each

month and submitted to the Federal Programs Director for review and signature. Supporting documentation (source documentation) is kept by the person owning the time log. This source documentation includes calendar entries, notes, etc. Signed forms are maintained in the Federal Programs office.

Supporting documentation is collected as needed to verify time and effort. Discrepancies will be reconciled before the end of the school year. The Program Director will check time logs and collaborate with the employee and supervisor if appropriate to adjust work schedules to ensure that the final amount charged to the Federal Award is accurate, allowable and properly allocated.

Written Stipend Policy

Stipend pay is for staff members (certified personnel and paraprofessionals) participating in professional development or other learning opportunities outside his or her regular scheduled work hours or non-contracted work days (See Georgia Board Rule 160-3-3.04). The rate for paraprofessionals and certified staff is their individual hourly or daily with a daily maximum amount of \$300 per day.

All compensation from federal funds must be for work on an award for performance for allowable activities and must be reasonable & necessary to the federal program. Stipends may be awarded only if the following conditions exist:

- There is evidence that the knowledge, skills, practices, and dispositions gained from the professional learning activity are aligned to an approved individual plan, or a school or LEA initiative and/or product, and/or specific goals; and
- There is evidence that the knowledge, skills, practices, and dispositions developed through participation in, or facilitation of professional learning have been implemented/ demonstrated in the classroom/work setting; and
- Participation occurs beyond regular contract hours, days, or school year.
- State and federal funds designated for professional learning shall not be used to pay stipends to school board members or to school council members who are not employees of the LEA.

Written Travel Policy

All travel reimbursements are made according to Georgia Statewide Travel policy set by the State Accounting Office. Travel costs must be reasonable and consistent with written travel policy/or follow GSA 48 CFR 31.205-46a.

All requests for transportation, lodging, subsistence, and related items will be approved at the discretion of the Program Director with final approval from the Superintendent. Prior approval is required for all travel reimbursements.

Prior to the professional development training

The school or individual will submit a request for Professional Learning with a copy of the proposed agenda or purpose of the training to the appropriate program director, including Director of Federal Programs, Director of Special Education, or Assistant Superintendent of Curriculum and Instruction, if possible, at least 2 weeks prior to the training. The agenda or purpose must include the start and end time as well as the facilitator. The school will be notified by the appropriate director if the PD has been approved, requires modification or is not allowable. Prior approval by the appropriate Director is required or payment will not be rendered.

After the professional development training

Upon completion of the PD, the school is required to submit the agenda, sign in sheet, and evaluation forms from the Principal verifying completion of the training. The sign in sheet must include the participant's name,

title, signature, time-in, and time-out. Upon receipt of completion documentation, the forms will be submitted by the appropriate director and to the Payroll Department for payment processing.

Upon return, the employee must submit the Travel Expense Form and all required documentation such as dated hotel receipts and conference agendas. The employee's immediate supervisor, the Program Director, the Assistant Superintendent, and the Superintendent must approve the request for reimbursement for any travel-related expenses, which must not exceed the Travel and Leave Request total without written explanation from the employee and pre-authorization of the Program Director. Once approved, the Accounts Payable Clerk processes a check for reimbursement to the employee upon final review by the Finance Director. Travel charges are only allowed if consistent with Lanier County Schools written reimbursement policies. Travel reimbursement is allowable for transportation, lodging, subsistence, and related items expenses incurred by employees who are on travel status by an official business of the non-federal entity.

Suspension and Debarment

The Director of Finance ensures that no vendors from whom the Lanier County School System purchases goods and services are listed on the website sam.gov as being suspended, debarred or otherwise excluded from or ineligible for participation in Federal assistance programs or activities. When a purchase request for \$25,000 or more comes to the Director of Finance for approval, The Director of Finance checks the SAM for debarment and prints a time stamped copy of the screen from SAM verifying the vendor. A copy of the verification will be kept on file in the Finance Director's office. When applicable, the Finance Director immediately notifies the person who originated the purchase order so another vendor can be selected (2 CFR §180.25(a) and 2 CFR §200.213). LCS may continue to use the vendor if LCS was using the vendor before they were excluded.

2 CFR 180.220 Procurement contracts included as covered transactions include any contract or subcontract expected to equal or exceed \$25,000 must be checked against the System for Award Management (SAM) for suspension or debarment.

Inventory

Equipment and Real Property Equipment Inventory

The LEA maintains a federal inventory of purchased items (equipment) with a single, unit cost of \$5000 or greater having a useful life of more than one year. A physical inventory will be conducted once every two years. The LEA will safeguard against loss, damage, or theft of equipment by using an internal asset management system. This includes items purchased for the central office and the district's public schools. All items are marked with a label which has the fiscal year and program code. The label is placed on the equipment in a location easy to see. The inventory is reviewed annually by the system technology director and the federal programs director.

Acquisition

A. System & School Purchases (Prior Approval is required.)

1. Purchase must be tied directly to the current LEA Plan (Schoolwide, Targeted Assistance, Equity Action Plan, School Improvement Plan) & List of Prioritized Needs
2. Purchase/Check Requisition Completed
 - a. Signed by Authorized Administrator
 - b. Clear Description
 - c. Signed Approval by Program Director (*Allowable Expense & Funds*)
 - d. Signed Approval by /Finance Director
3. Purchase Order/Check order completed by BOE
 - a. Signed by Superintendent

4. Copy to Program Director
 5. Copy to School
 6. Approval to Order
- B. Follow Purchasing Policy

Inventory Management

Federal programs inventory is maintained on a spreadsheet or database that identifies the item, serial/identification number, description, source of funding, Federal Award Identification Number (FAIN), vendor, date of purchase, cost, location, and condition. Equipment purchased with federal funds is permanently marked with the appropriate program and the fiscal year in which the equipment was purchased.

Physical inventories are conducted once every two years by the principal, Technology Director, & Federal Programs Director. Inventory reports will be reconciled with property records within one month.

All inventory items purchased are delivered to the Lanier County Board Office. Upon arrival, the administrative assistant accepts the item and checks the funding source. An email is sent to the Program Director and Technology Director for items. Items are properly labeled and inventoried according to fund source. The Program Director inventories and labels non-technology equipment and items. The Technology Director inventories and labels technology items. Items are inventoried based on if they are mobile or non-mobile. Items are distributed by IT and Program Director to the appropriate school (public or private). Items will be properly inventoried and labeled before use.

Mobile items are inventoried through each school's media center database and/or inventoried in the Inventory System Database. Mobile items are housed in the media center and available using the media centers check-out system. Mobile items may include tablets, iPads, computer carts, chrome books, and laptops. Mobile items are housed in the media center to safeguard against loss, damage, or theft of equipment.

Non-mobile items are also inventoried using the media center and entered into the Inventory DataBase. Non-mobile items may include items such as bulletin boards, Clear Touch TV's, and Non-Mobile Computer Lab.

The bar code placed on items will include the following information:

- Description
- Vendor
- Date
- Site
- "Program Name" Property
- Bar Code

The Inventory Database or Spreadsheet will include the following information:

- Fiscal Year (FY)
- Date Added to Inventory
- Vendor
- Item No.
- Item Description
- Date Purchased
- Price
- PO No.
- Title
- Funding Source Percent

- FAIN
- System Serial Number
- Location
- Room/Office
- Use (Instruction, Professional Learning, Parent Involvement, Recruitment/Retention, Other Detail)
- Condition (good, fair, poor, disposed with form(s) attached)
- Disposition & Date of Disposal (include sale price if applicable)

Monitoring

- A. Principals and IT Director Inventory every two years
- B. Send reports to Programs Director

Equipment Use

Each principal shall provide in-service to school staff annually using Written Procedures.

Targeted Assistance schools should use Title I equipment for TA students only. Lanier County does not have Targeted Assistance Schools.

Title I Director will communicate with Private Schools to ensure Title I Equipment Use Procedures are followed.

Offsite use of Title I equipment is allowed only for teachers and staff employed by the school system. If equipment is taken off site for the purpose of parent involvement meetings or to plan instruction, all equipment must be returned to the location listed on the inventory by the beginning of the next school day.

Maintenance

Principals will monitor equipment and report technology maintenance needs to the Technology Director. The Technology Director will determine if technology items are repairable and coordinate its repair or disposition if beyond repair.

Other maintenance needs will be reported to the Federal Programs Director.

Equipment Sale

Should LEA receive authorization or be required to sell equipment, proper sales procedures will be established to ensure the highest possible return.

