



# **Thomaston-Upson Federal Programs Procedural Manual**

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## **Purpose of Title I and This Handbook**

Title I, Part A is a multi-faceted federal entitlement program designed to “help all children have the opportunity to obtain a high-quality education and reach proficiency on challenging state and academic standards and assessments.” The purpose of Title I is to “enable schools to provide opportunities for at-risk and disadvantaged children to acquire the knowledge and skills contained in the challenging State content standards and to meet the challenging State performance standards developed for all children.” Title I is intended to serve students in core academic subject areas: English Language Arts, Math, Science and Social Studies. Title I is NOT for Foreign languages, Art, Music, Health and PE, Gifted and Talented, or any area other than the core subjects.

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

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

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# Title I Monitoring Process

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

The Georgia Department of Education requires that Thomaston-Upson Schools monitors the implementation of Title I programs and the expenditure of all funds associated with the program. The specific requirements are as follows:

- (a) LEA/Program Director will conduct self-monitoring of its schools and programs sufficient to ensure compliance with Title Program requirements, including Title I, Part A, Title I, Part C, Title I, Part D, Title II, Part A, Title III, Part A; Title VI, Part B; and Title X, Part C—McKinney-Vento Act.
- (b) Title I Director will undergo training from GaDOE and other sources to maintain proficiency in Title I program compliance requirements.
- (c) Title I Director will provide technical assistance to local schools.
- (d) Title I Director self-monitoring will include monitoring all program expenditures to verify that all program expenditures comply with Title I Program requirements.
- (e) Title I 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, Title I Director will complete the Self-Assessment Checklist and submit it to the Georgia Department of Education (GaDOE).
- (g) LEA will undergo monitoring by GaDOE on a four-year cycle. LEA/Program 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 Title programs. If a Corrective Action Plan is required, the LEA/Program Director will respond in a timely manner with a Corrective Action Plan, which must be approved by GaDOE. The appropriate Title Program Education Program Specialist will monitor implementation of the Corrective Action Plan.

Monitoring is an essential component of ensuring that all facets of the Title I program are being implemented as prescribed by No Child Left Behind under the Elementary and Secondary Act. It is a process of systematically providing technical assistance and collecting data in order to provide information that can guide program implementation.

Thomaston-Upson Schools Title I Program makes use of monitoring as a means of regular observation and recording of activities taking place in Title I schools. Critical to this process is the feedback provided to schools that can assist in improving student academic achievement. District monitoring addresses the following:

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

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

1. Monitoring of Expenditures – Local educational agencies (LEAs) must submit for approval an annual budget through the Consolidated Application process. Title I Education Program Specialists review each application and budget to ensure that expenditures are appropriate for the program area before approving LEA budgets. Once budgets are approved, Title I Education Program Specialists track how well LEAs are requesting funds for expenditures to ensure that LEAs are likely to meet the expenditure requirements for Title I funds.
2. Single Audit – LEAs with single audit findings are flagged for technical assistance.
3. On-site Monitoring – An SEA on-site Cross-Functional Monitoring Team visits a LEA to apply the criteria included in the *LEA Monitoring Form*.
4. Self-Monitoring Checklist – LEAs not receiving an on-site visit complete the Self-Assessment Checklist and submit it to the Georgia Department of Education (GaDOE).

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

- Selection of LEAs to be monitored.
- LEAs are monitored on a four-year cycle. Approximately one-fourth of the LEAs are monitored each year.
- LEAs were initially randomly selected from each of Georgia's thirteen service areas.
- LEAs with audit or monitoring findings requiring a return of monies, or receiving a high number of complaints from parents and other stakeholders are monitored within the year of the LEA audit or monitoring report and the written complaint. For example, if an LEA is audited in FY10 and the Division receives the report of findings in FY11 before the end of the monitoring cycle, the LEA would be included in the LEAs to receive an on-site monitoring visit. In addition, on-site monitoring outside of the scheduled cycle may be arranged as needed if an LEA evidences serious or chronic compliance problems.



Title I Education Program Specialists must follow the Division protocol when conducting an on-site monitoring of an LEA. A copy of all documentation is maintained with the SEA.

## **LEA Communication with and Monitoring of Title I Schools and Programs**

Monitoring of Title I schools is a critical component of ensuring that compliance is taking place at each school. During the summer prior to the beginning of the new school year and after the Annual Title I Conference in June, the district Title I Director convenes a meeting of all Title I principals during a summer orientation. Principals receive training on policies and procedures and guidance for operating a Title I program.

Principals are given detailed information on expectations and copies of program guidance. Specific training is provided in all facets of Title I. A principal's notebook is provided for each principal and discussed in detail by the Title I Director. This notebook includes information related to timelines, budget forms, inventory information, schoolwide implementation, Flexible Learning Plans (FLPs), parental involvement, fraud policy and other areas of Title I as appropriate. Monthly Principal, Administrative Council and Curriculum Advisory Council meetings are also held with Title I principals. Specific budget information is given out at these meetings. Phone calls and emails are a daily occurrence between Title I district staff and Title I school staff. The Title I Director notes corrections to plans for Principals and Leadership Teams. Once the corrections have been made, the corrected copy is submitted to the Title I Director.

In addition to meeting with principals, the Title I Director meets with the Title I Parental Involvement Coordinator at the beginning of each year. These meetings are an opportunity to discuss Title I in detail and also an opportunity to discuss content specific information with each of the above. All Title I services are supplemental. This process is monitored through on-going technical assistance, site visits, and through the budgeting process.

### **Onsite Monitoring Procedures**

All Title I schools are subjected to on-going monitoring by the Title I Director throughout the school year. The Title I Director will conduct on-site monitoring of all schools at least once per year to ensure compliance with Title I guidelines. Feedback will be provided to the principals via checklists and descriptive information (See Appendices A-D). In addition, emails, staff meetings, and phone conversations take place throughout the year as a means of providing on-going monitoring and communication with each Title I school.

### **Timeline for Monitoring of Title I Schools**

- June-July. Provide Summer Workshop for all Title 1 Schools following Title 1 state training in June to update principals on any new guidelines and to provide guidance for "new" Title 1 principals. Workshops will include the following topics: budgets, ordering, compliance,

parental involvement, schoolwide programs, monitoring, academic achievement, inventory, scheduling, ethics, fraud, and waste. Provide additional training as needed at the annual System Leadership Retreat.

- July-August- Using CCRPI information determine the schools that will need to offer FLP services and work with principals to create and mail required letters.
- August-September- Work with principals on annual revision of plans. The Title 1 Director, Parent Involvement Coordinator, and Curriculum Director will review plans and budgets to ensure that funds are being spent according to plans and that plans have all the necessary components.
- August – June – Monthly meetings with Principals. Additional training as needed.
- August – June - Inventory all items purchased by Title I.
- August – June – Title I Director monitors Homeless and N&D programs.
- On-going review of school improvement data and plans in conjunction with other central office staff
- February- Title I Director attends GCEL conference
- On-going -Budgets and purchase orders are reviewed monthly by the Title 1 Director to assist schools in spending funds as planned.
- March-April- Send the Annual Survey of Parent Involvement to parents to provide information as a means of gauging the effectiveness of parental involvement activities. Schools compile data at their site to determine needs for the following year. The Parental Involvement Coordinator compiles data to determine needs for the following year.
- On-going – The Title I Director provides technical assistance and meets regularly with principals.

## Schedules

Each school is monitored according to the timeline provided above.

## Data Review

Data is compiled, reviewed, and discussed during Administrative Council and Curriculum Advisory Council meetings and at Board of Education meetings. Schools meet and analyze data with the intent of improving instruction. Principals review data with their leadership teams to identify and address areas in need of improvement. All Title I schools have data notebooks or rooms that are used during the data analysis process. School leaders discuss this information with all staff to ensure they fully understand the data presented.

## Monitoring of Private Schools

Private schools are monitored by the Title I Director. Invitations for private schools to consult and participate in federal programs the following academic year are sent in the fall, usually October, via receipt delivery. A meeting is held to present information about the programs available to students in private schools. Currently, Thomaston-Upson Schools is not serving any private schools.

## Reporting and Corrective Action Process (Audit and Monitoring Findings)

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

## Technical Assistance

Technical Assistance is offered at all times through e-mail and phone communication as well as school visits to assist schools in analyzing data to identify priorities in instruction, professional learning, and effective budgeting. Prior to the school start, a principal's meeting is held that reviews the purpose of all federal programs, as well as expectations and procedures related to allowable use of funds. A second principal's meeting is held mid-Spring to remind principals of end of the year information and to provide preliminary information related to the upcoming budget year. The Title I Director maintains a file of all training conducted throughout the year. This notebook contains all staff training, handouts, meeting agendas, meeting notes, etc. Ongoing monitoring after training is conducted by the Title I Director to ensure compliance.

## Comprehensive LEA Improvement Plan (CLIP)

### CLIP Review Process

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 and identification of needs and in-turn budgeting for such needs with federal funds. Department Directors, school and system leaders, as well as community and parent stakeholders are involved in the revision process. Title I parents are sent information inviting them to participate via mail, email, telephone, newspaper, social media, flyers, website, and newsletters. 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, Administrative Council, and Curriculum Advisory Council meetings. Input is also sought from district leaders during the annual leadership retreat held in June. The Title I Director gathers all input and updates the Consolidated Action Plan. The plan is submitted to Superintendent for final approval.

## Comprehensive Needs Assessment

The Comprehensive Needs Assessment is conducted in the spring of each school year and reviewed during the Summer Leadership Retreat meeting prior to the beginning of the new school year. The Superintendent, all central office personnel, Principals, Assistant Principals, and other lead school staff

review data from all state-mandated assessments to include Georgia Milestones Assessment System, ACCESS for ELLs, Georgia Alternate Assessment, Georgia Kindergarten Inventory of Developing Skills, SAT, ACT, PSAT, and AP exams. Process, perception and demographic data, including Teacher and Leader Keys Effectiveness Systems reports; annual stakeholder surveys; demographic reports such as Student Record and FTE; and College and Career Ready Performance Index measures, are also part of the Comprehensive Needs Assessment. The District Parent Advisory Committee, which also includes community stakeholders, and central office administrators review the data/needs assessments and requirements of all federal programs on an annual basis. These needs assessments drive the action/implementation planning for the upcoming year. A comprehensive professional learning needs assessment is also collected by school and submitted to the central office to determine the professional learning needs throughout the School System.

Data from these needs assessments are used to complete the Comprehensive LEA Improvement Plan (CLIP) within the Consolidated Application. The CLIP descriptors, which address all federal program funding as well as the state professional learning allocation, define the academic needs of the district and the aligned strategies to meet these needs. Budgets are submitted following the approval of the CLIP by each assigned GaDOE program specialist. In keeping with state and federal guidelines, prior to submitting the federal program budgets, the Superintendent signs off on the Consolidated Application denoting agreement with each assurance and certifying the accuracy of the final fiscal reports/vouchers requesting payment contained in the application (2 CFR §200.415).

## **Parental Involvement**

### **Parent Involvement Policy Overview**

Thomaston-Upton Schools has an on-going commitment to our Title I parents. Parental involvement is defined as the participation of parents in regular, two-way, and meaningful communication involving student academic learning and other school activities. Our goal is to ensure that our Title I parents and their children receive extraordinary services and assistance that will lead to improved academic achievement. The district recognizes that parents are an integral part of a child's success in school, starting with the concept of being the child's first teacher. As a conduit for their children's success, the district will assist parents of all socioeconomic levels solidify their ongoing commitment to their child's success.

### **Parent Notification and Communication in an Understandable and Uniform Format**

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

## Parent Notifications

### **School Designation Status - Priority Schools**

Thomaston-Upton Schools does not have any schools designated as a Priority School at this time. In the future, if a school does have this designation, the following procedures will be followed.

