

Southwest Georgia S.T.E.M. Charter Federal Programs Procedural and Internal Controls Handbook

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Southwest Georgia S.T.E.M. Charter (SGSC) Federal Program Monitoring

NOTE: THIS ENTIRE DOCUMENT DESCRIBES THE REQUIREMENTS FOR THE Southwest Georgia S.T.E.M. Charter TITLE I AND ALL FEDERAL PROGRAMS

The information included in this document is pertinent to the following Federal Programs. Programs for which Southwest Georgia S.T.E.M. Charter receives funds are **bold italics**:

- ***Title I Part A*** (CFDA 84.010)- State Program Code 1750
- Title I Part A Academic Achievement Awards (CFDA 84.010)-State Program Code 1752
- Title I School Improvement 1003(a) (CFDA 84.010)-State Program Code 1770
- Title I, Part A Reward Districts Awards (CFDA 84.010)-State Program Code 1753
- Title I, Part D Neglected and Delinquent (CFDA 84.010)-State Program Code 1755
- Title I, Part C Migrant (CFDA 84.011)-State Program Code 1762
- ***Title II, Part A Teacher Quality*** (CFDA 84.367)-State Program Code 1784
- Title III, Part A Language Instruction for LEP and Immigrant Students (CFDA 84.365A)-State Program Codes 1811 and 1816
- ***Title IV, Part A Student Support and Academic Enrichment***
- Title X Part C McKinney-Vento Ed. For Homeless Children and Youth (CFDA 84.196)-State Program Code 1800
- Title VI, Part B Rural Education Achievement Program (REAP) (CFDA 84.358)-State Program Code 1847
- School Improvement 1003(g) (SIG) (CFDA 84.377)-State Program Code 1777
- Title IV, Part B: 21st Century Community Learning Centers
- ***Title VI-B IDEA Flow through***
- ***Grant-Section 611of IDEA***
- ***IDEA Preschool Grant-Section 619 of the IDEA 2004***

PURPOSE OF FEDERAL PROGRAMS HANDBOOK

The purpose of this procedural handbook is to provide a step-by-step, systematic approach to managing the rules and guidelines of Federal Programs to ensure consistent compliance. The information provided may be used by staff to ensure that Federal Programs are being implemented accurately and effectively.

The step-by-step approach contained in this handbook will promote uniformity in operations as Federal Programs personnel seek to carry out official duties and responsibilities. The Georgia Department of Education (GA DOE) provides local educational agencies (LEAs) extensive guidance on the over-arching requirements for Federal Programs. These specific requirements from the GA DOE document were used to create this handbook. Step-by-step procedures, local and state Board policies, and checklists are all included in this guide.

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OVERVIEW OF TITLE I PART A OF ESEA

In 1965, the Congress of the United States passed the Elementary and Secondary Education Act (ESEA) to provide supplemental instructional services to schools where the resident population has a higher than average concentration of low income students. The goal of Title I ESEA is to provide supplemental instruction in the core academic subject areas of reading, language arts, math, science, and social studies to educationally disadvantaged students attending schools that qualify for funding. Educationally disadvantaged students are those who are falling behind their age mates in reading, language arts, math, science, and/or social studies. It ensures the same high standards for all children and provides funds to supplement the educational standards of the state and local school district.

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

The Georgia Department of Education requires that Southwest Georgia S.T.E.M. Charter monitors the implementation of Title I programs and the expenditure of all funds associated with the program. The specific requirements are as follows:

The Federal Program Director will conduct self-monitoring of its schools and programs sufficient to ensure compliance with Title Program requirements, including Title I, Part A, Title II, Part A, Title III, Title IV-A, McKinney Vento Act, and the Individuals with Disabilities Act (IDEA).

Federal Program Director will undergo training from GaDOE and other sources to maintain proficiency in all Federal Program compliance requirements.

Federal Program Director will provide technical assistance to local schools.

Federal Program Director's self-monitoring will include monitoring all program expenditures to verify that all program expenditures comply with Title I Program requirements.

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

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

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

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

Monitoring is an essential component of ensuring that all facets of the Title I program are being implemented as prescribed by No Child Left Behind under the Elementary and Secondary Act. It is a process of systematically providing technical assistance and collecting data in order to provide information that can guide program implementation. The Southwest Georgia S.T.E.M. Charter Title I Program makes use of monitoring as a means of regular observation and recording of activities taking place in Title I schools. Critical to this process is the feedback provided to schools that can assist in improving student academic achievement. System level monitoring addresses the following:

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

The Elementary and Secondary Education Act requires the State educational agency (SEA) to monitor the implementation of program requirements and the expenditure of federal funds. Monitoring by the Georgia Department of Education (GaDOE) consists of four major components:

1. Monitoring of Expenditures – Local educational agencies (LEAs) must submit for approval an annual budget through the Consolidated Application process. GA DOE Federal Program Specialists review each application and budget to ensure that expenditures are appropriate for the program area before approving LEA budgets. Once budgets are approved, GA DOE Federal Program Specialists track how well LEAs are requesting funds for expenditures to ensure that LEAs are likely to meet the expenditure requirements for all federal program funds.
2. Single Audit – LEAs with single audit findings are flagged for technical assistance.

3. On-site Monitoring – A SEA on-site Cross-Functional Monitoring Team visits a LEA to apply the criteria included in the *LEA Monitoring Form*.
4. Self-Monitoring Checklist – LEAs not receiving an on-site visit complete the Self-Assessment Checklist and submit it to the Georgia Department of Education (GaDOE).

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

- Selection of LEAs to be monitored.
- LEAs are monitored on a four-year cycle. Approximately one-fourth of the LEAs are monitored each year.
- LEAs were initially randomly selected from each of Georgia's program service areas.
- LEAs with audit or monitoring findings requiring a return of monies, or receiving a high number of complaints from parents and other stakeholders are monitored within the year of the LEA audit or monitoring report and the written complaint.
- On-site monitoring outside of the scheduled cycle may be arranged as needed if an LEA evidences serious or chronic compliance problems.
- Title I Education Program Specialists must follow the Division protocol when conducting an on-site monitoring of an LEA. A copy of all documentation is maintained with the SEA.

Section 1: LEA COMMUNICATION WITH AND MONITORING OF TITLE I SCHOOLS

Monitoring of Title I schools is a critical component of ensuring that compliance is taking place at each school. During the summer prior to the beginning of the new school year and after the Annual Title I Conference in June, the District Federal Programs Director convenes a meeting with the Superintendent/Principal during the summer. Administration receives training on policies and procedures and guidance for operating federal programs. Administration is given detailed information on expectations and copies of program guidance. Specific training is provided in all facets Federal Programs. Information provided includes timelines, budget forms, inventory information, schoolwide implementation, parental involvement, waste, fraud, and abuse policy and other areas of Title I as appropriate. Meetings are also held with Superintendent/Principal as needed to ensure guidelines and deadlines are being met. Specific budget information is given out at these meetings. The Federal Programs Director's office is located in our one school building. Guidance and deadlines are discussed daily/weekly and through emails between the director, principal, and superintendent. All Title I services are supplemental. This process is monitored through on-going technical assistance, meetings, and through the budgeting process.

ONSITE MONITORING PROCEDURES

All Title I schools are subjected to on-going monitoring by the Federal Programs Director throughout the school year. The Federal Programs Director's office is located within the one school building. The Federal Programs Director works with the administration, teachers, and staff, on an on-going basis, to ensure compliance with Federal Programs guidelines is being met. Feedback will be provided to administration via checklists and descriptive information. In addition, emails, face-to-face meetings, and phone conversations take place throughout the year as a means of providing on-going monitoring and communication with the principal and superintendent.

TIMELINE FOR MONITORING TITLE I SCHOOLS

- June-July. Provide summer workshop for superintendent/principal/assistant principals following Federal Programs State training in June to update administration on any new guidelines and to provide guidance for "new" Title I principals, if applicable. Workshops will include the following topics: budgets, ordering, compliance, parental involvement, schoolwide programs, monitoring, academic achievement, inventory, scheduling, ethics, fraud, and waste. The Federal Programs Director will provide additional training as needed throughout the year.
- July-August- Using CCRPI information determine the schools that will need to offer FLP services and work with principals to create and mail required letters. This is not applicable to Southwest Georgia S.T.E.M. Charter at this time. The annual Input Meeting is held to ensure all stakeholders have the opportunity to participate in reviewing and revising our plans.
- August-September- Finalize any revision of plans with superintendent/principal(s). The Federal Programs Director will review plans and budgets to ensure that funds are being spent according to plans and that plans have all the necessary components.
- July – June - Inventory all items purchased by Federal Programs.
- July – June – Homeless Programs are monitored by the Federal Programs Director.
- On-going review of school improvement data and plans in conjunction with other administration, teachers and staff.
- February- Federal Programs Director attends GCEL conference
- June – Federal Programs Director attends Title I summer conference
- On-going -Budgets and purchase orders are reviewed monthly is spent by the Federal Programs Director to assist schools in spending funds as planned.
- March-April- Send the Annual Survey of Parent Involvement to parents to provide information as a means of gauging the effectiveness of parental involvement activities. Federal Program Director compiles data to determine needs for the following year.
- On-going – The Federal Programs Director provides technical assistance and meets regularly with superintendent/principal and other administrators.

The School Improvement Plan (SIP) includes data which drives student achievement. This plan is monitored by the Superintendent and Federal Programs Director. Based on continuous data analysis, principals, and leadership teams make changes to the school improvement plans. Southwest Georgia S.T.E.M. Charter follows the 8 step School Improvement Cycle.

Feedback on the Title I Schoolwide plan is provided to the superintendent/principal/other administration via the School Wide Checklist. Corrections to the plans are made as needed by the

superintendent/principal/other administration and updated copies are kept in the Federal Programs Director's office and posted on the school's website.

MONITORING OF NEGELCTED AND DELINQUENT STUDENTS

There are currently NO residential facilities for neglected and/or delinquent students in Randolph County where Southwest Georgia S.T.E.M. Charter is located.

MONITORING OF PRIVATE SCHOOLS

Since Southwest Georgia S.T.E.M. Charter has a state-wide attendance zone, SGSC is not required to monitor private schools.

LEA COMMUNICATION WITH AND MONITORING OF SPECIAL EDUCATION

Monitoring of Special Education programs in Southwest Georgia S.T.E.M. Charter is a critical component of ensuring compliance is taking place at the school. The Special Education Director convenes a meeting with building level administration before the beginning of school or soon after school starts. Teachers and Administrators receive training on policies and procedures and guidance for operating Federal Programs including Special Education. The staff is given information on expectations and copies of program guidance. Specific training is provided in different areas of special education. Information provided includes budget information, timelines, special education procedures, IEP guidelines, Child Find procedures, community partnerships, parental engagement and other areas of Special Education, as appropriate. Meetings are held with the school administrators and with Special Education Staff to provide technical assistance and targeted professional learning. Specific budget information and details of the program are given out during meeting

. Weekly and daily visits to the classrooms take place by the Special Education Director. IEP meetings are attended by the Special Education Director as well as informal meetings with parents who have concerns. Phone calls, emails, and classroom visits occur frequently between the Special Education Director and Special Education Staff. The program is monitored through on-going technical assistance, meetings, visits, and through the budgeting process.

ONSITE MONITORING PROCEDURES FOR SPECIAL EDUCATION

All schools are subjected to on-going monitoring by the Special Education Director throughout the school year. In addition, emails, face to face meeting, testing checklist, IEP checklist, review of records, and phone conversations take place throughout the year as a means of providing on-going monitoring and communication with staff members. The Special Education Director monitors and works closely with the school psychologist to ensure timelines and evaluation/re-evaluation procedures are being followed. Teachers at the school are provided with technical assistance through meetings involving special education staff.

SCHEDULES

Each school is monitored according to the timeline provided above. Sign in sheets, agendas, and materials/handouts which are discussed are maintained by the Federal Programs Director.

DATA REVIEW

Data is compiled, reviewed, and discussed during faculty and team meetings and at Board of Education meetings. System level and building level leadership meet and analyze data with the intent of improving instruction. The Principal reviews data with his/her faculty to identify and address areas which need improving. The administrators, faculty and staff drill down into the data to identify root causes that keep our school from achieving academically. After a thorough data analysis, goals are established. The Federal Programs Director and the Testing Coordinators have testing data which is used during the data analysis process. School leaders discuss this information with all staff to ensure they fully understand the data presented.

REPORTING AND CORRECTIVE ACTION PROCESS (AUDIT AND MONITORING FINDINGS)

Corrective actions from previous monitoring visits are discussed with the superintendent/principal/other administrators in order to assist them in understanding the critical need for compliance in all Federal Programs. Professional learning is provided based on needs. In addition, professional learning is used as a preventive measure to ensure that all Title staff has a clear understanding of all expectations for every facet of Federal Programs. The Federal Programs Director and outside consultants provide on-going training as a means of ensuring that all Federal Program staff are in compliance at all times.

TECHNICAL ASSISTANCE

Technical Assistance is offered at all times through e-mail and phone communication as well as face-to-face meetings to assist schools in analyzing data to identify priorities in instruction, professional learning, and effective budgeting. During the summer, a meeting is held with system and building level administration that reviews the purpose of all Federal Programs, as well as expectations and procedures related to allowable use of funds. On-going information is provided to the superintendent/principal, teachers and staff during meetings as new data is available. The Federal Programs Director maintains a file of all training conducted throughout the year. This file contains all staff training, handouts, meeting agendas, meeting notes, etc. Ongoing monitoring continues after training is conducted by the Federal Programs Director to ensure compliance.

ACCOUNTABILITY

AUDITS AND CROSS FUNCTIONAL MONITORING FINDINGS

The Southwest Georgia S.T.E.M. Charter undergoes regular audits as scheduled by the State of Georgia. Correction action plans are created to correct any findings received. The school system will maintain the appropriate documentation to indicate that correction actions have been completed and any findings have been cleared.

Steps to Audit/ Monitoring Resolutions:

- Once the audit/ Cross-Functional Monitoring report is received, the Federal Programs Director will review all items. The Cross-Functional Monitoring report will be pulled from the GaDOE website under the Consolidated Application.
- Each item will be examined carefully, and a team of district level and building level staff will determine the best means of corrective action.
- Items are gathered, and a report is written by the Federal Programs Director.
- The report is submitted to the superintendent.
- The completed report is then sent to the GaDOE/ state auditors as a means of resolution.
- The district has 30 days from the receipt of the findings to respond to the GA DOE.
- The monitoring process and the resolution process are both used as a learning resource.