Lease of Equipment

The school system does not lease equipment using federal or ESSER funds.

Equipment Disposition Procedure

When computer equipment is no longer operational, it will be recycled or disposed of according to the following:

- A. Follow Policy DO: School Properties Disposal Procedures
- B. Complete Disposal Sheet & Obtain Program Director Approval Signature Coded on Inventory
- C. Copy Sent to Program Coordinator
- D. For original or replacement equipment purchased with a Federal award that is no longer needed for original project or program or for other activities currently or previously supported by a Federal awarding agency

LEA will request disposition instructions from the Federal awarding agency if required by the terms and conditions of Federal award.

- E. Disposition of equipment will be made in accordance with Federal awarding agency disposition instructions:
- a. Items of equipment with a current per unit fair market value of \$5,000 or less may be retained, sold, or otherwise disposed of with no further obligation to the Federal awarding agency.
 - b. Federally owned and exempt property or if Federal award agency fails to provide disposition instructions within 120 days, items with equipment with a current per-unit fair-market value in excess of \$5,000 may be retained by the LEA or sold. The Federal awarding agency is entitled to an amount calculated by multiplying the current market value or proceeds from the sale by the Federal awarding agency's percentage of participation in the cost of the original purchase.
 - c. The LEA may transfer the title to the property to the Federal Government or to an eligible third party provided that, in such cases, the LEA must be entitled to compensation for its attributable percentage of the current fair market value of the property.

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 Federal Programs Director. Inventory records will need to be corrected, printed, and maintained. At the designated time, the outdated technology is brought to a predetermined location to be recycled. The Technology Department works with a company to dispose of and recycle all equipment. At that time, the company determines whatever is most appropriate for the equipment. The company is required to present the school district with a certificate stating that all data has been removed from all technology devices. Currently, the school system does not receive any money for the recycling or disposal of equipment.

In the event, Federal Programs equipment or technology is stolen the following procedure will be followed:

- A. File an incident report with the SRO
- B. Attach the incident report to the Technology Disposal Form and send it to the Federal Program Director's office.
- C. Make corrections to the Federal Programs inventory.
- D. Send the updated inventory to the Federal Programs office. The principal must sign and date the inventory spreadsheet.

Employees will receive a copy of the Federal Programs Handbook including written procedures for Inventory at the Beginning of the Year or upon hire for employees hired after the start of the year.

Cash Management and Drawdowns

Drawdowns

The Lanier County School System requests drawdowns of federal funds consistent with the department's DE0147, and the requests are supported by accounting records of outlays (expenditures) on actual rather than anticipated expenditures; thus, a reimbursement method is applied and advance payments are not requested. The steps below are used for drawdowns. Drawdowns will occur at least quarterly after original budget approval.

1. The Finance Director verifies financial reports (Expenditures & Journal Entries).
2. The Finance Director completes a DE0147 Drawdown request for the verified amount of funds.
3. The Federal Programs Director verifies the budget, financial reports, and the DE0147. The Federal Programs Director will meet with the Finance Director to correct any errors or discrepancies before approval.
4. The Federal Programs Director approves the request.

5. The Finance Director submits the drawdown request.

Federal Programs Director will maintain records for drawdowns with signature and dates including final DE0147 and corresponding financial reports.

The Finance Director will meet with the Federal Programs Director to monitor cash management, including reconciliations (comparing expenditures with budget amounts for each Federal award). See the Financial Monitoring section for details of the monitoring schedule.

The Finance Director reconciles the bank statements monthly. The Finance Director performs periodic reviews of the general ledger. All reporting documentation is kept in Finance Services. It can be reviewed at any time.

Drawdown of Transferred Funds

Expenditure reports are used to prepare drawdowns. To ensure that 100% of transfer funds are expended, transfer funds are drawn down prior to any draw down of Title I Part A funds. Transfer funds are typically expended during the first quarter.

Pre-Approval of Purchases

The Lanier County School System has procedures in place for purchases from federal funds to maintain internal controls and to avoid fraud, waste and abuse, and corruption. All purchases must be pre-approved prior to an order being placed.

Upon receipt of budget approval confirmation from the program director, the school may begin utilization of federal funds. All Federal Programs expenditures must be aligned with the CLIP or Program plans required by the grant. All Title I expenditures must be designed to have an impact on improving student achievement and detailed in approved consolidated application.

Upon arrival of federal funds materials will be secured by the school or district designated Administrative Assistant and checked in a timely manner.

The program and IT director are notified for inventory. Once inventoried, merchandise delivered by maintenance personnel to appropriate school principals for distribution.

Appropriate documentation sent to Accounts Payable for payment. Prior to payment, Accounts Payable submits for approval from the director in charge of grant money spent. Once the Director approves, documentation is sent back to Accounts Payable and processed for payment.

Accounts Payable closes all P.O.'s for materials not ordered or received yearly. P.O.'s processed for payment are closed when completed.

Lanier County will receive prior approval from GaDOE Federal Programs Department to make capital expenditures with federal funds for any purchase of \$5000 or more. Documentation from the Department will be maintained on file, should LEA seek and receive approval in application. The Superintendent may authorize purchases within the budget of up to \$10,000 per item without Board approval. (See board policy DJEA).

Procurement Records

Records for procurements made using Formal Procurement Procedures or Non-Competitive proposals will include rationale for method of procurement, selection of contract type, contractor selection or rejection and the basis for the contract price along with the voucher package and subsequent periodic contract payment requests.

Expenditure of Funds

Spending will follow the pre-approval process throughout the spending period. The Director of Finance will generate monthly reports from the Finance Department. Monthly reports will be analyzed for expenditures against budgeted funds. The Federal Programs Director will compare detailed monthly expenditure reports to the consolidated application monthly with the Director of Finance to ensure that expenditures are in accordance with the approved consolidated application.

Payment

Lanier County Schools has weekly check runs for accounts payable. Any invoices received are processed for payment weekly.

Subrecipients

Lanier County Schools does not use subrecipients.

Payroll

After the September payroll has been posted, the Director of Federal Programs has a report pulled that shows the name of the personnel paid with Title funds. This report should match the Title I or Title II personnel names submitted on the budget sheet by the Principal. If the names do not match, an investigation occurs and the matter is resolved, if necessary, through journal entries. The payroll report is pulled and checked several times throughout the year. At the beginning of the year, Title I teachers are asked if they will complete a degree upgrade during the year. Budgets are built around the anticipated upgrade. The Director of Federal Programs ensures that the number of staff on payroll is consistent with the approved Title I and Title II budget.

Reporting Procedures

The Financial Director completes and reconciles completion reports for federal grants by September 30. Copies of completion reports for the previous fiscal year will be kept on file in the Finance Department. EOY documentation includes: completion, trial balance, and receivables reports. Accounting records to support the results of outlays (expenditures indicated in the completion report will be kept on file in the Federal Programs office and Finance Department. Copies of expenditure (cumulative through) reports for the respective quarter for total expenditures reported to GaDOE will be kept on file in the Federal Programs office and Finance Department. The Federal Programs Director will run a budget summary and detailed expenditure reports for all federal program funds. The Federal Programs Director discusses budget summary reports with each administrator/school at monthly DLT, Principals' meetings and ongoing communication/feedback through phone calls, electronic feedback, and emails.

Capital Expense Funds

Prior approval from GaDOE will be received before capital expenditures from federal funds.

Individual Federal Programs

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

The Purpose of Title I, Part A is to provide supplemental funds for districts to improve the academic achievement of students who are economically and educationally disadvantaged.

Within District Allocation Procedures

Attendance Area Determination

The Lanier County School System only has one school per grade span: PK-2, 3-5, 6-8, and 9-12. Therefore, attendance area determination is not needed to establish rank order.

The Lanier County School System serves Title I Schools in rank order of the percentage of poverty within the school as calculated on the Eligible Attendance Area Worksheet. The Lanier County School System utilizes grade span grouping. Schools are ranked in order from highest to lowest percentage of poverty.

Eligible Attendance Areas: The GaDOE Eligible Attendance Area Worksheet is used to calculate the previous year's enrollment (from the October FTE Count), pre-kindergarten information, and free or reduced lunch/CEP status. Attendance area determinations are calculated using the previous year's October FTE count of children eligible for free/reduced price meals or CEP direct certification numbers under the Richard B. Russell National School Lunch Act and the October FTE enrollment report. These numbers are placed in the attendance area determination worksheet provided by GaDOE and are then rank ordered from highest to lowest percentage free/reduced lunches/CEP counts. Pre-K counts are automatically deducted in the document. Schools are grade span grouped and rank ordered for per pupil allocation calculations, which are highest to lowest per the percentage of poverty or in a rank such that a school ranked at a higher poverty receives no less per pupil allocation than the lower ranked per pupil allocation. School-wide schools, those currently at 40% or that have been a schoolwide program and remain above the 35% rate, are served. Currently, no schools are being served as targeted assisted programs. The Lanier County School System is identified as a Community Eligibility Provision (CEP) district including all schools.