A school identified as a Priority School will receive the support of the School Improvement Division of the GaDOE. This support will be through the assignment of a School Improvement Specialist who will work with the school on a regular basis and will bring in other staff to support identified areas for growth. The GaDOE School Improvement Specialists will provide support for schools needing comprehensive services. The LEA would sign a three-year Memorandum of Agreement with the GaDOE on behalf of Priority Schools. The Memorandum of Agreement will outline a set of non-negotiable actions and interventions required of each Priority School aligned with the turnaround principles. The MOA will be developed during the spring of the year before it is to be signed in the fall.

Using the U.S. Department of Education's (US ED) definition and methodology for identification, schools identified as Priority Schools will receive school improvement support and intervention for a period of three years. Schools will be exited from Priority School status when the school no longer meets the definition of a Priority School **and** demonstrates a 5 percentage point increase in Content Mastery category performance **or** has graduation rates (most recent year and prior year 4-year cohort rates)  $\geq 60\%$ .

### **School Designation Status - Focus Schools**

Thomaston-Upton Schools currently has one school, Upton-Lee High School, for 2015-2016 identified as a Focus School. The GaDOE will work in collaboration with the LEA to analyze student achievement data to identify the largest gaps between groups of students. Based on the analysis of data, the LEA and the GaDOE will determine the interventions required of each Focus School. LEAs will sign a Memorandum of Agreement with the GaDOE on behalf of Focus Schools. The MOA will outline a set of non-negotiable actions and interventions required of each Focus School.

Using the U.S. Department of Education's (US ED) definition and methodology for identification, schools identified as Focus Schools will receive school improvement support and intervention. Schools will be exited from Focus School status when the school no longer meets the definition of a Focus School and demonstrate a 2.5 point increase in the 3-year average of Achievement Gap scores. Schools that were identified as Focus schools in spring 2012 may exit Focus status if they no longer meet the definition of a Focus school and have increased their Achievement Gap points by 2.5 points or exceed the state level 3-year average of Achievement Gap Points.

### **ESEA Public School Choice**

Thomaston-Upton Schools is unable to offer school choice since there is only one school per grade span: K-3, 4-5, 6-8, and 9-12.

## **Flexible Learning Programs**

All Title I Priority and Focus Schools must offer a Flexible Learning Program (FLP). In addition, all Title I Priority and Focus Schools must develop a written plan that outlines how the Title I Priority and Focus Schools will implement a FLP program. GaDOE Title Programs Unit must approve the FLP plan prior to implementation. All Title I Priority Schools and Focus Schools are required to send notices to parents describing the school's status, to share data and information used to support programming decisions, and to explain how parents may become involved in improving the school. All Title I Priority Schools are required to set-aside 10 percent of their school's Title I allocation for professional learning. Focus Schools are not required to set-aside 10 percent of their school's Title I allocation for professional learning. However, Focus Schools may set-aside funds for professional learning if the need for professional learning is addressed in the school's Title I targeted assistance or schoolwide plan. LEAs are required to set-aside a minimum of 5 percent of the LEA's Title I allocation to implement the LEA's FLP program in Title I Priority and Focus Schools. Set-asides above the minimum 5 percent requirement may come from the LEA's total allocation or the Priority Schools and Focus Schools' allocation and are subject to the equitable services to eligible private school students' requirements (ESEA Section 9401(c)(5)).

## **Flexible Learning Program (FLP) Notification**

For any identified Priority and Focus Schools, two annual notifications are made to parents/guardians regarding the Flexible Learning Programs (FLP). These notifications are mailed to parents via the U.S. Postal Service with additional notification through newspaper articles and the website of the Thomaston-Upson School System.

## **Parents' Right to Know Teacher and Paraprofessional Qualifications**

Parents are informed of their rights to know the qualifications of their children's teacher and paraprofessionals (ESEA Sec. 1119(a)(1)). This information will be sent home to every parent in the beginning of the year in each student's agenda. 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 other newsletters sent home with students.

## **Highly Qualified Teachers Evidence**

At the beginning of each year and when preparing set-asides for the Consolidated Application, the Director of Federal Programs contacts the Director and Coordinator of Human Resources to obtain information regarding the status of highly qualified (HiQ) teachers. This information is then used to determine the professional learning set-aside amount to support high quality teachers. All teachers who are paid with Title I funds are required to meet HiQ status. The Director of Federal Programs sets aside funds to help teachers meet HiQ status, if necessary.

Parents are informed of their rights to know the qualifications of their children's teacher. This information is made available through the student handbook and district/school websites. If a student has been assigned to or has been taught for four or more consecutive weeks by a teacher of a core

academic subject who is not highly qualified, parents are provided information upon request. This is to support effective parent communication.

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.
- The baccalaureate degree of the teacher and any other graduate certification or degree held by the teacher and the field or discipline of the certification or degree.
- Whether the student is provided services by paraprofessionals.

Parent notification is not required for the following:

- For teachers who do not teach core academic subjects.
- For paraprofessionals who are not highly qualified.

## LEA Parental Involvement Policy

District and school parent involvement policies are reviewed and revised annually with parents and other stakeholders (teachers, principals, administrators, other school personnel, and community members). The district will hold a meeting for review of the district and school Parent Involvement Policies at the Central office. All Title I parents, teachers, administrators, and other school personnel in the district will be invited to the meeting to provide input. A notice will be put in the paper of the meeting dates. Parents and other stakeholders (community members) will be notified by invitation sent to each individual school. Meeting notices will be sent home from the school and posted on the district website. District parents that cannot attend the meeting will be given the opportunity to obtain a copy from Central Office and submit input before the final revisions are approved. The Parent Involvement Coordinator will be responsible for collecting the required information (agenda, meeting notes, and sign in sheets) and submitting to the Title I Director. The district will hold the meeting in the spring to revise plans for the next school year. The LEA Parent Involvement Policy checklist will be applied to district and school policies. Revision dates will be clearly marked on each policy. The Title I Director will review policies during on-site monitoring visits. Plans include activities/workshops that have been identified and requested through the previous year's annual parent involvement survey. School improvement and parent involvement policies are posted on the website, available at the school, and hard copies are either in the student handbook or beginning school packets at each school.

Each school in the Thomaston-Upson School System holds an annual open house. These meetings give parents the opportunity to review and provide feedback on system-wide student data, parent activities, district and school Parent Involvement Plans, Schoolwide Title I Plans, district and school Comprehensive Improvement Plans. Parents are notified about this opportunity through advertisements in local media,

school-level flyers, social media websites, the automated calling system, and the system website. The school district uses the comments provided by parents during the annual review/revision of documents at the annual System Leadership Retreat, parent workshops, and Parent Advisory Council. After the school system review/revision process, district and school Parent Involvement Policies are made available to parents on the district website and on Title I schools' websites. Copies are also available in the Parent Resource Center. Parents are also given the opportunity to provide feedback about Title I programs by completing annual parent surveys. These comments are used by the District and Title I schools when planning parenting programs.

## Distribution of Completed Plans

Several plans are shared with faculty, staff, students, parents and community members on the school district Federal Programs web site located at:

[http://www.upson.k12.ga.us/federal\\_programs](http://www.upson.k12.ga.us/federal_programs)

Plans include district and school improvement plans, parent involvement policies, Title I schoolwide plans, school compacts, flexible learning program plans, 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 agendas. An automated calling system and information in first day packets inform parents about the availability of these plans. Parental input into the content of each plan is solicited during multiple meetings throughout the school year but especially at the annual Title I meeting conducted each fall.

## School-Parent Compacts

All Title I schools are required to have parent compacts. 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 annual Parent Advisory Council meetings, school council meetings, and parent workshops. Revision dates will be clearly marked on each compact. An invitation will be sent home to all parents in the school and meeting dates will be given in school newsletters and through the school's web site. The Parent Involvement Coordinator (PIC) will be responsible for setting up meetings and collecting required information (agenda, meeting notes, and sign in sheets). Parent compacts will include responsibilities for the teacher, parent, and students. Compacts will be distributed to all parties involved for signatures in the fall of the year. Copies of the signed parent receipt of the compact are kept on file in each classroom at the school level. The Thomaston-Upson Board of Education believes that the public schools belong to the people who create them and that student educational goals should reflect the goals of the community. We affirm and assure the rights of parents to participate in the development of the goals and objectives of the public schools and encourage involvement in all areas of their children's educational experiences. The Title I Director and Parent Involvement Coordinator co-chair a Parental Involvement Committee that includes parent representation from every school.



## 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 Involvement Coordinator (PIC) to arrange meeting times and invite all stakeholders to the meeting. The (PIC) will be responsible for collecting and submitting documentation of the required Title I annual meeting, including a copy of the invitation to parents, sign in sheet, agenda, and minutes to the Title I Director. Many schools hold their Title I meetings in conjunction with open houses or PTO meetings. The Annual Title I Meetings are held before or after the open houses or PTO meetings. Meetings are also announced via paper copies to parents, web sites, call system, radio announcements, and marquees at each school as Title I Meetings.

## Annual Evaluation

*Process to Collect:* The annual survey is provided to schools after parent advisors have reviewed and made suggestions for improvement of the survey. The parent survey is conducted in the fall. In addition, an AdvancED survey is conducted every five years. Both surveys are conducted online. However, parents are informed of the availability of a paper survey if they so desire. Advertisement of the surveys and requests for completion occur through the newspaper, newsletters, web site, automated phone calls and radio announcements. The surveys are collected and compiled and the following year's parent involvement activities are built from the responses.

*Process to Review:* The results of the surveys are shared among several groups of stakeholders, including, but not limited to, parents, school and central office administration, Parent Involvement Coordinator, School councils/Title I advisors and those attending the annual Title I meeting. Stakeholders review the results of the surveys while reviewing and revising the schoolwide and parent involvement plans and components.

*Actions Taken by LEA to Improve the Quality and Effectiveness of Parent Involvement Policies and Practices:* Title I Director and Parent Involvement Coordinator review the annual spring survey as well as the results from the previous spring surveys. Additions/deletions/revisions are discussed and agreed upon during this meeting. Formatting and revisions are made after the meeting and then sent back to advisors for comment. If no further suggestions are made, the surveys are sent to schools to print and send to parents without being embedded in other materials.

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

## Capacity for Parent Involvement

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

The Parent Involvement Coordinator considers and plans based on the six requirements for building capacity by answering the following questions:

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

## Parent Information and Resource Center

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

## Required 1% Set Aside for Parental Involvement

Parental Involvement: Principals have the option of expending the 1% in Parent Involvement funds or submitting them back to the system level. Principals typically decide to direct those funds to a district level parent involvement activity/project by signing a District-wide Parent Activity Assurance form. The funds are used at the district level to fund a Parent Involvement Coordinator that serves all schools. Title I parent advisors participate in the discussion regarding this requirement during the system Title I meeting.

## **School Improvement Plans**

School Improvement Plans are updated and revised each spring for the following school year. Each school leadership team conducts a spring retreat at which representatives from each grade level, content area, and department, as well as administration and parents meet to develop a plan. School administrators then present the plan at the annual system leadership retreat as they work with other schools, system leaders, and parents to develop a system improvement plan. It is through this process that the LEA oversees the development of school improvement plans. System leaders also support schools in developing, revising, implementing and coordinating school improvement/schoolwide plans during monthly Administrative Council and Curriculum Advisory Council meetings. During the meetings, data is analyzed to identify and develop solutions to challenges related to instructional strategies, parent involvement, professional learning, and budgets. Additionally, system leaders attend monthly leadership team meetings at each school. During various meetings throughout the school year, parents are involved in the planning, revising, and implementing phases of the process. Parents are also sent information inviting them to participate in the revision process at an annual Parent Advisory Council meeting via mail, email, telephone, flyers, website, and newsletters. Once revisions are made, the plan is placed on the website. Hard copies are also available at the schools.

