***Clinch County Schools***

***Federal Program Procedures***



***REVISED:***

***April 11, 2022***

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**Summary of System**

**Clinch County Elementary School: Clinch County Middle School**

 Title I Schoolwide Program Title I Schoolwide Program

 Grades Pre-K through 4 Grades 5-7

 Enrollment – 544 Enrollment - 292

 CEP School CEP School

*Clinch County Elementary School and Clinch County Middle School are located in the same facility. The schools are served by one principal and two assistant principals, but remain as two schools.*

**Clinch County High School:**

 Grades 8-12

 Enrollment – 402

**Federal Programs Staff**

|  |  |
| --- | --- |
| **Dr. Lori James** | **Superintendent** |
| **Denise Brown** | **Assistant Superintendent/Title II/Title IV/ Title V/ ESSER** |
| **Lori Register** | **Title I, A/Parent & Family Engagement**  |
| **Alison Smith** | **Title I, C/Title III/Migrant/IDEA** |
| **Renee Harris** | **Title IX A-McKinney Vento Act/Homeless Liaison** |
| **Liane Register** | **Finance Director** |

**THIS ENTIRE DOCUMENT DESCRIBES THE REQUIREMENTS FOR**

**CLINCH COUNTY SCHOOLS FEDERAL PROGRAMS**

**Title I, Part A; Title I, Part C: Title I, Part D, Title II, Part A; Title III, Title IV, Title VB, Title IX: McKinney Vento Act, IDEA, and ESSER.**

 **The information included in this document is pertinent to Federal Programs. Procedures and processes (i.e., budgeting, requisitions) are the same; however, the programs are coded and tracked separately.**

**LEA Monitoring of Schools and Programs**

**Monitoring Procedures for Title I, Part A; Title I, Part C: Title I, Part D, Title II, Part A; Title III, Title IV, Title VB, Title IX: McKinney Vento Act, IDEA, and ESSER.**

The information contained in this handbook will promote district consistency in effective and efficient operations as Federal Program Directors, Coordinators, and staff seek to carry out official federal program duties and responsibilities. The Georgia Department of Education (GaDOE) provides Local Educational Agencies (LEAs) extensive guidance on the over-arching requirements for all federal programs via the on-site monitoring document that is used to ensure that LEAs are meeting all statutory requirements of the programs listed above. These specific requirements from the GaDOE document were used to create this handbook.

The Federal Programs Coordinator, with assistance from program directors, conducts self-monitoring of schools and programs sufficient to ensure compliance with federal program requirements. When the system must use self-monitoring, the Federal Programs Coordinator and Directors for Title I, Part A; Title I, Part C; Title I Part D; Title II, Part A; Title III; Title IV, Title V-B, IDEA, Title IX: McKinney Vento Act, and ESSER use the self-monitor checklist to verify all system data.

At the present time, the Clinch County School System does not participate in Title I, Part D; therefore, no self-monitoring for that program takes place. The Federal Programs Coordinator stays in direct contact with the program directors and works collaboratively with them to complete the consolidated application and both the self-monitoring and on-site monitoring required by the federal programs.

The Title IX McKinney-Vento Program is monitored as follows: In the Clinch County School System, a Student Residency Questionnaire is used to help address the McKinney-Vento Act. Information (packets, brochures, posters, etc.) received from The National Center for Homeless Education at Serve is placed in our schools to help inform our parents/students about the McKinney-Vento Act. All staff members complete the McKinney-Vento module through the Compliance Director. If a student is identified as homeless, the homeless director provides as much technical assistance as possible. Other agencies that might be able to provide services to homeless students are also contacted. Presently, our school system offers after school services and/or summer school services to at-risk students, including the homeless.

The Federal Programs Coordinator, Directors, and other personnel undergo training from GaDOE and other sources to maintain proficiency in federal program compliance requirements. The directors receive technical assistance from federal programs personnel at the Department of Education’s annual Federal Programs Conference and other federal program conferences as well as at regional and local technical assistance meetings. On-going training to keep abreast of timelines and new guidance occurs through email and phone calls with the area Title I Education Program Specialist and other federal program specialists. The Federal Programs Coordinator and all other program directors will then have the necessary skills and knowledge to provide on-going technical assistance to the staff at the Elementary, Middle, and High Schools.

The Federal Programs Coordinator and Directors begin working with the schools to analyze achievement data as soon as it becomes available. RESA staff and outside consultants may be utilized to provide data analysis workshops in addition to the on-going data analysis conducted on-site by each school’s leadership team. Assessment data analysis begins as soon as test results are returned to the system. State assessment data, along with other data that includes attendance, discipline, parent involvement, and local assessments, are utilized as part of the needs assessment conducted by each school and guides the school improvement plans, federal programs, professional learning, and instructional purchases that comprise the CLIP. This is done through the Comprehensive Needs Assessment.

Clinch County School System uses the list of comprehensive support & improvement, promise, or targeted support improvement schools.

Schools provided by the GaDOE as the identification process for high risk schools.  We currently do not have any comprehensive support & improvement, promise, or targeted support improvement schools.

 schools in the district. If no schools are on the comprehensive support & improvement, promise, or targeted support improvement schools list, the district uses CCRPI scores that are used to determine the state’s Chronically Failing Schools list to identify schools that are high risk.

All program expenditures are monitored by the federal programs directors and coordinator to verify that all program expenditures comply with federal program requirements and that correct requisition procedures have been followed. Periodic requests are made for expenditure reports to monitor expenditures and verify that the appropriate personnel are coded and paid from federal program budgets. All documentation for auditing or monitoring purposes, according to specific program requirements, will be maintained by the federal program director and/or Director of Finance.

Budget Reports: Technical Assistance is provided to schools by the Federal Programs Coordinator Directors in various ways. Budgets are completed by the school principal, or designee, based on the comprehensive needs assessment and the schoolwide plan. Phone calls, emails, and on-site visits are provided as needed to complete the school budgets. At the end of each month, the Director of Finance verifies the expenditures against the budgets and investigates/corrects any discrepancies, in coordination with the program director.

When applicable, the Federal Programs Coordinator will work with the school administrators to develop and submit the appropriate budgets for the Title I Distinguished Schools program. In addition, the director will conduct on-site visits to ensure the purchases have been made and are being utilized in accordance with the budget submitted.

The Federal Programs Coordinator and Directors will monitor Schoolwide programs at all schools in the district. Monitoring will take place through the review of compliance documents andfederal program files*,* which includes completion of the periodic certifications, required schoolwide plans, parent plan annual revisions, and required notices to parents, including those related to flexible learning plans (FLP) and school choice, when applicable. Schoolwide plans may be placed on the school webpages. Technical assistance is provided with the principal and/or assistant principals about the results. Title I and other federal programs updates and technical assistance are provided to the school administrators at the monthly admin meetings with the superintendent. Technical assistance is also provided through emails and phone calls on a regular basis, as needed.

The Federal Programs Coordinator and Directors will maintain contact with the Technology Specialist and the school Media Specialist to ensure that all equipment and items purchased through federal funds with a useful life of one or more years are maintained on the school technology inventory and/or disposition list. An on-site property inventory by district and/or school personnel is conducted once per year by the end of December.

Methods of communications with principals, school improvement specialists, school personnel, and other program directors include large and small group meetings, formal and informal individual meetings, e-mail, memorandum, or by telephone. Communication is two-way, and it is not uncommon for the Federal Programs Coordinator or Directors to speak with one of the administrators on a weekly or daily basis to ask and answer questions or discuss concerns about funding, procedures, allowable expenses, or other federal program requirements and vice versa.

In the years when the system is not monitored on-site by the state Title I and other federal programs office, the Federal Programs Coordinator and Directors will complete the LEA Self-Monitoring Checklist and submit it to the Georgia Department of Education (GaDOE) by the specified deadline, if applicable. The Clinch County Title I Program and the other federal programs will follow the four-year monitoring schedule as published by GaDOE. The Federal Programs Coordinator and other program directors, as well as the Director of Finance and any other appropriate staff members, will participate in monitoring training and technical assistance sessions that are held face-to-face and online.

Corrective action, if any, from GaDOE monitoring will be discussed with administrators in order to assist them in understanding critical needs for compliance in Federal Programs. Professional learning will be provided based on needs and will be used as a preventative measure to ensure all staff have a clear understanding of all expectations of every facet in federal programs.

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 specific federal program. If a corrective action plan is required, the Federal Programs Coordinator and Directors will respond in a timely manner and submit the appropriate documentation to the state federal programs office. Implementation of the corrective action plan will be monitored by the appropriate federal program specialist.

In the instance where the LEA identifies any needed corrective actions, Federal Program Directors/Coordinators will meet with administrators in order to assist them with implementing and monitoring the corrective actions plan(s).

IDEA Flowthrough funds are monitored by the Special Education Director, in conjunction with the Clinch County School’s Director of Finance. Budgets are completed and submitted to the GaDOE for approval. The Special Education Director will undergo training from the GaDOE and other sources to maintain proficiency with compliance requirements. Additional training occurs through webinars and email notifications with the GaDOE Special Education Department. Approval for submission of requisitions is required from multiple sources at the school and district level.

**Timeline for Monitoring of Federal Programs**

**July**

* CNA/DIP (CLIP) due to GaDOE (July 30)
* School Improvement/Schoolwide Plan (SIP/SWP) Meetings
* Administrator Training to review Federal Program guidelines
* Title I system meeting with stakeholders
* Title IC Implementation plans due- July 30
* Intradistrict Transfer Policy Notification (multiple ways) by July 1
* Parent Notification that school is Title I (multiple ways) – July 29
* Direct Parent Notification that school is comprehensive support & improvement, promise, or targeted support improvement schools.
* (If Applicable) – July 29
* Update SSIP, components 1-6 and CEIS if applicable, Pre-school exit data submission, postsecondary outcomes, submission and child find and early childhood submission (July 29)
* Collect Monthly PARS (If applicable)

**August**

* Title I Section 1118 Professional Training to faculty and staff
* Title I Parent Feedback Meetings with Breakout sessions with individual schools
* School Improvement/Schoolwide Plan (SIP/SWP) revisions due to BOE
* Review School-Parent Compacts/Parent Involvement Plans
* Provide Technical Assistance to Principals, Media Specialist, Homeless Liaison, and Parent Involvement Coordinator, Title IC Support Specialist
* Solicit input from ALL parents on School-Parent Compacts, SWP/SIP and Parent Involvement Plan
* Notification of FY22 Allocations
* Post Parent’s Right to Know Letter and System Notification Letter on school website
* Principal Attestations and Assurances form signed
* Monthly Admin/Cabinet meetings- CNA and SIP/SWP monitoring
* Distribute SIP/SWP to teachers
* IDEA Continuation of services data deadline for submission- Aug. 31
* Title I personnel schedules due to Title I Director/Coordinator – August 31
* Collect Monthly PARS (If applicable)

 **September**

* Title I Annual Meeting
* Deadline for Title I meetings
* School Parent Involvement Plans due/finalized
* District Parent Involvement Plan due/finalized
* Monthly Admin/Cabinet meetings- CNA and SIP/SWP monitoring
* Provide Technical Assistance Meetings at schools
* Annual Homeless Education Survey due (Sept. 30)
* Title IC budget due
* Annual Re-sign Forms to migrant office – Sept. 15 deadline
* Distribute 20-Day Notification letter to parents to inform them if a teacher not meeting the LEA’s Professional Qualifications is in the classroom for 20 or more consecutive days.
* IDEA Timelines Data- Child Find and Early Childhood Transition data due Sept. 30
* Title IC PAC Meeting #1
* Collect Monthly PARS (If applicable)

**October**

* Send private school participation request letter in ES4PS(no later than Oct 31)
* Title IIA budget due - Oct. 1
* Title I budget due - Oct. 1
* Monthly Admin/Cabinet meetings- CNA and SIP/SWP monitoring
* School-Parent Compact revisions finalized and dated
* School & LEA Parental Involvement plans finalized and dated
* Share School and LEA Parental Involvement Plan with parents
* Send home School-Parent Compacts
* Signed and dated School-Parent Compacts due back to schools by Oct. 31
* Title V-B Annual Program Evaluation Report due- Oct. 31
* Title V-B Budget due – Oct 31
* Completion Reports due- Oct. 31
* IDEA budgets due – October 1
* Federal Pre-K (Special E) budget due – October 1
* Collect Monthly PARS (If applicable)

 **November**

* Monthly Admin/Cabinet meetings- CNA and SIP/SWP monitoring
* Annual Title I Informational Meeting (no later than November 1)
* Title I Comparability report deadline (November 15)
* Foster Care Transportation Plan due
* Title IC PAC Meeting #2
* Collect Monthly PARS (If applicable)

 **December**

* Inventory Reviews by Media Specialist & District designee
* Annual N & D survey due- Dec 1st
* IDEA-Transition planning collection 1 submission (Dec 9)
* Monthly Admin/Cabinet meetings- CNA and SIP/SWP monitoring
* Federal Programs Property Equipment updated inventories due to Directors/Coordinators with signatures and dates
* Collect Monthly PARS (If applicable)

 **January**

* 1st semester Periodic Certifications due
* Federal Programs reminders and updates to principal
* Title IIA Professional Learning Needs Assessment surveys sent to schools
* Monthly Admin/Cabinet meetings- CNA and SIP/SWP monitoring
* CLIP progress monitoring due in the SLDS
* IDEA Excess Cost Calculation due
* Collect Monthly PARS (If applicable)

   **February**

* Monthly Admin/Cabinet meetings- CNA and SIP/SWP monitoring
* Send Parent Engagement surveys home to parents
* Review and analyze Parent Engagement Surveys
* Distribute a 20-Day Notification letter to parents to inform them if a teacher not meeting the LEA’s Professional Qualifications is in the classroom for 20 or more consecutive days (if necessary).
* Collect Monthly PARS (If applicable)

   **March**

* Needs Assessment process begins for all federal programs
* Monthly Admin/Cabinet meetings- CNA and SIP/SWP monitoring
* Title IC-Region and State MEP-PAC Meetings
* MOE Reconciliation due
* Title IC PAC Meeting #3
* Collect Monthly PARS (If applicable)

**April**

* Begin annual evaluation of Title I school program
* Monthly Admin/Cabinet meetings- CNA and SIP/SWP monitoring
* Collect Monthly PARS (If applicable)

 **May**

* Monthly Admin/Cabinet meetings- CNA and SIP/SWP monitoring
* Conduct End-of-Year meeting with stakeholders to receive feedback and revise School-Parent Compacts, CLIP, SIP/SWP, and School Parent Involvement Plans
* Review Assessment Data along with other survey data to develop goals for next year
* Deadline for Title IA, IC, and VB amendments- May 15th
* Title IC Implementation Plan Evaluations due
* School Improvement/Schoolwide Plan (SIP/SWP) Meetings
* Collect Monthly PARS (If applicable)

 **June**

* Review Assessment data along with other survey data to develop goals for next year
* School Improvement/Schoolwide Plan (SIP/SWP) Meetings to finalize CLIP
* 2nd semester Periodic Certifications due
* Title IC Summer Implementation Plan Evaluations due, if applicable
* Submit DIP/SIPs (CLIP) to GaDOE-June 30th
* Collect Monthly PARS (If applicable)

**June-July**

* Summer administrative workshop with Federal Programs directors/coordinator, building level administrator(s), superintendent, and assistant superintendent to review data and report progress toward improving CCRPI indicators.
* IDEA Amendments due
* IDEA Preschool Exit data
* IDEA Post-School Outcomes data

**TITLE I SCHOOLWIDE PROGRAMS (SWP)**

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

Principal involvement is critical to the success of Title I Schools. They are invited to all meetings, provided guidelines and expectations, and are encouraged to provide feedback and offer suggestions to improve processes and procedures. The principal is directly responsible for the presentation, review and revision of his/her school’s policies and procedures as related to the school improvement plan, parent involvement plan and activities, Annual Title I Parent Meetings, and the teacher-parent compacts. Samples of required information are given to the principal at Technical Assistance meetings throughout the year. The principal also has a copy of the GADOE Title I Handbook which outlines requirements and provides specific due dates. The principal may choose the meeting format and delivery of required Title I components if the integrity of the requirements is maintained.