Carryover

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

Monthly budget sheets are monitored regularly throughout the year and calculations are made from these near the end of the school year to determine that no more than 15% will be carried into the following year. The Federal Programs Director tracks the spending of each program/school through the year via budget sheets. At the end of the school year, carryover information is updated and reviewed. Parent involvement and professional development for identified schools designated as needs improvement are taken into consideration.

To determine the amount of carryover for parental involvement, the Federal Programs Director first obtains a copy of the previous year's set aside page of the Consolidated Application. The Federal Programs Director then obtains an expenditure report/completion report form the Finance Department to verify expenditures for parental involvement. The required amount and the expended amount are compared. If less funds have been expended than is required, that amount is the carryover amount. If equal or more funds have been spent, then no carryover is required.

Reservation of Funds

Parent & Family Engagement: Lanier County Schools sets aside 1% of the initial Title I Part A allocation for Parent & Family Engagement. Principals have the option of expending the 1% in Parent Engagement funds or submitting them back to the system level. Principals typically decide to use those funds at the school level for school coordinators and parent and family engagement activities and events. Title I parents participate in the discussion regarding this requirement during the system Title I meeting.

Professional Development: Georgia's Flexibility Waiver no longer requires 10% set aside for professional learning. To promote continuous school improvement, Lanier County Schools will continue to pursue professional development to strengthen best practices in all classrooms. Research based professional learning activities will be prescribed through an evidenced based design and will address the need areas identified by the district and school improvement goals.

Homeless Children and Youth: Title I schools are required to set aside funds within their budgets to meet the needs of homeless children and youth. The Federal Programs Director with assistance of the Homeless Liaison annually determines the amount of funds needed to adequately meet the needs of homeless students. The Homeless Liaison trains school personnel including: counselors, PFE Coordinator, as well as clerks, teachers, and principals to identify children in homeless situations. A home survey is also used to identify homeless students. The Homeless Liaison is consulted if any staff member suspects that a student qualifies for homeless services. The Homeless Liaison or designee then investigates the situation and makes the ultimate determination on whether students qualify. When a student does qualify, notes related to the situation are maintained, and a memo/email is sent to the Student Information Coordinator and the Director of Nutrition. Homeless set aside funds are used to purchase needed supplies and for tutoring services for identified homeless students on an as needed basis.

Neglected and Delinquent Children: The Annual Survey of Local Institutions for Neglected and Delinquent Children is completed each year and is based on the number of children residing at home for 30 consecutive days with at least one being in October. Currently, there are no Neglected and Delinquent Institutions in Lanier County.

Private Schools: Lanier County School System currently has no Private Schools that have chosen to participate in federal programs. If Lanier County Schools were to ever have any Private Schools that choose to participate, all Title I and other federal regulations for private school participation and equitable services will be followed. The private school worksheet would be completed and attached to the Consolidated Application to ensure that all reservations related to parental involvement, instructional lead teachers, professional learning, and paraprofessionals have been reserved.

The district uses the information provided by the GaDOE to determine reservations for parental involvement, Private Schools, indirect cost, and Neglected/Delinquent.

Monitoring of Neglected and Delinquent Facilities

The Federal Programs Director completes and submits an annual survey to the GaDOE indicating any students enrolled in residential facilities for neglected or delinquent children located in the LEA school attendance area. There are currently NO residential facilities for neglected and/or delinquent children in the Lanier County School System.

Monitoring of Private Schools

Private schools are monitored by the Federal Programs Director. Invitations for private schools to consult and participate in federal programs the following academic year are sent in the fall (October/November), via ES4PS Application in SLDS. A meeting is held to present information about the programs available to students in private schools. Currently, Lanier County Schools is not serving any private schools.

Technical Assistance

Technical Assistance and Professional Learning are provided based on the needs expressed in the Comprehensive Needs Assessments and are used as a preventive measure to ensure that all staff have a clear understanding of all expectations for every facet of Federal Programs. The Federal Programs Director, along

with district level staff, and outside consultants, provide on-going training as a means of ensuring all staff meet compliance.

Academic Achievement Awards Program

To reward successful schools and school districts for significant progress in improving student achievement and/or significant progress in closing the achievement gap, the Georgia Department of Education honors K-12 Title I schools and school districts. The Title I Achievement Awards program recognizes and honors three categories of schools: Title I Distinguished Schools; Title I Reward Schools; and National Title I Distinguished Schools.

Title I Distinguished Schools

A Title I Distinguished School is a Title I school among the top 5% Schoolwide and top 5% Targeted Assisted Title I schools in the state that have the highest absolute performance for the all-students group based on the current statewide assessment. A school may not be classified as a Title I Reward School if it is also identified as a Targeted School of Improvement (TSI), a Comprehensive School of Improvement (CSI), or a Promise/Turn-Around School.

Data Determination for List of Title I Distinguished Schools

- Count the number of Title I schools (SWP and TA separately) in the state for the previous school year.
- Multiply the number of Title I schools (SWP and TA separately) in the state for the previous school year by 5-percent.
- The resulting value is the number of Title I schools (SWP and TA separately) in the state that are to be identified as Distinguished Schools.
- Rank the Title I schools (SWP and TA separately) based on the single assessment score results from highest achievement to lowest achievement.
- Remove schools from the list of schools that have been identified as CSI, TSI, or Promise/Turnaround Schools.
- Identify the top 5-percent of Title I schools in any given fiscal year as Title I Distinguished Schools.

Title I Reward Schools

A Title I Reward School is a Title I school among the 5% of Title I schools in the state that is making the most progress in improving the performance of the all-students group over the most recent two years on the statewide assessments. A school may not be classified as a Title I Reward School if it is also identified as a Targeted School of Improvement (TSI), A Comprehensive School of Improvement (CSI), or a Promise/Turn-Around School.

Data Determination for List of Title I Reward Schools (Beginning 2020)

- Count the number of Title I schools in the state for the previous school year.
- Multiply the number of Title I schools in the state for the previous school year by 5-percent.
- The resulting value is the number of Title I schools in the state that are to be identified as Title I Reward Schools.
- At the school level, aggregate the all-student and subgroup achievement results based on assessment data from the previous two-years for all End-of-Course Tests (EOCTs), all Georgia Milestones Assessments, and Georgia Alternate Assessments (GAAs). For a group (all-students as well as the remaining nine traditional subgroups) to be considered in the calculations, the group must meet the minimum *n* size of 15, where each member of the group has a valid assessment for each content area.
- Rank the schools based on the greatest amount of progress.
- Remove schools from the list of schools that have been identified as CSI, TSI, or Promise/Turnaround Schools.

- Identify the top 5-percent of Title I schools in any given fiscal year as Title I Reward Schools.

Title I National Distinguished Schools

A Title I National Distinguished School is one of two schools selected from the SWP Title I Schools identified Title I Distinguished Schools described above. All the SWP Title I Distinguished Schools will be invited to make application for the National recognition.

Data Determination for Georgia's Two National Title I Distinguished Schools (Beginning 2020)

- Invite all SWP Title I Schools identified as Distinguished (State level) Schools to make an application for National Distinguished recognition.
- Applications received will be numbered and redacted to provide complete anonymity to all readers/scorers.
- Received applications will be read blindly by a minimum of four readers and the average of those four scores for initiative numbers 1 and 2 will be added to the other qualifying criteria (CCRPI score for the current year, growth from previous year CCRPI and most recent CCRPI score, and poverty percentage of the school's population). Scores received for initiative number 3 will be used as a tie-breaker, if the need arises.
- The top two resulting schools will be named as Georgia's representatives for the National Distinguished School Award sponsored by the National Association of ESSA State Program Administrators (NAESPA)

Recognition

Georgia will recognize its Title I Distinguished and Reward schools each year. The Title I Distinguished schools will receive a reward certificate, a recognition flag, and listing on the Title I Website. The two schools recognized as Georgia's National Distinguished Schools will receive \$20,000 from state Title I funds to facilitate travel to the NAESPA National Conference to participate in the National Distinguished School Recognition Ceremony. The two nationally identified schools may also receive recognition paraphernalia (flags, certificates, etc.) from the NAESPA organization. The Reward schools will receive a reward certificate and listing on the Title I Website.