Section 2: Consolidated Application

The Georgia Department of Education (GaDOE) is committed to developing tools and resources to support the efforts of local school districts to improve the academic achievement of all students. Section 1112 of the Elementary and Secondary Education Act of 1965 (ESEA) specifies that local educational agencies (LEAs) may receive funds under ESEA if the LEA has on file with the GaDOE an approved plan. Georgia's LEA Consolidated Application is a web-based application to facilitate the efficient and effective transfer of planning and budget information from LEAs. The information in this guidance is related to the planning component.

The Comprehensive LEA Improvement Plan (**CLIP**) for student academic achievement has two major components:

1. ESEA Descriptors - This section includes the descriptors required in Federal and State legislation that LEAs must address in order to receive funding. The template is designed to cover the requirements for all programs in one document. The template eliminates the need to have multiple plans. Some programs have unique components that require the completion of surveys, etc. LEAs will submit surveys and unique information through the Consolidated Application in a special section labeled Attachment Tab.

2. LEA Implementation Plan - This section includes the LEA's goals, annual measurable objectives, action/strategies and other components of an action plan. The LEA Implementation Plan eliminates the need for LEAs identified as needs improvement to submit a separate LEA improvement plan.

Each LEA must submit all components of the CLIP in order to receive funding from the following State and Federal programs:

- Title I, Part A – Improving the Academic Achievement of the Disadvantaged
- Title I, Part C – Education of Migratory Children
- Title I, Part D – Prevention and Intervention Programs for Children and Youth who are Neglected, Delinquent or At-risk
- Title II, Part A – Teacher and Principal Training and Recruiting Fund
- Title II, Part D – Enhancing Education through Technology
- Title III, Part A – Language Instruction for Limited English Proficient and Immigrant Students
- Title IV-A Student Support and Academic Enrichment
- Title VI, Part B – Rural Education Initiative
- Individuals with Disabilities Education (IDEA) – Programs for Exceptional Students
- Carl D. Perkins Vocational and Applied Technology Act
- Title X, Part C Education of Homeless Children and Youth (EHCY)
- Professional Learning

COMPREHENSIVE LEA IMPROVEMENT PLAN (CLIP) REVIEW PROCESS

The Southwest Georgia S.T.E.M. Charter must submit to the Georgia Department of Education (GaDOE) written procedures for each Fiscal Year that the District will implement to ensure that it provides the opportunity for all Title I parents to be involved in the development and review of the Title I program (CLIP) plan and schoolwide program plans. These procedures must include an

implementation timeline, sample parent invitations, description of how parents will be notified of how to be involved in the development and review of the Title I program (CLIP) plan, as well as schoolwide plans in multiple ways (web-site, phone call system, invites to meetings, flyers sent home to all parents, parent newsletter announcements). It must also develop sample agendas and documentation, including sign-in sheets with positions identified (i.e. teacher, parent, etc.) for Title I program plan and schoolwide plans meetings. CLIP revisions take place annually in late spring or early summer. Using prior year data and needs assessment information the plan is reviewed and updated for the up-coming school year. The CLIP serves as the plan detailing coordination of various Federal Programs and identification of needs and in-turn budgeting for such needs with Federal funds. System and building level leaders, teachers, support staff, as well as community and parent stakeholders are involved in the revision process. Parents are sent information inviting them to participate via mail, email, telephone, newspaper, social media, flyers, website, and newsletters (at least two of these means). The district conducts an annual meeting each year that allows parents to provide input on district policies and procedures. Parents are asked to submit written comments regarding eight various components of school programming. Parent input is examined and considered from these meetings.

Documentation includes sign-in sheets, agendas, power point presentations, emails, and returned needs assessments with comments. Comments are tallied to easily determine strengths and weaknesses. Survey results are kept on file. Several subsequent meetings are arranged to garner input from all stakeholders. For example, input is solicited from administrators, teachers and staff at faculty meetings and team meetings and through email responses. Feedback from community stakeholders is also solicited at Parent Involvement Meetings, the Annual Title I Meeting, through the school website, newsletters, and through surveys. The Federal Programs Director gathers all input and updates the Consolidated Local Improvement Plan (CLIP). The plan is submitted to the Superintendent/Principal for approval and then submitted to GaDOE specialists for review and approval.

Resolution Procedures for Unapproved Plans:

The Federal Programs Director meets periodically superintendent/principal, other administrators, teachers, and staff to review schoolwide plans, needs assessments (including school and system data), parent involvement plans, and parent school compacts; and to plan ways to retrieve feedback from parents on each of these Title I components. Peer review and review by the Federal Programs Director take place as needed. As changes and/or corrective actions are made, the plan is updated and a copy is given to the superintendent/principal for approval and then shared with the faculty and staff. Copies of the approved plans are kept in the teacher and staff handbooks, in the Federal Programs Director's office and on our school web-site. Final copies are placed in the media center and on our website for review by our stakeholders.

Southwest Georgia S.T.E.M. Charter– AN OVERVIEW OF SCHOOL-WIDE PROGRAMS

A school-wide program is a comprehensive reform strategy designed to upgrade the entire educational program in a Title I school; its primary goal is to ensure that all students, particularly those who are low-achieving, demonstrate proficient and advanced levels of achievement on State academic achievement standards. This school-wide reform strategy requires that a school:

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

Adopting this strategy should result in an ongoing, comprehensive plan for school improvement that is owned by the entire school community and tailored to its unique needs. School-wide programs are not required to identify specific students as eligible. They must supplement (enhance) rather than supplant (take the place of) the services participating students would receive if they were not participating in the school-wide program. **Southwest Georgia S.T.E.M. Charter is a Title I School.** The purpose of school-wide Title I program is to improve the entire educational program in a school, which should result in improving the academic achievement of all students, particularly the lowest achieving students. The goal of such a program is to assist those students in demonstrating proficiency on academic standards.

A school is eligible to be a school-wide program:

- If the LEA determines that the school serves an eligible attendance area;
- If the school is participating under Section 1113 (eligible school attendance areas);
- For the first year of the school-wide program the school serves a school attendance area in which not less than 40 percent of the children are from low-income families or 40 percent of the students enrolled in the school are from low-income families.

School-wide programs are not required to identify specific students as eligible. They must supplement (enhance) rather than supplant (take the place of) the services participating students would receive if they were not participating in the school-wide program. School-wide Title I schools must use funds available under Title I, Part A only to **supplement** the total amount of funds that would, in the absence of the Federal fund, be made available from non-Federal sources for that school including funds needed to provide services that are required by law for students with disabilities and with limited English proficiency.

The core elements of a school-wide program are a comprehensive needs assessment, a comprehensive plan, and an evaluation. The comprehensive needs assessment is required, and it must:

- Be based on academic achievement data of all students including disaggregated student groups and migratory students regarding the State's academic standards.
- Provide information on the subjects and skills for which teaching and learning need to be improved.
- Identify specific academic needs of students and disaggregated student groups who are not achieving at proficiency.
- Be developed with the participation of individuals who conduct the school-wide program.

The school must document how it conducted the needs assessment, the results obtained, and the conclusions it drew from the results.

The comprehensive plan must be developed for schools that operate a school-wide program using the results of the comprehensive needs assessment. The plan must describe how the school will improve academic achievement throughout the school, particularly for students who have not achieved proficiency so that all students will demonstrate proficiency on the State's academic standards. The plan must:

- Improve teaching and learning throughout the school.
- Be developed in consultation with the LEA and its leadership team or other technical assistance providers.
- Describe how the school will conduct the needs assessment, develop the plan and evaluate the results.
- Describe how the school will use Title I and other resources.
- Include a list of State and local programs and other Federal programs that the school will consolidate in the school-wide program.
- Involve parents, members of the community to be served, teachers, principals, Title I administrators, and, if appropriate, pupil services personnel technical assistance providers, and other school staff, and students if the school is a secondary school.

SCHOOLWIDE PROGRAMS

Southwest Georgia S.T.E.M. Charter conducts a School wide program. This allows all children and all parents an opportunity to have equal access to all related Title I assistance. Schoolwide plans are updated and verified using a checklist. Parents are also invited to a district meeting in the summer to provide input on schoolwide plans. All schools will notify stakeholders in multiple ways, notice of the meeting dates will be placed on the school web site and on social media. Parents and other stakeholders will be notified by invitation/flyer sent from the school. Parents that cannot attend the meeting will be given the opportunity to obtain a copy from each school and submit input before the final revisions are approved. Revision dates will be clearly marked on each plan. The principal will be responsible for collecting the required information (agenda, meeting notes, and sign in sheets). At these meetings, parents and other stakeholders are given an opportunity to provide input on the Schoolwide Title I Plan, School Improvement Plan, Parent/ Student/Teacher Compacts, Parent Involvement Plans, and the Comprehensive LEA Improvement Plan.

LEA GUIDANCE

Meetings are held with building administration to discuss the current status of their plans in regard to checklist components, as needed. Missing or items in need of revision are marked on the

checklist and then rechecked when the revised plan is submitted. The system will also include parents in at least two meetings. Copies of agendas and sign-in sheets from such meetings are collected and stored as evidence and documentation of meetings. As previously stated, system leaders support schools in developing, revising, implementing and coordinating school improvement and school wide plans, and faculty and team meetings. During the meetings, data is analyzed to identify and develop solutions to challenges related to instructional strategies, parent involvement, professional learning, and budgets.

DEVELOPMENT OF NEW SCHOOLWIDE PROGRAMS

Southwest Georgia S.T.E.M. Charter has a school wide program.

SCHOOLWIDE PROGRAM PLAN DEVELOPMENT

School Improvement and Schoolwide Plans are updated each spring/summer for the following school year. The Federal Programs Director conducts a meeting at which teachers and staff, as well as district and school administration and parents meet to revise or develop a plan. During the meeting, instructional strategies, parental involvement initiatives, and professional development activities are planned after a careful analysis of various data. Assistance is also provided to schools in their use of Federal funds to accomplish initiatives in their school improvement and schoolwide plans. The Federal Program Director then presents their school plans at the Annual Input Meeting to system leaders, teachers and staff, and parents to develop a district improvement plan (CLIP). It is through this process that the LEA oversees the development of school improvement plans.

PLAN CONSOLIDATION

Southwest Georgia S.T.E.M. Charter does not consolidate Schoolwide and School Improvement plans.

CONSOLIDATION OF FUNDS

Southwest Georgia S.T.E.M. Charter does not consolidate federal funds.

TARGET ASSISTANCE PROGRAMS

Southwest Georgia S.T.E.M. Charter does not have any target assistance programs

PRE-KINDERGARTEN PROGRAMS

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

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

Section 3: ETHICS AND FRAUD, WASTE, AND ABUSE AND CORRUPTION POLICIES

The Federal Programs Director reviews the ethics and fraud, waste and abuse policies with all administrators, faculty and staff during pre-planning. An agenda and sign in sheets are kept by the Federal Programs Director to document this has been completed. The Federal Programs Director keeps agendas and sign-in sheets to verify the policies have been reviewed with all staff, including Board Office staff. The Superintendent/Principal is expected to inform his/her faculty about policies and updates as they are approved throughout the year.

ETHICS

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

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

REPORTING SUSPICION OF FRAUDELENT ACTIVITIES

Purpose: To ensure the reporting of suspicion of fraudulent activity, Southwest Georgia S.T.E.M. Charter provides employees, clients and providers with confidential channels for such reporting.

Definitions: Fraud: A false representation of a matter of fact, whether by words, by conduct, or by concealment of that which should have been disclosed, that is used for the purpose of misappropriating property and/or monetary funds.

Statement of Administrative Regulations: Southwest Georgia S.T.E.M. Charter thoroughly and expeditiously investigates and reported cases of suspected fraud to determine if disciplinary, financial recovery and/or criminal action should be taken.

Confidentiality: All reports of suspected fraud must be handled under the strictest confidentiality. Only those directly involved in the investigation should be provided information regarding the allegation. Informants may remain anonymous but should be encouraged to cooperate with investigators and should provide as much detail and evidence of alleged fraudulent acts as possible.

Procedures and Responsibilities:

1. Anyone suspecting fraudulent activity should report their concerns to the Southwest Georgia S.T.E.M. Charter Superintendent at 229-345-3033.
2. Any employee with the Southwest Georgia S.T.E.M. Charter (temporary staff, full-time staff and contractors) who receives a report of suspected fraudulent activity must report this information within the next business day.
3. Employees have the responsibility to report suspected fraud. All reports can be made in confidence.
4. Southwest Georgia S.T.E.M. Charter shall conduct investigations of employees, providers, contractors, or vendors.
5. If necessary, the person reporting will be contacted for additional information.
6. Periodic communication through meetings should emphasize the responsibilities and channels to report suspected fraud.

CONFLICT OF INTEREST

Substantial state and federal requirements exist pertaining to standards of conduct and conflict of interest. It is the intent of the district for all employees to conduct all activities associated with procurements in compliance with the highest ethical standards, including the avoidance of any real or perceived conflict of interest. It is also the intent of the district to impose appropriate sanctions or disciplinary actions, including but not limited to termination and/or prosecution, for any employees who violate any of these requirements.

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

To receive federal funds, the district adheres to the GaDOE Conflict of Interest and Disclosure Policy. In addition to state requirements pertaining to standards of conduct and disclosure of conflict of interest, in accordance with 2 C.F.R. 200.13(c)(1) Southwest Georgia STEM Charter School System adheres to the federal standards with regard to selection, award, and administration of federal contracts.

The LEA will disclose in writing any potential conflict to federal awarding agency in accordance with applicable federal awarding agency policy. Any violation of federal criminal law involving fraud, bribery, or gratuity violations potentially affecting the federal award will be disclosed in writing in a timely manner.

Section 4: DISPUTES (COMPLAINT PROCEDURES)

Any individual, organization, or agency (“complainant”) may file a complaint with Southwest Georgia S.T.E.M. Charter (SGSC) if that individual, organization, or agency believes and alleges that SGSC is violating a federal statute or regulation that applies to a program under the Title I, Part A of the Elementary and Secondary Education Act of 1965 (ESEA). The complaint must allege a violation that occurred not more than one (1) year prior to the date the complaint is received, unless a longer period is reasonable because the violation is considered systemic or ongoing. To file a complaint that a violation of federal regulation has occurred with the Flexible Learning Program, an individual should follow the procedures:

COMPLAINT PROCEDURES

Filing a Complaint

A complaint must be made in writing and signed by the complainant using Southwest Georgia S.T.E.M. Charter’s *Federal Programs Complaint Form*. The complaint must include the following:

- A statement that Southwest Georgia S.T.E.M. Charter has violated a requirement of a Federal statute or regulation that applies to an applicable program.
- The date on which the violation occurred.
- The facts on which the statement is based and the specific requirement allegedly violated (include citation to the Federal statute or regulation).
- A list of the names and telephone numbers of individuals who can provide additional information.
- Whether a complaint has been filed with any other government agency, and if so, which agency.
- Copies of all applicable documents supporting the complainant’s position.

