Louisville Municipal School District

Federal Programs Procedural Handbook

2024-2025

A procedural framework for administering federal grants in
Louisville Municipal School District.

WRITTEN ALLOWABILITY PROCEDURES [200.302(B)(7)]
Indicator A-1, A-2, H-5

Ensuring Allowable Expenditures

The purpose of this procedure is to ensure federal funds are spent only on allowable activities in accordance with CFR Part 200 Subpart E-Cost Principles, other special terms or conditions of the grant award, and/or other applicable state and federal guidelines. In determining allowable costs, the district will use the guiding principles as established in this document.

Allowable costs must meet the following factors as outlined in CFR Part 200.403.

- Necessary, reasonable, and allocable;
- Conform with federal law and grant terms;
- Consistent with state and local policies and procedures;
- Consistently treated;
- In accordance with generally accepted accounting principles (GAAP);
- Not be included as a match;
- Net of applicable credits; and
- Be adequately documented.

Necessary

Necessary is determined by the needs of the program. The expenditure must be necessary to meet an objective/goal of the program and is necessary in achieving the goals of the grant in improving student academic achievement. The comprehensive needs assessment process and the identification of priorities are tools used to identify if expenditures are necessary. When determining a cost is necessary, the district considers:

- Whether the cost is needed for the proper and efficient performance of the grant program;
- Whether the cost is identified in the approved school wide plan, budget, and/or application;
- Whether there is an educational benefit associated with the cost;
- Whether the cost aligns with identified needs based on the results of the comprehensive needs assessment; and
- Whether the cost addressed program goals and objectives and is based on program data.

Reasonable

Based upon EDGAR 200.404, costs must be reasonable. A cost is reasonable if, in its nature and amount, it does not exceed that which would be incurred by a prudent person under the circumstances prevailing at the time the decision was made to incur the cost. In determining reasonableness of a given cost, consideration must be given to:

- Whether the cost is of a type generally recognized as ordinary and necessary for the operation of the non-Federal entity or the proper and efficient performance of the Federal award.
- The restraints or requirements imposed by such factors as; sound business practices; arms-length bargaining; Federal, state, local, tribal, and other laws and regulations; and terms and conditions of the Federal government.
- Market prices for comparable goods or services for the geographic areas.

- Whether the individuals concerned acted with prudence in the circumstances considering their responsibilities to the non-Federal entity, its employees, where applicable its students or membership, the public at large, and the Federal government.
- Whether the non-Federal entity significantly deviates from its established practices and policies regarding the incurrence of costs, which may unjustifiably increase the Federal award's cost.

Allocable

Based upon EDGAR 200.405, costs must be allocable.
- A cost is allocable to a Federal award or other cost objective if the goods or services involved are chargeable or assignable to that Federal award or cost objective in accordance with relative benefits received. This standard is met if the cost:
    - Is incurred specifically for the Federal award;
    - Benefits both the Federal award and other work of the non-Federal entity and can be distributed in proportions that may be approximated using reasonable methods; and
    - Is necessary to the overall operation of the non-Federal entity and assignable to the federal award in accordance with the principles in this subject.
- A cost can only be charged in proportion to the value received by the program.
- Allocable costs cannot be charged to other Federal awards to overcome fund deficiencies, to avoid restrictions imposed by Federal Statutes, regulations, or terms, and conditions of the Federal awards, or for other reasons. However, the prohibition would not preclude the non-Federal entity from shifting costs that are allowable under two or more Federal awards in accordance with existing Federal statutes, regulations, or the terms and conditions of the Federal award.
- If a cost benefits two or more projects or activities in proportions that can be determined without undue effort or cost, the cost should be allocated to the projects based on proportional benefits.
- If a cost benefits two or more projects or activities in proportions that cannot be determined because of the interrelationship of the work involved, then notwithstanding 200.405(c), the costs may be allocated or transferred to benefitted projects on any reasonable documented basis.

Procedures for ensuring requisitions are necessary, allowable and reasonable: Indicator A-1, A-2

Except where otherwise authorized by statute, costs must meet the following general criteria in order to be allowable under Federal awards:

(a) Be necessary and reasonable for the performance of the Federal award and be allocable thereto under these principles.

(b) Conform to any limitations or exclusions set forth in these principles or in the Federal award as to types or amount of cost items.

(c) Be consistent with policies and procedures that apply uniformly to both federally-financed and other activities of the non-Federal entity.

(d) Be accorded consistent treatment. A cost may not be assigned to a Federal award as a direct cost if any other cost incurred for the same purpose in like circumstances has been allocated to the Federal award as an indirect cost.

(e) Be determined in accordance with generally accepted accounting principles (GAAP), except, for state and local governments and Indian tribes only, as otherwise provided for in this part.

(f) Not be included as a cost or used to meet cost sharing or matching requirements of any other federally financed program in either the current or a prior period.

(g) Be adequately documented.

A cost is reasonable if, in its nature and amount, it does not exceed that which would be incurred by a prudent person under the circumstances pre-veiling at the time the decision was made to incur the cost. The question of reasonableness is particularly important when the non-Federal entity is predominantly federally-funded. In determining reasonableness of a given cost, consideration must be given to:

(a) Whether the cost is of a type generally recognized as ordinary and necessary for the operation of the non-Federal entity or the proper and efficient performance of the Federal award.

(b) The restraints or requirements imposed by such factors as: sound business practices; arm's-length bargaining; Federal, state and other laws and regulations; and terms and conditions of the Federal award.

(c) Market prices for comparable goods or services for the geographic area.

(d) Whether the individuals concerned acted with prudence in the circumstances considering their responsibilities to the non-Federal entity, its employees, where applicable its students or membership, the public at large, and the Federal government.

(e) Whether the non-Federal entity significantly deviates from its established practices and policies regarding the incurrence of costs, which may with those requirements, the non-Federal entity's application of cost accounting practices for estimating, accumulating, and reporting costs for other Federal awards and other cost objectives under the CAS-covered contract still must be consistent with its cost accounting practices for the CAS- covered contracts. In all cases, only one set of accounting records needs to be maintained for the allocation of costs by the non-Federal entity.

Prior Written Approval [200.407]
To avoid subsequent disallowance, the District may seek prior written approval of the Mississippi Department of Education in advance of the incurrence of special or unusual costs.

Procedure for Submission of Federal Cash Transaction Report
The district requests funds monthly. Requests are to be received at SDE no later than the 12th of the month. The Bookkeeper is responsible for the preparation of the Request for Funds. They prepare the requests for funds each month using the budget reports which reflects the revenues and expenditures for a specific fund for the previous month. This is also when travel that has not occurred is subtracted out of the draw down request. The Business Manager runs system reports to determine cash needs after Marathon is out of calculation and sends the hardcopy of these reports to the OFP to document communication between the two

departments. The district received instructions from SDE for the preparation of the request for funds. These instructions are maintained on file at the district office.

It is imperative that all financial records and supporting documentation be maintained on a timely basis and includes accurate and reliable information. All funds received shall be entered into the district's accounting system and reconciled monthly to ensure accountability and accuracy.

WRITTEN CASH MANAGEMENT PROCEDURES [200.302(B)(6)]
Indicator A-1, A-2, A-6

Grant funds received shall be recorded and disbursed in accordance with good cash management principles as identified by law. Grant funds are requested and disbursed electronically. Requests for reimbursement shall include only expenditures related to the project elements and the period as identified in the agreement.

Requests for reimbursement are required to be submitted by no later than the 12th day of each month unless communication is received otherwise. Grant Funds requested should be disbursed within three (3) days of receipt.

In addition, the LMSD will ensure that our internal accounting system aligns with the approved funding application by maintaining separate accounting records for each federal grant which reflects the approved line items and mount by program year.

Period of Performance-federal funds may be obligated on the later of the date funds become available or the submission date of the grant application, in either full form, or "Substantially Approval Status," depending on the terms of the federal award. CARES, ESSER, ESSER II, ARP ESSER funds may obligate funds for allowable expenditures not before March 13, 2020, and no later than the date specified in the applicable grant.

Federal funds may not be expended subsequent to the end date of the grant except to liquidate allowable obligations that were made on or before that date. All liquidations of prior obligations must be made within the dates of the specific federal program.

FEDERAL AWARDS DRAW DOWN

- Print Expenditure Reports from school's financial system each month.
- Log into MCAPS.
- Request funds from the month from each Federal Fund with expenditure for that month.
- Approve each request in MCAPS. Print out the verification and approval from MDE emails.

ACCOUNTING RECORDS [200.302] LMSD Board policy DIAB
Indicators A-1, A-2, A-3, A-4, A-5, A-6

The Business Office in conjunction with other departments is responsible for maintaining the records that identify adequately the source and application of funds for federally-funded activities. These records must contain information pertaining to Federal awards, authorizations, obligations, unobligated balances, assets, expenditures, income and interest and be supported by source documentation. Types of source documentation maintained include:
- Reports in the Accounting System
- Requisitions with supporting documentation

- Purchase Orders
- Invoices
- Receiving Reports
- Checks Issued
- Bank Reconciliations
- Journal Adjustments

INTERNAL CONTROLS [200.303]

- The Louisville Municipal School District will establish and maintain effective internal controls over the Federal award that provides reasonable assurance that the district is managing the Federal award in compliance with Federal statutes, regulations, and the terms and conditions of the Federal award.
- The District will evaluate and monitor the compliance with statutes, regulations, and terms and conditions of Federal awards through annual independent audits. In addition, the Federal Programs office will undergo on-site monitoring according to guidelines set forth by MDE. The district will conduct site audits on federal program monitoring indicators annually.
- The District will take reasonable measures to safeguard protected personally identifiable information and other information designated as sensitive. Any reports used will have such information redacted.
- LMSD will also segregate duties and place checks and balances between departments and tasks assigned. This is to protect against waste, fraud and abuse and to ensure that data that is submitted (through Marathon, MCAPS, or to MDE) is submitted by one person and checked by another.

The Louisville Municipal School District Business Manager, at the direction of the Louisville Public School District Superintendent of Education, has developed a plan of Internal Controls designed to protect the integrity of all school district assets, liabilities, revenues and expenses. The plan of Internal Controls is such that the work of employees shall be subdivided so that no single employee performs a complete cycle of operations. Specific procedures are established for each area of administration and accounting ensuring proper authorization by designated official for all actions to be taken.

Administration controls include, but are not limited to, the plan of organization and the procedures and records that are concerned with the decision processes leading to the management's authorization of transaction. Such authorization is a management function directly associated with the responsibility for achieving the objectives of the organization and is the starting point for establishing accounting controls of transactions.