Services for Homeless Children and Youth

Lanier County Schools homeless liaison works very closely with school guidance counselors to assure students receive needed services. The district submits, through the Consolidated Application's Coordination Tab and Student Record, information about the number of homeless children and reports educational and related support needs through an annual survey in the GaDOE portal.

Identification

Homeless children and youth are defined as individuals who lack a fixed, regular, and adequate nighttime residence. The term includes children and youth who are: (1) sharing the housing of other persons due to loss of housing, economic hardship, or a similar reason; (2) living in motels, hotels, trailer parks, or camping grounds due to lack of alternative adequate accommodations; (3) living in emergency or transitional shelters; (4) abandoned in hospitals; (5) living in a primary nighttime residence that is a public or private place not designed for or ordinarily used as a regular sleeping accommodation for human beings; (6) living in cars, parks, public spaces, abandoned buildings, substandard housing, bus stations, train stations, or similar settings; (7) and migratory children who qualify as homeless because they are living in circumstances described above.

School Selection

The Lanier County School System only has one school per grade span: Pre-K-2, 3-5, 6-8, and 9-12. Therefore, school selection within the district is not an issue.

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. The school shall immediately enroll the homeless child or youth, even if the child or youth is unable to produce records normally required for enrollment, such as previous academic records, medical records, proof of residency, or other documentation. Any identification of a “homeless” student/family will be immediately submitted to the Homeless Liaison for further investigation.

Transportation

The LEA must provide students experiencing homelessness with transportation services comparable to those provided to other students to and from their school of origin, at a parents or guardian’s request. The “School of Origin” is defined as the school that the child or youth attended when permanently housed or the school in which the child or youth attended when permanently housed or the school in which the child or youth was last enrolled. For unaccompanied youth, LEAs must provide transportation to and from the school of origin at the LEA homeless liaison’s request. If the student’s temporary residence and the school of origin are in the same LEA, that LEA must provide or arrange transportation. If the student is living outside the school of the origin, the LEA where the student is living and the school of origin’s LEA must determine how to divide the responsibility for cost of providing transportation, or they must share the responsibility and cost equally. If an LEA wishes to send a homeless child to a school other than the school of origin or a school requested by the parent or guardian, the LEA must provide a written explanation of its decision to the parent or guardian, together with a statement regarding the right to appeal the placement decision.

Program Procedures

Our schools work with the Homeless Liaison to identify students and families in need. Annually during pre-planning, staff members participate in professional learning on Homeless (definitions, eligibility process, and other data). Staff members (School Social Worker, Teachers, Nurses, Counselors, Administration) use the following to help identify students and families in need.

- Enrollment Process
- Student Interviews
- Teacher Input
- Home Visits
- DFACS Information
- Other Community/Agencies Information & Reports
- Surveys

Disputes (Complaint Procedures)

If a dispute arises over any issue covered in this policy, the homeless child or youth shall be immediately admitted to the school in which enrollment is sought, pending final resolution of the dispute. The student shall also have the rights of a student in transition to all appropriate educational services, transportation, free meals, and Title I services while the dispute is pending.

The school where the dispute arises shall provide the parent or unaccompanied youth with a written explanation of its decision and the right to appeal and shall immediately refer the parent or youth to the liaison. The liaison shall ensure that the student is enrolled in the school of his or her choice and receiving other services to which he or she is entitled and shall resolve the dispute as expeditiously as possible. The parent or unaccompanied youth shall be given every opportunity to participate meaningfully in the resolution of the dispute. The liaison shall keep records of all disputes in order to determine whether particular issues or schools are repeatedly delaying or denying the enrollment of homeless children and youth.

The parent, unaccompanied youth, or school district may appeal the liaison's decision as provided in the state's dispute resolution process.

Program Training and Information Dissemination

The Homeless Liaison or designee annually conducts training and sensitivity/awareness activities each fall to heighten the awareness to all faculty and staff across the district. The Homeless Liaison will lead and coordinate compliance with this policy and will receive training from the GaDOE annually. Training is provided and documented through webinars, training sign-in sheets, PowerPoint presentations, and agendas. The Homeless Liaison or designee distributes posters and brochures in the counselor's office, social worker's office, and the Parent Involvement Resource Room. Posters and brochures are also distributed to the community at various locations including but not limited to the following: Department of Family and Children's Services, Community Centers, Local Churches, Health Department, Fire Department, Hospital, Local Law Enforcement, and Local Doctor Offices.

The Transportation Department holds annual training for all system drivers each fall on a number of topics. Training on the transportation of homeless students is an agenda item each year during this training. The Homeless Liaison or designee uses a PowerPoint presentation to inform drivers on how they can assist with the identification of homeless students, as well as other issues related to the transportation of homeless students. Meeting documentation includes the PowerPoint presentation, agenda, and sign-in sheets.

Services for Children in Foster Care

The Every Student Succeeds Act (ESSA), which reauthorizes the Elementary and Secondary Education Act of 1965 (ESEA) and No Child Left Behind (NCLB) requires LEAs to describe the steps it will take to ensure collaboration with the State child welfare agency to ensure the educational stability of children or youth in foster care.

The LEA Homeless Liaison will serve as the Point of Contact (POC) coordinating with local DFCS. The POC will assume responsibility for communication and collaboration with the Case Manager and DFCS POC. This will ensure the smooth implementation of provisions outlined in ESSA to include:

- Best Interest Determinations;
- Appropriate and timely transportation plans for children placed out of zone of their school of origin;
- And immediate enrollment and records transfer.

The LEA POC will facilitate training for LEA staff with regards to the unique challenges of children in Foster Care, monitor attendance and progress of foster children enrolled in LEA, and ensure effective and confidential data collection sharing.

Coordination will occur between case managers, Education Support Monitor, Homeless Liaison, foster parents, and court appointed special advocates when applicable, regarding foster children entering and exiting care; changing placements; enrollment and withdrawal; and making best interest determinations. When transportation is an issue, those parties will collaborate to develop a transportation plan that meets the needs of the individual child.

LEA and DFCS will share transportation costs if additional costs are incurred. In the event of a dispute, agencies will defer to the Federal Program Director and DFCS County Director for final determination of resolution. LEA will provide or arrange for adequate or appropriate transportation during the dispute resolution process.

Notice to Parents

Parent Notification and Communication in an Understandable and Uniform Format. When parents mark on the enrollment form that they need correspondence in another language, to the extent practical, efforts are made to provide either written support or support through an interpreter. All Federal Programs staff ensure these efforts are supported, as well as school staff who are fluent in multiple languages. Furthermore, all parent communication is written in a format so that the content is easily understandable.

Notifications to Parents of English Learners

Local educational agencies (LEAs) are required to send notification, in a language and format appropriate for the reader, to parents of English Learners (ELs) who have been selected to participate in the LEA's Title III or Title I supplemental language program. This notice also permits the parent to waive participation in the Title-funded services. The Federal Programs Director will provide a template and coordinate with principals within the first 30 days of school to complete and send notices to parents with the required language and content. Copies of notices will be sent to the Federal Programs Director upon completion.

Professional Qualifications

The Lanier County School System systematically monitors professional qualifications of its teachers based on demographics and a written remediation plan is created for each teacher who meets the LEA Professional Qualification requirement but are NOT "In-Field" and teachers who do not meet the LEA Professional Qualification Requirements. In compliance with ESSA, under Title I, Part A, the Lanier County School System requires that all school principals have a remediation plan and monitor the progress of new hires, out of field teachers, and teachers who do not meet professional qualifications. These logs must be kept on file for periodic review.

A bi-annual review of SPED staff Professional qualifications will be conducted as described below.

October/November – Federal Programs Director and SPED Director will review SPED teacher schedules and In-Field reports to verify that SPED teachers meet Federal, State, & Local certification requirements.

March/April - Federal Programs Director and SPED Director will review SPED teacher schedules and In-Field reports to verify that SPED teachers meet Federal, State, & Local certification requirements.

Documents verifying SPED staff requirements will be kept on file.

Parents' Right to Know Teacher and Paraprofessional Qualifications

Parents are informed of their rights to know the qualifications of their children's classroom teacher and paraprofessionals in accordance with Every Student Succeeds Act (ESSA). This information will be sent home to every parent in the beginning of the year in the Parent/Student Handbook. This notice will occur within the first week of school. The notice will include the specific contact person and telephone number and email address. Parents will sign and date an acknowledgment form of receipt of the student handbook. This information is also made available through district and school websites and other newsletters sent home with students.