The complaint must be addressed to:

Southwest Georgia S.T.E.M. Charter
Attn: Amy J. Sammons, Federal Programs Director
185 Pecan Street
Shellman, Georgia 39886

Investigation of Complaint

Within ten (10) days of receipt of the complaint, Southwest Georgia S.T.E.M. Charter will issue a Letter of Acknowledgement to the complainant that contains the following information:

- The date Southwest Georgia S.T.E.M. Charter received the complaint.
- How the complainant may provide additional information.
- A statement of the ways in which Southwest Georgia S.T.E.M. Charter may investigate or address the complaint.
- Any other pertinent information.

If additional information or an investigation is necessary, SGSC will have sixty (60) days from receipt of the information to complete the investigation and issue a Letter of Findings. If the Letter of Findings indicates that a violation has been found, a timeline for corrective action will be included. The sixty (60) day timeline may be extended if exceptional circumstances occur. The Letter of Findings will be sent directly to the complainant, as well as the other parties involved.

Right of Appeal

If an individual, organization, or agency is aggrieved by the final decision of Southwest Georgia S.T.E.M. Charter, that individual, organization, or agency has the right to request review of the decision by the Georgia Department of Education. For complaints filed pursuant to Section 9503 (20 U.S.C. 7883, complaint process for participation of private school children), a complainant may appeal to the Georgia Department of Education no later than thirty (30) days from the date on which the complainant receives the Letter of Findings. The appeal must be accompanied by a copy of the Southwest Georgia S.T.E.M. Charter's decision and include a complete statement of the reasons supporting the appeal.

COMPLAINT PROCEDURES

Any complaints issued as a result of federal programming will be asked to follow district complaint procedures policy. See 'Appendix A: Complaint Procedures

Section 5: SERVICES FOR PRIVATE SCHOOLS

(N/A for Southwest Georgia S.T.E.M. Charter)

Invitations for private schools to consult in participation in federal programs the following calendar year are sent in the fall, usually October, via receipt delivery. A meeting is held to present information about the programs available to students in private schools. The Federal Programs Director conducts the meeting, which is complete with an agenda and sign in sheet. Upon receipt of the intent to participate form, which is provided to private school officials, a meeting is held to discuss plans and the required components of Title I services for private school students.

If Southwest Georgia S.T.E.M. Charter has a Private School to request funds the private school students would receive their proportional share of services via a per pupil allocations and required equitable services amounts. See Reservation of Funds. Eligibility criteria are used to determine the students who are most in need of services. Using assessment data provided by the private school, scores/levels are given ranges and point values are applied to those ranges.

When a private school determines that the school would like to participate in Title I or Title II, the district will determine the per pupil allocation for qualified students. The federal government has issued the following guidelines in determining the eligibility requirements for private schools desiring to participate in Title I services:

Which private school students are eligible to receive benefits?

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

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

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

DOCUMENTATION FOR PARTICIPATION

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

IDENTIFICATION OF PARTICIPANTS

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

FINANCE

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

COMPLAINTS

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

EVALUATION

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

EQUIPMENT

The private schools will follow the same procedure as the Southwest Georgia S.T.E.M. Charter.

FIDUCIARY RESPONSIBILITY

Section 6: MAINTENANCE OF EFFORT AND COMPARABILITY, ASSESSMENT SECURITY (ALL FEDERAL PROGRAMS EXCEPT TITLE I, PART C, 1003(a) and 1003(g)

MAINTENANCE OF EFFORT

GaDOE compares the fiscal effort of the preceding year to the second preceding fiscal year and makes the maintenance of effort determination available to the system through a marked “met” or “unmet” on the consolidated application. Documentation for MOE is only required for districts that do not meet the required maintenance of effort. The Federal Programs Director will pull the MOE information from the Consolidated Application each school year for documentation purposes.

COMPARABILITY OF SERVICES

Southwest Georgia S.T.E.M. Charter is a School-wide Title I School. There are no overlapping grade spans. Therefore, it is not necessary to complete comparability of services.

ASSESSMENT SECURITY

Testing Director:
Mrs. Cindy Carlson

Southwest Georgia S.T.E.M. Charter conducts the assessment program as required by federal and state law. It is in compliance with the Elementary and Secondary Act (ESEA) and Georgia law relative to student assessment and data reporting. Southwest Georgia S.T.E.M. Charter interacts with state and federal agencies relative to the assessment program and accountability mandates. The Testing Director handles assessment documents and reports including secure test materials, individual student score reports, and school/district data reports in both paper and electronic formats. Southwest Georgia S.T.E.M. Charter delivers training/guidance related to the assessment program, assessment data, and accountability mandates to all stakeholders.

MATERIALS

- a) All school testing coordinators must have a sign-in sheet for documentation of teacher and proctor participation.
- b) GaDOE updates provided on each test being administered will be provided as a reference/resource for testing coordinators.
- c) School Coordinator’s Manuals and Examiner’s Manuals are usually available on the GaDOE’s website. These manuals are used to assist in training. All manuals must be kept secure and accounted for after each use.
- d) School Coordinators should refer to the Roles/Responsibilities for all individuals being trained from the GaDOE Student Assessment Handbook including but not limited to: coordinator, principals, examiners, and proctors. Training covers each group’s roles/responsibilities as documented on the sign-in sheets.

EXAMINERS AND PROCTORS SIGN ACKNOWLEDGING RESPONSIBILITIES FOR TESTING

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

COLLECTION OF MATERIALS

- a) Sign-in and Sign-out sheets are used to document who is responsible for each individual test booklet, the date, and number of test booklets received.
- b) Before testing documents are returned to the Testing Director.

TRAINING PLAN

I. Materials:

- a) All Testing Directors must have a sign-in sheet for documentation of teacher and proctor participation.
- b) GaDOE Updates provided on each test being administered will be provided as a reference/resource for school testing coordinators.
- c) School Coordinator's Manuals and Examiner's Manuals are usually available on the GaDOE's website. Please use these manuals to assist in training. All manuals must be kept secure and accounted for after each use.
- d) Testing Directors should refer to the Roles/Responsibilities for all individuals being trained from the GaDOE Student Assessment Handbook including but not limited to: coordinator, principals, examiners, and proctors. Training covers each group's

roles/responsibilities as documented on the sign-in sheets. Examiner's and Proctors sign acknowledging responsibilities for testing.

II. Topics:

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

III. Collection of Materials:

- a) Sign-in and Sign-out sheets are used to document who is responsible for each individual test booklet, the date, and number of test booklets received.
- b) The Testing Director carefully accounts for all materials.
- c) During the document count, the Testing Directors checks for complete information (Form Numbers, Labels, Names...) on each answer document.
- d) Once the materials are re-counted by the Testing Director, the materials are packaged for delivery.
- e) Principal Certification Sheets are required on all standardized tests. This document must be returned at the time of delivery of the testing materials.

FISCAL REQUIREMENTS

Section 7: SUPPLEMENT NOT SUPPLANT AND INTERNAL CONTROLS

The Elementary and Secondary Education Act of 1965 (ESEA) provides several fiscal requirements that are applicable to Title I, Part A funds. Local educational agencies (LEAs) must maintain the financial effort previously provided with State and local funds to Title I schools. LEAs may not use Title I funds to **supplant** or replace state or local funds. LEAs must provide services to Title I schools that are comparable to those of non-Title I schools.

PRE-APPROVAL OF PURCHASES

Southwest Georgia S.T.E.M. Charter has procedures in place for Title purchases to maintain internal controls and to avoid fraud, waste, and abuse of federal funds. All purchases must be pre-approved prior to an order being placed. This includes orders from RESA and other companies where orders can be placed online. **Any contract award at or above the \$25,000 threshold must not be made to parties listed on the government-wide exclusions in the System for Award Management (SAM).**

EXPENDITURE OF FUNDS

Upon receiving allocations, each school will use a spreadsheet entitled "Blank Budget Worksheet and Narrative Template" to develop a budget for the use of federal funds and send it to the Federal Programs Director. Upon completion of the budgeting approval process with school and system title funds, the budget will be entered into the consolidated application system. Once approved at the state level, the Director of Finance will then enter the budget into the financial system software. The Director of Finance will review the budget entered into the financial system against the consolidated application for accuracy and allowable use of funds. Any discrepancies between the entered budget in the local system and the consolidated application must be corrected prior to spending and draw-down of funds related to spending.

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

REASONABLE AND NECESSARY USE OF FUNDS

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

- (a) Do I really need this?
- (b) Do I need to spend these funds to meet the purposes and needs of the program?
- (c) Do I have the capacity to use what I am purchasing?

- (d) Did I pay a fair rate and can I prove it?
- (e) Would I be comfortable defending this purchase?
- (f) Is the proposed cost consistent with the underlying needs of the program?

ALLOWABLE AND UNALLOWABLE COSTS

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

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

The Federal Programs Director prepares a written report of the preliminary Title I budget once this information becomes available from GaDOE. The report is submitted to the superintendent. All approved Consolidated Application budgets for all federal programs will be presented to the Board by the Federal Programs Director once they are approved by the GaDOE. Copies of the meeting agenda, minutes, and materials presented and approved budget will be maintained in the Title I office.

BUDGET APPROVAL PROCESS

- Funding amounts are approved by the GaDOE Board of Education
- Award letters are sent to districts
- Schools are given the allocated dollar amount for budgeting
- The budget is entered into the GaDOE Consolidated Application (electronic grant application process) by the program coordinator or authorized staff
- The budget is approved by the program coordinator
- The budget is approved by the superintendent (budget may be rejected at this level and requests for revisions may be made)
- The budget is approved by the program specialist at the GaDOE (budget may be rejected at this level and requests for revisions may be made)
- The budget amount is approved by GaDOE Accounting
- The budget is presented to the district BOE
-

PERIODIC CERTIFICATIONS

Periodic certifications for all Title I paid staff takes place after-the-fact. The process takes place twice yearly. The first one for the year takes place after the first semester and the second periodic certification takes place after the second semester. The forms are signed and kept on file in the Title I office. A Periodic Certification Form that is allowed to meet the OMB Circular A-87, Attachment B, Paragraph 8.h.(3) (codified in 2 CFR Part 225) requirement that all 100% paid Title I employees must sign a Periodic Certification semi-annually was implemented beginning 2013-2014. The form must be signed by a supervisory official having first-hand knowledge of the work performed by the employees listed on the form and must still be completed semi-annually. One teacher is paid with Title I funds and a bi-weekly schedule is submitted to the Federal Programs Director with signature and date.

SPLIT-FUNDED PERSONNEL

Southwest Georgia STEM Charter School System does not -utilize split-funded personnel paid with a combination of Title I and state/local funds. Southwest Georgia STEM Charter School System complies with all EDGAR regulations as it relates to split-funding procedures. Any employee being paid with Title funds or a combination of funds will be required to complete monthly time sheets to verify the appropriate work under federal program regulations, when applicable.

Split-funded personnel are required to maintain personnel activity reports also known as a time log delineating the specific Title I and non-Title I duties. The format used is the time log form found on the GaDOE website. Forms are signed monthly by the immediate supervisor of the staff member. The time log (PAR) is filled out after the end of each month and submitted to the immediate supervisor for review and signature. Supporting documentation (source documentation) is kept by the person owning the time log. This source documentation includes calendar entries, etc. Signed forms will be maintained in the Title I office.

CONSULTANTS, CONTRACTS, PURCHASED SERVICES FOR TITLE I FUNDS

Contracts are required for all consultants and purchased services. Agreements are entered into between the Southwest Georgia S.T.E.M. Charter and the consultant. Each contract contains the following:

- Contracts are generated by Federal Programs Director
- Specific duties are specifically spelled out for each contract.
- The consultant must also submit to be fingerprinted if they are working with students.
- The contract includes the number of hours to work and the rate of pay.
- Federal Program Director must submit time logs based on the payroll deadlines from the Payroll Department.

Each contract is signed by the following: Contractor (can be electronic), Superintendent/Principal, and Federal Programs Director. The Federal Programs Director provides oversight in ensuring that all contractors' work is complete. Artifacts, daily sign in sheets, and completion of all workshops are kept on file in the Title I office. The Federal Programs Director signs off on all invoices/contracts prior to the issuance of payment for services. These contracts must be maintained and kept in the Title I files.

TRAVEL EXPENSES

All travel reimbursements are made according to state travel regulations.

SUPPLEMENT VERSUS SUPPLANT

Title I expenditures are supplemental to schools' budgets. Personnel are in addition to the number required to meet maximum class size as determined by GaDOE. Title I funds are only used to supplement and, to the extent practical, increase the level of funds that would, in the absence of Title I funds, be made available from non-federal sources for the education of students participating in Title I programs. Title I funds are not used to take the place (supplant) of local, state, or other federal funding and are not provided to participating Title I children when the same services are provided to non-Title I children with non-federal funds. Conversations regarding supplement vs. supplant are held quite often throughout the year as requisitions are made. The programs/activities provide supplemental services to programs that are required by federal, state, and local law. Title I funds do not support programs that were paid with state or local funds unless there has been evidence of precipitous decline. The Board of Education must approve the precipitous decline documentation. Title I is not supporting any programs that are being supported in non-Title schools with state or local funds. All principals are made aware of the supplement not supplant issue during the training that takes place during the summer month before school starts. Principals review all requests from Title I staff for all budgetary requests. The Federal Programs Director reviews budget requests to ensure that supplanting is not taking place.

Title I uses the follow questions to ensure that programs are supplementing, not supplanting: Respond "NO" to the following questions:

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

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

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

If the answer to either of these questions is "Yes" then Title funds cannot be used. Title I funds in a Schoolwide Program are expected to demonstrate that they are *over and above* the amount provided to all schools in the district. The Federal Programs Director approves all purchases/contracts prior to purchase/agreement to ensure "supplement vs. supplant" guidelines are met.

OMB Circular A-133 Compliance supplement presumes supplanting has occurred if federal funds are used to provide services that:

- Were required to be made available under other federal, state, or local laws.
- Were provided with non-federal funds in prior years.

- Were provided to Title I participating children, if those same services are provided with non-federal funds to non-Title I children.