Schoolwide Title I schools must use funds available under Title I, Part A for programs, activities, and strategies that are scientifically-based on research and meet needs identified through the comprehensive needs assessment process. The expenditures must also be tied to the district or schoolwide/school improvement plan. The comprehensive needs assessment process must include the needs of migrant students, based on information that includes how students are meeting the state's challenging academic standards.

In schoolwide schools, Title I, Part A funds may be used for activities that are part of the school’s schoolwide/school improvement plan to improve student performance and upgrade the entire educational program.

**Use of School Improvement/Schoolwide Plans (SIP/SWP)**

Each Title I school is required to have a school improvement plan that includes all mandatory components in the Schoolwide program checklist. As part of the schoolwide reform program, the principal ensures that his/her school:

* Conducts a comprehensive needs assessment
* Identifies and commits to specific goals and strategies that address those needs
* Creates a comprehensive plan (SIP/SWP)
* Conducts an annual evaluation of the effectiveness of the schoolwide program and revises the plan at least annually

The School Improvement Team includes the school leadership team, school staff (departments or grade levels), central office staff, parents, and students, where applicable. Each group is given the opportunity to provide input for the plan. During the schoolwide plan evaluation, the team reviews progress towards performance targets set in the current SIP/SWP and revises goals, targets, strategies based on the most current needs assessment. The elimination, revision, and addition of initiatives or action steps are a natural part of the continuous improvement process. This allows for the direction of resources towards the initiatives with the highest priority.

While the School Improvement Plan defines and addresses school-wide initiatives and performance targets, content specific outcomes are defined for each grade level or content area after a review of student data at the beginning of each school year. This process is cascadeddown to individual teachers to set expected classroom and individual student outcomes.

Schoolwide Plans that are unapproved at the district level are sent back to the school team and Technical Assistance from the district is provided to resolve the unapproved SWPs.

**Use of EOC, EOG, and ACCESS tests to make instructional decisions**

The analysis from ACCESS, EOC, and EOG administrations begins as soon as the data is received from the GADOE. This data is utilized as part of the needs assessments conducted by each school and helps guide the programs (academic and parental involvement), professional learning, and instructional purchases that comprise the CLIP and the revision of Schoolwide/ School Improvement Plans.

**Use of the S.M.A.R.T Method to Set Goals, Objectives or Targets**

We believe in the use of SMART goals, objectives, and targets as a part of our performance culture. This is a part of the SIP review process:

Specific – a specific performance within the area of performance focus

Measurable – data is collected to determine progress and results

Attainable – it can be reached by average performers in the school or system Relevant – it is important to the improvement of student achievement

Time Oriented – deadlines are set and adhered to

**Use of Lagging vs. Leading Indicators**

Lagging Indicatorsare typically the measures of performance for which the school or school system is publicly accountable. The most widely used lagging educational indicators are state and national test scores. Test scores in education are the equivalent to financial measures (e.g. profit) in business. Although both profit and test scores reflect the overall success of their respective organizations, these indicators alone do not tell those inside the organization enough about all the drivers of performance that are impacting results. The use of lagging indicators does not allow the organization to make decisions in time to make a change or use interventions that can improve results.

Leading Indicatorsare performance drivers used to monitor the results of processes and systems that impact lagging indicators. For example, comparing leading indicators such as student performance on classroom assessments against specific standards can give students, teachers, other school leaders and external stakeholders an indication of students’ achievement progress before state tests are administered in time to provide additional support to students. Some of the leading indicator drivers used are IXL Math software, USA Testprep software, Study Island software, Measures of Academic Progress (MAP) software, Reading Inventory, Acadience, PPVT, PALS, Write Score, etc.

It is the responsibility of the principal, or designee to make sure that everyone in the school/department has access to the SWP/SIP/CCRPI. This accessibility ensures that everyone involved fully understands the district’s/school’s strategic directions and measures of success before initiatives and projects are selected.

Clinch County’s SWP/SIP and CCRPI results are available on the school website and in administrator offices. These documents are the basis of discussions with school leadership teams, departments, grade levels, school councils and parent groups. CCRPI results and goals from SIP/SWP are shared publicly at Board of Education meetings. Parents are also given a flyer stating that the plans can be accessed online, at the school, or mailed to them upon request.

**Comprehensive LEA Improvement Plan (CLIP)**

Clinch County’s CLIP revisions take place annually using prior year’s data and needs assessment information. The CLIP serves as the plan detailing coordination of various federal programs and identification of county needs and in turn budgeting for such needs with federal funds. The district will ensure that all Title I parents have an opportunity to be involved in the development and review of the CLIP. The Federal Programs Coordinator schedules and conducts a Title I Plans Revision meeting in the spring of each year. Parents are invited by publishing an invitation on the system website, social media websites, automated phone calls, and in the local newspaper. Another stakeholder meeting is held to present the CLIP. A meeting agenda and sign-in sheet is maintained during meetings related to CLIP revisions and presentations. Once all revisions to the CLIP are made, the information is entered into the Consolidated Application for approval by DOE Title Program Specialists.

**Fraud, Waste, Abuse, and Corruption**

In compliance with White House Executive Order 12731, the Clinch County School System provides all employees, clients, vendors, and individuals with confidential channels to report suspicious activities. The Clinch County School System shall not tolerate fraud, waste, abuse or corruption of any kind and has an established system for the reporting and investigating of suspicious activities for Title I, Part A; Title I, Part C: Title I, Part D, Title II, Part A; Title III, Title IV, Title VB, Title IX: McKinney Vento Act, IDEA, and ESSER.

**Definitions**

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

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

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

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

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

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

**Statement of Administrative Regulations:**

Any and all reports of suspicious activity and/or suspected fraud, waste, abuse, or corruption, shall be investigated. The Clinch County School System shall not tolerate fraud, waste, abuse, or corruption of any kind, and any reported cases of suspected fraud, waste, abuse, and corruption will be thoroughly investigated to determine if disciplinary, financial recovery, and or criminal action should be taken.

**Confidentiality**

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

**Procedures and Responsibilities**

1. Anyone suspecting fraud, waste, abuse, or corruption whether it pertains to local, state, or federal programs, shall report his or her concerns to the Superintendent or the Superintendent’s designee of the Clinch County Board of Education at 46 South College St. Homerville, GA 31634.

2. Any employee with the Clinch County Board of Education (part-time staff, full-time staff and contractors) who receives a report of suspected fraudulent activity MUST report this information within the next business day. The employee should contact the Superintendent or Superintendent’s designee at (912) 487-5321. Employees have the responsibility to report suspected fraud, waste, abuse, or corruption. All reports can be made in confidence.

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

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

5*.* Periodic communication through meetings should emphasize the responsibilities and channels for reporting suspected fraud, waste, abuse, or corruption.

6. A hard copy of these Fraud, Waste, Abuse and Corruption Administrative Regulations shall be posted in a visible location at all schools and facilities and on the Clinch County Schools website (www.clinchcounty.com)

7. A report shall be made to the Chairman of the Clinch County Board of Education if fraud, waste, abuse, or corruption is suspected of or by the Superintendent.

8. Each employee shall review the document and sign-off in Compliance Director attesting that he or she has indeed received this information and understands its contents.

Technical Assistance concerning fraud, waste, abuse and corruption, and complaint procedures is provided to schools in August of each year. The Title I coordinator guides school administrators in distributing information to faculty and staff. Administrators and Title I Coordinator require staff to sign-off upon receiving this information. Administrators make sure that all staff are involved.

**Conflict of Interest**

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

The officers, employees, and agents of the LEA may not solicit gratuities, favors, or anything of monetary value from contractors or parties to subcontractors. All employees of the Clinch County Board of Education shall maintain integrity with students, parents, colleagues, patrons, school related organizations, or businesses when accepting gifts, gratuities, and/or favors. The financial interest of such gifts shall not be substantial and the gift must be unsolicited and of nominal value. Employees must engage in ethical conduct which includes, but is not limited to, activities as specified in the Code of Ethics for Educators adopted by the Professional Standards Commission. Violations of the Conflict of Interest policy will be investigated and may result in termination of employment and/or referral to the Professional Standards Commission.

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.

**3.1.b 505-6-.01 Code of Ethics for Educators**

All employees of the Clinch County School System are required to complete the Georgia Code of Ethics for Educators, Sexual Misconduct Reporting, Mandated Reporting, Suicide Prevention, Social Media, and FERPA Modules on the Compliance Director Website. A report is printed from the Compliance Director showing who completed which modules and each module is time stamped upon completion. The Federal Programs Coordinator checks off that each employee has completed all mandatory modules. If an employee has not completed a module then the Coordinator makes email or phone contact with the employee. Principals are required to discuss policies at a faculty meeting at the beginning of the year. This year, the TI director spoke specifically to principals regarding ethics and fraud during an administrative meeting.  Principals were to discuss the same information with their personnel.  Bus drivers and maintenance personnel may complete the modules in small groups with the transportation administrative assistant due to limited accessibility of computers and other factors. If completed in this manner, employees will sign that they received the compliance director training information. The Clinch County fraud regulation describes the definition, staff responsibilities, and internal controls/investigations. *See Appendix A for Code of Ethics.*

**Complaint Procedures:**

**Title I, Part A; Title I, Part C: Title I, Part D, Title II, Part A; Title III, Title IV, Title VB, Title IX: McKinney Vento Act, IDEA, and ESSER.**

Board Policy GAE describes the complaint and grievances procedures for certified personnel. Parents/school communication is described in student handbooks and on the website.  Parents are expected to address complaints or grievances beginning at the school level with the teacher first and then the administration.  Central office personnel should be contacted next should parents feel the issues have not been resolved.  If still unsatisfied, the superintendent should be contacted.  Parents have the right to speak to the Board of Education through public participation at a Board of Education meeting.  Conference forms/notes/minutes are kept on file as documentation of the issues.  Complaint procedures are described and a form for documenting complaints is located in the administrative handbook.  The complaint procedures describe grounds for complaints, federal programs for which complaints can be filed, filing and investigation of a complaint, as well as rights to appeal.  The GADOE address to which complaints should be filed is included in the procedure. *See Appendix A for Complaint Form.*

**Grounds for a Complaint**

Any individual, organization, or agency (complainant) may file a complaint with the Local Educational Agency (LEA) if that individual, organization, or agency believes and alleges that the LEA is violating 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 year prior to the date that the complaint is received, unless a longer period is reasonable because the violation is considered systemic or ongoing.

**Federal Programs for Which Complaints Can Be Filed**

1. **Title I, Part A: Improving the Academic Achievement of the Disadvantaged**
2. **Title I, Part A: Academic Achievement Awards**
3. **Title I, Part A: Foster Care Program**
4. **Title I, Part A: Family-School Partnership Program**
5. **Title I, Part C: Education of Migratory Children**
6. **Title I, Part D: Programs for Neglected or Delinquent Children**
7. **Title II, Part A: Supporting Effective Instruction**
8. **Title III, Part A: Language Instruction for English Learners and Immigrant Students**
9. **Title IV, Part A: Student Support and Academic Enrichment**
10. **Title IV, Part B: 21st Century Community Learning Centers**
11. **Title V, Part B: Rural Education Initiative**
12. **Title IX, Part A: McKinney-Vento Homeless Assistance Act**
13. **Emergency Relief Funds: CARES Act, CRRSA Act, ARP Act**

**Complaints at the Local Level**

By accepting federal funds, the LEA agrees to accept and resolve complaints alleging violations of the law in the administration of covered programs. A complaint should not be filed with the GaDOE until every effort has been made to resolve the issue locally. If the complainant has tried to file a complaint with the LEA to no avail, the complainant must provide the GaDOE with written proof of their attempt to resolve the issue at the local level.

**Filing a Complaint**

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

1. A statement that the LEA has violated a requirement of a federal statute or

     regulation that applies to an applicable program.

2. The date on which the violation occurred.

3. The facts on which the statement is based and the specific requirement

   Allegedly violated (include citation of the federal statute or regulation).

4. A list of the names and telephone numbers of individuals who can provide

 additional information.

5. Whether a complaint has been filed with a school, and if so, which school.

6. Copies of all applicable documents supporting the complainant’s position.

7. The address of the complainant.

The complaint must be addressed to:

Clinch County Schools

Attention: Superintendent

46 South College Street

Homerville, GA 31634

Once the complaint is received by the Office of the Superintendent, it will be copied and forwarded to the appropriate Federal Program Director.

 **Investigation of Complaint**

Within ten (10) days of receipt of the complaint, the Federal Program Director will issue a Letter of Acknowledgement to the complainant that contains the following information:

1. The date of the LEA received the complaint.

2. How the complainant may provide additional information.

3. A statement of the ways in which the LEA may investigate or address the

    complaint.