Professional Qualifications and Notice to Parents (20 Day Notification)

In accordance with the requirements of ESSA, Lanier County Schools is required to provide timely notice to parents when students have been assigned or taught for four or more consecutive weeks by a teacher who does not meet applicable state certification or licensure requirements (*including professional qualifications developed by the LEA in alignment with an approved charter or strategic waiver application*) at the grade level

and subject area in which the teacher has been assigned. Notification requirements apply to all teachers in all schools/programs in Lanier County. Notifications must be made within ten business days following the four consecutive weeks. Lanier County Schools has outlined PQ requirements in the District Improvement Plan.

Notification letters will include:

- Day/month/year of notification
- Name of the teacher who has not met professional qualification requirements
- Name of the LEA and/or school/program and the point of contact, by position
- Statement that the teacher has not met state certification Or LEA charter/strategic waiver professional qualification requirements for the grade level(s) and/or subject area(s) in which the teacher is assigned.
- Grade level and/or subject area must be identified

The Federal Programs Director/Personnel Director will identify teachers who don't meet certification and licensure requirements. The Federal Programs director will collaborate with principals to identify students taught by the teachers. The Federal Programs Director/Personnel Director will provide template letters to principals for students. Principals will send letters to parents of students taught by teachers identified above within 10 days following the fourth consecutive week that instruction is provided by the teacher. Principals will send the letters in English and the language identified by parents in the home language survey to ensure that parents receive the notice in a language they may understand. Copies of letters will be sent to the Federal Programs Director for documenting the notices.

Title I, Part A - Parent and Family Engagement

Parent and Family Engagement Policy Overview

Lanier County Schools has an on-going commitment to our Title I parents. Parent 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. As a conduit for their children's success, the district will assist parents of all socioeconomic levels in solidifying their ongoing commitment to their child's success. The Family-School Partnership Program ensures that Title I, Part A parent and family engagement regulations are met with meaningful and strategic actions to build parent and school staff capacity as mandated by the *Every Student Succeeds Act* (ESSA), which reauthorizes the Elementary and Secondary Education Act of 1965 (ESEA) and No Child Left Behind (NCLB). Schools and districts must ensure that strong strategies are in place to: 1) build capacity to engage parents/stakeholders in an effective partnership with the school; and 2) share and support high student academic achievement. The Partnership Program believes that parents, schools, families, and communities working together can create meaningful partnerships that ultimately lead to significant gains across the board in student achievement.

Parent and Family Engagement Policies

The Combined District and School Level Parent and Family Engagement Policy is reviewed and revised annually with parents and other stakeholders (teachers, principals, administrators, other school personnel, and community members). The district will hold a meeting for review of the Combined District and School Level Parent and Family Engagement Policy and each individual schools' compacts. All Title I parents, teachers, administrators, and other school personnel in the district will be invited to the meetings to provide input. Notification of the meeting is conducted through newsletters, on the district/school website, and through the phone alert system. Parents and other stakeholders (community members) will be notified by invitation sent from each individual school. Parent notices will be sent home from the school. District parents that cannot attend the meeting will be given the opportunity to obtain a copy from the Parent and Family Engagement (PFE) Coordinator and submit input before the final revisions are approved. The PFE Coordinator will be

responsible for collecting the required information (agenda, meeting notes, and sign in sheets) and submitting to the Federal Programs Director. The district will hold the meeting in the spring to revise plans for the next school year. The parent and family engagement policy checklists will be applied to the combined district and school policy. The Federal Programs Director provides guidance on procedures for the revision process and reviews updated plans using the appropriate checklist to ensure all components meet compliance before final approval is given for plans to be copied and distributed. Revision dates will be clearly marked on each policy. The Federal Programs Director will review policies during on-site monitoring visits. Plans include activities/workshops that have been identified and requested through the previous year's annual parent involvement survey. Parents and community members are encouraged to evaluate ongoing programs throughout the year as well and responses from parents via email/calls or written responses from surveys used when updating the policy for the following school year. The Federal Programs Director provides support throughout the year for developing plans and evaluating their effectiveness by providing technical assistance through meetings and emails. School improvement and parent and family engagement policies are posted on the website, available at the school, and hard copies are either in the student handbook, sent home with the back to school packets, or within the first month of school with signed papers.

Each school in Lanier County holds an annual open house. These meetings give parents the opportunity to review and provide feedback on system-wide student data, parent activities, district and school parent and family engagement plans, Comprehensive Needs Assessment, and Comprehensive Improvement Plans. Parents are notified about this opportunity through advertisements in local media, school-level flyers, social media websites, the automated calling system, and the system website. The school district uses the comments provided by parents during the annual review/revision of documents at the annual System Leadership Data Retreat, parent workshops, and Parent Advisory Council. After the school system review/revision process, district and school parent and family engagement policies are made available to parents on the district website and on Title I schools' websites. Copies are also available in the Parent Resource Center. Parents are also given the opportunity to provide feedback about Title I programs by completing annual parent surveys. These comments are used by the District and Title I schools when planning parenting programs.

Distribution of Completed Plans

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

Plans include district and school improvement plans, parent and family engagement policies, school compacts, comprehensive needs assessments, parents' right to know, complaint procedures, and policies on ethics, fraud, waste and abuse, and corruption. Many of these plans are included in student handbooks. An automated calling system and information in back to school packets inform parents about the availability of these plans. Parental input into the content of each plan is solicited during multiple meetings throughout the school year but especially at the annual Title I meeting conducted each fall.

School-Parent Compacts

All Title I schools are required to have school-parent compacts. It is the responsibility of the Parent and Family Engagement Coordinator, in coordination with each school's stakeholder's (administrators, teachers, school staff, parents, students), 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 annual Parent Advisory Council meetings, school leadership data retreats, and parent workshops. Revision dates (month, day and year) will be clearly marked on each compact. Invitations for parent input will be sent home to all parents in the school and meeting dates will be given in school newsletters and through the school's website. The Parent and Family Engagement Coordinator will be responsible for setting up meetings and collecting required information (agenda, meeting notes, and sign in sheets). School-parent compacts will include responsibilities for the teacher, parent, and students. Compacts

will be distributed to all parties involved for signatures in the fall of the year prior to November 1st. The Lanier County Board of Education believes that the public schools belong to the people who create them and that student educational goals should reflect the goals of the community. We affirm and assure the rights of parents to participate in the development of the goals and objectives of the public schools and encourage involvement in all areas of their children's educational experiences.

The PFE Coordinator meets in the spring of each year with principals, instructional lead teachers/academic coaches, assistant principals, school leadership teams, teachers, parents, and students to provide training on developing effective compacts for achievement. Specific compact compliance handouts are provided to all stakeholders during training. The PFE Coordinator works collaboratively with the schools to develop specific academic improvement goals and strategies including activities or strategies for parents and students to achieve the defined goals for academic success. The achievement goals for the compact are determined by the comprehensive needs assessment and data analysis.

Parents and additional stakeholders will be trained at input meetings in the spring on the specific student/school needs determined as the goals on the effective and compliant compact. Opportunities will be provided to give additional input on the schools' improvement goal(s) and concrete activities/strategies parents can do to build and develop a partnership to help their child(ren) achieve the goals for academic success. Parents will be invited to each school's Data Retreat to collaboratively develop the compact. Students will also have the opportunity for input as to their responsibility in achieving the improvement goals at the evening input meetings as well as a special spring meeting.

Capacity for Parent Involvement

Information is provided to school personnel and parents on how to build parent capacity through presentations made during meetings, through response to parent needs on surveys, through information received from the GaDOE Parent and Family Engagement department, and through student handbooks, newsletters/flyers. The PFE Coordinator considers and plans based on the six requirements for building capacity by answering the following questions:

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

Annual Title I Meeting

All Title I schools are required to hold an annual meeting at the beginning of school. It is the responsibility of the principal in coordination with the PFE Coordinator to arrange meeting times and invite all stakeholders to the meeting. The PFE Coordinator will be responsible for collecting and submitting documentation of the required Title I annual meeting, including a copy of the invitation to parents, sign in sheet, agenda, and minutes to the Federal Programs Director. The Annual Title I Meetings are held before or after open house/back to school meetings. Meetings are also announced via paper copies to parents, website, call system, and marquee at each school as Title I Meetings.