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

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

EQUIPMENT AND REAL PROPERTY

EQUIPMENT INVENTORY

All Title I schools are required to maintain an active inventory of all items purchased with federal funds. An inventory system is in place to keep track of items with a life expectancy of one year or more that are purchased with Federal funds. This includes items purchased for the central office, and the district's public schools. All regular Title I items are marked with a label which has the fiscal year, Program Code and FAIN number. The label is placed on the equipment in a location easy to see. An updated inventory is done on an annual basis and a copy of the inventory report is kept on file in the Federal Director's office and at the school. The inventory is reviewed annually by the Federal Programs Director.

Inventory Management

Federal Programs inventory is maintained on a spreadsheet by school and District office that identifies the item, date of purchase, location, serial number, vendor, unit cost, funding source, use, condition, and disposition. All Federally fund equipment is assigned a location within the school (room number) or district office upon receipt of the product. The location of the product is noted in the school/system inventory spreadsheet.

A districtwide inventory control system accounts for all equipment purchased with Federal dollars and contains the required elements: (Description, Serial ID Number, FAIN number, Vendor, Purchase Date, Unit Cost, Funding Source, Location, Use, Condition, and Disposition.)

Equipment with an acquisition cost of less than \$5,000 which is at least five years old and no longer effective has been purged or transferred to another location. This includes schools that have closed.

Inventory of all equipment and property belonging to any Federal program is identified and inventoried bi-annually. The Federal Programs Director verifies an inventory of items purchased with Federal funds each fall and each spring. Signed and dated copies of the inventories are kept by the Federal Programs Director and copies given to the CFO. Materials purchased for use in Federal programs will be labeled and be utilized in the capacity for which it was purchased.

Any equipment, materials and/or supplies purchased with Federal funds are considered solely for the use of that program. In the event the equipment is no longer usable, materials and equipment will be disposed of following the District disposal procedures. Equipment that is damaged, lost, or stolen will be reported to the Federal Programs Director. Damaged and inoperable equipment will be returned to each school's Media Center and noted in the inventory as being broken, stolen, etc. A police report will be required for stolen property. Lost equipment will be verified by the principal and noted in the inventory. Disposed items must remain on inventory for a period of three years.

Offsite use of Equipment

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

Spring Physical Inventory Conducted by Federal Programs Director or Designee

The Spring Physical On-site Inventory is conducted each spring.

- The Federal Programs Director or his/her designee will perform the inventory
- The person conducting the inventory will sign and date the inventory check list to provide verification that the inventory was conducted
- A copy of the verification must be maintained in the Federal Programs Director's office

Theft of Equipment or Technology Funded by Federal Funds

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

- File an incident report with the police
- Attach the incident report to the Technology Disposal Form and send to the Federal Programs Director's office.
- Make corrections to the Federal Programs inventory and maintain notation of the incident for 3 years.
- Send the updated inventory to the Federal Program Director's office. The principal or other design must sign and date the inventory spreadsheet.

Consultants, Contracts, Purchased Services for Federal Funds

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

- Contracts are generated by Federal Programs Director
- Specific duties are specifically spelled out for each contract.
- The person must also submit to be fingerprinted if they are working with students.
- The contract includes the number of hours to work and the rate of pay.
- The time frame of a contract cannot extend beyond the current grant period.
- Copies of signed contracts must be maintained on file.
- The Federal Programs Director or designee must verify performance deliverables, for example sign in sheets for professional learning activities.

DEBARMENT AND SUSPENSION

Southwest Georgia S.T.E.M. Charter will not enter into contracts with vendors that are suspended or debarred. Covered transactions include those procurement contracts for goods and services awarded under a non-procurement transaction that are expected to equal or exceed \$25,000. Southwest Georgia S.T.E.M. Charter will utilize SAM to search vendors to check for suspended or debarred parties. The District will also maintain documentation of the search in the Program's office. Federal Programs Director will look at total cost for vendors on a quarterly basis. If the totals over the course of the year exceed \$25,000, SAM will be utilized to search all vendors and documentation will be maintained. Contracts with consultants/vendors will be required to contain specific language on suspension and disbarment.

PROCUREMENT

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

Acquisition of Federally Funded Services or Equipment

1. Software packages, program models, and other instructional support packages will be evaluated by a committee led by the Superintendent or Federal Programs Director prior to purchase to ascertain that the purchase meets needs identified in the District's/School's needs assessment.
2. All purchases must be pre-approved and aligned with the District's CLIP and/or the School's SWP

and SIP. (Items not budgeted will not be approved)

3. All technology items must meet requirements of the Technology Department's Supervisor.
4. Prior to placing inventory in the schools, the Federal Program Director will:
 - a. Inventory all items
 - b. Items will be prepared for use (imaged, tested for issues, labeled, etc.)
 - c. Ensure computer technicians setup the equipment in the designated buildings and rooms as indicated on the inventory.

Full and Open Competition

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

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

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

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

Solicitation

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

Procedures for Purchasing and Monitoring of Funds

Each budget, based on needs and requests is completed by the Federal Program Director. Once the necessary compilation is made by the Federal Programs Director and is submitted and approved by the state, the Federal Programs Director enters requisitions (as submitted by the principal and teachers/staff) via purchase orders.

All Federal Programs purchase orders (PO) are signed by the superintendent and the Federal Programs Director and sent to the Financial Director. The approved PO is then faxed (or mailed) to the vendor. The Finance Director makes a copy of the complete packet and keeps it in a

notebook for the Federal Programs Director. A notebook with complete packets is kept in the Finance Director's office also.

When the invoice is received in the central office from the vendor, the Finance Director matches the invoice to the PO. All Title invoices are sent to the Federal Programs Director who places the merchandise in the Media Center for processing. The Federal Program Director and one other person signs the packing slips for verification that merchandise was received. The two-signature packing slips are returned to the Finance Director as verification of goods received vendor check runs are completed. After the approval is obtained, the Finance Director enters the amount as a claim. The checks are run on blank stock and then pulled from printer and signed by the superintendent. The checks are then processed for mailing. Southwest Georgia S.T.E.M. Charter uses the indirect cost calculation, chart of accounts, and Grants Accounting Online Reporting System (GAORS) provided by GADOE to plan, budget, expend, and draw funds. School and district level budgets are also built based upon the required set asides and amounts for neglected students, private school participation, homeless, parent involvement, professional learning for highly qualified teachers, and the other general provisions as required (public choice and supplemental services).

Methods for Procuring with Federal Funds

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

Micro-Purchases (Purchases up to \$3,000). §200.67 and §200.320(a). Micro Purchase is a purchase of supplies or services using normal acquisition procedures, the aggregate amount does not exceed \$3,000 (except for construction subject to the Davis-Bacon Act which does not exceed \$2000). To the extent practicable, the district distributes micro purchases equitably among qualified suppliers. Micro-purchases may be awarded without soliciting competitive quotations if non-federal entity considers the cost reasonable.

Small Purchases (Purchases between \$3,001 and \$24,999 in the Aggregate) §200.320(b). The federal threshold for small purchases is \$150,000. However, the state threshold that does not require competitive bidding is \$100,000.

For purchases of goods or services between \$3001 and \$24,999 using federal funds, the LEA must obtain price or rate quotations from an adequate number (at least two) of qualified sources through a "relatively simple and informal process."

Small Purchases of \$25,000 to \$99,999 in the Aggregate. Purchases of \$25,000 to \$100,000 should follow the procedures for other small purchases between \$3001 and \$24,000.

Purchases of \$100,000 or More in the Aggregate. Georgia Code 36-91-20 and 36-91-21 are followed for purchases of \$100,000 or more. Also, the Georgia Department of Education guidelines are adhered to. One of the three following methods must be used, for purchases above \$100,000 when using federal funds: sealed bids; competitive proposals; or non-competitive proposals (sole source).

Sealed Bids

Bids are publicly solicited and a firm fixed price contract is awarded to the responsible bidder whose bid, conforming with all the material terms and conditions of the invitations for bids, is the lowest in price. A complete, adequate, and realistic specifications or purchase description is available; two or more responsible bidders are willing and able to compete effectively for the business; and the procurement lends itself to a firm fixed-price contract and the selection of the successful bidder can be made principally on the basis of price. The invitation for bids must be publicly advertised. All bids will be opened at the time and place prescribed in the invitation for bids. The bids must be opened publicly. Where specified in bidding documents, factors such as discounts, transportation cost, and life cycle costs must be considered in determining which bid is the lowest. Any and all bids may be rejected if there is sound documented reason.

Competitive Proposals

A competitive proposal is normally used with more than one source submitting an offer and sealed bids is not appropriate. Request for proposals must be publicized and identify all evaluation factors and their relative importance. Proposals must be solicited from an adequate number of qualified sources. Contracts must be awarded to the responsible firm whose proposal is most advantageous to the program, with price and other factors considered.

Noncompetitive Proposals (Sole Sourcing)

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

- *The item is available only from a single source. This must be documented.
- *The public emergency for the requirement will not permit a delay resulting from competitive solicitation.
- *After solicitation of a number of sources, competition is determined inadequate.

Cost/Price Analysis for Federal Procurements in Excess of \$150,000

The district will make independent estimates of the goods and services being procured before receiving bids or proposals to get an estimate of how the goods and services are valued in the current market. To accomplish this, after bids and proposals are received, but before awarding a contract, the district will conduct either a price analysis or cost analysis, depending on the type of contract, in connection with every procurement with federal funds in excess of \$150,000.

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

Price Analysis Competitive Contracts: The price analysis determines if the lump sum price is fair and reasonable based on current market value for comparable products or services. In general,

the price analysis can only be used with competitive contracts and is usually used with fixed price contracts. Total cost must be reasonable in comparison to current market value for comparable products and services.

Equipment Disposition: no longer needed for original intent, loss, damage or theft

The District uses adequate safeguards to prevent loss, damage, or theft of the equipment. Control features include:

- Locks (for particularly valuable or vulnerable items)
- Access controls to storage buildings limit entry by unauthorized personnel
- Logs or sign-in sheets for certain items of property; for example, iPads, laptops, cameras, projectors
- Promptly entering items received into the inventory management system

Loss, damage and/or theft of equipment purchased with Federal funds is reported to the district level Federal Programs Director.

Documentation includes notification of loss, damage or theft of equipment and, if appropriate, any police reports.

When property purchased with federal funds becomes obsolete, unusable or surplus to School District needs, or is otherwise not in the school's best economic interests to retain, it may be disposed of by sealed bids, public auction or other means as practical or cost effective.

The sale, exchange or disposal of real property shall be approved by the Superintendent of Schools and reflected on the inventory.

Inventory records are maintained until equipment is disposed of or transferred to another federal program (minimum of 5 years). Records for real property and equipment acquired with federal funds are retained for three years after transfer or final disposition. Disposition/transfer will occur at the close of the federal program/school, if equipment is no longer needed for original intent and transferred to another federal program, or in the event the equipment is no longer usable. Equipment that is damaged, lost, or stolen will be reported to the Federal Programs Director. Damaged and inoperable equipment will be returned to the Federal Programs Office. The condition will be noted on the inventory spreadsheet. Records for items identified for disposition are maintained on the inventory for three years before final removal. Once disposed of, the Federal Programs Office will be informed and the appropriate notation will be made in the inventory records and documentation retained. A police report will be required for stolen property. Lost equipment will be verified by the principal and noted in the inventory. In the event that a federal program is no longer available, federally purchased equipment will be transferred equitably to the inventory of another functioning federal program.

Also, equipment with an acquisition cost of less than \$5,000 which is at least five years old and no longer effective may be purged or transferred to another location. This includes equipment for schools that have closed.

All sales of real property shall be approved by the Superintendent prior to the sale of such property; no private sales shall be made. The highest price possible will be sought. Sales will be

publicized in advance of the sale date. All proceeds from sales shall be deposited in the general fund or some appropriate centralized fund.

When original or replacement equipment acquired with federal funds is no longer needed for the original project or program, the equipment may be retained, sold or disposed, if it is not needed in any federally funded project or program. The LEA will need to ensure that records are kept and made available for monitors and auditors as to where the equipment was transferred.

The following are the procedures to eliminate any equipment item from the inventory:

1. Equipment items with an acquisition cost/current per unit fair market (an explanation is provided in the Definitions section) value of less than \$5,000 and are more than three years old may be retained, sold or disposed, with no further obligation to the District. The disposition of such items should be so noted on the equipment inventory maintained by the LEA.
2. Equipment items with an acquisition cost of \$5,000 or more may be retained or sold and the awarding agency (District) shall have a right to amount calculated by multiplying the current market value or proceeds from sale by the awarding agency (District's) share of the equipment.
 - a. If the current per unit fair market value is \$5,000 or more, the equipment may be retained or sold and the awarding agency (Department) shall have a right to an amount calculated by multiplying the current market value or proceeds from the sale by the state's share of the equipment. However, the entity is permitted to deduct and retain from the state's share \$500 or 10-percent of the sales proceeds, whichever is less, for the entity's selling and handling expenses. Note: The Department does not require this of Georgia's Title I LEAs. To date, the Department has not required this action of LEAs for the sale of Title I property in a district. However, this procedure is outlined in EDGAR §80.32 Equipment (4) (e) and allows a state to require this process from their LEAs.
 - b. The disposition of such items should be so noted on the equipment inventory maintained by the recipient. The recipient should include the date of disposal and sales price or the method used to determine current fair market value if the recipient compensates the state.

The Superintendent/Principal is not permitted to make Federal purchases before they are approved by the appropriate procedure. A streamlined process of approval is in place for purchases made with system credit card, but prior approval is still required.

Federal programs inventory is maintained on a spreadsheet by the Federal Programs Director. The spreadsheet identifies/describes the item, date of purchase, location, serial number, FAIN number, vendor, unit cost, funding source, use, condition, and disposition. Equipment purchased with federal funds is permanently marked with a property inventory sticker.

Location

All federally funded equipment is assigned a location within the school or district office upon receipt of the product. The location of the product will be noted in the school/system inventory spreadsheet.

Inventory

Inventory of all equipment and property belonging to any federal program is inventoried bi-annually. The Federal Program Director will verify an inventory of items purchased with federal funds early each fall and spring. Signed and dated inventory lists are given to the Federal Programs Director. The Federal Programs Director will make spot-checks of equipment and inventory to ensure inventory procedures are being followed. Materials purchased for use in federal programs will be labeled and be utilized in the capacity for which it was purchased. Any equipment, materials and/or supplies purchased with federal funds are considered solely for the use of that program.

LEASE OF EQUIPMENT

The school system does not lease equipment using Title funds.

USE OF EQUIPMENT IN TARGETED ASSISTED SCHOOLS

The school system does not have any targeted assistance schools.

