

**Jefferson County School System  
Federal Programs  
Policies and Procedures  
2023-2024**



**Revised: 12/15.21, 3/25/22, 4/13/22, 4/21/22** (requested ESSER changes)

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## **PURPOSE OF HANDBOOK**

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

The information contained in this handbook will promote uniformity in operations as federal program directors/coordinators seek to carry out official duties and responsibilities. The Georgia Department of Education (GaDOE) provides Local Education Agencies (LEAs) extensive guidance on the overarching requirements for all federal programs with the on-site monitoring document that is used to ensure that LEAs are meeting all statutory requirements for these programs. These specific requirements are used to update this handbook.

## **SECTION 1: LEA MONITORING/TECHNICAL ASSISTANCE OF SCHOOLS AND PROGRAMS**

### **JEFFERSON COUNTY FEDERAL PROGRAMS MONITORING SCHEDULE POSITIONS RESPONSIBLE, FREQUENCY, DOCUMENTATION**

<b>Task</b>	<b>Frequency</b>	<b>Where/How</b>	<b>Position Responsible</b>	<b>Documentation</b>
Budget/ Expenditures	Monthly	CO/Budget Detail Reports	All Federal Programs Directors/ Comptroller	DE0147 and supporting documentation
Personnel Allocations	Periodically	CO/Budget Detail Reports/Account Coding	All Federal Programs Directors/Comptroller	
School Wide Plans	Quarterly	Data Digs with Central office and schools	Superintendent and all Federal Program Directors	Minutes
PL Implementation	Monthly	Instructional Coordinators/Coaches Meetings	Title II-A Director	Sign-in sheets, agendas, and presentation documents
Parent Engagement	Monthly	Parent Involvement Activities	Title I Director/Principals	Sign-in sheets, agendas, and presentation documentation
Inventory	Bi-Annually	CO/Schools	Title I Director/Special Ed Direct/Technology Coordinator	Destiny software
Homeless	Monthly	Homeless documentation	Homeless Liaison	Registration, attendance, and referrals
Foster Care Children	Monthly	Foster care documentation	Foster Care Liaison	Registration, attendance, and referrals
Needs Assessment Plans	Monthly February- June	CO/System Level Planning	Title I and Title II-A Directors	Sign-in sheets, agendas, Needs Assessment
Equity Plan	Monthly February- June	CO/System Level Planning	Title II-A Director	Equity document/CLIP
Consolidated Application	May - July	CO/System Level Planning	All Federal Program Directors	Sign-in sheets, agendas. CLIP
Neglected	Fall	Complete Survey	Title I Director	Survey
ESSER (not subject to Supplement Not Supplant)	Frequently	CO/System Level Planning Observations, Budget Detail Reports	Title I Director, CFO	DE0147 and supporting documentation, Observation documentation, Sign-in sheets, Agendas

ARP/ESSER Six month review	Due in April and October	Review ARP Plan and budget - revised if needed	System Leadership Team	Updated plan and budget
ARP/ESSER Maintenance of Equity	Due in October (or more often if instructed to do so)	Calculate and submit Maintenance of Equity	CFO	Fiscal and staffing equity
Supplement Not Supplant (with the exception of ESSER)	On-going	Scrutiny, review and approval of purchases/contracts by appropriate Federal Director	All Federal Program Directors	Purchase orders/ Contracts
<b>IDEA</b>				
	<b>Frequency</b>	<b>Where/How</b>	<b>Position Responsible</b>	<b>Documentation</b>
MOE Maintenance of Effort	Annually	GADOE/LEA Calculations done at GADOE-LEA makes necessary adjustments in order to meet standards, if failed.	Office of Finance and Business at GADOE/ Comptroller at LEA	MOE calculations Local Budgets Detailed Expenditure Reports
Excess Costs	Annually	Locally/LEA reviews GADOE calculations	Comptroller	GADOE calculations Detailed expenditure reports
Supplement Not Supplant	On-Going	LEA/Review of MOE Standing	All Federal Programs Directors	Budget History Detailed Expenditure Reports
Coordinated Early Intervening Services (CEIS)	Monthly/ Quarterly	LEA/15% of Federal Funds are designated by GADOE, CEIS Plan, including budget is developed by LEA, approved by GADOE.	Special Education Director	CEIS Plan w/ budget Expenditure Report, Invoices, Agendas, Sign-in sheets, student data
Proportionate Share (of Federal Programs when applicable)	Monthly	LEA reviews calculations by GADOE and budgets services, after meaning consultation, accordingly.	Special Education Director	Proportionate Share calculations worksheet, Special Education data, student data, Detailed Budget reports, invoices

### **Budget Reports for all Federal Programs**

The appropriate Federal Programs Director periodically requests budget reports to review the budget against the general ledger and confirm use of correct funding codes. It also gives the Directors of the various Federal Programs a snapshot of recent expenditures. Each Director Federal Programs compares expenditures to the submitted budget narrative and follows through with schools regarding expenditures and adjustment of funds as needed.

### **NEEDED CORRECTIVE ACTION AT SCHOOLS**

Should corrective action be required as a result of ongoing monitoring of all federal programs including all parts of ESSER, schools will receive a verbal request with written follow-up from the Director of the related Federal Program.. Any formal corrective action should be completed immediately and by the due date given. Corrective action will be submitted to the Director of the related Federal Program and written verification stating completion will then be returned to the school for record-keeping. District corrective action plans will be completed by the appropriate Federal Programs Director and approved by the superintendent.

Corrective action from previous monitoring is discussed with principals in order to assist them in understanding the critical need for compliance with federal programs. In addition, GaDOE monitoring findings from all districts are shared with principals or staff as a means of understanding the impact of non-compliance. Professional learning is provided based on the needs but, in addition, professional learning is used as a preventive measure to ensure that all staff have a clear understanding of all expectations of every facet of the federal programs.

If corrective action is needed based on any monitoring, the appropriate Federal Programs Director will communicate to the appropriate staff member(s) the issue in writing or through a meeting and steps for resolution (if applicable). The appropriate Federal Programs Director will ensure that the proper documentation is maintained regarding the incident, the incident is corrected and additional training is provided as needed.

### **FOLLOW-UP/VERIFICATION OF CORRECTIVE ACTIONS**

Through Administrators' meetings, technical assistance meetings, Academic Interventionists meetings, site visits, e-mails, and phone calls, technical assistance is provided to schools on all Federal Program requirements including ESSER. At the Administrators' meetings, principals are provided information and details as they become available. Principals are encouraged to contact the appropriate Federal Programs Director with questions at any time.

### **Expenditures**

All school expenditure requests are approved by the appropriate Federal Programs Director. The appropriate Federal Programs Director compares all requests to the approved schoolwide plan and budget.

### **Required Elements of Parental Notices**

The Jefferson County School System will follow the required timeline in communicating to parents: Parents Right To Know and the School Improvement Status (if applicable). This communication will be in a language easily understood by

our parents, and will be made available in various ways (U.S. mail, website, email, paper copy, newspaper, local news stations, posted notices, or any other ways) to inform our parents and stakeholders.

### **Data Review**

Each year the District leadership team and Title I schools conducts quarterly data digs at all schools to review the data (CCRPI, state assessments, benchmarks, attendance, discipline, teacher data, and other demographic data) as part of their Comprehensive Needs Assessment and develop their School Wide Plan, Equity Plan, Parent Engagement Plan, and School-Parent Compact.

### **MONITORING OF TITLE I, PART A**

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 schoolwide 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. This includes monitoring School-Wide Plans including Parent and Family Engagement Plans, and School-Parent Compacts (refer to timeline for specifics on each of these components).

The Georgia Department of Education requires that the Jefferson County School System monitor the implementation of Title I programs and the expenditure of all funds associated with the program.

The System Title I Director monitors Title I schools through observation and review of documentation. Technical assistance is provided to schools that can assist in improving student academic achievement. The program ensures that all Title I activities are carried out in accordance with federal guidelines. The Title I Director monitors:

- Software Programs when applicable (May)
- Title I funded staff (August)
- Expenditures (Ongoing)
- Equipment (One time each semester)
- Plans (Ongoing)

The Title I Director monitors Title I schools to ensure compliance. School principals are also made aware of all Title I procedures and are expected to monitor the programs in their school.

### **Monitoring of Title I Staff**

- **Title I Staff**

Title I Staff will be monitored by the Title I Director and building principal. During each semester, the School Improvement Coordinator and the Superintendent will review TKES observation data with the building principal. Information is shared with the Title I Director.

- **Parent Coordinators**

The Title I Director works with the principals to monitor the Parent Coordinators at the three elementary schools. The Title I Director reviews the Title I Parent Engagement Notebooks at each school on an ongoing basis. Updates and reminders of Parental Engagement requirements are shared at least quarterly with the principals.

### **Jefferson County Federal Programs Yearly Timeline Monitoring**

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<p><b>July</b></p>	<p>Revise <b>Comprehensive LEA Improvement Plan</b> (CLIP) and submit to GADOE</p> <ul style="list-style-type: none"> <li>- Review SIPs / DIP (District Improvement Plan)</li> </ul> <p>Review / revise written Federal Programs guidelines and timeline</p> <p>Advertise and hold the Community meeting (if COVID numbers allow) to review CLIP, Title I LEA and school Parent Engagement Policies, School Compacts</p> <p>Send letter for Teacher/Paraprofessional Qualifications</p> <p>Send federal programs reminders to Principals</p> <ul style="list-style-type: none"> <li>- Procedures / guidelines review</li> <li>- Timeline review</li> <li>- Title I Open House</li> <li>- Title I Annual Meeting</li> <li>- Implementing SIP &amp; SWP</li> <li>- CLIP development and revisions</li> </ul> <p>Technical assistance with Per. Certs. (after end-year complete) Periodic Certification will be collected each semester.</p>
<p><b>August</b></p>	<p>Revise Comprehensive LEA Improvement Plan (CLIP)</p> <ul style="list-style-type: none"> <li>- Technical Assistance workshop (parental engagement)</li> <li>- Monitor progress with Parental Engagement implementation timeline</li> </ul> <p>Monitoring for compliance with school level Parent Notifications</p> <p>Mail School Designation letters (if applicable)</p> <p>List Title I employees (including PQ teachers, PQ Parapros, Instructional Coaches, and others: securing schedules or need for time logs if split funded)</p> <p>Check to make sure Homeless Survey (McKinney Vento Act) is completed &amp; Foster Care Referrals with Liaison</p>
<p><b>September</b></p>	<p>Complete Consolidated Application (predicator to CLIP and budgets)</p> <ul style="list-style-type: none"> <li>- <b>PI Assurances</b> if principals opt to sign</li> <li>- List of Title I personnel and schedule</li> <li>- Complete budgets based on DIP, SIPs, and SWP</li> </ul> <p>Ensure that Title I Evidence and Artifacts notebooks / files are set up</p> <p>Check that Homeless survey is done</p> <p>Schedule data digs to review BOY data</p> <p>85% Expenditure Requirement Deadline</p> <p>Parent notification of non-professionally qualified teachers</p>
<p><b>October</b></p>	<p>Completion reports due (Grants Accounting Online Reporting System (GAORS))</p> <p>Complete budgets based on DIP, SIPs, and SWP</p> <p>Complete <b>Neglected &amp; Delinquent</b> report (support N&amp;D facilities if applicable)</p> <p><b>Private School Consultation</b> letter (invitation for Dec. mtg)</p> <p>Provide technical assistance with school level parent workshops (<i>meeting document samples in Federal Guidelines appendices</i>), attend meetings, provide parent information)</p> <p>Attend Cross functional monitoring Training (if required)</p> <p>May request carryover waiver if needed</p>
<p><b>November</b></p>	<p>Conduct Title I Evidence and Artifacts notebook review</p> <p>Review expenditures; verify Title I personnel on payroll</p> <p>Attend any area Cross Functioning Training that might be available (if CFM year)</p> <p>Begin to set up official files for Cross functional monitoring (if required)</p>

	Run comparability as per GADOE timeline
<b>December</b>	<p>Align with budget and expenditures (adjust based on positions)</p> <p>Monitoring for compliance with school level parent engagement and documentation</p> <p><b>Provide SIP monitoring</b> support (if applicable)</p> <p><b>Provide TSI and Promise Schools</b> support (if applicable)</p> <p><b>Private Schools Consultation</b> for next school year planning</p> <p>Prep for Monitoring (self-monitoring of artifacts / Cross functional labeling and detailed evidence based on labels) - if applicable</p> <p>Run comparability as per GADOE timeline</p> <p>Technical Assistance with <u>Periodic Certs.</u></p>
<b>January</b>	<p>Technical assistance with Per. Certs. (after mid-year complete) Periodic Certification will be collected each semester.</p> <p>Review budget for amendments and carryover funds</p> <p>Submit carryover amendment</p> <p>Monitor expenditures with TSI and Promise Schools (if applicable: deadline June 30)</p> <p>Monitor progress with DIP</p> <p>Run comparability as per GADOE timeline</p> <p>Annual Review</p> <p>Needs Assessment</p>
<b>February</b>	<p>Provide technical assistance with school level parent workshops (<i>meeting document samples in Federal Guidelines appendices</i>), attend meetings, provide parent information)</p> <p>Align with budget and expenditures</p> <p>Begin to work with Title II-A on system Needs Assessment for next FY</p> <p>Schedule data digs to review MOY data</p> <p>Initiate Federal Programs Surveys for Parents, Staff, and Community</p> <p>Run comparability as per GADOE timeline</p> <p>Annual Review</p> <p>Needs Assessment</p>
<b>March</b>	<p>Review of district and school data; monitor progress with DSP</p> <p>Support schools as they begin to revisit needs assessment.</p> <p>Align with budget and expenditures</p> <p>Conduct Title I Parent and Family Engagement notebook review</p>
<b>April</b>	<p>Review of district and school data</p> <p>Begin revision of LEA <b>Parent and Family Engagement Plan</b> for next school year (with parental input)</p>
<b>May</b>	<p>Monitoring for compliance with assistance to school SIP revision (SIP process, sample SIPs, strategic plans leading to professional development plan)</p> <p>In depth alignment with budget and expenditures</p> <p>Deadline for Amendments</p>



	<p>Support schools in completing needs assessment (based on end of the year data).</p> <p>Provide technical assistance to schools to include all “new school year” parent engagement updates in handbook, website and other formats (Right to know, SIP, DIP, SWP).</p> <p>Federal Program Physical Inventory complete</p> <p>CLIP Revision Meetings</p> <p>Technical assistance with <u>Per. Certs.</u></p> <p><u>Schedule data digs to review EOY data</u></p>
<b>June</b>	<p>Attend Federal Programs Conference (if applicable)</p> <p>Homeless Training (conference)</p> <p>Self-Monitoring Checklist due (if non- Cross Functional monitoring year)</p> <p>Deadline to spend TSI and Promise Schools funds (if applicable)</p>

## **MONITORING OF EXPENDITURES**

### Expenditures

All purchases are approved by the appropriate Federal Programs Director according to federal guidelines and the Jefferson County School System Federal Programs Manual.

Artifacts include:

- POs
- Travel Reimbursement
- Federal Programs Manual
- Payroll

## **MONITORING OF EQUIPMENT**

### Equipment

All equipment purchased with federal funds is monitored by the district. Federal Programs Equipment inventories are monitored at least every two years. Artifacts include:

- Federal Programs Physical Inventory Logs

## **IDENTIFICATION OF HIGH RISK SCHOOLS**

Any school with the designation of TSI, PROMISE, and CSI will be considered High Risk. In addition, any school receiving a score below 60 on the CCRPI will be considered High Risk. Any school considered High Risk will be monitored closely by the Title I School Improvement Coordinator.

## **MONITORING OF FEDERAL PROGRAMS**

### **Implementation of Monitoring Procedures**

The appropriate Federal Programs Director will review the monitoring timeline at the end of each semester to insure that all events have taken place and that appropriate documentation is in place as evidence of compliance to written procedures.

## **MONITORING OF TITLE II-A**

Title II is monitored by the Title II Coordinator. The Human Resources Director, building principal, and Title II Coordinator monitors all compliance with Title II by reviewing master schedules and certifications, monitoring compliance agreements and teacher quality.

### **MONITORING OF TITLE III-A (when applicable)**

**At this time, the Jefferson County School System does not receive any Title III funds.** When applicable, Title III is monitored by the ESOL Coordinator, ESOL teachers, and building principals. The coordinator monitors the program through meetings, informal walk-throughs, monitoring of students that are monitored or opted out, and by reviewing academic progress.

- Calendar
- Meetings
- Teacher notification
- Monitor forms
- E-mails

### **MONITORING OF SCHOOL IMPROVEMENT/SCHOOLWIDE PLANS**

#### **Planning Process**

The planning process for the next FY includes an annual review, needs assessment, budget and school improvement plan/schoolwide plan. School meetings with the Superintendent and all the appropriate Federal Program Directors are held to review the planning process, provide technical assistance to the schools and finally, approve the plan. Building principals will meet with the School Improvement Team and other stakeholders to ensure that all building level needs are addressed in school wide plans. Artifacts include:

- Annual Review (January/February) – All school data is reviewed during this process
- Needs Assessment (February/March)
- Budgets (March)
- School Improvement Plan/Schoolwide Plan (March/April)
- Meetings (March/April)
- Documents are finalized based on State Assessments (August-October)
- Community Stakeholder and parent input meetings and surveys (throughout the school year)

### **SCHOOL IMPROVEMENT 1003 (SIG)**

The Jefferson County School System does not receive Rural and Low Income fund School Improvement 1003(g) funds. Policies and procedures will be put in place if the district becomes a grantee.

### **TITLE IX, PART A-MCKINNEY-VENTO ACT**

#### **Purpose of McKinney-Vento**

The McKinney-Vento program is designed to address the problems that homeless children and youth have faced in enrolling, attending, and succeeding in school. Under this program, local and state education agencies must ensure that each homeless child and youth has equal access to the same free, appropriate public education as other children and youth. Homeless children and youth should have access to the educational and other services that they need to enable them to meet the same challenging state student academic achievement standards to which all students are held.

#### **Homeless Children and Youth Defined**

“Homeless children and youth” are defined by the McKinney-Vento Act as those individuals who lack a fixed, regular, and adequate nighttime residence. The term includes children and youth who are:

- Sharing the housing of other persons due to loss of housing, economic hardship, or a similar reason (sometimes referred to as *doubled-up*)
- Living in motels, hotels, trailer parks, or camping grounds due to lack of alternative adequate accommodations
- Living in emergency or transitional shelters
- Abandoned in hospitals
- Awaiting foster care placement
- Children and youth who have a primary nighttime residence that is a public or private place not designed for, or ordinarily used as, a regular sleeping accommodation for human beings
- Children and youth who are living in cars, parks, public spaces, abandoned buildings, substandard housing, bus or train stations, or similar settings
- Migratory children who qualify as homeless because they are living in circumstances as described above.

### **Identification**

In collaboration with school personnel and community organizations, the liaison will identify children and youth in transition in the district, both in and out of school. The liaison will train school personnel on possible indicators of homelessness, sensitivity in identifying families and youth in transition, and procedures for forwarding information indicating homelessness to the liaison. The liaison will also instruct school registrars and secretaries to inquire about possible homelessness upon the enrollment and withdrawal of every student, and to forward information indicating homelessness to the liaison.