## **School Improvement (1003a) Interventions**

### **Monitoring of School Improvement**

All schools within the Thomaston-Upson School System conduct Schoolwide Programs. This allows all children and all parents an opportunity to have equal access to all related Title I assistance. The LEA will utilize district School Improvement Specialists to build capacity and support the school improvement process in all schools. All schools within an LEA will be involved in school improvement efforts through the work of the LEA, the RESA, and GaDOE. District School Improvement Specialists will work with schools to implement practices that have proven effective with improving schools. District School Improvement Specialists, along with the GaDOE, will establish clear expectations for personnel as they systemically support continuous improvement in all schools.

### **Review and Approval of School Improvement and Schoolwide Plans**

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

## Professional Development, Analyzing Data, Technical Support and Assistance

System leaders support schools in developing, revising, implementing and coordinating school improvement and schoolwide plans during monthly Administrative Council and Curriculum Advisory Council meetings. During the meetings, data is analyzed to identify and develop solutions to challenges related to instructional strategies, parent involvement, professional learning, and budgets.

## Monitoring of Use of Funds

The Federal Programs Director will meet with each school monthly to review and provide recommendations for budgeting decisions.

## School Improvement 1003(g)(SIG)

The Thomaston-Upson School System does not currently have any participating schools in this grant.

## ESEA Public School Choice

Thomaston-Upson Schools is unable to offer school choice since there is only one school per grade span: K-3, 4-5, 6-8, and 9-12.

## Georgia's ESEA Flexibility Waiver and Flexible Learning Program (FLP)

Georgia's LEAs with schools identified with a Priority or Focus designation are required to offer a Flexible Learning Program (FLP). Flexible Learning Programs (FLP) will initially be funded through a minimum five (5) percent set-aside requirement for any Title I Priority or Focus school. Additional Title I, Part A funds may be set-aside to ensure that a viable FLP program is implemented with fidelity.

## Enrollment

While students in Priority Schools and Focus Schools are eligible to receive FLP services based on low-income status and their individual student scores on state assessments, LEAs must prioritize Title I FLP funding and services to the students in Priority Schools and Focus Schools base on the following federal rank order:

- First- Students in the following subgroups that are not meeting standards as identified by state assessment results: Students with disabilities, English Learners, or direct certification subgroups since we are a Community Eligibility Provision (CEP) district; and, if funding levels allow
- Second- All other students that are not meeting standards, as identified by state assessment results; and, if funding levels allow;
- Third – Students who are meeting standards, as identified by state assessment results.

The Thomaston-Upton School System will send packets of information to students to enroll in a Flexible Learning Program based on three tiers. Tier I students, students in the following subgroups that are not meeting standards as identified by state assessment results: Students with disabilities, English Learners, or direct certification subgroups since we are a Community Eligibility Provision (CEP) district; will be served first. If funds are still available after Tier I students have enrolled, invitations will be extended to Tier II students including students that are not meeting standards, as identified by state assessment results. Tier III students, students who are meeting standards, as identified by state assessment result next if funds still exist. The initial enrollment will occur in accordance with DOE requirements and dates including an enrollment period in August and January.

## Notification to Parents of Workshop and Eligibility for Services

All parents will be encouraged to participate in the development of a Flexible Learning Program for any schools designated as Priority or Focus Schools. Parents will be invited using multiple means of communication including radio advertisements, newspaper articles, flyers sent home with students, automated phone calls, and web site announcements. In addition, notification will be sent via U.S. mail to parents informing them of their child's eligibility to participate.

## Description of Services

For each Title I Focus or Priority school the LEA must submit an FLP plan that addresses the following:

- Using school level disaggregated data, what are the areas of weakness (content area(s), subgroup(s), and graduation rate(s) if applicable) that will be addressed by the FLP offered at this school?
- How will the LEA implement an FLP plan that will ensure supplemental academic instructional time that is designed to support the students meeting identified goals and outcomes?
- How will the LEA provide professional learning (PL) for the FLP staff/contractor so instruction is engaging, enriching and tailored to meeting the needs of the students and is not a regurgitation of the teaching methods utilized with the students during regular instructional time?
- How will the LEA ensure that the instructional goals of the FLP students are aligned with Common Core Georgia Performance Standards?
- How will the LEA maximize the enrollment of the students in FLP?
- How will the LEA maximize the attendance of participating students in the FLP?
- How will the LEA monitor the implementation of the program and the tracking of all the required data?

## Submission of the FLP Plan

As part of the Consolidated Application, districts will need to submit:

- A list of Title I schools that are required to offer a Flexible Learning Program (FLP), their classification as to Priority or Focus by school and LEA, and the school's Title I status.
- An LEA will project how much the LEA is intending to budget on their Flexible Learning Program (FLP) in the following areas:

- Administrative Personnel Costs
- Supplemental Materials / Supplies - LEA office and / or School
- Evaluation Costs
- Transportation Costs of FLP Program
- Instructor Costs – Current Teachers or Contract Instructors
- Professional Learning Costs
- Equitable Services for Eligible Private School Students, where applicable
- Total Cost of the Public School Choice transportation (parent reimbursement and / or school buses), if applicable
- Required set-asides
- Other (as approved by the LEAs GaDOE Flexible Learning Program Specialist)

## Budgets

Title I Part A is a federally funded program under the Elementary and Secondary Education Act of 1965 (ESEA). This Act provides federal funds through the Georgia Department of Education (GaDOE) to local education agencies (LEAs) and public schools with high percentages of poor children to help ensure that all children meet challenging State academic content and student academic achievement standards.

- LEA's must submit, through the Consolidated Application, the Title I, Part A Flexible Learning Program (FLP) budget as a part of the LEA's Title I, Part A budget. The descriptions of all budgeted items must be specific and clearly describe the intent of the expenditure.
- All items budgeted must meet the allocable, allowable, reasonable, and necessary tests described in the OMB Circulars.
- Are the expenditures allowable Title I expenditures?
- Do the expenditures appear to be necessary in light of the LEAs goals and objectives?
- Are the costs of the expenditures reasonable?
- Are the expenditures for core subject areas?
- LEAs will utilize general guidelines for the use of Title I funds and equipment when submitting a budget for the FLP program. The law provides many flexibilities and opportunities for local educational agencies (LEAs) and schools to meet the purposes of Title I. In schoolwide programs, and LEA may use Title I funds for any activities that are part of the schoolwide program plan. Remember that Priority and Focus Schools may become schoolwide programs with less than a 40 percent poverty level. However, all schoolwide programs must have an approvable schoolwide plan. In targeted assistance schools, however, Title I funds may only be used to meet the needs of participating children, their teachers, and their parents.

- The Elementary and Secondary Education Act of 1965 (ESEA) provides several fiscal requirements that are applicable to Title I, Part A funds. Local educational agencies (LEAs) must maintain the financial effort previously provided with State and local funds to Title I schools. LEAs must provide services to Title I schools that are comparable to those of non-Title I school.
- A local educational agency (LEA) may use Title I funds only to supplement and, to the extent practical, increase the level of funds that would, in the absence of Title I funds, be made available from non-federal sources for the education of students participating in Title I programs. In no case may Title I funds be used to supplant (i.e. take the place of) state or local funds. It is a violation of the supplement, not supplant requirement if an LEA distributes regular state and local funds in a way that discriminates against students in a Title I school. LEAs found to be in violation of the supplement not supplant requirements in the Elementary and Secondary Education Act of 1965 (ESEA) will be required to return all Title I funds used to supplant the LEA's Title I budget. It is important to remember, however, that any determination about supplanting is very case specific; this makes it difficult to provide general guidelines without examining the details of the situation. Because Title I funds are available, the Georgia Department of Education (GaDOE) uses a set of presumptions of what the LEA would have provided in the absence of the Title I funds based on its behavior in other situations. These presumptions are outlined in Office of Management and Budget (OMB) Circular A-133 Compliance.

Prior to review of any budget submitted for approval, the Title I Education Program Specialist reviews the plans for the LEA's FLP submitted through the Consolidated Application Tab for FLPs. The FLP Plan contains ten questions which the LEA must respond to detailing the LEAs program for those LEAs with Priority and Focus Title I schools that are required to set-aside a minimum of five (5) percent of their Title I, Part A allocation for flexible learning academic interventions and supports.

## Required Set Aside

Flexible Learning Programs (FLP) are initially funded through a minimum of five (5) percent set-aside requirement of Title I for all Priority and Focus School status. This minimum five (5) percent set-aside must be a LEA set-aside.

LEAs may set-aside additional funds above the required minimum 5 percent to implement interventions (i.e., FLP) in its Priority and Focus. This set-aside would be a custom set-aside in a LEA's Consolidated Application that would clearly explain the intervention and list the Priority and Focus schools to which applies. This set-aside would not be subject to the requirement to provide equitable services to eligible private school children, their teachers, and their families because public Title I school students, as a whole, do not benefit from those services either.

## Timeline

August – Mail letters home inviting eligible students and Develop list of eligible students based on federal tier guidelines. Begin serving students using the Flexible Learning Program.

Monthly – Evaluate the Flexible Learning Program.

January – Conduct a second enrollment.

April – Conclude program and complete evaluation.

## Complaint Procedures

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

## Monitoring and Evaluation

The LEA must submit the following components of an evaluation plan within its FLP plan in the Consolidated Application for *each* Priority and Focus School Served:

- Effectiveness target or overall quantified goal of the program
- Assessment instrument(s) used to measure this target / goal
- Timeline for assessments (rough timelines for administration of pre-test, post-test, etc.)
- LEAs must submit their evaluation plan as a part of their FLP plan.

The Director of Federal Programs and the GaDOE will monitor program data and evaluate performance according to the overall goal as stated in Title I, Part A legislation – increasing academic achievement on state assessments and attaining proficiency in meeting state standards. The evaluation will qualify core program components in an effort to highlight factors that contribute to effectiveness.

Each FLP will be evaluated on the following dimensions:

- Participant Feedback
  - Evaluation Question: What was the overall experience of stakeholders with program?
  - Data Source: Stakeholder surveys
- Service Delivery
  - Evaluation Question: Is the LEA and its FLP program in compliance with laws and regulations?
  - Data Sources: Annual monitoring data, Program documentation, Federal reporting, Public reporting, Technical Assistance, etc.
- Effectiveness



- Evaluation Question: Are programs contributing to increased student academic achievement and performance on state education standards?
- Data Sources: Student performance on state tests, Pre-Post assessment measures of state standards and academic skills targeting by programs, Performance Flag data, and student growth in schools offering FLP.
- Evaluation results will be shared with stakeholders and the public and used to inform ongoing program improvement.

In addition, the Director of Federal Programs will make 2 unannounced visits during the FLP per enrollment period to ensure integrity of the program. Finally, the Director of Federal Programs will communicate regularly with the FLP Coordinator and Principal at the Focus School to identify and solve challenges in a timely manner.

## Transportation

Transportation will be provided to students as described in the FLP plan.

## Professional Learning

Professional learning will be provided to staff delivering the FLP to ensure appropriate instructional strategies are implemented to ensure the success of the students being served. Documents to be maintained: sign-in sheets, agendas, and description of professional learning.

## Schoolwide Programs

All schools within the Thomaston-Upson 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 Improvement Plans/Schoolwide Plans are updated and verified at each school's annual leadership retreat after receiving feedback at Annual Title I Parent Meetings. Parents are also invited to a system level Spring Parent Advisory Council meeting. All schools will notify stakeholders in multiple ways. Notice of the meeting dates will be placed on each school's marquee, in each school newsletter, on the web site, parents and other stakeholders will be notified by invitation sent from each individual school and all stakeholders will be notified using the automated phone messaging system. Parents that cannot attend the meeting will be given the opportunity to obtain a copy from each school and submit input before the final revisions are approved. Revision dates will be clearly marked on each plan. The Parent Involvement Coordinator (PIC) will be responsible for collecting the required information (agenda, meeting notes, and sign in sheets). At these meetings, parents and other stakeholders are given an opportunity to provide input on the Continuous Improvement Plan/Schoolwide Title I Plan, Parent/Student/Teacher Compacts, Parent Involvement Plans, Flexible Learning Programs, and the Comprehensive LEA Improvement Plan.