Accounting controls comprise of the plan of organization and the procedures and records that are concerned with the safeguarding of assets and the reliability of financial records and consequently are designed to provide reasonable assurance that the following is achieved:

A. Transactions are recorded in accordance with general or specific authorization of the management of LMSD.
B. Transactions are recorded as necessary to permit preparation of financial statements in conformity with Generally Accepted Accounting Principles, as well as any other criteria applicable to such statements, and to maintain accountability for assets.
C. Access to assets is permitted only in accordance with authorization of the management of the LMSD.
D. The recorded accountability for assets is compared with the existing assets at different and reasonable intervals action is taken if any differences are discovered.

Characteristics of LMSD's system of Internal Controls are:

A. Segregation of Duties' Responsibilities – There will be segregation of the authorization to execute a transaction, the recording of the transaction and the custody of the asset(s) involved in the transaction.
B. Authorization and Record Procedures – LMSD's management will ensure that approved procedures and methods (as outlined in this policy) are implemented and LMSD staff is directed to employ those procedures and methods in performing day-to-day operations of the school district.
C. Sound Practices – LMSD's system of Internal Controls establishes various error-checking routines that are performed in connection with record keeping, including periodic comparison or recorded amounts with existing assets and liabilities.
D. Quality of Personnel – The management of LMSD makes every effort to employ competent personnel in all areas of work. An emphasis is placed on the integrity of all personnel.
E. Actual System Performance – The management of LMSD makes every effort to ensure that the personnel of the district perform the duties and functions assigned to each. The integrity of the system of Internal Controls is protected when personnel operate it as designed.

The management of LMSD has developed specific Internal Control procedures and assigned specific personnel to five (5) broad areas of responsibility with the district. The five (5) areas include Revenues (Cash receipts), Expenses (Cash Disbursements), Encumbrances, Payroll and Inventory/Capital Assets. The specific Internal Control procedures and personnel assigned to each responsibility are outlined as follows:

Accounts Payable

Sends the invoice to the person responsible for initiating the purchase for a signature indicating that goods or services have been rendered or received if a packing slip or receiving report is not submitted in a timely manner.

Receives back signed invoices indicating that goods or services have been rendered or received in the absence of a packing slip or receiving report.

Matches signed invoices with copy of Purchase Order from the Open Purchase Order file.

Reconciles Purchase Order with Invoice, Investigates any discrepancies.

Delivers invoices that do not have Purchase Orders to the Business Manager for assigning General Ledger Code.

Delivers offline checks to appropriate destination.

Accounts Payable Clerk

Prints computerized Accounts Payable Checks.

Mails checks with required supporting documentation to vendors.

Writes check numbers and date paid on all claims

Files paid invoices with original Purchase Order by claim number in the appropriate Accounts
Payable Paid Invoice Filing Cabinet.
Files copy of check with appropriate purchase order/vendor.

Prints Claim Docket

Business Manager

Reconciles Bank Statement monthly.

Reviews Claim Docket

Board of Education

Reviews and approves claim dockets. LMSD seeks board approval each year to ratify claims dockets.

INTERNAL ACCOUNTING CONTROLS

Encumbrances

Employee Initiating the Purchase

Two quotes are required and must be attached if Purchase Requisition totals more than $5,000.

The person initiating the purchase delivers the Purchase Requisition to the principal's office.

Principal, Supervisor, Director

Reviews and signs Purchase Requisition granting authorization to request the issuance of a Purchase
Order.

Delivers the signed Purchase Requisition to the Federal Programs Director at the Central Office.

Federal Programs Bookkeeper

Obtains funding code from business manager or Federal Programs Director. Keeps one copy for his/her
records. Enters Purchase Requisitions into the Computerized Accounting System and generates an
official Purchase Order.

District uses electronic signature on purchase orders at the Central Office.

Follows the directions provided on the Purchase Requisition for distribution of the vendor copy of the
Purchase Order by mailing, faxing or returning to the person initiating the purchase.

Returns one copy of the Purchase Requisition with one copy of the approved Purchase Order to the
Principal, Director or Supervisor.

Attaches one file copy of the approved Purchase Order to the Original Purchase Requisition and files in
the open Purchase Order file in the Accounting Office for matching with the vendor invoices for
payment.

Reviews the open Purchase Order report. Follows up on all Purchase Orders that remain open for ninety (90) days or longer.

INTERNAL ACCOUNTING CONTROLS

Payroll

Superintendent Secretary

Receives from prospective employees' applications for employment.

Maintains an application file for prospective employees.

Completes background check on recommended employees

Upon approval of background checks substitute teachers are placed on district substitute teacher list. Schools are then notified of new substitute teachers in writing.

Principals, Supervisors, Directors

Recommends to the Superintendent of Education all certified and non-certified staff to be employed in the LMSD.

Superintendent

Recommends to the LMSD Board of Education that the school district enter into contract, in the manner prescribed by law, with all certified staff.

Recommends to LMSD Board of Education all non-certified staff to be employed by the school district.

Board of Education

Approves employment and salary/rate of all personnel in the school district.

Payroll Clerk

Distributes new employee employment package.

Receives new employee employment package from all approved new employees.

Builds new employee record in the Personnel/Payroll software of LMSD.

If applicable, generates a contract of employment for certified employees.

If applicable, enroll and builds new employee record in time and attendance system (for non-certified/hourly employees.

On a monthly basis, receives Time Card Reports for all hourly employees.

Principals, Directors, Supervisors

As required by federal law, all time sheets must be signed by the employee and the principal or supervisor. Other payroll forms must also have the appropriate signatures.

Employees who are paid from both federal and local funds must complete a time and effort sheet on a monthly basis. This form must be signed by the Federal Programs Director.

Ensures employees review Time Card Reports and signatures are acquired.

Returns Time Card Reports to LMSD Central Office/Payroll Clerk.

Semi-Annual Review

The Federal Programs Director will prepare the required forms for employees paid from one funding source with federal funds. The directors will obtain the necessary signatures from the direct supervisor at the end of the fall and spring semesters and retain the documents.

Federal Programs Salaries and Fringe Benefits

The Federal Programs Director will determine the list of employees being paid from federal funds for the upcoming year. This will be based on need and who was paid the previous year or replacements for those employees. The director will determine the salaries and benefits paid to each employee paid with federal funds and retain the list. The Business Manager will verify the salaries and benefits of each employee for accuracy and will enter the information in the district's accounting system which will automatically calculate the fringes for all employees based on federal law requirements.

Business Manager

On a monthly basis, enters hours worked from the Time and Attendance System into the LMSD Payroll System.

On a monthly basis, updates each employee record for the leave taken.

On a monthly basis, performs any other maintenance to employee records in LMSD Payroll System.

On a monthly basis, computes direct deposit reports and employee benefits/withholding checks.

On a monthly basis prepares ACH file report for bank.

On a monthly basis, makes available to all employees a paper copy of direct deposit stub

Mails and/or pays by EFT employee benefits/withholdings checks to vendors.

On a monthly basis, funds payroll using electronic banking

Business manager reconciles bank statements monthly.

INTERNAL ACCOUNTING CONTROLS

Capital Assets/Inventory Assets

Business Manager

Identifies all Capital Assets/Inventory Assets when reviewing purchase orders.

Fixed Asset Clerk

Enters the asset information into the software program and assigns the item an inventory tag (barcode).

Sends the tag to the responsible party using district form with detailed instructions. Technology **Department verifies item.**

Superintendent/Business Manager

Ensures that at least 2 physical inventories are accomplished each year.

BUDGET CONTROLS
Indicators A-3, A-4, A-5, A-6, Q-1,K-1, K-2, J-1, J-2, J-3, J-4, J-5, J-6, J-7

Planning and Creation of Budgets: In the spring of every year the LMSD will enter into meaning consultation with each principal (public and private) to begin building the budget for the federal grant as applicable. This is in an effort to build a district budget, as well as, guard against any infringement of other accounting regulations (e.g. exceeding the procurement limits as a district for any one commodity or service). The LMSD will also engage parents through District Wide meetings and the Comprehensive Needs Assessment (CNA). The LMSD will also engage stakeholders through Federal Programs Committee Meetings.

LMSD determines the Title I school site allocations based on the current MDE formula provided in MCAPS. Set asides are taken off of the top of the allocation, as well as, the private school's equitable share. Then MCAPS determines the Per Pupil Allocation allotted each student. The federal programs director then determines the school's allocation and per pupil allocation based on school needs.

Responsibility for Managing Budgets: The responsibility for managing budgets falls under the Director of the department to whom the budget is assigned.

Loading and Tracking Budgets: Indicator A-4, A-5, A-6

 The Business Office is responsible for ensuring budgets are properly entered into the district's financial accounting software system Marathon. Upon receipt of the approved budget, the following steps are followed:
- The Business Office or its designee will enter the budget into the financial accounting software system.
- An expenditure budget will be printed and compared to the approved budget pages.
- The process for payment for approved expenditures is two-fold. Payment will be authorized upon the receipt of a requisition, purchase order, invoice **and** a receiving document.

Comparing Budgets to Expenditures [200.302(b)(5)] Indicator: A-4, A-5, A-6

- Budget should be compared to expenditures at least once every two months.
- Budget pages will be printed from the financial package Marathon by fund, by program code, and by unit code (school).
- The expenditure budget should be reviewed to ensure funds are being expended in a timely fashion.
    - If funds are not being spent in a timely fashion, the Federal Programs Director (FPD) should work with the school or party to whom the budget is directed and determine the steps that should be taken to expend the budget.
    - If funds are not going to be expended as originally planned, the FPD will need to follow the revision guidelines and write a revision for the use of the funds.
    - In the event the expenditure page reflects unallowable expenditures or overspent funds, the budget should be reviewed, and the appropriate steps taken to rectify the budget.
    - If the expenditure in not allowable, the FPD should work with the Business Manager to adjust the expenditures through journal adjustments to charge the appropriate budget.
    - If the expenditure is allowable but charged to the wrong account, the FPD will work with the Business Manager to make appropriate journal adjustments and correct the account number.
    - If the expenditure is allowable but the budget has been expended, the FPD will work with the Business Manager to make appropriate journal adjustments and/or write revisions to cover the expenditure.

Applicable Credits [200.406] Indicator A-5

Applicable credits refer to those receipts or reduction-of-expenditure-type transactions that offset or reduce expense items allocable to the Federal award as direct or indirect (F&A) costs. Examples of such transactions are purchase discounts, rebates or allowances, recoveries or an indemnity on loses, insurance refunds or rebates, and adjustments of overpayments or erroneous charges. To the extent that such credits accruing to or received by the non-Federal entity relate to allowable costs, they must be credited to the Federal award either as a cost reduction or cash refund, as appropriate. LMSD will receipt this credit to the federal expenditure line-item cost as appropriate.