Annual Evaluation

Process to Collect: The annual survey is provided to schools after parent advisors have reviewed and made suggestions for improvement of the survey. The parent survey is conducted in the spring online however,

parents are informed of the availability of a paper survey if they so desire. Advertisement of the surveys and requests for completion occur through the newspaper, newsletters, website, automated phone calls, and word of mouth. The surveys are collected and compiled and the following year's parent involvement activities are built from the responses.

Process to Review: The results of the surveys are shared among several groups of stakeholders, including, but not limited to, parents, school and central office administration, and community stakeholders. School/District Leadership Team members and those attending the annual Title I meeting review the results of the surveys while reviewing and revising the schoolwide and parent involvement plans and components.

Actions Taken by LEA to Improve the Quality and Effectiveness of Parent Involvement Policies and Practices: The Federal Programs Director and PFE Coordinator review the annual spring survey as well as the results from the previous spring surveys during Federal Program Reviews with building level administration. Additions/deletions/revisions are discussed and agreed upon during this meeting. Formatting and revisions are made after the meeting and then sent back for comment. If no further suggestions are made, the surveys are sent to schools to print and send to parents without being embedded in other materials. Lanier County Schools will utilize the grade-span specific survey templates provided in the *Systemic Family Engagement: A Comprehensive Guide to Implementing an Effective Title I Parental Involvement Program*, to guide the development of the parent survey.

Parent engagement workshops and activities are planned for the following year from the annual spring survey results. Materials are also purchased for the parent resource center from expressed needs. Many opportunities are provided for building strong parent capacity to support academic achievement. The purpose is to ensure effective engagement of parents and to support a partnership among the schools, parents, and the community to improve student academic achievement through, at minimum, the following activities: Annual meetings; Conferences; E-mail communications; Phone calls; Parent workshops and activities; Family nights; Volunteering; Parent advisory meetings; Open Houses; Annual notification of CCPRI status; Newsletters/flyers/brochures; Website information; and Board of Education meetings.

Parent Information and Resource Center

A parent resource center is available at Lanier County Primary School for all Title I parents. A variety of materials and resources are available to parents for use at the school for checkout or as handouts. Books, tapes, videos, DVDs, and a variety of other materials have been purchased for the parents. Many purchases are based upon parent requests on the parent engagement surveys (i.e., helping with homework, information regarding bullying). Parents are informed of the system's Parent Resource Center through presentations made at parent meetings as well as through flyers/newsletters. Websites are also used to distribute information regarding the materials and resources available to parents. Parent engagement resources provided by GaDOE through webinar sessions are shared with the District PFE Coordinator, who is responsible for sharing and planning parent involvement initiatives and information for all schools.

Monitoring of School Improvement

All schools within the Lanier County School System conduct Schoolwide Programs. This allows all children and all parents an opportunity to have equal access to all related Title I assistance. All schools within an LEA will be involved in school improvement efforts through the work of the LEA, RESA, and GaDOE.

School Improvement Plans

School Improvement Plans are updated and revised each spring for the following school year. Each school leadership team conducts meetings at which representatives from each grade level, content area, and department, as well as administration, parents, and community stakeholders meet to develop a plan. School administrators then present the plan at the annual system leadership data retreat as they work with other schools,

system leaders, parents, and community stakeholders to develop a district improvement plan. It is through this process that the LEA oversees the development of school improvement plans. System leaders also support schools in developing, revising, implementing and coordinating school improvement/schoolwide plans during monthly DLT meetings and quarterly DPLC meetings. During these meetings, data is analyzed to identify and develop solutions to challenges related to instructional strategies, parent involvement, professional learning, and budgets. Additionally, monthly leadership team meetings are held at each school. During these various meetings throughout the school year, parents are involved in the planning, revising, and implementing phases of this process. Parents are also sent information inviting them to participate in the revision process at an annual Parent Advisory Council meeting via mail, email, telephone, flyers, website, and newsletters. Once revisions are made, the plan is shared with all stakeholders via website and hard copy in each school office.

Review and Approval Process of School Improvement and Schoolwide Plans

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

Title I, Part A: School Improvement 1003(a) (84.010)

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

Title I, Part A: School Improvement 1003(g) SIG (84.377)

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

Title I, Part C - Education of Migratory Children (MEP) Services

The Lanier County school district uses the occupational survey provided by the MEP coordinator to identify migrant students. A system liaison from the Migrant Education Program (MEP) contacts each migrant family to determine case-by-case eligibility and needs. Migrant students are evaluated academically the same as other students in the system to determine academic needs. All migrant students are eligible for Title I services, and receive appropriate Title I services. In addition, a referral is made to student services to indicate that additional services may be needed from that department. Additionally, specific activities to address the needs of migratory families are provided. Such activities shall include informing children and families of, or helping such children and families gain access to other education, health, nutrition and social services. A migratory Parent Advisory Council (PAC) program is provided in conjunction with other Parent Involvement Programs. Parent outreach is provided in a language that is understood by the family, if possible. Parents are presented information on ESOL, special education, gifted, and other educational programs. Information on health, nutrition and social services is presented using materials from the migrant educational agency. Presenters from local agencies such as the Health Department, DFACS, and County Extension office may be involved. Migrant staff will participate in necessary MEP training and local training to build staff capacity to meet MEP program requirements and provide quality services to MEP students and youth.

Title I, Part D: Services for Neglected and Delinquent Children (Neglected Set-Aside)

The purpose of Title I, Part D is to improve educational services for children and youth in local and State institutions for neglected or delinquent children and youth so that such children and youth have the opportunity to meet the same challenging state academic content standards and challenging state student academic achievement standards that all children in the state are expected to meet. The purpose is also to provide such children and youth with the services needed to make a successful transition from institutionalization to further schooling or employment and to prevent at-risk youth from dropping out of school, and to provide dropouts, and children and youth returning from correctional facilities or institutions for neglected or delinquent children and youth, with a support system to ensure their continued education.

Currently, there are NO Neglected or Delinquent institutions in Lanier County.

In the event a neglected and delinquent institution opens within the county, Lanier County School System will serve these students using funds set aside in the Title I budget for neglected institutions. The Federal Programs Director will work with the N&D institution to ensure that students are receiving needed services by meeting with house parents at a minimum, annually. The Federal Programs Director will maintain meeting minutes, agendas, collaborative planning, emails, and phone logs. Equipment will be inventoried annually and all staff will be trained annually on meeting the needs of neglected students.

Class Schedules and Calendar

If N&D students enter our school system, they will attend school on the campus of the Lanier County School System and follow the same academic calendar and schedules as all students in the school system.

Title II, Part A: Supporting Effective Instruction

The purpose of Title II, Part A is to provide grants to State educational agencies and sub grants to local educational agencies to increase academic achievement by improving the effectiveness of teachers, principals, and other school leaders.

Equity Belief Statement

The Lanier County School System believes all students should have equitable access to academic instruction by effective teachers. The Lanier County School District strives to recruit, prepare, train and support high effective teachers, paraprofessionals and leaders in our school system. We are also focused on developing school and district level improvement plans with measurable objectives that will ensure that all teachers and paraprofessionals maintain professional qualifications.

Equity Plan

The Lanier County School System Equity Plan for Title II-A is revised each May/June using the needs assessment survey and other forms of current data. The Equity Plan serves as the plan detailing professional learning and effective equitable access to effective teachers. Department Directors, school and system leaders, as well as, community and parent stakeholders are to be involved in the revision process as a part of the needs assessment. As the Equity Plan is revised, it is shared with elementary, middle, and high school leadership teams. Principals seek input from school council members (administrative staff, teachers, community business partners, and parents) and then give feedback for revisions. Meeting agendas and sign-in sheets will be maintained as evidence and documentation of stakeholder involvement in the revision process. Documentation supporting the Equity Action Plan initiatives is maintained at the central office by the Federal Programs Director. The Equity Plan is embedded in the Comprehensive LEA Improvement Plan (CLIP).

Prioritization of Needs

Internal and external stakeholders are involved in the planning process by assisting with the prioritizing of needs. Prioritization of needs is accomplished by analyzing the percentage of responses to various questions on the annual needs assessment. In addition, prioritization is discussed with stakeholders during meetings. Information gathered from various meetings is discussed by the district leadership team, consisting of the Superintendent, Associate Superintendent, Assistant Superintendent, district directors, and principals. The Federal Programs Director then combines the feedback from various stakeholders and creates a final prioritized list of needs.

