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APPENDIX

TITLE III/ESOL RESOURCE GUIDE

LINKS TO RESOURCES

Purpose of This Handbook

The purpose of this standard operations procedures handbook is to provide a step-by-step, systematic approach to managing the rules and guidelines of Federal Programs (Title I, Part A, Title II, Part A, Title I, Part C, Title I, Part D, Neglected and Delinquent, Title X, Part C/McKinney-Vento Act, Title III, Part A, Title IV, Part A, School Improvement and IDEA) to ensure consistent compliance. The information provided may be used by staff to ensure that Title programs are being implemented accurately and effectively.

The step-by-step approach contained in this handbook will promote uniformity in operations as employees seek to carry out official Title duties and responsibilities. The Georgia Department of Education (GaDOE) provides local educational agencies (LEAs) extensive guidance on the overarching requirements for federal programs via the on-site monitoring document that is used to ensure that LEAs are meeting all statutory requirements of Title programs. These specific requirements from the GaDOE document were used to create this handbook. Step-by-step procedures, local and state Board policies, and checklists are all included in this guide. All Principals will be provided a guided review of new/edited policies, procedures, and internal controls at the beginning of each school year. This will take place at one of the early monthly Administrative meetings before October 1.

This review is directed by the person in charge of revisions to the P&P Handbook (usually the Federal Programs Director).

It is hoped that this guide will be useful to staff as they strive to comply with all federal programs statutory requirements. Throughout this handbook, there may be blue hyperlinks to specific items of reference.

You may follow the commands to go directly to these where appropriate.
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<td>Tan Jones</td>
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<td>Jackie Hester</td>
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Section 1: LEA Federal Programs Monitoring Procedural Process

Lowndes County School System Federal Monitoring Process

Title I, Part A originated as a part of the Elementary and Secondary Education Act (ESEA) of 1965/No Child Left Behind Act of 2001 (NCLB) and now resides within the Every Student Succeeds Act (ESSA). This act provides federal funds through the Georgia Department of Education to local educational agencies (LEAs) and public schools with high percentages of poor children to help ensure that all children meet challenging State academic content and student academic achievement standards. Title I, Part A provides supplemental instructional services to schools where the resident population has a higher than average concentration of low income students. The goal of Title I /ESSA is to provide supplemental instruction in the basic skill areas of reading, language arts, and math to educationally disadvantaged students attending schools that qualify for funding. Educationally disadvantaged students are those who are falling behind their age peers in core academic areas with emphasis on reading, language arts & writing, and/or math.

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.

As a part of ESSA, the purpose of the Title II, Part A program is to increase academic achievement by improving teacher and principal quality through Evidence-based methods and models. This program may be carried out by: increasing the number of teachers with the professional qualifications in classrooms; providing Academic Coaches to support for teachers and students in the instructional programs at the school level; increasing the number of professionally qualified principals and assistant principals in schools; and increasing the effectiveness of teachers and principals by holding LEAs and schools accountable for improvements in student academic achievement. School systems must work to ensure that all students, especially poor and minority students, have equitable opportunities to be taught by professionally qualified teachers.

The Georgia Department of Education (GaDOE) requires that the Lowndes County School System monitor the implementation of federal programs and the expenditure of all funds associated with the programs. The specific requirements are as follows:

● The Local Education Agency (LEA)/Federal Programs Director/Special Education Director and Student Services (Title III, Immigrant) Director will conduct self-monitoring of schools and programs sufficient to ensure compliance with Title Program requirements, including Title I, Part A, Title II, Part A, Title I, Part D, Neglected and Delinquent, Title X, Part C/McKinney-Vento Act, Title III, Part A, Title IV, Part B, School Improvement and IDEA.

● The Federal Programs Director and other directors will undergo training from GaDOE and other sources to maintain proficiency in federal program compliance requirements.

● The Federal Programs Director will provide technical assistance to local schools and N&D facilities through school visits during the school year, at least once per semester.
The Federal Programs Director will monitor and approve all program expenditures on the requisition form to verify that all program expenditures comply with federal program requirements. This initiates the purchasing approval process and the signed requisition form by the FPD is evidence that the expenditure meets the purchasing guidelines. (The Homeless Liaison is responsible for approving purchases specific to the Homeless grant).

The Federal Programs Director will maintain all documentation the LEA may need for future auditing/monitoring according to the LEA Monitoring Form, which is issued annually by GaDOE. Electronic files and electronic signatures are an acceptable form of documentation for implementing/monitoring processes, procedures, and evidence.

In years when the LEA does not receive an on-site visit, the Federal Programs Director will complete the Self-Assessment Checklist and submit it to the GaDOE.

