

Wayne County Board of Education



Federal Programs and Operations Handbook

2018-19

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Dr. Jay Brinson, Superintendent

Ms. Toni Williams, Chief Financial Officer

PURPOSE OF HANDBOOK

The purpose of this procedural handbook is to provide a systematic approach to managing the rules and guidelines of all federal, state, and local programs. With one set of expectations for all Georgia's System of Continuous Improvement is a framework that is a comprehensive approach to district and school improvement efforts. Communication and collaboration are key in developing cohesion and alignment between the district and schools. A comprehensive needs assessment is conducted with all programs represented. The various representatives from the district and school leadership teams will complete the CLIP (Comprehensive LEA Improvement Plan) and utilize external stakeholders in the process. The school leadership teams are expected to align their school improvement plans with the SMART goals of the District Improvement Plan.

MISSION OF WAYNE COUNTY SCHOOLS

**Our mission is to empower all students
to reach their highest levels of achievement.**

BELIEFS OF WAYNE COUNTY SCHOOLS

- Every person is worthy of respect.
- Every person has the right to learn and work in a safe, nurturing environment.
- Every child learns when actively involved in educational experiences that reflect the uniqueness of each student's abilities.
- Every child will be encouraged and supported to become a lifelong learner in preparing for a rapidly changing world.
- Everyone learns best when they are engaged participants in their learning.
- Literacy is the foundation of education.
- Family, school and community are responsible for the growth, development and the success of its students.

SECTION 1: FISCAL AND OPERATIONS MANAGEMENT

Funds Requests

The Chief Financial Officer prints out a budget report monthly and completes a “Requisition of Funds” form and submits to the Program Director for approval by the 10th of each month. Expenditures are reported as of the last day of the prior month. Estimated payroll is based on the payroll from the prior month. Outstanding purchase orders are reviewed. Estimated payroll and outstanding purchase orders are combined and used as the estimated expenditures for the subsequent month. The Program Director reviews the financial report and “Requisition of Funds” form for accuracy, signs off on the “Requisition of Funds” form, and returns to the Chief Financial Officer prior to funds being requested. The Chief Financial Officer enters information into GAORS. The superintendent’s secretary approves the request in GAORS. A copy of the DE0147 is emailed to the program director.

Cash Receipts – Board of Education

Checks received by mail are receipted by the receptionist, a deposit form is completed by the Superintendent’s Secretary, and the deposit is taken to the bank by the Benefits Coordinator. Checks are never receipted and deposited by the same personnel. All federal and state program payments, reimbursements, and draw-down requests are deposited electronically. Reports are printed out from the GAORS system by the Chief Financial Officer on a monthly basis as documentation of funds that have been deposited into the operating account. The Payroll Coordinator posts deposits into the accounting system within 10 days of deposit. The Chief Financial Officer approves all deposits with her initials and date. Electronic funds can be matched to draw-down request forms and are accounted for during the bank reconciliation process.

Bank Reconciliations

All non-school bank statements are to be received unopened with reconciliation activities completed by the Payroll Coordinator within 15 days of receipt. After reconciliation is complete, the Chief Financial Officer and Superintendent sign each bank reconciliation attesting that the reconciliation is complete and that cashed checks were reviewed for fraudulent activity. Original paperwork is filed by month in the Accounting Department.

Annual Audit

The Wayne County School System is audited annually by the Georgia Department of Audits. The audit includes the following: the financial statements for the governmental activities, each major fund, the district's aggregate remaining fund information, and consideration of internal controls over financial reporting that are appropriate for each fund. The Superintendent, Chief Financial Officer, and the Board Chairman meet with the auditor-in-charge to discuss findings or recommendations at the exit conference. Following the exit conference, the district receives a written copy of all findings and recommendation points. If audit findings are identified in the Audit Report, the Chief Financial Officer will write a Corrective Action Plan. All necessary action will be taken to follow the Corrective Action Plan in order to timely resolve the finding. The Corrective Action Plan must be filed with the Financial Review Department at the Georgia Department of Education.

In the event a finding is related to a particular program rather than general financial matters, the CFO meets with the program director to discuss and establish a corrective action plan (CAP). The CFO submits required written responses to all findings, which are included in the final audit report made available to the public.

In addition to the audit by the Georgia Department of Audits, a separate review of School Accounts is completed by the accounting staff. Findings are discussed with the principals and bookkeepers.

Completion Reports

Copies of completion reports for the previous fiscal year will be kept on file in the Finance Department. Accounting records to support the results of outlays (expenditures indicated in the completion report) will be kept on file. Copies of completion reports are filed annually so that total expenditures reported to GaDOE will be kept on file. The Federal Programs Director will run budget summary and detailed expenditure reports for all federal funds.

Annual completion reports are prepared with function/object details and are submitted on a timely basis. Completion reports submitted via the state GAORS system are automatically subject to function/object comparative edits with the recently filed Consolidated Application budget.

Completion reports for the previous fiscal year, including applicable budget reports and year-to-date transaction reports, are filed electronically in the Accounting Department. A copy of the completion report is provided to the director of each grant. The original paper copy is also on file in the Accounting Office.

What is Fraud, Waste, or Abuse?

Fraud - The intentional deception perpetrated by an individual or individuals, or an organization or organizations, either internal or external to federal, state, or local governments, which could result in a tangible or intangible benefit to themselves, others, or the district or could cause detriment to others or the district, state, or federal governments. 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 - The intentional or unintentional, thoughtless or careless expenditure, consumption, mismanagement, use or squandering of district, state, or federal resources to the detriment or potential detriment of the district. Waste also includes incurring unnecessary costs as a result of inefficient or ineffective practices, systems, or controls.

Abuse - Excessive or improper use of a thing, or to employ something in a manner contrary to the natural or legal rules for its use. Intentional destruction, diversion, manipulation, misapplication, maltreatment, or misuse of resources. Extravagant or excessive use as to abuse one's position of authority.

All policies regarding ethics and fraud, waste and abuse are outlined in the current Personnel Handbook. Each year each district employee must sign the Personnel Handbook affirmation. Signed affirmations are kept on file in the Human Resources Director's office.

Examples of fraud, waste, and abuse are as follows:

- Personal use of district-owned vehicles
- Long distance personal calls
- Personal use of district-owned supplies or equipment
- Violations of system and/or state procurement
- Excessive or unnecessary purchases
- Falsifications of official documents (time-sheets, leave reports, travel vouchers, etc.)
- Contract fraud
- Conducting personal business on district time
- Inappropriate expenditures
- Embezzlement

Ethics. An educator entrusted with public funds and property shall honor that trust with a high level of honesty, accuracy, and responsibility. Unethical conduct includes but is not limited to:

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

Procedures and Responsibilities

- 1) Anyone suspecting fraud should report their concern immediately to their direct supervisor. From there, the direct supervisor should contact their direct supervisor as the report moves through the chain of command.
- 2) Any employee of Wayne County Schools (temporary staff, full-time staff, and/or contractors) who receives a report of suspected fraudulent activity must report this information within the next business day. Employees have the responsibility to report suspected fraud. All reports can be made in confidence.
- 3) The Wayne County Board of Education shall conduct investigations of employees, providers, contractors, or vendors.
- 4) Periodic communication through meetings should emphasize the responsibilities and channels to report suspected fraud.

Complaint Procedures

Grounds for a Complaint. Any individual, organization, or agency (complainant) may file a complaint with Wayne County Schools if that individual, organization, or agency believes and alleges that a local educational agency (LEA) is violating a federal statute or regulation.

Federal Programs for Which Complaints Can Be Filed

- Title I, Part A: Disadvantaged Children or Academic Achievement Awards
- Title I, Part C: Migrant Education Program
- Title II, Part A: Teacher and Leader Effectiveness

- Title III, Part A: English to Speakers of Other Languages
- Title V, Part B: Rural and Low Income
- Title IV

Complaints Originating at the Local Level. As part of its Assurances within the ESEA program (Elementary and Secondary Education Act, as reauthorized by the Every Student Succeeds Act [ESSA]), an LEA accepting federal funds must have local written procedures for the receipt and resolution of complaints alleging violations of law in the administration of covered programs. Therefore, a complaint should not be filed with the Georgia Department of Education until every effort has been made to resolve through local written complaint procedures. If the complainant has tried to file a complaint with Wayne County Schools to no avail, the complainant must provide the Georgia Department of Education written proof of their attempt to resolve the issue with Wayne County Schools.

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

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

The complaint must be addressed to:

**Human Resource Director
Wayne County Schools
710 W. Pine Street
Jesup, GA 31545**

Once the complaint is received by Wayne County Schools, it will be copied and forwarded to the appropriate Director.

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

- The date Wayne County Schools received the complaint.
- How the complainant may provide additional information.
- A statement of the ways in which Wayne Schools may investigate or address the complaint.
- Any other pertinent information.

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

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

Right of Appeal. If an individual, organization or agency is aggrieved by the final decision of Wayne County Schools, that individual, organization, or agency has the right to request review of the decision by the Georgia Department of Education. For complaints filed pursuant to Section 9503 (20 U.S.C.7883, complaint process for participation of private school children), a complainant may appeal to the Georgia Department of Education no later than thirty (30) days from the date on which the complainant receives the Letter of Findings. The appeal must be accompanied by a copy of the Wayne County Schools' decision and include a complete statement of the reasons supporting the appeal.

Computer Security

E-Mail and Internet Use. The Wayne County School System provides computers, networks, Internet, and phone services to support the educational mission of the school system and to enhance the curriculum and learning opportunities for students and school system staff. Employees are to utilize school system technology for school-system-related purposes and performance of job duties. Incidental personal use of school system technology is permitted as long as such use does not interfere with the employee's job duties and performance, with system operations, or other system users. "Incidental personal use" is defined as use by an individual employee for occasional personal

communications. Employees are reminded that such personal use must comply with the employee code of ethics and all other applicable policies, procedures, and rules.

The school system retains control, custody, and supervision of all technology owned or leased by the school system. The school system reserves the right to monitor all activity performed on school system technology by employees and other system users.

Employees have no expectation of privacy in their use of school system technology, including e-mail messages and stored files.

The employee is responsible for his/her actions and activities involving school system computers, network, internet, and phone services, as well as his/her computer files, passwords, and accounts. Failure to comply with board policy is grounds for discipline up to and including discharge. Any questions concerning this policy should be directed to a supervising administrator or Human Resources Department.

Records Retention

The Wayne County School System provides an effective records program that meets all operational, legal, and regulatory requirements compliant to federal, state, and local laws.

Retention Procedures

RECORDS RETENTION		
Document	Retention Number of Years	
	System Records	School Records
Time Sheets	3	
Leave Sheets	3	
AP Check Packages		5
Purchase Orders		5
Posting Registers		5

Bank Statements & Reconciliations		5
Bank Deposit Files		5
Vendor Statements		5

Disaster Recovery Plan

All of the accounting systems of the Wayne County Board of Education are backed up by Backup Exec. This service is provided by Symantec. This backup takes place each night and backs up the Harris Solutions servers and the Softdocs servers. The backup is stored offsite. Data can also be accessed locally, as long as an internet connection is available. If our entire school system does not have internet access, a home internet connection can be used to access our data. The most critical time-sensitive function would be the generation of payroll checks. If the decision is made to remain in Wayne County, it may be necessary to purchase some items for check processing.

Assessment Security

All roles and responsibilities outlined in the Student Assessment Handbook (SAH) are incorporated into the Wayne County School System Testing Plan. The SAH provided by the Georgia Department of Education (GaDOE) and the test specific guides published and periodically revised on the GaDOE website serve as the guiding principle and remain the final authority on testing in the State of Georgia. The SAH is printed and reviewed annually by Test Coordinators. Teachers have access to the electronic version through the GaDOE website when available.

Georgia’s Assessment Program

- ACCESS
- GAA
- Milestones
- GKIDS

Roles and Responsibilities

1. Copies of the roles and responsibilities from the SAH are scanned in and emailed to the following people:
 - Superintendent

- ESOL Director
 - Special Education Director
 - Principal
 - School Test Coordinator (SchTC)
2. Copies of the examiner, proctor, and school test coordinator’s testing manuals are placed in a training notebook so that they may be reviewed with school test coordinators at the test security meeting at the beginning of the year.

Receipt, Verification and Distribution of Materials

1. Materials are delivered to the System Test Coordinator.
2. The System Test Coordinator counts the materials to verify all have been received.
3. Materials are stored in a secure location. The only people who have a key are the System Test Coordinator, the STC secretary, and the Curriculum Director.
4. Following any pre-test administration meetings with all school test coordinators, materials are counted by STC, and meetings are scheduled for the SchTC to come in to the office to pick up their materials. The test materials are signed in and out by a material transfer log (see appendix).
5. Send rules to SchTC for examiners who go from one site to another.
6. Check “report delivery” “status reports” then “daily cumulative status reports” prior to sending in tests.

SECTION 2: PURCHASING AND PROCUREMENT

Procurement Procedures

The Superintendent or his/her designee is authorized to approve any and all purchases from budgeted funds of less than \$100,000.00. For any purchase in excess of that amount, the Superintendent shall provide written documentation to the Board of Education justifying the recommendation.

At all times, the Superintendent shall follow any mandated processes required by state law, set forth in State Board of Education rules or procedures or regulations of the State Department of Education.

Wayne County Schools is committed to the establishment of policies for sound fiscal management in the area of procurement.

The Board of Education (“Board”) shall take advantage of programs funded by the federal government as it deems appropriate and in the best interest of the School District (“District”).

All purchasing and construction contract awards within the Wayne County School System shall be in accordance with Georgia law, the regulations of the State Board of Education, and local policy and procedure. Construction contracts, including, but not limited to, those in excess of One Hundred Thousand Dollars (\$100,000.00), shall be awarded based on competitive bids or proposals to the responsible and responsive bid or proposal that is determined to be the most advantageous to the School District.

In all purchasing decisions, the performance of the provider with the School District, performance of the provider with other customers, the convenience of the provider to the District, including whether the provider is a local business, other benefits offered by the provider, or any other factor which may make the acceptance of a particular proposal from a particular provider more advantageous to the School District may be considered in evaluating proposals or bids. It is preferred that yearly contracts shall run concurrent with the Wayne County School System fiscal year (July 1-June 30). All yearly contracts shall follow the “sealed bids or proposals” guidelines.