Process for Requesting Budget Revisions: Indicator: A-4, A-5, A-6

From Schools:
- The request will coincide with an entry into MCAPS to amend the school wide plan. The school wide plan revision should reflect how the request will address a weakness/need as indicated by data.
- The FPD will determine if the request fits the federal guidelines of reasonableness, allowability, and allocability.
- If the request is allowable, the FPD will be responsible for writing the revision.
- If the revision is approved by MDE, the FPD will work with the Business Office to make the necessary changes to the budget.

From District Office:
- Each grant period is identified through a general ledger code in the budget code.
- Budgets will be monitored by general ledger code to ensure the funds are expended within the grant period. (See procedures for Monitoring Budgets.)

- Within three months of a grant's obligation date, budgets will be closely examined. If it is identified the budget may not be expended during the period of availability and/or the school does not have plans or a need for the budget, the Federal Programs Director will write a revision to move the funds to another allowable budget area within the district.
- Upon MDE approval, the FPD will be responsible for ensuring funds are obligated and expended prior to the close of the grant period.

BUDGET ISSUES Indicator: A-4, A-5

The district's software accounting system will allow a requisition to be processed only if there are sufficient funds available in the account line. If there are not enough monies in a budget account line, you will need to prepare a "Budget Amendment Form". This form will need to be signed and dated by the principal or department head. The "Budget Amendment Form" will need to be sent or faxed to the Director of Finance. The budget amendment will be entered into the account software system, usually within a business day.

Utility expenses (water, gas and electricity) are not regular budget items. Therefore, you may not move excess budget amounts to other accounts nor do you have to cover any budget shortages in these accounts.

Telephone expense (object 414) is a regular budget item. Therefore, if all the monies in this budget are not needed for telephone expense, then the excess funds may be transferred to other accounts. Likewise, if the telephone expenditures exceed the budget amount, then monies must be transferred in from other accounts.

Carryover/Carry Forward Procedures Indicator B-1

LMSD will ensure that it meets the limitations on the amount of carryover funds or otherwise minimize the amount of funds it carries over into a subsequent fiscal year by meeting with the principals periodically. Timely budget print outs will be given to the principals to remind them of the balance of their budgets and the urgency with which the funds should be spent. In the case that schools are not spending the funds in a timely manner, the FPD will meet with the principal to rectify the situation and take appropriate disciplinary action, if needed. This will allow the principal the technical assistance that is needed and the FPD the ability to bring the budget into compliance. Schools are reminded to use the "oldest funds" first and this is monitored through Marathon. Monthly monitoring of the budgets is conducted through the draw down procedures. The Business Manager is responsible for clearly capturing the separate fiscal funding through Marathon. The balance of the year of the fund is "carried over" into the new fiscal year.

RESPONDING TO AUDITS LMSD POLICY DID, INDICATOR C-1, C-2

Auditors must report (for major programs): Significant deficiencies and material weaknesses in internal controls, significant instances of abuse, material noncompliance and known questioned costs greater than $25,000. LMSD will respond to any audit findings in a prompt and timely manner. Upon receipt of a finding the Superintendent, Business Manager and FPD will meet to fully investigate the findings. Other personnel may be called in to confer as needed. LMSD will respond to each finding in writing and supply any necessary documentation. LMSD will also list corrective actions to prevent any such findings from happening in the future.

- The Louisville Municipal School District will establish and maintain effective internal controls over the Federal award that provides reasonable assurance that the district is managing the Federal award in compliance with Federal statutes, regulations, and the terms and conditions of the Federal award.
- The District will evaluate and monitor the compliance with statutes, regulations, and terms and conditions of Federal awards through independent audits. In addition, the Federal Programs office will undergo on-site monitoring according to the results of the current "Risk Assessment Tool" used by MDE.
- LMSD will also segregate duties and place checks and balances between departments and tasks assigned. This is to protect against waste, fraud and abuse and to ensure that data that is submitted (through Marathon, MCAPS, or to MDE) is submitted by one person and checked by another.
- The District will take reasonable measures to safeguard protected personally identifiable information and other information designated as sensitive. Any reports used will have such information redacted.

D2. WASTE, FRAUD AND ABUSE

Purpose

LMSD shall not tolerate fraud, waste, abuse or corruption of any kind and has an established procedure for the reporting and investigating of suspicious activities.

Definitions

"Fraud" means the intentional deception perpetrated by an individual or individuals, or an organization or organizations, either internal or external to LMSD that could result in a tangible or intangible benefit to themselves, others, or the locality or could cause detriment to others or the locality. Fraud includes a false representation of a matter of fact, whether by words or by conduct, by false or misleading statements, or by concealment of that which should have been disclosed, which deceives and is intended to deceive.

"Waste" means the intentional or unintentional, thoughtless or careless expenditure, consumption, mismanagement, use or squandering of resources owned or operated by the locality to the detriment or potential detriment of the locality. Waste also includes incurring unnecessary costs because of inefficient or ineffective practices, systems, or controls.

"Abuse" means the excessive or improper use of something, or the employment of something in a manner contrary to the natural or legal rules for its use; the intentional destruction, diversion, manipulation, misapplication, maltreatment, or misuse of resources owned or operated by the locality: or extravagant or excessive use so as to abuse one's position or authority.

"Corruption" includes dishonest proceedings, bribery, debasement, alteration, or perversion of integrity. Corruption threatens equal access, quantity and quality of education.

Examples of Fraud, Waste, Abuse and Corruption (Not all-inclusive)

- Personal use of district-owned vehicles
- Long distance personal phone calls

14

- Personal use of district owned supplies or equipment
- Violations of system and/or state procurement policy
- Excessive or unnecessary purchases
- Falsification of official documents (timesheets, leave reports, travel vouchers, etc.)
- Contract fraud
- Serious abuse of time
- Inappropriate expenditures
- Embezzlement
- Theft or misuse of school funds or property
- Neglect of duty
- Bribery

Confidentiality

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

Procedures and Responsibilities

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

2. Each employee with the LMSD has the responsibility to report suspected fraud, waste, or abuse. All reports can be made in confidence.

3. The LMSD or its designees shall conduct investigations of employees, providers, contractors, or vendors against which reports of suspicious activity are made. All investigations shall be thorough and complete in nature and shall occur in a prompt manner after the report is received.

4. If necessary, the person reporting the fraudulent activity will be contacted for additional information.

5. A copy of these Fraud, Waste, Abuse and Corruption Administrative Procedures shall be posted on the LMSD's website.

Evaluation of Internal Controls Indicator D-3

LMSD will use the single audit to evaluate the internal controls of the district. LMSD contracts with an external auditor to conduct an annual audit of the district. LMSD will make changes to the internal controls based upon the recommendations and findings of the annual external auditor's evaluation.

Confidentiality Indicator E-2

As stated in LMSD's student and faculty handbook, "The Louisville Municipal School District adheres to the requirements outlined in the Family Education Right to Privacy Act (FERPA)." To this end, we will train all our

staff that deals with personally identifiable information to ensure the integrity and security of information at the beginning of the school year. This includes payroll, budgeting, personnel, etc.

Procedure to limit access to information system Indicator E-3 (revised 2/14/19)

The superintendent or his/her designee informs the director of technology who to authorize for access to the student information system (SAM). Limitations of access are applied based upon the roles which staff members possess. Automatic timeout after inactivity has been set at 15 minutes district wide to limit access to the student information system.

Methods for Retention of Records [200.334] Indicator E-4

Financial records, supporting documents, statistical records, and all other non-Federal entity records pertinent to a Federal award must be retained for a period of five years from the date of submission of the final expenditure report or, for Federal awards that are renewed quarterly or annually, from the date of the submission of the quarterly or annual financial report, respectively, as reported to the Federal awarding agency or pass-through entity in the case of a sub recipient. Federal awarding agencies and pass-through entities must not impose any other record retention requirements upon non-Federal entities. The only exceptions are the following:
- If any litigation, claim, or audit is started before the expiration of the 5-year period, the records must be retained until all litigation, claims, or audit findings involving the records have been resolved and final action taken.
- When the non-Federal entity is notified in writing by the Federal awarding agency, cognizant agency for audit, oversight agency for audit, cognizant agency for indirect costs, or pass-through entity to extend the retention period.
- Records for real property and equipment acquired with Federal funds must be retained for 5 years after final disposition.

All paper records for the grant will be boxed and stored at the end of the grant period after all funds have been expended. The records maintained will be those supporting the expenditures of federal funds including the paper work trail from requisition to check payment and the contractual process. When original records are electronic and cannot be altered, there is no need to create and retain paper copies. When original records are paper, electronic versions may be substituted by duplication or other forms of electronic media if they are subject to periodic quality control reviews, provide reasonable safeguards against alteration, and remain readable.

Collection, Transmission and Storage of Information [200.336] Indicator E-4

The LMSD will retain records for the federal awarding agency and should whenever practicable, collect, transmit, and store Federal award-related information in open and machine-readable formats rather than in closed formats or on paper. When paper copies are used, the Federal awarding agency or pass-through entity must always provide or accept paper versions of Federal award-related information to and from the District upon request. If paper copies are submitted, the Federal-awarding agency or pass-through entity must not require more than an original and two copies. When original records are paper, electronic versions may be substituted by duplication or reasonable safeguards against alteration, and remain readable. LMSD keeps all records in the basement of the central office building.

EQUIPMENT [200.313]
Management procedures: Fixed Assets/Inventory Requirements/Physical Inventory Reconciliation LMSD Policy DM, DO Indicators F-1, F-2, F-3, F-4, F-5, F-6, F-7, F-9

Equipment management database and inventory: F-1, F-2, F-3
A physical inventory of the property is taken, and the results are reconciled with the property records at least annually. LMSD performs a physical inventory count on a bi-annual basis.

Property records must contain information set forth in EDGAR 80.32(d)(1), which includes:
- A description of the property, a serial number or other identification number;
- The source of property (vendor);
- Who holds title;
- The acquisition date;
- Cost of the property;
- Percentage of Federal participation in the cost of the property;
- The location, use and condition of the property; and
- Any ultimate disposition data including the date of disposal and sale price of the property.

The LMSD maintains control of, holds title to, and administers equipment and property purchased with federal funds that are used to provide services to children in private schools.

Equipment and Real Property Management/Supplies/Procedures for Inventory Management: F-1, F-2, F-3
The school district uses the overall inventory listing as records for federal programs equipment. The reports include information such as location, asset tag number, description, brand, model, serial number, date acquired, original cost/estimated cost and replacement cost, source, who holds title, percentage of federal participation in the cost, condition of the inventory and disposition data. The district performs a physical inventory count on a bi-annual basis.

Supplies are tangible personal property that is not considered equipment. Generally, supplies are consumable and do not have excessive costs. As a result, supplies do not have to be recorded in an inventory management system, and do not require formal inventory. However, the LEA must maintain enough information about their purchases to prove all costs are necessary, reasonable, and allocable.