4. Any other pertinent information.

5. If the complaint involves a school, the Federal Program Director will also send a

   copy of the Letter of Acknowledgement to the Principal, along with a copy of the

   complaint. The Federal Program Director will contact the Principal to clarify the

   issues and review the complaint process. If the complaint cannot be resolved

   through this contact, the Federal Program Director will invite the Principal to

   submit a written response to the complainant. The Federal Program director will

   review the information and determine whether:

1. Additional information is needed.

2. An on-site investigation must be conducted

3. Other measures must be taken to resolve the issues raised in the complaint

4. A Letter of Findings can be issued.

If additional information or an investigation is necessary, the Federal Program Director will have 60 days from receipt of the information or completion of the Investigation to issue a Letter of Findings. If the Letter of Findings indicates that a violation has been found, corrective action will be required and timelines for completion will be included. Either the 30 day or the 60 day timelines outlined above may be extended, if exceptional circumstances exist.

The Letter of Findings will be sent directly to the complainant, as well as other parties involved.

**Right of Appeal**

If the complaint cannot be resolved at the local level, the complainant has the right to request review of the decision by the Georgia Department of Education.  The appeal must be accompanied by a copy of the Superintendent’s decision and include a complete statement of the reasons supporting the appeal.

The complaint must be addressed to:

Georgia Department of Education

Office of Legal Services

205 Jesse Hill Jr. Drive SE

2052 Twin Tower East

Atlanta, GA 30334

**Services to Eligible Private Schools**

Private schools within the county as well as those outside the county who serve Clinch County Students are invited annually, through the Equitable Services 4 Private Schools (ES4PS) in the SLDS platform, to consult regarding participating in Title/IDEA programs and services. To date, no private school has chosen to receive any Federal Program monies from: **Title I, Part A; Title I, Part C: Title I, Part D, Title II, Part A; Title III, Title IV, Title VB, Title IX: McKinney Vento Act, and IDEA. (Only ESSER was sent via email.)**

**IDEA Affirmation of Representatives of Private Schools**

IDEA 2004 requires Local Educational Agencies providing special education programs to engage in timely and meaningful consultation with representatives of private schools and with parents about the provision of special education and related services for parentally placed private preschool students attending private school officials to provide written affirmation of a satisfactory consultation process.

Parentally placed private or home school students may access Special Education (IDEA) support services and may find additional information (Child Find) on the District’s website: under the department of Student Services: Child Find.

**Note: There are no k-12 private schools within Clinch County’s boundaries. Students identified as having disabilities are 1). Sent a letter directly regarding services. 2) Sent parental rights. 3) Invited to consult regarding available services.**

**Maintenance of Effort and Comparability**

Clinch County School System meets Maintenance of Effort requirements. Clinch County School System has one elementary school, one middle school, and one high school. The elementary and middle schools are Title I schools. The high school is not a Title I school. Comparability checks are not applicable since we only have one school at each level.

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. Special Education Programs in the Clinch County Schools follow all guidelines associated with the use of Federal Funds and MOE Requirements. If any questions arise regarding MOE, the Special Education Director and/or Director of Finance contact the GaDOE for guidance. If the system does not meet MOE requirements, the system must lower their MOE through the exceptions listed. Documentation must be submitted to verify the exceptions to meet the MOE requirement before the system's budget can be processed for approval. The special education director follows the guidance set forth in 34 CFR 300.184 governing the expenditure of IDEA funds that states only approved special education and related services may be charged to the Flow Through and preschool grant.

**Assessment Security**

Clinch County has a system Assessment Plan in place that is reviewed and/or revised each year. System/School leaders work with school staff to annually review the assessment plan and calendar and recommend changes. This plan is shared with all system employees. The superintendent ensures that the appropriate link for the School Report Card has been posted on the district website and on each school’s page.

**Supplement not Supplant**

Federally supported educational programs are designed to supplement rather than supplant regular educational programs. All Clinch County BOE federal programs except for ESSER have been planned and budgeted to assure that federal funds will supplement and not supplant state and local funds.

Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards (2 C.F.R. Part 200) 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.

**Schoolwide Title I Schools**

A schoolwide school shall use Title I funds only to supplement the amount of funds that would, in the absence of Title I funds, be available from non-Federal sources for the school, including funds needed to provide services that are required by law for children with disabilities and English Learners.

The presumptions used to determine if supplanting has occurred (in bullet form above) do not apply to the use of Title I funds in a schoolwide program school. The supplement not supplant requirement for a schoolwide program is simply that the school receive all non-Federal funds it would receive if it did not receive Title I funds (with the two caveats noted below).

* An LEA does not have sufficient non-Federal funds to provide even the most basic education program in all its schools. In this situation, if Title I funds are used to provide part of the basic level of education funding, they would not be supplemental because an LEA is charged with providing a basic level of funding for all its students.
* An LEA is required by State or local law to provide funding for a specific purpose for all students. *(An LEA may exclude from supplanting determinations supplemental non-Federal funds expended in any school for programs that meet the intent and purposes of Title I.)*

In addition to the supplemental funds test for school wide programs, the LEA also complies with Title I’s maintenance of effort and comparability requirements as well as resource comparability requirements under Title VI of the Civil Rights Act of 1964.

  **Internal Controls**

* Clinch County School System uses PC Genesis as the accounting software program which has the ability to maintain separate funds for Federal and Non-Federal activities.
* Our software systems segregate the duties of receiving funds, depositing funds, and receipting funds into the software. Bank reconciliations are completed by a third party.
* The Clinch County Board of Education reviews fund financial reports, for approval, each month.
* Budgets of all grants are reviewed by the Federal Programs’ Director(s) on a monthly basis to ensure that the uses of those funds are aligned with the proper guidelines and approved budget allocations.
* Purchase order approval:
	+ Approval by building level administrator, and/or the Federal Programs’ Director (or coordinator) responsible for the particular fund from which the P.O. will be paid.
	+ Final approval, authorizing the purchase, is by the system Superintendent.
* All credit cards are recorded. The date and employee signature are required when an employee is requesting a card for use. After use, the card must be logged back in. Date and signature are required. At the time of logging the card back in, the employee must give the card and any purchase related receipts to the accounts payable department, or school bookkeeper if it is a school level purchase card.
* Request for Travel Reimbursement Approval:
	+ Approval by principal
	+ Approval by Federal Programs’ Director(s) (or coordinator) responsible for the particular fund from which the travel reimbursement will be paid.
	+ Final approval, authorizing the reimbursement, is by the system Superintendent.
* All expenses are kept in the functions as advertised when the budget was approved
* All documents containing sensitive information, such as social security numbers, are kept under limited access.
* All checks and negotiable instruments are kept in a secure and limited access area.
* Individual passwords for the computer network, accounting software, and internet accessible sites such as the portal for the Georgia Department of Education are all changed on a periodic basis or as needed.
* Monthly leave reports are signed by supervisors/principals and submitted to the payroll department. Excess leave is deducted, if applicable.
* The school activity accounts are reviewed on a periodic basis by the Clinch County Board of Education Director of Finance to ensure compliance with accounting practices.
* The Georgia Department of Audits and Accounts performs single audits on the school system and also audits the financial statement prepared by the Director of Finance.
* A contracted third party accountant reconciles monthly bank statements of the Clinch County Board of Education, reconciles fund 199 (payroll), processes W2s and 1099s at the end of the calendar year, prepares quarterly tax and employment reports, processes the CS-1 report, and closes our monthly/yearly financials in our accounting software.
* A risk assessment is completed each year as a part of the audit paperwork thereby recognizing possible risks and how these risks or exposures are limited or eliminated.
* Any audit findings from the prior year are noted in the financial statement report along with how and when these findings are to be completely addressed.
* All financial department employees of the Clinch County Board of Education are fingerprinted, have a criminal background check completed, and their application is thoroughly reviewed for familiarity of the job description, their integrity, and their honesty before being recommended for a position in the financial department.

**Procedures for Budget Approval and Monitoring Expenditures**

The Federal Program Directors prepare the overall system budgets, after reviewing input received from schools, parents, and stakeholders.

* The Federal Programs Directors enter and submit the budgets into the GaDOE portal.
* The Superintendent signs assurances and approval of the budgets in the GaDOE portal.
* GaDOE area program consultant approves budget.
* GaDOE state specialist approves budget.
* The Program Director provides a copy of the GADOE approved budget to the Director of Finance. The Program Director provides guidance on setting up the LEA budget.
* Clinch County Director of Finance enters the budget into the software program.
* The Director of Finance gives PC Genesis reports of federal program budgets to appropriate Federal Program Directors, to verify that the budget is set-up exactly as approved by the GADOE.
* The Director of Finance and Federal Program Directors meet periodically to review federal program financial data.

As the budget moves through the approval process, any revisions are directed back to the Federal Program Directors who make necessary revisions and resubmit as needed.

When the budget needs amending or carry-over money is received, the Federal Program Directors meet with school administrators to review needs assessment data, SIP/SWP, and CLIP to support the budget amendments. Then, the process above is repeated.

**Segregation of Duties for Expenditures**

The LEA requires segregation of duties for all expenditures as listed below:

**Expenditure Approval**

All expenditures must have prior approval for allowability by the program director and must follow system purchasing guidelines used by all system bookkeepers.

1. Designee initiates the Purchase Order (P.O.) complete with:

* Complete vendor information including phone number, fax number, and web address, if applicable
* Ship to information including address for school
* Name of person requesting the purchase

2. Schools send the P.O. to the appropriate Federal Programs Director/Coordinator who reviews and verifies the information is included in the ConAPP budget page for the school. The program director/coordinator will then check the funding source and approve the requisition by signing the form.

3. Information is then given to the Superintendent for review, approval, and signature and sent to the accounts payable (A/P) department.

**Expenditure Receipt**

1. A/P personnel enters the P.O. into our accounting software. He/she then returns a copy of the P.O. to the federal programs directors/coordinator and to the school bookkeeper.

2. The approved P.O. is then sent to the vendor by the person who initiated the P.O..

3. When invoices are received at the central office, the A/P personnel matches the invoice to the P.O.

**Expenditure Payment**

1. Once the A/P personnel receives notice that items have been received, he/she moves the PO to a claim to be selected for payment.

2. A/P personnel processes payments once per week, generally on Thursdays.

3. Checks are run on blank stock and signed by the BOE Chairperson and Superintendent.

Clinch County 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).

Federal Program Directors/Coordinator(s) also attend conferences, trainings, professional development etc. Adherence to state and local travel guidelines is required. Upon return from the conference, training, professional development, etc., the individual submits the completed expense form for superintendent approval of expenditures.

**Budget Monitoring**

The budget for each federal program is recorded in the financial management system using the designated 3-digit fund code. Encumbrances and expenditures are also recorded in the financial system. The district’s program directors approve all federal expenditures through the purchase order process. On a regular basis, the program directors and financial director compares the actual expenditures with the budgeted amounts of the federal award. Any questions on the budget are addressed and resolved during the regular review process.

**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.

**Conflict of Interest**

Substantial state and federal requirements exist pertaining to standards of conduct and conflict of interest. In accordance with 2 CFR 200.318(c)(1), 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. Conflict of Interest policy is disseminated during pre-planning faculty/staff meetings at all schools.

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 CFR 200.13(c), Clinch County School System adheres to the federal standards with regard to selection, award, and administration of federal contracts.

The LEA will disclose in writing a 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.

**Full and Open Competition**

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

\* placing unreasonable requirements on business in order for them to qualify to do business;

\* requiring unnecessary experience and excessive bonding;

\* noncompetitive pricing practices between business or between affiliated companies;

\* noncompetitive contracts to consultants that are on retainer contracts;

\* organizational conflicts of interest;

\* specifying a brand name product instead of allowing an equal product to be offered and describing the performance or other relevant requirements of the procurement; and

\* any arbitrary action in the procurement process.

The district 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, after consultation with school level personnel, is prepared and submitted by the appropriate Federal Program Director/Coordinator. Once the budget is submitted and approved by the state, designees submit requisitions via purchase orders.

 All federal programs purchase orders (PO) are routed to the appropriate director/coordinator, who either approves or denies the request.  If denied it is routed back to the principal with recommendations. If approved, the requisition is reviewed for account number logic by the Federal Program Director/Coordinator.  If approved, the PO is signed by the superintendent and sent to the accounts payable (A/P) department.  A/P personnel then return a copy of the PO to the appropriate Federal Program director/Coordinator and the school bookkeeper. The approved PO is then sent to the vendor.

 When the invoice is received in the central office from the vendor, it is sent to A/P personnel that matches the invoice to the PO. Upon notification of goods received, A/P personnel moves the PO to a claim and prepares vendor checks.  A/P personnel processes checks once per week, typically on Thursday.  The checks are run on blank stock and signed by the Board of Education Chairperson and superintendent. The checks are then processed for mailing.  Clinch County uses the indirect cost calculation, chart of accounts, and Grants Accounting Online Reporting System (GAORS) provided by GADOE to plan, budget, expend, and draw down 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**

The LEA must use one of the following methods of procurement:

1. Procurement by micro-purchases. Procurement by micro-purchase is the acquisition of

supplies or services, the aggregate dollar amount of which does not exceed the micro purchase threshold (§200.67 Micro-purchase) of $10,000.00, but this threshold is

periodically adjusted for inflation. LEAs should calculate the aggregate dollar amount for

each purchase order of supplies or services. To the extent practicable, the non-Federal

entity should distribute micro-purchases equitably among qualified suppliers. Micro purchases may be awarded without soliciting competitive quotations if the non-Federal

entity considers the price to be reasonable.

I. As the LEA monitors purchases by program, there are times when multiple program

funds could be combined for a single purchase, professional learning for example.

The LEA should remember that the total amount of the purchase, not each

program’s contribution, dictates the procurement procedures to follow.

2. Procurement by small purchase procedures. Small purchase procedures (§200.320) are

those relatively simple and informal procurement methods for securing services, supplies,

or other property that do not cost more than the simplified acquisition threshold (§200.88)

of $250,000.00. If small purchase procedures are used, price or rate quotations must be

obtained from an adequate number (at least 2) of qualified sources.