The Superintendent or other designated central office administrator shall be authorized to make purchases of budgeted expenses in the amount of \$5,000.00 per unit or less without prior Board of Education approval.

Purchases involving a purchase price of Five Thousand Dollars (\$5,000.00) or more per unit shall be based upon solicitation of at least three (3) competitive quotations. Purchases involving a purchase price of \$10,000 or more per unit shall be based upon a competitive process (sealed bids or proposals).

Formal Sealed Bids or Proposals. The following requirements must be met in all instances in which formal, sealed bids or proposals are invited:

- Clear, detailed, and concise written specifications are to be provided to the bidder.
- The bid or proposal package shall include the date, time, and location of the Board Meeting at which the sealed bid will be opened.
- No changes are to be made to specifications or instructions verbally unless followed up with a written amendment to the original information to all known bidders.

- All bidders or proposers must be provided a minimum of three (3) business days to supply a bid for item(s) or service(s) for which bids are being requested.
- All sealed bids will be delivered or mailed to the Superintendent or other designee at the Board of Education Office and will remain sealed until opened publicly at the designated Board Meeting. The Superintendent or other designated central office administrator shall ensure the bid specifications have been met.
- The Wayne County Board of Education and its employees reserve the right to request clarification of any item to which the vendor responds.

Exclusions. The following purchases, regardless of amount, may, if budgeted for, be purchased upon the approval of the Superintendent or his/her designee(s):

- Items listed and priced in the current and active Federal Government Services Administration contracts, State of Georgia or other state government contracts, and other local government agency bid contracts may be purchased for the quoted price without public advertising and bidding.
- Instructional, vehicular, equipment, and facility emergency needs which, if not accomplished immediately, (a) would result in health/safety hazards to students and/or school employees, (b) would result in additional damage, and/or (c) would cause interruption of the instructional program, may be purchased with the approval of the Superintendent or his/her designee.
- Textbooks, films, slides, video tapes, newspapers, library books, reference materials, subscriptions, computer programs, or other instructional media from the publisher, distributor, or agent may be purchased with Superintendent or his/her designee approval.
- Tests and test scoring services of a standard examination from the publisher or licensed agent may be purchased.
- Arrangements for maintenance service from the original vendor or authorized agent of installed equipment or products if the same cannot be competitively bid may be purchased.
- Additional purchase of like equipment, material, supplies, services, rentals, or leases previously approved may be made provided the additional order is at the same or less price and is placed within the same fiscal year of the original bid.

- Workers Compensation and Risk Management Insurance claim payments made under existing legal, policy, or contract requirements.
- Purchased services in which the number of contractors is limited due to inability to comply with evidence of worker's compensation.

All awards of contracts or purchasing agreements shall be contingent upon the availability of funds whether from the school system budget or from special grants of federal, state, and local funds.

Segregation of Duties-Expenditures

1. A staff member will generate a purchase requisition through Electronic forms processing software and will forward to the Principal or Designee for approval. At least two competitive quotes should be attached to purchase requisitions that exceed \$5,000. The quotes are maintained electronically in the DoceScan system.
2. The Principal or Designee will forward the purchase to the Federal Programs Director.
3. The Federal Programs Director will verify that all expenses are reasonable, allocable, and allowable and necessary under the specified federal program. The Federal Programs Director will verify the account number and submit the purchase requisition to the Chief Financial Officer (Business Office) if approved. If denied, the purchase requisition may be returned via Electronic forms processing software back to the originator of the purchase requisition.
4. The Chief Financial Officer will verify the account number, confirm that funds are available, approve the purchase requisition, and generate a purchase order.
5. Once the purchase order is generated, a copy will be returned to the originator and a copy forwarded to the vendor to be processed.
6. Once the order is received, the packing slip/receiving report is approved with a date and signature of the person checking the order off. The packing slip/receiving report is forwarded to Accounts Payable for payment. Accounts Payable enters the voucher, prints the check and the Receptionist mails the checks to the vendor.
7. Monthly reports will be analyzed for expenditures against budgeted funds. The Federal Programs Director will compare detailed monthly expenditure reports to the consolidated application monthly with the Chief Financial Officer to ensure that expenditures are in accordance with the approved consolidated application.

Consultants, Contracts, Purchased Services

Contracts are required for all consultants and purchased services. Agreements are entered into between Wayne County Schools and the consultant or purchased service. Each contract should contain duties that are specific to the contract or purchased service. The rate of pay and/or stipend should also be provided on the contract. An agreement should be made by the contractor to be fingerprinted if contracted services are provided to students. The Principal and supervising Director should sign off on all invoices/contracts/timesheets prior to the issuance of payment for services. Documentation associated with contracted and purchased services should be maintained at the school site sufficient to maintain an accurate account of expenditures. Once the Principal forwards documentation for services to be paid to the supervising Director, the Director is then responsible for forwarding request for payment to Accounts Payable Clerk or Payroll Coordinator. The contract for services, time logs, etc. must be maintained and kept in the director's files for a minimum of two complete years.

Tutoring. All tutoring requires a logic model indicating selection and exit criteria for students, method of monitoring (small group, software, etc.), step-by-step procedures for implementation, and personnel providing oversight. Before tutoring occurs, an agreement must be signed providing the following information: grade and content area to be tutored, dates and times of tutoring sessions, total hours per week, date tutoring begins, and date tutoring ends. Agreement must be signed by Principal and tutor and a copy submitted to the Federal Programs Director.

Tutoring documentation is to be maintained on a monthly basis with sign-in and sign-out times of students being tutored. Tutoring documentation is to be signed by tutor and Principal/Director at the end of each month and attached to the electronic timesheet in the electronic forms processing software. After electronic approval is provided by the Principal/Director, it is forwarded to the Federal Programs Director who provides oversight to the specific fund from which the service will be paid. The Federal Programs Director and principal provide oversight in ensuring that all contractors and/or tutors' work is complete. The Principal and Federal Programs Director should sign off on all invoices/contracts/timesheets prior to the issuance of payment for services. Documentation associated with contracted and purchased services should be maintained at the school site sufficient to maintain an accurate account of expenditures. Once Principal forwards documentation for services to be paid to the Federal Programs Director, the Director is then responsible for forwarding

request for payment to Payroll Coordinator. The contract for services, time logs, etc. must be maintained and kept in the director's files for a minimum of two complete years.

Conflict of Interest

Conflict of Interest 2 CFR 200.318(c)(1)-a situation in which a person is in a position to derive personal benefit from actions or decisions made in their official capacity.

Grantees and subgrantees must maintain a written code of conduct governing the performance of employees that award and administer contracts (2 CFR 200.318(c)(1)) Employees of the Wayne County School System who are engaged in the selection, award, and administration of contracts shall abide by the following:

- No employee, office, or agent may participate in the selection, award, or administration of a contract supported by a Federal award if he or she as a real 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.
- Officers, employees, and agents of the Wayne County School System may neither solicit nor accept gratuities, favors, or anything of monetary value from contractors, potential contractors, or subcontractors.

Violations of these standards will result in reporting of said personnel to the Superintendent of Schools and if appropriate, local authorities. Any misconduct could result in suspension, loss of employment, and other consequences that are applicable by law. The employee shall disclose in writing to his or her immediate supervisor a personal financial interest, a business interest, or any other obligations or relationship that in any way creates a real or potential conflict of interest with the proper discharge of assigned duties and responsibilities or that creates a potential conflict of interest with the best interests of the school system.

Sole Source Vendors

Use of competitive selection is not required when the vendor is considered a sole source vendor. A vendor is considered a sole source vendor when the following criteria is met:

- The item/service is only available from a single source

- The public emergency for the requirement will not permit a delay resulting from competitive solicitation
- The Federal awarding agency or pass-through entity expressly authorizes noncompetitive proposals in response to written requirements from the non-federal entity
- After soliciting a number of sources, competition is determined inadequate

SECTION 3: PROFESSIONAL DEVELOPMENT

Stipends

The Wayne County School System abides by Georgia Department of Education Rule 160-3-3-.04 as it relates to Professional Learning. Stipends are defined as “funds awarded by an LEA to certified personnel and paraprofessionals for having successfully completed learning opportunities that have occurred at any time during the fiscal year outside of the employee’s normal contract/work hours”. Compensation should be awarded only for allowable activities within the scope of the award. Payment must be reasonable and necessary to the program. Stipends may be awarded only if the following conditions exist:

1. There is evidence that the knowledge, skills, practices, and dispositions gained from the professional learning activity are aligned to an approved individual plan, or a school or LEA initiative and/or product, and/or specific goals, and;
2. There is evidence that the knowledge, skills, practices, and dispositions developed through participation in or facilitation of professional learning have been implemented/demonstrated in the classroom/work setting; and
3. Participation occurs beyond regular contract hours, days, or school year.

Before payment can be made for services provided, a “Stipend Authorization Form” should be completed and signed, which includes the description of services provided and the rate of pay OR specified product(s) and rate of pay, signature of person approving/overseeing work, and signature of Federal Programs Director. A timesheet should be attached to the “Stipend Authorization Form” before forwarding to the Federal Programs Director. Once the “Stipend Authorization Form” is approved, the documents should be forwarded to the Payroll Coordinator to process payment.

State and federal funds designated for professional learning shall not be used to pay stipends to school board members or to school council members who are not employees of the LEA.

Professional Development Activity Request

The Professional Development Activity Request form is required when personnel is seeking approval to travel and attend professional development activities which will incur expenses. The PDAR should be originated and fully completed with attached agenda (or other documentation providing information about the professional activity) by the participant of the activity. The PDAR is then forwarded to the Principal and/or designee for approval. The Principal or designee should not approve the form unless the activity directly relates to the School Improvement Plan. The form is then routed to the appropriate Director (depending on funding source). The Director affirms appropriate funding is available and then approves and forwards to the Chief Financial Officer. District approval of the PDAR should **always** be documented **before** travel and participation in professional development occurs. Personnel originating the Professional Development Activity Request will receive an email showing approval as requested is processed.

AESOP/SAMS

All employees will be required to enter absences into AESOP in advance of all absences, including missed days for professional development.

Travel Expense Reports

The Wayne County School District follows the Statewide Travel Regulations set by the State Accounting Office. Statewide Travel Regulations can be accessed on the school district's website on the Finance page.

All employees must submit their expense report through Electronic forms processing software and attach all required receipts.

The expense report must be fully completed with correct name, home mailing address, date to/from (origination and destination point of travel {work location is origination point unless mileage is less when traveling from home}), purpose of travel (specificity is needed, especially for local travel), departure and arrival times (only required for travel where meals are being reimbursed), correct account numbers, and appropriate approval. Receipts for applicable lodging, registration, and other expenses must be attached in pdf format and contain short filenames. A "Professional Learning

expenses according to these regulations. Upon granting approval of expense submissions, approvers are certifying:

- That expenditures are appropriate, that the amounts are reasonable, and that all travel regulations have been followed,
- That funds are available and that reimbursement is being charged to the correct account number(s),
- That documentation is complete and accurate and that all required receipts have been submitted.

SECTION 4: REVENUE

Grants: Donations, Gifts, and Competitive Grants

The Wayne County School District seeks to maximize its sources of revenue for the benefit of students, employees, and taxpayers.

The District recognizes and appreciates that organizations and/or individuals may wish to award grants, contribute gifts, make donations, or provide sponsorships to the schools in the district. The system reserves the right to determine if the grant, gift, donation, or sponsorship is appropriate and may reject those it deems inappropriate or unsuitable.

To be acceptable, a grant, gift, donation, or sponsorship must:

1. Have a purpose consistent with the beliefs/philosophy of the school system;
2. Not convey hidden costs to the school system;
3. Place no undesirable restrictions on the Board;
4. Not be inappropriate or harmful to the best education of students;
5. Not imply endorsement of any business or product or belief; and
6. Not be in conflict with any board policy, administrative rule, state law, or district financial procedures.

The district, including schools, is encouraged to apply for competitive grant funding from sources including local, state, and federal government, as well as non-governmental agencies and organizations. For the purpose of this rule, competitive grants are defined as those grants that are

awarded through an application process in which multiple grant applications are solicited through a grants notice or request for proposal.

Employees considering applying for a competitive grant should first contact the Chief Financial Officer for guidance. The Chief Financial Officer and the Superintendent will review the application as a first screening to determine the appropriateness of the grant.

- Appropriate district and school personnel will be consulted prior to approval.
- The applicant will be informed of the position of the district office regarding the application of the grant.
- The superintendent will provide approval before employee(s) proceed with grant application. Only the superintendent may sign contracts.

The district shall comply with all local, state, and federal rules and regulations concerning these grant programs, and all grants applied for shall comply with board of education (board) policy, district, administrative rules and district procedures.

The Superintendent and/or Board shall approve any grant that:

1. Requires a special appropriation from the general fund prior to the acceptance of the grant's funding; or
2. Specifically requires Board approval.

In subsequent years:

1. These funds shall be disclosed in the District's annual budget.
2. The continuing acquisition of these funds shall be based on board approval of the annual budget.

Matching Funds

Grants requiring matching funds are not preferred, but exceptions may occur. Any grant application which requires "Matching Funds" and not currently budgeted must be presented to Chief Financial Officer and Superintendent for review and approval. It will be the determination of the Superintendent to send the "request for matching funds" to the board, along with appropriate documentation, to request the additional funds needed for the final grant approval. This final decision will be made only AFTER a pre-award has been granted by the grantor.

The Superintendent or his/her designee shall be authorized to submit grant applications for federal programs approved by the Board and to establish and maintain a system for administering federal funds awarded to the District. The Superintendent or his/her designee shall develop procedures to ensure that the following requirements are met:

1. The financial management system establishes control over, and accountability for, all funds, property, and other assets acquired through federal funds. Safeguards are in place to assure that all assets are used solely for authorized purposes.
2. All program expenditures, including travel costs, are reviewed to ensure that federal funds are expended only for allowable activities and in accordance with applicable cost principles.
3. Procurement activities are conducted in compliance with federal procurement standards, including written standards covering conflict of interest for employees engaged in the selection, award, and administration of contracts supported by federal funds. No employee, officer, or agent of the District may participate in the selection, award, or administration of a contract supported by federal funds if he or she has a real or apparent conflict of interest.
4. Internal controls over federal funds awarded to the District are established and maintained in compliance with state and federal laws, regulations, and the terms and conditions of the federal award. (DFC Policy)

SECTION 5: STUDENT ACTIVITY FUNDS MANAGEMENT

School Funds

Principals are charged with the prudent management of school funds generated within the school or from sources other than federal, state, and local public funds. To this end the principal of each school in the Wayne County School System shall submit to the office of the Superintendent a monthly financial report immediately upon the end of each month of the fiscal year. Said report shall contain and account of all receipts and expenditures of funds within the school during the past month. The Wayne County Board of Education and the Superintendent reserve the right at any time to inspect all books, records, and accounts, and each principal shall keep such books, records, and accounts in good auditable order at all times.