### **School Selection/School of Origin**

Homeless children and youth frequently move, and maintaining a stable school environment is critical to their success in school. To ensure this stability, LEAs must make school placement determinations based on the “best interest” of the child. The Jefferson County Board of Education will make every effort to maintain the child’s school of origin for the duration of homelessness when a family becomes homeless between academic years or during an academic year or for the remainder of the academic year. The school social worker will work with the family to complete related paperwork for the transportation department that will ensure a student’s ability to remain at the school of origin through the remainder of the grade span or until the end of the academic year in which permanent residency can be obtained.

### **Role of Personnel working with Homeless Children and Youth**

#### **Role of the Homeless Liaison/School Social Worker**

The local liaison serves as one of the primary contacts between homeless families and school staff, district personnel, and other service providers. The liaison coordinates services to ensure that homeless children and youth enroll in school and have the opportunity to succeed academically. The liaison helps to ensure that parents and guardians are informed of educational and related opportunities available to their children and that they are fully informed of all transportation services, including transportation to and from the school of origin, and of nutrition services, including eligibility for free lunch.

The homeless liaison/social worker will follow-up with the family and will help with the enrollment process. The homeless liaison/school social worker will assist families by:

- Working with school staff to make sure that homeless children and youth are immediately enrolled in school
- Work with families to complete transportation information to be submitted to the transportation department for students electing to remain at the school of origin
- Inform parents that all Jefferson County students are eligible for free breakfast and lunch

- Informing parents, school personnel, and others of the rights of homeless children and youth
- Help to coordinate and inform families of community and school agencies

### **Role of School Administration with Homeless**

Upon receiving notification of a student(s) that is potentially homeless, recognize that the student information should remain confidential, as defined by FERPA. Treat the family with respect, understanding the difficulty of the situation. The principal or his/her designee should:

- Greet the family and welcome them to Jefferson County and/or the school
- Contact the county homeless liaison/school social worker who will assist the families with the enrollment process

### **Role of the School Counselor with Homeless**

The school counselor plays a vital role in helping students and families cope with changes associated with homelessness. The school counselor should be available to greet families and help ease the transition to the new school setting, when applicable. The school counselor should work with the school social worker to aid students in getting required school supplies

### **Community Services and Agencies**

The school social worker maintains a list of community services and agencies that can help families in need in the area of food, clothing, shelter, and payment of basic utilities. Families in need should be referred to the school counselor. The school counselor will contact the school social worker for follow-up.

### **Enrollment Procedures**

The Jefferson County School System will immediately enroll any child or youth in transition. Enrollment will not be denied or delayed due to the lack of any document normally required for enrollment.

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

1. Enrolling families should be greeted cordially by the front office staff and school administrative staff
2. The homeless liaison/school social worker should be notified immediately by the office staff of an enrolling family that may qualify as homeless.
3. The homeless liaison/school social worker will contact the enrolling family and provide assistance with completing the necessary documentation for validation of homelessness and school enrollment.
4. The homeless liaison/school social worker will provide the enrolling family with contact information and the Homeless Informational pamphlet and community resources.
5. The school clerk/secretary will code students with the appropriate environmental code and primary night time resident code.

### **Transportation Procedures**

Transportation will be provided for the entire time the child or youth has a right to attend school, including during the pendency of disputes. The liaison shall request transportation to and from the school of origin or what is best for the child or youth. The length of the commute will only be considered in determining the feasibility of placement in the school of origin based on potential harm to the student.

1. The homeless liaison/school social worker will assist families who request transportation services to and from school.
2. The transportation department will arrange necessary bussing and inform the homeless liaison/school social worker of bus route and number information.

### **Dispute Procedures**

Upon receipt of complaints, the Federal Program Director will meet with a committee and review the complaint. All efforts will be made to ensure that policy guidelines have been followed. If a dispute arises over any issue covered in the Homeless policy, the child or youth in transition shall be admitted to the school in which enrollment is sought, pending final resolution of the dispute. The committee will render a decision and forward the written decision to the complainant within 10 days. The complainant may appeal the decision to the Superintendent of Jefferson County Schools.

### **MONITORING OF TITLE I-D: SERVICES FOR NEGLECTED & DELINQUENT CHILDREN (NEGLECTED SET-ASIDE)**

The Title I Director serves as the Neglected and Delinquent contact. The Title I Director follows the neglected and delinquent procedures based on the training provided by the Georgia Department of Education.

Jefferson County has no Neglected and Delinquent facilities. The Title I Director completes the annual Neglected and Delinquent survey each fall on the CONAPP. In the event that a Neglected and Delinquent facility is established, then the Jefferson County School System will follow the guidelines set forth by the Georgia Department of Education.

### **MONITORING OF TITLE I, PART C MIGRANT EDUCATION PROGRAM SERVICES**

The Jefferson County School System is part of the migrant consortium and receives services for migrant students from a partnership with Abraham Baldwin Agricultural College (ABAC). Additionally, the Jefferson County School System will provide services to eligible migrant participants including advocacy, outreach services, other education, health nutrition and social services. Services for all migrant children will be documented in coordination with GaDOE Regional MEP Office.

The Title IC coordinator will monitor the GADOE portal for consistent updates regarding the status and enrollment of students in the migrant program. The Title IC coordinator will also monitor the student information system to ensure that if migrant students enroll in the district, they will receive services. The Jefferson County School System takes the following steps to ensure the identification of eligible students:

- All parents complete the Occupational Survey Form as part of the registration process.
- Student Services refers any potential migrant students to the MEP Recruiter.
- If the recruiter determines that a child meets the migrant criteria, the Title IC coordinator will refer the application to the Migrant Education Agency serving the district.

If the Migrant Education Agency identifies a student as migrant, they will be served in Jefferson County Schools by ABAC. The Jefferson County School System's status as a member of the migrant consortium means that its budget is controlled by the GADOE migrant consortium. Any purchases necessary to meet the needs of migrant students will be made through consortium purchase procedures. Identified migrant students will be coded in the student information system by Title IC Coordinator.

### **MONITORING OF TITLE IV, PART A**

The Every Student Succeeds Act (2015) reauthorized the Elementary and Secondary Education Act of 1965. ESSA created the Student Support and Academic Enrichment program, commonly referred to as Title IV, Part A. The program provides flexibility for LEAs to tailor investments based on identified needs. LEAs create activities aligned to one of three focus areas:

- Well-Rounded Education Supports activities related to core academic subjects, foreign language, fine arts, health and physical education, and career and technical education.

- Safe and Healthy Students Supports activities related to creating safe and supportive learning environments for students. Popular strategies include PBIS, family and community engagement, and mental and physical health initiatives.
- Effective Use of Technology Supports activities related to staff development in STEM subjects, the creation of blended and remote learning programs, and the use of student data to differentiate instruction.

The five methods of prioritization of Title IV-A funds are:

- Provide funding to schools with the greatest needs
- Target schools with the highest percentages or numbers of low-income children
- Comprehensive support and improvement status
- Targeted support and improvement status
- Identification as persistently dangerous public elementary or secondary public school

Evidence gathered for the plan should demonstrate how current Title IV-A programming aligns with the needs and priorities set forth in the CLIP.

All expenditures follow the explained budgeting guidelines in this procedures manual, and are assessed in the same manner of protocol as all other requests by being deemed necessary through on-site monitoring and receiving approval by the Title I Director before being allocated in the budget plans.

### **MONITORING OF TITLE V, PART B - RURAL AND LOW-INCOME SCHOOLS PROGRAM**

The Title I Director in Jefferson County oversees Title V, Part B which is under the Rural and Low-Income Schools Program (RLIS). The RLIS program is an initiative that provides grant funds to rural LEAs that serve concentrations of children from low-income families. An LEA is eligible to receive funds under the RLIS program if:

- 20-percent or more of the children age 5 to 17 served by the LEA are from families with incomes below the poverty line.
- All schools served by the LEA have a school locale code of 32, 33, 41, 42, or 43, as determined by the Secretary of Education. Eligible systems apply for the RLIS funds through the consolidated application.

Use of Funds An eligible LEA may use RLIS funds for:

- Activities authorized under Title I, Part A.
- Activities authorized under Title II, Part A.
- Activities authorized under Title III.
- Activities authorized under Title IV, Part A.
- Parent engagement activities.

All expenditures follow the explained budgeting guidelines in this procedures manual, and are assessed in the same manner of protocol as all other requests by being deemed necessary through on-site monitoring and receiving approval by the Title I Director before being allocated in the budget plans.

### **MONITORING OF IDEA**

IDEA Rules of General Supervision mandates that the content and performance standards for Students with disabilities reflect the same expectations generally held for all children. School reform is encouraged to support schoolwide projects. IDEA 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. This includes monitoring student progress, supports and services. The Georgia Department of Education requires that the Jefferson County School System monitor the implementation of IDEA programs and the expenditure of all funds associated with the program.

JCSS's Special Education Director, as well as the Assistant Superintendent of Student Services, monitors schools implementation of Federal mandates and state rules through observation and review of documentation. Technical assistance is provided to schools that can assist in improving student academic achievement, behavior, and inclusion with non-disabled peers. The program ensures that all state and district requirements are carried out in accordance with federal, state and local guidelines. The Special Education Director monitors:

- Implementation of Pre-Referral Process
- Referral, Evaluation, Eligibility, and Placement Process
- Purchases and Expenditures
- Plans
- Student Performance
- Targeted Technical Assistance and Professional Development

The Special Education Department includes the Director, School Psychologist/Psychometrist and Data Specialist. The department shares responsibility for monitoring various components of IDEA 2004 in order to ensure compliance. School principals are also made aware of all IDEA procedures and are expected to monitor the programs in their school.

### **Monitoring of Pre-Referral Process**

The Director of Special Education serves as a consultant on school-level Student Support Teams. Prior to a referral for Psychological Evaluation for consideration of special education services, the Director is invited to attend the Student Support Team meeting to review tiered interventions and progress monitoring of the impact of those interventions on the student's performance.

Recommendations may be made for continued support in Tier 3 of the Pyramid of Interventions or the referral for evaluation is received.

### **Monitoring of referrals, evaluations, eligibility, and placement process**

The Director of Special Education receives all referrals from all sources including schools, doctors, parents, etc. Documentation is reviewed and referral is recorded in referral logs and timeline determined. Evaluator is assigned by the Director. Once evaluations are completed, reports are reviewed and eligibility meetings are scheduled. The Director attends all initial eligibility meetings, re-eligibility meetings, if formal psychological is performed, as well as meetings for students who are scheduled to transition from one organizational level to the next, elementary to middle, middle to high school, or graduation.

### **Monitoring of Purchases and Expenditures**

The Director of Special Education receives, reviews, approves (or denies), and completes all purchase orders submitted by a special education teacher and approved by the school principal that is requested from IDEA Flow-Thru or Federal Preschool Handicapped Funds. Requests for travel, professional leave, and field trips must be submitted to the Director for prior approval also. Expenditure reports generated by the financial office are also reviewed monthly.

### **Monitoring of Student Success and CEIS Plans**

The Director of Special Education serves as the facilitator in the development, review, and revision of all district-level continuous improvement plans relating to students with disabilities and disproportionality

determinations. Team meetings to assess the implementation of the plans, their impact on student achievement and/or performance and any revisions are scheduled by the director. Review of student data is conducted at each school during the fall, mid-year, and end of year district administration-led data digs.

**Student Performance**

The Director of Special Education participates in all district-level data digs held at each school that are scheduled by the Superintendent. Data includes state and local assessment results, benchmark assessment results from academic interventions and discipline data. Special Education teachers are required to complete progress monitoring intervention reports at the midpoint of each grade reporting period.

**Targeted Technical Assistance and Professional Development**

The Director of Special Education consults with the Superintendent, Directors of district-level programs, principals and teachers in order to identify, secure and/or provide any targeted technical assistance needed by special education staff. Needs assessments are performed each year at the end-of-year data digs in order to identify any areas of need.

**Jefferson County IDEA Yearly Timeline Monitoring**

<b>July</b>	Revise <b>Comprehensive LEA Improvement Plan</b> (CLIP) <ul style="list-style-type: none"> <li>Review SIPs / DSP (District Strategic Plan)</li> </ul> Review / revise written Federal Programs guidelines and timeline  Hold Consultation Meetings with Private Schools  Advertise and hold the Stakeholders meeting to review Student Success Plan <ul style="list-style-type: none"> <li>Procedures / guidelines review</li> <li>Timeline review</li> <li>Revise plan</li> </ul>
<b>August</b>	<ul style="list-style-type: none"> <li>Revise Comprehensive LEA Student Success Plan</li> <li>Technical Assistance workshops (Due Process, GOIEP)</li> <li>Monitor progress with student support, schedules, services</li> <li>Review student enrollment numbers</li> </ul>
<b>September</b>	<ul style="list-style-type: none"> <li>Review Student Success Plan</li> <li>Review list of IDEA personnel and schedule</li> <li>Review budgets for Flow Thru, Federal Pre-school and State Pre-School Handicapped</li> <li>Conduct Child Find with all four-year olds (Public and private schools, HeadStart)</li> <li>Review IEP/Re-Eligibility meeting schedules for the school year in order to meet timelines</li> </ul>
<b>October</b>	<ul style="list-style-type: none"> <li>Completion reports due (Grants Accounting Online Reporting System (GAORS))</li> <li>Complete budgets based on program and individual student needs, Supports and Services, and Improvement Plans</li> <li>Review student services in preparation for October FTE count</li> <li>Attend Fall Data Digs at each school</li> <li>Attend Cross functional monitoring Training (if required)</li> </ul>
<b>November</b>	<ul style="list-style-type: none"> <li>Review expenditures</li> <li>Review Discipline Data</li> </ul>
<b>December</b>	<ul style="list-style-type: none"> <li>Align budget and expenditures</li> </ul>



<b>January</b>	<ul style="list-style-type: none"> <li>● Obtain Periodic Certification Statements (after mid-year complete)</li> <li>● Review budget for amendments and carryover funds</li> <li>● Submit amendment if necessary.</li> </ul>
<b>February</b>	<ul style="list-style-type: none"> <li>● Attend GADOE district consortium “Directors’ Retreat</li> <li>● Attend mid-year Data Digs at each school</li> </ul>
<b>March</b>	<ul style="list-style-type: none"> <li>● Review of district and school FTE data</li> <li>● Align with budget and expenditures</li> <li>● Review GAA portfolios for pre-submission</li> </ul>
<b>April</b>	<ul style="list-style-type: none"> <li>● Review of district and school student data for projections of service needs for the next school year</li> <li>● Conduct Extended Year Service Needs</li> </ul>
<b>May</b>	<ul style="list-style-type: none"> <li>● Review alignment with budget and expenditures</li> <li>● Deadline for Amendments</li> <li>● Secure <u>Periodic Certification Statements</u>.</li> <li>● Schedule data digs to review EOY data</li> </ul>
<b>June</b>	<ul style="list-style-type: none"> <li>● Federal Programs Training (conference)</li> </ul>

## MONITORING OF CARES, CSSRA ACT, AND ARP ACT

### CARES

The Coronavirus Aid, Relief, and Economic Security (CARES) Act was passed by Congress and signed into law by President Trump on March 27, 2020. The funding provides flexibility for states to respond to the COVID-19 emergency in K-12 schools. Funds to local school districts may be used for coronavirus response activities, such as planning for and coordinating during long-term school closures, purchasing educational technology to support online learning for all students, and additional activities authorized by federal elementary and secondary education laws.

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

All expenditures follow the explained budgeting guidelines in this procedures manual, and are assessed in the same manner of protocol as all other requests by being deemed necessary through on-site monitoring and receiving approval by the appointed ESSER Director before being allocated in the budget plans; **however, the ESSER funding is not subject to the Supplement Not Supplant guidelines.** Since the CARES Act is unique and was brought about from unusual and catastrophic circumstances, the Jefferson County School System is relying heavily on the Georgia Department of Education officials over CARES, CRSSA, and ARP as well as the state ombudsman, the state DOE facilities department, and DOE Financial Review department to guide us through this process.

### CRSSA Act

The Coronavirus Response and Relief Supplemental Appropriation (CRRSA) Act signed into law by President Donald Trump on December 27, 2020, provides an additional \$54.3 billion for an ESSER II fund. Following the same distribution as the CARES Act, which is based on the share of ESEA Title I, Part A funds follow the same use for coronavirus-response activities. Planning for and coordinating activities that address learning loss, preparing schools for reopening, testing, repairing, upgrading projects to improve air quality in school buildings, and additional activities authorized by federal elementary and secondary education laws are continually permitted.

All expenditures follow the explained budgeting guidelines in this procedures manual, and are assessed in the same manner of protocol as all other requests by being deemed necessary through on-site monitoring and receiving approval by the appointed ESSER Director before being allocated in the budget plans; **however, the ESSER funding is not subject to the Supplement Not Supplant guidelines.** Since the CRSSA Act is unique and was brought about from unusual and catastrophic circumstances, the Jefferson County School System is relying heavily on the Georgia Department of Education officials over CARES, CRSSA, and ARP as well as the state ombudsman, the state DOE facilities department, and DOE Financial Review department to guide us through this process.

### **ARP Act**

The American Rescue Plan (ARP )Act was signed into law by President Joe Biden on March 11, 2021, to speed up the United States recovery from the economic and health effects of the COVID-19 pandemic and the ongoing recession.

ARP ESSER funds will allow SEAs to take additional steps to safely reopen schools for in-person instruction and keep them open, and to address the disruptions to teaching and learning resulting from the pandemic. This includes using funds to enact appropriate measures to help schools to invest in mitigation strategies consistent with the Centers for Disease Control and Prevention's (CDC) Operational Strategy for K-12 Schools to the greatest extent practicable; address the many impacts of COVID-19 on students, including from interrupted instruction; implement strategies to meet students' social, emotional, mental health, and academic needs; offer crucial summer, afterschool, and other extended learning and enrichment programs; support early childhood education; invest in staff capacity; and avoid devastating layoffs at this critical moment, ensuring that all students have access to teachers, counselors, and other school personnel to support their needs.

All expenditures follow the explained budgeting guidelines in this procedures manual, and are assessed in the same manner of protocol as all other requests by being deemed necessary through on-site monitoring and receiving approval by the appointed ESSER Director before being allocated in the budget plans; **however, the ESSER funding is not subject to the Supplement Not Supplant guidelines.** Since the ARP ESSER is unique and was brought about from unusual and catastrophic circumstances, the Jefferson County School System is relying heavily on the Georgia Department of Education officials over CARES, CRSSA, and ARP as well as the state ombudsman, the state DOE facilities department, and DOE Financial Review department to guide us through the process.