Control system to ensure safeguards against damage or theft: F-4
In addition, a control system is in place to ensure adequate safeguards to prevent loss, damage, or theft of the property. Any loss, damage or theft is investigated and the results are documented. Police reports are required for any item which has been stolen.

Maintenance of Equipment: F-5
The LMSD has developed and utilizes adequate maintenance procedures to keep property in good working condition. Technology work orders are entered into a task manager at the school level. If and when a piece of equipment needs maintenance, the appropriate department will determine if maintenance will be more cost effective than purchasing a new product with the same purpose. If maintenance is the more cost-effective option, the district will perform the maintenance if applicable. If maintenance cannot be performed by a district employee, outside sources may be asked for quotes for maintenance. If it is found to be more cost effective to perform maintenance, those cost can be charged to a federal grant if they keep property in

efficient operating condition, do not add to the permanent value of the property or appreciable prolong its recommended life; and are not otherwise included in rental fees or other charges for space.

Disposition of equipment: F-6
LMSD ensures that the disposition of equipment that is obsolete or no longer needed for the original program from which it was purchased by continuing to use the equipment in a Title I program based upon need.

Procedures for Disposal of Equipment: F-7
When an inventory item is determined to be obsolete, a recommendation is made to the board for disposal of the specific equipment. The board approves all disposals of equipment and approval is documented in the board minutes.

Procedures for Disposal of Equipment with a fair market value of >$5,000 F-8
When an inventory item with a fair market value of > $5,000 is determined to be obsolete, a recommendation is made to the board for disposal of the specific equipment. The board approves all disposals of equipment and approval is documented in the board minutes.

Use of Equipment

Acquisition and Use of Equipment: F-9
The Louisville Municipal School District may purchase equipment with federal funds providing they receive prior approval from MDE/OSE. Equipment is defined as an article of nonexpendable, tangible personal property having a useful life of more than one year and an acquisition cost that exceeds $1,000 per unit. In addition, "highly walk able" items with a useful life of one year or more are considered to be "equipment". Highly walk able items include, but are not limited to, laptops, iPads, audio-visual equipment, DVD players, think-pads, cameras, etc. Equipment purchased with Federal funds shall be used for the program or project for which it was acquired as long as needed, whether or not the project or program continues to be supported by Federal funds. [OMB Circular A-87 Attachment B]
The LMSD Federal Programs Director will approve the purchase of equipment with federal funds if the equipment is deemed essential to and for the benefit of the program from which funds are requested. Furthermore, the need for the purchase of equipment should be written in the school and or district-wide plan.

Purchase of Equipment Protocol: F-9
If equipment items are budged, the equipment being budgeted is required to be addressed in the MCAPS narrative.
- Equipment Item description
- Purpose of equipment (justification)
- Location (school name, office, etc.)
- Attach quote to Equipment Form

FIXED ASSETS POLICY

This policy shall comply with all policies and procedures listed in the Fixed Assets Policies and Procedures Manual and shall adhere to the codes set forth by the State of Mississippi, including but not limited to:

REQUIREMENTS
Each public school district is required by the Mississippi Office of the State Auditor to establish and maintain a system of accountability for its fixed assets. These requirements include:

- • Each district must tag all fixed assets.
- • Each district must maintain a detailed listing of fixed assets
- • Each district must take a physical inventory at least annually.
- • All deletions of fixed assets must be approved by the school board.

BOARD POLICY

Policy #	Description
DM	Fixed Assets Policy

GUIDELINES

Capitalized fixed assets are defined as assets (with a useful life of greater than one year) that have a historical cost of at least $1,000 and all assets (regardless of cost) that are considered highly walkable. The highly walkable items are:

Computers and computer equipment (greater than $250)
Cameras and camera equipment (greater that $250)
Televisions (greater than $250)
Cellular telephones
Two-way radio equipment
Weapons
Lawn maintenance equipment
Chain saws
Air compressors
Welding machines
Generators
Motorized vehicles

In other words, any item costing $1,000 or more automatically qualifies as a fixed asset. Any of the twelve items shown on the highly walkable list automatically qualifies as a fixed asset. This also applies to fixed assets (valued at their fair market value) that are donated to the school district. Upon the acceptance of any donated item considered a fixed asset, a Fixed Asset Donation letter must be submitted to the Central Office for School Board approval. Any fixed asset that is the personal property of an individual and not the property of the school district should be clearly labeled as such and not included as a district fixed asset.

All district owned land and buildings will be capitalized and recorded on the fixed assets inventory of the district. Infrastructure will not be capitalized as fixed assets.

When a fixed asset is purchased, a Fixed Asset New Item form must be completed and submitted to the Central Office. All fixed assets are to be tagged with "Property of Louisville Municipal School District" bar code tags. If, for any reason, a property tag is removed or damaged, submit a request to the Central Office for a replacement tag. Include the school location and the original fixed asset number. Use a permanent ink marker

to label the item with the asset number as well as "Property of LMSD" until the replacement property tag has been issued by the Central Office.

When an item is moved within a school or department, the fixed asset manager within the school or department must be notified. All room numbers and location codes must be kept accurate at all times. When an item is permanently transferred from one assigned location to another, a Fixed Asset Transfer form must be completed. If the transfer is temporary, the sending school or department should keep a Temporary Loan of Asset form on file until the fixed asset is returned.

Any fixed asset found to be beyond repair, lost, stolen, destroyed in a catastrophe or returned for credit must be submitted to the Central Office on a Fixed Asset Disposal form, signed and dated by the school principal or department head. A "lost or stolen property affidavit" must be prepared and signed. Items should be stored until approval has been granted from the School Board for them to be removed from inventory. It is only after the item has been approved by the board to be removed from inventory that you may dispose of the item. A copy of Board action, a copy of the approved disposal form and a copy of the "lost or stolen property affidavit" will be sent to the fixed asset manager once school board approval has been granted.

The responsibility for the physical custody of the fixed assets is assigned to the principal or department head. Any employee having custody and responsibility of any fixed asset will exercise due professional care in managing, maintaining and controlling the fixed asset. Employees will be required to complete and sign an inventory list of the assets in their possession. The original shall be posted in the employee's work area at the beginning of each school year. If the inventory changes during the year, corrections should be made using the transfer or disposal forms. A current inventory list should be on file at the end of the fiscal year reflecting the inventory at year end. If an employee is negligent in this duty, he/she may be held personally liable for fixed assets that are damaged or missing.

The Louisville Municipal School District performs inventory audits two (2) times per fiscal year. The first audit is in the fall and the second audit is performed in the spring before year end.

Cameras, camera equipment, computers, and computer equipment valued between $250 and $499 and purchased or received before July 1, 2008 will not be recorded on the fixed asset inventory of the district. Weapons, lawn maintenance equipment, chain saws, air compressors, welding machines, generators, and motorized vehicles valued between $1 and $499 and purchased or received before July 1, 2008 will not be recorded on the fixed asset inventory of the district.

All district owned land and buildings will be capitalized and recorded on the fixed assets inventory of the district.

Infrastructure will not be capitalized as fixed assets.

Depreciation:

Assets will be capitalized and depreciated as required by the State Auditor's Office.   Donated Assets: Assets which are donated to the School District will be recorded at the fair market value at the date of donation if $1,000 or more, and will be acknowledged by the School Board in the official minutes of the district.

Inventory:

The Finance Director or his or her designee is responsible for assigning tag numbers and recording fixed assets on the inventory.

The building level administrators will verify the inventory at least annually.

The building level administrators are responsible for notifying the Designated Fixed Assets manager of any transfers, disposals, donations, and /or other adjustments to fixed assets at their location.

All deletions from fixed assets shall receive Board approval.

Annual Inventory:

Annual Physical Inventory Policy - a physical inventory will be taken 2 times per fiscal year.

Accountability:

The building level administrators will accept responsibility for fixed assets at their location by signing a statement. They will also accept responsibility for tagging individual assets received at their location during the current fiscal year.

The building level administrators at their discretion may have the person in custody of the fixed assets accept responsibility by signing a statement. See the attached Fixed Asset Assurance Form.

If an item is found missing, the person who signed for being responsible for the item will be held personally and financially liable, unless a properly executed police report is filed in a timely manner.

PERSONNEL DOCUMENTATION [200.430] LMSD Policy DFCAA
Indicators G-1, G-2, G-3, G-4

All charges to Federal awards for salaries and wages must be based on records that accurately reflect the work performed. All staff must demonstrate allocability to the federal program through the maintenance of time and effort documentation indicating the specific federal program cost objective under which the employee works. Time and effort documentation must be maintained for all employees whose salaries are:
- Paid in whole or in part with federal funds (This includes stipends from professional development and after-school tutoring.),
- Used to meet a match/cost share requirement, and are
- NOT contractors.

All time and effort documentation will be signed by the appropriate supervisor with first-hand knowledge who can provide reasonable assurance the charges are accurate, allowable, and properly allocated. The documentation will reflect total activity for which the employee is compensated not to exceed 100%. Employees working under one cost objective will be listed on a semi-annual form, which will be signed by the principal and/or designated supervisor twice a year. The supervisor will submit to the FPD for record keeping. For those employees who are working under different cost objectives, the Personnel Activity Report (PAR) will reflect both federal and non-federal activities. Documentation will comply with established accounting policies and practices. Employees will complete the PAR monthly, sign, and submit to the supervisor on a

quarterly basis. The supervisor will sign and submit to the FPD who will maintain all time and effort sheets. Fringe benefits will be charged to the program will be reasonable and in compliance with requirements. The FPD will review the PAR reports quarterly and reconcile budgets such that the final amount charged to the Federal award is accurate, allowable, and properly allocated ***Disposition/Risk Assessment/ Control Activities***

PROCUREMENT PROCEDURES LMSD Policy DFCAA & DJED, Indicator H-1, H-2, H-3, H-4, H-5, H-6, H-7, H-8, H-9, H-10, H-11

Vendor Selection Process Indicator H-1, H-3, H-5, H-6, H-7, H-10, H-11

Louisville Municipal School District awards contracts only to responsible vendors and contractors possessing the ability to perform successfully as evidenced by contractor integrity, compliance with public policy, record of past performance, and financial and technical resources. To the extent practicable, purchases will be equitably distributed among qualified suppliers.

Suspension and Debarment [2CFR 180.300 and 2CFR 3485] Indicator H-1, H-3, H-5, H-6, H-7, H-10, H-11

Prior to accepting a bid or quote from a contractor or vendor the Business Manager will check to determine if the contractor or vendor has been suspended or debarred from doing business with an agency as it relates to federal funds. The following website is used to determine suspension or debarment.
System for Award Management (SAM): https://www.sam.gov/portal/SAM/#1

Documentation will be printed and kept on file with Federal Programs with regard to the status of a contractor or vendor. A search will be conducted for a new contractor or vendor prior to awarding the bid or quote.