The financial records of each school shall be subject to an annual internal audit by the Wayne County Board of Education central office personnel as of June 30. At the request of the Superintendent or the Board of Education, an external audit may be conducted. In that instance, however, the cost of the external audit shall be paid from the account being audited. Copies of audits shall be maintained in the Superintendent's and principals' offices in accordance with the Wayne County School System's Records Retention Schedule.

School financial records should be maintained on a computer system. Records shall be kept in accordance with generally accepted accounting practices and with rules issued by the Georgia Department of Education so that a clear audit trail is readily discernible from the receipt of funds through disbursement. Such practices shall include, but are not limited to, the following:

1. All supporting financial records, including receipts, checks, bank statements, bills and vouchers, daily activities sheets, individual accounts, and ledgers (as applicable) will be retained in accordance with the Wayne County School System's Records Retention Schedule.
2. The school secretary will record all expenditures and receipts daily. Each activity within the school will have its own separate account. All daily activities should be recorded in each individual account. All School Activity Reports should balance at all times and must be reconciled with the bank statement each month.
3. Monies collected by school employees and by student treasurers shall be handled with good and prudent business procedures. All monies collected shall be receipted, accounted for, and directed without delay to the proper location of deposit. Persons responsible for individual accounts within the school shall be instructed to maintain copies of all receipts (both those issued by the teacher or club and those received when activity funds are deposited with the school secretary) in good order so that they may be retrieved and balanced against accounting records at any time.
4. In no case shall monies be left overnight in schools, except in safes provided for safekeeping of valuables, and even then the amount shall not exceed more than a few dollars. All schools shall provide for making bank deposits after regular banking hours in order to avoid leaving money in schools overnight.

5. All monies handled by teachers and/or students in connection with school activities are required by law to be accounted for by the principal. All such monies collected must be turned in to the assigned office. A receipt must be issued for any money collected and must state for what purpose the money was collected.
6. Principals shall maintain a file by school year of all contracts made for or on behalf of students. All receipts and disbursements resulting from activities specified within those contracts shall be handled in accordance with the regulations and procedures in this policy.
7. All receipts and expenditures should be in compliance with regulations detailed in the Wayne County Board of Education Bookkeeper Handbook. (DK Policy)

School Funds--Best Practices and Prohibitions

Signing blank checks in advance is not permissible.

All vouchers must contain an invoice number. Early payment discounts should be taken when offered. The school system is sales tax exempt. No sales tax should be paid on any purchases.

Before issuing a check, the school bookkeeper should make sure all supporting documentation is in order. Evidence supporting expenditures should be in the form of itemized receipts, invoices, or sales slips. **Purchase Order or Purchase Approval and Reimbursement Form** should be attached. If a PO was completed, then Receiving Report should be attached as documentation that the items were received. All of these documents should be put together to form a check package. These packages should be filed numerically by check number in a separate folder for each month.

PAYMENTS SHOULD NEVER BE MADE FROM A STATEMENT. A statement will not be accepted as adequate documentation. Adequate documentation will leave no doubt to an examiner as to WHAT and WHY an item or service was purchased. When all required supporting documentation is made available, the bookkeeper should prepare the check for the principal's signature. The principal shall sign the check only after he/she has reviewed and approved the supporting documentation.

Checks payable to the school principal should not be signed by the principal. The second authorized signature for the school's checking account should sign the check only after reviewing appropriate supporting documentation.

Vendor statements are reconciled as they are received by the school. The charges and payments on the statement should be looked up on the financial software system and checked off of the

statement. Any discrepancies should be followed up immediately with the vendor. This file should be maintained at the school for five years. Each bookkeeper will be provided a copy of the Bookkeeper Handbook.

SECTION 6: FEDERAL PROGRAMS GUIDELINES

RAMP

The Resource Allocation Methodology/Plan (RAMP) is locally developed and demonstrates equitable allocation of State and Local funds to operate all the schools in the district. No federal funds are included in these calculations. The RAMP is used to ensure that non-federal funds are distributed equitably across the district so that federal funds have the opportunity to make a difference. The Wayne County School System RAMP is based on “per pupil expenditure.” The Federal Programs Director and Chief Financial Officer review the RAMP and all budgets annually to ensure that RAMP is followed.

Budget Approval Process-Federal and State Grants

- Award letters for federal programs are sent to Program Director.
- Schools are given the allocated dollar amount for budgeting after required set-asides are deducted from the total.
- Approval of the school improvement plan will be documented using the Schoolwide Program Checklist and the School Improvement Plan Feedback Form.
- After approval, guidelines will be provided on federal programs expenditures (Title I Allowable and Non-Allowable Cost Reference Guide—Examples) and the School Site Budget Form will be used to project line item budget amounts.
- The School Site Budget Form will be sent to the Federal Programs Director for review and approval.
- Logic models (if appropriate) will be completed and maintained in a file in the office of the Director of Federal Programs.
- Federal budgets (for district and schools) are entered into the GaDOE Consolidated Application (electronic grant application process) by the Federal Programs Director or authorized staff.
- The budgets are submitted through the Consolidated Application by the Program Director.

- Individual budgets are approved by the superintendent (budget may be rejected at this level and requests for revisions may be made).
- Budgets are approved by program specialists at the GaDOE (budgets may be rejected at this level and requests for revisions may be made).
- Budget amounts are approved by GaDOE Accounting.
- Budgets are then adopted by the Wayne County BOE. Budget amendments are presented to the BOE as part of the monthly financial report. Once budgets are approved by GaDOE and adopted by the Wayne County BOE, the budget will then be entered into the FINANCIAL SOFTWARE SYSTEM accounting program within 30 days by the Program Secretary.

Reservation of Funds-Title I

- *Homeless Children and Youth:* Title I schools are required to set aside funds within their budgets to meet the needs of homeless children and youth. The Federal Programs Director, along with the Homeless Liaison, determine annually the amount of funds needed to adequately meet the needs of homeless students. The Homeless Liaison trains school personnel including counselors, Parent Involvement Coordinator, as well as clerks, teachers, and principals to identify children in homeless situations. A home survey is also used to identify homeless students. The Homeless Liaison is consulted if any staff member suspects that a student qualifies for homeless services. The Federal Programs Director then investigates the situation and makes the ultimate determination on whether or not students qualify. When a student does qualify, notes are maintained related to the situation, and a memo is sent to the Student Information Coordinator and the Director of Food and Nutrition. Homeless set aside funds are used to purchase needed supplies and for tutoring services for identified homeless students on an “as needed” basis.
- *Neglected and Delinquent Children:* The reservation amount provided by GaDOE in the Title I, Part A allocation letter and worksheet is the amount set aside for neglected and delinquent children.
- *Private Schools:* Wayne County Schools currently has no private schools that have chosen to participate in the Title I program. If Wayne County Schools have any private schools that choose to participate, all Title I regulations for private school participation will be followed. The private school worksheet would be completed and attached to

the Consolidated Application to ensure that all reservations related to parental involvement, instructional lead teachers, professional learning, and paraprofessionals have been reserved.

- The district uses the information provided by the GaDOE to determine reservations for parental involvement, district initiatives, and indirect cost.

ESSA

Directors and principals have been provided ESSA guidance. Websites, such as <https://ies.ed.gov/ncee/wwc/> and <https://www.evidenceforessa.org/> are used to review various interventions. Interventions supported with federal funds will be evidence-based. If the intervention does not have a strong, moderate, or promising base, the “Wayne County School System Logic Model” template will be completed. All logic models will be kept on file in the office of the Federal Programs Director.

Procedures for Determining Allocations--Title I, Part A

After receiving notification of the Title I, Part A grant amounts from GaDOE, reservations in each budget are set aside for required components such as parent involvement, professional learning, neglected and delinquent, private school per pupil & equitable services, and homeless students. Administrative costs are also part of the reservations, which are not part of the school’s per pupil amounts. Typically, a request for lesser amount is submitted for professional learning for Professionally Qualified teachers, since Title IIA funds are sufficient to meet the districts’ needs.

Attendance area determinations are calculated using the previous year’s October FTE count of children eligible for free/reduced price meals under the School Lunch Act and the October FTE enrollment report. These numbers are placed in the attendance area determination worksheet provided by the GaDOE and are then ranked from highest to lowest percentage of free/reduced lunches. Pre-K counts are not included in the document. Any of the WCSS schools that are over 75% poverty earn the highest per pupil allocations. The per pupil allocation is always large enough to provide a reasonable assurance that each school can operate its Title I program of sufficient quality.

Comparability-Title I

All schools within the Wayne County School System are Schoolwide Title I Schools. Comparability is calculated yearly by the Federal Programs Director and GaDOE within the GaDOE portal based on FTE

and CPI data. For comparability purposes, the WCSS does group elementary schools by large and small schools based on federally approved procedures.

Maintenance of Effort

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

Procedures for Determining Carryover--Title I

The Director of Federal Programs tracks the spending of each program/school through the year via budget sheets. At the end of the school year, carryover information is updated and reviewed. Typically, carryover funds are allocated in one of two ways: (1) to schools by increasing the per pupil amount maintaining rank order, basing that amount on the total number of children from low-income families in each area or (2) the funds are allocated back to all the schools on an equal basis, giving each school an opportunity to spend the funds. Either way, schools must submit a written description of the expenditure requests.

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

Suspension and Debarment

Federal requirements indicate that non-federal entities are prohibited from contracting with parties that are suspended or debarred, or whose principal agents are suspended or debarred. Covered transactions include any individual contract for goods or services that equal or exceed \$25,000. The Wayne County School District utilizes the System for Award Management at www.sam.gov to search vendors to verify that they are not suspended or debarred. The System for Award Management (SAM) is a federal government owned and operated free website.

If the total expended exceeds \$25,000 on an individual contract, the grant recipient will conduct a search using SAM and maintain time-stamped documentation of said search. No purchase can be made if the SAM report indicates that the vendor has an “Active Exclusion.”

At the end of each fiscal year, the Chief Financial Officer will run a Vendor History Report for all vendors who have been paid out of federal funds. This report will be used to verify vendors for the upcoming fiscal year. The Federal Programs Secretary will generate a list of all approved vendors and will distribute this list to all Federal Programs Coordinators and their secretaries. When a purchase requisition being charged to federal funds is received by the Federal Programs Coordinators and/or their secretaries, the list of approved vendors is checked. If the vendor is on the approved list, the purchase requisition is processed. If the vendor is NOT on the approved list, the Federal Program Director’s secretary is contacted to do a vendor search to see if the vendor is approved. If the vendor is approved, their name is added to the list and distributed to the appropriate personnel. If the vendor is not on the approved list, the purchase requisition is not processed until the vendor either meets the requirements or another vendor is selected. Vendor history reports are printed quarterly to ensure that no purchase orders have been issued to unapproved vendors.

To search for vendor records:

1. Go to www.sam.gov
2. Click the “Search Records” button
3. You do not need a username or password
4. Enter Name of Business, CAGE Code or DUNS number.
5. Click the “Search” button
6. Any information that matches criteria will be returned
7. If multiple results are returned with the same name, verify the address to determine that correct vendor has been returned. The address can be viewed by clicking on the “+” next to the “status”
8. If the indicator box is “green” and states “Entity”, this vendor is not suspended or debarred. This vendor is cleared for purchases.
9. When you are ready to search for the next vendor, click on the “clear search” button.
10. If the indicator box is “purple” and states “Exclusion”, this vendor is suspended or debarred. This vendor is NOT cleared for purchases.

Documentation from SAM.gov should include:

1. The name keyed in the Search field
2. The date should print on the top or bottom of the page automatically
3. The name of the person doing the search
4. The result of the search

Documentation will be maintained in the office of the Federal Programs Director.

Reasonable and Necessary Use of Funds

Expenditure of federal funds must meet the clause of “reasonable and necessary.” When considering a purchase with federal funds, the following items must be considered:

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

Allowable Costs-EDGAR

Wayne County Schools will enforce appropriate procedures and penalties for program, compliance, and accounting staff that are responsible for the allocation of federal grant costs based on their allowability and their conformity with federal cost principles.

Definitions

Allowable cost - A cost that complies with all legal requirements that apply to a particular federal education program including statutes, regulations, guidance, and application for funds.

Education Department General Administrative Regulations (EDGAR) - A compilation of regulations that apply to federal education programs. These regulations contain important rules governing the administration of federal education programs, and include rules affecting the allowable use of federal funds (including rules regarding permissible costs, the period of availability of federal awards, documentation requirements, and grants management requirements). EDGAR is accessible at: <http://www2.ed.gov/policy/fund/reg/edgarReg/edgar.html>

EDGAR requires all grantees and sub grantees to follow the cost principles.

Determining Allowable Costs

Federal grant programs are governed by a variety of federal rules including statutes, regulations, and non-regulatory guidance. To determine whether a cost may be paid with federal funds, i.e. whether the cost is permissible, staff must be familiar with these rules and how they work together.

Generally, when analyzing whether a particular cost is permissible, it is useful to perform the following analysis:

1. Is the cost forbidden by federal laws such as EDGAR?
2. Is the cost permissible under the relevant federal program?
3. Is the cost consistent with the federal cost principles in EDGAR?
4. Is the cost consistent with the program specific fiscal rules?
5. Is the cost consistent with an approved program plan and budget, as well as any special conditions imposed on the grant?
6. Does the cost adhere to the period of performance?
7. Does the cost avoid any conflict of interest?
8. Does the cost align with the program purpose and the School Improvement or District Improvement Plan?
9. Does the cost supplement and not supplant the purpose of the LEA?

While there are other important considerations that school system staff must take into account when analyzing whether a specific proposed cost is permissible, the above questions can be useful in determining permissibility.

Unallowable Costs-EDGAR

EDGAR identifies certain costs that are unallowable to be paid with federal funds. The following list provides examples of such costs. If a cost is on this list, it may not be supported with federal funds. The fact that a cost is not on this list does not mean it is necessarily permissible.