**Steps the LEA will use to monitor and provide technical assistance to the implementation of the ESSER grant:**

**Goal 1:** *Review the system’s ARP Plan at a minimum of every six months during the three years of ESSER funding and make revisions as needed based on stakeholder input and ongoing results of the Learning Loss Plan and the ongoing professional learning that addresses learning loss.*

<b>Timeline</b>	<b>Task</b>	<b>Participants</b>	<b>Outcomes/Artifacts</b>
Due in April and October	Review ARP Plan and budget - revised if needed	System Leadership Team	Updated Plan and Budget

Steps the LEA will use to monitor and provide technical assistance to the implementation of all ESSER grants:

- Develop the ARP ESSER III-LEA Application in June of 2021
- Submit the plan in July of 2021
- Review the plan a minimum of every six months, seek public input, and take such input into account in deciding whether to revise the plan, and make that plan public
- Ensure that the plan is in an understandable and uniform format and written in a language that parents can understand and/or provided in an alternative format accessible to parents.
- Collect data to determine student needs caused by learning loss opportunities due to COVID-19
- Analyze the data as to strength and challenge
- Review current practices that already address learning loss
- Determine what data to know the system is being successful in addressing learning loss
- Collect and analyze data to identify ongoing needs
- Use the Learning Loss plan to guide implementation

**The school system has determined to use the profession learning that is designed to cover the next three years as the most efficient and meaningful way to monitor the implementation of the ESSER Grants to insure that learning loss is addressed and covers a minimum of the three years of the ESSER funding:**

**Year one: Addressing Academic Gaps K-12 1.0 (Started June 2021)**  
Addressing Academic Gaps Early Learning 1.0 Pre-K

**Year two: Addressing Academic Gaps K-12 2.0 (Starts June 2022)**  
Addressing Academic Gaps Early Learning 2.0 (Starts June 2022) Pre-K

**Year three: Addressing Academic Gaps K-12 3.0 (Starts June 2023)**  
Addressing Academic Gaps Early Learning 3.0 Pre-K

**Goal 2:** *Create a process for reviewing the curriculum using student data to develop a clear understanding of the needs of students at each grade level and to determine the curricular changes needed to support student growth in light of the learning loss experienced during Covid-19.*

Timeline for Year 1

Timeline	Task	Participants	Outcome/Artifacts
Spring 2021 2 Days	Building a Curriculum Process	District Leadership Team School Leadership Team (optional) CSRA RESA Team	*Portrait of a Jefferson County Graduate *Data/Assessment List *Templates for Curriculum *Project Benchmarks
Summer 2021 5 Days (Large Group)  6/14-18  2 Days (Small Group)	Curriculum Review: Using Student Data to Update the Curriculum  Curriculum Mapping and Grade Level Expectations  Formative Assessment Development  Review and Editing	District Leadership Team School Leadership Teams Teachers CSRA RESA Team  Teacher Leadership and Coaches	*Data Analysis Findings *Curriculum Map for each course *Prioritized Standards *Grade Level/Course Expectations *Sample Formative Assessments *Authentic Tasks List  *Final Plans for Publishing
Fall/Winter 2021-22	Developing Unit Plans to Guide Instruction – Part 1	School Leadership Teams Teachers CSRA RESA Team	*Unit Plans developed by grade level/course *List of aligned instructional materials and practices (including field trips) to the curriculum *Identify key vocabulary and literacy strategies

<p>Fall/Winter 2021-22:</p> <p>9/29 10/14 2/8 2/10</p>	<p>Instructional Rounds-Focus: Productive Feedback &amp; Student Engagement</p> <p>9/29: JCMS and JCHS 10/14: CES, LA, WES 2/8: JCHS 2/10: JCMS</p>	<p>District Leadership Team School Leadership Teams Teachers CSRA RESA Team</p>	<p>*ELEOT Observation Tool to determine Instructional Rounds Focus: Student Engagement &amp; Productive Feedback</p> <p>*Used SEE-KS Reference Tool for analysis of '3i's' of Engagement in Classrooms</p> <p>*Used Productive Feedback organizer(from RESA) to analyze type and effectiveness of feedback</p> <p>*Debriefings between rounds provided evidence or lack of evidence in student engagement</p> <p>*Debriefings between rounds provided opportunity to identify components of productive feedback observed in classes</p>
<p>Fall/Winter 2021-22:</p> <p>9/7 10/19 1/5 2/22 3/22</p>	<p>Professional Learning: Collaborative Planning of lessons for Units to Guide Instruction</p> <p>On-going Mini-Sessions: Clarity, Learning Intentions, Success Criteria, Collaborative Planning, Effective Feedback, Active Learning</p>	<p>District Leadership Team School Leadership Teams Teachers CSRA RESA Team</p>	<p>*Unit Plans developed by grade level/course</p> <p>*List of aligned instructional materials and practices (including field trips) to the curriculum</p> <p>*Identify key vocabulary and literacy strategies</p> <p>*Collaboratively developed lesson plans to support Unit Plans</p>
<p>Spring 2022 1 Day: 6/1</p>	<p>Curriculum Planning Process</p>	<p>District Leadership Team School Leadership Teams CSRA RESA Team</p>	<p>*Updated Project Benchmarks</p> <p>*Sample Unit Plans and Formative Assessments</p>
<p>Summer 2022 2 Days: 6/ 6-7</p>	<p>Developing Unit Plans to Guide Instruction – Part 2</p>	<p>District Leadership Team School Leadership Teams Teachers CSRA RESA Team</p>	<p>*Revised Unit Plans</p> <p>*Revised Formative Assessments</p> <p>*Revised Unit Tasks</p>

Observation dates are highlighted in yellow

- Professional Learning dates for the continuation of this project were as follows:
- Sept. 7, 2021
- Oct. 19, 2021
- January 5, 2022

- Feb. 22, 2022
- March 22, 2022

Documentation has been kept for all the instructional rounds as well as the professional learning dates.

**List of documentation that will be maintained to verify the ESSER grant have been monitored**

Agendas  
 Sign-in sheets  
 ARP Application  
 Maintenance of Equity documentation  
 Six-month review documentation  
 Approved budgets vs. expenditures  
 Revised Unit Plans  
 Revised Formative Assessments  
 Project Benchmarks  
 Prioritized Standards  
 List of aligned instructional materials  
 Benchmark Data (BOY, MOY, EOY)

**For Instructional Rounds at Schools:**

ELEOT Observation Tool to determine Instructional Rounds Focus: Student Engagement & Productive Feedback  
 Used SEE-KS Reference Tool for analysis of ‘3i’s’ of Engagement in Classrooms  
 Used Productive Feedback organizer (from RESA) to analyze type and effectiveness of feedback  
 Debriefings between rounds provided evidence or lack of evidence in student engagement  
 Debriefings between rounds provided opportunity to identify components of productive feedback observed in classes  
 Observations of CARES funded teachers (class size reduction and intervention) at CES, LA, WES, and JCMS

**For after school programs:**

Time sheets  
 Bus route sign in sheets  
 Formative assessments  
 BOY, MOY, EOY benchmarks  
 Milestones

**Goal 3:** *Ensure schools and LEAs serving large proportions of historically underserved groups of students receive an equitable share of State and local funds as the Nation continues to respond to the COVID-19 pandemic’s impact.*

**Monitoring of Maintenance of Equity - ESSER**

<b>Timeline</b>	<b>Task</b>	<b>Participants</b>	<b>Outcomes/Artifacts</b>
Annually - due in October (or more often if instructed to do so)	Calculate and submit Maintenance of Equity	CFO	Fiscal and staffing equity

**Maintenance of Equity**

**American Rescue Plan (ARP) Act LEA Maintenance of Equity Requirement**

The Maintenance of Equity provision of ARP ensures that schools and LEAs serving large proportions of historically underserved groups of students—receive an equitable share of State and local funds as the Nation continues to respond to the COVID-19 pandemic’s impact. The Jefferson County School System does not meet any of the available exceptions and will therefore calculate and submit Maintenance of Equity at least annually or more often if instructed to do so.

The CFO will use the following data sources to populate both the fiscal equity and staffing equity tabs of the Maintenance of Equity worksheet provided by GaDOE:

CPI – 1 adhoc reporting exports

FTE – 1 FT002 System Enrollment

FTE – 1 FT002 System Enrollment by school

Current year budget

Prior year actuals

**Positions responsible for implementing and monitoring the ESSER grants:**

Title I Director and the CFO

**NEEDED CORRECTIVE ACTION AT SCHOOLS- ESSER**

Should corrective action be required as a result of ongoing monitoring, schools will receive a verbal request with written follow-up from the ESSER designee. Any formal corrective action should be completed immediately and by the due date given. Corrective action will be submitted to the ESSER designee and written verification stating completion will then be returned to the school for record-keeping. District corrective action plans will be completed by the appropriate Federal Programs Director and approved by the superintendent.

Corrective action from previous monitoring is discussed with principals in order to assist them in understanding the critical need for compliance with ESSER. In addition, GaDOE monitoring findings from all districts are shared with principals or staff as a means of understanding the impact of non-compliance. Professional learning is provided based on the needs but, in addition, professional learning is used as a preventive measure to ensure that all staff have a clear understanding of all expectations of every facet of the ESSER program.

If corrective action is needed based on any monitoring, the ESSER designee will communicate to the appropriate staff member(s) the issue in writing or through a meeting and steps for resolution (if applicable). The ESSER designee will ensure that the proper documentation is maintained regarding the incident, the incident is corrected and additional training is provided as needed.

### **FOLLOW-UP/VERIFICATION OF CORRECTIVE ACTIONS - ESSER**

Through Administrators' meetings, technical assistance meetings, Academic Interventionists meetings, site visits, e-mails, and phone calls, technical assistance is provided to schools on all ESSER requirements. At the Administrators' meetings, principals are provided information and details as they become available. Principals are encouraged to contact the appropriate ESSER designee with questions at any time.

### **SECTION 2: COMPREHENSIVE LEA IMPROVEMENT PLAN (CLIP)**

Section 1112 of the Title I, Part A Elementary and Secondary Act (ESEA) of 1965 specifies that LEAs may receive funds under ESEA if the LEA has an approved plan on file with GaDOE. The LEA plan is submitted as part of a Consolidated Application under Section 9305 of ESEA. The three-year CLIP has three major components:

- ESEA/IDEA Plan Descriptors
- System Profile
- LEA Implementation Plan

The following programs are a part of the CLIP (when applicable):

- Title I, Part A
- School Improvement 1003
- School Improvement 1003 (SIG)
- Title I, Part C
- Title I, Part D
- Title II, Part A
- Title III, Part A
- Title IV, Part A
- Title V, Part B
- Title IX, Part A-McKinney-Vento Act
- IDEA
- CARES/CRRSA/ARP

The Jefferson County School System (JCS) updates the CLIP annually. The following process and timeline is followed:

- The federal program directors/coordinators participate in the GaDOE CLIP webinar
- February/April - Needs Assessments are completed by schools.
- February/March - Federal Programs Surveys for Parents, Staff, and Community members are administered.
- April - The federal program coordinators along with key district personnel meet to discuss required changes to the CLIP and the review process.
- April - The federal program directors and the principals review the results of the Federal Programs Surveys for Parents, Staff, and Community members and analyze results as part of the needs assessments for the district and schools.
- April -Needs assessment results are used to prioritize needs for the coming year.



- April/May - CLIP revisions are made by the various Directors of Federal Programs.
- May - The CLIP is shared with principals and school staff for input and revisions.
- Principals will provide meeting agendas, sign-in sheets, and feedback documents to the appropriate Federal Programs Director.
- May- Revisions to the plan are completed by the appropriate Federal Programs Director.
- June/July -The CLIP is shared with parents, students and community members. Opportunities are offered to gather input. Parent and community members are sent information inviting them to participate via email, telephone, website, and the local newspaper. (Due to high COVID numbers, the June/July meetings were not held in 2020 or 2021. The results of the 2020-2021 Federal Parent Survey were used as part of the stakeholder input for the CLIP and SIPs for 2021-2022.)
- July - Final revisions to the plan are completed by the appropriate Federal Programs Director
- July -The plan is submitted to the superintendent for final approval before submission to the GaDOE. Documents will be reviewed to ensure that teachers, parents, and other stakeholders were provided an opportunity to be involved in the revision of the CLIP.
- July -Superintendent and appropriate Federal Program Director will review submission dates and documentation to ensure that the Comprehensive LEA Improvement Plan (CLIP) is periodically reviewed, evaluated, and revised annually. Documentation includes notices, sign-in sheets, agendas, meeting minutes, emails and returned feedback.

**Evidence-based interventions** are required for federally funded activities. The term *evidence-based*, when used with respect to a state, local educational agency, or school activity, means an activity, strategy, or intervention that demonstrates a statistically significant effect on improving student outcomes or other relevant outcomes based on:

- strong evidence from at least one well-designed and well-implemented experimental study;
- moderate evidence from at least one well-designed and well-implemented quasi experimental study;
- promising evidence from at least one well-designed and well-implemented correlational study with statistical controls for selection bias; or demonstrates a rationale based on high quality research findings or positive evaluation that such activity, strategy, or intervention is likely to improve student outcomes or other relevant outcomes and includes ongoing efforts to examine the effects of such activity, strategy, or intervention.

The respective federal programs director is responsible for identifying and submitting the appropriate evidence base prior to the submission of the CLIP. If sufficient research cannot be located, a logic model, to include the rationale for the activity and evidence to be collected to determine the impact of the activity, will be developed. The evidence level is recorded in the CLIP and/or School Improvement Plan submitted in the Statewide Longitudinal Data System (SLDS); a copy of the logic model or research base is maintained by program director/coordinator for documentation.

## **2.1: MONITORING OF SCHOOL IMPROVEMENT**

All five of the Jefferson County BOE schools are Title I schools. All Title I schools within the Jefferson County School System conduct Schoolwide Programs and develop a School Improvement/Schoolwide Plan.. This allows all children and all parents an opportunity to have equal access to all related Title I assistance. All schools within an LEA will be involved in school improvement efforts through the work of the LEA and GaDOE.

### **School Improvement/Schoolwide Program Plan Development**

School Improvement and Schoolwide Plans are updated each spring for the upcoming school year. Each school leadership team conducts spring meetings at which representatives from each grade level, content area, and department, as well as system and school administration and parents meet to develop a plan. During school leadership meetings, instructional strategies, parental involvement initiatives, and professional development activities are planned after a careful analysis of various data. Assistance is also provided to schools in their use of school improvement funds to accomplish initiatives in their school improvement and schoolwide plans. Additional assistance is also provided to TSI and PROMISE schools in their use of school improvement funds (if applicable) to accomplish initiatives in their school improvement and schoolwide plans.

School administrators then present their school plans to the Superintendent and the Federal Programs Directors in June and work with the central office staff to complete the CLIP and revisions to the system strategic plan which are all aligned. Final revisions of the School Improvement/Schoolwide Plans are due by August 1. The superintendent and the various Federal Program Directors work with each principal through the month of July to make revisions as needed.

The plans are monitored throughout the year in leadership meetings, quarterly data digs, school visits, classroom walk-throughs, and attendance at technical assistance and system- and school-level meetings. School Improvement/Schoolwide Plans may be modified or altered throughout the school year as specific needs arise with the guidance and approval of the appropriate Federal Program Director(s).

## **2.2: Resolution of Unapproved Plans**

If the GaDOE requests revisions, the Title I Director retrieves the requested changes from the Audit Trail in the GaDOE portal. The Title I Director then communicates with the appropriate school or district based personnel to ensure that requested changes are submitted to the Title I Director. The Title I Director provides technical assistance as appropriate, makes corrections and/or approves corrections in the CLIP, and then resubmits the CLIP. This process is continued until the system's CLIP has been approved by GaDOE.

## **SECTION 3: SERVICES TO ELIGIBLE PRIVATE SCHOOL CHILDREN**

Letters to private schools must be sent each year. The Director of the related Federal Program checks the Georgia Department of Education website annually for the sample private school letter to ensure that all of the appropriate information is included on the letter. Although the Jefferson County School System does not receive Migrant (Title I, Part C) funds directly, the district is part of a consortium that will serve migrant students identified by the Occupation Survey and verified by our Migrant Agency. The system does not receive Title III-A or Title IV-B funds at the present.

The Title I Director makes a list of all private schools serving students who are zoned to attend schools in Jefferson County. This information is obtained from the DE1111 forms submitted by all private schools that serve students who reside in Jefferson County. The Title I Director sends emails through the ES4PS platform to all private schools within the county as well as to those outside the county who have students zoned to attend schools in Jefferson County. The invitation to the private schools includes the following programs:

- **For Title I, Part A LEAs must invite private schools (located within or outside of the LEA and the state) with students residing within the LEA's geographical boundaries.**
- **For Title VIII (Title I, Part C; Title II, Part A, **Title III, Part A**, Title IV, Part A), LEAs must invite private schools located in the LEA's geographical boundaries.**
- **For Title VIII (**Title IV, Part B**), LEAs and Community-Based Organizations must invite private schools located in the geographical boundaries of the attendance area served by the grant program.**

***Jefferson County does not receive Title III-A or Title IV-B funds at the present time.***

*Private School letters for CARES/ARP will follow the timeline from the GaDOE.*

### **Individuals with Disabilities Education Act (IDEA)**

In accordance with IDEA regulation § 300.131, each LEA must annually locate, identify, and evaluate all children aged 3-21 with disabilities who are enrolled by their parents in private, including non-profit religious, elementary schools and secondary schools located in the school district served by the LEA.

### **Timeline:**

- October: Emails will be sent through the ES4PS platform to all private schools with attending children residing in the Jefferson County School System.
- October/ November: Consultation with private schools for next fiscal year. Affirmation of consultation will be signed.
- December: The private school report will be reviewed to ensure all of the private schools were emailed in October. Any new private schools will be emailed and a second consultation will be held for the next fiscal year, if needed.
- January – May: If a private school wants to participate in a federal program, data will be gathered and plans will be determined for the next fiscal year.
- August: Begin services for the private school
- Ongoing: Consultation will be ongoing with the participating private school.
- Spring of the Year: Program evaluation and physical inventory will be completed at least every other year.

### **Consultation**

The Director of the related Federal Programs is responsible for ensuring that the required consultation occurs. The Federal Programs' Directors will coordinate the meeting date with all programs in the Jefferson County School System and send the letters to inform private schools of the consultation date and time. Private school officials may request an alternative date and time if needed. Agenda and minutes of the consultation will be kept by the related Federal Programs Director.

When a private school determines that the school would like to participate in Title I, Title II, Title III-C (consortium), or Title IV-A, the district will determine the allocation based on Title I, Title II, Title III-C (consortium) or Title IV-A guidelines. The following guidelines will ensure appropriate and equitable participation:

Private school students who are enrolled in nonprofit private elementary and secondary schools, including those in religiously affiliated schools, located in the LEA and/or where students attend outside the LEA generally are eligible to receive Title I, Part A services.

### **Identification of Participants**

The Jefferson County School Systems works closely with the private school to verify attendance of possible students (Department of Student Services).

The LEA will determine an accurate count of children from low-income families who attend public and private schools and reside in participating Title I public school attendance areas in order to allocate the proportional share. With respect to private school students, the ESEA permits an LEA, based on timely and meaningful consultation, to use one of the following:

1. The same measure of poverty used to count public school children

2. Comparable poverty data from a survey and allowing such survey results to be extrapolated if complete actual data are unavailable.
3. Comparable poverty data from a different source.
4. Proportionality
5. An equated measure.

### **Third Party Vendor**

Private schools may use a third party vendor to deliver services to students if agreed upon with the district.

### **Funds**

All materials and supplies purchased by the Jefferson County School System are the property of the district. At the time the private school no longer participates, the property will be returned to the LEA. All purchases are made on behalf of the private school.

### **Inventory**

An inventory will be maintained at the district. The technology department will do a physical inventory at least bi-annually.

### **Equipment**

Private schools will label Title I equipment in the same manner as the Title I schools. Private school staff will be trained on the proper means of ensuring that only Title I eligible students are allowed to use equipment and materials purchased by Title I. The private school will receive a copy of the GaDOE guidance on equipment usage.

If a private school is no longer participating in a federal program or if there is no longer a need for the equipment at the Private School, the Federal Programs Office will remove the equipment and place it in a Title I school that has a need for the equipment. Equipment will be removed immediately upon notification that the equipment is no longer needed or the private school is closing.