## LEA Guidance

Technical assistance and support to schools is provided in the areas of the annual needs assessment, comprehensive planning, implementation, and ongoing evaluation of each improvement plan. On-site meetings are held with principals to discuss the current status of their plans in regard to improvement components. Items missing or in need of revision are marked on the plan and then rechecked when the revised plan is submitted. The system will also include parents in its annual School Leadership Retreat. Copies of agendas and sign-in sheets from such meetings should be collected and stored in a Title I notebook as evidence and documentation of meetings. As previously stated, system leaders support schools in developing, revising, implementing and coordinating school improvement/schoolwide plans during monthly Administrative Council and Curriculum Advisory Council meetings. During the meetings, data is analyzed to identify and develop solutions to challenges related to instructional strategies, parent involvement, professional learning, and budgets.

## Development of New Schoolwide Programs

All schools within the school system have schoolwide programs.

## Schoolwide Program Plan Development

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

## Plan Consolidation

The Thomaston-Upson School System does utilize the consolidated Schoolwide and School Improvement plan template provided by the GaDOE.

## Consolidation of Funds

Thomaston-Upson Schools does not consolidate federal funds.

## **Target Assistance Programs**

The Thomaston-Upson School System does not have any target assistance programs.

## **Accountability**

## Audits and Cross Functional Monitoring Findings

The Thomaston-Upson School System undergoes regular audits as scheduled by the Georgia Department of Audits. Correction action plans are created to correct any findings received. The school system will maintain the appropriate documentation to indicate that correction actions have been completed and any findings have been cleared.

Steps to Audit/ Monitoring Resolutions:

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

## Fiduciary Responsibility

### 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 Title I Director will pull the MOE information from the Consolidated Application each school year for documentation purposes.

## Attendance Area Determination

The Thomaston-Upson School System only has one school per grade band: K-3, 4-5, 6-8, and 9-12. Therefore, attendance area determination is not needed to establish rank order.

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

Eligible Attendance Areas: The GaDOE Eligible Attendance Area Worksheet is used to calculate the previous year’s enrollment (from the October FTE Count), pre-kindergarten information, and free or

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

## **Allocations and Carryover**

### **Allocations**

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

### **Carryover**

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

Monthly budget sheets are monitored regularly throughout the year and calculations are made from these near the end of the school year to determine that no more than 15% will be carried into the following year. Title I Director tracks the spending of each program/school through the year via budget sheets. At the end of the school year, carryover information is updated and reviewed. Parent involvement, Flexible Learning Program (FLP), and professional development for Focus, and Priority schools are taken into consideration.

## **Reservation of Funds**

Flexible Learning Programs (FLP): Thomaston-Upson Schools sets aside 5% for FLP. Thomaston-Upson Schools has one Focus School.

*Professional Development:* One Title I school in Thomaston-Upson School System is designated as a Focus School. The Georgia's Flexibility Waiver no longer requires 10% set aside for professional learning.

In order to promote continuous school improvement, Thomaston-Upson Schools will continue to pursue professional development to strengthen best practices in all classrooms.

*Homeless Children and Youth:* Title I schools are required to set aside funds within their budgets to meet the needs of homeless children and youth. The Title I Director, who is also the Homeless Liaison, annually determines the amount of funds needed to adequately meet the needs of homeless students. The Title I Director 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 Title I Director is consulted if any staff member suspects that a student qualifies for homeless services. The Title I Director or designee then investigates the situation and makes the ultimate determination on whether or not students qualify. When a student does qualify, notes related to the situation are maintained, and a memo/email is sent to the Student Information Coordinator and the Director of 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. Currently, there are two residential facilities for neglected children, The Rock Ranch and Winshape Homes. The Annual Survey of Local Institutions for Neglected and Delinquent Children is completed each year and is based on the number of children residing at the home for 30 consecutive days with at least one day being in October.

*Private Schools:* Thomaston-Upson Schools currently has no Private Schools that have chosen to participate in the Title I program. If Thomaston-Upson Schools ever has any Private School 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, FLP, Private Schools, indirect cost, and Neglected and Delinquent.

## **Expenditure of Funds**

Upon receiving allocations, each school will use a spreadsheet entitled for the budget and narrative to develop a budget for the use of federal funds and share it with the Director of Federal Programs. Upon completion of the budgeting approval process with school and system title funds, the budget will be entered into the consolidated application system. Once approved at the state level, the Director of Finance will then enter the budget into the financial system software. The Director of Finance will review the budget entered into the financial system against the consolidated application for accuracy and allowable use of funds. Any discrepancies between the entered budget in the local system and the

consolidated application must be corrected prior to spending and draw-down of funds related to spending.

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

## Payroll

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

## Reasonable and Necessary Use of Funds

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

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

## Allowable and Unallowable Costs

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

Title funds cannot be used to purchase incentives for students, teachers, or participation in professional learning activities. Food for parent involvement must be considered “light refreshment”. “Light refreshments” has been defined as donuts, fruit, muffins, juice, coffee, chips, pretzels, popcorn, raw vegetables and dip, nuts, cookies, brownies, punch, soda, and water. “Light refreshments” does not

include pizza, sandwiches, or anything that could be considered any part of a meal. Title funds can only be expended for those events that “build capacity.” This means you can fund a snack for a *workshop teaching parents a specific skill*, but could not give snacks to parents volunteering.

The Title I Director will prepare a written report of preliminary Title I budget once this information becomes available from GaDOE. The report is submitted to the superintendent, and the superintendent’s leadership team. The Title I Director presents this information to the Board for approval. The Title I Director will present all approved Consolidated Application budgets for all federal programs to the Board once the GaDOE approves them. Copies of the meeting agenda, minutes, PowerPoint presentation and approval will be maintained in the Title I office.

The local Board must adopt all federal grant budgets and the CLIP after GaDOE approves the final submitted budget application. Additionally, any significant amendments must be adopted by the BOE. Each federal program must be identified and budget details must be listed.

## Budget Approval Process

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

Finance Department works with the Federal Program Director:

- Federal Program Director prepares the budget showing the distributions for district, per school and /or per program/function/object code. The Federal Program Director ensure that all funds budgeted are allowable per funding source.
- The budget is forwarded to the Finance Director. The Finance Director and/or designee enter the budgets into CSI after the DOE’s approval. The Consolidated Application Budget is used as the source for entering into CSI.
- The Finance Director and/or designee emails or prints the CSI Summary Report and Detail Report as requested and presents to the Director of Federal Programs.
- Director of Federal Programs and /or designee calculates current expenditures per school/facility using the Summary Report. If discrepancies are found, a Detail Report is requested. The Director of Federal Programs meets with Finance to correct any discrepancies.

- The Finance Director and or designee files a disbursement that is processed through GAORS website.
- The Director of Federal Programs receives a DE0147 paper form and a CSI report to verify the funds being requested in the drawdown. The Director of Federal Programs signs off on the DE0147 on paper form and keeps a copy of the DE0147 for his/her records.
- The Director of Finance signs off on the DOE's DE0147 form thereby requisitioning funds on the GAORS system.
- Once the requisition is processed, the Grant Payment Advice is compared to the electronic bank transactions to ensure that all funds have been received.
- The funds are recorded on the financial records to the proper fund and program as specified on the Grant Payment Advice.

*Requesting products through a Purchase Requisition/Order:*

- Purchase requisitions are completed by trained, designated employees using SoftDocs.
- Purchase requisitions are then sent to the school bookkeeper who forwards to the principal for review and approval.
- The principal approves and forwards the purchase requisition to the Director of Federal Programs for review.
- The Director of Federal Programs approves or disapproves based upon balance of object code and the federal program rules. The Director of Federal Programs forwards the purchase requisition to the Director of Finance for review who forwards to the Superintendent for final review and approval if the requisition is over \$500.
- The approved purchase order is then forwarded to the Purchasing Clerk.
- The Purchasing Clerk processes the requisition and assigns to it a P.O. number.
- The Purchasing Clerk then faxes or mails the P.O. to the company requesting the products to be purchased.

*Receipt of Invoice:*

- The Purchasing Clerk compares vendor invoices to purchase orders. If these items match, an AP form is created in SoftDocs. If not, the Purchasing Clerk alerts the Director of Finance and the Director of Federal Programs. They work together to determine a solution.
- The created AP form and a copy of the invoice is forwarded by the Purchasing Clerk to the bookkeeper at each perspective school to confirm product has been received.
- The bookkeeper completes the AP forms and forwards to the Director of Finance for review. The Director of Finance Clerk ensures the accuracy of the documentation prior to the releasing of funds to the vendor by the Accounts Payable Clerk.

*Payment of Invoice:*

- The Accounts Payable Clerk charges the expenditures to the proper fund/program in CSI.
- If invoices received that are charged to a Federal Program exceed the amount of purchase orders, the Accounts Payable Clerk alerts the Director of Finance and the Director of Federal Programs. They work together to determine a solution.
- Disbursement is not made until the invoice is validated as owned by the District.
- Open purchase orders at year end are reviewed by the Purchasing Clerk, the Director of Federal Programs and/or designees, school bookkeepers, and the Director of Finance to determine if goods or services have in fact been received but not invoiced by the vendor. Contact is made with the vendor to secure an invoice if such instances are noted.



## Periodic Certification

Fully-funded federal personnel must submit an assurance (Periodic Certification Form) twice yearly documenting that they spent 100% of their time on federal program-related activities (2 CFR §200.430(i)(1)(i, vii)). Principals are provided a hard copy of the periodic certification forms as well as the dates each of the two copies per federal personnel are due to the Director of Federal Programs. Periodic certifications for all Title I paid staff takes place after-the-fact. The process takes place twice yearly (January and May). The forms are signed and kept on file in the Title I office.

## Split-Funded Personnel

There are no split-funded personnel paid with Title I funds in the Thomaston-Upson School System. If split-funded positions exist in the future, split-funded personnel will be required to maintain time logs.

## Capital Expense Funds

The Thomaston-Upson School System does not use Title funds to budget items under object code 700 (capital expense).

## Consultants, Contracts, Purchased Services for Title I Funds

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

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

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

## Travel Expenses

All travel reimbursements are made according to state travel regulations. See Appendix B.

## Internal Controls

Internal controls are updated annually by the Director of Federal Programs, Director of Special Education, and Director of Finance. The Director of Federal Programs maintains the Internal Controls

procedures. Title I purchasing follows, at minimum, all Thomaston-Upson School System purchasing procedures.

*Segregation of Duties:* Duties are segregated within the fiscal management of the school system. As part of this segregation of duties, multiple signatures are required to process any requests for payment or purchase requisitions. Requisitions are initiated at the school or departmental level, approved by the Program Director, and forwarded to the Finance Department for a check of the account numbers and review by the Director of Finance. They are then forwarded to the Superintendent for approval. Once approved, the Purchasing Clerk faxes or mails the purchase orders to the vendors. For purchases from district set-asides, the same process is followed. Once items are received, an AP form is created in Softdocs by the Purchasing Clerk along with the source documentation for audit/monitoring. Contracted vendors are paid through the Accounts Payable Clerk after an invoice or time sheet has been approved by the Program Director, a completed AP Request for Payment form reviewed and approved by the appropriate personnel has been processed, and a pre-approved contract signed by the Program Director, and Superintendent is submitted (2 CFR §200.303(a)).