SITE VISITS

The Federal Programs Director's office is located within the one school building. The Federal Programs Director will work with the Superintendent/Principal, faculty and staff using the State provided monitoring document and timeline to ensure that guidelines/deadlines are met for each program. Additionally, the Federal Programs Director will work with the Superintendent/Principal to correct any findings and answer any questions.

EQUIPMENT DISPOSITION PROCEDURES

When computer equipment is no longer operational, it will be recycled or disposed of safely and securely. Schools are given the opportunity each summer to dispose of technology that is out of date or no longer operational. The Technology Director and the Federal Programs Director together to determine whether computer equipment is still functional. The Federal Programs Director tracks the disposal of the equipment. Inventory records are corrected, printed, and maintained by the Federal Programs Director. At the designated time, the outdated technology is brought to a predetermined location to be recycled. The Technology Department and Federal Programs Director works to dispose of and recycle all equipment. At that time, the Federal Programs Director determines whatever is most appropriate for the equipment. Currently, the school system does not receive any money for the recycle or disposal of equipment.

CASH MANAGEMENT

INTERNAL CONTROL PROCEDURES

Requisition of Equipment

1. Each budget prepared by the Federal Programs Director, revised by school personnel, if necessary, and approved by the Superintendent/Principal. Once a school makes the necessary compilation and the budget is submitted and approved by GaDOE, the Federal Programs Director fills out purchase order requisitions based on needs and requests by teachers.
2. The Federal Programs Director initiates the purchase order form, complete with:
 - Complete vendor information including phone number (and fax number if applicable)
 - Ship to information including the address for the school
 - The Federal Programs Director and the Superintendent signs approving the order after he/she verifies the materials being requested are part of the SWP and is an allowable purchase by Federal Program guidelines.
3. The Federal Programs Director reviews the requisition to assure that the purchase is included in the School-Wide/School Improvement Plan.
4. The Federal Programs Director then signs off on the requisition and forwards the requisition to the Finance Director in the BOE Office.
5. The Finance Director checks obtains the signature of the Superintendent and the Federal Programs Director on all purchase order packets, assigns a P.O. number, logs the P.O., and orders the materials/resources through the appropriate vendor.
6. When the merchandise arrives, the school or department then signs that the merchandise is accounted for and returns the packing slip to the Finance Director for payment. There must be two signatures on the packing slip to verify that materials have been accounted for.

PROFESSIONAL LEARNING STIPENDS

Southwest Georgia S.T.E.M. Charter provides continual professional learning for educators. In accordance with federal programs guidelines, teachers are paid professional learning stipends for off-contract hours during the summer and/or other days such as work adjusted days. To be eligible for a stipend, the following criteria must be met:

1. The professional learning is **required** to be part of the school's and/or the system's improvement plan.
2. The professional learning stipends can only be used to pay academic area content teachers and paraprofessionals in grades K-12.
3. Participants must complete and submit approval and/or RSVP form to the Federal Programs Director prior to the training.
4. Upon completion of the professional learning session, the participant must turn in an agenda, travel form with mileage verification (MapQuest) with all required signatures to the Federal Programs Director.
5. The Federal Programs Director will verify all of the above and then sign off on the time sheet which will then be submitted for payment to the Finance Director.
6. Payment of stipends will follow WCSS' payroll calendar. Submittals made after the due date for leave sheets will be paid the following month.
7. Payment of stipends will follow the SGSC's stipend procedure.

NOTE: ALL TERMS OF THE PROFESSIONAL LEARNING REQUIREMENTS MUST BE MET TO QUALIFY FOR PAYMENT.

DRAW DOWN PROCEDURES

The Finance Director draws down funds as follows:

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

REPORTING PROCEDURES

Copies of completion reports for the previous fiscal year will be kept on file in the Finance Directors office. Accounting records to support the results of outlays (expenditures indicated in the completion report will be kept on file in the Title I office and Finance Department. Copies of expenditure (cumulative through) reports for the respective quarter for total expenditures reported to GaDOE will be kept on file in the Title I office and Finance Department. The Finance Director will run budget summary and detailed expenditure reports for all 400,402, 403, and 430 funds for the Federal Programs Director to review. The Federal Programs Director reviews budget summary reports with the Finance Director.

Section 8: WITHIN DISTRICT ALLOCATION PROCEDURES

ATTENDANCE AREA DETERMINATION

Southwest Georgia S.T.E.M. Charter **only has one school. Therefore, attendance area determination is not needed to establish rank order.**

A local educational agency (LEA) shall use funds received under the Title I, Part A of the Elementary and Secondary Education Act of 1965 (ESEA) only in eligible school attendance areas. The term *school attendance area* means, in relation to a particular school, the geographical area in which the children who are normally served by that school reside; and the term *eligible school attendance area* means a school attendance area in which the percentage of children from low-income families is at least as high as the percentage of children from low-income families served by the LEA as a whole.

The following points summarize the requirements of Section 1113 of ESEA and 200.77 and §§200.78 of the Title I regulations for identifying eligible school attendance areas; selecting those eligible areas that will participate in Title I, Part A; and allocating Title I, Part A funds to *participating areas*:

GENERAL SELECTION REQUIREMENTS

1. An LEA must rank **all** of its school attendance areas (the geographic area from which a public school draws its children) according to their percent of poverty.

An LEA must use the same measure of poverty for:

- Identifying eligible school attendance areas
- Determining the ranking of each area
- Determining the allocation for each area.

The LEA must select a poverty measure from the following options:

- Children ages 5 to 17 in poverty as counted in the most recent census data approved by the Secretary.
- Children eligible for free or reduced price meals (FRM) under the Richard B. Russell National School Lunch Act.
- Children in families receiving assistance under the state program funded under Title IV, Part A of the Social Security Act Temporary Assistance for Needy Families (TANF).
- Children eligible to receive medical assistance under the Medicaid program.
- A composite of any of the above measures.

An LEA must rank school attendance areas based on the **percentage** (not the number) of low-income children counted.

2. After an LEA has ranked all of its school attendance areas by poverty, the LEA must first serve, in rank order of poverty, its areas above 75 percent poverty, including **any** middle schools or high schools.

3. Only after an LEA has served all of its areas with a poverty rate above 75 percent may the LEA serve lower-ranked areas. The LEA has the option to (1) continue on with the district-wide ranking or (2) rank remaining areas by grade span groupings.

The same district-wide poverty average must be used if the LEA selects option (1).

For ranking by grade span groupings, the LEA may use (1) the district-wide poverty average or (2) the district-wide grade span poverty averages for the relevant grade span grouping.

If an LEA has no school attendance areas above 75 percent poverty, the LEA may rank its schools district-wide or by grade span groupings.

An LEA's organization of its schools defines its grade span groupings. For example, if an LEA has elementary schools serving all elementary grades, middle schools, and high schools, the grade span groupings would be grades K to 5, 6 to 8, and 9 to 12. To the extent an LEA has schools that overlap grade spans (e.g., K to 5, K to 8, 6 to 8); the LEA should include a school in the grade span in which it is most appropriate.

4. An LEA with an enrollment of less than 1,000 students or with only one school per grade span is not required to rank its school attendance areas.

LEA Discretion in Selecting Participating Areas and Schools

5. An LEA may:

Designate as eligible any school attendance area or school in which at least 35 percent of the children are from low-income families - i.e., the 35 percent rule.

Use Title I, Part A funds in a school that does not serve an eligible school attendance area if the percentage of children from low-income families enrolled in the school is equal to or greater than the percentage of such children in a participating school attendance area of the LEA.

Elect not to serve an eligible school attendance area or school that has a higher percentage of children from low-income families (than a school that is served) if:

- The school meets the Title I comparability requirements.
- The school is receiving supplemental funds from other state or local sources that are spent according to the requirements of Sections 1114 or 1115 of ESEA.
- The funds expended from such other sources equal or exceed the amount that would be provided under Title I, Part A.
- For one additional year only, designate and serve a school attendance area or school that is no longer eligible but was eligible and served in the preceding year. When using this option, an LEA must meet the requirement to serve schools in rank order.

If Southwest Georgia S.T.E.M. Charter had more than one school per grade band the District would use the following ranking procedure for its CEO schools:

Community Eligibility Option (CEO) (N/A for Southwest Georgia S.T.E.M. Charter)

With the passage of the Healthy, Hunger-Free Kids Act of 2010 (Act), the National School Lunch Program now includes a new universal meal program, the Community Eligibility Option, which is being phased in over several years by the U.S. Department of Agriculture (USDA). The Community Eligibility Option (CEO) permits eligible schools to provide meal service to all students at no charge, regardless of economic status. The CEO uses only direct certification data, such as data from the Supplemental Nutrition Assistance Program (SNAP) or Temporary Assistance for Needy Families (TANF) program to determine the Federal cash reimbursement provided by USDA. CEO will not rely on annual household applications that are generally used to determine eligibility for free or reduced meals (FRM). The following procedures would be implemented to determine rank order for the CEO at Southwest Georgia S.T.E.M. Charter.

The Food Service Department provides a list, by school, of the number of students who are direct certified (DCs) Students through SNAP (Supplemental Nutrition Assistance Program) or TANF (Temporary Assistance for Needy Families), Extended Eligible (students “attached” to DCs), Homeless, Runaways, Migrant, Foster children, and/or approved by Local Officials. This information is entered into the Food Service form “District CEO Participation by Site”. Also, the

Food Service Director signs off on the FTE October report verifying the number of Pre-K students at each elementary school who are DC for Free and Reduced Lunch.

This number is entered into the Eligible Attendance Area worksheet in the column “economically disadvantaged students identified by data for school lunch program minus Pre-K”

This number may or may not be multiplied by the 1.6 multiplier to give the percentage of SGSC students by school.

Each school is then rank ordered from highest to lowest percentage.

If a new school is opened or one decides to pull out of CEO the following procedures will be followed.

Non-CEO Schools Eligible Attendance Area Worksheet and Rank Order Procedures

1. Pull Free and Reduced (F&R) information from GaDOE website. You must use the previous year's 1st October Free and Reduced Lunch Count and the previous year's 1st October FTE. The FTE count is for enrollment. The Free and Reduced Lunch Count is used for determining the number of free and reduced meals.
2. This process should take place starting in April.
3. If applicable: Determine new schools or schools that are being redistricted/ rezoned. You will also need to request the names of the students being moved from one school to another in this rezoning/redistricting process in order to obtain a count. This information may be obtained from Instruction and/or Transportation Director.
4. Request the free and reduced information for students affected by moving to a different school due to a new school opening or redistricting/ rezoning. This information is obtained from the Nutrition Department.
5. For each school, list the schools receiving students and indicate the number free and reduced lunch students.
6. Place all information for all schools in the district on the large spreadsheet
7. Complete Worksheet for Determining the Number of Students Moved.

Complete the Worksheet for Eligible Attendance for the Consolidated Applications process.

Southwest Georgia S.T.E.M. Charter does not have any Targeted Assistance Title I programs Schoolwide Programs where participation is offered to a select group of eligible Title I students.

ALLOCATIONS AND CARRYOVER

ALLOCATIONS

After receiving notification of the Title I, Part A grant amounts from GADOE, reservations in each budget are set aside for required components such as parent involvement, professional learning, indirect costs, neglected and delinquent, private school per pupil and equitable services, and homeless students. Administrative costs are also part of the reservations, which are not part of the schools per pupil amounts. Typically, requests for lesser amounts are submitted for professional learning for high quality teachers.

RESERVATION OF FUNDS

Professional Development: No Title I schools in Southwest Georgia S.T.E.M. Charter are designated as Priority or Focus. The Georgia's Flexibility Waiver no longer requires 10% set aside for professional learning. In order to promote continuous school improvement, the Southwest Georgia S.T.E.M. Charter will continue to pursue professional development to strengthen best practices in all classrooms.

Homeless Children and Youth: Title I schools are required to set aside funds within their budgets to meet the needs of homeless children and youth. The Federal Programs Director and the Homeless Liaison, annually determines the amount of funds needed, if any, to adequately meet the needs of homeless students. The Federal Programs Director trains school personnel including: counselors, as well as clerks, teachers, and principals to identify children in homeless situations. A home survey is also used to identify homeless students. The Homeless Liaison is consulted if any staff member suspects that a student qualifies for homeless services. The Federal Programs Director then investigates the situation and makes the ultimate determination on whether or not students qualify. When a student does qualify, notes are maintained related about the situation and a memo is sent to the Student Information Coordinator and the Director of Food and Nutrition. Homeless set aside funds are used to purchase needed supplies and for tutoring services for identified homeless students on an as needed basis.

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

Private Schools: N/A for Southwest Georgia S.T.E.M. Charter. If Southwest Georgia S.T.E.M. Charter ever has a Private School, choose to participate all Title I regulations for private school participation will be followed. The private school worksheet would be completed and attached to the Consolidated Application to ensure that all reservations related to parental involvement, instructional lead teachers, professional learning, and paraprofessionals have been reserved.

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

CARRYOVER

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

Monthly budget sheets are monitored regularly throughout the year and calculations are made from these near the end of the school year to determine that no more than 15% will be carried into the following year. The Federal Program Director tracks the spending of each program/school through the year via budget sheets. At the end of the school year, carryover information is updated and reviewed.

Southwest Georgia S.T.E.M. Charter does not receive \$500,000.00 in Title I funds and does not have a FLP so this does not apply:

To determine the amount of carryover for parental involvement and FLP, the Title I Director first obtains a copy of the previous year's set aside page of the consolidated application.

The Title I Director obtains an expenditure report/ completion report from the CFO to verify expenditures for parental involvement and FLP. The Title I Director compares the required amount to the expended amount. If less funds have been expended than required, that is the carryover. If equal or more funds have been spent, then no carryover is required.

EQUITABLE SERVICES TO PRIVATE SCHOOLS

Southwest Georgia S.T.E.M. Charter does not serve any private schools.

Section 9: PARENT INVOLVEMENT POLICY AND PROCEDURES

PARENT INVOLVEMENT POLICY OVERVIEW

Southwest Georgia S.T.E.M. Charter has an on-going commitment to our Title I parents. Parental involvement is defined as the participation of parents in regular, two-way, and meaningful communication involving student academic learning and other school activities. Our goal is to ensure that our Title I parents and their children receive extraordinary services and assistance that will lead to improved academic achievement. The district recognizes that parents are an integral part of a child's success in school, starting with the concept of being the child's first teacher. As a

conduit for their children's success, the district will assist parents of all socioeconomic levels in solidifying their ongoing commitment to their child's success.