### **Complaints**

Complaints from private schools will be handled through the Jefferson County School System complaint process.

### **Evaluation**

If a private school chooses to participate in a federal fund, an evaluation will be set-up during the planning process. Modifications to the plan will be made during the year based on the evaluation method(s) if needed.

## **SECTION 4.1: MAINTENANCE OF EFFORT**

Documentation for Maintenance of Effort (MOE) is only required for districts that do not meet the required maintenance of effort. The district's MOE is completed by the GaDOE.

In the event the district does not meet the MOE, the JCS will pull the financial analysis reports for Fund 100 and complete the MOE worksheets for the two applicable fiscal years.

The Financial Analysis reports are verified by the Comptroller. These reports are also checked for accuracy during the annual financial audit.

## **SECTION 4.2: COMPARABILITY OF SERVICES**

**Procedures**

The Jefferson County School System will run Comparability in the Consolidated Application. If the school system is not comparable, the following procedures will be followed:

- The Title I Director will collect the following source documentation:  
CPI Report 12 and 13 (certified staff and non-certified staff) from the Comptroller after the report has been submitted to GaDOE (usually in October).  
The October FTE report from the Student Information Coordinator. Pre-K will not be counted in the report.

The director will strike through all staff that should not be counted in the comparability report. See table below for who to count and who not to count.

<b>Who to Count</b>	<b>Who Not to Count</b>
Instructional Staff	• Federally Paid Staff
• Core subject teachers	• Pre-K Staff (teachers and Parapros)
• Art teachers	• Privately Paid Staff
• Music teachers	• Lunchroom Staff
• Physical education teachers	• Custodian Staff
• Instructional paraprofessionals	• Nurses
• Guidance counselors	• Security Staff/Officers
• Speech Therapists	• Bus Drivers
• Media specialists	• Secretaries
• Services Provided by Staff that Support Instruction	• Clerical Staff
• School social workers	• Principals
• Psychologists	• Assist. Principals

- Make sure only to count portions of the staff that are split-funded or part-time.
- Count the staff numbers.
- Pull the latest Comparability Worksheet from the GaDOE website.
- Enter the data into the Comparability Worksheet.
- Upload the worksheet and supporting documentation into the Consolidated Application for GaDOE approval.
- Submit for superintendent’s signature.
- Submit to GaDOE area specialist for review.

**Timeline**

- October:  
Collect data necessary to demonstrate comparability.
- November -December:  
Run Title I Comparability Report as directed by GaDOE
- December 31:  
If all schools in the district are not comparable as of the October FTE, revise the report and submit by December 31 or the date agreed upon with the Title I Area Consultant.

## **SECTION 4.3: ASSESSMENT SECURITY**

### **Testing Program**

#### System-wide Standardized Testing Program

The Jefferson County School System recognizes that a system-wide testing program is directly related to student success. Information gained from testing supports the provision of differentiated instruction for students and acts as an accountability measure for the school system and its stakeholders. Therefore, the Jefferson County Schools will administer an annual system-wide testing program that will include tests required by Georgia statute as well as standardized tests that may be required by the school system's charter, federal program guidelines and local evaluation needs.

Test results will be used as follows:

- To assess the academic progress of individual students and at specified grade levels to satisfy the Georgia Department of Education promotion and diploma requirements for individual students – when it is not waived.
- To determine the strengths and weaknesses of the instructional program so that the instructional program can be improved.
- To provide individual scores to students and their parents or guardians.
- To provide student growth reports (for parents, students, and teachers) that chronicle a child's performance in certain content areas over years.
- To provide school and system scores to the community.

### **Test Administration**

In support of student success, the Jefferson County Schools shall implement the assessment program specified by the State Board of Education and the superintendent. The tests shall be administered in accordance with the requirements of the governing agency for the assessment and with a high level of security to ensure an appropriate testing environment, the integrity of the assessment and the accuracy of the data produced by the assessment. The test administration shall be conducted in such a way that prevents, mitigates and reports any irregularities arising at any time before, during or after testing.

### **Consequences**

Employees shall comply with all Jefferson County School policies, State Board of Education rules and Georgia Professional Standards Commission rules with regard to testing ethics. Employees who violate these provisions shall be subject to disciplinary action, up to and including termination.

### **Testing and Assessment Procedures**

The Jefferson County School System adheres to all written regulations and procedures relating to testing and test administration including the distribution and collection of test materials, test security, use of test results and official testing dates established in the Student Assessment Handbook, test administration manuals such as System Coordinator's Manual, School Test Coordinator's Manual, and Examiner's Manual, and assessment supplements and correspondence.

### **Training and Monitoring**

Prior to the main administration of state-mandated assessments, the system will provide training for school testing coordinators who will then train school level staff. Copies of agendas and attendance logs will be kept for all training sessions. Training will be based on Georgia Department of Education (GaDOE) guidance provided by the Georgia Student Assessment Program. Proper and necessary signatures that provide documentation of training and overview of materials will be collected.

System and school level administration will monitor assessment administration. Any irregularities will be reported to the system test coordinator for review in accordance with DOE guidelines.

### **Security**

The school system shall follow written procedures relating to testing, test administration (distribution and collection of test materials), test security, use of test results, testing dates, assessment supplements and correspondence from the Georgia Student Assessment Handbook and other guidance from the GaDOE.

- Identification information is accurate and that necessary coding/labeling is complete.
- Materials are returned from Examiners each day and proper documentation and an account is made for all materials distributed each day of testing.
- Packages and returns materials are given to the System Test Coordinator according to directions and timeline.
- School Test Coordinators will notify Principals and System Test Coordinator of any testing irregularities and provide explanation of circumstances.
- School Test Coordinators will maintain dated student sign-in/sign-out sheets for each Milestone administration.
- School test Coordinators will ensure that students have only one opportunity to test during each window.

### **Georgia Professional Standards Commission Consequences for Educators**

An educator shall administer state-mandated assessments fairly and ethically. Unethical conduct includes but is not limited to:

- committing any act that breaches Test Security; and
- compromising the integrity of the assessment.

The Professional Standards Commission is authorized to suspend, revoke, or deny certificates, to issue a reprimand or warning, or to monitor the educator's conduct and performance after an investigation is held and notice and opportunity for a hearing are provided to the certificate holder.

## **COMMUNICATION TO THE STAKEHOLDERS**

### **Internal Stakeholders**

Testing information and procedures will be communicated to internal stakeholders through:

- Training meetings for School Testing Coordinators
- Training meetings for all employees involved in the testing environment/process.

### **External Stakeholders**

Testing information and procedures will be communicated to external stakeholders through:

JCSS Website

Testing Calendar,

GA Milestone Practice Site - Online Assessment

GA Milestones Video

Other

- Georgia Standards that guide the testing profile
- Georgia Department of Education that answers all other questions related to testing

to include terms, definitions, policies, etc. Student Agenda -Testing Information

### **District/State Report Card**

**The Assistant Superintendent for Student Services and the system Technology Director are responsible for ensuring that the appropriate link for access to the system report card has been posted on the district and school websites and that the line for access to the school report cards have been posted on the appropriate school website.**

### **SECTION 5: INTERNAL CONTROLS, EXPENDITURES, INVENTORY, DRAWDOWNS, COST PRINCIPLES - ALL PROGRAMS**

The procedures outlined in Section 5 are applicable to all Federal Funds (including ESSER) except School Food. Additionally, “supplement versus supplant” does not apply to ESSER.

#### **Budget (Federal Funds)**

All stakeholders work to identify system needs and develop school and system improvement plans.

Program Directors work with regional and state consultants to fulfill program requirements including but not limited to CLIP, system strategic plan, school improvement and schoolwide plans, school allocations, etc.

Program Directors then utilize input from the school principals and direction from the appropriate Area Program Specialists to develop budgets of allowable costs for each federal grant that comply with all applicable federal regulations. The Program Director analyzes items being budgeted to insure that program goods and services will be supplemental and not supplant costs that would be required of the general fund.

Program Directors enter budgets in the Consolidated Application (ConApp). The Superintendent signs off on the budget which is then reviewed by Area Program Specialists. If revisions are necessary, the grant is rejected. Program Directors make changes indicated and submit again. This process continues until final approval is given.

- Once approved, Program Directors print approved budgets from the ConApp and give copies to the Purchasing Secretary and Comptroller.
- Purchasing Secretary enters approved budgets in PCGenesis (PCG).
- Purchasing Secretary periodically prints budget reports from PCG for Program Directors to review. Program Directors may request a budget report at any time. Program Directors review budget reports to monitor activity within the Federal Program and to identify any errors that may need correcting.
- Comptroller and/or Purchasing Secretary periodically prepares a budget report with salary and benefit accruals considered. Program Directors may request this calculation at any time.
- Program Directors enter budget amendments in the ConApp when necessary. The steps for approval and communication listed above are followed.
- Directors check to see that the expenditures adhere to the period of performance (27 months) and that expenses are incurred during the approved budget period (which is the fiscal year of the budget).



The procedures in this section are applicable to all Federal Title grants the district receives whether through formula or competitive means, all IDEA funds and any other federal funds the District may receive on occasion including but not limited to CARES, ESSER and ARP. Please note that “supplement not supplant” is not applicable to CARES/ESSER/ARP funds. This handbook is not used by School Nutrition.

Cash management internal controls represent an application of common sense and prudent conduct to the use and proper safeguarding of district assets. Proper internal control mechanisms provide management with a reasonable assurance that intended safeguards are being practiced consistently. Therefore, the integrity of any cash management activity depends on the application of internal control principles and standards.

### **Internal Controls and Segregation of Duties**

Jefferson County has compensating controls in place due to the limited number of staff available to adequately address separation of duties. The system uses compensating controls to mitigate errors and the risk of fraud.

Jefferson County will follow all policies and procedures to ensure the compliance with respect to the use of Federal Funds. Jefferson County uses a Financial Accounting System (PCG) that allows us to:

1. Provide the data necessary to prepare reports required by federal law.
2. Permit the tracing of funds to a level of expenditures adequate to demonstrate that the funds were used appropriately.
3. Maintain accurate, current, and complete financial information to facilitate financial reporting. This will show that the money was budgeted and spent in an allowable manner.
4. Generate records that adequately identify the source and application of funds (i.e., which particular grant the funds came from and how they were spent). These records should include information about award amounts, how much an entity is authorized to spend, how much was obligated, how much was spent, and the unobligated balance.
5. Maintains supporting documentation sufficient to verify the accuracy of their accounting records. Documents may include bank records, payroll records, paid bills, receipts, time-and-effort records, contracts, etc.
6. Has sufficient controls to ensure federal funds and properties purchased with federal funds are used only for authorized purposes.
7. Routinely compares the amount budgeted to the amount actually spent. This helps to monitor expenditures and ensure they are occurring as planned.
8. Implements controls to ensure all costs charged to federal funds are allowable and comply with federal cost principles set out in Office of Management and Budget Uniform Cost Principles and Audit Requirements for Federal Awards.

9. Requests only the amount of money required for immediate needs. The goal of cash management is to ensure entities do not keep federal funds on hand for long periods of time.

Segregation of duties is critical to effective internal control because it reduces the risk of mistakes and inappropriate actions. Adequate segregation of duties reduces the likelihood that errors both intentional and unintentional, will remain undetected by providing for separate processing by different individuals at various stages of a transaction and for independent reviews of the work performed.

The basic idea underlying segregation of duties is that no employee or group should be in a position both to perpetrate and to conceal errors or fraud in the normal course of their duties. In general, the principal incompatible duties to be segregated are:

Custody of assets

Authorization or approval of related transactions affecting those assets

Recording or reporting of related transactions

Execution of the transaction or transaction activity

No one person should:

Initiate a transaction

Approve a transaction

Record a transaction

Reconcile balances

Handle assets

Review Reports

Note: At least two sets of eyes are required for any transaction.

With our internal controls, we will be able to verify that the implementation of this award is conducted in an appropriate manner and to ensure that we avoid fraud and error.

**COST PRINCIPLES: REASONABLE, NECESSARY, ALLOCABLE AND ALLOWABLE**

**RAM/P**

Due to the fact that every school in Jefferson County is a Title I School (all schoolwide), the system does not use the RAM/P development; however, all local, state and federal funds are distributed fairly and equitably.

## **Allowability**

Any purchase made with federal funds must follow the guidelines for allowable costs. Jefferson County School System Federal Programs will follow guidelines as detailed in UGG, EDGAR, OMB Circulars (such as A-87), and the appropriate Federal Program Handbooks for Georgia. Federal purchases will also adhere to any memos, letters, and/or communication regarding allowable/unallowable purchases. Federal Program Directors will direct any questionable expense to their specific Program's GaDOE Area Program Specialist for further clarification. Federal Program Directors will weigh heavily the purpose and need of expending Federal funds during the budgeting process and throughout the year, considering the following elements when determining the allowability of a cost:

- Necessity and reasonableness for the performance of the Federal award and be allocable thereto under these principles.
- Conformity to any limitations or exclusions set forth in these principles or in the Federal award as to types or amount of cost items.
- Consistency with policies and procedures that apply uniformly to both federally-financed and other activities of the non-Federal entity.
- Exclusion as a cost or used to meet cost sharing or matching requirements of any other federally-financed program in either the current or a prior period.
- Adequate documentation.

## **Reasonable and Necessary use of Funds**

Federal expenditure of funds must meet the clause of "reasonable and necessary." When considering a purchase with federal funds, Federal Program Directors 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?

## **Conflict of Interest**

The employees and consultant of the District have the responsibility of administering the affairs of the District honestly and prudently, and of exercising their best care, skill, and judgment for the sole benefit of the District. Those persons shall exercise the utmost good faith in all transactions involved in their duties, and they shall not

use their positions with the school system or knowledge gained therefrom for their personal benefit. The interests of the organization must be the first priority in all decisions and actions.

Conflicts of interest may arise in the relations of directors, officers, and management employees with any of the following third parties:

1. Persons and firms supplying goods and services.
2. Persons and firms from whom the District leases property and equipment.
4. Competing or affinity organizations.
5. Donors and other supporters.
6. Agencies, organizations and associations which affect the operations of the District.
7. Family members, friends, and other employees.

A conflicting interest may be defined as an interest, direct or indirect, with any persons or firms mentioned above. Such an interest might arise through:

1. Owning stock or holding debt or other proprietary interests in any third party dealing with the District.
2. Holding office, serving on the board, participating in management, or being otherwise employed (or formerly employed) with any third party dealing with the District.
3. Receiving remuneration for services with respect to individual transactions involving the District.
4. Using time, personnel, equipment, supplies, or goodwill for other than District/Program-approved activities, programs, and purposes.
5. Receiving personal gifts or loans from third parties dealing or competing with the District. Receipt of any gift is disapproved except gifts of a value less than \$25, which could not be refused without discourtesy. No personal gift of money should ever be accepted.

The areas of conflicting interest listed above, and the relations in those areas which may give rise to conflict, as listed above, are not exhaustive. Conflicts might arise in other areas or through other relations. It is assumed that the directors, officers, and management employees will recognize such areas and relation by analogy. The fact that one of the interests described above does not necessarily mean that a conflict exists, or that the conflict, if it exists, is material enough to be of practical importance, or if material, that upon full disclosure of all relevant facts and circumstances it is necessarily adverse to the interests of the District. However, any of the interests described above shall be disclosed before any transaction is consummated. It shall be the continuing responsibility of the board, officers, and management employees to scrutinize their transactions and outside business interests and relationships for potential conflicts and to immediately make such disclosures.

Transactions with parties with whom a conflicting interest exists may be undertaken only if all of the following are observed:

1. The conflicting interest is fully disclosed;
2. The person with the conflict of interest is excluded from the discussion and approval of such transaction;
3. A competitive bid or comparable valuation exists; and
4. The District has determined that the transaction is in the best interest of the organization. Disclosure in the organization should be made to the Superintendent or Federal Programs Director.

The Superintendent and/or School Board shall determine whether a conflict exists and in the case of an existing conflict, whether the contemplated transaction may be authorized as just, fair, and reasonable to the District. The decision of the Superintendent and/or School Board on these matters will rest in their sole discretion, and their concern must be the welfare of the District and the advancement of its purpose.

### **Supplement Not Supplant**

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

All principals are made aware of the supplement not supplant issue during the schoolwide planning meetings that take place in the spring prior to the school year and during principal meetings throughout the school year. The various Federal Programs Directors and the Comptroller review QBE funding sheets for each school to ensure that any federal funds allocated to each school are supplemental. Principals approve all of the budget requests for their school. The Directors of the appropriate Federal Program and the Comptroller review all requests to ensure that supplanting is not taking place for any federal funds. The signature of the appropriate Federal Program Director ensures that the supplement not supplant question has been asked and determined that the purchase does not supplant.

The following questions are used to ensure that federal programs are supplementing, not supplanting:

If you answer "YES" to the following questions, you may have supplanted:

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.

The supplement not supplant provision must be followed for all federal grants with the exception of ESSER/CARES/ARP funds.

### **Methodology for Equitable Distribution of State and Local Funds**

The Jefferson County School District strives to treat all 5 schools equitably in regards to resource allocation.

One of the first steps when making staffing decisions for an upcoming school term is to take FTE/enrollment data for each school and determine how many teachers would be needed to staff each school at the maximum class size. This data defines the starting position as far as general fund staffing goes. From this point, the Superintendent, Comptroller and Federal Directors work together to decide if additional staff will be assigned and how the additional staff will be funded. In the event that Federal funds pay for additional staff, the Federal Directors make sure that the scenario being funded is allowed in their respective program and that all Federal regulations are being met. If necessary, Federal Program Directors will consult with their Area Program Specialist to make this determination.

A portion of QBE operating funds are given to the principals to spend at their discretion for school operation. To ensure that these funds are allocated in an equitable manner, FTE/enrollment data is used to determine the amount each school receives.

### **Capital Expenditures with Federal Funds**

As a general rule, the Jefferson County School System does not use Federal funds for items under object code 7XXXX (capital expenditures). When the need for a capital expenditure within a federal fund becomes apparent to a Federal Program Director, the director coordinates with the CFO and reaches out to the District's State Consultant for guidance through the additional steps needed to secure approval of said capital expenditure.

Grants responding to the 2020 COVID-19 pandemic (Elementary and Secondary School Emergency Relief Funds (ESSER) from the Coronavirus Aid, Relief, and Economic Security (CARES) Act, Coronavirus Response and Relief Supplemental Appropriation Act (CRRSA), American Rescue Plan Act (ARPA) are unique and unprecedented in volume of funds made available to the District and will in all likelihood have capital expenditures. The District will be relying heavily on guidance and direct input from the Ombudsman and Team assigned to these funds at the State level, as well as Financial Review and State Capital Outlay staff when using these funds for Capital Projects. Prior approval will be obtained before encumbering these funds for Capital Equipment and Capital Projects. Section 23 of this manual discusses these UNIQUE funds.

Projects and purchases falling into this category are not the norm for the District and will return to practical non-existence once these unprecedented Grants are fully expended.

### **PURCHASING (PROCUREMENT) PROCEDURES**

(A table of required approvals by fund is included at the beginning of this manual)

## Goods

Requisitions are submitted to the Program Director and/or Principal for approval.