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

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

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

The Lowndes County School System Federal Programs Department makes use of monitoring as a means of regular observation and recording of activities taking place in the system. Critical to this process is the feedback provided to schools that can assist in improving student academic achievement. District monitoring addresses the following:

- Ensuring that all federal program activities are carried out in accordance to federal compliance guidelines
- Equipment usage monitoring
- Academic monitoring
- Budgetary monitoring
- ESSA requires the State Educational Agency (SEA) to monitor the implementation of program requirements and the expenditure of federal funds. Georgia’s monitoring process consists of four major components:

1. Monitoring of Expenditures – Local educational agencies (LEAs) must submit for approval an annual budget through the Consolidated Application process. Title I, Part A, Title I, Part D, Title II, Part A, Title III, Neglected and Delinquent and McKinney-Vento Education Program Specialists review each application and budget to ensure that expenditures are appropriate for the program area before approving
LEA budgets. Once budgets are approved, program specialists track how well LEAs are requesting funds for expenditures to ensure that LEAs are likely to meet the expenditure requirements. Single Audit – LEAs with single audit findings are flagged for technical assistance (see procedures on audit resolution).

2. On-site Monitoring – An SEA on-site Cross-Functional Monitoring Team visits a LEA to apply the criteria included in the LEA Monitoring Form.

3. Self-Monitoring Checklist – LEAs not receiving an on-site visit complete the Self-Assessment Checklist and submit it to the GaDOE.

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

- Selection of LEAs to be monitored.
- LEAs are monitored on a four-year cycle. Approximately one-third of the LEAs are monitored each year.
- LEAs are initially randomly selected from each of Georgia’s ten service areas.
- LEAs with audit or monitoring findings requiring a return of monies, or receiving a high number of complaints from parents and other stakeholders are monitored within the year of the LEA audit or monitoring report and the written complaint. For example, if an LEA is audited in FY15 for FY14 and the Division receives the report of findings in FY15 before the end of the monitoring cycle, the LEA would be included in the LEAs to receive an on-site monitoring visit. In addition, on-site monitoring outside of the scheduled cycle may be arranged as needed if an LEA evidences serious or chronic compliance problems.

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

Communication and Monitoring

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

Principals are given detailed information of expectations and copies of program guidance. Specific training is provided in all facets of Title I. A copy of the Lowndes County School System Federal Programs Policies and Procedures Handbook is provided for each principal and discussed in detail by the Federal Programs Director. This manual includes timelines, budget forms, inventory information, schoolwide/targeted assistance implementation, Flexible Learning Plans (FLPs), Intradistrict Transfers, Family & Community Engagement
guidelines, fraud policy, and other areas of federal programs as needed. Monthly meetings are also held with all administrators, including Title I principals. Title I principals are given the opportunity to share best practices during these meetings. Phone calls and emails are a daily occurrence between the federal programs staff and system staff.

In addition to meeting with principals, federal programs staff communicates with bookkeepers and Title I family liaisons throughout the year. These communications are an opportunity to discuss federal programs in detail and also an opportunity to discuss content specific information with each of the above. Family liaisons communicate regularly with the district Family & Community Engagement Coordinator.

For purchasing goods and/or services with allocated Title I, Part A funds at the school level:

1. A LCS Title I Requisition Form will be completed by the Principal/Director/designee
   (A sample form is in the Appendix)
   a. The requisition must list the person making the request, vendor information, quantity, price, and each item MUST BE REFERENCED to the School Improvement Plan goal for that fiscal year
   b. Only the FPD may sign the requisition to approve the expenditure of Title I funds
2. The requisition/request is submitted to the Federal Programs Director for approval
3. The requisition is submitted electronically into the budget system for a purchase order to be generated and the order is placed.
4. The FPD/designee will electronically release the PO for processing/payment
5. The Principal/designee will communicate with the FPD/bookkeeper when the goods/services have been received.
6. The final cost/amount of the PO is noted on an electronic budget sheet by the FPD/designee for the purchasing school and is shared with the Principal.

All Title I services are supplemental. This process is monitored through ongoing technical assistance, site visits, and through the budget process.