Authorized Use of Funds

Title II, Part A funds can be used for recruitment, retention, professional development, and class size reduction. These funds must be used to *supplement, and not supplant*, non-federal funds that would otherwise be used for activities authorized under Title II, Part A. The LEA may not use Title II, Part A funds to pay for activities that, in the absence of these funds, would be provided with state and local funds.

In the following instances, it is presumed supplanting has occurred if:

- The LEA used Federal funds (except Bilingual) to provide services that are required under other federal, state, or local laws.
- The LEA used Federal funds to provide services that were provided with non-federal funds in the prior year.

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

Effectiveness Evaluation

The Director of Federal Programs will draft a Title II, Part A Effectiveness Plan to assess planned budget expenditures aligned to the needs identified in the school and district improvement plans. The Federal Programs Director utilizes the template provided by GaDOE Title II, Part A program resources. The Effectiveness Plan must be submitted prior to budget approval and is uploaded as an attachment in the Consolidated Application. The plan is revised if a budget amendment is submitted due to a change in needs and/or a significant change in budgeted strategies. Assessment of effectiveness of federally funded activities is an ongoing process and is supported by frequent communication between the Federal Programs Director, school administrators, and staff. Various data is analyzed to determine effectiveness including student achievement results, process data, and stakeholder perception data. Historical and longitudinal data are reported and compared to evaluate the impact of interventions. This summary of program effectiveness is included in the subsequent year's Comprehensive Needs Assessment and is used to determine if previous interventions should be continued or if funds should be used to support different interventions. These results guide the development of the following year's program plan.

The Title II, Part A Effectiveness Plan must address:

- The Title II, Part A funded component(s);
- The need(s) being addressed;
- Identification of the Title II, Part A funded strategy;
- The data to be collected to determine effectiveness;
- The position of the person responsible for collecting the data and coordinating the review and analysis of the data; and
- The timeline for collecting data and completing the review and analysis of the data.

The Effectiveness Evaluation Plan is embedded in the CLIP monitoring and program evaluation plan.

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

The District Leadership Team discusses the recruitment, placement, and retention of professionally qualified, effective teachers and leaders during monthly meetings as necessary. The topic is also discussed as part of a review of data from the system annual needs assessment during district leadership team meetings held throughout the year. Specifically, each principal is required to report the level of retention from the previous school year and improvement with the placement of professionally qualified, effective teachers for the upcoming school year. System and school goals are then created or adjusted for the next school year. School and district administrators attend recruitment fairs when possible.

Teacher Experience and Effectiveness Equity

Teacher effectiveness is measured using two methods. First, informal walkthroughs are conducted at each school by administration and instructional coaches to gather data that can be used to guide professional learning activities. Secondly, administrators conduct formal observations as part of the Teacher Keys Evaluation System (TKES) and Georgia Teacher Evaluation Program (GTEP).

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

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

Class Size Equity

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

Meeting the Diverse Needs of Students

School administrators conduct focus walkthroughs as part of the system's implementation of the Teacher Keys Effectiveness System (TKES) to ensure that all classrooms follow the guidelines of a standards-based classroom and monitor the implementation of differentiated strategies. One of the standards assessed is the use of differentiation to meet the diverse needs of students. The data from these focus walkthroughs is compiled at the school and system level, examined by district level administrators and used to plan professional learning initiatives.

Lanier County Schools transfers 100% of Title II-Part A funds to Title I-Part A.

Title III, Part A - Language Instruction for English Learners (EL) and Immigrant (IMM) Students

The Lanier County School System does not receive federal funds for Title III, Part A. If our system were to receive federal funds under this program, written procedures will be developed according to federal guidelines and the district would assume responsibility for making sure all requirements are met.

Title IV, Part A - Student Support and Academic Enrichment

Purpose

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

- provide all students with access to a well-rounded education,

- improve school conditions for student learning, and
- improve the use of technology in order to improve the academic achievement and digital literacy of all students.

LEA Assurances of Funding Allocation

Each LEA establishes how it prioritizes the distribution of its Title IV, Part allocation via the Consolidated LEA Improvement Plan (CLIP). Clarity is essential to determining allocability, allowability, prioritization, and focus area. Lanier County Schools includes this information in the online CLIP in SLDS. Data analyses, trends and patterns, and potential root causes guide the decisions of evidence-based interventions, initiatives, activities, or programming planned for implementation. All initiatives, interventions, or activities identified in the CNA and addressed in the CLIP must be followed.

LEAs must assure that it will:

- Prioritize the distribution of funds to schools based on one or more of the following criteria:
 - are among those with the greatest needs;
 - have the highest percentages or numbers of low-income children/families;
 - are identified for comprehensive support and improvement;
 - are implementing targeted support and improvement plans; or
 - are identified as a persistently dangerous public elementary school or secondary school
- For an LEA receiving \$30,000 or more, funds must be distributed to support **each** of the three focus areas. LEAs receiving less than \$30, 000 must distribute funds to support **at least one** of the three focus areas.
 - Activities/interventions pertaining to well-rounded educational opportunities;
 - Activities/interventions pertaining to safe and healthy students;
 - Activities/interventions pertaining to effective use of technology via professional development/training.
- Private School: in support of initiatives/interventions/activities addressed during initial evidence-based initiatives/interventions/activities.

LEAs must select relevant, evidence-based activities that address the identified needs and the district should have the capacity to implement the activity or intervention. If the district has schools identified as comprehensive or targeted support and improvement, a plan must be developed which includes evidence-based interventions.

Lanier County Schools transfers 100% of Title IV-Part A funds to Title I-Part A.

Title IV, Part B – 21st Century Community Learning Centers

Purpose

The purpose of Georgia's Title IV, Part B, 21st Century Community Learning Centers Program is to provide federal funds for communities to establish or expand activities in community learning centers that operate during out-of-school hours and serve three specific purposes:

- To provide opportunities for academic enrichment and tutorial services to help students
- To offer students a broad array of additional services, programs, and activities that are designed to reinforce and complement the regular academic program; and
- To offer families of 21st CCLC students opportunities for active and meaningful engagement in their children's education.

The Lanier County School System does not receive federal funds for Title IV, Part B-21st Century Community Learning Centers.

Title V, Part B - Rural and Low-Income Schools Program

Purpose

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

Small, Rural School Achievement (SRSA): The SRSA program provides local educational agencies (LEAs) with greater flexibility in using the formula grant funds that they receive under certain state-administered federal programs. The U.S. Department of Education (US ED) calculates the SRSA grant allocations for an eligible LEA on the basis of a statutory formula and makes the SRSA grant allocations directly to the eligible LEAs. SRSA funds do not flow through the Georgia Department of Education (Department). It also authorizes formula grant awards directly to these LEAs for a wide range of local activities that support student achievement. The SRSA program provides flexibility to eligible, rural LEAs to use specific federal formula funds to support local activities under Title I, Part A, Title II, Part A, Title III, Title IV, Part A and /or Title IV, Part B to assist them in addressing local academic needs more effectively. To be eligible to participate in the SRSA grant, an LEA must:

- Have a total average daily attendance (ADA) of fewer than 600 students, or serve only schools that are located in counties that have a population density of fewer than 10 persons per square mile.
- All of the schools served by the local educational agency are designated with a locale code of 41, 42, or 43, as determined by the Secretary of Education.

Rural and Low-Income Schools Program (RLIS): The RLIS program is an initiative that provides grant funds to rural LEAs that serve concentrations of children from low-income families. An LEA is eligible to receive funds under the RLIS program if:

- 20-percent or more of the children age 5 to 17 served by the LEA are from families with incomes below the poverty line.
- All schools served by the LEA have a school locale code of 32, 33, 41, 42, or 43, as determined by the Secretary of Education.

Eligible systems apply for the RLIS funds through the consolidated application.

Use of Funds

An eligible LEA may use Title V-B funds for activities authorized under:

- Title I, Part A
- Title II, Part A
- Title III, Part A
- Title IV, Part A
- Parental Involvement activities

The Lanier County School System does not receive federal funds for Title V, Part B. If our system were to ever receive federal funds under this program, then we would follow all federal guidelines and assume responsibility for making sure all requirements are met.

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. Lanier County Schools does not receive Title IX, Part A grant funds.

Individual with Disabilities Education Act (IDEA)

Lanier County will follow the same Federal Programs Written Procedures for IDEA. Lanier County does not consolidate funds with IDEA.