The Program Director reviews the request to determine the following:

- Is the purchase an allowable cost of the federal program?
- Is the purchase within the approved budget at the function level?
- **Informal Procurement Method:** Does the purchase exceed the \$10,000 micro-purchase threshold? If yes, has documentation of pricing information from at least two sources been provided? Handwritten notes on the back of the requisition regarding pricing information obtained are acceptable documentation. Some goods and services are unique in nature and are only available from one specific vendor. If this is the case, documentation that the vendor is the **sole source** provider available is required on the back of the requisition in lieu of competitive pricing information. On occasion the services of artisans may be needed. The subjective nature of these services will likely place them into the **sole source** category.
- **Formal Procurement Method:** Does the purchase exceed the \$250,000 small purchase threshold? If yes, the Program Director will begin the process to obtain formal sealed bids or competitive proposals as required by federal regulation before purchase is approved. Some goods and services are unique in nature and are only available from one specific vendor. If this is the case, a letter documenting that the vendor is the **sole source** provider available is required in lieu of competitive pricing information.
- **Noncompetitive Proposals:** Some goods and services are unique in nature and are only available from one specific vendor. If this is the case, documentation that the vendor is the **sole source** provider available is required in lieu of competitive pricing information.
- Does the purchase exceed the \$25,000 suspension and debarment threshold? If yes, has documentation from the SAM.gov website been provided?

Once the Program Director determines all federal requirements have been met, the requisition is signed by the Program Director and forwarded on to the Superintendent for approval.

Once the Program Director and Superintendent have approved the requisition with their signatures, Purchasing Secretary enters the requisition in PCGenesis (PCG) and generates a Purchase Order (PO) number.

Purchasing Secretary orders goods or returns approved PO to requisitioner to order if requested.

Receiving documentation and/or a signed statement that goods were received are matched to PO and invoice. Email correspondence is an acceptable means of documentation.

Once the voucher package (PO, proof of receipt, invoice) is complete, Purchasing Secretary enters the invoice in PCG as a claim and cancels the PO if order is complete.

At least twice a month, Purchasing Secretary submits completed voucher packages to Comptroller. Secretary reviews documentation for completeness – valid PO, invoice, proof of receipt – and readies the claims inside PCG for processing. Comptroller reviews claims and PCG reports for coding errors. Once any necessary corrections are made, Secretary prints checks and check registers.

Checks and check registers are reviewed by Purchasing Secretary who makes copies of checks and distributes among secretaries for filing and mailing.

#### Routine Bills

Routine bills do not require requisitions or POs. Examples include but are not limited to utility bills, subscription renewals, annual bond payments, Board attorney fees, etc.

Bills/invoices are approved by the Program Director/Principal (when appropriate).

Secretary enters bill/invoice in PCG.

Superintendent approves for payment before claim is submitted to Comptroller for payment.

#### **Contracted Service**

When the need for contracted services has been identified in any planning forum, the Program Director and/or Principal will select the provider best qualified and suited for the service needed.

Recommendation is made to the Superintendent who either gives approval or presents for Board approval if necessary. Once approval is obtained and if appropriate, a contract is executed between the provider and the BOE. The contract will specifically identify duties of the contractor, include the number of hours of service to be provided, state the rate of pay for the services, and not extend beyond the current grant period if funded with Federal dollars. Quotes and estimates for goods may contain line items for related professional services.

Purchasing Secretary keeps copy of contract for reference as needed.

When appropriate, Purchasing Secretary will enter claims according to the terms of the contract until contract is depleted .

Claim is submitted to Comptroller for payment per the terms of the contract.

The nature of services may make POs more appropriate. In these cases, procedures for POs will be followed.

#### **Technical Evaluation of Procurement of Goods and Services**

The following process should be applied for goods and services that exceed the small purchase threshold of \$250,000:

The Jefferson County School System shall ensure that the process of procuring goods and services is fair and equitable by taking the following measures: Incorporating a clear and accurate description of the technical requirements for the material, product, or service to be procured. The description must not, in competitive procurements, contain features which unduly restrict competition. The description may include a statement of the qualitative nature of the material, product or service to be procured and, when necessary, must set forth those minimum essential characteristics and standards to which it must conform if it is to satisfy its intended use. Avoid providing detailed product specifications. When it is impractical or uneconomical to make a clear and accurate description of the technical requirements, a “brand name or equivalent” description will be used as a



means to define the performance or other salient requirements of procurement. The specific features of the named brand which must be met by offers will be clearly stated. Identify all requirements which the offers must fulfill and all other factors to be used in evaluating bids or proposals. Ensure that all prequalified lists of persons, firms, or products which are used in acquiring goods and services are current and include enough qualified sources to ensure maximum open and free competition. Also, the school system will not preclude potential bidders from qualifying during the solicitation period.

### **Suspension and Debarment Process**

Grant requirements state non-Federal entities are prohibited from contracting with or making sub-awards under covered transactions to parties that are suspended or debarred or whose principals are suspended or debarred. Covered transactions include those procurement contracts for goods and services awarded under a nonprocurement transaction that are expected to equal or exceed \$25,000. Jefferson County School System will utilize the SAM.gov website to search vendors to check for suspended or debarred parties. JCSS will also maintain documentation of the search in the Federal Programs and finance offices. The Federal Programs office staff will look at total cost for vendors on an as-needed basis. If the totals over the course of the year exceed \$25,000, the SAM.gov website will be utilized to search all vendors and documentation will be maintained. Contracts with consultants/vendors will be required to contain specific language on suspension and disbarment.

### **Domestic Preference for Procurements 200.322**

To the greatest extent practicable, the Jefferson County School System will provide a preference for the purchase of goods and materials produced in the U.S. As the school system moves forward, there is a plan to include this section on all subawards, contracts, and purchase orders as soon as practicable.

## **TIME AND EFFORT**

### **Periodic Certifications**

A periodic certification is required when LEAs use federal funds to pay employees' compensation. When LEAs pay employees' compensation using one federal grant, (for example, Title I Part A), a form called a "periodic certification" is prepared at the completion of the activity. A listing of these employees is signed by direct supervisor (usually principal) with direct knowledge of the activity and program director. If the LEA pays employees from more than one funding source (for example, State QBE and Title I Part A), the employees must complete a form with more detailed information, commonly referred to as a time log (see below). It is important to note that the periodic certification is applicable for schoolwide programs if the employee's activity (cost objective) is paid completely out of federal funds. Periodic Certifications will specifically show all funding sources and the percentage from each funding source.

A periodic certification must be completed at least semiannually.

Periodic certifications for staff development or other activities not lasting the duration of the school year may be completed at the close of the stated activity.

Generally speaking, periodic certifications may be completed in the Jefferson County School System in any given month depending on the activity being certified (regular salary, work done outside of contract, stipends

for staff development, mentor pay, etc)

The appropriate Federal Programs Director will create periodic certification forms on all eligible employees. The appropriate Director of Federal Programs will review all forms for accuracy. The forms will be disseminated to appropriate building principals. The building principals will be responsible for obtaining appropriate signatures and dates. All forms will be returned to the appropriate Director of Federal Programs.

The appropriate Federal Programs Director is responsible for implementing all components of the procedures for periodic certification.

**Time logs (PARS)** for employees paid from more than one cost objective must be completed at least once per month.

### **Stipends, Incentives and Supplemental Pay**

Stipend pay is for staff members receiving professional learning outside of his or her regular scheduled work hours or contracted days. As with state and local funds, federal stipends are paid in accordance with regard to the number of Professional Learning Units earned (up to \$250/PLU) or one 7- hour work day (with one additional hour allocated for lunch) worked beyond the contract day. Stipend-based professional learning is aligned to a district or school initiative or to the individual's professional development plan. All participants are expected to demonstrate skills, knowledge or practices gained from the professional learning in the job setting. Stipends must be reasonable and necessary to the federal program and for performance in allowable activities. State and federal funds designated for professional learning may not be used to pay stipends for school board members or to school council members who are not employees of the district.

Employees may receive hazard pay (or a pay differential) for a national or local emergency to perform critical services. Instances when this might happen may include a pandemic or a natural disaster. Employees will be compensated for fully completing an objective from a supervisor related to the aforementioned conditions. Additionally, employees may receive incentive stipends for following vaccination or other recommendations of the CDC and other public health agencies.

Employees may receive retention stipends to support stronger recruitment and retention of staff. The Superintendent and leadership team will determine the amount and frequency of retention stipends. 49% employees will receive 49% of the established amount. Substitute teachers working at least ten days, may receive a similar stipend. When awarded, this stipend will be set as a daily amount and substitutes will be paid at the end of the year for the number of days they worked over the course of a school year.

Mentor stipends are in accordance with the agreed-upon annual rate of \$1000 (after 50 hours of documented evidence).

In keeping with the GaDOE Title II-A Handbook, incentives do not require time and effort documentation. The district may elect to use federal funds for allowable recruitment and retention activities. Recipients of recruitment and retention incentives are not required to complete any work related to the grant in order to receive these incentives, thus this expenditure is not subject to federal time and effort documentation requirements but must be documented in compliance with federal grant and local and state guidance. Required

documentation for monitoring purposes must include a (1) rationale, (2) budget line item with descriptions and (3) financial incentive recipients.

## **Travel**

- Travel costs must be reasonable and consistent with the written travel policy/or follow GSA 48 CFR 31.205-46a.
- Request To Travel (RTT) forms are presented to Principal prior to an employee's trip. The form provides the purpose of the trip, the date of the trip, the need of a substitute teacher to cover during the activity, and an estimate of mileage and other reimbursable travel expenses that will likely be incurred. If the Principal approves of the request being made, he signs the RTT and forwards the form to the County Office.
- Program Directors review RTTs to determine if activities are allowable within their Federal Program. If allowable and within the approved budget, PD signs the RTT and forwards on to Superintendent for approval. Once the Superintendent signs, a copy of the form is given to payroll to use in processing substitute pay (if needed). These forms are recommended for administrative/support personnel, but not required.
- Once approved by Superintendent, POs are entered into PCG by Purchasing Secretary.
- Requests for travel reimbursements are submitted to principal and/or Program Director for approval. Travel reimbursements are made according to state travel regulations.
- Once approved, secretary matches form to RTT (when appropriate), determines that all required receipts and agendas, supporting the need for participation in the conference, have been included. The secretary then checks for accuracy and enters claim in PCG.
- Superintendent approves for payment before claim is submitted to Comptroller for payment. The Superintendent may also approve travel reimbursement requests that do not have RTT forms.
- Travel reimbursement requests made for travel occurring more than 60 days earlier are paid only at the discretion of the Superintendent and if made are paid through payroll per state regulations.
- Periodically, Comptroller scans object 580 to make sure charges were not posted there by mistake

The appropriate Federal Programs Director must ensure all travel requests are financially reasonable, necessary to operate the Federal Grant Program effectively, located in the DIP/SWP/SIP. The appropriate Federal Program Director and school must be able to answer the following questions:

- How is this workshop addressed in your Federal Grant Schoolwide Plan and your School Improvement Plan?
- How will this workshop affect student achievement?
- How will the information received at the workshop be redelivered to other faculty? When will it be redelivered?
- How will you use the information received during this calendar school year?
- Is this workshop necessary?

- Is the cost reasonable?
- Is this workshop offered in Georgia?

### **Grant Draws**

- Purchasing Secretary generates summary and/or detail expenditure reports for grants in PCG (usually between the 1<sup>st</sup> and 10<sup>th</sup> of the month).
- Purchasing Secretary compares expenditures to date with monies received to date. The difference in the two amounts represents the amount of money that should be requisitioned. Rounding to the nearest dollar is acceptable.
- Purchasing Secretary prepares a request in the DOE's GAORS system.
- A screenshot of the request is presented to the Comptroller along with the expenditure reports used to create the claim.
- Comptroller and the appropriate Federal Program Director review and approve or modify the request (at the function level).
- Payroll Manager then submits the claim in GAORS to finalize the process.
- Secretary uses grant payment advice to prepare a journal entry to record revenue when received.
- Journal entry is reviewed by Comptroller who verifies that money has been deposited into the district's bank account.
- Comptroller imports and posts journal entry into PCG.
- At year end Purchasing Secretary, Comptroller, and the Federal Program Directors work together to establish appropriate receivable amounts for each program.

### **Completion Reports**

- Purchasing Secretary prepares completion report based on budget summary reports at year end.
- Comptroller and Federal Program Director(s) review completion report to assure that all cost objectives are in the approved budget.
- Comptroller reviews and the Federal Program approve completion reports.
- Payroll Manager submits completion reports.

### **Internal Controls for Computerized Accounting System**

- The PCGenesis accounting system is structured so that user-defined roles determine the need for access to certain portions of the system. Access is limited to those only with a direct need for such

information. These user defined access rights allow the Comptroller to assign or prohibit access to various parts of the accounting system (i.e., only payroll personnel has access to payroll, etc.)

- Password controls are in place but will not be spelled out for security reasons. Users are forced to reset their passwords at given intervals throughout the year. Computers are set to timeout and lock after a specified amount of idle time.
- After a number of unsuccessful login attempts, the PCG locks the user from further activity, and they must then contact the System Administrator to regain access. They are required to reset their password through the System Administrator.

### **Bank Reconciliation**

Bank statements may be exported and/or printed from bank websites by Comptroller or received in the mail.

Secretary uses bank statement to mark checks as cleared within PCG. Outstanding check list is produced.

Comptroller uses outstanding check list, bank statement, and PCG bank reports to complete bank reconciliation process.

Completed reconciliations are approved by Superintendent.

### **EQUIPMENT MANAGEMENT – INVENTORY**

Equipment and instructional materials are inventoried by the media specialist at each school in the Media Center's software "Destiny." Each record contains:

- Description of the equipment
- Vendor
- Serial number or other identification number
- Source of funding for the equipment
- Federal Award Identification Number (FAIN) (FY16 and after)
- Who holds title, if applicable
- Acquisition date
- Cost of the equipment
- Percentage of Federal participation in the cost of the equipment
- Location of the equipment
- Use and condition of the equipment

- Ultimate disposition data including the date of disposal and sale price of the equipment
- Inventory records are kept for three years after equipment is disposed

In addition to being noted in the item's Destiny record, the equipment is tagged to identify the purchasing Federal Fund. Equipment valued at \$5000 or more is also tagged with capital asset number and added to the system's fixed asset inventory to be included in year-end depreciation calculations (comptroller). This database includes the basic record contents listed above as well as additional information needed to calculate depreciation expense.

Media Specialists generate lists of equipment/instructional material assigned to teachers at least once per year. Lists are distributed to teachers who compare the list to actual contents of their rooms. Discrepancies are noted with explanation and Media Specialist resolves as needed.

Capital asset inventory is physically checked by system employees at least once every two years.

In addition to the school's bi-annual inventory described above, the system Technology Coordinator produces a listing of all equipment purchased with Federal Funds at least once every two years. Tech Paraprofessionals then complete a physical inventory of the list, noting discrepancies. The completed inventories are returned to the Technology Coordinator who works with Media Specialists to resolve issues as needed.

At least annually, principals work with Maintenance Director to identify equipment that needs to be surplus. Maintenance Director consolidates a list of items to be surplus. Media Specialists work with Technology Director throughout the year in a similar manner. Surplus equipment purchased with federal dollars are offered to other schools within the system to see if the equipment still has a use within the system. If no school within the system can use the surplus equipment, the appropriate Program Director will obtain guidance from Area Program Specialist to ensure that surplus equipment is disposed of in a manner compliant with Program regulations.

Surplus items with value >\$500 are presented to the Board for approval. Once the Board approves the surplus list, items are offered for sale to the public either through a locally advertised sale handled by the district or through Bidderone, an online auction company.

Items valued <\$500 can be surplus by the Superintendent and disposed of or sold depending on the condition of the item.

Media specialists, technology coordinator and comptroller remove surplus items from their inventories as necessary.

Per the direction of the Board, computers and other technology items are recycled when they become inoperable and/or obsolete. The technology department is not required to present a listing to the Board.

The following are the procedures to eliminate any equipment item from the inventory following Jefferson County Board of Education policy DO:

*The Superintendent is authorized to sell surplus school property that is valued at \$500.00 or less. The sale of school property of more than \$500.00 must have Board approval. Any sale to the public of property of more than \$500.00 must be advertised and sold to the highest bidder. If a bid is not received, property shall be disposed of in a manner which is most economically feasible.*

*Any school property, personal or real, may be declared surplus when it is not needed for school purposes, when it is obsolete, or when the cost of maintenance is excessive. Surplus property may be land, buildings, equipment, or materials.*

### **Land and Buildings**

*Board action is required to declare that the real property is no longer necessary or convenient for school purposes and to specify the terms and manner of the sale or disposal of the asset.*

### **Serviceable/Usable Surplus Property**

- 1. It shall be the responsibility of the principals to classify school property into two categories: usable and unusable. A list of these surplus items must be submitted to the Board before disposition. Materials and equipment that are unusable and not sold may be disposed of in a manner which is most economically feasible.*
- 2. The Superintendent or designee will have the authority to sell the surplus items either through sealed bid, public auction, public sale or private sale, whichever is in the best interest of the school system. The Superintendent or designee may recycle surplus items if it is in the best interest of the school system or transfer items to other non-profit organizations in response to written request at no charge.*

### **Instructional Materials**

- 1. Disposal of instructional materials should take place when they have outlived their usefulness. Materials should be discarded when:*
- 2. Mending or rebinding is impossible*
- 3. Content is obsolete*
- 4. Paper or film becomes discolored or brittle*
- 5. Disposition of instructional materials should follow the same guidelines as surplus property.*

### **Non-serviceable/Unusable Surplus Property**

*The Superintendent or designee may dispose of surplus items that have a value under \$500 that are too damaged for resale or pose a health or safety risk to the School System in the most efficient manner.*

### **Obsolete or Impaired Assets**

*In the event that a capital asset's utility becomes impaired or obsolete, the Board must decide if the asset will be disposed of or retained by the school system. Board action is required to specify the terms and manner of the sale or disposal of the asset. Should the Board decide to retain the asset, the asset's carrying value will be considered. If said value is over \$5000, the carrying value will be recalculated and recognized on the books in*

accordance with GASB 42. A copy of GASB 42 is maintained on file at the Board Office, 1001 Peachtree Street, Louisville, GA 30434.

### **Federal Funds and Equipment**

Equipment purchased federal funds shall be disposed of in accordance with state law and procedures and according to the current Guidelines for Using Title I Equipment from the Georgia Department of Education based on OMB Circular A-87, EDGAR 80.32, and this policy.

*From The Jefferson County Board of Education Policy Manual: Policy DO*

### **Off-site Use of Technology**

The Jefferson County Board of Education does not allow off-site use of technology except for educational purposes related to the mission and vision of the school system.

### **LEA dissemination of Inventory Procedures**

The Jefferson County disseminates inventory procedures through the Employee Handbook which is online at [www.jefferson.k12.ga.us](http://www.jefferson.k12.ga.us). All employees sign a statement acknowledging that they know how to access the policies of the school system and the employee handbook.

### **Loss, Damage, or Theft of Equipment**

The Jefferson County School System maintains an inventory on all instructional materials, equipment, and computers. At the beginning of the school year, each teacher must sign an inventory list verifying the items that are located in his/her classroom. At the end of the school year, each teacher will be responsible for the missing items. If a teacher leaves the school system, he must be cleared through the media center for the inventory of items in the classroom. A final accounting is made to the principal who in turn makes the report to the central office. A report of lost, damaged, destroyed or stolen property form (employee tab on website) must be completed. A police report must be attached if the item is worth \$200 or more.