Onsite Monitoring Procedures

All schools are subjected to ongoing monitoring by the Federal Programs Director throughout the school year. The Federal Programs Director and the Curriculum and Instruction Team conduct on-site monitoring of all schools throughout the year for compliance. Feedback/corrective action is provided to the principals via descriptive information. In addition, emails, staff meetings, and phone conversations take place throughout the year as a means of providing ongoing monitoring/corrective actions verification, and communication with each school.
Technical assistance will include but not limited to the following topics/related documentation:

➢ Budgets
➢ Ordering
➢ Compliance Issues
➢ Family & Community Engagement
➢ Schoolwide/Targeted Assistance
➢ Monitoring
➢ Academic Achievement
➢ Instructional Specialist/Title I Teacher/ Paraprofessional Scheduling
➢ Ethics/ Fraud/ Compliance
➢ McKinney-Vento
➢ Inventory
➢ Programmatic and Financial Information
➢ Neglected and Delinquent

Timeline for Assistance and Monitoring

• May-June- The Teaching & Learning Team, along with the Chief Human Resources Officer and Principals, compile needs assessment data to be used in the revision of the Title II, Part A Equity Plan. This process culminates during Data Days where System teams and Stakeholder representatives provide input. These results help drive budgetary decisions for the coming school year(s).
• May-July- Revision/Completion of the Consolidated Local Implementation Plan
• May-August- Schools use summative tests results, parent survey results, and other needs assessment data to revise their Schoolwide and System-wide Improvement Plans. Schools involve various stakeholders in the analysis of this data and in the planning for the upcoming year.
• July- The Federal Programs Department staff attends the Principals’/Instructional Specialists’ first meeting of the new school year to discuss/reiterate Title I guidelines and requirements for the upcoming school year. The Federal Programs Director, Family & Community Engagement Coordinator, and Homeless Liaison all share information.
• July-June- Completion of time logs by split-funded employees
• July-August- Using CCRPI information determine the schools that will need to offer Flexible Learning Plan (FLPs) services (if applicable) and work with principals to create the required letters and get those mailed in a timely manner. (If applicable)
• July-August- Schools will make the CLIP available for parent/public stakeholder participation and input into the System Improvement Plans/CLIP. Advertised public meetings will be held for community stakeholder input and involvement by the FPD to allow input on the CAN/CLIP in the spring (March/ April) of each year.
• August- Annual Evaluation of Title I, Part D, Subpart 2 (if applicable)
• August- The Homeless Liaison contacts every school to update the system homeless list and to
consult regarding the needs of homeless students in our non-Title I schools. The liaison also makes sure that every school has up-to-date homeless contact information posted.

- **August-September** - The Title I, Part A Family & Community Engagement Coordinator reviews Title I Schools’ Parent Involvement Policies and Compacts. The Family & Community Engagement Checklist is used to provide feedback to principals. The coordinator also files copies of these documents in the Federal Programs Office.
- **August-October** - Principals’ Attestations and Assurances (Title IA & Title IIA)
- **August-October** - Principals present their Schoolwide plans and their School Improvement Plans to the Federal Programs Director and the Curriculum and Instruction Team. Budgets are reviewed to ensure that funds are being spent according to the plan and the plan has all the necessary components.
- **August-May** - Schools will provide opportunities for stakeholder input into the CLIP through various event opportunities held at the schools. These may include, but are not limited to: School Council meetings, Open House, Title I PIT meetings, PTO meetings. This notification and evidence of participation may be documented through, but not limited to: notices, flyers, invitations, agendas, sign-in sheets, digital responses (The FPD and/or Title I Director will oversee the effort of providing opportunities for input by stakeholders in the CLIP).
- **August – June** - Inventory all items purchased by federal programs
- **August – June** - The Homeless and N&D programs are monitored by the Coordinator of Federal Programs and Homeless Liaison.
- **September-November** - Annual Surveys of Children in Institutions for Neglected and Delinquent
- **September-May** - Central Leadership participates in walk-through monitoring in each school in the district. Walk-throughs are announced and unannounced observations to monitor implementation of system initiatives, system and/or Title IA and Title IIA funded Evidence-based professional learning implementation and school improvement plan strategies. The Coordinator of Federal Programs is a member of the walk-through team. Federal programs staff members also visit schools and N&D facilities to offer support and monitor implementation of resources.
- **November/December** - FIRST Title I school on-site monitoring visit by FDP/PIC
- **January** - Completion of first semester Periodic Certifications
- **February-March** - Federal Programs Director and staff attend GCEL conference
- **January/February** - SECOND Title I school onsite monitoring visit by FPD/PIC
- **March** - Surveys are completed by various stakeholders (parents, teachers, administrators, and community members) to provide needs assessment data for improvement planning. The Federal Programs Office sends the Annual Survey of Family & Community Engagement to parents to provide information as a means of gauging the effectiveness of Family & Community Engagement activities. The Family & Community Engagement Coordinator and liaisons compile data to determine needs for the following year. Advertised public meetings will be held for community stakeholder input and involvement by the FPD to allow input on the CNA in the spring of each year.
- **April-May** - Homeless Surveys
- **May-June** - Completion of second semester Periodic Certifications
- **May-June** - The Title I Family & Community Engagement Coordinator compiles Title I parent surveys and disseminates the results to Title I Schools for consideration in the revision of school Family & Community Engagement Policies and School-Parent Compacts.
- **June** - Federal Programs Director and staff attend annual state Title Programs Conference
- **Ongoing** - Review of school improvement data and plans in conjunction with other central office staff
- **Ongoing** - The Family & Community Engagement Coordinator holds monthly meetings with the Family Liaisons and the Parent Advisory Council.
- **Ongoing** - Budgets and purchase orders are reviewed monthly by the Federal Programs Director to assist schools in spending the funds as planned.
Ongoing- The Federal Programs Director and staff provide technical assistance and meet regularly with principals.