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

*Allowability of Costs / Appropriate Authorizations to Ensure Compliance:* Any purchases made with Title funds must follow the guidelines for allowable costs. The Thomaston-Upson School System Title Programs will follow guidelines as detailed in EDGAR, OMB Circulars (such as A- 87), 2 CFR Part 200, and the Title I LEA Handbook for Georgia. Title I purchases will also adhere to any memos, letters, and/or communication regarding allowable/unallowable purchases. The Title I Director will forward any questionable expense to the GaDOE Area Program Specialist for further clarification prior to granting approval for the expenditure. All federally funded activities must follow the process below to ensure that the Program Director, who has firsthand knowledge of federal and state program implementation requirements, examines each request for allowability (2 CFR §200.302(b)(7), 2 CFR §200.403, 2 CFR §200.432, 2 CFR §200.421, 200.454(a-b), 2 CFR §200.94, 2 CFR §200.453). As part of ongoing technical assistance, the Title I Director provides training and guidance through emails, meetings, and phone calls with school Principals on allowability principles, including the requirement that all expenditures must be aligned with needs identified in the School-wide Plan and the program's purposes for improving the achievement of the school's lowest-performing pupils. Training is documented through sign-in sheets. Principals develop, with their leadership teams, CIP/School-wide Plans, which are reviewed by the Title I Director as a component of the district's monitoring of its schools. Additionally, once developed, the Title I Director reviews the school-level budgets to ensure all items were included in the CLIP and CIP/School-wide Plans.

- 1) The Principal submits the requisition to the Director of Federal Programs.

- 2) The Director of Federal Programs reviews the expenditure for allowability, reasonableness, necessity, allocability, adherence with period of performance, avoidance of conflict of interest, and compliance with cost principles and system procurement methods. After double-checking the account number with the approved school budget and the descriptions within the approved budget on the Consolidated Application, the Director of Federal Programs signs the requisition.
- 3) The Director of Federal Programs forwards the requisition to the Director of Finance for review.
- 4) The Director of Finance then forwards the requisition to the Superintendent for the final review and signature.
- 5) If an expenditure is to be approved for school-level budgets, the Superintendent send the requisition to the Purchasing Clerk for processing and placing of the order with the vendor. back to the school.
- 6) All receipts are returned to the Purchasing Clerk for back-up documentation. Equipment and purchases with a shelf-life of longer than one year are logged on the school inventories as required under system inventory procedures.

The district does not make capital expenditures (object code 700) with Title I funds. If this should ever occur, approval via email must be obtained from the GaDOE.

*Supporting Source Documentation:* Appropriate source documentation for time and effort, travel, equipment, and other purchases is maintained at the central office. Included are the following:

- Time and Effort: Fixed schedules, Monthly Attestations, Personnel Activity Reports, sign-in sheets, agendas, Semi-Annual Periodic Certifications, split-funded time logs, memoranda for approval of payment
- Travel: Travel and Leave Requests, conference agendas, receipts, Travel Expenditure Reports
- Equipment: Requisitions, Requests for Pre-Approval of Federal Purchases, invoices, packing slips, receipts
- Contracted Services: Service contracts, time sheets, requests for payment, sign-in sheets from trainings, agendas from trainings
- Software: Requisitions, Requests for Pre-Approval of Federal Purchases, invoices/receipts

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

*Program Accounting and Reconciliation:* Program expenditures are monitored monthly, with the submission of Attestations for Federally Funded Paraprofessionals and Teachers as well as Personnel Activity Reports and split-funded time logs. These time and effort reports are signed by the Principal as the employee's supervisor and then forwarded to the Program Director for approval and maintenance.

Likewise, monthly drawdown reports are scrutinized, with time and effort and purchasing documentation checked against expenditures recorded in the electronic accounting system. If discrepancies are discovered, the program manager investigates and resolves the issue with the Director of Finance. At the conclusion of the sub-grant's period of performance, the Director of Finance and the Program Director review the Program Completion Report for submission to the GaDOE (2 CFR §200.302(b)(5)).

*Cash Management / Periodic Drawdown of Funds:* The Thomaston-Upson School System requests monthly drawdowns of federal funds based on actual rather than anticipated expenditures; thus, a reimbursement method is applied and advance payments are not requested. The Director of Finance prepares the draw down report to include payroll expenditures, contracted services, and other purchases. The Program Director reviews the report, notes in writing any revisions needed, and returns the signed report to the Director of Finance for correction. Once any discrepancies are resolved, the Director of Finance requests the drawdown electronically from the Georgia Department of Education (2 CFR §200.302(b)(6) and 2 CFR §200.305) and, when approved by the GaDOE, funds are electronically transferred to the system's designated bank account.

*Travel:* All federal programs follow the Thomaston-Upson School System's written procedures, available to employees on the district website, related to travel. All Travel and Leave Requests, including lodging requests, meals, mileage, and other anticipated expenses, must have the written prior approval of the employee's immediate supervisor, the Program Director (who is responsible for checking allowability of the participant and activity, (ESEA Sec. 2123(a), 2 CFR 2 CFR §200.404(a)), the Assistant Superintendent and Director of Curriculum and Instruction, and the Superintendent. Upon return, the employee must submit the Travel Expense Form and all required documentation such as dated hotel receipts and conference agendas. The employee's immediate supervisor, the Program Director, the Assistant Superintendent and Director of Curriculum and Instruction, and the Superintendent must approve the request for reimbursement for any travel-related expenses, which must not exceed the Travel and Leave Request total without written explanation from the employee and pre-authorization of the Program Director. Once approved, the Accounts Payable Clerk processes a check for reimbursement to the employee upon final review by the Finance Director (2 CFR §200.474(b)).

*Procurement:* To ensure open competition, the district uses the following procedures for procuring equipment, supplies, and contracted services (2 CFR §200.319(c) and 2 CFR §200.320(d)(3)):

- Sole source vendors are those individuals or companies that possess specialized knowledge, skills, or products for which there is no comparable measure. Included are contracted tutors and teacher mentors who have specific skills related to academic deficits or prioritized Title II-A needs identified through a school's Comprehensive Needs Assessment or targeted within School-wide Plan. Contracted tutors must hold or must have held valid Georgia teaching certificates in the content area or grade level for which the service is to be provided; be knowledgeable of best pedagogical practices in mathematics, English language arts, science, or social studies; possess the ability to manage the classroom environment; and be able to communicate effectively with school staff and parents. Contracted mentors

must hold or must have held valid Georgia teaching certificates; must have previous experience as a mentor teacher; and must be knowledgeable in coaching techniques to support new and struggling teachers.

- For micropurchases of goods and services up to \$3,500 (individually or in aggregate) where there is no sole source vendor, the Director has discretion to recommend the purchase without soliciting additional quotations or Internet searches;
- For goods and services between \$3,501 and \$99,999 (individually or in aggregate) where there is no sole source vendor, at least three written quotations solicited or at least three Internet searches for comparable products conducted prior to approval of the purchase;
- For goods and services in excess of \$100,000 (individually or in aggregate), the sealed bid process outlined by system procedures will be used;
- In accordance with 2 CFR §200.320, competitive proposals are required for goods and services in excess of \$150,000.

#### *Procedures for Sealed Bids/Competitive Proposals*

- An invitation to bid/Request for Proposal (RFP) will be placed on the system website and in the county's legal organ.
- The invitation to bid/Request for Proposal (RFP) will include a description (characteristics and specifications) of the goods or services to be provided, requirement the offeror must fulfill; factors to be used in evaluating the bid or proposal; date and time of the public bid openings.
- As bids are received by the designated system representative, they will be dated and stamped.
- At the appointed time, bids will be publicly unsealed and the results recorded by the designated system representative.
- The system representatives, including the Comptroller and Program Director, will evaluate all bids/Requests for Proposal (RFP) received by the designated due date. For sealed bids, the evaluation will be comprised of a price analysis comparing the values of similar products, goods, and services in order to determine the reasonableness of the bids. For competitive proposals, all submissions will be evaluated using a rubric provided to vendors as part of the RFP package.
- After a price analysis, the Program Director will submit to the Superintendent for Board of Education approval the recommended bid/proposal.
- Following board approval, a letter summarizing the results will be sent to all offerors.
- A firm fixed price contract award will be made in writing to the lowest responsive and responsible bidder.
- The system's vendor contracts for federal funds will contain the applicable provisions described in Appendix II to Part 200—Contract Provisions for non-Federal Entity Contracts Under Federal Awards.
- Vendors who wish to protest the results of the process must do so in writing using the procedures outlined in the bid or RFP package.
- These procedures do not apply to short-term contracted services such as professional consultants, retirees, or current employees or to situations in which a sole source vendor is the most viable option.

### *Consultants, Contracts, Purchased Services for Title I Funds*

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

- Contracts are generated by Title I Director. They also must be signed by the Superintendent.
- Specific duties are specifically spelled out for each contract. The contract includes the number of hours to work, the rate of pay, and timeline for payment.
- The person must also submit to a criminal background check and sign the mandatory reporting acknowledgment if he/she is working with students. A copy of the vendor's driver's license or other photo ID must be provided with the initial contract.
- If contracted vendor is serving as a tutor or mentor, Principals must submit an AP Request for Payment form to the Director of Federal Programs for review and approval prior to payment being made. Each contract is signed by the following: Contractor, Superintendent, and Title I Director.

*Contract Administration:* The Program Director will maintain oversight of contracted vendors. Source documentation such as time sheets, sign-in sheets, agendas, invoices, or evidence of satisfactory completion of the terms of the contract must be verified and signed by the Program Director prior to the payment for goods or services. Artifacts, daily sign in sheets, and completion records of all workshops are kept on file in the Title I office. The Title I Director signs off on all invoices/contracts prior to the issuance of payment for services by the Payroll Department or Accounts Payable Office. These contracts and invoices must be maintained and kept in the Title I files.

*Conflicts of Interest:* Employees of the Thomaston-Upson School System who are engaged in the selection, award and administration of contracts shall abide by the following:

- No employee, officer, or agent may participate in the selection, award, or administration of a contract supported by a federal award if he or she has a real or apparent conflict of interest (2 CFR §200.112).
- Such a conflict of interest would arise when the employee, officer, or agent, any member of his or her immediate family, his or her partner, or an organization which employs or is about to employ any of the parties indicated herein, has a financial or other interest in or a tangible personal benefit from a firm considered for a contract.
- Officers, employees, and agents of the Thomaston-Upson School System may neither solicit nor accept gratuities, favors, or anything of monetary value from contractors or parties to sub-contracts.

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

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

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

## **Supplement vs. Supplant**

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

Title I uses the follow questions to ensure that programs are supplementing, not supplanting:

Respond "NO" to the following questions:

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

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

- Does federal, state, or local law require this program?

- Did the school provide the program with non-Title I funds in prior years?

If the answer to either of these questions is “Yes” then Title I funds cannot be used. Title I funds in a Schoolwide Program are expected to demonstrate that they are *over and above* the amount provided to all schools in the district. The Thomaston-Upson School System Federal Programs Director will train all parties in Supplement Vs. Supplant annually as part of the budgeting process.

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

- Were required to be made available under other federal, state, or local laws.
- Were provided with non-federal funds in prior years.
- Were provided to Title I participating children, if those same services are provided with non-federal funds to non-Title I children.

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

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

*Methodology to Allocate State and Local Funds to Each School.* To ensure that all schools receive all state and local funding earned, during its annual budget cycle, the district uses projected enrollment as well as the number of certificated and non-certificated staff members earned with state and local funds to serve the anticipated enrollment for the coming year. Federally funded personnel are in addition to the number of teachers required to meet maximum class size as determined by the district locally as part of the Strategic Waivers School System contract with the GaDOE. The district provides each school with instructional materials including technology, instructional software, supplies, and consumable materials as needed for successful implementation of programs.

## **Comparability of Services**

All schools within the Thomaston-Upson County School System are Schoolwide Title I Schools. Therefore, it is not necessary to complete comparability of services.