Purchasing/Accounting

The following guidelines apply to district, federal, activity and agency fund purchases.

The law defines a "purchase" as the total amount of money encumbered by a single purchase order. The law also states it is unlawful to split purchases so as to appear to be authorized as purchases which do not require competitive bids.

Purchases in excess of $4,999.99: Two (2) written quotes must be obtained from two (2) independent vendors.

Purchases in excess of $75,000: Reverse auction bidding shall be the primary method for receiving bids during the bidding process for purchases over $75,000.

Electronic Bidding- House Bill 1106 revised Mississippi Code Section 31-7-13(c)(v) and requires local governmental entities to provide a "secure electronic interactive system for the submittal of bids requiring competitive bidding that shall be an additional bidding option for those bidders who choose to submit their bids electronically." The only exceptions to this requirement are for local governmental entities who are currently without available high-speed internet access and counties having a population of less than twenty thousand and municipalities having a population of less than ten thousand

The requirement for the receipt of electronic bids is effective January 1, 2018, and is applicable to procurements governed by Mississippi Code Section 31-7-13.

For more details, see "Memorandum Instructions for Use for Electronic Bidding Services, dated December 28, 2017. This information is available at www.dfa.state.ms.us.

Procurement

Purchases fall into the following categories:

- Micro-purchase-Goods (commodities) under $5,000 and services under $10,000. The purchase orders for micro purchases may be awarded without soliciting any competitive quotes if the costs are deemed reasonable. To the extent practicable, these purchases should be distributed equitably among qualified suppliers.
- All federal purchases of good (commodities) between $5,001 to $75,000 and services between $10,001 to $250,000 must have two (2) price quotes from qualified sources.
- Any purchase of goods (commodities) above $75,000 must adhere to House Bill 1109 which requires the completion of a sealed bid.
- Noncompetitive proposals – single source items. LMSD will not use single source item except in the following cases:
  - o The item is only available from a single source (This is extremely rare and documentation to support the search the search for other sources will need to be provided.);
  - o There is a public emergency that will not permit delay;
  - o MDE expressly authorizes noncompetitive proposals in response to a written request from LMSD;
  - o After soliciting a number of sources, competition is determined inadequate. (Documentation will need to be provided.)

GOODS (SUPPLIES/TECHNOLOGY/COMPUTER SOFTWARE/ETC.)
Indicator H-1, H-3, H-5, H-6, H-7, H-10, H-11

With respect to spending any federal dollars on items other than contractual obligations and personnel, the following procedures are necessary.

- Submit a purchase requisition to the Federal Programs office with all information completed at least one week prior to needing the purchase order. Under NO circumstance can items be obligated/purchased prior to receiving a purchase order signed by the Federal Programs Office. Items purchased without proper federal programs authorization cannot and will not be funded with federal dollars.
- For purchase of goods (commodities) between the amounts of $5,001 and $75,000, at least two signed and dated price or rate quotes must be attached. A cost benefit analysis should be done to support selected vendor, necessary if choosing the higher price vendor and must be board approved.
- Remember that ALL federal monies spent must be consistent with the following:
  - o The underlying needs of the program/needs assessment – related to an educational activity
  - o Included in the School wide Plan
  - o Consistent with federal cost principles
    - ▪ Allowable
    - ▪ Reasonable
    - ▪ Necessary

CONTRACTUAL – Indicator H-5, H-6, H-7

"Contract" means a mutually binding legal relationship obligating the seller to furnish the supplies or services and the buyer to pay for them. It includes all types of commitments that obligate the government to an expenditure of appropriated funds and that, except as otherwise authorized, are in writing.

Any time an individual agrees to come in to the school to provide any form of professional development or an identified service, a contract in necessary.

Louisville Municipal School District will award contracts only to responsible contractors possessing the ability to perform successfully as evidenced by contractor integrity, compliance with public policy, record of past performance, and financial and technical resources. [200.318(h)] LMSD will not restrict competition through the following:

- Unreasonable requirements on firms to qualify to do business;
- Requiring unnecessary experience or excessive bonding;
- Noncompetitive pricing practices;
- Noncompetitive awards to consultants on retainer;
- Organizational conflicts of interest;
- Specifying brand name instead of allowing "an equal";
- Any arbitrary action in the procurement process; or
- The imposition of state or local geographical preferences in the evaluation of the bids or proposal, except where applicable Federal statutes expressly mandate or encourage geographic preference.

With respect to spending any federal dollars on contracts and/or trainings with consultants, the following procedures must take place;

- Prior approval and confirmation of availability of funds must be obtained from the Superintendent and the Director of Federal Programs.
- The Federal Programs Director will be responsible for soliciting quotes and bids from a variety of vendors.
- If the anticipated cost is as follows:
  - Under $5,000 (micro-purchase) – Only one signed quote required. Micro-purchases must be distributed equitably among suppliers.
  - $5,001 to $75,000 for goods; $10,001 to $250,000 for services, at least two signed quotes are required. RFPs (Request for Proposals) will be used to solicit the quotes.
  - Over $250,000, RFPs (Request for Proposals) are required, and the formal sealed bid process is followed.
  - A contract must be written for all services.
- RFPs will include a clear and accurate description of the technical requirements for materials, products or services to be procured; and identify all requirements, which the vendors must fulfill, and all other factors to be used in evaluating bids or proposals.
- The principal and/or individuals requesting the contractual support will utilize rubrics based on the RFP to determine the selected vendor. A cost benefit analysis should be done to support selected vendor.
- The name of the selected vendor and all supporting documentation will be provided to the FPD who will share the information with the Superintendent. The FPD will submit the contract to the School Board for approval along with the committee notes, rubric and cost benefit analysis. The contract for services to be rendered should identify:
  - Clearly defined deliverables
  - Method of evaluation the district/school will use.
  - Description of services to be performed or goods to be delivered.

- o Scientific-based research to support the services to be provided.
    - o Description of dates when services will be performed or goods delivered.
    - o Description of location where services will be performed or goods delivered.
    - o Description of number of students/teachers to be serviced if applicable.
    - o Resumes for individual consultants are not required, but would provide auditors with additional information if contract was questioned.
    - o Be signed and dated.
- The Office of Federal Programs will create a requisition to be signed by the requesting principal/individual. A purchase order will be created and sent to the selected vendor by the Office of Federal Programs.
- After the purchase order has been processed, services may commence at the school.
- Under NO circumstances can services be performed PRIOR to a purchase order being authorized.
- Invoices will be paid after the services have been rendered.
- (Indicator: H-2)The LMSD Federal Programs Director will ensure to the greatest extent possible that all purchases avoid acquisition of unnecessary or duplicative items. LMSD Federal Programs Director will sign off on all requisitions prior to
- When placing a requisition, funds must be available in the proper object budget codes.
    - o 300 – 399 object code – Contracted services such as consultants, speakers, people who provide a service.

Avoidance of acquisition of unnecessary or duplicative items: Indicator H-2

The LMSD Federal Programs Director will ensure to the greatest extent possible that all purchases avoid acquisition of unnecessary or duplicative items. LMSD Federal Programs Director will sign off on all requisitions prior to a purchase being made.

- o Remember that ALL federal monies spent must be consistent with the following:
    - ▪ The underlying needs of the program/needs assessment – related to an educational activity.
    - ▪ Include in the School wide Plan.
    - ▪ Consistent with federal cost principles.
        - • Allowable, Reasonable, Necessary

Monitoring Services Provided – Indicator H-1, H-3, H-5, H-6, H-7, H-10, H-11

The FPD, or his designee, will monitor the work of contractors to ensure work is performed in accordance with the federal requirements and the federal application/plan. As a safeguard, all contractors that provide a service will supply the district with a written report of their work in our district. IF the contractor is not performing their duties as specified in the bid/agreement LMSD reserves the right to void the contract. Effectiveness of professional development will be evaluated through the use of Professional Development Evaluation surveys, the Comprehensive Needs Assessment and the effect the professional development had on the practice of teaching and student learning.

PROFESSIONAL DEVELOPMENT WITH FEDERAL PROGRAMS: Indicator H-1, H-3, H-5, H-6, H-7, H-10, H-11

Professional Development

Federal Programs funds may be used to provide training opportunities for teachers, assistant teachers and other professional staff. The following will be included in the project application narrative: specific information regarding the topics of training being provided, who the targeted audience is, who will provide the training, and how it will be paid. Funds may also be used for professional staff to attend training. Specific consultants or individual groups do not have to be specified.

Review and/or audit the content of procurement files: Indicator H-4

LMSD contracts with an external auditor annually to audit the contents and evaluate the completeness of LMSD's procurement files. The audit is conducted in accordance with auditing standards generally accepted in the United States of America and the standards applicable to financial audits contained in the *Government Auditing Standards,* issued by the Comptroller General of the United States.

Travel

The Louisville Municipal School District uses Federal funds for travel expenses only to the extent such costs are reasonable and necessary and do not exceed charges normally allowed by the LMSD in the regular operations consistent with the written travel policies. The LMSD follows the district's travel and per diem rules and costs when charging travel expenses to any federal grant.

Reimbursement Procedures

An invoice must be submitted to pay for the cost of the training. Subsistence, travel, or lodging must be submitted on a Travel Expense Report. The report requires documentation of the date, location, departing, location arriving, purpose of travel, number of miles, and expense.

The LMSD does not take Indirect Costs from Title I Part A, Title I-1003(a), Title II, Title IV, Title V

IF LMSD decides to take Indirect Costs the following procedures will be followed:

Direct vs. Indirect Costs [200.413(c)] Indicator I-1, I-2

Salaries of administrative and clerical staff are treated as indirect costs unless all of the following are met:
- Such services are integral to the activity
- Individuals can be specifically identified with the activity
- Such costs are explicitly included in the budget
- Costs are not also recovered in indirect

Indirect Cost Indicator I-1, I-2

Indirect costs are calculated from the utilities/electricity, phone/internet usage, copy machine usage, maintenance/technology, etc. This is determined by the Business Manager and given to the FPD. If the amount of indirect cost exceeds the need, then it will be returned to the federal grant it came from and will be redistributed appropriately.

- Upon MDE approval, the FPD will be responsible for ensuring funds are obligated and expended prior to the close of the grant period.

BUDGET CONTROLS
Indicators A-3, A-4, A-5, A-6, Q-1,K-1, K-2, J-1, J-2, J-3, J-4, J-5, J-6, J-7

Planning and Creation of Budgets: In the spring of every year the LMSD will enter into meaning consultation with each principal (public and private) to begin building the budget for the federal grant as applicable. This is in an effort to build a district budget, as well as, guard against any infringement of other accounting regulations (e.g. exceeding the procurement limits as a district for any one commodity or service). The LMSD will also engage parents through District Wide meetings and the Comprehensive Needs Assessment (CNA). The LMSD will also engage stakeholders through Federal Programs Committee Meetings.