Costs that are Unallowable under EDGAR

- Advertising and public relations costs (with limited exceptions); this prohibition includes promotional items and memorabilia, including models, gifts, and souvenirs
- Alcoholic beverages
- Bad debts

- Contingency provisions (with limited exceptions)
- Donations and contributions
- Entertainment costs
- Fines and penalties (with limited exceptions)
- Fundraising and investment management costs (with limited exceptions)
- General government expenses (with limited exceptions pertaining to Indian tribal governments and Councils of Governments)
- Goods or services for personal use
- Lobbying
- Selling and marketing costs (with limited exceptions)

Costs that are Unallowable under EDGAR (Part 76)

- The use of funds for religion
- The acquisition of real property (unless specifically permitted by programmatic statute or regulations) which is every rare in federal education programs
- The use of funds for construction (unless specifically permitted by programmatic statute or regulations) which is very rare in federal education programs
- Charging tuition or fees collected from students toward meeting matching, cost sharing, or maintenance of effort requirements of a program

Program Allowability

2 CFR, Part 200.420-200.475 requires that any cost paid with federal education funds must be permissible under the federal program that would support the cost. Many federal education programs detail specific required and/or allowable uses of funds for that program. Issues, such as eligibility, program beneficiaries, caps or restrictions on certain types of program expenses, and other program specific requirements must be considered when performing the programmatic analysis. Some federal programs do not contain a “use of funds” section delineating the allowable uses of funds under those programs.

Federal Cost Principles

EDGAR defines the parameters for the permissible uses of federal funds. While there are many requirements contained in EDGAR, it includes five core principles that serve as an important guide for effective grants management. These core principles require all costs to be:

- **Necessary** for the proper and efficient performance or administration of the applicable program
- **Reasonable** expenditure(s) in terms of amount used, needs of the program, and requirements of the program
- **Allocable** to the federal program that paid for the cost(s). The program must benefit in proportion to the amount charged to that program.
- Records and methods used to determine the allocation should be kept and made readily available for federal, state, and/or local reviews.
- **Authorized** under state and local rules. All actions carried out with federal funds must be authorized and not prohibited by state and local laws and policies. When in doubt, it is best to act according to the most restrictive rules.
- **Adequate Documentation** is a must. Proper documentation provides evidence to monitors, auditors, or other oversight entities of how the funds were spent during the period of availability.

EDGAR also contains specific rules on selected items of costs. Costs must comply with these rules in order to be paid with federal funds.

Supplement, Not Supplant for Federal Requirement

Federal fund expenditures are supplemental to schools' budgets. Personnel funded whole or in part by federal funds are in addition to the number of personnel required to meet maximum class size as determined by GaDOE. Federal funds are only used to supplement and, to the extent practical, increase the level of funds that would, in the absence of federal funds, be made available from non-federal sources for the education of students participating in federal fund programs. Federal funds are not used to take the place of (supplant) local, state, or other federal funding.

Federally Funded Personnel

Periodic Certification - Periodic certification for all federal fund staff takes place after the fact. The process takes place twice yearly, in early January and at the end of May (post-planning). The forms are signed and kept on file in the office of the Program Director. The purpose of this artifact is to verify that personnel who are paid from federal funds have performed job responsibilities in compliance with federal fund guidelines. Employees who are fully funded by federal programs and who work on a single cost objective should complete a Periodic Certification.

Paraprofessionals paid with federal funds must work in an area associated with one of the four main core content areas and be assigned to a professionally qualified teacher. Class size reduction teachers, as well as supplemental teachers, must also work in the main core content areas. Instructional coaches may NOT have any “administrative” duties or responsibilities, but may have “other duties as assigned” consistent with other non-administrative school personnel, such as teachers.

Split-Funded Personnel - Split-funded personnel with different cost objectives are required to maintain time logs (Personnel Activity Report). Certain job classifications associated with federal funding may also have requirements of maintaining a Personal Activity Report or a log for accountability purposes. Personal Activity Reports/logs required by federal programs or by job designation must be turned in to the Federal Programs Director at the end of each month for review. Employees who work on multiple cost objectives are required to complete a PAR. If there is a need for adjustments to the PAR, such adjustments must be completed by the end of the year so that the final amount charged to the Federal award is accurate, allowable, and properly allocated. The logs are kept on file in the Federal Program Director’s office for three years.

SECTION 7: INVENTORY

Inventory management procedures begin with determining the need and use of equipment to fulfill the action steps of the school improvement plan. All equipment purchased with Title funds should be necessary, reasonable, allocable, and allowable. Once purchased, the equipment must continue to be used for that or a related purpose. The Federal Programs Director is responsible for disseminating the inventory procedures and allowable uses of equipment to District Directors and Principals. The Principals are responsible for disseminating inventory procedures and the allowable uses of equipment with the school staff. Sign-in sheets with agenda or minutes will be collected and maintained in the Federal Programs office of these meetings.

Once grants are awarded to the district each year, FAIN numbers for all federal programs are sent to the technology specialist who oversees the entry of federal programs equipment into the inventory software, Follett. The following fields are completed in the inventory software by the technology specialist who serves the district office and each school within a two-week period of receipt of the purchase:

- A serial number, model number, or other identification number
- funding source, including the FAIN, and percentage under which the equipment was acquired
- The source of property (vendor)
- The acquisition date and unit cost
- The present location of the equipment
- The use of the equipment
- The condition of the equipment (Good, Fair, or Poor)
- The date of the information reported on the inventory

Equipment purchased with federal funds is marked with a barcode label. Any equipment, material, and/or supplies purchased with federal funds is considered solely for the use of that program.

Inventory of all equipment and property belonging to any federal program will be identified and inventoried yearly by the technology specialist. The school-building level administrator will verify an inventory of items purchased with Title funds each December, and the technology specialist and Federal Programs Director will randomly spot-check equipment each spring. During both checks, Title inventory sheets will be printed, signed, and dated by the technology specialist and copies of inventory checks will be maintained at the school level and in the office of the Federal Programs Director.

Check-in and check-out of Title I inventory is handled by the Media Specialist, with the assistance of the technology specialist, using Follett software. The staff person's name checking out the equipment is indicated in the inventory management system.

It is the goal of the Wayne County School System to consider replacement of equipment on a 5-year rotation basis if funding is available. In the event that equipment is no longer usable, materials and equipment will be disposed of following Wayne County School System's disposal procedures. If an item is still usable but no longer serves the needs of a particular federal program, the following procedures will apply:

- If other Title I, Title II, or Title III school programs within the district can utilize the inventory, the item(s) will be transferred to the applicable inventory list.

- If other federal programs do not acquire the inventory, non-federal programs will have access to the inventory. If accepted, the inventory will be transferred to the applicable inventory list.

Equipment that is damaged, lost, or stolen will be reported to the Federal Programs Director. The Federal Programs Director will work with the principal (if occurring) at a school to conduct any investigation that may be necessary to obtain information. Lost equipment will be verified by the principal and noted in the inventory. Damaged and inoperable equipment will be returned to each school's Media Center to be removed from inventory. Any damage due to negligence or malicious intent will be dealt with appropriately (as determined by Personnel and/or Student handbooks). A police report will be required for stolen property. Disposed items must remain on inventory for a period of three years.

Supplies purchased with federal monies are not required to be a part of the inventory management system, but should be labeled and separated in a location deemed appropriate and accessible.

Lease of Equipment

The school system does not lease equipment using federal funds.

Use of Equipment in Targeted Assistance Schools

The school system does not have any targeted assistance schools at this time. If and when applicable, the Wayne County School System will follow all federal and state guidelines.

Use of Equipment in Private Schools

The school system does not have any participating private schools under Title I. If and when applicable, the Wayne County School System will follow all federal and state guidelines.

Site Visits

Random site visits may occur throughout the school year. For formalized monitoring, at least one site visit will take place each year by the Federal Programs Director. During the formalized site visit, the principal, along with any individuals working with the Title I budget and/or Title initiatives, will meet with the Federal Programs Director to review procedures and pertinent information. During the site visit, the Federal Programs Director will work with principals to correct any findings and answer any questions.

Offsite Use of Equipment

The Wayne County School System allows staff to take equipment offsite as appropriate for school related use after approval is given by the Federal Programs Director or designee. An email is adequate to obtain prior approval; serial number and description of equipment, as well as purpose of off-campus use and the number of days requested for off-site use, should be provided in the email. The principal and technology specialist at the designated school should also be included on the email so that the technology specialist can ensure that the equipment is returned within the timeframe provided. After written approval is given, the equipment taken offsite becomes the responsibility of the staff member. The staff member is responsible for protecting the integrity of the equipment and becomes personally responsible for returning the equipment.

Equipment Disposition Procedures

When computer equipment is no longer operational, it will be disposed of or recycled. Schools are given the opportunity each summer to dispose of technology that is out of date or no longer operational. Inventory records will need to be corrected, printed, and maintained by technology specialist assigned to the school. At the designated time, the outdated technology is brought to a predetermined location to be recycled. The Technology Department works with a company to dispose of and recycle all equipment. At that time, the company determines whatever is most appropriate for the equipment. The company is required to present the school district with a certificate stating that all data has been removed from all technology devices. Currently, the school system does not receive any money for the recycling or disposal of equipment.

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

1. File an incident report with the police department.
2. Send a copy of the incident report to the Federal Programs Director's office.
3. Make appropriate revisions to the Title I inventory.

The principal must sign and date the revised inventory spreadsheet and maintain a copy. A copy of the revised inventory is sent to the Federal Programs office.

Personal and Real Property

Any single item of school property valued in excess of \$5,000.00 (five thousand dollars), personal or real, including, but not limited to, land, buildings, equipment or motorized vehicles, shall be declared

surplus after approval by the Wayne County Board of Education ("Board"). Any single item of school property valued as surplus at less than \$5,000 (five thousand dollars) does not require Board approval to be declared surplus. School property shall be submitted to the Board for its approval as surplus when it is not needed for school purposes, when it is obsolete, or when the cost of maintenance is excessive. Surplus property may be land, buildings, equipment, or materials.

SECTION 8: MONITORING OF FEDERAL PROGRAMS

Federal Programs Overview

The purpose of federal education program funding under the Every Student Succeeds Act (ESSA) is to provide LEAs and their schools with supplemental financial resources and assistance to ensure all children have access to a fair, equitable, and high-quality education, and to potentially close the educational gaps that exist among Georgia's children. Federal program guidelines ensure that the same content and performance standards and expectations for success are held for all students. Federal program funds in Georgia supplement and support the programs and strategies that help all students thrive through existing LEA flexibility structures and systems.

Federal Programs Monitoring

Federal programs are monitored by the state to determine the effectiveness of the entire program as well as individual student progress. It is mandated that instruction be individualized; therefore, diagnostic information must be obtained to plan each student's program. The Georgia Department of Education requires that Wayne County Schools monitor the implementation of federal programs and the expenditure of all funds associated with the program. The specific requirements are as follows:

- A. Federal Programs Director will conduct self-monitoring of its schools and programs sufficient to ensure compliance with Title Program requirements, including Title I-Part A, Title I-Part C, Title II-Part A, Title III-Part A, Title IV-Part A, and McKinney-Vento Act.
- B. Federal Programs Director will undergo training from GaDOE and other sources to maintain proficiency in federal program compliance requirements.
- C. Federal Programs Director will provide guidance to District Directors, who will share the responsibility for providing technical assistance to local schools.

- D. Federal Programs Director will monitor all program expenditures to verify that all program expenditures comply with federal program requirements.
- E. Federal Programs Director will maintain all documentation LEA may need for future auditing/monitoring according to the LEA Monitoring Form, which is issued annually by GaDOE.
- F. In years when LEA does not receive an on-site visit, Federal Programs Director will complete the Self-Assessment Checklist and submit to the Georgia Department of Education (GaDOE).
- G. LEA will undergo monitoring by GaDOE on a three- to four-year cycle. Federal Programs Director will participate in training and technical assistance updates as provided by GaDOE prior to monitoring visit.
- H. After the on-site monitoring visit, the LEA will receive a comprehensive monitoring report, which will contain recommendations, findings, and required actions that together provide an analysis of the implementation of the LEA's federal programs. If a Corrective Action Plan is required, the Federal Programs Director will respond in a timely manner with a Corrective Action Plan, which must be approved by GaDOE. The appropriate Federal Program Education Program Specialist will monitor implementation of the Corrective Action Plan.

Monitoring is an essential component of ensuring that all facets of the federal programs are being implemented as prescribed. It is a process of systematically providing technical assistance and collecting data in order to provide information that can guide program implementation.

Wayne County Schools' Federal Program Director ensures that monitoring includes regular observation and recording of activities taking place in all Title schools. Critical to this process is the feedback provided to schools that can assist in improving student academic achievement. District monitoring addresses the following:

- Ensuring that all federal program activities are carried out in accordance with federal compliance guidelines
- Monitoring inventory and equipment usage
- Attaining specified academic achievement goals
- Complying with budgetary guidelines

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

1. *Program Requirements*- LEAs must submit for approval the Consolidated LEA Improvement Plan (CLIP) through the consolidated application process. Federal Program Specialists review each CLIP to ensure that the plan contains allowable activities for use and budgeting of federal monies. If the CLIP plan requires revisions, those revisions will be discussed with the Superintendent and other personnel who may have input. The revision will be completed by the Federal Programs Director and resubmitted. Once the CLIP has been approved, the LEA submits a budget reflecting the approved CLIP activities for review and approval by the Federal Programs staff assigned to the LEA. The LEA updates its CLIP under ESSA, as needed, to reflect changes, and it submits the updated CLIP to the SEA for review and approval. Updates to the CLIP are typically performed on an annual basis in Georgia.
2. *Monitoring of Expenditures* – Local educational agencies (LEAs) must submit for approval an annual budget through the Consolidated Application process. The Federal Programs Director assists in developing the district plan and reviews each school plan to ensure that budget items align to district and school initiatives as stated in the plans. The federal program director ensures expenditures are appropriate for the program area before approving LEA budgets. Once budgets are approved, the Federal Programs Director tracks the request of funds for expenditures to ensure that LEAs are meeting the implementation guidelines for federal programs funds.
3. *Single Audit* – LEAs with single audit findings are flagged for technical assistance.
4. *On-Site Monitoring* – An SEA on-site cross-functional monitoring team visits an LEA to apply the criteria included in the *LEA Monitoring Rubric*.
5. *Self-Monitoring Checklist* – LEAs not receiving an on-site visit complete the Self-Assessment Checklist and submit it to the Georgia Department of Education (GaDOE).
6. *Physical Inventory Monitoring* - An on-site physical inventory monitoring visit by the federal programs director will occur at least one school per year. A random check of physical inventory in the school with a FAIN number will be checked for location and use. Technology specialists, who are assigned to all schools in the district, will be responsible for recording, maintaining, and printing the physical inventory two times a year (December and May). After the inventory check in December and May, the inventory sheet (with all pertinent descriptive information) will be signed and dated by the technology specialist to indicate confirmation that the inventory sheet is correct. The signed and dated inventory sheet for each school will be maintained in the principal's office and a copy sent to the office of Federal Programs.