## **SECTION 6: TITLE I, PART A - WITHIN DISTRICT ALLOCATION PROCEDURES**

### **SECTION 6.1: GENERAL SELECTION REQUIREMENTS**

The purpose of Title I, Part A is to provide all children significant opportunity to receive a fair, equitable, and high-quality education, and to close educational achievement gaps (Sec. 1001)

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

An LEA must use the same measure of poverty for:

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



- Determining the allocation for each area.

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

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

Identified students under Community Eligibility Provision (CEP) are eligible under the Richard B. Russell National School Lunch Program (NSLP). If the LEA selects NSLP data as its poverty measure (or uses the data in a composite) and has a CEP school, the CEP data will be part of the NSLP data that the LEA uses

An LEA must rank school attendance areas based on the percentage (not the number) of low-income children counted and without regard to grade spans.

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

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

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

An LEA's organization of its schools defines its grade-span groupings. For example, if an LEA has elementary schools serving all elementary grades, middle schools, and high schools, the grade-span groupings would be grades K to 5, 6 to 8, 9 to 12. To the extent that an LEA has schools that overlap grade spans (e.g., K to 5, K to 8, 6 to 12), the LEA should include a school in the grade span in which there are the greatest number of grades represented. For example, a K-8 school would be included with other elementary schools because this K-8 school has more elementary grades (5) than middle school grades (3).

#### LEA Discretion in Selecting Participating Areas and Schools

An LEA may:

Designate as eligible any school attendance area or school in which at least 35- percent of the children are from low-income families, i.e., the 35-percent rule. Keep in mind that to be a Schoolwide School, the poverty level must be 40% or above or the school must have an approved Title I Schoolwide waiver (See Section: "Using Title I Schoolwide Programs to Support School Reform" for more information on the Title I Schoolwide waiver).

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

For one additional year only, designate and serve a school attendance area or school that is no longer eligible but was eligible and served in the preceding year. When using this option, an LEA must meet the requirement to serve schools in rank order. This is commonly known as the Grandfather Clause.

Elect not to serve an eligible school attendance area or eligible school that has a higher percentage of children from low-income families if—

I. the school meets the comparability requirements of section 1118(c);

II. the school is receiving supplemental funds from other State or local sources that are spent according to the requirements of section 1114 or 1115; and the funds expended from such other sources equal or exceed the amount that would be provided under this part.

**All schools in the Jefferson County School System participate in the Community Eligibility Provision. Breakfast and lunch are provided to all students at no charge under CEP. Poverty percentages are determined for CEP schools based on data for students certified through direct certification data rather than through free and reduced meal applications. All students in CEP schools are considered Economically Disadvantaged. To determine Title I funding to schools, the LEA will use students identified by the direct certified data and divide it by the enrollment of the school to determine the rank order of the schools.**

**This CEP information is entered into the Eligible Attendance Area worksheet on the Consolidated Application. A poverty percentage for each school is then generated. This poverty percentage determines the rank order in which schools are to be served. A per pupil amount is established for each Title I school. The per pupil amount is multiplied by the number of poverty children at that school. That determines the school's allocation. The Public School Allocation page in the Consolidated Application contains the per school allocations. There are no residential treatment facilities within Jefferson County.**

## **6.2 CALCULATION OF FUNDS FOR REQUIRED SET-ASIDES**

The Jefferson County School System (JCSS) must reserve funds to provide comparable services to those services provided to children in funded schools including:

- **Homeless children**
- **Children in local institutions for neglected children (if applicable)**
- **Children in local institutions for delinquent children (if applicable)**
- **Parent and Family Engagement, including carryover**
- **Private School Proportionate Share, including carryover (if applicable)**

To ensure that the set-asides are calculated correctly, the JCSS follows the procedures below for calculating the required district set-asides.

**The district must reserve funds necessary to provide comparable services to homeless children. The JCSS must use one of the following four methods to calculate the homeless set-aside:**

- 1) Identify homeless student needs and fund accordingly

- 2) Obtain a count of homeless students and multiply by the district's Title I, Part A per-pupil allocation
- 3) Reserve an amount greater than or equal to the district's McKinney-Vento sub grant request; or,
- 4) Reserve a specific percentage of the district's poverty level or its Title I, Part A allocation.

Set-aside funds may be used to assist homeless students in all JCSS schools. A homeless set-aside is required even if all schools in the district are Title I, Part A schools.

JCSS uses method number 1: Identify homeless students' needs and fund accordingly. Prior to determining the set-aside amount there is an annual meeting with the Title I Director and the Homeless Liaison (System Social Worker). They recognize all needs cannot be met; therefore, a reasonable amount is negotiated to support the needs of the homeless students. In determining appropriate expenditures for the set-aside for homeless students, it is important to note that comparable services may not necessarily mean services that are identical to the services provided to non-homeless students. The district has the discretion to use set-aside funds to provide homeless students with services that are not ordinarily provided to other Title I students and that are not available from other sources (i.e., uniforms, expedited evaluations, eyeglasses, transportation).

#### **Calculation of the Neglected and Delinquent Set Aside: N/A**

#### **Calculation of the Parent and Family Engagement Set-Aside**

For systems like JCSS, with a Title I, Part A allocation greater than \$500,000, at least one percent of the allocation must be set-aside for parent engagement. The parent and family engagement set-aside is calculated by multiplying the total Title I, Part A allocation by one percent. Based on stakeholder survey input, the system has principals sign the Districtwide Parent and Family Engagement Activity-Project Assurance Form. The Title I 1% parent involvement funds are used for parent contacts at the three elementary schools to notify parents and help increase parental involvement beginning at the lowest level.

In order to ensure that the correct amount of funds for parental involvement are calculated correctly, the LEA sets aside a minimum of 1% of the regular Title I funds for parental involvement. The LEA also develops a worksheet that takes the allocation from the previous fiscal year and subtracts the amount spent from the previous fiscal year to determine if any parental involvement funds should be carried over into the present fiscal year.

#### **Calculation of Parent Engagement Carryover Funds**

The Jefferson County School System will annually determine the amount of parent engagement carryover.

Calculation of Parent and Family Engagement Carryover:

A journal summary operations report is run for the previous school year based on the following criteria:

- Fund code: 402
- Function code: 2100

Additionally, an expenditure detail report (journal summary operations report) is run for the interim period of July through September if funds for parent engagement were expended during that time. This amount may be pending depending on when the initial Title I, Part A budget is submitted.

In a district-created worksheet, the Director of Federal Programs enters the following information:

- Previous year's Title I, Part A initial allocation
- Previous year's parent engagement 1% set-aside
- Previous year's parent engagement expenditures during the year (July through June)
- Previous year's parent engagement expenditures for the interim period (July through September) if applicable

If the parent engagement expenditures plus the parent engagement interim expenditures are greater than the one percent required set-aside, parent engagement carryover will be zero dollars for the current school year. If the expenditures are less than the one percent required set-aside, then the difference of the set-aside minus the expenditures will be listed as carryover for the current school year.

The expenditure detail report and parent and family engagement carryover worksheet will be maintained for documentation purposes.

**Calculation of the Private School Proportionate Share: (N/A)**

**SECTION 7: PROFESSIONAL QUALIFICATIONS**

Every Student Succeeds Act (ESSA) requires SEAs and LEAs to ensure that teachers meet state certification requirements. Georgia law allows charter and strategic waiver systems to waive some provisions of Title 20, including certification; however, LEAs may not waive service certification for Special Education teachers in alignment with the student's IEP. Jefferson County School requires that ALL teachers have a bachelor's degree with the only exception being CTAE and ROTC teachers who will be allowed to use two plus years of industry/military experience and/or education. ALL teachers MUST have a clearance certificate as well. Paraprofessionals must hold state certification and a clearance certificate.

In Georgia, all LEA schools are required to provide timely notice to parents when students have been assigned or taught for four or more consecutive weeks by a teacher who does not meet applicable state or licensure requirements (including professional qualifications developed by the LEA in alignment with an approved charter or strategic waiver application) at the grade level and subject area in which the teacher has been assigned. Jefferson County ensures this requirement is followed by requesting a copy of all 20 day letters from the principals.

Jefferson County uses a variety of resources to ensure that teachers are professionally qualified including a recommendation to hire form that principals submit when recommending a potential teacher. The Human Resources department verifies that the candidate holds a bachelor's degree and professional qualifications. The HR Director and Assistant Superintendent of Teaching and Learning verify PQ and In- field using CPI and the In-field portal data in the fall and spring. The LEA uses Title IIA funds for GACE assessments and TAPP tuition to provide avenues for teachers to become professionally qualified and fully certified.

**SECTION 8: TITLE I -PART A - NOTICE TO PARENTS**

**The Jefferson County School System does not fund a Title I language program nor does it receive Title III funds at this time.**

When and if it is applicable, notice to parents of English Learners (ELs) identified for participating or participating in a Title I or Title III language instruction educational program, will be sent out later than 30 days after the beginning of the school year with the required content outlined in the ESSA.

Below are two formed letters:

1. The first is a letter sent to parents of those who may be identified (or need to be screened) at the beginning of the school or for those students who may be identified after the school year has started.
2. The second letter is to the parents of those students who have already been identified in the previous year(s) and are currently in the program of the annual meeting at the beginning of the school year to discuss the previous year's scores and set goals for the coming year.

## **SECTION 9: PARENT AND FAMILY ENGAGEMENT**

### **LEA Parent and Family Engagement Plan**

The LEA Parent and Family Engagement Plan is revised annually. The Jefferson County School System takes the following actions to involve parents in the joint development and revision of its system-wide Parent and Family Engagement Plan under section 1116 of the ESEA:

- Reviews the results of annual system and school level parent surveys and school plans for feedback to be incorporated into the development and revision of the LEA plan.
- Requires each school to provide documentation that parents have been involved in the development of the school-level Parent and Family Engagement Plan. Feedback in the form of surveys, discussion outlined in the school council minutes, minutes from parent meetings, focus groups, etc. are some of the strategies schools may employ for ensuring parental involvement in the planning process. The summaries of findings from each school and from the school system surveys are reviewed and included in the revised LEA plan.
- Once the policy is revised and dated (month, date, year), copies are sent home by students to every parent. Copies are posted on the system website and displayed on the central office bulletin board, and in prominent places at the schools.

### **LEA Parent and Family Engagement Plan Revision Process:**

A Comprehensive Needs Assessment (CNA) is conducted in the spring as part of the updates for the District strategic plan, the school improvement plans, schoolwide plans, and the CLIP. All stakeholder groups are surveyed with the Federal Programs Survey in the spring for input. Stakeholders including parents, students, teachers, paraprofessionals, business leaders, higher education representatives, and administrators are invited to be a part of the meetings. Principals and central office staff call, e-mail, and send flyers by the students to ensure that all stakeholder groups are represented. Principals and central office staff submit data to the appropriate Federal Programs Director to develop the CNA. Data includes survey and perceptual data, test data, class size data, discipline data, equity data, and HiQ teacher and paraprofessional data. All federal programs are included in the CNA process.

The Federal Programs Annual Survey as well as focus group surveys, and meetings are developed so stakeholder input can be documented in written form. The CNA allows stakeholders to have an opportunity to provide feedback on the Consolidated Application (CLIP), System Strategic Plan, Schoolwide Plans/School Improvement Plans, System and School Parent Engagement Plans, Compacts, parental activities to increase student achievement, how to spend the 1% of parent engagement funds, how to build the capacity of staff with the assistance of parents, and additional resources requested for the Parent Resource Center and building staff capacity with assistance of parents. One outcome of the CNA is to determine professional learning needs including the integration of technology to improve and support teaching, learning, and technology literacy.

The academic needs for each school are utilized to develop the LEA and school level Parent and Family Engagement Plans and the School-Parent Compacts. Professional learning is driven by the needs identified

through these processes. Budgets are developed and resources are effectively allocated based on the academic needs of students to include the professional learning needs of staff.

### **School Parent and Family Engagement Plan Revision Process**

Principals are responsible for the implementation of this process. They will coordinate the review of the school-level Parent and Family Engagement Plan, School-Parent Compact and Schoolwide Improvement Plan. The principals invite all parents to have multiple opportunities to participate and provide input on the documents. Input will include, but will not be limited to, School Parent and Family Engagement Plan, School-Parent Compact, Building School Staff Capacity with parental assistance, and 1% set-aside for parent and family engagement activities at each school. Through the use of the Parent and Family Engagement checklist, the LEA will monitor this process. This checklist contains each of the four components required of stakeholder input. Technical Assistance will be provided for schools based on the checklist. Principals will be required to provide documentation of supporting evidence required of the input meeting, examples, agenda, sign in sheets, presentations.

The LEA will ensure all required components are included in the School Parent and Family Engagement Plan through the use of the Parent and Family Engagement Checklist. The Title I Director will be responsible for reviewing the Parent and Family Engagement Plans for compliance through the use of the checklist. Throughout the revision process technical assistance, to ensure that all required components are included, will be provided to the schools on an as needed basis reflected in the checklist. A sample template will be provided to the schools as a guide for their 2022-2023 School Parent and Family Engagement Plan. Use of this resource will provide assistance during the process.

These opportunities for input will be provided through the following:

- **Title I Open House for the school year:** School administration invites all parents in to review the documents for the school year (Parent and Family Engagement Plan, School-Parent Compact & School Improvement/Schoolwide Plan). The annual review, needs assessment and other school data are used to ensure the effectiveness of parent programs. Participants are asked to turn in written surveys and recommendations for the revision of these documents on a feedback form. Open House meetings are held separately from the Annual Title I meetings at each school.
- **Parent meetings:** Parent meetings are held throughout the school year. Principals have been instructed to remind parents what they have pledged to do in the school-parent compacts to support the school and the students as part of their agendas. Opportunities are given to collect more input in the form of surveys, focus groups, and documented responses during the meetings.
- **Surveys:** Parents are provided surveys throughout the year both online and in person as opportunities to provide input on the School Parent and Family Engagement Plan.
- **Ongoing Communication:** Parents that are new to the school throughout the school year receive documents during orientation.
- The revised school level Parent and Family Engagement Plans are sent home before November 1 of each school year.

### **School-Parent Compact Revision Process**

Each school in the Jefferson County School System (JCSS) updates the School-Parent Compact annually. The following process is followed:

- **Creating the Compact:**  
The Title I Director will send the updated suggested Georgia Department of Education Compact template to all school administrators. Administrators are given technical assistance on creating their School-Parent Compact.
- **Revising the Compact:**  
The school will offer multiple opportunities for the revision of the School-Parent compact where all parents are invited to give feedback. After multiple opportunities for input are given for the Compact, schools then are expected to revise the Compact using the input from the stakeholders.
- **Signing the Compact:**  
The schools will distribute the School-Parent Compact by November 1 of each school year. Each compact should be dated and signed by a school representative, parent and student, which signifies agreement of the compact.

### **Plan to Carry Out Effective Parental Engagement Practices:**

The school system will work with all of our schools, which are all Title I schoolwide, to provide assistance to parents of children served by the school system or school, as appropriate, in understanding the following: the State's academic content standards; student academic achievement standards; State and local assessments including alternative assessments; the requirements of Title I; how to monitor their child's progress; and how to work with educators through activities. Many opportunities are provided for building strong parent capacity. The purpose is to ensure effective engagement of parents and to support a partnership among the schools, parents, and the community to improve student academic achievement, though, at minimum, the following activities. Including, but not limited to, those listed below:

- Annual Title I meeting and separate Annual Open Houses
- A minimum of three parent teacher conferences per year at the elementary level
- Parent advisory meetings
- Parent Engagement meetings
- Board of Education meetings
- School and classroom newsletters
- Annual notification of CCRPI status
- Newsletters/flyers/brochures
- Website information
- Family curriculum and fine arts nights
- Volunteering
- Phone calls and texts (*Power School*– system- and school-level calling alert)
- Parent workshops and activities
- Student Handbooks
- School communications distributed in home languages
- Articles published in local newspaper
- Social media: Face Book and Instagram

The school system, with the assistance of Title I, will provide materials and training to help parents work with their children to improve their academic achievement, such as literacy training and using technology, as appropriate, to foster engagement through activities such as, but not limited to, those listed below:

- School and classroom newsletters

- Computer classes
- School based workshops and parent meetings
- Ensure school communications are distributed in home languages

## **SECTION 10: SCHOOL IMPROVEMENT 1003 (a)**

### **1. Technical Assistance to Schools**

All five of the schools in Jefferson County are Title I Schoolwide schools. The school system participates in the annual review/revision of the School Improvement/Schoolwide Plans (SIPs).

The schools are given a timeline for the review/revision of SIPs along with information regarding the process and reference to the system's Comprehensive Needs Assessment (CNA) and the Consolidated LEA Improvement Plan (CLIP). Clarifications, corrections, or additional information are obtained via email, in principals' meetings (in-person and virtual), or by phone with the various federal programs directors.

The SIPs for each school are housed on the SLDS platform. The schools are given access to these templates and work on SLDS to write and revise the school improvement plans. Technical assistance sessions are offered by the central office and provided upon request.

Schools hold stakeholder meetings for input on their Comprehensive Needs Assessment (CNA) and School Improvement/Schoolwide Plan (SIP).

Schools enter their CNA and SIP into the SLDS application. Principals use their data sources to update the plan in the SLDS. The school governance team reviews and approves the SIP prior to submission to the central office for the various federal program directors to review.

The plans are reviewed by the various federal program directors to determine if the plans are complete. Data is reviewed to ensure that it supports identified initiatives. Additionally, budget requests are cross-referenced to identified needs and action steps in the plan and to the system CLIP. Principals use their data sources to update the plan in the SLDS. If the SIP is not complete and needs revision, the appropriate federal program director meets with the principal to ensure that all revisions are made.

### **2. CSI TSI Support**

A. The Jefferson County School System currently has three schools designated as 1003(a) schools: Jefferson County Middle School (TSI), Jefferson County High School (Promise), and Louisville Academy (Promise). The system has developed a district plan of support for each of the schools under the direction of the Georgia Department of Education with Dr. Michelle Hamilton as the GaDOE contact. The district ensures that all the identified schools have conducted a comprehensive needs assessment as the basis for their school improvement/schoolwide plans (SIPs).

The district constantly monitors these three schools which received funds under ESEA 1003. The district recruits, screens, and evaluates external partners using a rigorous review process. During FY22, these partners include GaDOE, CSRA RESA, Augusta University, and Molly Bestge with Cultivate21. Monitoring goes on throughout the year through observations, walk throughs, emails, principals' meetings (in-person and virtual), or phone calls by the various federal programs directors.

The ongoing intent from the district is to incorporate careful planning along the way to ensure that the programs and activities provided as a part of the improvement efforts will increase the academic achievement of individual students participating at the schools. The system works to modify practices and policies to provide



flexibility that will enable the 1003(a) schools to effectively implement their improvement plans as deemed appropriate.

Budget justifications are developed with the school and system leadership teams and submitted to approval by our Georgia Department of Education contact and his/her team for approval before submitting the School Improvement 1003(a) budget in the CONAPP. The system consistently examines and monitors the effects of interventions purchased with 1003 funds. Interventions supported with the 1000 funds must be based on strong, moderate, or promising evidence of a statistically significant effect on improving student outcomes or other relevant outcomes as defined in ESEA section 8101 (21)(A)(i).

All parents are given a genuine opportunity to provide input, comments, suggestions and ideas for the SIPs as it relates to improving the academic achievement of students. The district and schools consult extensively with parents and other stakeholders in developing the SIPs. Documentation (agendas, sign-in sheets, meeting minutes, etc.) is maintained to support the collaboration.