PARENT NOTIFICATION AND COMMUNICATION IN AN UNDERSTANDABLE AND UNIFORM FORMAT

When parents mark on the enrollment form that they need correspondence in another language, to the extent practical, efforts are made to provide either written support or support through an interpreter. The Title III Director supports these efforts as well as school staff who are fluent in multiple languages. TransAct and Google Translate are available and can be used to translate documents. Furthermore, all parent communication is written in a format so that the content is easily understandable.

PARENT NOTIFICATIONS OF SCHOOL DESIGNATION STATUS

The District follows the guidelines for parent notifications according to the guidance set by the Georgia Department of Education to ensure that all Title I schools notify parents in multiple ways, inclusive of a letter sent home to Title I parents, of the schools' designation status under Georgia's ESEA Flexibility Waiver and that such notifications are timely, correct, and provided in appropriate languages, as necessary. The District follows timelines to ensure the timely dissemination of parent notifications. These notices are sent home to parents on the first day of school via First Day of School Packet and/or Student & Parent Handbook and copies are on the website. These procedures must include written directives to the schools for required information to be included in the letter/notification, as well as proper timelines for when communications should be sent out so they are received by parents in a timely manner (at the beginning of the school year). Signs are posted near the front office with designation status.

SCHOOL DESIGNATION STATUS – PRIORITY SCHOOLS

Southwest Georgia S.T.E.M. Charter has no Priority Schools. A school identified as a Priority School receives the support of the School Improvement Division of the GaDOE. This support is through the assignment of a School Improvement Specialist who will work with the school on a regular basis and will bring in other staff to support identified areas for growth. Support for schools needing comprehensive services will be provided by the GaDOE School Improvement Specialists. The LEA signs a three-year Memorandum of Agreement (MOA) with the GaDOE on behalf of Priority Schools. The Memorandum of Agreement outlines a set of non-negotiable actions and interventions required of each Priority School aligned with the turnaround principles. The MOA will be developed during the spring of the year before it is to be signed in the fall.

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

a period of three years. The eight percent mark represents one-half of a deviation above the statewide annual average increase between 2003 through 2011.

SCHOOL DESIGNATION STATUS – FOCUS SCHOOLS

Southwest Georgia S.T.E.M. Charter has no Focus Schools. In Focus schools, the GaDOE works in collaboration with the LEA to analyze student achievement data to identify the largest gaps between groups of students. Based on the analysis of data, the LEA and the GaDOE determine the interventions required of each Focus School. LEAs sign a Memorandum of Agreement (MOA) with the GaDOE on behalf of Focus Schools. The MOA outlines a set of non-negotiable actions and interventions required of each Focus School.

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

Any school identified as a Priority or Focus School, will attend all required training throughout the year as prescribed by GaDOE. Such training will include the *Summer Leadership Academy* and other scheduled trainings held at RESA or other state locations.

ESEA PUBLIC SCHOOL CHOICE

Southwest Georgia S.T.E.M. Charter is a State Commissioned Charter School with a State-wide attendance zone.

FLEXIBLE LEARNING PROGRAM (FLP)

(N/A for Southwest Georgia S.T.E.M Charter)

Southwest Georgia S.T.E.M. Charter has no Priority Schools has no Priority or Focus Schools. All Title I Priority and Focus Schools must offer a Flexible Learning Program (FLP). In addition, all Title I Priority and Focus Schools must develop a written plan that outlines how the Title I Priority and Focus Schools will implement their FLP plan. The FLP plan must be approved by GaDOE's Title Programs Unit prior to implementation. All Title I Priority Schools and Focus Schools are required to send notices to parents describing the school's status, sharing data and information used to support programming decisions, and explaining how parents may become involved in improving the school.

All Title I Priority Schools are required to set-aside 10% percent of their school's Title I allocation for professional learning. Focus Schools are not required to set-aside 10 percent of their school's Title I allocation for professional learning. However, Focus Schools may set-aside funds for professional learning if the need for professional learning is addressed in the school's Title I schoolwide plan. LEAs are required to set-aside a minimum of 5 percent of the LEA's Title I allocation to implement the LEA's FLP plan in Title I Priority and Focus Schools. Set-asides above the minimum 5 percent requirement may come from the LEA's total allocation or the Priority

Schools' and Focus Schools' allocation and are subject to the equitable services to eligible private school students' requirements (ESEA Section 9401(c)(5)).

TEACHER AND PARAPROFESSIONAL QUALIFICATIONS

Southwest Georgia S.T.E.M. Charter is a State Commissioned Charter School. Therefore, there is a waiver in place which allows for flexibility when hiring and GA DOE certification guidelines are required only for Special Education Teachers and paraprofessionals. Parents are informed of their rights to know the qualifications of their children's teacher. This information is sent home to every parent in the beginning of the year as a part of the Registration Packet. The notice includes the specific contact person and telephone number and email address should parent desire to obtain teaching credentials. This information is also made available through the school system website and other newsletters sent home with students.

HIGHLY QUALIFIED TEACHER EVIDENCE

(N/A for Teachers - except for Special Education Teachers and Paraprofessionals have to be PQ)

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

All notices and information required must be in a uniform and understandable format, including alternative formats upon request and, to the extent practicable, in a language that parents understand. Parents may request and receive information regarding:

- a. Whether the teacher has met state qualifications for the grade levels and subject areas in which the teacher teaches;
- b. Whether the teacher is teaching under emergency or other provisional status;
- c. The baccalaureate degree of the teacher and any other graduate certification or degree held by the teacher and the field or discipline of the certification or degree;
- d. Whether the student is provided services by paraprofessionals.

Principals are required to send a letter to the parents of those students who are taught four or more weeks by a teacher who does not meet PQ status. This is to support effective parent communication.

PARENT INVOLVEMENT PLANS

District and school parent involvement plans are reviewed and revised annually with parents and other stakeholders (teachers, principals, administrators, and other school personnel). The district will hold a meeting for review of the district and school Parent Involvement Plans. All Title I parents, teachers, administrators, and other school personnel in the district will be invited to the meeting to provide input. A notice will be put in the paper and on the web site of the meeting dates. District parents that cannot attend the meeting will be given the opportunity to obtain a copy from the Federal Programs Director or review on the web site and submit input before the final

revisions are approved. The Title I Director will be responsible for collecting the required information (agenda, meeting notes, and sign in sheets). The district will hold the meeting in the summer to revise plans for the next school year. The LEA Parent Involvement Policy checklist will be applied to school plans. Revision dates will be clearly marked on each plan. The Title I Director will review plans during on-site monitoring visits. Plans include activities/workshops that have been identified and requested through the previous year's annual parent involvement survey. School improvement and parent involvement plans are posted on the website, available at the school and hard copies can be requested.

Southwest Georgia S.T.E.M. Charter holds an Annual Title I Meeting. This meeting give parents the opportunity to review and provide feedback on system-wide student data, parent activities, Parent Involvement Plans, Schoolwide Title I Plans, and Comprehensive Improvement Plans. Parents are notified about this opportunity through advertisements in local media, school-level flyers, and/or the system web site. The school district uses the comments provided by parents during the annual review/revision of documents at the Annual Input Meeting and parent engagement meetings. After the school system review/revision process, the Parent Engagement Plan is made available to parents on the district website. Copies are also available in the Media Center and from the Federal Programs Director. Parents are also given the opportunity to provide feedback about Title I programs by completing annual parent surveys. These comments are used by the District when planning parenting programs.

PARENT INVOLVEMENT PLAN DEVELOPMENT PROCESS

Southwest Georgia S.T.E.M. Charter must submit to the Georgia Department of Education (GaDOE) written procedures for the annual review and revision of the District level parental involvement policy to include the person(s) responsible for developing the review and revision, the timeline for review and revision (to ensure it is completed and distributed to all Title I parents prior to November 1st of each year), and how all Title I parents will be notified about the opportunity to provide input into the policy (website, phone call system, invites to meetings, flyers sent home to all parents, parent newsletter announcements). It should also include documentation that will be maintained to ensure that the policy is reviewed and revised jointly with parents and other appropriate stakeholders (copies of invitations, meeting agendas, sign-in sheets, record of parent feedback).

- Person(s) responsible for the review and revisions
- Timeline for review and revisions
- Information on what must be contained in each policy
- How all Title I parents will be notified and invited to provide input into the Parent Involvement Policies (PIP)
- Protocols for procuring and maintaining documentation to illustrate that parents were actively engaged in the revision process
- Southwest Georgia STEM Charter School System's protocol for distributing Parent Involvement Policies to all Title I parents.
- Review and Revisions

Person(s) responsible for reviews:

Federal Programs Director with input from all stakeholders.

1. Schools will utilize the GA DOE “*School Level Parent Engagement Policy*” checklist/rubric to ensure complete compliance to Title I, Section 1118 of the ESEA.
2. The Federal Program Director will utilize the GA DOE “*School Level Parent Engagement Policy*” checklist/rubric to verify that each school has met the requirements of Title I, Section 1118 of the ESEA. This completed document will be filed as documentation for cross-functional monitoring purposes.
3. On the district level, the LEA will utilize both the GA DOE *Parental Engagement Compliance and Parent Notification Checklist*.

Involvement Policy documents to evaluate quality and compliance of the district-level Parent Engagement Policy.

The **timeline** for Parent Engagement Policy to be revised is established on the system’s Federal Programs’ Calendar available to the Superintendent/Principal. The revision process starts in February and is required to be completed and approved by July of each year. Each principal will facilitate the process with the guidance and support of the Federal Programs Director. School and system protocols will require that all parents are contacted using multiple avenues of communication. At a minimum, each school and the school system will be required to:

School-Level/District Level

- **Social Media notification:** Stakeholders will be informed of meeting through a notification on Social Media.
- A notice on the district’s **website** a minimum of two weeks prior to the revision meeting.

DISTRIBUTION OF COMPLETED PLANS

- Once the Parent Engagement Plan is finalized, the district will ensure that the final document is placed on the system website. Screen shots will be taken by the Federal Programs Director as evidence for cross-functional monitoring.
- A hardcopy of the Parent Engagement Plan will be visible and available at all times for parents to access in the Media Center.
- Hardcopies will be available for parents at the Annual Title I Meetings held at each school in the fall of each year.

Plans include system and school improvement plans, parent involvement plans, Title I schoolwide plans, parent-school compacts, comprehensive LEA improvement plan (CLIP), parents’ right to know, complaint procedures, and policy on ethics and fraud, waste and abuse. Parental input into the content of each plan is solicited during multiple meetings throughout the school year but especially at the Annual Title I meeting conducted each fall.

SCHOOL-PARENT COMPACTS

All Title I schools are required to have parent compacts. It is the responsibility of the principal in coordination with the Federal Programs Director to make sure that all compacts are reviewed and revised annually. The review and revision will occur in the summer during our Input meeting, school council meetings, and parent workshops. Revision dates will be clearly marked on each compact. An invitation will be sent home to all parents in the school and meeting dates will be given through Social Media, flyers and through the school's web site. The Federal Programs Director will be responsible for setting up meetings and collecting required information (agenda, meeting notes, and sign in sheets). Parent compacts will include responsibilities for the teacher, parent, and students. Compacts will be distributed to all parties involved for signatures in the fall of the year. Compacts go home with students in the registration packets.

Copies of the signed parent compacts are kept on file. Southwest Georgia S.T.E.M. Charter believes that the public schools belong to the people who create them and that student educational goals should reflect the goals of the community. We affirm and assure the rights of parents to participate in the development of the goals and objectives of the public schools and encourage involvement in all areas of their children's educational experiences.

Schools will utilize the GaDOE "*Shared Responsibilities for High Academic Achievement School-Parent Compact*" rubric located in the GaDOE's "*Systemic Family Engagement: A Comprehensive Guide to Implementing an Effective Title I Parental Involvement Program*", pages 33-34, to ensure complete compliance to Title I, Section 1118 of the ESEA. The Federal Program Director will utilize the GaDOE's "*Systemic Family Engagement: A Comprehensive Guide to Implementing an Effective Title I Parental Involvement Program*", pages 33-34 rubric to verify that each school has met the requirements of Title I, Section 1118 of the ESEA. This completed document will be filed as documentation for cross-functional monitoring purposes.

The revision process starts in spring and is required to be completed and approved before school begins in the fall. The Federal Programs Director will facilitate the process with the support of the Superintendent/Principal. School and system protocols require that all parents are contacted using multiple avenues of communication. At a minimum, each school and the school system will be required to:

1. Send notification to all Title I parents explaining the purpose of the SPC, the process of revisions, the date and time of the meetings for revisions. A notice on the school's website and notification through social media are the means for parent notification for compact revisions.

Distribution of SPCs to parents:

1. Once the SPCs are finalized, the schools will ensure that the final document is placed on the system website in a highly visible location. Screen shots will be taken by the Federal Programs Director as evidence for cross-functional monitoring.
2. A hardcopy of the SPC will be visible and available at all times for parents to access in the Media Center.
3. Hardcopies will be available for parents at the Annual Title I Meetings held at each school in the fall of each year.

3. The Registration Packs will include a copy of the SPC. Schools will retain written documentation, to include student and parent's signatures of receipt. In addition, schools will request parents to return the SPC Acknowledgment Document to the schools upon receipt.

ANNUAL TITLE I MEETING

All Title I schools are required to hold an annual meeting at the beginning of school. The Federal Programs Director will work with the Superintendent/Principal to arrange meeting times and invite all stakeholders to the meeting. The Federal Programs Director will be responsible for collecting and submitting documentation of the required Title I annual meeting, including a copy of the sign in sheet, agenda, and minutes.

In compliance with new state and federal requirements set forth in the spring of 2013, **Annual Title I meetings cannot be held in conjunction with open houses or PATS meetings.** Annual Title I meetings can be held on the same day as other meetings, however, the Title I meeting must have its own agenda, sign-in sheets and minutes. Only after the Annual Title I meeting is completed, can another begin. Meetings are also announced via paper copies to parents, websites, social media and/or local newspaper (at least two modes).

ANNUAL EVALUATION

Process to Collect:

The parent survey is conducted in the spring. In addition, the School Climate Survey is conducted yearly. Survey links are available on our school website for the School Climate Survey and hardcopies are sent home with the last progress report of the year. The surveys are collected and compiled and upcoming parent involvement activities are built from the responses.

Process to Review:

The results of the surveys are shared among several groups of stakeholders, including, but not limited to, parents, school and central office administration, and community stakeholders. All stakeholders are invited to the Input Meeting (summer) and the Annual Title I Meeting (October) to review the results of the surveys while reviewing and revising the schoolwide and parent involvement plans and components.