SECTION 9: COMPREHENSIVE LEA IMPROVEMENT PLAN (CLIP)

CLIP revisions take place annually using prior year data and needs assessment information. The CLIP serves as the plan detailing coordination of various federal programs, identification of needs, and budgeting for such needs with federal funds. System level data is compiled, reviewed, and discussed at Directors' meetings and with internal and external stakeholder groups. Internal stakeholders include principals, assistant principals, instructional coaches, teachers, and classified personnel. District SMART goals are determined based on current data and action steps are written to determine high priority initiatives to meet the SMART goals. Directors collaborate and meet in small groups to finalize implementation plans for the action steps.

In the spring of the year and as the district plan is being finalized, the development of school improvement plans begin. The school leaders align and/or support the SMART goals of the Wayne County School System district plan. School leadership teams begin the same process: review and analyze data, determine overarching needs, and consider root causes as action steps are drafted. Once school staffs return in July, action steps are defined in more detail and finalized by external stakeholders. Budgeting, timeline, monitoring procedures, and persons responsible are established for the district and school improvement plans. School leaders engage stakeholder groups in the process through School Councils and Parent-Teacher meetings.

District and school leadership teams solicit input from stakeholders. External stakeholder meetings are convened and documented as final plans for the CLIP are reviewed. The district conducts an annual survey each year that allows parents to provide input on district policies and procedures. Parent input is examined and considered from these surveys. Documentation includes sign-in sheets, agendas, meeting minutes, emails, and returned plans with comments. Copies of comments are kept on file and put in meeting minutes. Several subsequent meetings are arranged to garner input from all stakeholders. For example, input is solicited from district, school, and curriculum leaders at monthly Principal/Director meetings. The Federal Programs Director is responsible for facilitating the work around the CLIP and the final submission. The plan is submitted to Superintendent for final approval before submission into SLDS. For required revisions, appropriate personnel are consulted and plan is resubmitted within five working days.

LEA Monitoring of School Programs

The Georgia Department of Education requires that Wayne County Schools monitor the implementation of federal programs and the expenditure of all funds associated with the program. Monitoring of Title schools is a critical component of ensuring compliance. During the summer prior to the beginning of the new school year and after the Federal Programs Conference, the Federal Programs Director (or designee) convenes a meeting of all principals and district directors to review policies and procedures. General guidance is also given on the required alignment between school improvement plans and Title purchases. Phone calls and emails are common and are maintained as documentation of technical assistance. District directors (mentors) work with principals from the spring of the year through the beginning of school to develop school improvement plans that align to the district plan and based on a process (with a timeline) that extends over three months. District directors (mentors) work with the principals on the following: data collection for the comprehensive needs assessment (surveys, assessments, MTSS data, etc.), determining overarching needs, developing SMART goals, and development of action steps. The GADOE Schoolwide Program Checklist is used to ensure that all required components are addressed. The School Improvement Plan Feedback Form is used to monitor the school improvement processes, with much emphasis on the structure of the school leadership team.

Professional learning on school improvement processes is provided to principals, assistant principals, and instructional coaches through regularly scheduled principals' meetings and the Administrator Retreat that is scheduled during pre-planning.

In addition to meeting with principals, the Federal Programs Director (or designee) meets with the Parent Involvement Coordinator at the beginning of each year. Any changes to Title I and/or the parent engagement policies and procedures are discussed as well as Title I parent engagement budget per district and per school. All Title services are supplemental. Monitoring is conducted through on-going technical assistance, site visits, and management of the budgeting process.

Onsite Monitoring Procedures

All federal programs are subject to on-going monitoring by the Federal Programs Director and district mentors throughout the school year. The Federal Programs Director and district mentors will conduct on-site monitoring of all schools at least once per month to ensure compliance with federal

programs guidelines and implementation of school improvement plans. Feedback will be provided to the principals via checklists and descriptive information.

The Federal Programs Director, along with district mentors and school principals, will self-monitor and adhere to the timeline provided below.

<p style="text-align: center;">WAYNE COUNTY SCHOOL DISTRICT Annual District/School Improvement Plan Timeline Federal Programs Timeline 2018-2019</p>		
Important Dates	District and School Improvement	Federal Programs Guidance/Activities
March 2018 – May 2018	<ul style="list-style-type: none"> ● Conduct school improvement planning meetings with Leadership/SIP Team to review data and conduct an after action review from the previous SIP school year ● Revise SIPs/Develop a minimum of two SMART goals for the upcoming school year that align to district goals 	<ul style="list-style-type: none"> ● Review with principals updated/revised rules and regulations pertaining to school improvement plan (ESSA) ● Submit CLIP (DIP, Equity Plan, Foster Care Template, District Parent Engagement Policy, and ID&R)
June – July 2018	<ul style="list-style-type: none"> ● Develop action steps for the SMART goals ● Draft of SIP provided to directors; directors provide feedback ● Engage internal/external stakeholders group to review plan (by July 27, 2018); maintain meeting minutes and sign-in sheet ● Secure translator service list for 2018-2019 school year 	<ul style="list-style-type: none"> ● Assist schools with planning and preparing Title 1 Parent Packet for dissemination and on display: (parent compact, parent and family engagement plans [school level and district level], information on locating school improvement plans, parents right to know letters, school/district status letters, homeless survey) ● Federal Programs Personnel attend Federal Programs Conference ● Complete Migrant Program Evaluations and post-data on

		Migrant Implementation Plans
August 2018	<ul style="list-style-type: none"> ● Determine budget needs to support action steps ● Determine Professional Learning (PL) training needs (by August 6, 2018) ● Complete Logic Models, if appropriate ● Conduct SIP overview with faculty/staff during pre-planning ● Conduct SIP overview with parents at the school Open House and School Council ● Guidance documents are drafted for school improvement plan for first half of year ● Final SIP is submitted with timelines, persons responsible, and method for monitoring by August 6, 2018 ● Communicate school improvement plan to all stakeholders (staff and community) by August 16, 2018 ● School leadership team meeting dates are submitted to District Mentor 	<ul style="list-style-type: none"> ● Federal Programs Regional Meetings ● Title III Update with ESOL teachers; ESOL teachers review Home Language Surveys and screen students for language other than English ● Federal Programs Training for Administrators ● Title I, C meeting with MSSP's (review CER and finalize implementation plans) ● Migrant Fall PAC Meeting (August 15, 2018) ● Title I, C Migrant Regional Trainings ● Title I, A Update with Parent Engagement Coordinator ● Federal Programs System Annual Meeting for Stakeholders (including Parent and Family Engagement) ● Annual Title I meetings ● District Parent and Family Engagement Plans (English and Spanish) disseminated to parents and posted on websites
September 2018	<ul style="list-style-type: none"> ● Prepare budget for SIP ● Begin implementation of action steps of the SIP ● Collect STAR pre-assessment data 	<ul style="list-style-type: none"> ● Sign-off on federal programs budgets ● Annual Title I meetings continued ● Training for school volunteers conducted by the end of the month ● Federal Programs documents due from Principals; Principal attestations ● Schedules and signed job descriptions for federally funded personnel completed

		<ul style="list-style-type: none"> • Annual Title I meetings completed (guidance provided from district parent engagement) • School Improvement Plans (posted on websites) • Curriculum Night or 1st Set of APTT meetings completed • PD for staff on building capacity for non APTT schools (provided by district) #1 • Updated Remediation Plan for non-PQ personnel • Regional Training for Monitoring • Title I Budget Preparation/Submission and TA to Principal • Private School Participation Planning Meeting or letters go out for State Consultation meetings
October 2018	<ul style="list-style-type: none"> • Complete ABC Data Review sheet for September • Continue with implementation of action steps 	<ul style="list-style-type: none"> • Send private school letters • Title III GaTESOL Conference • FTE reporting • FELT meeting • Calculate Comparability (if necessary)
November 2018	<ul style="list-style-type: none"> • Complete ABC Data Review sheet for October and for 1st 9 weeks • Continue with implementation of action steps • Logic models are completed and implementation has begun for school improvement plan for first half of year 	<ul style="list-style-type: none"> • Federal Programs TA for Administrators • Conduct or participate in (state) private school meeting • 1st Set of APTT meetings data upload due to GADOE November 9th; 2nd set of meetings begin
December 2018	<ul style="list-style-type: none"> • Complete ABC Data Review sheet for November • Collect and review STAR interim data 	<ul style="list-style-type: none"> • Periodic Certification forms completed • Personnel Activity Report forms completed • Title I, C State Conference

	<ul style="list-style-type: none"> ● Continue with implementation of action steps 	<ul style="list-style-type: none"> ● Complete ACCESS for ELL's
January 2019	<ul style="list-style-type: none"> ● Complete ABC Data Review sheet for the 2nd 9 weeks (quarterly data) ● Continue with implementation of action steps 	<ul style="list-style-type: none"> ● Update Remediation Plans for non PQ Personnel ● Migrant Winter PAC meeting (December 13, 2018) ● 2nd Set of APTT meetings continue ● Parent surveys for school level and district level updated to send home to parents ● Teacher surveys updated
February 2019	<ul style="list-style-type: none"> ● Complete ABC Data Review sheet for January ● Continue with implementation of action steps 	<ul style="list-style-type: none"> ● Title III Conference ● Title I, A Regional Meetings ● GCEL Conference ● Administer Parent Surveys ● Administer ACCESS for ELLS continued ● PD for staff on building capacity for non APTT schools (provided by district) ● FELT meeting
March 2019 – June 2019	<ul style="list-style-type: none"> ● Continue with implementation of action steps ● Complete ABC Data Review sheet for February, March, and 3rd 9 weeks (quarterly data) ● Begin reviewing survey data and student achievement data ● Complete review of current year's SIP with Leadership/SIP Team ● Submit Annual SIP Evaluation ● Review CNA for any needed changes for the FY20 SIP process ● Complete ABC Data Review sheet for April ● Conduct school improvement planning meetings with Leadership/SIP Team to review data and conduct an after action review from the 	<ul style="list-style-type: none"> ● Close Parent Survey by end of March 2018 ● Federal Programs TA for Administrators ● Conduct Annual Title I Meeting for revision of compacts, parent involvement policies, CLIP, and school improvement plans ● Title II, A Regional/State Meetings ● Title I, C Migrant Regional Meeting ● Migrant Spring PAC meeting ● On site or self-monitoring ● <u>May</u>--Complete Periodic Certification forms ● Review Migrant Implementation Plan Post-Data ● Review ESOL ACCESS data ● Federal Inventory Sign Off ● Parent and Teacher Surveys for school level and district level completed by March 29, 2019 ● Update FY20 Parent and Family

	<p>previous SIP school year</p> <ul style="list-style-type: none"> ● Complete ABC Data Review sheet for May, 4th 9 weeks (quarterly data), STAR post-assessment data, and year-end data points ● Revise SIPs/Develop a minimum of two SMART goals for the upcoming school year that align to district goals 	<p>Engagement Plan and Compact using survey results</p> <ul style="list-style-type: none"> ● 2nd Set of APTT meetings data upload due to GADOE March 8th, 2019 ● APTT 3rd Set of meetings completed by end of April ● APTT Focus group meeting held during April or May to set goals for FY2020 APTT meetings ● 3rd Set of APTT meetings data upload due to GADOE May 24th ● Train WCHS and MPMS for implementation building capacity for non APTT schools (provided by district)
Monthly	<ul style="list-style-type: none"> ● Periodic Certification forms completed ● Personnel Activity Report forms completed ● PD at APTT Schools ● Attend Family Connection meetings ● Provide Parent Engagement guidance as needed 	<ul style="list-style-type: none"> ● Review Migrant CER and Occupational Survey updates ● Meet with Homeless Liaison

Technical Assistance

Technical Assistance is offered at all times through e-mail and phone communication as well as school visits to assist schools in analyzing data to identify priorities in instruction, professional learning, and effective budgeting. At the beginning of the school year, a principals’ meeting is held in which the purpose of all federal programs, as well as expectations and procedures related to allowable use of funds, is reviewed. Additional federal programs meetings are scheduled in November and March to provide additional TA to principals. The Federal Programs Director maintains a file of all training conducted throughout the year. Ongoing monitoring after training is conducted by the Federal Programs Director to ensure compliance.

Corrective Action Process

Corrective action from previous monitoring is discussed with principals in order to assist them in understanding the critical need for compliance in federal programs. Professional learning is provided based on need. In addition, professional learning is used as a preventive measure to ensure that all administrators and federal programs staff have a clear understanding of all expectations for every facet of the federal programs. The Federal Programs Director, along with district level staff and outside consultants, provide on-going training as a means of ensuring that federal programs are in compliance at all times.

If with ongoing coaching and support by the Federal Programs Director and district mentor the school still fails to meet the required components of the GADOE Schoolwide Program Checklist and/or the guidance pertaining to compliance, the Federal Programs Director will forward a written notification of concern to the school principal and will copy to the superintendent. The superintendent will then become involved in a written corrective action plan for the school site if concerns are not remediated within a two-week period. The written corrective action plan will be in place and include more intensive support by district office personnel for a minimum of six months. After six months, when the school principal corrects compliance issues and/or meets the required components of the written corrective action plan, the corrective action plan will be deemed as fulfilled.

School Improvement Plans

A timeline for the development of the school improvement plan is provided in March of each year. School Improvement Plans are developed from April through August of each year. Each school leadership team is responsible for conducting data analysis, determining overarching needs, determining root causes, and defining SMART goals. After SMART goals are established, the leadership team begins developing action steps to support the SMART goals. At the first administrative meeting of the year (July), district directors work with the principals to formally review a draft of the school improvement plan. External stakeholders are involved in the planning, revising, and implementing phases of the process. Principals, with their school leadership teams, finalize the plan after leadership team meetings resume. Technical assistance continues as implementation of the school improvement plan occurs and budgets are developed for professional learning, interventions, and parent and community engagement. Additionally, district directors attend leadership team meetings at each school throughout the year to coach the teams. Parents

are sent information via mail, email, telephone, flyers, website, and newsletters inviting them to participate in the revision process at an annual Parent Advisory Council meeting. Once revisions are made, the plan is placed on the website. Hard copies are also available at the schools.