3. Procurement by sealed bids (formal advertising) for purchases greater than $250,000.00.

Bids are publicly solicited, and a firm fixed price contract (lump sum or unit price) is

awarded to the responsible bidder whose bid, conforming to all the material terms and

conditions of the invitation for bids, is the lowest in price (§200.319).

a. In order for sealed bidding to be feasible, the following conditions should be

present:

i. A complete, adequate, and realistic specification or purchase description is

available;

ii. Two or more responsible bidders are willing and able to compete effectively

for the business; and

iii. 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.

b. If sealed bids are used, the following requirements apply:

i. Bids must be solicited from an adequate number of known suppliers,

providing them sufficient response time prior to the date set for opening the

bids, for local, and tribal governments, the invitation for bids must be publicly

advertised;

ii. The invitation for bids, which will include any specifications and pertinent

attachments, must define the items or services in order for the bidder to

properly respond;

iii. All bids will be opened at the time and place prescribed in the invitation for

bids, and for local and tribal governments, the bids must be opened publicly;

iv. A firm fixed price contract award will be made in writing to the lowest

responsive and responsible bidder. Where specified in bidding documents,

factors such as discounts, transportation cost, and life cycle costs must be

considered in determining which bid is lowest. Payment discounts will only

be used to determine the low bid when prior experience indicates that such

discounts are usually taken advantage of; and

v. Any or all bids may be rejected if there is a sound documented reason.

4. Procurement by competitive proposals (§200.319). The technique of competitive

proposals are normally conducted with more than one source submitting an offer, and either

a fixed price or cost-reimbursement type contract is awarded. It is generally used when

conditions are not appropriate for the use of sealed bids. If this method is used, the

following requirements apply:

c. Requests for proposals must be publicized and identify all evaluation factors and

their relative importance. Any response to publicized requests for proposals must

be considered to the maximum extent practical;

d. Proposals must be solicited from an adequate number of qualified sources;

e. The non-Federal entity must have a written method for conducting technical

evaluations of the proposals received and for selecting recipients;

f. Contracts must be awarded to the responsible firm whose proposal is most

advantageous to the program, with price and other factors considered; and

g. The non-Federal entity may use competitive proposal procedures for qualifications based procurement of architectural/engineering (A/E) professional services

whereby competitors' qualifications are evaluated, and the most qualified

competitor is selected, subject to negotiation of fair and reasonable compensation.

The method, where price is not used as a selection factor, can only be used in

procurement of A/E professional services. It cannot be used to purchase other types

of services though A/E firms are a potential source to perform the proposed effort.

5. Procurement by noncompetitive proposals. Procurement by noncompetitive proposals

is procurement through solicitation of a proposal from only one source and may be used

only when one or more of the following circumstances apply:

h. The item is available only from a single source;

i. The public exigency or emergency for the requirement will not permit a delay

resulting from competitive solicitation;

j. The Federal awarding agency or pass-through entity expressly authorizes

noncompetitive proposals in response to a written request from the non-Federal

entity; or

k. After solicitation of a number of sources, competition is determined inadequate.

**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 are not appropriate. Requests 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.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.

**Contract Administration**

The district awards contracts only to responsible contractors possessing the ability to perform successfully under the terms and conditions of a proposed procurement. The district considers such matters as contractor integrity and business ethics, compliance with public policy, ability to complete the project on time in accordance with specifications, record of past performance, and the contractor’s financial and technical resources.

The district will check references where possible and engage in practical activities such as checking with the local Better Business Bureau and the Secretary of State’s office to ensure there are no outstanding complaints against the contractor if applicable.

The district will award a contract to a contractor who has the appropriate experience, expertise, qualifications, and any required certifications, necessary to perform the work. Contractors should also have financial resources to sustain the project while the initial work is being completed and during each service period until he or she submits invoices for payment to the district as work is completed. Contractors should have the proper equipment necessary to complete the contracted work.

Debarment and Suspension: The district will not contract/subcontract with or award sub-grants to any person or company who is debarred or suspended from receiving federal funds. The federal program manager will verify the status at the System for Award Management (<https://sam.gov/>) website before any procurement transaction is paid with federal funds.

The district maintains the following oversights to ensure that contractors perform in accordance with the terms, conditions, and specifications of their contracts. The schools are responsible to ensure that the terms, specifications, and conditions of the contract are being met. If there is a problem noted, it is the responsibility of the school to notify the program director regarding the situation.

The contract should include clearly defined deliverables and terms that include:

* Description of services to be performed or goods to be delivered
* Description of dates when services will be performed or goods delivered
* Description of locations where services will be performed or goods delivered
* Description of number of students/teachers/etc. to be served if applicable
* Remedies for breach of contract – sanctions and penalties
* Termination procedures
* Compliance with federal statutes – 2 C.F.R. Part 200 Reporting procedures (if applicable)
* Requirements pertaining to copyrights (if applicable)

The district maintains:

* A copy of the written, signed contract for services to be performed.
* Records on the services performs- date of service, purpose of service- ensuring that services are consistent and satisfactorily performed as described by the contract.
* Documentation that the contractor was not paid before services were performed.
* Records of all payments made to the contractor.

**Vendor Selection**

Vendor will be selected on the following criteria:

* the purchase price
* the reputation of the vendor and the vendor’s goods or services
* the quality of the vendor’s goods or services
* the extent to which the goods or services meet the district’s needs
* the vendor’s past relationship with the district
* the impact on the ability of the districts to comply with laws and rules relating to historically underutilized businesses
* the total long-term cost to the district to acquire the vendor’s good and services
* the vendor’s response time and compatibility of goods/products purchased already in the district.

**Settlement of Issues Arising Out of Procurement**

The district is responsible for the settlement of all contractual and administrative issues arising out of procurements made with federal funds. These issues include, but are not limited to, source evaluation (analyzing information in order to assess their credibility), protests, disputes, and claims. Violations of law will be referred to the local, state, or federal authority having proper jurisdiction. The Director of Finance, Assistant Superintendent, and the Superintendent are responsible for handling and coordinating the settlement of any contractual and administrative issues arising out of procurements.

**Protest Procedures to Resolve Disputes**

The district will exhaust all efforts to resolve disputes relating to procurements made with federal funds. The protestor must exhaust all administrative remedies with the district before pursuing a protest with a federal agency. The Director of Finance, Assistant Superintendent, and the Superintendent are responsible for handling and coordinating any disputes relating to procurement.

**Allowability of Costs**

When using federal funds for purchasing, the Clinch County School System will follow guidelines detailed in the most current EDGAR handbook. All costs must be allowable under the federal cost principles and under the terms and conditions of the specific federal award. Expenditures must be aligned with budgeted items in the approved grant application. When determining how the district will spend grant funds, the program directors review the proposed cost to determine whether it is an allowable use of federal funds before obligating and spending those funds on the proposed goods and services. The LEA uses the System Improvement Plan/CLIP, Equity Action Plan, SSIP, and Schoolwide Plans to determine prioritized needs. A cost is allowable if it is an identified need in the CLIP and addressed in the district improvement plan or schoolwide plan. Source documentation is kept on file to determine allowability. Any questionable expense will be directed to the Area Program Specialist for further clarification.

**Factors Affecting Allowability of Costs**

The district staff must consider the following elements when determining the allowability of a cost. In accordance with the federal cost principles, all costs budgeted and charged to a federal grant must be:

* Necessary, Reasonable, and Allocable for the performance of the federal award
	+ A cost is reasonable if it does not exceed that which would be incurred by a prudent person under the circumstances prevailing at the time the decision to incurred the cost was made. Reasonable means that sound business practices were followed and purchases were comparable to current market prices.
	+ A cost can be reasonable if it meets all the following conditions:
		- Prudence was used in making the decision to incur the cost, considering the person’s responsibilities to the district, its employees, the public, and the federal government.
		- It is necessary to carry out the objectives of the grant program or is recognized as an ordinary cost to operate the organization.
		- The district applied sound business practices; federal, state, and local law and regulations; terms and conditions of the award in making the decision.
		- The price is comparable to that of the current fair market value for equivalent goods and services.
		- There were no significant deviations from the established practices of the organization which may unjustifiably increase the cost.
		- The district has the capacity to use what is being purchased.
	+ Necessary Costs: Necessary is determined by the needs of the program. The expenditure must be necessary to achieve an important objective of the program. It means it is vital or required in order to meet the objectives of the grant or for the grant to be successful. The LEA uses the System Improvement Plan/CLIP, Equity Plan, SSIP, and Schoolwide Plans to determine prioritized needs. Source documentation is kept on file to determine allowability.

 When determining whether a cost is necessary, the district considers:

* Whether the cost is needed for the proper and efficient performance of the grant program;
* Whether the cost is identified in the approved budget or application;
* Whether there is an educational benefit associated with the cost;
* Whether the cost aligns with identified needs based on results and findings from a needs assessment; and
* Whether the cost addressed program goals and objectives and is based on program data.
* Allocable to the federal award. A cost is allocable to the federal award if the goods or services involved are chargeable or assignable to the federal award in accordance with the relative benefits received. This means that the federal grant program derived a benefit in proportion to the funds charged to the program.
* Consistent with policies and procedures that apply uniformly to both federally financed and other activities of the district.
* Conform to any limitations or exclusions set forth as cost principles.
* Consistent treatment. A cost cannot be assigned to a federal award as a direct cost if any other cost incurred for the same purpose in like circumstances has been assigned as an indirect cost under another award.
* Adequately documented. All expenditures must be properly documented with original source documentation that is clearly written and maintained on file with accounting records. Documentation could include purchase orders, requisitions, invoices, travel authorizations, contracts, time and effort records, copies of checks, and etc.
* Determined in accordance with Generally Accepted Accounting Principles (GAAP).
* Not included as a match or cost-share of another federal program, unless the specific federal program authorizes federal costs to be treated as such.
* The net of all applicable credits. Applicable credits refer to reduction of expenditures that operate to offset or reduce the expense of items allocable to the federal award. Examples of such transactions are: purchase discounts; rebates or allowances; adjustments for overpayments; or credits. All such credits received by the district related to the federal award shall be credited to the federal award.

A cost is allocable to a federal award or cost objective if the goods or services involved are chargeable or assignable in accordance with the relative benefits received.

* incurred specifically for the award
* benefits both award and other work and can be distributed in proportions that may be approximated using reasonable methods
* necessary to the overall operation of the entity and assignable to the award in accordance with their part
* can only charge in proportion to the value received by the program

In summary, for a cost to be allowable under a federal grant program, the district ensures it meets all the following conditions:

* **reasonable** in cost
* **necessary** to accomplish the objectives of the grant program
* Aligns to LEA prioritized needs
* bases on an identified need, concern, or area of weakness within the grant program
* appropriate under the authorizing program guidelines
* consistent with the underlying needs of the program in that it benefits the intended population of students or teachers for which the funds are appropriated
* **allocable** to the grant based on the relative benefits received
* authorized or not prohibited under state or local laws or regulations
* consistent with policies, regulations, and procedures that apply to all activities, including other grants and state and local activities
* treated consistently as either a direct cost or indirect cost
* determined in accordance with GAAP
* not used to meet cost sharing or matching requirements of another federal grant (unless specifically permitted in the other program regulations)
* consistent with the terms and conditions of the grant award
* adheres to Period of Performance
* avoids conflict of interest
* follows procurement methods
* budgeted in the approved grant award
* adequately documented with appropriate supporting source documentation
* the net of any applicable credits such as rebates or discounts
* allowable under the federal cost principles
* Remains consistent with the non-federal purchasing procedures
* in most cases, supplemental to the core foundation program of the school (supplement not supplant)

District employees are required to follow these rules for charging these specific expenditures to a federal award.

**Source Documentation**

Source documentation will be aligned to the Federal Program’s specific needs and equity gaps. The LEA ensures the following: program director approval, participants are allowable, training is aligned to needs, training documents are kept on file, and substitutes are for allowable staff and paid out of the correct funding source. The LEA’s internal controls ensure timely payment for travel, and that services were received prior to payment. Source documentation will reflect the period of performance. Common source documentation includes: purchase orders, detailed invoices, travel expense statements, agendas from conferences, contracts for services, attendance rosters and leave forms, etc.

**Equipment Inventory Acquisition and Disposition Procedures**

Any equipment with a shelf life expectancy of one year or more and valued at $100 or more will be maintained in inventory, including pilferable items that include but is not limited to: digital cameras, graphing calculators, DVD players/recorders, iPods, iPads, cell phones, Chromebooks, charging stations, scanners, document cameras, printers, etc.

The acquisition of equipment must follow LEA internal control procedures noted in the federal program procedures manual which include having prior approval of the principal (if applicable) and the federal programs director/coordinator, being based on a need identified in SIP/CLIP, and meeting the requirements of the funding program.

Upon approval by the program director/coordinator, the purchase order will be processed and the order will be placed.  A list of equipment and/or technology items (coded 615, and 616) will be sent to the media specialist responsible for maintaining the inventory***.*** Once items are delivered to the school, the Media Specialist will then enter appropriate information into the WASP Inventory management program. The WASP Inventory management program will include the following information for items on the inventory as applicable (for instance, FAIN identification began in FY16; therefore, any purchases made prior to FY16 would not include the FAIN number in the inventory list):

* description of equipment
* serial number/identification number
* funding source (including FAIN), percentage of funding source
* source of property (vendor)
* acquisition date
* unit cost
* location of equipment
* use of equipment (instructional, professional learning, administration, etc.)
* condition of equipment
* title of equipment (fund source)
* disposition data (date of disposal, sale price, if applicable)

After items are received and entered into the inventory management program, a barcode label is created that includes the following information as applicable (for instance, FAIN identification began in FY 16; therefore, any purchases made prior to FY16 would not include FAIN number on label):

* Barcode
* Funding source
* FAIN number
* School District

One copy of the signed inventory should be kept in the Title I school and another copy in the Title I district office. The inventory must be available for review and evaluation.

Small items such as calculators may be entered as a set as long as the quantity of the set is noted and each individual item is numbered; i.e one of twenty or 1/20, 2/20, etc. Multiple sets will also be identified with Roman Numerals or Letters; i.e. II 1/20, II 2/20, II3/20, etc. Calculator sets are assigned to specific teachers. Other teachers may use the sets as requested, as long as the original teacher keeps a dated record of which teacher has checked them out.

The Clinch County School System has safeguards in place to prevent loss, damage, or theft of equipment. Both school facilities have interior and exterior security cameras installed.

Classroom “sets” of student devices such as laptops, Chromebooks, and iPads are stored in secure, lockable carts designed specifically for that purpose. Each cart is assigned to a teacher. The teacher is responsible for checking the devices in/out to other teachers. The carts should remain locked except when checking devices in/out. Student devices assigned to a cart should be stored in the assigned cart at the end of each day. The teacher to whom the cart is assigned is responsible for ensuring all devices are returned to the cart each day. The media specialist is responsible for periodically spot-checking carts for inventory.

Equipment with a use of professional learning may be stored in a central location such as the media specialists’ office in a locked area. As teachers check in and out equipment, a list is maintained of who has the device, what the device is, an identifying source number for the device, the date the device was taken and the date the device was returned. Teachers and staff members are allowed to check out the devices overnight if needed.