LMSD determines the Title I school site allocations based on the current MDE formula provided in MCAPS. Set asides are taken off of the top of the allocation, as well as, the private school's equitable share. Then MCAPS determines the Per Pupil Allocation allotted each student. The federal programs director then determines the school's allocation and per pupil allocation based on school needs.

Responsibility for Managing Budgets: The responsibility for managing budgets falls under the Director of the department to whom the budget is assigned.

Loading and Tracking Budgets: Indicator A-4, A-5, A-6

 The Business Office is responsible for ensuring budgets are properly entered into the district's financial accounting software system Marathon. Upon receipt of the approved budget, the following steps are followed:
- The Business Office or its designee will enter the budget into the financial accounting software system.
- An expenditure budget will be printed and compared to the approved budget pages.
- The process for payment for approved expenditures is two-fold. Payment will be authorized upon the receipt of a requisition, purchase order, invoice **and** a receiving document.

Comparing Budgets to Expenditures [200.302(b)(5)] Indicator: A-4, A-5, A-6

- Budget should be compared to expenditures at least once every two months.
- Budget pages will be printed from the financial package Marathon by fund, by program code, and by unit code (school).
- The expenditure budget should be reviewed to ensure funds are being expended in a timely fashion.

- o If funds are not being spent in a timely fashion, the Federal Programs Director (FPD) should work with the school or party to whom the budget is directed and determine the steps that should be taken to expend the budget.
- o If funds are not going to be expended as originally planned, the FPD will need to follow the revision guidelines and write a revision for the use of the funds.
- o In the event the expenditure page reflects unallowable expenditures or overspent funds, the budget should be reviewed, and the appropriate steps taken to rectify the budget.
- o If the expenditure in not allowable, the FPD should work with the Business Manager to adjust the expenditures through journal adjustments to charge the appropriate budget.
- o If the expenditure is allowable but charged to the wrong account, the FPD will work with the Business Manager to make appropriate journal adjustments and correct the account number.
- o If the expenditure is allowable but the budget has been expended, the FPD will work with the Business Manager to make appropriate journal adjustments and/or write revisions to cover the expenditure.

## Process for Requesting Budget Revisions: Indicator: A-4, A-5, A-6

From Schools:
- The request will coincide with an entry into MCAPS to amend the school wide plan. The school wide plan revision should reflect how the request will address a weakness/need as indicated by data.
- The FPD will determine if the request fits the federal guidelines of reasonableness, allowability, and allocability.
- If the request is allowable, the FPD will be responsible for writing the revision.
- If the revision is approved by MDE, the FPD will work with the Business Office to make the necessary changes to the budget.

From District Office:
- Each grant period is identified through a general ledger code in the budget code.
- Budgets will be monitored by general ledger code to ensure the funds are expended within the grant period. (See procedures for Monitoring Budgets.)
- Within three months of a grant's obligation date, budgets will be closely examined. If it is identified the budget may not be expended during the period of availability and/or the school does not have plans or a need for the budget, the Federal Programs Director will write a revision to move the funds to another allowable budget area within the district.
- Upon MDE approval, the FPD will be responsible for ensuring funds are obligated and expended prior to the close of the grant period.

Cost Effectiveness and Sustainability: Indicators J-6

The following diagram shows the procedures used to evaluate the relative value received from different types of expenditures made using program funds.
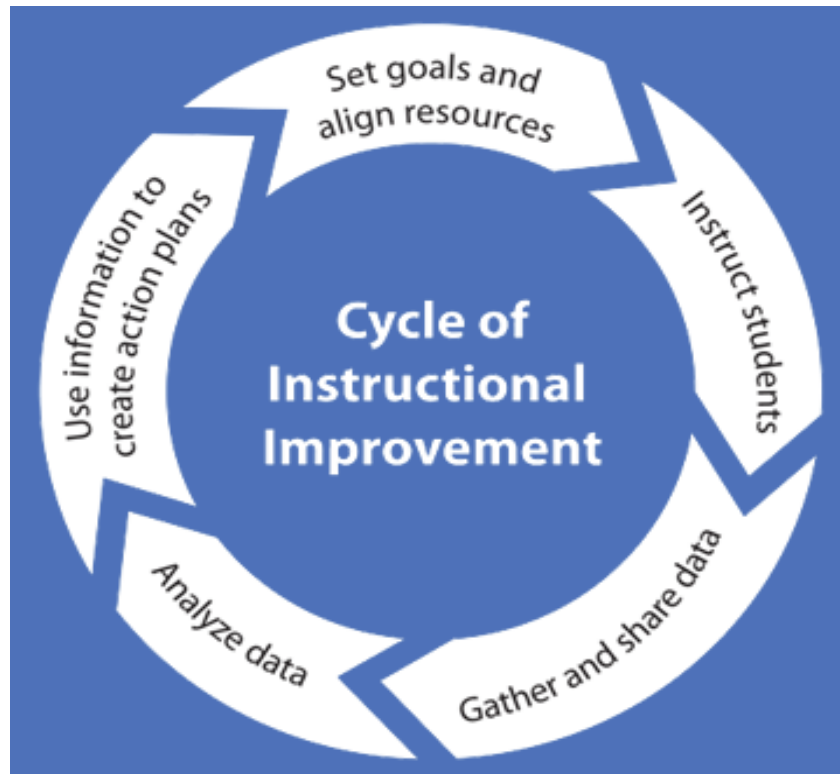
In order to determine the sustainability of the program activities and configure the program activities into decisions regarding the use of the program funds, the district follows the following procedures.

1. The LEA sets goals for the upcoming school year and aligns the best resources to assist in reaching these goals. These resources are made available to teachers, who have received training on their best use.
2. Students are introduced to the resources. A minimum of time with each resource is defined and students maintain the use of the resource for a structure time frame.
3. Data is constantly monitored to ensure students and teachers are using the material to the best learning advantage.
4. Data is analyzed continuously. Through this analysis, student growth can be evaluated. Copies of the analysis are distributed to principles, teachers, and administrators.
5. Using the information from the analysis, the program's sustainability can be easily determined. Programs that meet the LEA's set goals are sustained. Programs that fail to meet the expectations are re-evaluated which may lead to adjusting programs, adding to programs or deleting programs.

GENERAL GRANT MANAGEMENT, INDICATOR K-1

All federal grants follow the procedures as outlined herein. All grant budgets must be accepted by Louisville Municipal School Board prior to implementation and salaries identified in grants must be in conformance with the district salary schedule.

The following is a general reminder about the purpose of the different grants executed by the OFP. This office is not limited to the following grants but offers these as an example of the existing programs.

- Title I: The general purpose is to enhance the already existing educational program. Funds are used to supplement funds made available from non-federal sources.
- Title II: The general purpose is to enhance the already existing professional development program for administrators and teachers.
- Title IV: The general purpose is to provide a well-balanced educational experience, enhance safety and security, as well as, enhance use of technology. This grant is very specific as to what percentage of funds can be expended on each area of this grant.
- Title V: The Rural Education initiative is designed to address the unique needs of small, rural local education agencies (LEAs) that frequently lack the personnel and resources needed to compete effectively for Federal competitive grants and receive formula grant allocations under other programs in amounts too small to be effective in meeting their intended purposes.
- Impact Aid: Acts as a reimbursement program through the federal government for the district for students that live on federal property, have active-duty military parents or have parents that work on federal property. There are also other grants that are associated with Impact Aid through the Department of Defense in which the OFP routinely participates.

In general, a District Federal Programs Committee is convened at a minimum in spring of the year to plan for the needs of the district that are not already being met through local and state funds. This committee consists of parents, students, community members, teachers, staff and administrators. The purpose in the spring is to share data about the district and elicit feedback and form a plan for the district to craft into the application.

Determining site level allocation: Indicator K-2

Schools within LMSD are first ranked using strict poverty percentage within MCAPS. Higher per pupil allocations are used for the schools within the city limits of Louisville due to historically lower proficiency rates in English/Reading as well as Math. The LMSD Federal Programs Director bases the higher PPA on the results of the needs assessment conducted each spring. The LMSD Federal Programs Director will pull the poverty rates from the Community Eligibility Provision spreadsheet on the MDE website in March of each year.

Transferability

Transfers between funds are considered in the planning process of each year. This decision is weighed with the needs of the district at the time. Within MDE's application process for federal funds (MCAPS), the district will clearly outline their intentions to transferability prior to submission of the application annually.

EEF – Educational Enhancement Funds LMSD Policy DJEAB

EEF cards are administered through the Business Office. These funds are for supporting personnel by providing instructional supplies. Classroom supply money through EEF cannot be spent for administrative purposes and cannot be spent on any teacher that is federally funded.

Maintenance of Effort (MOE) Indicator L-1

The FPD and Business manager will work together to monitor MOE through the monthly draw down procedures. In these procedures, the budgets are sent from the Business Office to the OFP. The FPD then monitors the percentage of funds expended for each grant monthly. Appropriate action is taken to expend those grants in accordance with the plan that was created and federal guidelines. FPD will ensure that the schools and district spend the money that is budgeted in the appropriate line items and begin the process for any budget amendments if necessary. If the district fails to meet MOE the FPD will meet with the principals of the schools that did not spend the money that they were allotted and take appropriate measures to ensure the funds will be spent as requested. Business Manager will also use the formula to calculate MOE that is available through the Office of School Finance at MDE to ensure that the calculation is correct. MOE will be calculated two times a year by the Business Manager.

Comparability Indicator M-1, M-2

Demonstrating comparability is a prerequisite for receiving Title I, Part A funds. Because Part A allocations are made annually, comparability is an annual requirement. The local education agency (LEA) must develop written procedures for complying with the comparability of services requirement and implement those procedures annually. The comparability report is submitted annually to the Mississippi Department of Education (MDE), Office of Federal Programs. The comparability requirement does not apply if the LEA has only one building in each grade span. The LEA may also exclude schools with one hundred or fewer students from its comparability determinations. The certifying official must be a district administrator whose salary is not paid by Title I.

Comparability Compliance

It is the joint responsibility of the Office of Federal Programs and the Assistant Superintendent's Office to ensure that Louisville Municipal School District (LEA) remains in compliance with the comparability requirement set forth in ESEA Section 1120A (c). To be eligible to receive Title I funds the LEA must use state and local funds to provide services in Title I schools that are at least comparable to services provided in non-Title I schools. If the LEA serves all its schools with Title I funds within a particular grade span, the LEA must use state and local funds to provide services that are substantially comparable in each school. Comparison of student/staff ratios for state and locally funded instructional staff, FTE in each Title I school with the average of student teacher ratios for state and locally funded instructional staff in Title I comparison schools by grade span. A Title I school is deemed comparable if its student/staff ratio does not exceed 110 percent of the average student/staff ratio non-Title I schools or Title I comparison schools. MSIS reporting data from Month 1 will be used to determine instructional staff and FTE.