The school system aligns the school goals to the system goals to ensure that professional development is provided in areas of assessed need for the schools. Jefferson County supports the TSI and Promise Schools by providing assistance in the development of corrective action plans when needed. Professional development is offered system-wide for implementing clarity for learning, differentiation strategies and small group instruction in all schools, but particularly targeting the TSI and Promise Schools to improve student achievement for all students. Professional learning and assistance with data utilization are used to help inform instructional decisions.

## **SECTION 11: SCHOOL IMPROVEMENT 1003(g) (SIG)**

The Jefferson County School System does not receive School Improvement 1003(g) funds. Policies and procedures will be put in place if the district becomes a grantee.

## **SECTION 12: SERVICES FOR HOMELESS CHILDREN & YOUTH**

### **Purpose of McKinney-Vento**

The McKinney-Vento program is designed to address the problems that homeless children and youth have faced in enrolling, attending, and succeeding in school. Under this program, local and state education agencies must ensure that each homeless child and youth has equal access to the same free, appropriate public education as other children and youth. Homeless children and youth should have access to the educational and other services that they need to enable them to meet the same challenging state student academic achievement standards to which all students are held.

### **Homeless Children and Youth Defined**

“Homeless children and youth” are defined by the McKinney-Vento Act as those individuals who lack a fixed, regular, and adequate nighttime residence. The term includes children and youth who are:

- Sharing the housing of other persons due to loss of housing, economic hardship, or a similar reason (sometimes referred to as *doubled-up*)
- Living in motels, hotels, trailer parks, or camping grounds due to lack of alternative adequate accommodations
- Living in emergency or transitional shelters
- Abandoned in hospitals
- Awaiting foster care placement

- Children and youth who have a primary nighttime residence that is a public or private place not designed for, or ordinarily used as, a regular sleeping accommodation for human beings
- Children and youth who are living in cars, parks, public spaces, abandoned buildings, substandard housing, bus or train stations, or similar settings
- Migratory children who qualify as homeless because they are living in circumstances as described above.

### **Identification**

In collaboration with school personnel and community organizations, the liaison will identify children and youth in transition in the district, both in and out of school. The liaison will train school personnel on possible indicators of homelessness, sensitivity in identifying families and youth in transition, and procedures for forwarding information indicating homelessness to the liaison. The liaison will also instruct school registrars and secretaries to inquire about possible homelessness upon the enrollment and withdrawal of every student, and to forward information indicating homelessness to the liaison.

### **School Selection/School of Origin**

Homeless children and youth frequently move, and maintaining a stable school environment is critical to their success in school. To ensure this stability, LEAs must make school placement determinations based on the “best interest” of the child. The Jefferson County Board of Education will make every effort to maintain the child’s school of origin for the duration of homelessness when a family becomes homeless between academic years or during an academic year or for the remainder of the academic year. The school social worker will work with the family to complete related paperwork for the transportation department that will ensure a student’s ability to remain at the school of origin through the remainder of the grade span or until the end of the academic year in which permanent residency can be obtained.

### **Role of Personnel working with Homeless Children and Youth**

#### **Role of the Homeless Liaison/School Social Worker**

The local liaison serves as one of the primary contacts between homeless families and school staff, district personnel, and other service providers. The liaison coordinates services to ensure that homeless children and youth enroll in school and have the opportunity to succeed academically. The liaison helps to ensure that parents and guardians are informed of educational and related opportunities available to their children and that they are fully informed of all transportation services, including transportation to and from the school of origin, and of nutrition services, including eligibility for free lunch. In Jefferson County, the Homeless Liaison is Burine Hill.

The homeless liaison/social worker will follow-up with the family and will help with the enrollment process.

The homeless liaison/school social worker will assist families by:

- Working with school staff to make sure that homeless children and youth are immediately enrolled in school
- Work with families to complete transportation information to be submitted to the transportation department for students electing to remain at the school of origin
- Inform parents that all Jefferson County students are eligible for free breakfast and lunch
- Informing parents, school personnel, and others of the rights of homeless children and youth
- Help to coordinate and inform families of community and school agencies

### **Role of School Administration with Homeless**

Upon receiving notification of a student(s) that is potentially homeless, recognize that the student information should remain confidential, as defined by FERPA. Treat the family with respect, understanding the difficulty of the situation. The principal or his/her designee should:

- Greet the family and welcome them to Jefferson County and/or the school

- Contact the county homeless liaison/school social worker who will assist the families with the enrollment process

### **Role of the School Counselor with Homeless**

The school counselor plays a vital role in helping students and families cope with changes associated with homelessness. The school counselor should be available to greet families and help ease the transition to the new school setting, when applicable. The school counselor should work with the school social worker to aid students in getting required school supplies

### **Community Services and Agencies**

The school social worker maintains a list of community services and agencies that can help families in need in the area of food, clothing, shelter, and payment of basic utilities. Families in need should be referred to the school counselor. The school counselor will contact the school social worker for follow-up.

### **Enrollment Procedures**

The Jefferson County School System will immediately enroll any child or youth in transition. Enrollment will not be denied or delayed due to the lack of any document normally required for enrollment.

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

1. Enrolling families should be greeted cordially by the front office staff and school administrative staff
2. The homeless liaison/school social worker should be notified immediately by the office staff of an enrolling family that may qualify as homeless.
3. The homeless liaison/school social worker will contact the enrolling family and provide assistance with completing the necessary documentation for validation of homelessness and school enrollment.
4. The homeless liaison/school social worker will provide the enrolling family with contact information and the Homeless Informational pamphlet and community resources.
5. The school clerk/secretary will code students with the appropriate environmental code and primary night time resident code.

### **Transportation Procedures**

Transportation will be provided for the entire time the child or youth has a right to attend school, including during the pendency of disputes. The liaison shall request transportation to and from the school of origin or what is best for the child or youth. The length of the commute will only be considered in determining the feasibility of placement in the school of origin based on potential harm to the student.

1. The homeless liaison/school social worker will assist families who request transportation services to and from school.
2. The transportation department will arrange necessary bussing and inform the homeless liaison/school social worker of bus route and number information.

### **Dispute Procedures**

Upon receipt of complaints, the Federal Program Director will meet with a committee and review the complaint. All efforts will be made to ensure that policy guidelines have been followed. If a dispute arises over any issue covered in the Homeless policy, the child or youth in transition shall be admitted to the school in which enrollment is sought, pending final resolution of the dispute. The committee will render a decision and forward

the written decision to the complainant within 10 days. The complainant may appeal the decision to the Superintendent of Jefferson County Schools.

### **SECTION 13: SERVICES FOR NEGLECTED & DELINQUENT CHILDREN (NEGLECTED SET-ASIDE)**

The Title I Director of Federal Programs serves as the Neglected and Delinquent contact. The Title I Director follows the neglected and delinquent procedures based on the training provided by the Georgia Department of Education.

Jefferson County has no Neglected and Delinquent facilities. The Title I Director completes the annual Neglected and Delinquent survey each fall on the CONAPP. In the event that a Neglected and Delinquent facility is established, then the Jefferson County School System will follow the guidelines set forth by the Georgia Department of Education

### **SECTION 14: PREVENTION AND INTERVENTION PROGRAMS FOR CHILDREN WHO ARE NEGLECTED, DELINQUENT, OR AT-RISK**

The Jefferson County School System does not receive Title I, Part D, Subpart 2 funds.

### **SECTION 15: SERVICES FOR FOSTER CARE CHILDREN**

#### **Foster Care Children**

Beginning December 10, 2016, the Ensuring Educational Stability for Children in Foster Care guidance went into effect. Jefferson County works collaboratively with child welfare agencies to increase the educational stability of and to improve educational outcomes for foster care youth. The district has a foster care liaison to work with school staff and child welfare agencies. The district has a written Transportation Plan that is reviewed annually.

### **SECTION 16: TITLE IV, PART A - STUDENT SUPPORT AND ACADEMIC ENRICHMENT**

#### **Purpose**

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

- provide all students with access to a well-rounded education,
- improve school conditions for student learning, and
- improve the use of technology in order to improve the academic achievement and digital literacy of all students. (ESEA section 4101).

Private schools within the geographical boundaries of the LEA are offered equitable services for Title IV-A as part of the school system's equitable services to private schools procedure.

#### **Use of Funds**

The school system decides how funds will be spent following a needs assessment process in which a variety of stakeholders participate. Needs are then prioritized and funded depending upon the availability of funds.

### **SECTION 17: TITLE V, PART B - RURAL AND LOW-INCOME SCHOOLS PROGRAM**

## **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. Jefferson County is eligible for the Rural and Low-Income Schools Program portion of REAP.

## **Use of Funds**

The school system makes a determination of how funds will be spent following a comprehensive needs assessment process in which a variety of stakeholders participate. Needs are then prioritized and funded dependent upon the availability of funds.

## **Written Procedures for Evaluation Reports**

Once the LEA Financial Department has completed the end of year Completion Report for the Title V-B grant, the Federal Programs Director reviews the report and signs off on the report if it is correct for the budget. The Federal Programs Director then uses the Completion Report to complete the Title V-B Data Collection tab in the Consolidated Application.

## **SECTION 18 TITLE III, PART A – LANGUAGE INSTRUCTION FOR ENGLISH LEARNERS (EL) AND IMMIGRANT (IMM) STUDENTS (WHEN APPLICABLE)**

**The Jefferson County School System does not receive any Title III funds at this time; however, plans are in place if Title III funds are made available.**

## **Collaboration with Private Schools (when applicable)**

Each year, Title I is required to send the “Private School Invitation to Consult Letter” to any private school that enrolls a student who would attend a Title I school within the Jefferson County District. When applicable, Title III funds are offered to private schools within the geographic boundaries of the LEA.

## **Identification of EL students**

Jefferson County follows federal guidelines and procedures for identification of English Learners (ELs).

Included in the registration packet given to parents prior to entry into a school in Georgia, each student’s parent or guardian is given and required to complete a Home Language Survey to determine if a language other than English is used in the home or is the student’s native language or first language. All students whose native language, first language or language of the home includes a language other than English shall be assessed for English language proficiency using the state-adopted English proficiency screening measure, and The Kindergarten Screener.

Initial eligibility for language assistance services shall be determined by the student's score on the state-adopted English proficiency screening measure, The Kindergarten Screener, and WIDA Screener for students in grades 1-12.

- I. Students who have an English language proficiency score below proficient on the state-adopted English proficiency screening measure shall be determined to be English learners (ELs) and shall be eligible for language assistance services. Coding guidance for ELs can be found in the ESOL/Title III Resource Guide.
- II. Students who have an English language proficiency score at or above proficient on the state-adopted English proficiency screening measure shall be considered English proficient and shall not be eligible for language assistance. Coding guidance for non-ELs is located in the ESOL/Title III Resource Guide.

All ELs shall be assessed annually on the state-adopted English proficiency measure (ACCESS test) to determine English language proficiency. Students who score below 5.0 on the composite score of the state-adopted English proficiency measure shall continue to be eligible for language assistance services. The Jefferson County School District will utilize the notification of eligibility form posted on the GaDOE ESOL website to inform parents of their child's eligibility. These forms will be used district-wide and will be the only notification of eligibility used with the district.

### **Scientifically researched based programs and activities provided to meet EL needs**

Professional development specifically for the ESOL Director is provided through GADOE Title III Directors' Conference and the WIDA Consortium website. Professional development specifically for ESOL teachers is provided during the year by First District RESA or the school district. ESOL teachers and teachers of ELs have a yearly professional development (1 day this year) with a WIDA Consultant to more fully implement the WIDA Standards and the Amplified English Language Development Standards. ESOL teachers also participate in professional development activities provided by Metro RESA, GaDOE webinars, Kennesaw State University, and ESOL Endorsement classes.

The following are examples of scientifically research-based activities used with EL learners: graphic organizers, Essential questions to frame student learning, student summaries, Standards deconstructed, EIP classes, focused vocabulary, targeted and power standards from GMAS, standards-based classrooms, differentiated instruction, questioning strategies that focus on DOK 2 and 3 levels, spiral review, distributed guided practice concepts and skills, direct instruction, comprehension strategies that increase understanding, higher expectations in reading and math with flexible grouping for success, computer-assisted software to reinforce reading and math skills, small group instruction for targeted students, and a Migrant after-school program.

The following are examples of scientifically based programs used for Title III instruction:

The majority of the ELL students in Jefferson County are served using either the Read180, System 44, or iRead programs. These programs have shown remarkable effectiveness at increasing the academic levels of our EL students, helping them to become successful in their academic environments.

The data instruments used to assess the needs of EL students are: Georgia Milestones End of Grade (EOG) grades 3-8, Georgia Milestones End of Course (EOC), Walk Through Observation Data, Georgia Kindergarten Inventory of Developing Skills (GKIDS), End of Course Tests, WIDA Kindergarten and Grades 1-12 Screener Scores, ACCESS Scores, GAAs, IEP goals and objectives.

Jefferson County ESOL teachers disaggregate EL Assessment data by school. The ESOL Director compiles the disaggregated data by grade for the Jefferson County School System. During a Technical Assistance meeting with the administrators, the data is shared by school and system. Administrators are given a copy so that they have information on each EL student in their building. Administrators are advised that the data can be used to make instructional decisions such as after-school attendance, etc. ESOL teachers are required to make modifications on lesson plans based on the assessment data received. The lesson plans are required to be turned in once a month to the ESOL Director who monitors them for modifications for ELs.

### **Read 180**

*READ 180* Universal can help educators meet the needs of students in both general and special education through a Multi-Tiered Systems of Supports (MTSS) approach, which is a systematic framework for allocating instructional services and resources in response to students' individual academic and behavioral needs. An effective MTSS framework includes a multi-tiered prevention model, research-based programs, universal screening and progress monitoring, decision making and accountability, implementation benchmarks, professional development and collaboration between school and family.

In a sense, all students are English learners, as they all come to school with different experiences and levels of exposure to the English language. READ 180 Universal is designed to differentiate instruction and meet all English learners at their levels, whether they are speakers of other languages or other dialects such as nonstandard English, while being respectful of their first language.

The Student Application provides vocabulary supports, captioning of Anchor Videos, supports in the eReads and parent materials for five major world languages spoken in the USA (Spanish, Vietnamese, Filipino, Cantonese, and Mandarin), and Spanish translations that can help students with beginning and intermediate English proficiency levels, build background knowledge, and experience success.

The multicultural content found across all components of *READ 180* Universal reflects ethnic, cultural, and linguistic diversity, helping English learners find a sense of belonging in their new culturally responsive environment.

#### Comprehensive Support to Serve All Students

System 44 is improving the learning trajectory of over 1,000,000 students each day. Endorsed by the Council of Administrators of Special Education (CASE) as an effective reading intervention program, System 44 has a myriad of studies proving it effective for our most challenged readers.

## System 44 Compendium of Research

Elementary, Middle School and High School  
number of studies by student group\*

ECONOMICALLY DISADVANTAGED

ENGLISH LANGUAGE LEARNERS

ETHNICITY

STUDENTS WITH DISABILITIES

GOLD STANDARD STUDIES

In two Gold Standard studies, System 44 students show significantly greater gains over the control group on numerous standardized reading assessments.

10% More Reach

Proficiency 6 Points More

Percentile Gain 11 Points More

Percentile Gain 13 Points More

Percentile Gain

TWENTY-SEVEN STUDIES

75%

Elementary School Students

82%

Middle School Students

50%

High School Students

DEER VALLEY UNIFIED SCHOOL DISTRICT, AZ  
AUTHOR: SCHOLASTIC RESEARCH  
OVERVIEW

Deer Valley Unified School District (DVUSD), located in central Arizona, serves approximately 36,000 students in 37 schools, nine of which receive Title I funding. At the time of the study, 60% of READ 180 students in DVUSD were male, 47% were students with disabilities, and 26% were English language learners (ELL). Sixty percent were Caucasian, 31% were Hispanic, 4% were African-American, 2% were Asian, 2% were Native American, and less than 1% were Native Hawaiian. DVUSD adopted READ 180 to improve the reading skills of elementary and middle school students who performed at the Falls Far Below or Approaching reading standard on the Arizona's Instrument to Measure Standards (AIMS) and who also performed poorly on Scholastic Reading Inventory (SRI), a measure of reading comprehension. Additionally, students with a reading disability were placed into READ 180.

## RESULTS

AIMS Reading Test and SRI scores for 1,036 READ 180 students were obtained during the 2010–2011 school year.

Findings show that after one year of READ 180, students demonstrated significant gains on the AIMS Reading Test (Graph 1). Overall, the percentage of READ 180 students meeting the standard increased significantly from 9% in 2010 to 42% in 2011. Students in the fifth and sixth grades made the largest improvements, with the percentage of students meeting or exceeding the standard increasing by 38% and 45%, respectively.

When the results were disaggregated by students with disabilities and ELLs, these significant positive trends continued (Graph 2). The percentage of READ 180 students with disabilities meeting or exceeding the AIMS standard more than doubled—from 11% in 2010 to 27% in 2011. In addition, the percentage of READ 180 ELLs meeting or exceeding the standard increased substantially—from 6% in 2010 to 37% in 2011.

Further disaggregation of this data indicated that all ethnic groups demonstrated significant increases in the percentage of students meeting or exceeding the AIMS standard from 2010 to 2011 (Graph 3).

Consistent with the AIMS Reading test findings, READ 180 students evidenced significant gains in reading comprehension on SRI during the 2010–2011 school year. On average, READ 180 students improved from a pretest score of 312 Lexile (L) measures to a posttest score of 556L, resulting in a statistically significant gain of 243L. When the data were disaggregated by grade, all grades achieved significant



Lexile gains that exceeded annual growth expectations. In addition, students with disabilities, ELLs, and all ethnic groups demonstrated significant Lexile gains from 2010 to 2011.

PHOENIX UNION HIGH SCHOOL DISTRICT, AZ AUTHOR: POLICY STUDIES ASSOCIATES; SCHOLASTIC RESEARCH OVERVIEW The Phoenix Union High School District (PUHSD) began implementing READ 180 in the fall of 2003 to help struggling ninth-grade students become proficient readers. Students were identified to participate in READ 180 if they scored below an 8.0 grade equivalent on the Stanford Achievement Test Series Ninth Edition (SAT-9) during the spring of their eighth-grade year. An independent research firm, Policy Studies Associates (PSA), evaluated the immediate impact on three cohorts of ninth grade READ 180 students (White & Haslam, 2005). The study included ninth-grade students who participated in READ 180 during the 2003–2004 school year (Cohort 1), the 2004–2005 school year (Cohort 2), or the 2005–2006 school year (Cohort 3). Cohorts 1, 2, and 3 were each compared to matched groups of nonparticipants that were selected through propensity matching. In addition to the evaluation of the end-of-ninth-grade findings, PSA also evaluated the longitudinal impact (during the spring of tenth grade) for the first two cohorts of students, approximately one year after program participation. RESULTS Study results showed that READ 180 participants outperformed matched nonparticipants on standardized reading tests at the end of ninth grade. Cohort 1 participants achieved significantly higher average scores on the SAT-9 (31.4 NCEs) than matched nonparticipants (30.1 NCEs) in spring 2004. Likewise, Cohort 2 READ 180 participants averaged significantly higher scores on the Terra Nova (41 NCEs) than did matched nonparticipants (38 NCEs) in spring 2005. Continuing this positive trend, Cohort 3 READ 180 participants achieved significantly higher average scores on the Terra Nova than did their matched non-participating peers (39.0 NCEs vs. 38.1 NCEs, respectively). In addition to outperforming matched nonparticipants after one year of READ 180, the study found that the benefits of participation in READ 180 persisted into tenth grade for English language learners (ELL) and low-performing students who had scored in the bottom third of their eighth-grade SAT-9 Reading test. Among ELL students, READ 180 participants in Cohort 1 and Cohort 2 performed better than their matched nonparticipants on their tenth-grade AIMS Reading test in 2005. Cohort 1 ELL students achieved 654 scale score points, while matched ELL nonparticipants earned 646 scale score points (Graph 1). Similarly, Cohort 2 ELL READ 180 participants averaged scores that were significantly higher on the 2006 AIMS Reading test, one year after READ 180, than matched nonparticipants (650 and 642 scale score points, respectively). For students who had scored in the bottom third of their eighth grade tests, prior to intervention, longitudinal results in both cohorts also indicate a lasting positive impact of READ 180. For example, Cohort 2 READ 180 students who had scored below 30 NCEs on their eighth-grade SAT-9 achieved higher scale scores on the tenth-grade AIMS Reading Test, on average, than matched comparison students. Among these initially low-scoring students, READ 180 participants averaged 652 scale score points, while the comparison students averaged 648 scale score points. The difference is statistically significant (Graph 2). In a separate analysis, Scholastic Research (2006) analyzed READ 180 Cohort 3 Scholastic Reading Inventory (SRI) data disaggregated by student groups. The analysis revealed that African American participants averaged a gain of 11.9 NCEs, Hispanic participants averaged a gain of 9.4 NCEs, and all others.