It is acceptable for equipment to be taken off-site by staff members for use as long as the use is for which it was acquired and is allowable by the program. Students may take federally funded equipment off campus that have prior approval by the designee. When equipment is used in a location other than which it is assigned in the inventory system, the person to whom the equipment is assigned must track the equipment by having the individual sign for receipt of the equipment, note the sign out date, purpose of use, and return date of equipment.

If equipment owned by the school system is stolen, a disposition of equipment form should be completed. The principal/director should notify the Director of Operations and local law enforcement to file a report. Upon receipt of this report, a copy should be provided to the Director of Operations, school principal, and technology specialist.  The technology specialist will update the inventory list as applicable.

**Physical Inventory**

Physical inventories of all equipment using the WASP program will be conducted by the media specialist annually. The media specialist will verify the existence, current utilization, and continued need for the equipment and condition of the equipment when completing the inventory. A dated, complete inventory report will be turned in to the program directors and Assistant Superintendent in December with the signature of the person completing the inventory. The media specialist will also periodically spot-check equipment throughout the year.

**Guidelines for Equipment**

All grant funded equipment purchases must be approved by the Federal Programs Director/Coordinator.  All purchases must be in compliance with policies and statutes governing Clinch County Schools.

*Allowable Equipment*—*The Clinch County School District is responsible for assuring that only allowable equipment is purchased.*  To avoid non-compliance, proposed purchase orders will be submitted for review to the appropriate grant director. The Clinch County School District may purchase or lease equipment with federal funds for a one-year period only, if 1) it is reasonable and necessary to operate its federal program efficiently, 2) existing equipment will not be sufficient and 3) the costs are reasonable.

All items purchased as equipment as well as materials and supplies must be accounted for in such a manner as to avoid fraud, waste, or abuse. These purchases will be reviewed as a part of the regular monitoring process.

Work order requests for maintenance are sent by teachers and staff through email. Work orders are checked and tracked by technology support staff and addressed daily. In cases where equipment repairs cannot be requested through normal work order requests, the technology staff will seek guidance from the federal programs director if equipment is permanently damaged or undergoing repair for an extended, unreasonable amount of time.

**Disposition of Equipment**

Equipment items with an acquisition cost/current per unit fair market value of less than $5,000 and are more than three years old may be retained, sold, or disposed of with no further obligation to the GaDOE. The disposition of such items should be noted on the equipment inventory maintained by the LEA. Other equipment items may be retained, sold or otherwise disposed as follows:

* Over $5,000 – may be retained or sold and the awarding agency shall have the right to an amount calculated by multiplying current market value or proceeds from sale by the awarding agency’s share of equipment. In such situations, the LEA will submit the appropriate documentation to the federal programs area consultant for review and guidance.
* Under $5,000 – no accountability but must still formally dispose

IF the equipment is less than $5,000, it may be disposed of at the direction of the Technology Specialist (repurposed, retained, or discarded) with approval from the Program Director.

The Technology Specialist must receive approval from the Program Director prior to disposing of equipment on the inventory list. Disposition records include the equipment’s serial or identifying number; the sale price if applicable; reimbursement to federal program if applicable; whether the items that were not sold were repurposed, retained, or discarded; and a record of the date, reason, and method of disposal. The LEA will keep disposition records for five years after the disposition of the item.

The Technology Specialist is responsible for recording changes in location and condition of equipment in the system inventory database (WASP).

**Federal Programs Travel**

Travel using federal programs funds requires pre-approval (for allowability of participant and activity) by the Federal Program Directors. Teachers requesting travel for an out of county conference/training, must complete the system Professional Learning approval form. Per diem and mileage are paid out of pocket and are reimbursed at cost, no higher than state per diem. Lodging, if applicable, is paid with our system credit card. Post travel expenses are submitted via paper reimbursement form with lodging receipts attached. The Federal Programs Directors/Coordinator authorizes payment on travel reimbursement. No reimbursement will be provided without prior approval by the school and district professional learning director and or federal programs director/coordinator. Payment for any travel expenses is made after the travel is taken.

**Expense** **Reimbursement Statewide Travel Regulations Per Diem Guidelines**

Employees traveling within the State of Georgia or Out of State are paid a per diem amount designed to cover the cost of meals, based on the number of meals per day for which the traveler is eligible. Clinch County follows state guidelines regarding reimbursement rates that can be found on the following website: <https://sao.georgia.gov/travel/state-travel-policy>.

If the conference agenda lists a meal as part of the schedule of events, the Clinch County BOE cannotreimburse the employee for that meal.

Clinch County employees expecting reimbursement for travel expenses must complete an Employee Expense Statement and adhere to the following guidelines:

 1. Use Electronic Employee Expense Statement (system website or email attachment)

 2. Fill out ALL employee information at the top of the expense statement.

 3. Complete ALL parts, i.e.- Purpose, Vehicle tag number, etc.

 4. Date, departure time and arrival time, departure location and arrival location for each

 date must be completed.

 5. Print Employee Expense Statement and send it to the appropriate Federal Program Director.

**State Mileage Allowance**

Mileage reimbursement rate has been changing frequently over the last several years. As a result, the mileage rate to be used should be obtained from referring to the State Travel Guidelines or referencing the rate noted at the bottom of the system’s expense report form. Forms will be updated with the most recent mileage rate and notification will be made to employees. Individuals are encouraged to request the most economical rates when making reservations for lodging. Statewide Travel Regulations were revised to authorize overnight lodging and meal reimbursement on certain occasions when employees are required to work off -site, but within 50 miles of their home or office. This authorization (See The Statewide Travel Regulations) requires agency heads to approve such overnight travel in advance of the function and to keep centralized records of all persons authorized for travel status under this provision. This provision does not authorize persons to claim travel reimbursement for activities which are part of their normal responsibilities. In addition, this provision would not apply for persons who are required to attend evening meetings as part of their normal responsibilities. Federal per diem rates are used in evaluating the reasonableness of out-of-state travel. The Statewide Travel Regulations are now available on the Internet at: <https://sao.georgia.gov/travel/state-travel-policy>.

**Compensation and Leave**

Compensation for personal services will be paid according to the local salary scales. Leave will be earned and awarded in accordance with local policy GARH.

**Period of Performance (2 CFR §200.77; 20 USC §1225)**

Funds are available for obligation, whether they are available to the LEA for a period of 27 months after July 1. This 27-month period includes an initial 15-month period of performance and an automatic 12-month extension permitted under the “Tydings Amendment”. As an example, funds appropriated for FY17 first become available to the states on July 1, 2016, and remain available for obligation through September 30, 2018.

In Georgia, allocations to LEAs are approved by the State Board of Education. Regardless of when LEAs are notified of their grant allocation, grantees may begin to obligate funds beginning as early as July 1 of the Federal fiscal year. When the period of performance for obligation ends, the LEA may not incur any further obligation. The LEA is given 30 days to liquidate (October 31) in order to allow the GaDOE to complete the reporting necessary for the Federal government. Period of performance is programmed into the Consolidated Application and is regulated for Federal programs by Grants Accounting.

**Periodic Certification Procedures**

The designated director of each federal program is responsible for the distribution, collection and maintenance of school level Semi-Annual Periodic Certification forms and Time Log forms for all federal programs. Periodic certification forms will be completed after the first semester and after the completion of the second semester for those teachers and paraprofessionals whose positions are supported entirely by funds from Title I, Part A, Title II, ESSER, or Special Education. These persons will certify that 100% of their job duties were related to activities in compliance with the specific program. Time Log forms should be completed for all district personnel that are paid from federal funds and another funding source. These forms are collected monthly, unless the employee has a fixed daily schedule. If the employee has a fixed daily schedule then the employee schedule will be turned in bi-annually in December and May instead of the Time Log forms. Each designated director/coordinator conducts school visits to verify duties performed by Title I, Title II, ESSER, or IDEA paid personnel are consistent with the job title of the split funded personnel. All signed Time Log forms or a copy of the fixed schedule will remain in the Title I, Title II, ESSER, or IDEA department at the central office . Principals keep copies of Time Logs and/or class schedules at the school. In the event an employee **does not** have a fixed schedule and is paid from federal funds and other funding sources then the employee will complete a Time Log that includes:

Split funded personnel paid based on acceptable time logs.

Split-funded personnel are required to submit monthly time logs reflecting

(a) after-the-fact distribution of the actual activity of each employee;

(b) account for the total activity for which each employee is compensated;

(c) preparation at least monthly and must coincide with one or more pay periods, and

(d) signatures by the employee and dates.

In the event the Federal Programs Coordinator’s salary is split-funded, the time logs will be approved by the Assistant Superintendent or Superintendent. Split funded personnel are paid by percentage of funds designated and approved by the program directors. In the event, the monthly time reflects a 5% variance among programs, the salary will be adjusted and charged to programs appropriately based on actual time worked on each cost objective. Actual time logs are signed by the employee and kept for documentation of compliance. The Federal Programs Coordinator receives technical assistance from DOE personnel. The Federal Programs Coordinator then advises additional split funded personnel of requirements as applicable on an individual basis.

Substitute teachers are an allowable expenditure for approved federally funded professional learning activities. The following is the process for approval and verification of time and effort for substitute teachers:

* Substitute teachers are secured for allowable activity and signs in at each school.
* Monthly reports are sent to the appropriate federal program directors who approve the expenditure, designates the federal program or other account the substitute should be paid from, signs off, and submits to payroll.
* Principal, or designee at building where expenditure occurs also signs off, verifying direct knowledge that allowed expenditure occurred.

For regular leave such as sick and personal, it is local practice for substitutes to be paid from the same account from which the teacher is paid. Therefore, if a Title I funded CSR teacher is sick, his/her substitute would be paid with Title I funds.

**Hazard Pay**

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

Schools receiving Title I Distinguished School/Reward School awards are notified by e-mail and are provided the budget amount, if awarded. Title I principals are also provided the same information from GADOE that the Federal Programs Coordinator receives regarding use of funds and the required questionnaire. Schools have the option to meet as committees to determine the use of funds; however, the final decision belongs to the principal, who is responsible for the submission of the budget. Schools submit their budgets electronically to the Federal Programs Coordinator who approves requested expenditures at the district level. If there are questionable submissions, principals are contacted and asked to revise the budget worksheet. Each school’s allocations, requests, and questionnaires are uploaded through the consolidated application and when approved, schools are notified to begin the purchasing process. Items purchased through federal funds must be permanently marked with the appropriate federal fund code and the fiscal year the items were purchased. The Federal Programs Coordinator monitors the expenditures by signing off on requisitions, which must be for the items requested on the budget worksheet. Expenditures are also monitored through monthly budget status reports and through on-site visits to ensure items purchased are available and used as requested.

**Cash Management**

* **Draw Downs**:

The Director of Finance is responsible for drawing down federal funds. After the original budget is approved, the Director of Finance prepares requests for reimbursement (DE0147) in the GaDOE portal through the GAORS module based on prior expenditures. Timely drawdowns are made to help ensure the LEA does not exceed the maximum allowable carryover. A report from PC Genesis is generated so funds requested are on a reimbursement basis only. In the rare event that funds should be requested before they are spent, it is for immediate (no more than three days’ prior) needs only. The Director of Finance has received both formal and informal training and is familiar with the Federal and State Grants guidelines of Cash Management/Payment.

The district requests for reimbursement of funds so that excess cash balances are not maintained. In the rare event that excess cash balances exist, they will be promptly withdrawn and returned to the GaDOE. Subject to 2 C.F.R. Part 200, the district may keep up to $500/year of interest earned on excess federal fund advances to cover administrative costs. All other amounts must be returned to the GaDOE.

* **CONTROL ACTIVITIES**

The Director of Finance is familiar with the guidelines concerning cash management/payment, and that program costs need to be paid for by the entity funds before requesting reimbursement from the GADOE.

\*The accounting department closes the books each month to ensure that the expenditures are recorded in the right month and to the correct fund source.

\*The Director of Finance runs a PC Genesis report to determine the funds expended to date for various federal programs.

\*The Director of Finance refers to the revenue vs. expense comparison reports generated from PC Genesis at the end of every month for expenses, revenues, and budgeted amounts.

\*The Director of Finance prepares the supporting documentation for drawdowns and forwards it to the appropriate program director who reviews the documentation and approves/signs off on the amount to be requested, which is equal to the expenditure printout minus any previous drawdowns.

\*The Director of Finance then creates a DE0147 and informs the program directors who subsequently submits the DE0147**.**  The supporting documentation and corresponding DE0147 is kept on file to justify funds drawn.

Significant aspects of controls are tested as part of the Test of Controls sections of the Georgia Department of Audits program.

* **INFORMATION AND COMMUNICATIONS**

Federal and GADOE guidelines regarding cash management activities are available for training and reference purposes. Variances between expected and actual cash disbursement of funds and drawdown of federal funds are reviewed by our Director of Finance. Copies of the following are kept in the Director of Finances’ office:

\* “Financial Management for Georgia Local Units of Administration”**.**

\* Completion reports for the previous fiscal year

\*Accounting records to support the results of outlays (expenditures indicated in the completion report)

* **MONITORING**

The Director of Finance keeps a check on balances for each grant with the Federal Program Directors overseeing the process. The Federal Program Directors and Director of Finance monitor drawdowns to help ensure students receive the maximum benefits of the federal programs and the LEA does not exceed the maximum allowable carryover per program. A year-to-date general ledger is generated by the Director of Finance for the Federal Program Managers to monitor expended funds versus budgeted funds. The Board’s policies and procedures help to ensure correct Cash Management activities. The organization understands the need for appropriate cash management.

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

**Reservation of funds – Set-Asides**

After receiving notification of the Title I, Part A amounts from GaDOE, reservations in each budget are set aside for required components such as parent involvement, professional development, and homeless students. Administrative costs are also part of the set-asides, which are not part of the schools per pupil amounts.

**Parental Involvement Set-Aside**

Clinch County receives more than $500,000 in Title I, Part A funds, our system allocates an additional set-aside for Parental Involvement which is well over the 1% requirement. If our schools decide to use their share of the 1% reservation for parental involvement under Section 1118(a)(3)(c) of ESEA to support a district-level project for parents, then the participating Title I principal must sign the district-wide Parent Activity/Project assurance. The parents from the schools must be involved in deciding how the funds will be allotted and how they will be spent.

**Homeless Children and Youth**

Clinch County School System coordinates plans with the provisions of the McKinney-Vento Homeless Assistance. One percent of our Title I budget is set-aside for Homeless Children and Youth in order to comply with the requirements of Section 1113(c)(3)(A) of ESEA.