Actions Taken by LEA to Improve the Quality and Effectiveness of Parent Involvement Policies and Practices:

The Federal Program Director reviews the annual survey as well as the results from the previous surveys during Federal Program Reviews with building level administration. Additions/deletions/revisions are discussed and agreed upon during this meeting. Formatting and revisions are made after the meeting and then sent back for comment. If no further suggestions are made, the surveys are sent to schools to print and send to parents without being embedded in other materials.

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

Timeline:

- September – Survey links will be placed on the school website and open during the window allowed by the State for the School Climate Surveys.
- October – Annual Title I Meeting
- April – Title I Surveys sent home with all students with their last progress report.
- May – Review data
- August – Input Meeting

Parent Survey data/results will be available to stakeholders no later than one month after the close of the survey.

CAPACITY FOR PARENT INVOLVEMENT

Information is provided to school personnel and parents on how to build parent capacity through presentations made during meetings, through response to parent needs on surveys, through information received from the GaDOE Parent Engagement department, and through student handbooks, newsletters/flyers.

The Federal Programs Director and the Superintendent/Principal considers and plans based on the six requirements for building capacity by answering the following questions:

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

PARENT RESOURCE CENTERS

The Parent Resource Center is located in the front foyer. A variety of materials and resources are available to parents as handouts. Schools are required to notify parents of the availability of the resources in the parent resource center. This is typically achieved through a flyer and/or websites and includes information on the types of resources available in or through the resource center.

REQUIRED 1% SET ASIDE FOR PARENTAL INVOLVEMENT
(N/A to Southwest Georgia S.T.E.M. Charter)

If required of Southwest Georgia S.T.E.M. Charter, the plan may look like this:

Parental Involvement: Principals have the option of expending the 1% in Parent Involvement funds or submitting them back to the system level. Principals typically decide to direct those funds to a district level parent involvement activity/project by signing a District-wide Parent Activity Assurance form. The funds are used at the district level to fund agenda handbooks and parent meeting materials for all schools.

Timeline: Southwest Georgia S.T.E.M. Charter has developed a timeline for all documents associated with Title I & Title II funding. The timeline is provided for the Superintendent/Principal. In addition, SGSC provides a Federal Programs checklist to all system and building level administration.

Implementation Timeline:

- All schools will begin the revision process for their *Parent Engagement Policies, School-Parent Compacts, Schoolwide Plans and School Improvement Plans* no later than April.
- The revision process will require that parents are notified and invited to be part of the revision process.
- Schools will provide documentation of invitations (flyers, website printouts, marquee pictures, newspaper notification, etc.). A minimum of two different notification methods will be used.
- Schools will provide sign-in sheets indicating parent involvement in meetings where the above mentioned plans were discussed and revised.
- The revision discussions will include the discussions on the “how” the 1% set aside for parent involvement will be spent in each school. (Supported by agendas, minutes and sign-in sheets).

Although the system has established a definite timeline for revisions to start and end, it is understood that the evaluation and revision process is a dynamic entity that occurs on an ongoing basis throughout the school year. The school district will follow the same timeline for the evaluation and revision of the District’s Parent Engagement Policy.

Person/Persons Responsible for Implementation:

- School-level principals are ultimately responsible to ensure that each school follows all rules, policies, procedures and protocols as outlined in the *Federal Programs Procedures and Internal Controls Handbook*, BOE policies, state and federal policies.
- Principals will ensure that all documentation described within this section of the corrective action plan is collected and submitted as required by this plan to the Federal Programs Director.
- Principals will uphold the intent of all regulations, policies, procedures and protocols as outlined in the SGSC Corrective Action Plan, *SGSC Federal Programs Procedures and Internal Controls Manual*, and all other policies outlined in state and federal publications.
- Director of Federal Programs will monitor the compliance to all policies, procedures and protocols both on the school-level and the district level. All submitted documents will be reviewed for accuracy and compliance to local, state and federal policies.

- Revisions will be requested by the Federal Programs Director when submitted documents do not meet the expectations set forth in the rubrics that apply to the Parent Engagement Policy, SPC, SWP, etc.
- If needed, noncompliance issues will be directed to the superintendent to ensure total compliance is achieved.

SCHOOL IMPROVEMENT PLANS

School Improvement Plans are created each spring and finalized during the summer for the following school year. During the Annual Input Meeting, representatives from each grade level, content area, and department, as well as administration and parents meet to review the existing plan and revise/develop a plan for the upcoming year. Once the plans have been reviewed, revisions are made. The final plans are posted to the web site and made available in the Media Center for all stakeholders. Stakeholders are notified that suggestions for revisions are accepted at any time. Suggestions are submitted to the Federal Programs Director for consideration at review meetings. It is through this process that the LEA oversees the development of school improvement plans.

Section 10: SCHOOL IMPROVEMENT 1003(A) INTERVENTIONS **(N/A to Southwest Georgia S.T.E.M. Charter)**

If required, the following guidelines would be followed:

MONITORING OF SCHOOL IMPROVEMENT

All schools conduct Title I school-wide programs. This allows all children and all parents an opportunity to have equal access to all related Title I assistance. The LEA utilizes one district School Improvement Specialist to build capacity and support the school improvement process in all schools. All schools within the LEA are involved in school improvement efforts through the work of the LEA, the RESA, and GaDOE. The School Improvement Specialist works with schools to implement practices that have proven effective with improving schools. The District School Improvement Specialist, along with the GaDOE, establishes clear expectations for personnel as they systemically support continuous improvement in all schools.

REVIEW AND APPROVAL OF SCHOOL IMPROVEMENT AND SCHOOL-WIDE PLANS

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

parents to develop a system improvement plan. It is through this process that the LEA oversees the development of school improvement plans.

PROFESSIONAL DEVELOPMENT, ANALYZING DATA, TECHNICAL SUPPORT AND ASSISTANCE

System leaders support schools in developing, revising, implementing and coordinating school improvement and schoolwide plans during school team meetings. During the meetings, data is analyzed to identify and develop solutions to challenges related to instructional strategies, parent involvement, professional learning, and budgets. Professional learning is directly aligned with the needs of the students.

MONITORING USE OF FUNDS

The Federal Programs Director meets with each school monthly to review and provide recommendations for budgeting decisions related to school improvement funds.

Section 11: SCHOOL IMPROVEMENT 1003(g)(SIG) **(N/A to Southwest Georgia S.T.E.M. Charter)**

School Improvement Grants (SIG), authorized under section 1003(g) of Title I of the Elementary and Secondary Education Act of 1965 (Title I or ESEA), are grants to State educational agencies (SEAs) that SEAs use to make competitive sub-grants to local educational agencies (LEAs) that demonstrate the greatest need for the funds and the strongest commitment to use the funds to provide adequate resources in order to raise substantially the achievement of students in their lowest-performing schools. The Southwest Georgia STEM Charter School is currently receiving SIG 1003(g) funds. Quarterly reviews are scheduled and completed by the regional Lead School Improvement Specialist. Annual fiscal monitoring is completed by GaDOE fiscal analysts.

Section 12: SERVICES FOR HOMELESS CHILDREN AND YOUTH

The Federal Programs Director/Principal and Superintendent works very closely to assure students receive needed services. Money is set-aside in the Title I budget for Homeless.

IDENTIFICATION

The Federal Programs Director works with the school administration and data clerk in the registration process to identify homeless children. The LEA also coordinates with DFACS and other agencies to identify its homeless children. The Federal Programs Director assesses related needs of the homeless children and youths and plans strategies to meet those needs. Case study information is used to identify related needs such as a need for personal school supplies or tutoring. To identify the educational needs of the homeless children, Southwest Georgia S.T.E.M. Charter uses attendance, discipline, and demographic data, as well as grades and achievement test results. Available data and information is used to produce a summary of needs. The Federal Programs Director works with the administration, teachers and staff to provide guidance/direction in reference to not isolating or stigmatizing homeless children in their individual teacher handbooks. The Special Education Director collaborates with other agencies in order to

appropriately identify homeless children in need of special education and related services through Child Find activities.

PROGRAM PROCEDURES

- The district is responsible for identifying a homeless liaison.
- Homeless students will be identified based on the definition prescribed by McKinney-Vento Homeless Assistance Act and via a numeric code in the district's student information system.
- All staff in the district is trained in the identification and recruitment of homeless students.
- The homeless liaison will provide training and/or information for all district level and school support staff having contact with homeless students.
- All principals will receive the training and/or information on the identification and needs of homeless students.
- All schools will display flyers, brochures, and posters that identify the Homeless Liaison contact information.
- Services for homeless students (tutoring, etc.) will be evaluated based on student academic achievement if students are ever identified as homeless.

SCHOOL SELECTION

Southwest Georgia S.T.E.M. Charter is one school. Therefore, school selection is not applicable.

ENROLLMENT

Enrollment of homeless students occurs at the appropriate school to which they are assigned based on their grade level. Administration and the data clerk along with the Federal Programs Director and the Homeless Liaison are trained and attentive to the identification of homeless students during the enrollment process. Additionally, students and/or parents have an opportunity to mark "Homeless" on their free/reduced application. Applications marked "Homeless" are immediately submitted to the Homeless Liaison for further investigation.

INFORMATION DISSEMINATION

The Federal Programs Director and the Homeless Coordinator and/or Principals provide information to faculty and staff on the Homeless Program annually in the fall. The Federal Programs Director distributes posters and brochures in the front office and Parent Involvement Resource Room in each school. Posters and brochures are also distributed to the community at DFACS, the Randolph County Health Department, and other business throughout the community.

TRANSPORTATION

As with all students served at Southwest Georgia S.T.E.M. Charter, transportation is provided for homeless students.

DISPUTES

If a dispute arises over any issue covered in your policy, the homeless child or unaccompanied youth shall be immediately admitted to the school in which enrollment is being sought by the family or unaccompanied youth, pending final resolution of the dispute.

Section 13: FOSTER CARE TRANSPORTATION PLAN

Foster Care students will be admitted to Southwest Georgia S.T.E.M. Charter and will be provided transportation to the school from our hub stops.

Section 14: SERVICES FOR NEGLECTED AND DELINQUENT CHILDREN

(N/A to Southwest Georgia S.T.E.M. Charter)

The purpose of Title I, Part D is to improve educational services for children and youth in local and state institutions for neglected or delinquent children and youth so that such children and youth have the opportunity to meet the same challenging state academic content standards and challenging state student academic achievement standards that all children in the state are expected to meet. The purpose is also to provide such children and youth with the services needed to make a successful transition from institutionalization to further schooling or employment and to prevent at-risk youth from dropping out of school, and to provide dropouts, and children and youth returning from correctional facilities or institutions for neglected or delinquent children and youth, with a support system to ensure their continued education. Currently, there are NO neglected and delinquent institutions within Randolph County.

In the event a neglected and delinquent institution opens within the county, Randolph County School System will serve these students using funds set aside in the Title I budget for neglected institutions.

- (a) The Title I Director will work directly with the N & D institution to ensure that students are receiving needed services by meeting with house parents at least annually, more often as needed.
- (b) Meeting minutes, agendas, collaborative planning, emails, phone logs will be maintained by the Federal Programs Director.
- (c) Equipment will be inventoried annually.
- (d) All staff will be trained annually on meeting the needs of neglected students.

CLASS SCHEDULES AND CALENDAR

If N & D students enter our school system, they will attend school on the campus of the Southwest Georgia S.T.E.M. Charter and follow the same academic calendar and schedules as all students in the school system.

PARENTAL INVOLVEMENT

If N & D students enter our school system, they will attend school on the campus of the Southwest Georgia S.T.E.M. Charter. Therefore, the Parental Engagement Plan at each school serves as the plan for the families that house neglected students. In addition, house parents of neglected

students will receive the same invitations to Parental Engagement activities as all other students in the school system.

Section 15: PREVENTION AND INTERVENTION PROGRAMS FOR CHILDREN WHO ARE NEGLECTED, DELINQUENT, OR AT-RISK

Southwest Georgia S.T.E.M. Charter does not have any state N&D facilities at this time.

Section 16: TITLE VI, PART B – RURAL AND LOW INCOME **(N/A to Southwest Georgia S.T.E.M. Charter)**

PURPOSE

The Rural Education Achievement Program (REAP) is designed to assist rural school districts in using federal resources more effectively to improve the quality of instruction and student academic achievement.

USE OF FUNDS

An eligible LEA may use RLIS funds for:

1. Teacher recruitment and retention, including the use of signing bonuses and other financial incentives;
2. Teacher professional development, including programs that train teachers to use technology to improve teaching and to train teachers of students with special needs;
3. Educational technology, including software and hardware, that meets the requirements of Part D of Title II;
4. Parental involvement activities;
5. Activities authorized under Part A of Title I;
6. Activities authorized under Title III

Section 17. TITLE II, PART A – TEACHER AND LEADER EFFECTIVENESS

PURPOSE

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

EQUITY BELIEF STATEMENT

Southwest Georgia S.T.E.M. Charter believes that all students should have equitable opportunities to quality instructional programs with regard to professionally qualified teachers, experience of teachers, teachers' ability to meet the diverse learning needs of all students, and class size. Southwest Georgia S.T.E.M. Charter strives to recruit, prepare, train and support high-quality teachers, paraprofessionals and leaders in our school system. We are also focused on developing school and district level improvement plans with measureable objectives that will ensure that all teachers teaching core academic subjects are and remain professionally qualified.

ANNUAL NEEDS ASSESSMENT PROCESS

The Southwest Georgia S.T.E.M. Charter conducts its annual needs assessment in the spring/summer of each year. The survey is open to all administrators, teachers, and paraprofessionals and addresses the following equity components: professionally qualified status of teachers and paraprofessionals, student access to experienced and effective teachers and leaders, teacher ability to meet the diverse needs of students, student access to comparable class sizes, and the retention and recruitment of professionally qualified and effective teachers and leaders. In addition, input on areas in need of improvement is solicited from school and district leaders by surveys, data analysis, team meeting and suggestions from stakeholders. Feedback is also solicited from parents during the annual Title I meeting, Input meeting, the website and parent engagement activities. Information gathered from these various sources is discussed and decisions made on areas of focus by the administration, faculty and staff, and other stakeholders who attend meetings and offer suggestions.

EQUITY PLAN

The Southwest Georgia S.T.E.M. Charter Equity Plan for Title II-A is revised each May/June using needs assessment survey and other forms of current data. The Equity Plan serves as the plan detailing professional learning and effective equitable practices among teachers. School and system leaders, as well as, community and parent stakeholders are involved in the revision process. As the Equity Plan is revised, it is shared with the faculty and staff. The Federal Programs Director seeks input from stakeholders (administrative staff, teachers, community business partners, and parents) for revisions. Meeting agendas and sign-in sheets are maintained as evidence and documentation of stakeholder involvement in the revision process.