Deadlines

The LEA shall perform the comparability calculations annually. It is essential that the calculations be made as close to the beginning of the school year as possible, but in no event later than the first Friday in November to allow for any necessary reallocation of resources with minimum disruption to students should any school is found not is receiving comparable services. When submitting the comparability report to MDE annually, the LEA will follow the MDE deadline for reporting. The comparability report along

with all required forms must be uploaded into MCAPS LEA document library current year's comparability folder by the required deadline.

Determining Schools to be Included

The Federal Programs office will determine which public schools that are a part of the LEA, are to be included in making comparability calculations. When calculating Refer to the MDE Comparability Handbook for Title I schools for additional details regarding schools to be included and the USDE Non-Regulatory Guidance, Title I Fiscal Issues.

Procedure for determining comparability: Indicator M-1

The LMSD will use Grade Span using Instructional Staff Full-Time Equivalency to determine Comparability. Comparison of student/staff ratios for state and locally funded instructional staff, FTE in each Title I school with the average of student teacher ratios for state and locally funded instructional staff in Title I comparison schools by grade span. A Title I school is deemed comparable if its student/staff ratio does not exceed 110 percent of the average student/staff ratio non-Title I schools or Title I comparison schools. MSIS reporting data from Month 1 will be used to determine instructional staff and FTE. Instructional staff comparability will be established using the MDE Form(s) online template (Non-Title I/Title I Comparison Schools to Title I Schools using Instructional Staff FTE and the Comparability Report School Informational List). Instructional staff includes all licensed instructional personnel assigned by schedule to the school,
whether full or part time. Instructional personnel include all licensed classroom teachers and other licensed personnel assigned to the school who provides services that support instruction: principals, assistant principals, instructional coaches, librarians, music, art, and physical education teachers, guidance counselors, speech therapists, and licensed social workers and psychological personnel. Pre-K personnel or 100% federally funded personnel may not be included in count.

Reallocation

If the calculation indicates that a school is not receiving comparable services, notify the Superintendent immediately. The LEA will then take immediate steps to reallocate resources as early in the school year as possible and with minimum disruption to the learning environment. If any Title I school is not comparable, then the LEA must adjust school resources to achieve comparability in the same school year. Appropriate steps may include, but are not limited to, reallocation of materials or supplies, or reassignment of personnel.

- If the school district is unable to demonstrate comparability using either method given, the Superintendent will be alerted immediately, and resources will be moved to allow the school(s) to be comparable as soon as possible but no later than the deadline given by MDE. Once this is completed, comparability will be run again using the new information and submitted back to MDE.
- If adjustments are made to demonstrate comparability, the LEA must revise the comparability report, upload the new report and a letter stating what adjustments were made. Documents must be uploaded to MCAPS by MDE deadline.

Complaints

All complaints regarding schools not receiving comparable services will be handled by the Office of Federal Programs and/or Assistant Superintendent's Office.

Records

The Federal Programs office must ensure that all comparability records and source documentation demonstrating the methods and results of the LEA's comparability analysis are retained for five years for audit purposes. The LEA will maintain up-to-date records of having established and implemented an agency-wide salary schedule, a policy to ensure equivalence among schools in teachers, administrators, and other staff, and a policy to ensure equivalence among schools in the provision of curriculum materials and supplies.

The Office of Federal Programs will keep all records of Comparability for at least ten years.

The Federal Programs Director in the Office of Federal Programs will be responsible for handling complaints that a school is not receiving comparable services.

Class Size Reduction

Beginning in the 2017-2018 school year, LMSD no longer employs Class Size Reduction as a method to boost student achievement. MDE pointed out there is no recent survey to prove this is an effective method to raising student achievement, so the decision was made to cut this particular program.

Actual Data, Indicator O-1, M-1, M-2

The LEA must use actual and reliable data from schools to make the calculation. Student enrollment and instructional staff full-time equivalent (FTE) data used to compute comparability are collected the last week of September, no later than September 30th.

The documents needed, such as staff listings, staff schedules, instructional staff FTE documentation/spreadsheets, building resource schedules, enrollment data, payroll records, and poverty factor from Consolidated Title I application will be collected.

The LEA will use the MSIS school staff list, Title I/IDEA funded lists and certified/non-certified list from the schools. LEA will use the student numbers from MSIS for the month of September.

The LEA should include in their written comparability procedures how the LEA will determine which instructional staff and/or the instructional supplies and materials to be used in comparability calculations. For example, the LEA that uses the pupil-teacher ratio option procedures should specify or define instructional staff (excluding federally-funded staff) to be used in comparability calculations. The LEA should consistently include the categories of staff members in the ratios for both Title I and the comparison schools. Instructional staff includes all licensed instructional personnel assigned by schedule to the school, whether full or part time. Instructional personnel include all licensed classroom teachers and other licensed personnel assigned to the school who provides services that support instruction: principals, assistant principals, instructional coaches, librarians, music, art, and physical education teachers, guidance counselors, speech therapists, and licensed social workers and psychological personnel. Pre-K personnel or 100% federally funded personnel may not be included in count.

Whether paraprofessionals are included in comparability determination depends on procedures the LEA has developed. Consistent with the requirement in Title I that a paraprofessional supported with Title I funds may only provide instructional support under the direct supervision of a teacher, an LEA should consider carefully whether a paraprofessional supported with state and local funds should be considered as an instructional staff member in comparability determinations. IF the LEA determines to include paraprofessionals, paraprofessionals who assist in the instruction of students should only be counted as half of a full-time equivalency (.5FTE). In addition, an LEA should take care not to include paraprofessionals not involved in providing instructional support in its comparability determinations.

- LMSD will use the pupil-teacher ratio option first including instructional staff only in comparability calculations; excluding all federally paid personnel (Title I, Title II, IDEA). If that does not prove comparability, then the method of comparing salaries will be used.

- Excluded staff should include staffs paid from private funds and those that do not provide direct instructional services. Staff to be excluded are special education teachers and assistant teachers (if IDEA funded), EL assistants (paid with federal funds), social workers (federally funded), Cafeteria workers, Custodians, nurses, student teachers, administrative interns, tutors, Instructional Literacy Coaches (federally funded), and short-term substitutes and/or volunteers.
- Included staff should include staff paid from district/state funds and positions that provide direct instructional services
- Instructional staff to be included: classroom teachers, long term substitutes, assistant teachers, district/state funded special education teachers, district/state funded EL teachers or assistants, district/state funded social workers, district/state funded instructional literacy coaches, district/state funded speech teachers, gifted teachers, PE teachers, PE assistants, behavior modification teachers, behavior modification assistants and any other applicable district/state positions.

EQUITABLE SERVICES TO PRIVATE SCHOOLS: INDICATORS N-1, N-2, N-3, N-4

LMSD engages in meaningful consultation with public and private schools in an ongoing fashion throughout the school year. LMSD has no less than one annual meeting of private school leaders and the FPD will also visit each private school campus no less than one time per fiscal year. LMSD strives to treat all private school officials with the utmost courtesy and respect. Each child that is in a private school is a member of the LMSD community and their education is of utmost importance even if it is conducted by a private organization. The families that choose to send their students to private schools are members of our community and their confidentiality and feedback will be honored. To that end, LMSD realizes that ongoing communication with private school officials is paramount in continuing a "workable" relationship. Emails, phone calls and "drop by" (central office) visits are welcomed and encouraged. Complaint process – The Complaint Policy is detailed out in a document available on the district's website. It basically says that private schools can launch a complaint with the district or state regarding the way the district handles their programmatic of fiscal issues. Of course, any issues or concerns will be addressed as soon as they arise; however, if an issue is in debate the state Ombudsman can be called upon to help solve any dispute.

Equitable services for private schools are calculated based upon the formulas in the MCAPS application. Any equipment purchased for a private school is maintained by LMSD through appropriate inventory "tagging" and auditing. Any maintenance needed to equipment must be provided by LMSD. Any installation of technology must be done by LMSD. Private schools are asked to not seek an outside vendor for any installation of maintenance that needs to be done to equipment or supplies. All purchases by private schools go through the Marathon system. The requests come to the OFP's bookkeeper and she then enters the requisition into Marathon. The FPD then approves or denies that requisition as appropriate.

Data Quality Indicator: O-1, O-2, O-3, O-4

The people that work in our district and schools have to meet multiple deadlines during the year, and these deadlines often fall on the same date. Every school has to contend with those times of the year when there is a spike in the data requirements. It is important for everyone who works with the data to participate in determining the calendar. This includes the technology department and the data clerks. It is important for the

district to control the workflow and to make sure that the entire staff knows what is expected during the school year.

Therefore, the district has developed a calendar of due dates and timelines that will provide the necessary information.

The Data Timeline and Calendar must indicate due dates for reports, due dates for data entry, designated holidays, designated days or weeks set aside for testing, and identify the staff person responsible for implementation.

The data entry and reporting calendar will be helpful to the school's technology staff. The calendar should allow staff to know when to expect a greater use of the computer systems for data entry. This alerts them to scheduled server maintenance before or after times of peak activity, and to augment help desk personnel to meet increased needs.

The district will provide sufficient time and resources for data collection so that staff has time and takes responsibility for data collection.

Office Staff

Office staff is responsible for entering important data accurately and completely, maintaining data security, and understanding how the data will be used. The district recognizes that this position is at the center of its data collection effort. Therefore, it is important that this position is taken seriously and given the resources so that they can work more efficiently. Moreover, in return, their data entry task will be easier and less frustrating.

Responsibilities
- Enter data accurately and in a timely manner.
- Attend professional development training.
- Follow appropriate instructions and documentation.
- Identify barriers to effective data entry procedures and communicate these to the principal, or other appropriate personnel.
- Implement the district data security policies and procedures (e.g., change passwords frequently, do not share passwords, treat data confidentially, etc.)
- Check your work and run appropriate edit reports.
- Ask for help when you make an error.
- Identify a peer who does work similar to yours so that you can share ideas and best practices.
Check your calendar for data reporting deadlines so that you can set aside time for

MSIS Primary Contact

You serve your administrator by ensuring that the statistical information reviewed by senior staff represents data that has been entered accurately and collected systematically. Furthermore, you enhance the information reporting process through staff development and collaboration with the various offices and programs responsible for producing data and information.

Responsibilities
- Coordinate the data collection process.
- Provide professional development for staff members.