### **iREAD**

Supporting the Needs of All Students While iRead is designed to be used with all students, the program is uniquely suited to support students with special education needs and English language learners (ELL). For example, iRead includes individualized, adaptive pacing, as well as instructional scaffolds and supports for students who require additional assistance, including visual, auditory, tactile, and kinesthetic means. Designed with guidance from CAST (Center for Applied Special Technology, 2011), iRead is aligned with Universal Design for Learning (UDL) principles, providing multiple means of representation, expression, and engagement (Rose & Meyer, 2002), which can benefit students with and without special education needs. In addition, the iRead program provides numerous supports to meet the needs of English language learners. For example, the program includes photographs, animations, videos, and audio support to develop vocabulary, comprehension,

conceptual understanding, and contextual knowledge. Articulation support is provided through articulation videos that model correct pronunciation of all 44 sounds of English. The program also provides vivid examples and images, giving native Spanish-speaking students at various stages of English language acquisition access to academic vocabulary and everyday vocabulary words—to ensure meaning and develop cultural knowledge. Spanish translations and/or cognates for all target vocabulary words help Spanish speakers connect new words to known words in Spanish. The eBooks also provide Spanish language previews as well as fluent read-alouds that model accuracy and expression.

Research has shown that explicit and systematic early literacy instruction—in which phonemic awareness, the alphabet, phonics, sight words, syllabication, morphology and syntax, fluency, and spelling are taught in the context of meaningful text—results in improved reading abilities for beginning readers. The Common Core State Standards (CCSS) for English Language Arts & Literacy call for all students in Grades K–2 to develop basic print concepts, phonological awareness skills, phonics and word recognition skills, and the ability to read on-level texts “with sufficient accuracy and fluency to support comprehension” (NGA, CCSSO, 2010, p. 15).<sup>1</sup> The CCSS stress that These foundational skills are not an end in and of themselves; rather, they are necessary and important components of an effective, comprehensive reading program designed to develop proficient readers with the capacity to comprehend texts across a range of types and disciplines. (p. 15) Literacy experts strongly recommend that beginning readers receive explicit and systematic instruction in foundational skills, including phonemic awareness, alphabet, phonics, the sight words, syllabication, morphology, fluency, and spelling elements—and that these skills be combined with frequent engagement with level-appropriate text (Adams, 1990; National Early Literacy Panel [NELP], 2008; National Reading Panel [NRP], 2000; National Research Council [NRC], 1998).

### **Instructional Decisions**

The data instruments used to assess the needs of EL students are: Georgia Milestones End of Grade (EOG) grades 3-8, Georgia Milestones End of Course (EOC), Walk Through Observation Data, Georgia Kindergarten Inventory of Developing Skills (GKIDS), End of Course Tests, WIDA Kindergarten Screener Results, ACCESS Scores, pre-and post-tests, GAAs, IEP goals and objectives.

Jefferson County ESOL teachers disaggregate EL Assessment data by school. The ESOL Director compiles the disaggregated data by grade for the Jefferson County School System. During a Technical Assistance meeting with the administrators, the data is shared by school and system. Administrators are given a copy so that they have information on each EL student in their building. Administrators are advised that the data can be used to make instructional decisions such as after-school attendance, etc. ESOL teachers are required to make modifications on lesson plans based on the assessment data received. The lesson plans are required to be turned in once a month to the ESOL Director who monitors them for modifications for ELs.

### **Procedures for transitioning and/or exiting students from the ESOL educational program and for monitoring their progress for a period of at least two years**

Exiting from ESOL services:

Kindergarten Students & Students in Grades 1 -12:

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 have not earned eligibility 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.

If the student is administered the **Tier A**, **Tier B** or **Tier C** version of the ACCESS and scores an Overall or Composite Proficiency Level (CPL) score of 5.0 or higher, the student will be deemed English proficient and will be exited from language assistance services. If the student scores 4.3-4.9, the student can be considered to exit on monitoring status if all stakeholders agree in a reclassification meeting. The student will be coded EL-M and his/her academic progress will be monitored for 2 years.

Then the student may be referred for a Language Assessment Conference (LAC); if so, the committee will review

- Language proficiency
- Classroom performance
- Teacher recommendations
- Criterion-referenced test scores
- Writing samples

To make a determination whether when mainstreamed, the student is likely to be successful with only limited English support. If so, the students will be deemed English proficient, exited from language assistance services, coded EL-M and his/her academic progress will be monitored and reviewed for 2 years.

The student shall be considered English proficient if the student is administered the **Tier A**, **Tier B** or **Tier C** version of the assessment and scores an Overall or Composite Proficiency Level (CPL) score of 5.0. As soon as ACCESS test results are received, an EL meeting is held and the EL Director and the EL teacher from the school make this determination. The student will be coded EL-M and his/her academic progress will be monitored for 2 years.

All students testing out of language assistance services will receive the ELL-M status and will be monitored for two years after exiting the program. The ESOL teacher in the school will be responsible for filing and maintaining the Cumulative Profile and Report Cards (one per semester) as well as ACCESS Teacher Report if the student has ACCESS Test Scores.

### **Parental Waiver of EL Services**

Parents of students identified as ELs may choose to waive language assistance services for their child; however, they may not waive the student's civil rights to equal access to education; therefore, Jefferson County Schools are still responsible for providing language support. Parents who waive services must do so in writing on an annual basis. The Jefferson County School System will use the form posted on the GaDOE ESOL website and provide it in multiple languages, to the extent practicable. The district must maintain evidence of the written documentation. [1]

If parents choose to waive services, the content-area teacher serves the student. The EL teacher should be in regular contact with the regular education teacher. The process of indirect support should be documented on paper and kept in the ESOL folder. ELs whose parents have waived services are still eligible for accommodations on standardized tests and their language skills must be assessed on an annual basis until they meet eligibility criteria.

Although the parents may have chosen to waive a formal language assistance program, the student is identified and coded as EL and will continue to be coded as such until the student reaches an English proficiency level that meets the state requirements for exiting language assistance services. ELs whose parents have waived services are still eligible for accommodations on standardized tests and their English language proficiency skills must be addressed on an annual basis until they meet the eligibility criteria.

### **Promoting parental and community participation in programs for ELs**

To encourage parent participation, EL parents are surveyed to determine which night and times are better for EL parents to attend meetings/classes. All EL parents are invited to participate in all parental involvement activities. EL parents are notified through Spanish flyers, phone calls, and/or home visits from Spanish-speaking personnel. Parent involvement strategies, parental education opportunities, and opportunities for parents to learn what goals the school is working toward as well as ways to help their children are reviewed at EL parent meetings and individual school parent meetings such as “Math and Science Night”, Parental Advisory Council, School Council meetings, and PTO meetings. Interpreters are available for meetings and, if feasible, the slides are written in English and Spanish.

In addition to the surveys and activities provided by EL, the Jefferson County Board and Title I conduct an annual evaluation of the effectiveness of parental involvement activities and what needs each individual school has for the following year.

Jefferson County Schools provide training opportunities for parents of children in Head Start, lottery-funded Pre-K, and state operated preschool programs in the community. The elementary schools provide an Open House for Head Start staff, students, and parents.

### **Parental Notification of Failure to Meet AMAO's**

The Jefferson County School District will ensure that parents of all children identified for participation in the Title III program are notified in writing of the district's failure to meet any Title III annual measurable achievement objectives (AMAOs) and that notification will be sent within 30 days after such failure occurs.

### **After-the-fact certifications**

Since ESOL does not pay salaries, there are no after-the-fact periodic certifications.

### **Student Academic and Assessment Records**

All assessment and academic records for LEP students are maintained in the student information system Infinite Campus. ESOL teachers maintain folders for all LEP students that contain the following items:

- Initial ESOL placement and continuation of services each year after (parent signature)
- Home Language Survey
- Testing Participation Committee form
- ACCESS teacher report
- W-APT for students just entering ESOL

## **SECTION 19-TITLE I, PART C EDUCATION OF MIGRATORY CHILDREN (MEP) SERVICES**

The Jefferson County School System receives services for migrant students through a partnership with Abraham Baldwin Agricultural College. Additionally, the Jefferson County School System will provide services to eligible migrant participants including advocacy, outreach services, other education, health nutrition and social services as needed. Services for all migrant children will be documented in coordination with GaDOE Regional MEP Office.

The Title IC coordinator will monitor the GADOE state portal and the student information system to ensure that if migrant students enroll in the district, they will receive services.

- All parents complete the Occupational Survey Form as part of the registration process.
- Student Services refers any potential migrant students to the MEP Recruiter.
- If the recruiter determines that a child meets the migrant criteria, the Title IC coordinator will refer the application to the Migrant Education Agency serving the district.

If the Migrant Education Agency identifies a student as migrant, they will be served in Jefferson County Schools. The Jefferson County School System will amend the Title I Budget as necessary to meet the needs of migrant students. Identified migrant students will be coded in the student information system by Title IC Coordinator.

### **SECTION 19.2 -TITLE I, PART C LOCAL IDENTIFICATION AND RECRUITMENT**

The Jefferson County School System identifies students eligible for migrant services through the following procedures:

- All parents complete an Occupational Survey upon enrollment of students in the Jefferson County School System.
- Those students identified as potentially qualifying for the MEP are referred to the MEP regional office.
- The Jefferson County School System is notified by the GADOE regional MEP if students are eligible for MEP services.
- Those students that qualify will receive services through a partnership of Jefferson County School System and Abraham Baldwin Agricultural College.

### **SECTION 19.3 -TITLE I, PART C PRIORITY FOR SERVICE NOTIFICATION**

Jefferson County Schools will notify teachers and administrators of all priority for services (PFS) migrant youth during the first month of school each year and within 2 weeks of date when students are initially identified when they enroll after the school year start date.

The template from the GADOE MEP website will be used for this notification. The appropriate Federal Programs Director will complete notification form and submit it to each building principal. The building principal will be charged with sharing notification letter with all teachers that listed as teachers of record for PFS students. The purpose of the notification is to ensure awareness and understanding of PFS status. The following document will be used:

### **SECTION 19.4 -TITLE I, PART C ENSURING MIGRANT SERVICES TO ELIGIBLE STUDENTS**

The Jefferson County School System will follow the approved Identification and Recruitment Plan to ensure that all students eligible for migrant services are served appropriately.

August - Occupational surveys are current and part of the registration packet new enrollees and back to school registration. Surveys are copied by each school and reviewed and prioritized by the school counselors and appropriate Federal Programs Director. If the form indicates possible migrant status the appropriate Federal Programs Director is notified immediately. The Federal Programs Director will forward those surveys from possible migrant families to the regional MEP office. The original copy of all occupational surveys are placed in the student's permanent school record.

### **Ongoing Activities Throughout the School Year**

- All school clerks, secretaries, and counselors review forms on new enrollees.
- Forms that indicate that a student may qualify for migrant services are sent to the appropriate Federal Programs Director, who in turn sends the forms to the regional MEP consortium office. Support services begin for the student immediately upon identification of strengths and weaknesses based on a series of formative assessments.

- Migrant students will receive tutoring to support any weaknesses in class. Tutoring will be set up in conjunction with Abraham Baldwin Agricultural College. (The tutoring has been suspended due to a lack of funding for the continuation of the program) Teachers and administrators will monitor the academic progress of migrant students throughout the school year.
- The Federal Program Director for migrant services will review the Migrant information in the GADOE portal folder and update rosters and inform schools of changes as needed.

### **SECTION 19.5 -TITLE I, PART C PROGRAM EFFECTIVENESS**

The Jefferson County School District will evaluate the effectiveness of supplemental academic and other support services provided by classroom interventions, and tutoring funded by the MEP consortium.

#### **Review of Migrant Student Progress**

- Classroom Performance – Reviewed consistently throughout the school year based on school level formative assessments and at the end each nine-weeks grading period
- Local and State Assessments – Local Assessment will be progress monitored on an ongoing basis and interventions provided accordingly; State Assessment data will be reviewed within one month of receiving results
- MEP Implementation Plans- reviewed at the end of each semester; adjustment in services will take place based on results of student progress review. These data sources will be disaggregated by migrant compared to non-migrant; migrant PFS compared to migrant non-PFS.

The district accesses and uses the LEA Annual Program Evaluation and CNA Report template found on the GaDOE MEP website to complete program evaluation.

### **SECTION 20 -INDIVIDUALS WITH DISABILITIES ACT (IDEA) - FISCAL INDICATORS**

#### **CCEIS Expenditure reports**

##### **High Cost Grant:**

- Detailed expenditure reports for high cost students
- Medicare reimbursement account expenditures, if applicable
- Student Eligibility Reports and Individualized Education Plans
- Evidence of High Cost expenditures
- 

##### **Excess Cost**

- Evidence of timely Excess Cost submission (CFM through January 22)
- Evidence of LEA met the Excess Cost requirement (CFM through January 22)
- Evidence for “other special education expenses”
- Evidence for student enrollment

##### **Partner Mentor Partnership Grant**

- Detailed expenditure reports, logs, invoices, or any other detailed documentation for matching services of \$12,500 (may include salary, travel/conference costs, professional development, other in-kind contributions)

### **SECTION 21 - INDIVIDUALS WITH DISABILITIES ACT (IDEA) - RESULT-BASED MONITORING PROGRAM INDICATORS**

[Link to Due Process Checklist](#)

## **SECTION 22 - CONSOLIDATION OF FUNDS - N/A**

## **SECTION 23 - CORONAVIRUS, AID, RELIEF & ECONOMIC SECURITY (CARES); CORONAVIRUS RESPONSE & RELIEF SUPPLEMENTAL APPROPRIATIONS (CRRSA); AMERICAN RESCUE PLAN (ARP)**

### **CARES**

The Coronavirus Aid, Relief, and Economic Security (CARES) Act was passed by Congress and signed into law by President Trump on March 27, 2020. The funding provides flexibility for states to respond to the COVID-19 emergency in K-12 schools. Funds to local school districts may be used for coronavirus response activities, such as planning for and coordinating during long-term school closures, purchasing educational technology to support online learning for all students, and additional activities authorized by federal elementary and secondary education laws.

### **CRSSA Act**

The Coronavirus Response and Relief Supplemental Appropriation (CRRSA) Act signed into law by President Donald Trump on December 27, 2020, provides an additional \$54.3 billion for an ESSER II fund. Following the same distribution as the CARES Act, which is based on the share of ESEA Title I, Part A funds follow the same use for coronavirus-response activities. Planning for and coordinating activities that address learning loss, preparing schools for reopening, testing, repairing, upgrading projects to improve air quality in school buildings, and additional activities authorized by federal elementary and secondary education laws are continually permitted.

### **ARP Act**

The American Rescue Plan (ARP) Act was signed into law by President Joe Biden on March 11, 2021, to speed up the United States recovery from the economic and health effects of the COVID-19 pandemic and the ongoing recession.

ARP ESSER funds will allow SEAs to take additional steps to safely reopen schools for in-person instruction and keep them open, and to address the disruptions to teaching and learning resulting from the pandemic. This includes using funds to enact appropriate measures to help schools to invest in mitigation strategies consistent with the Centers for Disease Control and Prevention's (CDC) Operational Strategy for K-12 Schools to the greatest extent practicable; address the many impacts of COVID-19 on students, including from interrupted instruction; implement strategies to meet students' social, emotional, mental health, and academic needs; offer crucial summer, afterschool, and other extended learning and enrichment programs; support early childhood education; invest in staff capacity; and avoid devastating layoffs at this critical moment, ensuring that all students have access to teachers, counselors, and other school personnel to support their needs.

### **Construction Projects**

It is the practice of the Jefferson County School System not to use Federal funds for construction projects. However, this practice will be suspended so that ESSER funds may be utilized for needed capital projects allowable within the grants. The District will work closely and rely heavily on the ESSER Ombudsman and staff, our State Facilities Consultant, our architect and our selected CMR on any and all construction projects to insure that all necessary requirements are met.

ESSER funds are subject to uniform CFR part 200 grant guidelines. The LEA will adhere to the following procedures:

- The LEA will submit “Expenditure Pre-Approval Form – ESSA, CARES Federal Programs” and “ESSER Construction Cost Assurance Form”
- The LEA will submit all required documentation complying with state law regarding Public Works Construction Projects with the construction manager method as the primary method for completing construction projects. O.C.G.A. 36-91-20, 36-91-21, and 36-91-22
- The LEA will revise or withdraw any state capital outlay funded projects where ESSER funding is utilized.
- The construction project will be monitored to determine if it is on schedule to be complete or is completed by the end of the grant period.
- The LEA will submit required documentation adhering to the Davis Bacon Wage Requirement for all federal contracts and subcontract over \$2,000 for construction; alterations; repairs, painting and decorating. This applies to LEAs that utilized Elementary and Secondary School Emergency Relief funding for construction costs.
- School facility repairs and improvements are to reduce risk of virus transmission and exposure to environmental health hazards, and to support student health needs (including social and emotional health needs) and inspection, testing, maintenance, repair, replacement, and upgrade projects to improve the indoor air quality in school facilities, including mechanical and non-mechanical heating, ventilation, and air conditioning systems, filtering, purification and other air cleaning, fans, control systems, and window and door repair and replacement in order to enable the operation of schools. CRRSA Act SEC. 313 (d) and ARP Act SEC. 2001

## **Maintenance of Equity**

### **American Rescue Plan (ARP) Act LEA Maintenance of Equity Requirement**

The Maintenance of Equity provision of ARP ensures that schools and LEAs serving large proportions of historically underserved groups of students—receive an equitable share of State and local funds as the Nation continues to respond to the COVID-19 pandemic’s impact. The Jefferson County School System does not meet any of the available exceptions and will therefore calculate and submit Maintenance of Equity at least annually or more often if instructed to do so.

The CFO will use the following data sources to populate both the fiscal equity and staffing equity tabs of the Maintenance of Equity worksheet provided by GaDOE:



CPI – 1 adhoc reporting exports

FTE – 1 FT002 System Enrollment

FTE – 1 FT002 System Enrollment by school

Current year budget

Prior year actuals