## **Equipment and Real Property**

Title I inventory is maintained on a spreadsheet by school that identifies the item, serial/identification number, description, source of funding, Federal Award Identification Number (FAIN), vendor, date of purchase, cost, location, and condition. Equipment purchased with Title funds is permanently marked with “Title I” and the fiscal year in which the equipment was purchased. Physical inventories are



conducted annually. Each school receives the “General Guidelines for the Use of Title I Equipment” provided by the Georgia Department of Education, and the information provided within the document is discussed with Principals and Media Specialists, who manage the actual disposition of equipment. Inventory.

An electronic inventory database is maintained at the school-level by the designee selected by the Principal. The database that is updated by the school Principal or designee each time new equipment is purchased. All Title I property must be aligned with the program purpose (2 CFR 2 CFR §200.453 (a)) and is identified by permanent markings on the equipment that signify Title I and the fiscal year the equipment was purchased. The database includes the item name, a description of the property, serial/identification number, source of funding (including the FAIN), who holds title, acquisition date/date of purchase, cost of property, percentage of federal participation if costs were shared, vendor name, school, equipment location, use/purpose, current condition, and disposition of equipment (2 CFR §200.313 (d)). School personnel must annually verify the location and condition of the equipment, and the physical inventory must be signed and dated by the person conducting the inventory twice each year. Each item must be checked/noted on the inventory record specifically for condition and location. Principals attest that the equipment is as identified on the inventory record submitted to the Title I Director. Technology personnel help determine the condition of electronic equipment. All Title I items are checked out through the school’s media center to ensure accurate location and security. Pilferable items such as electronic equipment (iPads, tablets, Chromebooks, laptops) are stored in locking sync and charge carts when not in use. The school Principal is responsible for training staff on the intended use of federally purchased property and for ensuring usage is aligned with the program’s purpose and the CIP/School-wide Plan. Property purchased with federal funds is to be used only for the purposes outlined in the grant and may not to be used off-campus without prior written permission from the Program Director (2 CFR 2 CFR §200.313(a)(1,3),(c)). Materials must be checked out from the school’s media center, as documented in the circulation system. System personnel maintain equipment whenever possible, as electronic work orders and technology requests are filtered to central office, where the Technology Specialists and Maintenance Department manage these requests. All reports of loss, theft, or damage are made in writing to the Director of Federal Programs, who investigates them with the school Principal. When a piece of equipment needs to be disposed of, disposal forms are completed and kept on file. Disposal occurs according to the Thomaston-Upson School System disposal procedures. In keeping with 2 CFR §200.313 (e), property purchased with federal funds is first offered to another federal program if no longer needed for the original program’s purposes. Electronic and hard copies of the inventories are filed with the Director of Federal Programs. The Thomaston-Upson School System LEA Equipment Disposition Policy, along with applicable state and federal laws, will be followed for the disposition of equipment and real property purchased with Title I, Part A and other federal funds (2 CFR §200.313(d)). Disposed items must remain on inventory for a period of five years.

## Lease of Equipment

The school system does not lease equipment using Title funds.

## Use of Equipment in Targeted Assistance Schools

The school system does not have any targeted assistance schools.

### Site Visits

Random site visits may occur throughout the school year. For formalized monitoring, at least one scheduled site visit will take place each Fall by the Title I 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 Director to review procedures and pertinent information. During the site visit, the Title I Director will work with principals to correct any findings and answer any questions.

### Equipment Disposition Procedure

When computer equipment is no longer operational, it will be recycled or disposed of.

Schools are given the opportunity each summer to dispose of technology that is out of date or no longer operational. The appropriate Technology Disposal Form should be completed and a copy sent to the Title I Director. Inventory records will need to be corrected, printed, and maintained by school Media Specialists. 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 recycle or disposal of equipment.

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

1. File an incident report with the SRO
2. Attach the incident report to the Technology Disposal Form and send to the Title I Director's office.
3. Make corrections to the Title I inventory.
4. Send the updated inventory to the Title I office. The principal must sign and date the inventory spreadsheet.

## Cash Management

### Internal Control Procedures

1. Each budget is prepared at the school level, reviewed by TI Director, revised by school personnel (if necessary), and approved by the TI Director. Once the school makes the necessary compilation and the budget is submitted and approved by the state, each school or department fills out a purchase order requisition.
2. Principal/Teacher/Parent Involvement Coordinator initiates the Requisition Form, complete with:

- Complete vendor information including phone number (and fax number if applicable)
  - Ship to information including the address for the school
  - Principal or designee assigns the appropriate account number based on the budget sheets
  - Principal must sign after he/she verifies the materials being requested are part of the SWP.
3. The requisition is then sent to the Title I Director for review.
  4. The TI Director reviews the requisition to assure that the purchase is included in the School Improvement Plan.
  5. The TI Director then signs off on the requisition and forwards the requisition to the Director of Finance for review.
  6. The Director of Finance reviews and then forwards the requisition to the Purchasing Clerk who assigns a P.O. number and completes the purchasing process. If the requisition is over \$500 the Director of Finance send to the Superintendent for review and approval. The Superintendent then forwards to the Purchasing Clerk.
  7. When the merchandise arrives, the school or department then reviews and approves the AP form and returns to the Director of Finance for review prior to payment processing by the Accounts Payable Clerk.

## Pre-Approval of Purchases

The Thomaston-Upson School System has procedures in place for Title Purchases to maintain internal controls and to avoid fraud, waste, and abuse of federal funds. All purchases must be pre-approved prior to an order being placed. This includes orders from RESA and other companies where orders can be placed online.

## Draw Down Procedures

The Finance Director draws down funds as follows:

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

## **Reporting Procedures**

Copies of completion reports for the previous fiscal year will be kept on file in the Finance Department. Accounting records to support the results of outlays (expenditures indicated in the completion report will be kept on file in the Title I office and Finance Department. Copies of expenditure (cumulative through) reports for the respective quarter for total expenditures reported to GaDOE will be kept on file in the Title I office and Finance Department. Title I Director will run budget summary and detailed expenditure reports for all 400, 402, 408, and 414 funds. Title I Director gives budget summary reports to each administrator/school at monthly Principals' meeting.

## **Services for Homeless Children and Youth**

Thomaston-Upson Schools homeless liaison works very closely with school guidance counselors to assure students receive needed services. Policy JBC(1) was recently reviewed for procedures for homeless students. The district submits, through the Consolidated Application's Coordination Tab and Student Record, information about the number of homeless children and reports educational and related support needs through an annual survey in the MyGaDOE portal.

### **Identification**

The Thomaston-Upson County School Federal Programs Director works with school counselors in the registration and counseling processes to identify homeless children. The LEA also coordinates with social workers, DFACS, and other agencies to identify its homeless children. The school counselors assess related needs of the homeless children and youths and plans strategies to meet those needs. Case study information is used to identify related needs such as a need for personal school supplies or tutoring. To identify the educational needs of the homeless children, Thomaston-Upson County uses attendance and disciplines data, as well as grades and achievement test results. Available data and information is used to produce a summary of needs. The LEA requires each school to make a statement providing guidance/direction to teachers in reference to not isolating or stigmatizing homeless children in their individual teacher handbooks. The Special Education Director collaborates with other agencies in order to appropriately identify homeless children in need of special education and related services through Child Find activities.

### **Program Procedures**

- The district is responsible for identifying a homeless liaison.
- Homeless students will be identified based on the definition prescribed by McKinney-Vento Homeless Assistance Act and via a numeric code in the district's student information system. All staff in the district will be trained in the identification and recruitment of homeless students.
- The homeless liaison will provide annual training for all district level and school staff having contact with homeless students.
- All principals will receive annual training on the identification and needs of homeless students.

- All schools will display flyers, brochures, and posters that identify the Homeless Liaison contact information.
- Services for homeless students (tutoring, etc.) will be evaluated based on student academic achievement.
- Follow BOE policy

## School Selection

The Thomaston-Upson School System only has one school per grade span: PreK, K-3, 4-5, 6-8, and 9-12. Therefore, school selection is not an issue.

## Enrollment

Enrollment of Homeless students occurs at the appropriate school to which they are assigned based on their grade level. School registrars are trained and attentive to the identification of homeless students during the enrollment process. Any identification of a “homeless” student/family will be immediately submitted to the Homeless Liaison for further investigation.

## Information Dissemination

The Homeless Coordinator and/or Principals provide information to faculty and staff on the Homeless Program annually in the fall. The Parent Involvement Coordinator distributes posters and brochures in the counselor’s office and Parent Involvement Resource Room. Posters and brochures are also distributed to the community at DFACS and the Civic Center.

## Transportation

As with all students served in the Thomaston-Upson School System, transportation is provided for homeless students.

## Disputes (Complaint Procedures)

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

## **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. It is also to prevent at-risk youth from dropping out of school, and to provide dropouts, and children and youth returning from correctional facilities or institutions for neglected or delinquent children and youth, with a support system to ensure their continued education.

The Rock Ranch and Winshape Homes serve as the only two neglected institutions within the boundaries of the Thomaston-Upson School System. Thomaston-Upson Schools serves these students using funds set aside in the Title I budget for neglected institutions. These funds provide afterschool tutors, as well as supplies and computers on an as needed basis. No staff members, other than afterschool tutors, are funded using Title I funds.

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

## Class Schedules and Calendar

Students residing in neglected institutions attend school on the campus of the Thomaston-Upson School System and follow the same academic calendar and schedules as all students in the school system.

## Parental Involvement

Students residing in neglected institutions attend school on the campus of the Thomaston-Upson School System. Therefore, the Parental Involvement Plan at each school serves as the plan for the families that house neglected students. In addition, house parents of neglected students receive the same invitations to Parental Involvement activities as all other students in the school system.

## **Title VI, Part B – Rural and Low Income**

### Purpose

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

### Use of Funds

An eligible LEA may use RLIS funds for:

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

## **Pre-Kindergarten Programs**

The district does not reserve funds for pre-kindergarten programs at this time. The Pre-K Director meets with area Head Start and private daycare centers to discuss potential concerns.

Policies and procedures will be put in place if the district determines that this is a Title I need in the future.

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

## **Title II, Part A - Teacher and Leader Effectiveness**

### **Purpose**

The goal of the Title II-A program is to increase student achievement consistent with challenging State academic standards; to improve the quality and effectiveness of teachers and principals; to increase the number of teachers and principals who are effective in improving student academic achievement in schools; and to provide low-income and minority students greater access to effective teachers and principals.

### **Equity Belief Statement**

The Thomaston-Upson School District believes all students should have equitable access to academic instruction by effective teachers. The Thomaston-Upson School District strives to recruit, prepare, train and support high-quality teachers, paraprofessionals and leaders in our school system. We are also focused on developing school and district level improvement plans with measurable objectives that will ensure that all teachers teaching core academic subjects are and remain highly qualified.

### **Annual Needs Assessment Process**

The Thomaston-Upson County School System completes an annual Comprehensive Needs Assessment (ESEA Sec. 2122(c)(1), Sec. 2122(b)(7), Sec. 2122(c)(2)) in the spring of each year that addresses each of the following areas:

- *Professional Learning*
  - Student Supports and Interventions
  - Teacher Development
  - Leader Development
  - Professional Growth
- *Personnel*
  - Recruitment
  - Retention
  - Effectiveness
- *Factors Affecting the Learning and Work Environments*
  - Climate
  - Support Programs & Interventions
- *Title II, Part A Administration*
  - Prioritizing Funds
  - Needs Assessment/Consultation
  - Internal Controls

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

## Equity Plan

The Thomaston-Upson School System Equity Plan for Title II-A is revised each May/June using needs assessment survey and other forms of current data. The Equity Plan serves as the plan detailing professional learning and effective equitable access to effective teachers. Department Directors, school and system leaders, as well as, community and parent stakeholders are to be involved in the revision process as a part of the needs assessment. As the Equity Plan is revised, it is shared with elementary, middle, and high school council committees. Principals seek input from school council members (administrative staff, teachers, community business partners, and parents) and then give feedback for revisions. Meeting agendas and sign-in sheets will be maintained as evidence and documentation of stakeholder involvement in the revision process. Documentation supporting the Equity Action Plan initiatives is maintained at the central office by the Title II Coordinator (ESSA Sec. 1111(g)(1)(B), 1112(b)(2), 2101(d)(2)(E), 2103 (b)(3)(B)).