Elementary and Secondary School Relief (ESSER) funds, Coronavirus, Aid, Relief & Economic Security (CARES); Coronavirus Response & Relief Supplemental Appropriations (CRRSA); American Rescue Plan (ARP)

ESSER Emergency Relief (CARES Act, CRRSA Act, and ARP Act) funds were provided to local school districts to help safely reopen and sustain the safe operation of schools and address the impact of the coronavirus pandemic. Funds are used for the following (not a complete list):

- To provide distance/remote learning and supplemental learning opportunities,
- To support the social, emotional, mental health, and academic needs of all students,
- To provide for social distancing and safety protocols on buses,
- Funding Wi-fi hotspots and devices for students with connectivity issues for remote learning and supporting educators in the effective use of technology,
- To support continuity of school meals and enhance mental/physical health supports,
- To address facility needs and adaptations, including the purchase of personal protective equipment,
- To address professional development needs, and
- To address revenue shortfalls and allow for the continuity of core staff and services

School Facility Repairs

Lanier County Schools will use Emergency Relief Funding (CARES, CRRSA, ARP) for construction costs.

Maintenance of Equity Procedures

MOEquity is a set of new fiscal equity requirements in ARP ESSER. Specifically, MOEquity ensures the following:

- LEA does not disproportionately reduce State and local per-pupil funding in high-poverty schools
- An LEA does not disproportionately reduce the number of full-time-equivalent (FTE) staff per pupil in high-poverty schools.

Under section 2004(c)(2) of the ARP Act, an LEA need not maintain equity if the LEA

1. Has a total enrollment of less than 1,000 students;
2. Operates a single school;
3. Serves all students within each grade span with a single school; or
4. Demonstrates an exceptional or uncontrollable circumstance, such as unpredictable changes in student enrollment or a precipitous decline in the financial resources of the LEA as determined by the Secretary.

Lanier County is exempt from maintaining equity because we serve all students within each grade span with a single school.

ESSER funds do not have a supplement not supplant provision.

Lanier County will follow the same Federal Programs Written Procedures for Elementary and Secondary Relief funds including Education Stabilization funds for ESSER: Section 18003 of Division B of the Coronavirus Aid, Relief, and Economic Security (CARES) Act; Section 313 of the Coronavirus Response and Relief Supplemental Appropriations (CRRSA) Act, 2021 and Section 2001 of the American Rescue Plan (ARP) Act.

All construction related projects will first be approved by the GaDOE program manager for CARES, CRRSA, or ARP. Pre-Approval will be documented on the “Expenditure Pre-Approval Form -ESSA, CARES Federal Programs”. The Construction Cost Assurances Form will be completed by the superintendent and submitted to the GaDOE via the portal. Construction contracts and projects will comply with the Davis Bacon Wage Act. Any projects funded through these sources will not be in the existing Facility Plan and will meet the requirements of the respective fund source.

Construction contracts will be awarded and approved as per procurement procedures listed earlier in the manual. Assurances will be included in the RFPs and construction contracts. The system architect will receive construction contract requests for payment. The architect will review the requests for accuracy and reconcile any inaccuracies. The architect will submit the request to LCS for payment. LCS verifies that construction expenditures meet Davis Bacon Wage Act requirements and any other federal requirements. Once verified, LCS issues payment. Change orders must have prior approval of the contractor, architect, and superintendent.

Employees may receive hazard pay for national or local emergencies 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.

ESSER CARES ACT

The Coronavirus Aid, Relief, and Economic Security (CARES) Act was passed by Congress and signed into law by President Trump on March 27, 2020. The funding provides flexibility for states to respond to the COVID-19 emergency in K-12 schools. Funds to local school districts may be used for coronavirus response activities, such as planning for and coordinating during long-term school closures, purchasing educational technology to support online learning for all students, and additional activities authorized by federal elementary and secondary education laws.

ESSER CRRSA ACT

The Coronavirus Response and Relief Supplemental Appropriation (CRRSA) Act signed into law by President Donald Trump on December 27, 2020, provides an additional \$54.3 billion for an ESSER II fund. Following the same distribution as the CARES Act, which is based on the share of ESEA Title I, Part A funds follow the same use for coronavirus-response activities. Planning for and coordinating activities that address learning loss, preparing schools for reopening, testing, repairing, upgrading projects to improve air quality in school buildings, and additional activities authorized by federal elementary and secondary education laws are continually permitted.

ESSER 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 allow LEAs to take additional steps to safely reopen schools for in-person instruction and keep them open, and to address the disruptions to teaching and learning resulting from the pandemic. This includes using funds to enact appropriate measures to help schools to invest in mitigation strategies consistent with the Centers for Disease Control and Prevention’s (CDC) Operational Strategy for K-12 Schools to the greatest extent practicable; address the many impacts of COVID-19 on students, including from interrupted instruction; implement strategies to meet students’ social, emotional, mental health, and academic needs; offer crucial summer, afterschool, and other extended learning and enrichment programs; support early childhood education; invest in staff capacity; and avoid devastating layoffs at this critical moment, ensuring that all students have access to teachers, counselors, and other school personnel to support their needs.

Federal Program Statutes

Federal grants are subject to federal laws and any additional requirements specified in state laws. The following statutes are the most commonly applicable to federal programs in Georgia.

- Elementary and Secondary Education Act of 1965 (ESEA) as amended by Every Student Succeeds Act, 2015 (ESSA)
- Individuals with Disabilities Education Act (IDEA)
- Elementary and Secondary School Emergency Relief Fund
- The Official Code of Georgia (OCGA) - Title 20 Education, State Board of Education (SBOE) rules, Georgia Professional Standards Commission (GaPSC) rules

Federal Program Regulations

Regulations further detail the requirements of the laws.

Federal Program Guidance

Non-regulatory guidance usually serves to outline and describe the goals of the statute or regulations for which it was developed. State education Agencies (SEAs) and local education agencies (LEAs) that adhere to non-regulatory guidance are more likely to achieve the goals of the grant and comply with relevant laws and regulations. The following guidance supports the statutes and regulations governing key federal programs.

- ESSA Early Learning Guidance, 2016
- ESSA Fiscal Changes and Equitable Services Guidance, 2016
- ESSA Title IV, Part A Guidance, 2016
- ESSA Title II, Part A Guidance “Building Systems of Support for Excellent Teaching and Leading”, 2016
- ESSA English Learners and Title III Guidance, 2016 and Addendum January 2019
- ESSA Schoolwide Guidance, 2016 • ESSA Title I, Part C Guidance, 2017
- ESSA Using Evidence to Strengthen Education Investments Guidance, 2016
- Education for Homeless Children and Youths Program, Updated August 2018
- Ensuring Educational Stability for Children in Foster Care, June 23, 2016

Transferability of Federal Funds

LEAs may transfer up to 100% of funds from Title II and Title IV, Part A **TO** Title I, Part A; Title II, Part A; Title I, Part C; Title I, Part D; Title III, Part A; and Title IV, Part A. In order to transfer funds, the intent to transfer must be articulated in the fiscal year’s CLIP.

When transferring funds from Title IV, Part A to another program, the LEA is required to indicate this information in the CLIP as part of its improvement plan so that stakeholders are aware of and approve of the plan to transfer. If the LEA did not originally plan to transfer funds, and priorities or needs change after the CLIP was approved by GaDOE, the LEA should communicate its revised plan to adjust the utilization of Title IV, Part A funds to its stakeholders and community-based partners and amend the CLIP.

If an LEA has funds that were identified as short-fall dollars due to not meeting statute minimums the previous fiscal year, cannot be transferred the next fiscal year.

Funds transferred into a program become subject to all rules and regulations of the receiving program. Equitable services requirements are not waived, and timely and meaningful consultation must occur prior to transferring funds from one program into another program. An LEA must notify the state, in writing (email), of its intent to transfer funds, including the amount, to another program at least 30 days prior to the transfer and prior to submitting the budget for approval. Please send the notification to originating program’s manager or designee, receiving program’s manager or designee, and GaDOE’s Grants Accounting Department. If the transfer modifies any aspect of the LEA’s approved CLIP, the CLIP modifications must be submitted no later than 30 days after the transfer is made.

In the originating Budget, include from program as appropriate to program as appropriate using function 5000, object 930, amount of transferred funds, and the transferred amount will be displayed on the completion report.

The completion report will show from where the transferred amount originated (Original, Carryover, Additional).

Since the transferred amount is not brought into the Grants Accounting Online Report System (GAORS), the amount transferred to another program will have to be drawn down from the originating program. The district will track the drawdowns at the local level.