**Neglected and Delinquent Children**

Currently there are no residential facilities for neglected children in the Clinch County School District.

**Rank Ordering and Allocation Procedures**

* Clinch Elementary and Clinch Middle both have Title I Schoolwide Programs, with Clinch Elementary receiving a higher per pupil amount than Clinch Middle. Clinch High is not a Title I school.
* The LEA has only one school per grade span: Clinch Elementary (grades PreK – 4), Clinch Middle (grades 5-7), and Clinch High (grades 8-12).
* The LEA uses school lunch data for poverty determinations.
* The LEA uses the eligible attendance area worksheet embedded in the Title I consolidated application.
* Clinch Elementary and Clinch Middle are CEP schools. Clinch High is NOT a CEP school.
* The LEA uses the 1.6 multiplier for CEP schools.
* For Clinch Elementary and Clinch Middle (both CEP), the LEA multiplies the number of students identified by direct certification in a school by the 1.6 multiplier and divides by the enrollment in the school. The direct certification number is provided to the Title I Director by the School Food Services Manager on the Title I provided worksheet.
* For FY 2022 or until the end of the national state of emergency, Clinch County Elementary and Clinch Middle School (due to the pandemic) are operating under the Seamless Summer Option (SSO). All students at these schools eat free under SSO.
* For Clinch High (not CEP), the LEA uses the number of FRM applications and divides by the enrollment in the school to obtain the poverty percentage. The FRM application data is obtained through the previous year’s Free and Reduced Lunch Eligibility (FRL001) report.
* For FY2022 or until the end of the national state of emergency, Clinch County High School is also operating under Seamless Summer Option (SSO). All students at CCHS eat free under SSO.
* Schools are rank ordered for per pupil allocations based on the percentage of low-income students. The LEA allocates a higher per-child amount to schools with higher poverty rates than it allocates to schools with lower poverty rates.

**Equitable Services for Private School Participants**

     Private schools within the county as well as those outside the county who serve Clinch County Students are invited annually, through the Equitable Services 4 Private Schools (ES4PS) in the SLDS platform, to consult regarding participating in Title programs and services. To date, no private school has chosen to receive any Federal Program monies.

These procedures would be used for eligible students at any Private School that chose to participate:

A meeting is held to present information about the programs available to students in private schools. All federal programs directors are invited to 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. Meetings would then be scheduled every two months to discuss the progress and process of the Title I services. Meetings with the private school director would include an agenda with sign in. Minutes would be taken during the meeting and the private school director is provided a copy of those minutes prior to leaving the meeting.

**Parent and Family Engagement Procedures**

**Parent Notification**

Clinch County Schools notifies parents about School Designation Status through our system website, social media sites, and local newspaper. Our Elementary and Middle Schools are Title I designated schools. We currently have no schools designated as Comprehensive Support & Improvement, Promise, or Targeted Support Improvement schools.

**Technical Assistance**

Technical Assistance is provided to the Parent Engagement Coordinator, Principals, and staff concerning all Parent Engagement requirements and practices. Technical Assistance is provided through various forms of communication (face-to-face meetings, emails, phone calls, etc).

**Coordination and Implementation of Family Engagement Requirements**

The Federal Programs Coordinator meets periodically with all school administration and parent coordinators to discuss parent involvement successes and concerns. The system also utilizes the results of the school parent surveys to review the effectiveness of the parent involvement practices. Each school submits a school parent plan that is revised on an annual basis.

Parents/families are involved in planning, revising, and implementing the required components of the Title I program including parental involvement activities, school improvement plans, CLIP, and schoolwide plans. This may be accomplished through school council meetings, Family Connection Collaborative meetings, school planning sessions, and/or district-wide needs assessment/consolidated application planning sessions. Parents may be contacted by sending home invitations, phone, email, or in person. Sign in sheets and agendas are maintained for such activities. The school council meetings are open to the public and are announced via the school social media sites, marquee sign, and/or website.

**LEA Family Engagement Plan**

Our LEA Family Engagement plan is developed jointly and agreed upon with parents. Input is provided at our Title I Parent Feedback Meetings held annually, in May and August. Upon completion of the plan, it is distributed to all children at the school level via paper copies and school/system website.

**School Level Family Engagement Plan**

Each Clinch County Title I school jointly develops and distributes parent and family engagement plans. Parents are notified of the plans in an understandable and uniform format, to the extent practicable, provided in a language the parents can understand. The plans are updated/revised annually to meet the changing needs of parents and schools. Information regarding the development, revision, and distribution of the plans are listed below.

* Each Title I school conducts meetings for parents of children and family members in Title I schools to develop, discuss, revise, and agree upon the school parent and family engagement plans on an annual basis.
* All parents and family members have the opportunity to provide input on the parent and family engagement plans.
* Plans are available for review and input on the school and/or district website for parents who cannot attend the meetings.
* Documentation is kept on all opportunities for input on the plans.
* The Family Engagement Coordinator will provide guidance and a checklist to schools for developing and revising the plans.
* The Title I Coordinator will review the district and each school plan using the checklist to ensure requirements are met.
* The district and school parent and family engagement plans are distributed to parents via the school/district website and paper copies are sent home with each student.
* Hard copies of all plans are also available in the Parent Resource Room located at the schools.

**School-Parent Compacts**

Each Title I school develops a written School-Parent Compact in conjunction with the district/school’s Parent and Family Engagement Plan. The compact, which is a written agreement between students, teachers, and parents, is developed by all stakeholders and outlines how parents, teachers, and students will share the responsibility for improving student achievement. All compacts are reviewed and revised annually in the spring of the year. An invitation to participate in the review is sent home to all parents in the school and meeting dates are given in school newsletters, posted on the school’s social media site, and sent through the phone message system. Additional meetings are conducted with teachers and students

to receive their input regarding their roles within the compact.

Parent compacts include the responsibilities for all parties and are signed by teachers, students, and parents at the beginning of the year and serve as a clear reminder of the agreement for all to share in the responsibility for student learning. The School-Parent Compact is distributed to parents at the beginning of the school year along with the District/School Parent and Family Engagement Plan. The School-Parent Compact is also available on the district website and in the Parent Involvement Resource Center. Copies of the signed parent compacts are kept on file at the school in order to be utilized during parent conferences to continue to build the bond between the school, parents, and students.

**Parent Resource Center**

Each elementary and middle school has a parent resource center. A wealth of materials and resources are available to parents for use in the center or at home with their child(ren). Computers are available for parents to access PowerSchool for checking grades, and to utilize software such as Study Island, MobyMax, IXL, Books, tapes, videos, games, and a variety of other materials and electronic resources have been purchased for the parents. Purchases may be based upon parent requests on the parent involvement surveys and/or workshop evaluations.

Schools are required to notify parents of the availability of the Parent Resource Center and their resources. Parent notification is typically achieved through a notice in the parent-student handbooks, fliers, at open house and parent/ teacher conferences and/or websites.

**Building School Staff Capacity**

Clinch County Schools is required to document (at least two or more times per semester at each Title I school) training for school staff that will help build capacity in engaging and communicating with parents.

Example topics include:

● The value and utility of contributions of parents

● How to reach out to, communicate with, and work with parents as equal partners

● Implement and coordinate parent programs

● Build ties between parents and the school

● Staff reviews feedback from parents and discusses other activities that encourage and support

parents in more fully participating in the education of their children

● Train staff on sending information to parents in a format and, to the extent practicable, in a

language the parents can understand

**Building Parent Capacity**

The Clinch County School District recognizes the importance of building parents’ capacity to be involved in school and their child’s education. Greater parental involvement is crucial to enable students to learn more, to achieve higher academic standards, and to successfully transition into the workforce. It is the intent of all parent involvement activities in the Clinch County Schools to encourage and support the efforts of home, school, and community in improving the educational opportunities of all children.

Each Title I school shall provide assistance to parents of children served by the school or local educational agency, as appropriate, by:

● helping them understand such topics as the challenging State academic standards, State and local academic assessments, what is Title I and parent rights, how to monitor a child’s progress, and how to work with educators to improve the achievement of their children

● providing materials and training to help parents to work with their children to improve their

children’s achievement, such as literacy training and using technology (including education about the harms of copyright piracy)

● coordinating and integrating parent involvement programs and activities with other Federal, State, and local programs, including public preschool programs, and conducting other activities, such as parent resource centers, that encourage and support parents in more fully participating in the education of their children

● ensuring that information related to school and parent programs, meetings, and other activities is sent to the parents of participating children in a format and, to the extent practicable, in a language the parents can understand

● providing such other reasonable support for parental involvement activities under this section as parents may request

● implementing an effective means of outreach to parents of English learners

**1% Reservation of funds**

The district will ensure that all Title I parents have an opportunity to be involved in the decisions about the use of the 1% reservation of funds. The Federal Programs Coordinator schedules and conducts a Title I meeting in the spring of each year. Parents are invited by publishing an invitation on the system website, in the local newspaper, and on school social media sites.

**School Improvement 1003 (a) /Corrective Action/Restructuring**

There are no schools currently identified as Comprehensive Support & Improvement, Promise, or Targeted Support Improvement schools as determined by the Georgia Department of Education.

Currently, our Elementary and Middle schools are functioning as Schoolwide programs. Technical assistance is provided by the Federal Programs Director/Coordinator in developing, implementing, revising and monitoring the schoolwide plans and the schools’ budgets. The schoolwide plans are developed using the state provided checklist for the schoolwide program.

**Description of procedures for ongoing review of school-level implementation of section 1003(a) funds.**

Not applicable

**School Improvement 1003 (g) (SIG)**

Not applicable

**Procedures for Resolution of Audit and Cross-Functional Monitoring Findings.**

The Clinch County Board of Education follows the state guidelines in regard to the resolution of audit findings as listed below:

**Schedule of Findings and Questioned Costs**

After the on-site monitoring the SEA provides a comprehensive report to the LEA within 30 business days of the visit. The report contains recommendations, findings, and required actions that provide an analysis of the implementation of the programs monitored. Upon receipt of the SEA report, Clinch County Schools will:

* Respond within 30 business days to any required actions
* Any required documentation will be clearly labeled
* If written procedures are required, they will be attached as a separate document

Clinch County Schools will make every effort to eliminate these findings in subsequent years.

 **Services for Homeless Children and Youth**

**LEA Homeless Policy**

**ADMINISTRATIVE REGULATION**

**Procedures to Implement The McKinney-Vento Homeless Assistance Act**

**and Policy JBC(1)**

To the extent practical and as required by federal law through the McKinney-Vento Homeless Assistance Act, the LEA will work with homeless students and families to provide stability in school attendance and other services. Special attention will be given to ensuring the enrollment and attendance of homeless students not currently attending school.

The Superintendent shall designate an appropriate staff person to be the district’s liaison for homeless students and their families. The McKinney-Vento liaison shall be responsible for compiling data collected on homeless children and youth and unaccompanied youth, determining and arranging for needed services, advising the Superintendent of rules or procedures that may be barriers to serving homeless children, monitoring academic achievement, facilitating enrollment, and settling disputes.

**Definitions**

The McKinney-Vento Homeless Assistance Act identifies “homeless children and youth” as those individuals who lack a fixed, regular and adequate nighttime residence, and includes-

1. Sharing the housing of other persons due to the loss of housing, economic hardship, or similar reason; living in motels, hotels, trailer parks, or camping grounds due to the lack of alternative adequate accommodations; living in emergency or transitional shelters; or are abandoned in hospitals;
2. Having a primary nighttime residence that is a public or private place not designed for or ordinarily used as a regular sleeping accommodation for human beings;
3. Living in cars, parks, public spaces, abandoned buildings, substandard housing, bus or train stations, or similar settings; or
4. Are migratory and live in the conditions set forth in items a, b, and c, above.

**Identification**

In collaboration with school personnel and community organizations, the LEA homeless liaison will identify children and youth experiencing homelessness in the LEA, both in and out of school. The liaison will provide training and information to school personnel (including school registrars and secretaries) on possible indicators of homelessness, sensitivity in identifying families and youth who are experiencing homelessness, and procedures for forwarding information indicating homelessness to the liaison. The school registrar will have *all* families complete the Student Residency Questionnaire, as part of the required school enrollment forms. Community partners in identification may include: the Division of Family and Children Services and/or other social service agencies, faith-based organizations, medical providers, truancy and attendance officers, and legal services.

**School Selection**

Children and youth experiencing homelessness shall remain at their schools of origin to the extent feasible, unless that is against the parent’s or youth’s wishes or not in the best interest of the child. Students may remain at their schools of origin the entire time they are experiencing homelessness, and until the end of any academic year in which they become permanently housed. The same applies if a child or youth loses his or her housing between academic years.

Feasibility shall be a child-centered determination, based on the needs and interests of the particular student and the parent’s or youth’s wishes. Potential feasibility considerations include:

* Safety of the student.
* Continuity of instruction.
* Likely area of family’s or youth’s future housing.
* Time remaining in the academic year.
* Anticipated length of stay in a temporary living situation.
* School placement of siblings.
* Whether the student has special needs that would render the commute harmful.

**Enrollment**

The school will immediately enroll any child or youth experiencing homelessness. Enrollment may not be denied or delayed due to the lack of any document normally required for enrollment, including:

* Proof of residency.
* Transcripts/school records (The enrolling school must contact the student’s previous school to obtain school records. Initial placement of students whose records are not immediately available can be made based on the student’s age and information gathered from the student, parent, and previous schools or teachers.)
* Immunizations or immunization/health/medical/physical records
* Proof of guardianship.
* Birth certificate.
* Any other document requirements.
* Unpaid school fees.
* Lack of uniforms or clothing that conforms to dress codes.

If necessary, the school will refer students to the liaison to assist with obtaining records/documents needed for enrollment.

Unaccompanied youth **must** also be immediately enrolled in school. They may either enroll themselves or be enrolled by a parent, non-parent caretaker, older sibling or the LEA homeless liaison.

**Transportation**

Transportation will be provided to and from the school of origin if requested by the parent/guardian/unaccompanied youth. Transportation shall be provided for the entire time the child or youth has a right to attend that school, as defined above, including during pending disputes. The length of the commute will be considered in determining the feasibility of placement in the school of origin based on potential harm to the student. Parents and unaccompanied youth should be informed of this right to transportation before they select a school for attendance.