Evidence-Based Action Steps

Georgia's efforts to improve student outcomes relies on evidence-based interventions. Schools are reminded that all interventions must be evidence-based as defined by ESSA. ESSA defines an evidence-based activity, strategy, or intervention as being supported by strong evidence, moderate evidence, promising evidence, or evidence that demonstrates a rationale ESSA 8101(21)(A). Schools are encouraged to utilize the What Works Clearinghouse website <https://ies.ed.gov/ncee/wwc>, Evidence for ESSA website <https://www.evidenceforessa.org/>, and the Best Evidence Encyclopedia website <http://www.bestevidence.org/>.

Review and Approval of School Improvement/Schoolwide Programs

School Improvement and Schoolwide Plans are updated each year. All schools within the Wayne County School System conduct Schoolwide Programs. This allows all children and all parents an opportunity to have equal access to all related Title I assistance. School leadership members representing various grade level, content area, and departments work to analyze data, assess the progress of the prior year's plans, and revise plans for the upcoming year to reflect the goals and strategies for meeting the academic needs of their students. System administration participates and supports the team in that process while also working with these teams to develop the system CLIP. Assistance is also provided to schools in their use of school improvement funds to accomplish initiatives in their school improvement and schoolwide plans. Meetings are held with principals to discuss the current status of their plans in regard to checklist components.

Schoolwide Plans are updated and verified using a checklist after receiving feedback at Annual Title I Parent Meetings. The GADOE Schoolwide Program Checklist is used to document successful completion of the requirements of a Schoolwide Program. Completed checklists are maintained in the office of the Federal Programs Director. Missing items or items in need of revision are marked on the checklist and then rechecked when the revised plan is submitted.

Monitoring Use of Funds

The Federal Programs Director communicates with each school quarterly (during the principals' meeting) to review and assist as needed in budgeting decisions.

Submitting Amendments

If a principal determines that a change needs to be made in the school budget for a change in line items, the principal should make contact with the Federal Programs Director to discuss the possible amendment and the reason for the change in the funding. If the Federal Programs Director determines that the change in budget amounts should be amended, the principal will be required to make the request for the amendment in writing. The budget amendment will be completed and, when approved, a revised budget will be emailed to the principal.

Process for Identification of High Risk Schools

The Wayne County School System will use state data reports to identify any schools at risk. If a school is identified, the district will meet at the beginning of the school year or within a timely manner after the report is received to determine a plan of action for addressing the at-risk school's needs and what resources may be needed to support the school in the implementation of the at-risk school's action plan. Other considerations will include school leadership, CCRPI scores, and attrition rates.

School Improvement 1003(g)(SIG)

The Wayne County School System does not currently have any participating schools in this grant. If applicable, the Wayne County School System will follow all federal and state guidance.

ESEA Public School Choice

Wayne County Schools are currently not required to offer Public School Choice.

Consolidation of Funds

Wayne County Schools do not consolidate federal funds.

Development of New Schoolwide Programs

All schools within the school system have schoolwide programs.

Target Assistance Programs

The Wayne County School System does not have any target assistance programs. In the future if the district has a school which would require Targeted Assistance, guidelines and procedures provided by the GaDOE will be implemented.

Monitoring of Private Schools

The Federal Programs Director monitors participating private schools. The Wayne County School System participates in the “Equitable Services” state consultation meetings in which presentations and information are provided about the programs available to students in private schools. Invitations for the state consultation meeting dates, times, and locations are sent to all private schools in which a DE1111 form has been received in October. A follow up contact is made, normally via email, if no response about attendance at the meeting is received from the private school. Currently, the Wayne County School System is not serving any private schools through the Title programs.

Cross Functional Monitoring Findings

The Wayne County School System undergoes Cross Functional Monitoring as scheduled by the State of Georgia. Corrective action plans are created to correct any findings received. The school system will maintain the appropriate documentation to indicate that correction actions have been completed and any findings have been cleared.

Steps to Audit/Monitoring Resolutions:

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

The monitoring process and the resolution process are both used as a learning resource. Reports can be accessed either from the warm site or locally with internet access.

All programs are subject to the exercise of internal controls as mandated by the district’s internal control procedures. Supporting source documentation is kept on file in the district central office for

all program revenues and expenditures and for all program payment, reimbursement, and draw-down requests.

SECTION 10: PARENT AND FAMILY ENGAGEMENT

Parent and Family Engagement Policy Overview

Wayne County Schools has an on-going commitment to our Title I parents. Parental engagement is defined as an ongoing process that increases active participation, communication, and collaboration between parents, schools, and communities. Our goal is to ensure that Title I parents and their children receive extraordinary services and assistance that will ensure educating the whole child to ensure student achievement and success. The district recognizes that parents are an integral part of a child's success in school, starting with the concept of being the child's first teacher. The district will assist parents of all socioeconomic levels as efforts are made to create an educational experience that allows all children to reach their full potential.

Parent Notification and Communication

When parents mark on the enrollment form that they need correspondence in another language, to the extent practical, efforts are made to provide either written support or verbal support through an interpreter. The Federal Programs Director, as well as school staff who are fluent in multiple languages, supports these efforts. Furthermore, parent communication is written in a format so that the content is easily understandable.

ESEA Public School Choice

Wayne County Schools are not required to offer school choice at this time.

Teacher and Paraprofessional Qualifications

Parents are informed of their rights to know the qualifications of their children's teacher(s). This information is sent home to every parent in the beginning of the year in each student's handbook. The notice will include the specific contact person and telephone number and email address. This information is also made available through district and school websites and the Title I Brochure sent home with students. New students will receive a copy of the handbook and Title I Brochure upon registration.

Professionally Qualified Teachers

The Wayne County School System is a strategic waiver system and has waived certification for all areas except Special Education. If a student has been assigned or has been taught for four or more consecutive weeks by a teacher of Special Education students, parents will be provided timely notice.

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

Parents may request and receive information regarding:

- 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

Each school in the Wayne County School System holds revision meetings. These meetings give parents the opportunity to review and provide feedback on system-wide student data, parent activities, district and school Parent and Family Plans, Schoolwide Title I plans, and district and school improvement plans. Parents are also given the opportunity to provide input on how parent engagement funds are spent to build staff capacity for teachers. All schools notify stakeholders of the Annual Title I Parent Meeting in multiple ways. Parents are notified about this opportunity through advertisements in local media, school-level flyers, social media web sites and the system web site. Parents who cannot attend the meeting will be given the opportunity to obtain a copy from each school and submit input before the final revisions are approved. Revision dates will be clearly marked on each plan. The Parent and Family Engagement Specialist is responsible ensuring all schools and the district collect the required information (agenda, meeting notes, advertisements, and sign in sheets, etc.) needed for the Revision and Adoption meetings.

After the review/revision process, district and school Parent Involvement Plans are made available to parents on the district website and on Title I schools' websites. Copies are also available in each school's front office and/or parent resource centers. Parents are also given the opportunity to provide feedback about Title I programs by completing annual parent surveys. These comments are used by the District and Title I schools when planning programs.

Distribution of Completed Plans

School and system level plans are shared with faculty, staff, students, parents, and community members on the Wayne County School System Federal Programs web site located at:

<http://www.wayne.k12.ga.us>

Plans include district and school improvement plans, parent and family engagement policies, Title I schoolwide plans, school compacts, comprehensive LEA improvement plan, parents' right to know, complaint procedures, and policy on ethics and fraud, waste, and abuse. Many of these plans are included in student handbooks. Stakeholders' input into the content of each plan is solicited during multiple meetings throughout the school year. The parent and family engagement plans are distributed and discussed during the Annual Title I meeting.

School-Parent Compacts

All Title I schools are required to have parent compacts. The school compact is a part of the parent and family engagement plan. It is the responsibility of the principal in coordination with the Parent Involvement Coordinator to make sure that all compacts are reviewed and revised annually. The review and revision will occur in the spring of the year at the revision and adoption stakeholders' meetings. Revision dates will be clearly marked on each compact. An invitation will be sent home to all parents in the school and meeting dates will be given in school newsletters and through the school's web site. The Parent and Family Engagement Specialist will be responsible for assisting in scheduling and facilitating meetings and collecting required information (agenda, meeting notes, and sign in sheets). Parent compacts will include responsibilities for the teacher, parent, and students. Compacts will be distributed to all parties involved for signatures in the fall of the year. Copies of the signed parent compacts are kept at each school site. The rights of parents to participate in the development of the goals and objectives of the public schools is pertinent to family and community engagement and encourages parental engagement in all areas of children's educational experiences.

Annual Title I Meeting

All Title I schools are required to hold an annual meeting at the beginning of school. It is the responsibility of the principal in coordination with the Parent and Family Engagement Specialist to arrange meeting times and invite all stakeholders to the meeting. The Parent and Family Engagement Specialist will be responsible for ensuring all schools collect and submit

documentation of the required Title I annual meeting, including a copy of the sign in sheet, agenda, and minutes to the Parent and Family Engagement Specialist. Many schools schedule their Title I meetings in conjunction with Curriculum Nights or Academic Parent Teacher Teams (APTT) meetings to promote higher levels of parent participation. These meetings are announced via paper notices to parents, web sites, call system, local media, and marquees at each school.

Annual Evaluation

The parent survey is conducted in the winter. In addition, an AdvancED survey is conducted periodically in the spring. Both surveys are conducted online. However, parents are informed of the availability of a paper survey and may request a paper copy. Advertisement of the surveys and requests for completion occur through the newspaper, newsletters, web site, automated phone calls, and radio announcements. The surveys are collected and compiled and the following year's parent and family activities are built from the responses.

The results of the surveys are shared among several groups of stakeholders, including, but not limited to parents, school and central office administration, and Parent and Family Engagement Specialist.

Federal Programs Director and Parent and Family Engagement Specialist review the annual survey as well as feedback from all parent engagement activities. Notes are made as to possible revisions for the following year. This parent and family engagement workshops and activities are planned for the following year from the annual survey results. Materials are also purchased for parent resource centers when needs are expressed. Many opportunities are provided for building strong parent capacity. The purpose is to ensure effective engagement of parents and to support a partnership among the schools, parents, and the community to improve student academic achievement. Some of the many parent engagement activities are as follows: annual meetings, conferences, e-mail communications, phone calls, parent workshops and activities, APTT, family nights, volunteering, open houses, annual notification of CCRPI scores, GOSA state report cards for district and schools, `newsletters/flyers/brochures, website information, and Board of Education meetings.

Parent Capacity

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

The Parent and Family Engagement Specialist considers and plans based on the six requirements for building capacity by answering the following questions:

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

School Staff Capacity

Title I schools implementing Academic Parent-Teacher Teams (APTT) and showing documentation of implementing APTT with fidelity will have met the requirements of building capacity for both school staff and parents. Professional Development for parent engagement will be held at least two times per semester at each Title I school that has not implemented APTT. This professional development will be either completed in person or via online faculty meetings. Agendas, sign-in sheets with date, roles of attendees, and signatures of teachers, specialized instructional support personnel, principals, other school leaders, and other school staff, presentation slides, training materials, handouts, or meeting minutes/notes that show evidence of these meetings will be kept. Secondary methods include continuous communications with faculty, such as emails with links to articles, social media posts, online training videos, tip sheets, flyers, handouts, brochures, website screenshots, and other online resources that provide evidence of this professional development. The Parent and Family Engagement Specialist will ensure these trainings are conducted and give technical support to the

schools. Parents are given the opportunity to give input to the type of professional development that will be used through surveys, evaluations, and meetings.

Parent Resource Centers

All schools have parent resource centers either as a separate room or within their media centers. A variety of materials and resources are available to parents for use at the school for checkout or as handouts. Books, tapes, videos, DVDs, and a variety of other materials have been purchased for the parents. Many purchases are based upon parent requests on the parent engagement surveys, and counselors have materials on several different topics, such as helping with homework and information regarding bullying.

Schools are required to notify parents of the availability of the resources in the parent resource center. This is typically achieved through a flyer and/or websites and includes information on the types of resources available in or through the resource center.

Required 1% Set Aside for Parental Involvement

Principals have the option of expending the 1% in Parent Involvement funds or submitting them back to the system level. The funds are used at the district level to fund a Parent Involvement Coordinator that serves all schools. Title I parent advisors participate in the discussion regarding this requirement during Title I meetings.

SECTION 11: SERVICES FOR HOMELESS CHILDREN AND YOUTH

In accordance with the Education for Homeless Children and Youths: Subtitle B of Title VII of the McKinney-Vento Homeless Assistance Act, as amended by the ESEA of 1965, all eligible children and youth experiencing homelessness who reside within the Wayne County School System are entitled to a free, appropriate public education. Homeless children are given the opportunity to participate in all programs for which they are eligible.

Administrative procedures which provide for the admission and services for students in transition and/or experiencing homelessness shall be established and maintained under the direction of the Superintendent. These procedures shall include provisions to resolve conflicts which may arise as a result of this policy's implementation.

Each child of a person experiencing homelessness residing within the Wayne County School District is entitled to a free, appropriate public education. Students identified as “homeless” or “in transition” will be given a full opportunity to meet state and local academic achievement standards and will be included in state and district assessments and accountability systems. The district will ensure that children and youth in transition are free from discrimination, segregation, and harassment.

The Student Services Director, who is also the homeless liaison, works with, consults, and trains school personnel, including school social workers, counselors, attendance officers, enrollment clerks, teachers, principals, and bus drivers, to identify children in homeless situations. S/he is consulted if there is a need for transportation to a school of origin, and s/he makes the arrangements through the transportation department. The homeless liaison monitors and provides the information on the annual count of homeless students attending school in Wayne County.

Definitions

The McKinney-Vento Homeless Assistance Act (Act), 42 U.S.C. § 11434a (2) et. seq., identifies homeless children and youth as those who lack a fixed, regular, and adequate nighttime residence, including those who:

1. Share the housing of other persons due to the loss of housing, economic hardship, or a similar reason;
2. Live in motels, hotels, trailer parks, or camping grounds due to the lack of alternative adequate accommodations;
3. Live in emergency or transitional shelters;
4. Have 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;
5. Live in cars, parks, public spaces, abandoned buildings, substandard housing, bus or train stations, or similar settings;
6. Have been abandoned in hospitals;
7. Are migratory and live in the conditions as described above.