- These sessions might include
  - o Demonstrations that incorporate hands-on training, enabling data entry personnel to become used to the actual data entry screens; examples that actually reflect situations that will be encountered; handbooks or guidebooks, with copies of data entry screens, systematic instructions, and the rationale for entering the data; descriptions of the procedures for obtaining assistance (e.g., help desk phone number, online and/or e-mail query process); and, copies of the reports created from the data, enabling trainees who enter information to have a sense of how their work affects the operation of the school.
- Resolve discrepancies in information before reports are forwarded to senior staff.
- Develop a process that allows staff to request new reports or modifications of existing reports.
- Collaborate with the District Technology Director or Coordinator to enhance the ability of computer programs to determine effective editing procedures for reports and other information.

Process Steps

Prepare Student Database Package and MSIS Data for New Year
- Perform MSIS Rollover. In MSIS, students are transferred from feeder schools to schools they will be attending during the upcoming year. This is done using the MSIS school transfer screen and eliminates the need to perform individual release and transfers for each student moving from one district school to the next grade at another.
- Perform SAMS SPECTRA Rollover. This rollover is performed at each school. This is done to promote students to the next grade.
- Enter pre registered kindergarten students and new student summer enrollments in SAMS SPECTRA package at school level. Student demographic, guardian, and emergency data are entered.
- Students are assigned Home Rooms.
- Students are given schedules.

School Begins
- Entry dates are generated for all students. This will give all students an original entry code (E1) with the date of the beginning day of school.
- MSIS Initial Load is performed for kindergarten students. This procedure generates a file that is transmitted to MSIS that contains all the data MSIS needs to assign a MSIS Id for the Kindergarten students. These MSIS Ids are downloaded from MSIS and imported in each kindergarten's SAMS SPECTRA package.
- Verify Students. Verification rosters or home room summaries are printed and verified by classroom teachers. This helps eliminate scheduling errors.
- Attendance entered daily.
- Discipline entered daily.
- Student Database is backed up daily.

Monthly files are sent to MSIS at the end of each register month.
- Days taught files are generated at the school. These files are uploaded to MSIS to be used during the monthly transmit.
- Monthly student files are generated at the school. These files are uploaded to MSIS for processing.

- Errors, if exist, are corrected. After the files are processed by MSIS, results files are generated. If the files submitted to MSIS contain no errors, Success result files are received. If errors are found during MSIS processing, Failure result files are received. These files contain error descriptions. These errors are reviewed by the school. Once these corrections are made at the school level, the SAMS SPECTRA data is transmitted for rebuilding, and resubmitting of monthly student file. This process is repeated until successes are received for all schools.

MSIS pre-approved reports are generated.
- Pre-approved reports are generated at the central office for each school.
- Schools are contacted and review the pre-approved report with central office staff.
- If errors exist in enrollment or average daily attendance numbers, sources of the problems are identified and corrected and the process returns to Step 4.

MSIS files are approved and monthly reports are generated by the tenth day of the month.
- All MSIS School files are approved.
- MSIS District file is approved.
- Monthly reports are generated for each school.
- The entire process must be completed by the 10th day of the month.

Passwords

MSIS and SAMS SPECTRA student database passwords are set by each user. MSIS password polices are enforced by the Mississippi Department of Education. SAMS SPECTRA passwords are changed frequently by users. Passwords are not shared.

Storage/ Backup

All live data is stored on Novell file servers located in each school office. This data is backed up to hard drives of workstations on each network daily. These backups are transmitted offsite electronically to the central office. Data backups are created on CDs and stored at the central office. Previous year's student data can be rebuilt and accessed at the central office when needed.

Physical Infrastructure

All servers are located inside each school's office. These servers are either located in internal office closets or offices out of the reach of students and visitors. Workstations are located on the desk in the offices of office staff. This location prevents contact by students or visitors.

Data Collection Systems Security and Maintenance

Computer workstations are protected with network and windows passwords, as well as screen saver passwords. This combination of passwords prevents unauthorized access of office staff computers.

The Federal Programs Director will check MSIS prior to submission to certify that all homeless, EL, and Foster Care data is correct.

General Fiscal Requirements Indicators: P-1, P-2, P-3
Request for Funds

The school district or agency will be notified via the Funding Alert of the actual allocation and of the authority to expend funds for federal grants. As in the past, the original project applications are based on a projected allocation; therefore, Request for Funds will be approved following an amendment to the actual allocation.

- Usually, all districts will receive 85% of their federal grants initially. The remainder will be awarded after the State's receipt of its total allocation and/or when all outstanding forms and backup documentation have been received from the district.
- Requests for Funds should be submitted to the Accounts Payable/School Office. Office of Accounting/MDE transfers will be sent to the district's bank account (3) working days prior to the end of the month. The Office of Accounting will utilize the First-In-First-Out (FIFO) payment method.
- It is important to obligate any balance remaining for the expiring grants by September 30th of each year.
- Federal grants typically run for 27 months:
    - 1st 12 months 85% of the grant should be encumbered or expended.
    - Next 12 months the additional 15% of the grant should be encumbered or expended.
    - During the final three months, the grant is in liquidation and all monies should be expended at this time.

Responsibility for Managing Budgets: The responsibility for managing budgets falls under the Director of the department to whom the budget is assigned.

Loading and Tracking Budgets: The Business Office is responsible for ensuring budgets are properly entered into the district's financial accounting software system Marathon. Upon receipt of the approved budget, the following steps are followed:

- The Business Office or its designee will enter the budget into the financial accounting software system.
- An expenditure budget will be printed and compared to the approved budget pages.
- The process for payment for approved expenditures is two-fold. Payment will be authorized upon the receipt of a requisition, purchase order, invoice **and** a receiving document.

Comparing Budgets to Expenditures [200.302(b) (5)]

- Budget should be compared to expenditures at least once every two months.
- Budget pages will be printed from the financial package Marathon by fund, by program code, and by unit code (school).
- The expenditure budget should be reviewed to ensure funds are being expended in a timely fashion.
    - If funds are not being spent in a timely fashion, the Federal Programs Director (FPD) should work with the school or party to whom the budget is directed and determine the steps that should be taken to expend the budget.
    - If funds are not going to be expended as originally planned, the FPD will need to follow the revision guidelines and write a revision for the use of the funds.
    - In the event the expenditure page reflects unallowable expenditures or overspent funds, the budget should be reviewed, and the appropriate steps taken to rectify the budget.
    - If the expenditure in not allowable, the FPD should work with the Business Manager to adjust the expenditures through journal adjustments to charge the appropriate budget.
    - If the expenditure is allowable but charged to the wrong account, the FPD will work with the Business Manager to make appropriate journal adjustments and correct the account number.

o If the expenditure is allowable but the budget has been expended, the FPD will work with the Business Manager to make appropriate journal adjustments and/or write revisions to cover the expenditure.

Process for Requesting Budget Revisions:

From Schools:

- The request will coincide with an entry into MCAPS to amend the school wide plan. The school wide plan revision should reflect how the request will address a weakness/need as indicated by data.
- The FPD will determine if the request fits the federal guidelines of reasonableness, allowability, and allocability.
- If the request is allowable, the FPD will be responsible for writing the revision.
- If the revision is approved by MDE, the FPD will work with the Business Office to make the necessary changes to the budget.

From District Office:

- Each grant period is identified through a general ledger code in the budget code.
- Budgets will be monitored by general ledger code to ensure the funds are expended within the grant period. (See procedures for Monitoring Budgets.)
- Within three months of a grant's obligation date, budgets will be closely examined. If it is identified the budget may not be expended during the period of availability and/or the school does not have plans or a need for the budget, the Federal Programs Director will write a revision to move the funds to another allowable budget area within the district.
- Upon MDE approval, the FPD will be responsible for ensuring funds are obligated and expended prior to the close of the grant period.

CONFLICT OF INTEREST [200.318(c)(1)] LMSD Policy BHA, CED, CGD, CP, GAAC, GAG

Louisville Municipal School District maintains a written standard of conduct including conflict of interest policies found in Board polices BHA, CED, CGD, CP, GAAC, and GAG. Board Policy GAG includes the following:

It shall be unlawful for any member of the Board of Trustees of any school district, any member of the county board of education, the county Superintendent of Schools or any superintendent, principal, teacher, or employee of a county board of education or any school district to have or own any direct or indirect interest individually or as agent or employee of any person, partnership, firm, or corporation in any contract made or let by the county board of education, the county Superintendent of Schools or the Board of Trustees of the school district for the construction, repair, or improvement of any school facility, the furnishing of any supplies, materials, or other articles, the doing of any public works or the transportation of children or upon any subcontract arising therefore or connected therewith in any manner.

Enrollment of EL/Immigrant students Indicator: NN-1

Registration Procedures

Guidelines for Registration

1. Proof of Age – A valid birth certificate, a valid passport, or other official document listing date and place of birth. Birth certificate is not "required." Other documentation of birth date must be accepted in the absence of a valid birth certificate.
2. Registration Forms – School registration forms are to be completed and filed at the school.
3. Home Language Survey Form – District-wide form to be completed and signed by the parents of ALL NEW STUDENTS registering for grades K-12. A Social Security Card is NOT necessary for enrollment for school lunch forms. If the student does not have a social security card, the school will assign a number. Former school records, report cards, and/or transcripts are requested of the parents or guardians. If not available, information relating to the former school will be obtained in order to request these documents.

Identification of Potential ELL Students

An ELL student shall be defined as a student who:

A. was not born in the United States or whose native language is a language other than English and comes from an environment where a language other than English is dominant; or

B. is a Native American or Alaskan native or who is a native resident of the Outlying areas and comes from an environment where a language other than English has had a significant impact on such individual's level of English language proficiency; or

C. is migratory and whose first language is other than English and comes from an environment where a language other than English is dominant; or

D. has sufficient difficulty speaking, reading, writing, or understanding the English language and whose difficulties may deny such individual the opportunity to learn successfully in classrooms where the language of instruction is English or to participate fully in our society.

Louisville Municipal School District identifies ELL students by means of a Home Language Survey (HLS) at the time of registration. The person responsible for registering the student (secretary, counselor, or data entry person) submits the completed Home Language Survey from for potential ELL students to the school's counselor at the time of registration (see Appendix A).

If any response on the HLS indicates the use of a primary language other than English, by the student or an individual in the home, further assessment must be conducted to determine the student's English language proficiency level. However, the presence of a language other than English does not automatically signify that the student is not a competent and proficient speaker of English. Students are identified as ELL when their composite score in the domains of listening, speaking, reading, writing, or comprehension are considered ELL. (Mississippi Guidelines for English Language Learners: Policies, Procedures and Assessments)

The school counselor/district ELL coordinator (or the principal's designee) formally assesses the student for English language proficiency using the state mandated LasLinks assessment placement test. The student's schedule and related services are made based on the language assessment results. Copies of all data/information concerning the ELL will be forwarded to the Office of Curriculum and Assessment and Federal Programs Department.