Transportation requests shall be processed and transportation arranged expeditiously. If the student experiencing homelessness is living in the school system but attending school in another system or attending school in the school system, but living in another, the school system will follow the McKinney-Vento Homeless Assistance Act statute to determine who must arrange transportation. Disputes should not result in a homeless student missing school. If such a dispute arises, the school system will arrange transportation and immediately implement the procedures for the dispute resolution.

**Services**

Children and youth experiencing homelessness, including unaccompanied youth, shall be provided district services for which they are eligible comparable to services offered to other students in the school selected, including: transportation; Title 1, Part A; Special Education and related services and programs for English Language Learners; vocational and technical education programs; gifted and talented programs; school nutrition programs; and any other school programs offered to students.

Students experiencing homelessness will qualify for free breakfast and lunch immediately upon enrollment. The Homeless Liaison will submit student names and identification numbers to Food Services staff.

Evaluations of children and youth experiencing homelessness suspected of having a disability shall be given priority and coordinated with students’ prior and subsequent schools as necessary, to ensure timely completion of a full evaluation. If a student has an Individualized Education Program (IEP), the enrolling school shall immediately implement it. Any necessary IEP meetings or re-evaluations shall then be conducted expeditiously. If complete records are not available, IEP teams should use good judgment in choosing the best course of action, balancing procedural requirements and the provision of services. In all cases, the goal will be to avoid any disruption in appropriate services.

The school system will follow state procedures to ensure that youth experiencing homelessness and youth who are out of school are identified and accorded equal access to appropriate secondary education and support services. The homeless liaison will assist the school in making such referrals, as necessary.

**Disputes**

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

The school where the dispute arises shall provide the parent or unaccompanied youth with a written explanation of its decision and the right to appeal and shall immediately refer the parent or youth to the homeless liaison, who may consult with the Superintendent as needed. If the dispute remains unresolved at the district level, the parent may request a review of the dispute and the school district’s decision by the Georgia Department of Education, in accordance with the dispute resolution guidelines and procedures outlined in the Department’s Title I Directors Handbook, which is available on its web site.

**Services for Foster Care Children**

The LEA Homeless Liaison will serve as the point of contact coordinating with local DFCS. This individual will assume responsibility for communication and collaboration with CM and ESM (DFCS POC). This will ensure the smooth implementation of provisions outlined in ESSA to include: Best Interest Determinations; appropriate and timely transportation plans for children placed out of the zone of their school of origin; and, immediate enrollment and records transfer. The LEA POC will facilitate training for LEA staff with regards to the unique challenges of children in FC, monitor attendance and progress of foster children enrolled in LEA, and ensure effective and confidential data collection and sharing.

1. Coordination will occur between Case Managers (CM), Education Support Monitor (ESM-DFCS POC), Homeless Liaison (HL-LEA POC), Foster Parents (FP), and CASA regarding foster children entering and exiting care, changing placements, enrollment, withdrawal, and making best interest determinations. 2.Cost effective plans will be explored first and may include the following: -Foster parent transports child to school of origin (within 25 miles round trip) -Foster parent transports child to nearest school transportation pick up location -LEA will follow existing plan for transporting foster children with disabilities. If above options are not feasible and additional costs are incurred, LEA and DFCS will share transportation costs, (see section II-D). 3. In event of dispute, LEA and DFCS will defer to LEA Federal Program DIR and DFCS County DIR for final determination of resolution. During dispute, LEA will arrange for and provide transportation in accordance with ESEA section 111(c)(5)(B)(i).

LEA and DFCS will ensure transportation is not a barrier to the educational stability of children in foster care. If there is difficulty reaching an agreement on how to pay for additional transportation costs these steps will be followed:

1. LEA will assume financial responsibility for costs incurred as result of rerouting school buses while DFCS assumes financial responsibility for other extraordinary costs, such as those associated with reimbursing FP for travel, or cost of contracting with local transport companies.

2. Initial transportation planning will occur at the lowest level between CM, ESM (DFCS POC), and HL (LEA POC). FPs and CASA will be included as appropriate. Disputes will be forwarded to LEA Federal Program Director and DFCS County Director for resolution.

3. Final determination of how to pay for additional transportation costs will be made by the LEA Transportation Director.

4. Daily attendance will not be impacted by transportation disputes.

In the event that additional transportation costs are unavoidable, LEA and DFCS will share transportation costs. DFCS will assume financial responsibility for extraordinary costs such as contracting with transportation companies or paying FPs to transport farther than 25 miles. LEA will assume financial responsibility for costs associated with re-routing LEA transportation. 1-LEA will reroute transportation to pick up children at the nearest bus stop or foster home and transport directly to school of origin. 2-LEA will reroute transportation to pick up a child at an agreed-upon point at the county line if the child is placed in a neighboring county. 3-DFCS will arrange payment to FP for transportation farther than 25 miles round trip 4-DFCS will utilize existing contracts with transportation companies to provide transportation to school of origin or to agreed upon point at county line when child is placed in neighboring county.

**Services for Neglected and Delinquent Children-NOT APPLICABLE**

Clinch County does not have any N & D programs or schools.  However, should new N & D facilities open within our geographic boundaries, then the students would be served.  Consultation would occur between the Title I Director and the N & D program or school.  Funding for students residing at the institution is based upon the number of students residing in the institutions for neglected children.  The funding, calculated from the Annual Neglected and Delinquent Survey, provides the GADOE with current information on the location and number of children living in the institution for neglected children.  The information is used to compute the Title I neglected or delinquent allocations for school districts so that eligible children in the institutions can be provided Title I funded educational services.

The survey must include children and youth who are ages 5 through 17 years and live in the institution for at least one day during a 30 consecutive day counting period with at least one day of the counting period being in October.  Funding is also to ensure that neglected children, those in need of care due to abandonment, neglect, or death of their parents or guardians, have the opportunity to meet the state’s challenging academic content and student achievement standards.  The Department of Human Resources (DHR) serves youth who are committed to or voluntarily placed in their custody due to abandonment, neglect, or the death of their parents or guardians.

Neglected and Delinquent students are identified through surveys from community agencies, telephone, and online contact with state and local facilities, and through the local coordinator.  The information will be collected on an annual basis and visits will be made to the local facilities or juvenile justice agencies.  No neglected or delinquent institutions are identified in the Clinch County area for this fiscal year.  When neglected or delinquent students are identified educational, mentoring, and social services will be provided by the Clinch County Board of Education as needed.  This will include academic books, supplies, and equipment based on need.

**Title IV, Part A - Student Support and Academic Enrichment**

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

1. provide all students with access to a well-rounded education,
2. improve school conditions for student learning, and
3. improve the use of technology in order to improve the academic achievement and digital literacy of all students.

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

The Rural Education Initiative or 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. It consists of two separate programs - the Small, Rural School Achievement (SRSA) program and the Rural and Low-Income Schools (RLIS) program.

The RLIS program is an initiative that provides grant funds to rural LEAs that serve concentrations of children from low-income families. Under the RLIS program, the U.S. Department of Education awards funds by formula to State Education Agencies (SEAs) to provide subgrans to eligible LEAs to support a range of authorized activities to support student achievement.

Clinch County Schools currently receives RLIS grant funds, which are primarily spent on technology and supplemental instructional software programs. Each year Clinch County Schools is required to submit an Annual Evaluation Report reporting the district’s use of grant funds.

**Title II, Part A**

Data is collected and reviewed by Title II, Part A Director regarding the recruitment and retention of highly qualified and effective teachers and leaders; the highly qualified status of core academic teachers and paraprofessionals; student access to experienced and effective teachers and leaders, and student access to comparable class sizes. A survey administered in the spring targets teachers, including those who teach students with varied needs, and paraprofessionals and addresses the following equity components: ability to meet the diverse needs of learners and factors affecting retention. In addition, input on areas in need of improvement is solicited from school and district leaders during monthly Administrative meetings; from school teams during Data Analysis meetings; and from parent and community stakeholders during School Council meetings, and community conversations. Survey data and other stakeholder data is reviewed and analyzed throughout the year, during subsequent School Improvement sessions held in the early summer. Results help formulate professional learning plans, non-negotiable goals, the Equity Plan, major IIA funded activities and all budgetary decisions for the upcoming school year.

**Annual Needs Assessment**

Clinch County Schools conducts an annual needs assessment each year. The process is one that collects and examines information about system and schoolwide issues and then utilizes that data in structured decision-making that allows stakeholders to determine priority goals, develop a plan, and allocate funds and resources in an effort to improve student achievement.

**Annual Needs Assessment Components:**

**1**. **Professional Learning** – professional learning for leader development, teacher development, paraprofessional development, and professional growth is determined by the Federal Programs Needs Assessment administered each spring. Professional learning activities are analyzed. In addition, other professional learning needs are identified through the comprehensive needs assessment/improvement processes conducted at the school and system levels. Those processes include data analysis (assessment/achievement disaggregated by subgroups, surveys, discipline, attendance, other), root cause analysis, upcoming initiatives, and examination of data from other criteria being monitored/measured.

**2**. **Personnel-** recruitment, retention, and effectiveness are documented by the Title IIA Director. The CCBOE practice is to only hire teachers who are qualified for the vacancies listed. Clinch County posts all vacancies on TeachGeorgia, the CCBOE website, and in the local newspaper. Each school in the Clinch County Schools System implements a teacher mentor program for new teachers. A one-day teacher orientation is provided and each new teacher is paired with an experienced, quality teacher for his/her first year.

**3**. **Factors That Impact the Work Environment-** Climate information from stakeholder surveys is reviewed. To ensure support for continuous improvement, Clinch County annually reviews retention data, discipline data, attendance data, and other various forms of data that would impact the work environment, gathers feedback from stakeholders, and develops plans and strategies to support staff.

**4. Title II, Part A Administration-** January through June Clinch County reviews effectiveness data, equity action plan, internal controls, school data, audit reports, and stakeholder surveys in order to review and implement a Comprehensive Needs Assessment. Stakeholders from all federal programs, assistant superintendent of curriculum and learning, finance director, and principals are invited to participate and/or provide input.

**Equity Action Plan**

The Clinch County Equity Action Plan is revised each year using data variables provided by the GaDOE as part of the Comprehensive Needs Assessment. The data variables will be analyzed to determine two equity gaps along with corresponding interventions to be implemented for each equity gap. The Equity Action Plan is submitted for approval as an attachment to the CLIP. The Assistant Superintendent of Learning/Title IIA Director, instructional coach, superintendent, and federal programs coordinator are responsible for monitoring the implementation of the interventions, and the analysis of the effectiveness of each intervention implemented. The Equity Action Plan is published on the district’s website for public review. The Equity Action Plan is also shared with school leaders who, in turn, collect feedback for revisions from various stakeholders. Source documentation (meeting agendas, sign-in sheets) of stakeholder involvement and feedback as well as implementation of selected equity interventions (agendas, sign-in sheets, training documents, etc.) is maintained by the Title II, Part A Director and/or federal programs coordinator.

**Determining the Effectiveness of IIA funded activities**

Title II, Part A, funded activities are determined each year based on guidance for the authorized use of funds, needs identified, and funds allocated. Activities selected are those most likely to address the needs identified in the Needs Assessment which are included in the Equity and Effectiveness plans, and are most likely to produce a substantial, measurable and positive impact on student academic achievement. A monitoring plan is created that includes the IIA components, need/s being addressed, the activities selected, the data to be collected to determine effectiveness, the position of the person responsible for collecting the data and coordinating the review/analysis, and the timeline established for data collection/analysis. Effectiveness is determined, in part, by observation (i.e. of implementation of initiative); by rating of artifacts (TKES, formative & summative assessment data, surveys/other feedback, etc); by results showing proficiency, achievement and/or growth; and other.

**Scientific research base or Evidence base for Professional Learning Activities**

Clinch County Schools reviews all professional learning activities to ensure that there is a scientific research base or evidence of success in increasing student achievement prior to approving use of Title II A funds. Proposed activities are submitted to the Teaching and Learning staff first to determine appropriateness and compliance prior to submitting to the IIA Director/Coordinator for approval.

**Professional Qualification of Paraprofessionals**

Paraprofessionals who work in a program supported by Title I, Part A funds (Schoolwide Program or Targeted Assistance Program) must meet “highly qualified” requirements. “Highly qualified” paraprofessional requirements do not apply to those working in pre-kindergarten classrooms unless the position is funded by Title I, Part A. Georgia requires all paraprofessionals to be “highly qualified.”

Requirements for Paraprofessionals

All paraprofessionals must have:

High School Diploma OR it’s equivalent AND evidence of:

1. Completed at least 2 years of study at an institution of higher education; or

2. Obtained an associate's (or higher) degree; or

3. Passed the appropriate state paraprofessional assessment.

Georgia Paraprofessionals

All Georgia paraprofessionals must hold a valid state paraprofessional certificate issued by the Georgia Professional Standards Commission.

Note: An educator holding a valid Teaching Certificate in Induction- Pathway 1, 2 or 3, Professional, Lead Professional, and Advanced Professional Certificates is considered “highly qualified” to serve in a Paraprofessional position and does not need to also hold a Paraprofessional Certificate.

Two Years of Study

Two years of study at an institution of higher education requires completion of a minimum of 60 semester hours or 90 quarter hours at a GaPSC approved, accepted institution of higher education.

Paraprofessionals – Definition

A paraprofessional is an individual with instructional duties. Individuals who work solely in non-instructional roles, such as aides, food service, cafeteria or playground supervision, personal care services, and non-instructional computer assistance are not considered to be paraprofessionals for Title I purposes. The requirements do not apply to individuals who work with special education students performing non-instructional duties, such as assisting with mobility and bodily functions. The requirements do not apply to individuals with: (a) primary duties to act as a translator or (b) duties consisting solely of conducting Parental Involvement Activities. (See Title I, Part A, Section 1119 c-g.)

Requirements for Paraprofessionals in Non-Title I Schools

While Federal requirements apply only to paraprofessionals employed in Title I-supported programs, all Georgia paraprofessionals must hold a valid state certificate issued by the GaPSC. To be eligible for the clear renewable paraprofessional certificate, the applicant must:

Be employed as a paraprofessional in a Georgia LEA. The request for issuance of the certificate must be submitted electronically to the GAPSC from the employing LEA using the Paraprofessional Automated Certification (PAC) system.

Have an associate’s degree or higher from an accredited, GaPSC accepted institution of higher education in any subject OR have completed two years college coursework (60 semester hours) OR have passed a PSC-approved paraprofessional assessment. If eligibility is established through the assessment, the applicant must also hold a high school diploma or GED equivalent.

**Parent Right to Know qualifications of teachers and paraprofessionals**

Parents are informed of their rights to know the qualifications of their children’s teacher and paraprofessional. This information is made available through the student handbook and website.