Unaccompanied youth means a youth not in the physical custody of a parent or guardian, who is homeless or in transition as defined above. The more general term youth also includes unaccompanied youth.

Immediate means without delay

School of origin means the school the child or youth attended when permanently housed, or the school in which the child or youth was last enrolled.

Liaison is the staff person designated by Wayne County Schools as the person responsible for carrying out the duties assigned to the Liaison by the McKinney-Vento Act

Identification

In collaboration with school personnel and community organizations, the district homeless liaison will identify children and youth experiencing homelessness within the Wayne County School District.

The liaison will:

- Ensure school personnel are trained on possible indicators of homelessness, sensitivity in identifying families and youth as experiencing homelessness, and procedures for forwarding information indicating homelessness to the liaison.
- Collect and maintain data on homeless children in the student information system.
- Collaborate with the State Coordinator for the Education of Homeless Children and Youth and community partners, including family and youth shelters, soup kitchens, motels, campgrounds, drop-in centers, welfare departments, and other social services agencies, faith based organizations, truancy and attendance officers, local homeless coalitions, and legal services, to ensure identification of homeless children.

School Selection

Each child and youth experiencing homelessness has the right to remain at his or her school of origin or to attend any school that students living in the same attendance area are eligible to attend. In selecting a school, children and youth experiencing homelessness should remain at their schools of origin to the extent feasible, unless it is against the parent or youth's wishes or is not in the best interest of the child. Children may remain at their schools of origin the entire time they are experiencing homelessness and until the end of the academic year in which they become permanently housed. Children or youth who lose their housing between academic years have the same options. Feasibility or best interest determinations shall be a child-centered process and may include the following considerations:

1. Safety of the student
2. Continuity of instruction
3. Likely area of family or youth's future housing
4. Time remaining in the academic year
5. Anticipated length of stay in temporary living situation
6. School placement of siblings
7. Special needs of the student that would render the commute harmful

Enrollment

A child or youth experiencing homelessness must be enrolled immediately without delay due to lack of any document normally required for enrollment. If a student in transition presents himself or herself without a parent/guardian, the student shall be enrolled immediately and the school shall notify the Student Services Director. The Student Services Director shall contact the parent/guardian and will help facilitate completion of the enrollment process. The student must meet the district's age eligibility for enrollment. Unaccompanied youth may enroll themselves or be enrolled by a parent, non-parent caretaker, older sibling, or the district's liaison. Lack of the following documents cannot be a barrier to enrollment:

1. Proof of residency
2. Transcripts/school records
3. Immunization/health/medical/physical records
4. Proof of guardianship
5. Birth Certificates
6. Any other document requirements
7. Unpaid school fees
8. Any factor related to the student's living situation
9. Lack of uniforms or clothing that conforms to dress code

When a student enrolls without education or medical records, the enrolling school must contact the student's previous school to obtain records. Initial placement of students whose records are not immediately available can be based on the student's age and information gathered from the student, parent, and previous schools. If the student lacks immunization or other required health records, the school will contact the homeless liaison for assistance in referring the student to the Wayne County Health Department to get required immunizations.

If the school is contacted by another school or school system for a homeless student's records, requested information should be provided in accordance with the Family Educational Rights and Privacy Act (FERPA), and school records should be sent within 10 days to the receiving school or school system.

Transportation

Homeless children and youth are entitled to receive transportation provided to non-homeless students. To avoid unnecessary school transfers, transportation will be provided to and from the school of origin at the parent's request and if the request is deemed in the best interest of the child. Transportation will be provided the entire time the child or youth has a right to attend the school of origin, including pending disputes.

The Student Services Director shall request transportation to and from the school of origin if it is in the best interest of the child. Arrangements shall be processed without delay in collaboration with the transportation department. Transportation requests will be reported to the homeless liaison who will intervene if any problems should occur.

Services

Children and youth experiencing homelessness shall be provided services comparable to services offered to other students in the school selected, including:

- Transportation
- Title I
- Educational services for which the student may be eligible, including special education and related services and programs for English Language Learners
- Vocational and technical education programs

- Gifted and talented programs
- School nutrition programs
- Extended learning opportunities as applicable

The Federal Programs Director and homeless liaison will coordinate Title I and McKinney-Vento services. Children and youth experiencing homelessness will be assessed, reported, and included in accountability systems as required by federal law and the U.S. Department of Education regulations and guidance. Children and youth who are homeless are automatically eligible for Title I, Part A services whether or not they attend a Title I school or meet the academic standards required of other children for eligibility.

Children and youth experiencing homelessness are automatically eligible for free meals as determined by the U.S. Department of Agriculture. Schools who enroll homeless children and youth must submit their names to the district nutrition office on the day of their enrollment for immediate processing.

School personnel should inform parents of the educational and related opportunities available to their child and provide parents with meaningful opportunities to participate in their child's education. All parent information required by any provision of this policy should be provided in a form, manner, and language understandable to each parent.

Title I funds can be used to provide activities other than direct instruction to promote student achievement, provide academic support to students, meet basic needs, support homeless liaison position, hire tutors, provide reach out programs to parents of homeless children, provide after-school and/or summer programs, pay fees for obtaining birth certificates and immunizations, school projects or field trips, AP and SAT/ACT testing, provide counseling services, defray medical and dental expenses, provide transportation to and from school of origin.

Title I funds may NOT be used to provide rental assistance for homeless families, clothing assistance for families, cost of sports physicals, yearbooks, prom fees, or transport homeless students.

Dispute Resolution

If a dispute arises over any issue covered in this policy, the child or youth in transition shall be admitted immediately to the school in which enrollment is sought pending final resolution of the dispute. The student shall have the same rights to all appropriate education services,

transportation, free meals, and Title I services while the dispute is pending.

The school where the dispute arises will provide the parent or unaccompanied youth with a written explanation of its decision and the right to appeal and will refer the parent to the homeless liaison. The homeless liaison will ensure that the student is enrolled in the requested school and receiving services, as needed, until the dispute has been resolved. The parent or unaccompanied youth will be given every opportunity to participate meaningfully in the resolution of the dispute. The district liaison will keep records of all disputes in order to determine whether particular issues or schools are repeatedly delaying or denying the enrollment of children and youth in transition.

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

SECTION 12: SERVICES FOR NEGLECTED AND DELINQUENT CHILDREN

The purpose of Title I, Part D is to improve educational services for children and youth in local and State institutions for neglected or delinquent children and youth so that such children and youth have the opportunity to meet the same challenging State academic content standards and challenging State student academic achievement standards that all children in the State are expected to meet. The purpose is also to provide such children and youth with the services needed to make a successful transition from institutionalization to further schooling or employment. There are no facilities in Wayne County that serve neglected students.

SECTION 13: TITLE I, PART C—MIGRANT EDUCATION (MEP) SERVICES

The purpose of the Migrant Education Program (MEP) is to provide supplemental educational services to eligible migrant children (ages 3 to their 22nd birthday) whom have not attained either a high school diploma or a GED diploma. Identified migrant children with unmet needs are provided supplemental instructional and/or support services during the regular school year and summer months using Title I, Part C funds awarded by the GADOE. Eligible migrant students to be served include preschools age participants (home or facility based), students enrolled in grades K-12, and students aged 16-21 not enrolled in school (out-of-school youth) and drop outs.

Records Maintenance and Transfer

The Director of Federal Programs ensures *maintenance of records* of the migrant students and helps expedite the *transfer of records*, as needed. Upon request, records are transferred within the 10 days as required by state law. Any records that are not requested are sent to the Records Department at the end of the school year. The U.S. Department of Education sponsors a national records transfer initiative designed to address the transfer of student records. The Migrant Student Information Exchange, MSIX, is the technology that allows states to share educational and health information on migrant children who have student records in multiple states' information systems. MSIX works in concert with existing migrant student information systems that states currently use to manage their migrant data (SLDS).

Identification and Recruitment

Students register at their zoned school for enrollment purposes. Potential migrant students are *identified* through the occupational survey, which is included in all Wayne County registration packets and distributed to every student during the first week of school. Once completed, ALL surveys are removed from the packet at each school and forwarded to the Migrant Support Specialist Person (MSSP). If the parent has answered yes to the migrant questions, the forms are sent to the Region 2 MEP office who makes a final determination of the migrant status by interviewing the parents. Recruitment activities are ongoing throughout the regular school year and summer months, including various times of the day and weekend. During the summer months, the state MEP recruiter comes to Wayne County to recruit families.

Migrant Support Specialist Person(s), MSSP's, are hired by the Wayne County School System and are trained by the state to complete the ID&R duties, the development and implementation of the ID&R Plan, to review the occupational surveys, to identify the qualifying activities in the district and the months when families move into the area, and to complete the Certificate of Eligibility (COE) for new participants. The MSSP's meet with the Director of Federal Programs at least monthly to provide updates on recruiting efforts, tutoring, and other services provided to migrant students.

Enrollment numbers are posted monthly to the MEP website on the Consolidated Application. The following reports from the GaDOE are posted to the Consolidated Application: Current Enrollment, Current Participant, Priority for Services, New Participants, New Student Lists, and Three Year Old Lists. All are printed and kept in the MSSP office.

SECTION 14: TITLE II, PART A—SUPPORTING EFFECTIVE INSTRUCTION

The purpose of the Title II, Part A grant is:

- to increase student achievement consistent with challenging State academic standards,
- to improve the quality and effectiveness of teachers, principals, and other school leaders,
- to increase the number of teachers, principals, and other school leaders who are effective in improving student academic achievement in schools, and
- to provide low-income and minority student greater access to effective teachers, principals, and other school leaders.

The LEA may not use Title II, Part A funds to pay for activities that, in the absence of these funds, would be provided with state and local funds. The Director of the Title IIA program ensures that Title II, Part A funds are only used to supplement educational program activities provided with state and local funds by following the guidelines below:

The Director reviews the allowability of expenditures to determine if it meets the criteria under Supplement not Supplant provision. If the expenditure is allowable, then the protocol outlined under allowability procedures, as identified in the Wayne County Federal Programs Manual, is followed.

ESSA, Equity, and Professional Qualifications

Wayne County has an approved Equity Plan which is a part of the CLIP. Two equity gaps are identified while developing the Equity Plan. As gaps are identified, strategies and interventions are written as part of the plan to reduce the gaps in the data.

Needs Assessment and Planning

The needs assessment process begins in February as the system begins to evaluate programs, reflect on data, and plan for the coming year. All eight schools in the Wayne County School System carry the designation of Title I schools; therefore, a comprehensive needs assessment that includes multiple stakeholder involvement, is required. The results and findings from the Title I schools are shared with district leaders to assist with planning. During the needs assessment processes, various stakeholder groups study different types of data: assessment, perception, equity, and attendance, behavior, and coursework data sets. As this data is used to determine overarching needs, action steps are written for the “Professional Capacity” system of the District Improvement Plan. The

implementation of these action steps will be monitored for fidelity throughout the year. This same process for school improvement is implemented at the school level. The school-based plans are submitted to the district mentor and shared with the district leadership team. The implementation at the school level is also monitored. Reporting on the progress of the school improvement plans is part of the principals' meeting agenda each month.

Equity in Student Access to Effective Instruction

Teachers that hold clear renewable certification and are professionally qualified are given priority for employment in Wayne County. Once hired, principals have discretion at making assignments. The principals, along with the administrative teams at the schools, consider the strengths and weaknesses of teachers, the needs of the students, and the grade level team or content area to make best placements. In addition, a variety of data sources such as attendance, discipline, and achievement results, along with teacher evaluations, are reviewed when making teacher placements. Efforts are made to provide balance among content areas or grade levels with regard to teacher age, race, and gender. Principals are also strategic in placing some of the strongest teachers with the weakest students.

The Wayne County School System utilizes the GADOE TKES to evaluate teacher effectiveness. All teachers who provide direct instruction to students are evaluated with this model. An overall rating of teacher effectiveness is also determined. As part of the TKES process, principals are utilizing the SLDS platform to analyze student growth by teacher.

The Human Resource Director works with principals to ensure that teacher assignments are made with consideration of new and veteran teachers. As open positions are filled with new/inexperienced teachers, assignments are made in a manner so that veteran experience exists in every grade level or in every department. Middle school principals carefully review their teacher teams to ensure that different levels of experience and expertise are represented on their teams. Existing staff experience is monitored by the principals and the Human Resource Director, and teachers are shifted among grade levels if necessary to acquire teacher experience equity.

Teachers with PLP's also are given assignments in a strategic manner to avoid students having more than one teacher on a PLP. Teachers who are identified as ineffective must develop a professional learning plan (PLP) with the principal. Documentation of the evaluation and PLPs are housed in the TLE platform and are reviewed by The Human Resource Director. The PLP must be written and

monitored at least quarterly until the requirements are met. Targeted professional learning is part of the PLP and specific needs are communicated with the Director of Human Resources. Teachers who are identified as less than proficient receive additional support from the school instructional coach, as well as the building-level principal. Principals monitor the teachers on PLP's by observing and providing feedback to the teachers. If additional support is needed, the Human Resources Director may be contacted to participate in observations and provide feedback at debriefing sessions. If no improvement is observed or no progress is made on the PLP, teachers may be reassigned to other duties or relieved of duties even before the end of the school year. Teachers on a PLP are not transferred to other schools until the PLP can be resolved.

There is annual communication by the Human Resource Director with principals to remind them of the requirement of not placing a student two years in a row in inexperienced, ineffective, or out-of-field teacher classrooms. Principals will work with the registrars/counselors to monitor student placement to guarantee that this requirement is followed. An ineffective teacher will be defined as provided in the Teacher and Leader Keys Effectiveness System.

LEA Reporting of Professionally Qualified Personnel

The Human Resources Director reviews each personnel file each quarter to be certain that teachers are meeting deadlines for earning professionally qualified status or obtaining a clear renewable certificate. Emails or formal memos are sent to the teacher and copied to the principal as well as the Superintendent's office as consistent reminders of the expectation for compliance to the plan. Teachers who fail to meet the guidelines or timelines of the plan may not be offered a contract and are notified in writing that their contract will not be renewed.