## Prioritization of Needs

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

## Authorized Use of Funds

Title II funds can be used for recruitment, retention, professional development, and class size reduction. Title II-A funds must be used to *supplement, and not supplant*, non-Federal funds that would otherwise be used for activities authorized under Title II-A. It is presumed supplanting has occurred in the following circumstances:

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

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

## Professional Learning

Professional Learning must be of high quality, sustained, intensive, and classroom-focused in order to have a positive and lasting impact on classroom instruction and the teacher's performance in the classroom and are not 1-day or short-term workshops or conferences. Professional learning activities are researched based or based on evidence of program success resulting in increased program success (ESEA Sec. 2122(b)(1)(B)). This documentation is maintained by each school. It must also address one or more of the annual LEA prioritized needs. Finally, professional learning must focus on increasing the ability of the teaching staff to help all students achieve high academic standards, or the school administrative staff to lead their schools' efforts to increase student academic achievement.

Professional contracts require certificated employees to participate in professional learning annually. Annually, Principals submit professional learning spreadsheets indicating whether the teacher has participated in high-quality professional learning. The LEA uses these spreadsheets to calculate the percentage of teachers participating in high quality professional learning. Additionally, requests for professional learning expenditures (conferences, books, seminars) are evaluated by the central office for alignment with the district/school Professional Learning Plan, and Principals also submit each spring a list of professional learning topics, derived from needs assessment data, and proposed funding sources. Thomaston-Upton School System coordinates all Federal, State, and Local professional learning activities and supporting funds (ESEA Sec. 2122(b)(4), Sec. 2122(b)(6)).

## **Title II A Effectiveness Evaluation**

The Director of Federal Programs will draft the annual Effectiveness Plan based on current planned budget expenditures in accordance with SEA requirements. The Effectiveness Plan is revised and uploaded if a budget amendment is submitted due to a change in needs and/or a significant change in budgeted strategies. Effectiveness of federally funded activities is evaluated annually using available student achievement results, process data, and stakeholder perception data (ESEA Sec. 2101(2), Sec. 2122(b)(2); 2 CFR 2 CFR §200.328(a)). Historical and longitudinal data are reported and compared to evaluate the impact of interventions. Artifacts and evidence of implementation are collected from schools as part of the ongoing monitoring process. This summary of program effectiveness is included in the subsequent year's Comprehensive Needs Assessment and is used to guide the development of the following year's program.

## **Internal Controls**

All written internal controls, procurement standards, and inventory/property management outlined in the Title I section of this handbook apply for Title II as well. The supplement not supplant test resides at the expenditure level for Title II.

## **Highly Qualified Teachers**

The Thomaston-Upson County School System systematically monitors professional qualifications and professional qualifications of its teachers based on demographics and a written remediation plan is created for each teacher who does not hold a valid clear renewable certificate or that is not highly qualified. The plan is monitored and supported with Title II-A funds. In compliance with ESEA/ESSA Sec. 1111(h)(1) & (5), the Thomaston-Upson School System requires that all school principals have a remediation plan and monitor the progress of the new hires, teachers who do not hold a valid, clear renewable certificate and non-Hi-Q teachers at their school. These logs must be kept on file for periodic review.

## **Recruitment, Placement, and Retention of Highly Qualified, Effective Teachers and Leaders**

The Administrative Council discusses the recruitment, placement, and retention of highly qualified, effective teachers and leaders during monthly meetings as necessary. The topic is also discussed at part of a review of data from the system annual needs assessment during the system leadership retreat held each June. Specifically, each principal is required to report the level of retention from the previous school year and improvement with the placement of highly qualified, effective teachers for the upcoming school year. System and school goals are then created or adjusted for the next school year.

## **Teacher Experience and Effectiveness Equity**

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

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

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

## **Class Size Equity**

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

## **Meeting the Diverse Needs of Students**

School personnel conduct focus walks (administrators and instructional coaches) as part of a system initiative to ensure that all classrooms follow the guidelines of a standards-based classroom. One of the items on the observation checklist is the use of differentiation to meet the diverse needs of students. The data from these focus walks is compiled at the school and system level, examined by the system Curriculum Advisory Committee and used to plan professional learning initiatives.

## **Procedures for HiQ**

The Title I office, along with Human Resources, will maintain a list that includes the status of all Title I paid staff. In Thomaston-Upson Schools, all staff paid from Title I funds must be highly qualified.

## **Procedures for Principal's Attestations/Certifications**

Title I office will prepare a memorandum requesting principals sign the attestation forms for all Title I, Part A and Title II, Part A paid staff prior to October 1 of each year. Forms will be signed at the end of December and at the end May and submitted directly to the Title I office. This information will be maintained in the Title I office. A copy will be given to the Personnel Department.

## **Procedures for Hiring Instructional Paraprofessionals**

Paraprofessional vacancies are posted on the webpage for Thomaston-Upson Schools. A job description is included. Paraprofessional Education Requirements are listed, including:

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

- or, Do you have a minimum of a high school diploma or GED, and understand that you must take and pass the GACE paraprofessional Assessment to be eligible for a Georgia Paraprofessional Certificate.

This ensures that the applicants have met the minimum qualifications to be Highly Qualified. Highly qualified applicants are then eligible to interview with principals. Principals make recommendations to Human Resources, and recommended candidates are fingerprinted and complete other employment paperwork.

## Procedures for Parent Notification of Non-HiQ

Principals will adhere to parent notification requirements for non-HiQ staff. Copies of the parent letters will be given to the Title I Director. This is not a requirement for the 2016-2017 school year.

## **Title III: English to Speakers of Other Languages**

### Purpose

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

### Student Assessment and Enrollment Procedures

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

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

### Exit Guidelines

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

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

In the absence of a state-mandated reading assessment, an English / Language Arts End of Grade or End of Course score will be utilized in lieu of the reading assessment. In the absence of an English/Language Arts EOG/EOC score, a district may choose to utilize an alternate assessment approved by the district.

According to GaDOE guidelines, “ELs who meet the criteria for proficiency are no longer eligible for language assistance services and must be exited. Title III law requires that districts monitor ELs for 4 calendar years following exit from language assistance services. If an exited student transfers from another state or a private school and the four-year monitoring was not completed prior to enrollment, the district is required to monitor the student for the remainder of the monitoring period. The district must maintain documented evidence that the student was monitored throughout the four-year monitoring phase.” To ease the transition from served to monitored status, ESOL teachers continue to monitor student grades, attendance, and discipline to ensure students are progressing and performing well academically. ESOL teachers continue to correspond with regular education teachers of monitored students if the data indicates students may be struggling in one or more areas. If needed, the ESOL teachers meet with monitored students to assist them in any areas in which they may be struggling.

## Funding

While the Thomaston-Upson County School System does not receive direct funding for ESOL students, the school system is part of a consortium of districts with small ESOL populations. Funds are available through the consortium to purchase instructional materials and resources for the ESOL program. Specific requests should be made to the Director of Federal Programs.

All requests for purchases follow internal controls:

- 1) A reimbursement request is emailed to the Title III Program Manager by the Director of Federal Programs.
- 2) The Title III Director reviews the expenditure for allowability, reasonableness, necessity, and allocability. After double-checking the account number with the approved budget and the descriptions, the Director of Federal Programs completed the reimbursement request from the Title III Consortium prior to the purchase or conference.
- 3) The Title III Director forwards the requisition to the Director of Finance for reimbursement processing back to the consortium.
- 4) District purchasing procedures are followed for all Title III requisitions.
- 5) All receipts are returned to the Purchasing Clerk/Finance Department for back-up documentation. Equipment and purchases with a shelf-life of longer than one year are logged on the school inventories as required under system inventory procedures.

## Professional Learning

ESOL teachers will meet with every regular education teacher of EL students and administrators to ensure understanding of the WIDA standards and Can Do Descriptors. ESOL teachers will also provide WAPT and ACCESS scores for every student and assist teachers with understanding appropriate expectations based on these scores and the student's level of language acquisition. The results of the annual needs assessment will also be used to determine agenda items for the teacher training. An ESOL professional learning plan has been developed and is updated annually. Two meetings will be held yearly with parents of EL students to inform them of ways to assist their students academically, as well as make them aware of school programs and activities.

## Program Evaluation and Accountability

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

## Services for Private Schools

Invitations for private schools to consult in participation in federal programs the following calendar year are sent in the fall, usually October, via receipt delivery. A meeting is held to present information about the programs available to students in private schools. All federal program directors are invited to the meeting, which is complete with an agenda and sign in sheet. Upon receipt of the intent to participate form, which is provided to private school officials, a meeting is held to discuss plans and the required components of Title I services for private school students. Meetings are scheduled every two months to discuss the progress and process of Title I series. Currently Thomaston-Upson Schools is not serving any private schools.

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

When a private school determines that the school would like to participate in Title I or Title II, the district will determine the per pupil allocation for qualified students. The following guidelines will ensure appropriate and equitable participation (ESEA Sec. 9501(a)(1)).

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

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

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

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

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

## Documentation for Participation

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

## Identification of Participants

LEA works closely with the private school to verify attendance area of possible students.

It is the responsibility of the private school to provide potential students names, addresses, and verification of free and reduced participation for qualification of the student.

## Finance

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

## Complaints

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

## Evaluation

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

## Equipment

The private schools will follow the same procedure as Thomaston-Upson Schools schools.

## Timeline for Private Schools

Month	Activity
October	<ul style="list-style-type: none"> <li>Send letter to request participation to private schools who work with students from Thomaston-Upson Schools for the following school year. Hold Private School Meeting consultation</li> </ul>
October	<ul style="list-style-type: none"> <li>Gather data and consult with private school to determine services and possible participants</li> <li>Begin to gather data for Eligible Participation Worksheet</li> <li>Remind private school that any materials or purchases must be requisitioned and remains the property of Thomaston-Upson Schools</li> </ul>
August of following year	<ul style="list-style-type: none"> <li>Verify addresses of students attending private school that wishes to participate</li> <li>Begin services</li> <li>Note: If there is a third party vendor, see policy for third party vendor from GaDOE. Sign a letter that states the requirements on both parties to enter into agreement.</li> </ul>
September- November	<ul style="list-style-type: none"> <li>Visit site to determine services are rendered in accordance with federal requirements. Monitor all services regularly.</li> </ul>
January – May	<ul style="list-style-type: none"> <li>Visit site to determine services are rendered in accordance with federal requirements.</li> <li>Monitor all services regularly.</li> <li>Plan for evaluation of services with a survey at the end of April.</li> </ul>

## Academic Achievement Awards Program

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

**(1) Highest-Performing Reward School** – a Title I school among the Title I schools in the State that does not meet the definition of a Priority or Focus school and has a 3-year average of Content Mastery category performance and ranked in the highest 5% of ranked schooled by 3-year average of category performance. The school must not have more red Performance Flags



than a typical Title I School and must not have significant achievement gaps between subgroups. Achievement Gap score must be  $\geq$  state's average Achievement Gap score for Title I Schools; or

**(2) High-Progress Reward School** – a Title I school among the Title I schools in the State that does not meet the definition of a Priority or Focus school and has a 3-year average of Progress scores and ranked in the highest 10% of ranked schools by 3-year average of Progress scores. The school must not have more red Performance Flags than a typical Title I School and must not have significant achievement gaps between subgroups. Achievement Gap score must be  $\geq$  state's average Achievement Gap score for Title I Schools or have improved their Achievement Gap score from the prior year.