Included in all notifications is a specific contact person name, telephone number, and email address.

* All notices and information are in a uniform and understandable format, including alternative formats upon request and, to the extent practical, in a language that parents understand. All notifications must include a specific contact person name, telephone number, and email address. Parents may request and receive information regarding:
* Whether the teacher has met state qualifications for the grade levels and subject areas in which the teacher teaches.
* Whether the teacher is teaching under emergency or other provisional status.
* The baccalaureate degree of the teacher and any other graduate certification or degree held by the teacher and the field or discipline of the certification or degree.
* Whether the student is provided services by paraprofessionals.

Parent notification is not required for the following:

* For teachers who do not teach core academic subjects in Title I school-wide or targeted assistance programs.
* For paraprofessionals who are not highly qualified.

**Title II, Part A Specific Procedures for Services for Eligible Private School Children**

**AFFIRMATION OF CONSULTATION**

 **WITH PRIVATE SCHOOL OFFICIALS**

|  |
| --- |
| Under the Every Student Succeeds Act and §200.63 of the Title I regulations require that timely and meaningful consultation occur between the local education agency (LEA) and private school officials prior to any decision that affects the opportunities of eligible private school children, teachers, and other educational personnel to participate in programs under this Act, and shall continue throughout the implementation and assessment of activities under this section.  |

**Clinch County, currently, does not have any private schools within our geographic boundaries.** However, in the event a private school opens within our geographic boundaries of the LEA, the guidelines below would be followed.

In accordance with Department of Education guidance and with ESEA Sec. 9501, private schools are afforded the opportunity to participate in federal programs.

Clinch County contacts appropriate officials of all private schools within the geographic boundaries annually to determine if they want their teachers to participate in the Improving Teacher Quality State Grants program, regardless of whether or not those officials have recently indicated any interest in program participation. The IIA Coordinator collaborates with the Federal Program Director to include the requisite information about Title II, Part A services in all private school notifications.

To meet its general record-keeping responsibility, Clinch County Schools documents that: (a) representatives of private schools were informed of the availability of Improving Teacher Quality State Grants services; (b) the needs of private and public school teachers were identified as part of a LEA-wide needs assessment; (c) private school officials were consulted and provided an opportunity for input into the planning of the LEA's program activities; and (d) the system approved a budget that permitted equitable participation for private schools.

As part of the application process, Clinch County Schools assures that they will comply with Section 9501 of ESEA (regarding participation by private school children and teachers). Clinch County Schools will consult with appropriate private school officials who have responded indicating their interest/participation during the design, development, and implementation of the professional development program.

Consultation on the delivery of services will also include a thorough consideration and analysis of the views of the private school officials on the provision of contract services through potential third-party providers.

Under section 9501(d) of ESEA, Clinch County Schools will maintain control of the program funds as well as title to all materials, equipment, and property purchased with Federal funds. Given the fiscal responsible of the district, to the extent that it does not put undue burden on the private school(s), Clinch County Schools will require source documentation for expenditures sufficient to determine that all activities are allowable, reasonable and necessary and that fund recipients are eligible under Title II, Part A guidance. By law, Clinch County will abide by applicable statutes (ESEA), regulations (Title II, Part A and Title IX, Part E) and shall use Federal funds in accordance with those statutes, regulations, plan and applications including supervision, fiscal control and fund accounting procedures. (§76.700, §76.701, §76.702) Use of funds for religion is prohibited. (§76.532)

Should private schools request services through IIA, all procedures and guidance on determining allocations, use of carryover funds, eligibility for stipends and record keeping as determined by federal or state statute and regulation will be followed.

**Internal controls -- accurate, allowable, and properly allocated to support time and effort records**

All expenditures for Title II, Part A, are reviewed and approval is only granted for allowable participants and activities as outlined in the federal award.

**Travel**

The IIA Coordinator exercises discretion and judgment to ensure conference costs are appropriate, necessary and managed in a manner that minimizes costs to the federal award. Participants should not exceed state rate, or conference rate, except in cases of limited availability at the time of booking due to unforeseen safety reasons. Travel reimbursement requests are reviewed by two individuals for compliance with federal, state and system travel regulations prior to payment. (See travel guidance in Federal Program Procedure Manual.)

Clinch County Schools will only pay for allowable advertising relating to the recruitment of personnel required.

Substitute teachers are an allowable expenditure for approved Title IIA professional learning activities. The following is the process for approval and verification of time and effort for substitute teachers:

* Substitute teachers are secured for allowable activity and signs in at each school.
* Monthly reports are sent to the Title IIA Director who approves the expenditure and signs off.
* Principal at building where expenditure occurs also signs off, verifying direct knowledge that allowed expenditure occurred

**Stipends**

Summer professional learning activities are established by the building administrators in collaboration with the Title IIA coordinator. Professional learning funds may be expended for the reasons specified in State Board of Education Rule 160-3-3-04. Stipends may be awarded only if the following conditions exist:

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

The IIA Coordinator reviews all recommendations for trainings where a stipend is to be paid or instructor is to be hired. The IIA Coordinator provides final approval on documents submitted by instructors for course completers and subsequent documents submitted to the finance office for payment. Course instructors who are employees of Clinch County Schools are paid and must be off contract in order to be eligible. The IIA Coordinator contracts with instructors and approves documents submitted to the finance department.

All obligations and expenditures must occur within the established period of performance to be eligible for funding.

**Internal Controls regarding the drawdown of funds**

Title IIA, Part A program operates on a reimbursement method.

Drawdowns are made periodically, If there have been actual disbursements (i.e. payments already made) for Title II, Part A. The IIA Director in collaboration with the Director of Finance works to ensure that drawdowns are timely and that payment must minimize the time elapsing between the transfer of funds and disbursement by LEA. Documentation is reviewed periodically by the IIA Director.

**Written internal controls regarding financial management**

Title II, Part A follows the procedures set forth in the Federal Program Procedures Manual addressing allowability, procurement, oversight, conflict of interest, and financial management standards.

The IIA Coordinator maintains oversight and ensures that contractors perform in accordance with the terms, conditions and specifications of their contracts/or purchase orders. If there are issues in meeting the terms of a contract, the IIA Coordinator has the authority to cancel.

Title II, Part A follows the conflict of interest procedures set forth on page 26 of the Federal Programs Procedures Manual.

**Purchased Equipment**

Currently no Title II, Part A funds have been or are being used to purchase equipment.

If such practice changes, the Title II, Part A procedures will comply with those in the Federal Program Manual and will ensure that:

* the equipment is used for authorized purposes of the property during the period of performance, or until the property is no longer needed for the purposes of the project
* property records will be maintained to include the person responsible for maintaining documentation (in this case, the IIA Director).
* there will be a reconciliation of physical inventory and property records
* there will be adequate safeguards to prevent loss, damage, or theft of the property to include investigation if loss, damage, or theft occur (i.e., locks on equipment storage devices, security cameras, sign-in & out records, etc.)
* that system procedures will be followed to keep the property in good condition
* that any sale of property will be done so to get the highest possible return
* and that any disposition of equipment will be done so in accordance with state laws and procedures and use the Clinch County Schools Fixed Asset Disposal Form. Procedures for lost equipment are to verify such by the principal or Director and note on inventory.

**Leave Procedures for Professional Learning**

Professional leave forms must be submitted to the appropriate Federal Programs director/coordinator prior to attending any professional learning or professional activity opportunity. Employees of the Clinch County school system must make sure that they have prior approval to attend any workshop. All Title IIA funded professional learning must have documentation of research/evidence base and be available for review.

Staff members requesting professional leave must follow these procedures.

1. Complete the system Request for Leave form. All professional leave will be coded as a 2.

2. Fill in the number of days and dates for leave.

3. List reason for leave (be specific, i.e math conference or other professional learning activity)

4. Sign and date form.

5. Submit to Principal/Supervisor for signature.

The approval process begins with the applicable school/system level administrator followed by approval from the federal program director to determine allowability and available funds. Professional learning/Title IIA director provides final approval. Documentation is kept by the Federal Programs coordinator.

Certain federal programs require documentation upon return which includes agendas, sign-in sheets, and redelivery of information to other staff (if applicable). All required documentation is kept on file.

**Title III, Part A**

Clinch County School System does not receive federal funds for Title III, Part A. If our school system was to ever receive federal funds, then we would follow all federal guidelines and would assume responsibility for making sure all requirements are met.

Procedures/Process for EL identification

For students new to U.S. schools, upon enrollment in our school system, the parent is given the ESOL & Title III Required Home Language Survey form to complete. If the parent indicates a language other than English on one of the 3 required the Enrollment Clerk notifies the school level assessment coordinator and the district EL director. The school assessment coordinator administers the state designated screener (WIDA) within 30 days of enrollment and the student qualifies for EL support or does not based on screener data. Parents are notified of EL status and ESOL services within 30 days at the beginning of the school year or two weeks during the year through the Clinch County School System Initial Notification of Determination for ESOL Services letter and a copy of the student’s screener report. Student status is reported in the state student information system.

For transfer students not new to U.S. schools, prior enrollment records reviewed, EL history in GUIDE platform, SLDS assessment history, ELP records (initial HLS, screener, annual ELP assessments) are reviewed within 30 days, and student’s EL status or post-exit EL status is identified per transferring state or school system’s records. Parents are notified of EL status and ESOL services within 30 days at the beginning of the school year or two weeks during the year and student status is reported in the state student information system.

Per ESEA/ESSA Section 3113(b)(2), Georgia requires that LEAs screen all potential EL students for EL eligibility within 30 days of enrollment in a school in the state, regardless of when students enroll during the school year.

**Notice to Parents of English Learners:**

Title I requires that every LEA that uses funds under either Title I or Title III for services to ELs must provide a parent with notification that outlines their child’s identification as an EL and placement in an LIEP.

**Title I, Part C – Migrant Education (MEP) Services**

Services for migrant students may vary with regards to time and frequency. The first migrant students to be served will be the Priority for Services (PFS) students. These students will receive instructional support at least twice a week. The time of day when services are provided will be at the best time of day for the students and/or families. SSPs schedules will be flexible to cover all needed services afforded those in the migrant program. PFS students are those whose schooling has been interrupted because of their mobility and who are otherwise failing or at risk of failing to meet state academic standards. Indicators for PFS:

* Migratory children who have made a qualifying move within the previous 1-year period.
* Scored below established proficiency level on one or more of the Georgia Testing Program assessments.
* During most recent and/or current semester has failing grades in one or more core academic content areas (K-8) or course(s) required for graduation (9-12).
* Insufficient credits for promotion or graduation.
* Is working at grade level below grade placement.
* Is over age for grade placement by one or more year (has been retained, started school late, under-schooled, etc.)
* Is identified as an English Learner (EL).
* Is a DO and OSY Profile form completed?

 A comprehensive needs assessment (CNA) is held annually based on parent, student, and teacher surveys along with student achievement data, and priorities are determined based on feedback and data obtained. Members of the CNA team/PAC meet in April/May and review the Clinch County Migrant Education Program, student achievement data, professional learning needs, and services that need to be offered to migrant families. An ID & R implementation plan for the next school year is developed and uploaded to the GaDOE website for approval by the state.

**PAC Meetings**

During pre-planning, the Title IC Director and Migrant SSP schedule Parent Advisory Council (PAC) meeting dates. PAC meetings are held three times per calendar school year. The SSP sends letters, makes phone calls/text messages and/or makes home visits before each PAC meeting to ensure participation. Written information presented at all PAC meetings is in a language the participants can understand.

**Implementation Plans**

Implementation plans are developed based on local and state student assessment data. The local Title IC Director observes each Implementation Plan and submits the observation in the GADOE Formstack online platform. A program evaluation is submitted annually to the GaDOE Regional Migrant Education Program Office for each IP. CCBOE provides ongoing professional development for the SSP and provides documentation of attendance. The SSP may also participate in system, school, and regional professional development as appropriate.

**Migrant Preschool Children**

Clinch County identifies and supports pre-school aged students who reside in the district. Pre-school readiness is a standard component of these services and helps students and parents prepare for the formal educational setting of the regular classroom. The SSP ensures maintenance of records of the migrant students and helps expedite the transfer of records as needed. The SSP works with families to coordinate migrant services with other community services (such as health or mental health). The SSP collaborates with the district Family Engagement Coordinator to organize parent involvement activities at the school and district level. The SSP schedules after school and summer tutoring sessions/inclusion as needed and assesses the priority of services for students. His/Her schedule is on file in the Title I Coordinator’s office and with the Director of Migrant Education.

**Use of Title I, Part C Funds (Migrant)**

**All purchasing for the Clinch Migrant program will follow the rules and guidelines of the Clinch County Board of Education and meet Georgia Auditing Guidelines.**

* All purchase orders are completely filled out by the SSP or Migrant Director requesting the materials.
* Purchase orders are submitted to the Migrant Director for approval.
* After final approval of the purchase order by the Superintendent, it is sent to the company for purchase, unless it is an online order. If it is an online or a local purchase, the signed purchase order will be sent back to the Migrant Resource Coordinator.

**The following procedures are implemented upon receipt of the materials:**

* The SSP or Migrant Director inventories the shipment and checks off items received on the packing slips.
* The packing slip is then submitted to the Account Receivable Clerk.
* Once the Accounts Receivable Clerk receives the invoice from the company, he/she pays the bill.

**The following procedures are implemented for local purchases:**

* Staff member goes to the local business and purchases the materials with the approved purchase order/credit card.
* Staff member signs the receipt to acknowledge receipt of the materials and submits it to the Accounts Receivable Clerk.
* The Accounts Receivable Clerk pays the bill after receiving the invoice from the company.

***Appendix A***

***Complaint Form for Federal Programs***

Please Print

|  |
| --- |
| Name of (Complainant): |
| Mailing Address: |
| Phone Number (home):Phone Number (work): |
| Person/department complaint is being filed against: |
| Date on which violation occurred: |
| Statement that the Clinch County School System has violated a requirement of a Federal statute or regulation that applies to an applicable program (include citation to the Federal statute or regulation) (attach additional sheets if necessary): |
| The facts on which the statement is based and the specific requirement allegedly violated (attach additional sheets if necessary): |
| List the names and telephone numbers of individuals who can provide additional information. |
| Please attach/enclose copies of all applicable documents supporting your position. |
| Signature of Complainant:                                              Date: |
| Mail or deliver this form to:Clinch County School SuperintendentClinch County Schools46 South College StreetHomerville, Ga 31634 |
| Date Received: |
| Date of Response to Claimant: |