Professionally Qualified Teachers and Paraprofessionals

Federal law requires states and LEAs to ensure ALL teachers meet state certification requirements. In Georgia, state law allows LEAs to waive certification. However, the LEA must establish the professional qualification requirements for ALL LEA teachers. Additionally, federal law requires states to publically report the number of teachers who are not teaching in the subject or field for which the teacher is certified. For LEAs that waive content area certification, teachers may demonstrate equivalent in-field qualifications by degree, coursework, or content area test as reported in the Fall CPI Cycle 1.

LEAs may not waive certification for Special Education teachers. All teachers must have a clearance certificate. If the Special Education teacher issues grades in content area courses, the teacher must hold certification or the equivalent in the corresponding content areas and grade level bands.

Parent Notification

In compliance with the requirements of ESSA, parents may request the following information:

1. Whether the student’s teacher has met state qualification and licensing criteria for the grade and levels and subject areas in which the teacher provides instruction, is teaching under emergency or other provisional status through which State qualifications or licensing criteria have been waived, and is teaching in the field of discipline of the certification of the teacher.
2. Whether the child is provided services by paraprofessionals and, if so, their qualifications. Information about parents’ “right to know” of teacher/paraprofessional qualifications is in the School System Information Packet that goes home with every child. Information about the parents’ “right to know” is also available on the Wayne County School System website, in parent handbooks, in the Title I brochure that Title I gives to parents, and on school websites. (ESSA)

SECTION 15: TITLE III, PART A—LANGUAGE INSTRUCTION FOR ENGLISH LEARNERS

Monitoring Title III at the local level ensures compliance with regulations and assures the quality of the program and the instructional delivery being utilized with English Learners. Title III of the ESEA requires the Georgia Department of Education to report annually on the progress of English Learners toward English language proficiency. The GaDOE is also charged with the responsibility of providing quality assistance to LEAs and schools serving English Learners.

The GaDOE ESOL/Title III Unit’s Title III monitoring process consists of a *Self-Assessment Report* that is completed by local school districts in Georgia, a response to the *Self-Assessment Report* from the GaDOE, on-site monitoring of selected districts, and a post-monitoring report from the GaDOE for each LEA that received an on-site visit. Alternatively, the development and maintenance of a GaDOE-approved District ESOL Program Plan may be accepted in lieu of the *Self-Assessment Report*.

Private School Consultation

Title III is included in the *District Invitation to Private Schools to Consult* letter that is sent by certified mail to all private schools in October for participation in programs for the following year. An informational meeting is held to discuss equitable services with private school representatives who attend. Those who respond affirmatively attend the meeting where the Director of Federal Programs explains the intent of each program and hands out letters of Intent to Participate. In lieu of a district meeting for private school consultation, the Federal Programs Director may join the state consultation meeting hosted by the GADOE and invite private school representatives to the state consultation meeting.

Records and Maintenance

The Georgia Department of ESOL & Title III Required Home Language Survey is a questionnaire administered upon enrollment to each student's parent or guardian for the purpose of determining whether a language other than English is used by the student or used in the student's home. The Home Language Survey contains the following questions on a separate form in the Wayne County Schools registration packet:

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

All home language surveys are sent by school data clerks to the Instructional Supervisor (6-12); the Instructional Supervisor then disseminates surveys to the ESOL teachers when any language other than English is used in the home. Students are then screened by the ESOL teachers using the WIDA ACCESS Placement Test (W-APT). The W-APT is used to assess students' current level of English language proficiency and to determine whether or not students are eligible for the English to Speakers of Other Languages (ESOL) program, following the most current criteria as set by the Georgia Department of Education. The W-APT must be administered within 30 days of the child entering school. If the child qualifies for ESOL services, the "Title 1 Notification of Student Eligibility for Supplemental Language Support Services" parent notice is sent home to the parents in English and in a format and language that the parents can understand. The date of distribution is included on the letter. The distribution of the letter can be sent via secure email to the parents/guardians or through the US Postal Service documented by a postage receipt.

A copy of all parent notices should be forwarded to the office of the Instructional Supervisor (6-12) at the Wayne County Board of Education within five working days after the notice is distributed to parents. The copy of the letter may be forwarded to the Instructional Supervisor by email notice or with hard copy through interoffice mail. If parents cannot be contacted through one of these two methods, the ESOL teacher should contact the Instructional Supervisor (6-12) to discuss other methods for parent notification. A list of students with the method and proof of distribution will be maintained in the office of the Instructional Supervisor.

The ESOL teacher prepares an ESOL folder for any new student, which remains part of his/her permanent record. The folder will contain all pertinent ESOL information for that student. The student is scheduled for ESOL services, following FTE guidelines for segment lengths and the number of segments:

- Grades K-3 = 45 minute daily segments or a minimum of 225 minutes weekly
- Grades 4-8 = 50 minute daily segments or a minimum of 250 minutes weekly
- Grades 9-12 = 55 minute daily segments or a minimum of 275 minutes weekly

For ESOL FTE funding purposes:

- Students in grades K-3 may be served one segment per day.
- Students in grades 4-8 may be served up to two segments per day.
- Students in grades 9-12 may be served up to five segments daily.

The student demographic information is entered into Infinite Campus, the student information system, with an EL code. The student's date of entry into the U.S. and date of entry into U.S. schools is a part of the record.

Students who exit from the ESOL program using the state criteria are monitored for a period of four years (documented in the SIS). If a student struggles during the monitoring period, the MTSS team determines next steps for appropriate interventions and any potential increased Tier monitoring. After instructional interventions have been put in place and progress is measured over time as data, documentation, and any additional evidence are reviewed, the MTSS team and the ESOL teacher determine whether the student is struggling because of a lack of content knowledge or whether the student is struggling because of a lack of language. Factors, as outlined in the Georgia ESOL Title III Resource Guide, are considered before it may be determined whether the student should be placed back into language assistance services.

Professional Learning

Teachers are encouraged to become ESOL endorsed if there is interest in the ESOL positions in the system. The district desires to have ESOL endorsed teachers at every grade level at every school who serve as general education teachers, as well as ESOL teachers. ESOL teachers receive a certificate for completion of the online test administrator training course prior to the administration of the ACCESS test. When hiring for an ESOL position, ESOL endorsed teachers are considered first. Additionally, teachers with the ESOL endorsement at all schools have the opportunity to participate in ongoing job-embedded professional learning as part of the school professional learning plan.

The Title III Coordinator leads a professional learning day for ESOL teachers, usually once per semester, or sometimes three times a year. ESOL teachers develop a plan for professional learning for their school staff and plan district initiatives for the ESOL program. New guidance from the GADOE is discussed and strategies/techniques of teachers are shared with the group. ESOL teachers have opportunities throughout the year to attend professional development associated with ESOL strategies and services.

Instructional Program

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

In March of each year, the Title III Coordinator reviews the number of ESOL students enrolled at each school and makes projections for the next school year. Based on those projections, determinations are made about any additional staff that will be needed to serve the EL students. Any additional staff needed will be requested by the Title III Coordinator to the Chief Financial Officer for consideration. The principal and ESOL teacher at each school work together to develop a schedule for the ESOL teacher. Certified ESOL teachers are located at all school sites. The number of teachers at each site depends on the number of ELs enrolled at the school who qualify for services. Delivery models used include push-in and resource language acquisition classes. The class schedule is entered into Infinite Campus and includes the delivery model for each class.

Elementary ESOL students participate in a balanced literacy approach, which provides both grade level and individualized instruction. Through the use of differentiation and flexible grouping, students participate in small group and/or individual tutoring services provided by the ESOL

teacher. ESOL students are served by an ESOL teacher in at least one content area instructional segment, preferably Language Arts.

ESOL teachers in middle school and high school serve students using a combination of the "push in" and "resource" models, utilizing a resource period segment to provide additional English language support. Middle and high schools students also participate in remedial English and/or mathematics courses if not meeting grade-level standards. High school ESOL students who need additional instruction will have the opportunity to participate in Scholastic's Read 180 or System 44 for reading support. All of these strategies are used to individualize learning plans for ESOL students.

Various materials are utilized in elementary, middle, and high school, depending on the needs of students. Remedial programs, such as Early Intervention Program (EIP) and Coordinated Early Intervening Services (CEIS) assist in addressing the deficits in ELA and math at an early age. PathBlazer is used in the elementary schools to address the deficits. STAR is used as a universal screener and an assessment tool for students 1st through 8th grade to determine growth in reading and math. STAR Reading is also used in grades 9-12 as a universal screener.

Multi-tiered systems of support is a framework used in all elementary and middle schools to provide support for all students, especially students requiring Tier II or Tier III academic and/or behavioral support. ESOL students receive various interventions and are progress monitored, as are all students in MTSS.

The instructional program for ELs primarily follows the curriculum at each educational level. ESOL and regular education teachers are expected to use strategies that will support achievement for ELs.

Evaluation

Evaluation of the ESOL program is based on EL's progress and proficiency in the English language as determined by the administration of the Assessing Comprehension and Communication in English State to State for English Language Learners (ACCESS). The standards-based, criterion-referenced test is used to assess the student's proficiency level in the areas of speaking, listening, reading, and writing. The test measures student gains, provides information to enhance instruction, and assists in evaluating the effectiveness of the ESOL Program, and informs students' further placement in the ESOL program.

Fiduciary Responsibilities

The Director of Federal Programs prepares the Title III budget, in collaboration with the ESOL teachers, and uploads into the consolidated application. The requisition process is the same for purchase orders funded by Title III as with Title I. The Director of Federal Programs approves all purchases. The Title III provision of “supplement, not supplant” prohibits supplanting of federal, as well as, state and local funds. Title III funds may be used for upgrading program objectives and effective instructional strategies, upgrading curricula, instructional materials, educational software, and assessment procedures, tutorials and academic or vocational education, intensified instruction, providing community participation programs, family literacy services, and parent outreach programs, improving English proficiency, access to, and participation in, electronic networks for materials, training, and communication. It is the responsibility of the Director of Federal Programs to ensure that all funds that are expended for Title III are allowable under Title III.

Parent, Family, and Community Engagement Activities

Wayne County supplements Title I required EL parent and community engagement activities by using Title III funds to provide parent workshops and EL engagement and outreach. An interpreter is contracted beyond the regular school day to provide outreach activities designed specifically for EL parents. The activities are planned at different times to help meet the needs of all parents of ELs. Materials from the Parent Institute are used for the workshops as well as community resources.

SECTION 16: TITLE IV, PART A—STUDENT SUPPORT AND ACADEMIC ENRICHMENT (SSAE)

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

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 (*ESEA* section 4101).

As the District Improvement Plan is developed, the SSAE grant is considered as programs/initiatives are planned to provide all students access. The Wayne County School System prioritizes funding

strategies and activities that are aligned to the unique and diverse needs of its students, informed by stakeholder input, and that will have the greatest impact on academic achievement and student outcomes.

SECTION 17: TITLE V, PART B—RURAL AND LOW-INCOME SCHOOLS 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 subgrants to eligible LEAs to support a range of authorized activities that support student achievement. An LEA may use RLIS funds for the following:

1. Teacher recruitment and retention, including the use of signing bonuses and other financial incentives.
2. Teacher professional development, including programs that train teachers to use technology to improve teaching and to train teachers of students with special needs.
3. Educational technology, including software and hardware that meets the requirements of Part D of Title II.
4. Parental involvement activities.
5. Activities authorized under the Safe and Drug-Free Schools and Communities State Grants program.
6. Activities authorized under Part A of Title I (Improving the Academic Achievement of the Disadvantaged).
7. Activities authorized under Title III (Language Instruction for Limited English Proficient and Immigrant Students).

The District Improvement Plan initiatives/action steps are considered as decisions are made for expenditures of the grant.

All districts that implemented Title V, Part B activities during the prior school year are required to complete the Annual Evaluation Report via the Consolidated Application. This includes districts that did not receive an allocation in prior year but that implemented activities using prior year carryover funds. The Title V, Part B program must first be added to the district's programs in the Consolidated Application. To access the Annual Evaluation Report, click on the Program Information tab, then the Data Collection tab.

The activities reported must match the activities reported on the Rural Education Initiative tab located under the Program Information Page submitted with the prior year approved budget or the most recently approved budget amendment if applicable.

SECTION 18: TITLE VIB, IDEA

The Director of Special Education, in collaboration with the Chief Financial Officer, prepares and uploads the consolidated application to the Georgia Department of Education (GaDOE) portal for the following grant funds: IDEA Flow Through; Federal Preschool, State Preschool, and High Cost. The Director of Special Education approves all purchases utilizing grant funds. Grant funds are utilized for teacher salaries, instructional supplies including equipment, and pupil support including materials. It is the responsibility of the Director of Special Education to ensure that funds are sufficient to serve students with disabilities and that all funds expended are allowable under IDEA. IDEA funds are used to “supplement and not supplant” federal, state, and local funds. By meeting the compliance standard of “*Maintenance of Effort*” (MOE), IDEA funds are supplementing Wayne County’s state and local expenditures. The Director of Special Education uploads the MOE eligibility worksheet annually to the GaDOE portal for approval of our local IDEA budget.

The Director of Special Education, in collaboration with the Chief Financial Officer, ensures that IDEA funds are used only to pay the “**Excess Cost**” of providing special education and related services for students with disabilities. Excess costs are those costs for the education of students with disabilities that are in excess of the average annual per student expenditure in Wayne County for the preceding school year.

The Director of Special Education communicates and collaborates with parentally placed private/home school students with disabilities in an effort to ascertain the equitable “*Proportionate Share*” of federal funds to be used to serve these students.

The Director of Special Education monitors the discipline, placement, and identification of Students with Disabilities (SWD) and utilizes 15% of “**Coordinated Early Intervention Services**” (CEIS) funds for intervention with high-risk regular education students if deemed disproportionate. If not deemed disproportionate, utilizing funding for this purpose is optional. CEIS funding is comprised of 15% of the total of both the IDEA and Preschool funds.

The Director of Special Education will complete applications annually to the GaDOE for reimbursement of a *“High Needs Child.”* IDEA 2004 requires the eligibility for reimbursement for a high needs student to be at least three times the average per pupil expenditure as defined in Section 9101 of the Elementary and Secondary Education Act of 1965. Expenditures to be reimbursed will be associated with needs identified in the student’s Individualized Education Plan. The Director of Special Education ensures that expenditures for reimbursement are allowable.