PRIORITIZATION OF NEEDS

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

AUTHORIZED USE OF FUNDS

Title II funds can be used for recruitment, retention, professional development, and class size reduction. Title II-A funds must be used to *supplement, and not supplant*, non-Federal funds that would otherwise be used for activities authorized under Title II-A.

It is presumed supplanting has occurred in the following circumstances:

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

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

PROFESSIONAL LEARNING

Professional Learning must be of high quality, sustained, intensive, and classroom-focused in order to have a positive and lasting impact on classroom instruction and the teacher's performance in the classroom. Southwest Georgia S.T.E.M. Charter will connect all Title II, Part A funded activities to a review of evidence based research. "High quality professional development" will include activities "that advance teacher understanding of effective instructional strategies that are based on evidence." Southwest Georgia S.T.E.M. Charter will base professional learning on the identified "gaps" as provided by the GaDOE which are evidence based instructional strategies. It must address one or more of the annual LEA prioritized needs. Finally, professional learning must focus on increasing the ability of the teaching staff to help all students achieve high academic standards, or the school administrative staff to lead their schools' efforts to increase student academic achievement.

PROFESSIONALLY QUALIFIED TEACHERS

Southwest Georgia S.T.E.M. Charter is a State Commissioned charter school with a waiver which does not require us to hire professionally qualified teachers except in the area of Special Education and paraprofessionals. All efforts are made to hire professionally qualified teachers.

In the event that this becomes a requirement in the future, Southwest Georgia S.T.E.M. Charter will follow the guidelines from the State which at one time was this:

Southwest Georgia S.T.E.M. Charter will systematically monitor the PQ status of its teachers based on demographics and a written remediation plan is created for each teacher who does not hold a valid clear renewable certificate or that is not professionally qualified. The plan is monitored and supported with Title II-A funds.

RECRUITMENT, PLACEMENT, AND RETENTION OF PROFESSIONALLY QUALIFIED, EFFECTIVE TEACHERS AND LEADERS

Southwest Georgia S.T.E.M. Charter is a State Commissioned charter school with a waiver which does not require us to hire professionally qualified teachers except in the area of Special Education and paraprofessionals. All efforts are made to hire professionally qualified teachers.

The Superintendent/Principal considers the recruitment, placement, and retention of professionally qualified, effective teachers and leaders. The topic is also discussed at part of a review of data

from the system annual needs assessment during administration meetings held throughout the year. Specifically, each principal is required to report the level of retention from the previous school year and improvement with the placement of professionally qualified, effective teachers for the upcoming school year. System and school goals are then created or adjusted for the next school year.

TEACHER EXPERIENCE AND EFFECTIVENESS EQUITY

Teacher effectiveness is measured using two methods. First, walkthroughs are conducted at each school by administration to gather data that can be used to guide professional learning activities. Secondly, administrators conduct two or six (depending on the experience of the teacher and/or prior observations) formal observations as part of the Georgia Teacher Keys Effectiveness System (TKES). Reports are generated in the Infinite Campus platform as observations occur and professional learning is planned to meet the specific needs of teachers.

Identified inequities in teacher experience will be addressed at the school and classroom level by re-assigning personnel and students as necessary to ensure that all students have equitable access to experienced teachers. During administrative meetings, schedules and class rosters are reviewed to ensure compliance.

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

CLASS SIZE EQUITY

The LEA will address inequities in class size across and within schools by re-assigning students as necessary to achieve equity. During administrative meetings, class size equity is discussed and reviewed to ensure compliance.

MEETING THE DIVERSE NEEDS OF STUDENTS

A minimum two observations are conducted by school administrators as part of the system's implementation of the Teacher Keys Effectiveness System (TKES) to ensure that all classrooms follow the guidelines of a standards-based classroom. One of the standards assessed is the use of differentiation to meet the diverse needs of students. The data from these focus walks is reviewed and used to plan professional learning initiatives.

PROCEDURES FOR PQ

The Title I office will maintain a list that includes the status of all Title I paid staff. Southwest Georgia S.T.E.M. Charter ensures that Title II funded staff are PQ, when applicable.

PROCEDURES FOR PRINCIPAL'S ATTESTATIONS

Title I office will remind principals to sign their attestation forms for all Title I paid staff. Forms will be signed in September. This information will be maintained in the Title I office.

PERIODIC CERTIFICATIONS

Periodic certifications for all Title II paid staff takes place after-the-fact. The process takes place twice yearly. The first one for the year takes place after the first semester and the second periodic certification takes place after the second semester. The forms are signed and kept on file in the Title I office. A Periodic Certification Form that is allowed to meet the OMB Circular A-87, Attachment B, Paragraph 8.h.(3) (codified in 2 CFR Part 225) requirement that all 100% paid Title II employees must sign a Periodic Certification semi-annually was implemented beginning 2013-2014. The form must be signed by a supervisory official having first-hand knowledge of the work performed by the employees listed on the form and must still be completed semi-annually.

PROCEDURES FOR HIRING INSTRUCTIONAL PARAPROFESSIONALS

Paraprofessional vacancies are posted on the Teach Georgia webpage. A job description is available upon request. Paraprofessional Education Requirements are listed, including:

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

This ensures that the applicants have met the minimum qualifications to be Professionally Qualified. PQ applicants are then eligible to interview. The Superintendent/Principal makes recommendations to the Board of Education for employment, and hired candidates are fingerprinted, complete a background check and other employment paperwork.

PROCEDURES FOR PARENT NOTIFICATION OF NON PQ

Principals will adhere to parent notification requirements for non-PQ staff. Copies of the parent letters will be given to the Federal Programs Director.

Section 18: TITLE III: ENGLISH TO SPEAKERS OF OTHER LANGUAGES

PURPOSE

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

STUDENT ASSESSMENT AND ENROLLMENT PROCEDURES

Student participation and progress in the EL program is measured using the WIDA ACCESS Placement Test (W-APT) for kindergarteners and the ACCESS exam for students in grades 1-12. All students enrolling in Southwest Georgia STEM Charter School System are surveyed to determine language background other than English. EL instructional support is provided after a student qualifies according to the WIDA-ACCESS Placement Test (W-APT). Eligible students are then assigned to additional services based on need. English Learners (ELs) are assessed annually on the state-adopted English proficiency measure (ACCESS) to determine continued eligibility (ACCESS=Assessing Comprehension and Communication in English State-to-State).

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

Southwest Georgia S.T.E.M. Charter serves EL students through a collaborative model with ESOL endorsed teachers.

EXIT GUIDELINES

According to GaDOE guidelines, "In order to exit language assistance services, a Kindergarten student must score an Accountability Composite Proficiency Level (CPL) of 5.0 or higher with no individual domain score less than 5.0. Kindergarten students who do not score an Accountability CPL of 5.0 or higher and who have any individual domain scores less than 5.0 are not eligible to exit language assistance services. Using the Language Assessment Conference (LAC) process to exit Kindergarten students who do not meet the specified exit criteria is not an option.

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

In the absence of a state-mandated reading assessment at the high school level, an English / Language Arts End of Course Test score or English / Language Arts High School Graduation Test score will be utilized in lieu of the reading assessment. In the absence of an English/Language Arts

EOCT score in high school, a district may choose to utilize an alternate assessment approved by the district.

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

FUNDING

While the Southwest Georgia S.T.E.M. Charter does not receive direct funding for EL students, the school system is part of a consortium of districts with small EL populations. Funds are available through the consortium to purchase instructional materials and resources for the EL program. Specific requests are made to the Federal Programs Director for initial approval. After review, requests are submitted to consortium personnel for approval prior to ordering.

PROFESSIONAL LEARNING

Administrators meet with regular education teachers of EL students to ensure understanding of the WIDA standards. The counselor will also provide WAPT and ACCESS scores for every student and assist teachers with understanding appropriate expectations based on these scores and the student's level of language acquisition. The results of the annual needs assessment will be used to determine professional learning priorities. GaDOE ESOL staff will be contacted to provide training, if needed.

PROGRAM EVALUATION AND ACCOUNTABILITY

The success of the ESOL instructional program will be measured by analyzing the results of ACCESS and other state mandated tests. As a result of this analysis, differentiated instructional decisions will be made for individual students, including adjusting services if indicated. The yearly summary report will describe the progress EL students have made in language acquisition and meeting specified annual content goals for EL subgroups. The report will also include the number and percentage of EL students attaining English proficiency. Finally, the report will include content area mastery of monitored students. The Title III Liaison/Counselor will update all student records and summary data.

MAINTAINING ACADEMIC AND ASSESSMENT RECORDS

Academic and assessment records will be maintained for EL students according to state and federal record retention schedules.

Section 19: TITLE I, PART C – MIGRANT EDUCATION PROGRAM (MEP) SERVICES

The Southwest Georgia S.T.E.M. Charter uses the occupational survey provided by the MEP coordinator to identify migrant students. A Federal Programs Director notifies the Migrant Educational Program (MEP) State staff who makes contact with each migrant family to determine case-by-case eligibility and needs. Migrant students are evaluated academically the same as other students in the system to determine academic needs. All migrant students are eligible for Title I services, and receive appropriate Title I services. In addition a referral is made to student services to indicate that additional services may be needed from that department. Additionally, specific activities to address the needs of migratory families are provided.

Such activities shall include informing children and families of, or helping such children and families gain access to other education, health, nutrition and social services. Parent outreach is provided in a language that is understood by the family if at all possible. The DOE TransAct program and Google Translate is used for translation as well as a private consultant or the high school Spanish teacher when needed. All parents are presented information on ESOL, special education, gifted, and other educational programs.

Section 20: INDIVIDUALS WITH DISABILITIES EDUCATION (IDEA) **SEE THE IDEA MANUAL**

ACADEMIC ACHIEVEMENT AWARDS PROGRAM

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

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

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

Using the free / reduced meal (FRM) data for the fiscal year previous to the award, all schools in the state are listed in descending order according to FRM count. The schools are then divided into four equal parts resulted in four quartiles. The cutoff point between higher poverty schools and

lower poverty schools is then determined by starting with the highest FRM percentage school and moving down the ranked list to the last school in the top quartile. This quartile is the list of higher poverty schools. The second, third, and fourth quartiles are the lower poverty schools. Schools identified as a Highest-Performing Reward School or as a High-Progress Reward School in the higher poverty schools quartile draw from the 75 percent fund. Schools identified as a Highest-Performing Reward School or as a High-Progress Reward School in the lower poverty schools quartiles draw from 25 percent fund. The Georgia Department of Education (GaDOE) anticipates that there will be a total of 234 schools eligible for Reward School status.

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

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

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

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

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

CHARTER SCHOOLS

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

SPECIAL STATE CHARTER SCHOOLS

Southwest Georgia S.T.E.M. Charter is a state commissioned charter school.

Appendix A: Complaint Procedures

A. Grounds for a Complaint

Any individual, organization, or agency (“complainant”) may file a complaint with Southwest Georgia S.T.E.M. Charter (SGSC) if that individual, organization, or agency believes and alleges that SGSCV is violating a federal statute or regulation that applies to a program under the Title I, Part A of the Elementary and Secondary Education Act of 1965 (ESEA). The complaint must allege a violation that occurred not more than one (1) year prior to the date the complaint is received, unless a longer period is reasonable because the violation is considered systemic or ongoing.

B. Federal Programs for Which Complaints Can Be Filed

- Title I, Part A: Disadvantaged Children, Academic Achievement Awards, Schoolwide Programs
- Title I, Part C: Migrant Education Program
- Title I, Part D: Programs for Neglected or Delinquent Children
- Title II, Part A: Teacher and Leader Effectiveness
- Title II, Part D: Enhancing Education Through Technology
- Title III, Part A: English to Speakers of Other Languages
- Title VI, Part B, Rural Education Achievement Program
-

C. Complaints Originating at the Local Level

As part of its Assurances within the ESEA program grant applications and pursuant to Section 9306 within the Title I, Part A of the Elementary and Secondary Education Act of 1965 (ESEA), an LEA accepting federal funds must have local written procedures for the receipt and resolution of complaints alleging violations of law in the administration of covered programs. Therefore a complaint should not be filed with the Georgia Department of Education until every effort has been made to resolve through local written complaint procedures. If the complainant has tried to file a complaint with the Southwest Georgia STEM Charter School Schools to no avail, the complainant must provide the Georgia Department of Education written proof of their attempt to resolve the issue with Southwest Georgia S.T.E.M. Charter.

D. Filing a Complaint

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

- A statement that Southwest Georgia S.T.E.M. Charter has violated a requirement of a Federal statute or regulation that applies to an applicable program.
- The date on which the violation occurred.
- The facts on which the statement is based and the specific requirement allegedly violated (include citation to the Federal statute or regulation).
- A list of the names and telephone numbers of individuals who can provide additional information.
- Whether a complaint has been filed with any other government agency, and if so, which agency.

- Copies of all applicable documents supporting the complainant's position.
- The address of the complainant.

The complaint must be addressed to:

Amy J. Sammons, Federal Programs Director, Southwest Georgia S.T.E.M. Charter, 185 Pecan Street, Shellman, Georgia 39886

Once the complaint is received by the Federal Programs Director, it will be copied and forwarded to the Superintendent.

E. Investigation of Complaint

Within ten (10) days of receipt of the complaint, Southwest Georgia S.T.E.M. Charter will issue a Letter of Acknowledgement to the complainant that contains the following information:

- The date Southwest Georgia S.T.E.M. Charter received the complaint.
- How the complainant may provide additional information.
- A statement of the ways in which Southwest Georgia S.T.E.M. Charter may investigate or address the complaint.
- Any other pertinent information.

If additional information or an investigation is necessary, SGSC will have sixty (60) days from receipt of the information to complete the investigation and issue a Letter of Findings. If the Letter of Findings indicates that a violation has been found, a timeline for corrective action will be included. The sixty (60) day timeline may be extended if exceptional circumstances occur. The Letter of Findings will be sent directly to the complainant, as well as the other parties involved.

F. Right of Appeal

If an individual, organization, or agency is aggrieved by the final decision of Southwest Georgia S.T.E.M. Charter, that individual, organization, or agency has the right to request review of the decision by the Georgia Department of Education. For complaints filed pursuant to Section 9503 (20 U.S.C. 7883, complaint process for participation of private school children), a complainant may appeal to the Georgia Department of Education no later than thirty (30) days from the date on which the complainant receives the Letter of Findings. The appeal must be accompanied by a copy of the Southwest Georgia S.T.E.M. Charter's decision and include a complete statement of the reasons supporting the appeal.