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

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

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

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

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

## **Title I, Part C - Migrant Education Program (MEP) Services**

The Thomaston-Upson County school district uses the occupational survey provided by the MEP coordinator to identify migrant students. A system liaison from the Migrant Educational Program (MEP) makes contact with each migrant family to determine case-by-case eligibility and needs. Migrant students are evaluated academically the same as other students in the system to determine academic needs. All migrant students are eligible for Title I services, and receive appropriate Title I services. In addition a referral is made to student services to indicate that additional services may be needed from

that department. Additionally, specific activities to address the needs of migratory families are provided. Such activities shall include informing children and families of, or helping such children and families gain access to other education, health, nutrition and social services. A migratory Parent Advisory Council (PAC) program is provided in conjunction with other Parent Involvement Programs. Parent outreach is provided in a language that is understood by the family if at all possible. The DOE TransAct program is used for translation as well as private consultant when needed. Parents are presented information on ESOL, special education, gifted, and other educational programs. Information on health, nutrition and social services is presented using materials from the migrant educational agency. Presenters from local agencies such as, the Health Department, DFACS, and County Extension office may be involved.

## **Charter Schools**

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

## **Special State Charter Schools**

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

## **Race to the Top (RT3) Project Management and Sustainability**

The district does not participate in Race to the Top (RT3) at this time. Procedures will be put in place if participates in the future.

## **Complaint Procedures**

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

## **Ethics Fraud, Waste and Abuse, and Corruption**

The Title Director reviews the ethics, fraud, waste and abuse, and corruption policies with all administrators during the summer seminar. An agenda and sign in sheets will be kept by the Title I Director to document this has been completed. Principals and Central Office Directors discuss the same

information with their personnel. Each principal or Director submits agendas and sign-in sheets to the Title I Director to verify the policies have been reviewed with all staff. A signature, by the person reviewing the policies, verifies the completion of this procedure. Principals are expected to inform their faculties about policies and updates as they are approved throughout the year.

## Ethics

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

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

## Reporting Suspicion of Fraudulent Activities

- Purpose:** To ensure the reporting of suspicion of fraudulent activity, the Thomaston-Upson Schools provides employees, clients and providers with confidential channels for such reporting.
- Definitions:** Fraud: A false representation of a matter of fact, whether by words, by conduct, or by concealment of that which should have been disclosed, that is used for the purpose of misappropriating property and/or monetary funds.
- Statement of Administrative Regulations:** The Thomaston-Upson Schools thoroughly and expeditiously investigates and reported cases of suspected fraud to determine if disciplinary, financial recovery and/or criminal action should be taken.
- Confidentiality:** All reports of suspected fraud must be handled under the strictest confidentiality. Only those directly involved in the investigation should be provided information regarding the allegation. Informants may remain anonymous but should be encouraged to cooperate with investigators and should provide as much detail and evidence of alleged fraudulent acts as possible.
- Procedures and Responsibilities:**
1. Anyone suspecting fraudulent activity should report their concerns to the Thomaston-Upson Schools, School Superintendent, or Finance Director at 706-647-9621.

2. Any employee with the Thomaston-Upson Schools (temporary staff, full-time staff and contractors) who receives a report of suspected fraudulent activity must report this information within the next business day.
3. Employees have the responsibility to report suspected fraud. All reports can be made in confidence.
4. The Thomaston-Upson Schools Board of Education shall conduct investigations of employees, providers, contractors, or vendors.
5. If necessary, the person reporting will be contacted for additional information.
6. Periodic communication through meetings should emphasize the responsibilities and channels to report suspected fraud.

## Fraud Prevention Policy (DIE)

The Thomaston-Upson School District (“District”) shall not tolerate fraud of any kind and has an established system for the reporting of suspicious activities.

“Fraud” is defined as a false representation of a matter of fact, whether by words or by conduct, or by concealment of that which should have been disclosed, that is used for the purpose of misappropriating property and/or monetary funds from federal, state, or local grants and funds.

Employees and parties maintaining a business relationship with the District who suspect fraud, whether it pertains to federal, state, or local programs, should report their concerns to the Superintendent or his/her designee. If fraud is suspected by the Superintendent, such allegations should be reported to the Chair of the Board of Education.

All reports of suspected fraud shall be handled under the strictest confidentiality allowed under the law. Informants may remain anonymous as allowed by law but are encouraged to cooperate with investigators and to provide as much detail and evidence of the alleged fraudulent act as possible.

Any and all reports of suspicious activity and/or suspected fraud will be investigated. Results of an investigation shall not be disclosed to or discussed with anyone other than those individuals with a legitimate need to know until the results become subject to public disclosure in accordance with state and/or federal law.

## Assessment Security

Testing Coordinator: Julie English

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

### **Training Plan**

#### **I. Materials:**

- a) All school testing coordinators must have a sign-in sheet for documentation of teacher and proctor participation.
- b) GaDOE updates provided on each test being administered will be provided as a reference/resource for school testing coordinators.
- c) A District meeting held with school testing coordinators to indicate any special requirements from the district.
- d) School Coordinator's Manuals and Examiner's Manuals are usually available on the GaDOE's website. Please use these manuals to assist in training. All manuals must be kept secure and accounted for after each use.
- e) School Coordinators should refer to the Roles/Responsibilities for all individuals being trained from the GaDOE Student Assessment Handbook including but not limited to: coordinator, principals, examiners, and proctors. Training covers each group's roles/responsibilities as documented on the sign-in sheets. Examiner's and Proctors sign acknowledging responsibilities for testing. Any violations of the procedures will be investigated by the School Test Coordinator and the System Test Coordinator. Violations may be submitted to the GaPSC.

#### **II. Topics:**

- a) Arrangement of delivery of materials by the Director of Assessment to the school coordinator. The Director of Assessment and School Test Coordinator check the shipment for accuracy of the delivery. Make checks of confirmations and notations of inaccuracies. The materials list is initialed and dated with both parties retaining a copy.
- b) In order to maintain the integrity of the assessment program and its results, security must be established and maintained. The responsibility of the assessment program at the school level rests with the principal and their designated school test coordinators.
- c) School Coordinators use the Student Assessment in Georgia Schools (PSC document) to discuss the testing ethics and consequences of violations. Examiner's sign and date a copy of these guidelines.

- d) School Coordinators use the Examiner “Must Do” page from the GaDOE’s Student Assessment Handbook as a part of the training at the school level.
- e) School Coordinators are trained in using the forms required from the GaDOE Student Assessment Handbook.
- f) School Coordinators are responsible for ensuring proper coding of test documents and coding within the online platform.
- g) School Coordinators are responsible for checking the accuracy of student information.
- h) School Coordinators are required to have test examiner’s sign materials in and out each day during test administration.
- i) Proctors are used when required. All test proctors are trained on their roles/responsibilities.
- j) Testing Procedures are clearly articulated to ensure a smooth and problem-free test administration. Schedules, groups and location assignments, and special directions are distributed and explained before testing administration by the School Test Coordinator.
- k) Accommodations are well documented by the Special Education Department. School coordinators carefully check to ensure students are provided the appropriate and accurate accommodations for each individual test.

### III. Collection of Materials

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

## Appendix A: Complaint Procedures

### A. Grounds for a Complaint

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

### B. Federal Programs for Which Complaints Can Be Filed

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

### C. Complaints Originating at the Local Level

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

### D. Filing a Complaint

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

- A statement that Thomaston-Upson 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:

Julie English, Federal Programs Director  
 Thomaston-Upson County Schools  
 205 Civic Center Drive  
 Thomaston, Georgia 30286

Once the complaint is received by Thomaston-Upson County Schools it will be copied and forwarded to the Federal Programs Director.

#### E. Investigation of Complaint

Within ten (10) days of receipt of the complaint, Thomaston-Upson County Schools will issue a Letter of Acknowledgement to the complainant that contains the following information:

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

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

#### F. Right of Appeal

If an individual, organization, or agency is aggrieved by the final decision of Thomaston-Upson 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 ESEA Sec. 9304, 9306, and 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 Thomaston-Upson County Schools' decision and include a complete statement of the reasons supporting the appeal.



## **Appendix B: Travel Regulations-Thomaston–Upson Board of Education**

Completing the Employee Expense Statement:

1. To be eligible for reimbursement for travel and conference expenses, you must have prior written approval from the Superintendent for attending these meetings. Approval forms are available from your principal or the Central Office. The approved professional leave from must be attached to travel voucher.
2. Be sure to include the departure and arrival time for each listing.
3. Detailed receipts must be attached for ALL meals, hotel bills, conference registration fees, and transportation by common carriers by scheduled plane, train, or bus.
4. Beginning and ending odometer readings must be listed for reimbursement for use of personal car at the rate of .54 cents per mile (effective January 1, 2016). Auto tag number should also be listed. Local transportation costs will not be allowed between the individual's home and school headquarters.
5. Meals and lodging costs must be entered separately in the indicated spaces even though they may be included on the same hotel bill receipt.
6. No reimbursement will be allowed for alcoholic beverages, entertainment, personal expense, or any portion of conference fees covering social activities.
7. Properly completed employee expense statements should be received in the Central Office no later than five (5) working days after the end of the month in which the travel occurred. No payment can be made for travel expense statements received after June 30, the end of the current fiscal year.

Meal Regulations:

1. In most parts of Georgia reimbursement for individual meals is limited to \$6.00 for breakfast, \$7.00 for lunch, and \$15.00 for dinner, or \$28.00 per diem, provided you meet the requirements in items 3, 4 and 5 below. A detailed receipt must be included.
2. In Atlanta, Augusta, Jekyll Island, and Savannah reimbursement for individual meals is limited to \$7.00 for breakfast, \$9.00 for lunch, and \$20.00 for dinner, or \$36.00 per diem, provided you meet the requirements in item 3, 4 and 5 below. A detailed receipt must be included.
3. For non-overnight trips, traveler will receive no more than the receipted amount up to 75% of the allowable per diem for the individual meal if travel is more than 50 miles from home and the

traveler is away for more than (12) hours.

4. For overnight trips, traveler will receive no more than the receipted amount up to 75% of the allowable per diem for the individual meal on day of departure and return.
5. Per diem allowances are calculated based on the last location of the travel day. For overnight travel the calculation is based on the last business location. For overnight travel the calculation is based on the location of lodging for each night of travel.

#### Lodging Regulations:

1. Reimbursement will be made for actual lodging expenses up to \$75/day plus GA sales tax. For lodging expenses that exceed \$75/day reimbursement may be made if scheduled meeting or seminar occurs in the host hotel/motel. Thomaston-Upson County Schools will reimburse at the rate for single occupancy at the host hotel/motel. If an employee stays at a nearby hotel/motel at a higher rate, then the employee will not be reimbursed for the difference in cost. Should lodging be paid by the system purchasing card or check no GA sales tax will be paid or reimbursed.
2. Upon arrival at a motel, furnish the motel operator the certification for being exempt from paying state hotel/motel excise tax. This excise tax cannot be reimbursed from the Thomaston-Upson Board of Education. (A copy of this form is attached to the travel voucher forms.)
3. Reimbursement for meals and lodging exceeding the above maximums must be justified in writing and approved by the Superintendent. (Example: A planned meal that is a part of conference activities.) Approved justification must be attached to travel voucher.

#### Airfare Travel:

1. In the event there is a charge for checking luggage, TUBOE will reimburse for a maximum of one (1) piece of checked luggage.
2. If a refundable fare must be used, the difference in the cost of the flight should not exceed \$150.00.
3. Lower cost flights should be chosen within two hours before or after the preferred flight time when the alternative flight saves \$200.00 or more roundtrip.

Revised 01/05/2016