School Improvement Plans (SIPs) include data which drives student achievement and are monitored by federal programs and the Curriculum and Instruction Team. Based on continuous data analysis, principals and leadership teams make changes to the school improvement plans and share on the school website. The Lowndes County School System is proud to be an AdvancED accredited district.

Feedback on the schoolwide/targeted assistance plans are sent to each principal via the schoolwide checklist. Corrections to the plans are made as needed by principals and updated copies are sent to the federal programs office.

Monitoring of Neglected & Delinquent Facilities

There are two facilities for neglected students in Lowndes County: Georgia Sheriffs’ Boy’s Ranch and Raintree Village Children’s Home. The Annual Survey of Local Residential Child Care Institutions is completed annually for these facilities. Budget consultations and physical inventories are also completed annually.

Monitoring of Private Schools

Private schools are monitored by the Federal Programs Director if applicable. Invitations for private schools to consult in participation in federal programs the following calendar year are sent in October/November via receipt delivery. A meeting is held in December to present information about the programs available to private schools/students.

Data Analysis

Data review for all schools are compiled and discussed during administrative meetings and at the Board of Education meetings. Schools meet and analyze data with the intent of improving instruction. Principals are required to discuss this information with all staff to ensure that they fully understand the data presented. Principals are required to demonstrate to the Federal Programs Director and Curriculum and Instruction Team that they fully understand the needs of their schools by identifying the root cause of the problems that keep the schools from achieving academically. This information is discussed in detail in the updated schoolwide plans each year and helps to identify high-risk schools, populations, and/or specific content areas in need of additional support.

Reporting and Corrective Action Process (Audit and Monitoring Findings)

Corrective action from previous monitoring is discussed with principals in order to assist them in understanding the critical need for compliance in federal programs. In addition, GaDOE monitoring findings from all districts is shared with principals as a means of understanding the impact of non-compliance.

Technical assistance is provided based on the needs expressed in their Comprehensive Needs Assessments and is used as a preventive measure to ensure that all staff has a clear understanding of all
expectations of every facet of federal programs. The Federal Programs Director, along with district level staff and outside consultants, provide ongoing training as a means of ensuring that all staff are in compliance at all times.

Anticipatory training is conducted throughout the year that ties in directly with all facets of federal programs compliance.

**Results of Technical Assistance**

The Federal Programs Director maintains files of all training conducted throughout the year. These detailed files contain all staff training, handouts, meeting agendas, meeting notes, etc. Ongoing monitoring of the training is conducted by the Federal Programs Director to ensure compliance.

**Equipment Inventory**

All schools/facilities are required to maintain an active inventory of all items purchased with Federal Funding for any issuing grant aforementioned in the “Purpose” section of this Handbook. All items have a permanent marking—typically a bar code label. The bar code label is placed on the equipment in a location easy to see/scan. Inventories will contain all required description information as prescribed by the issuing grant, including the FAIN for the fiscal year the item(s) are purchased. The inventory is generated at the County Office/FPD level and shared with Principals for verification. This is a process of updating that occurs throughout the year as items are purchased, but is, ultimately, verified at the end of the school year.

The Federal Programs Director and staff conduct inventory checks/updates annually for all schools/facilities. Inventory purchased/provided for N&D facilities will be documented with the same procedures as for schools and the Site Director will participate at the facility in the role as the Principal of a school.

**Section 2: Consolidated LEA Improvement Plan (CLIP)**

The Georgia Department of Education (GaDOE) specifies that LEAs may receive funds under ESSA if the LEA has an approved plan on file with GaDOE. The LEA plan is submitted as part of a Consolidated Application in an on-line application. The CLIP has five (5) major components:

- District Comprehensive Needs Assessment (CNA)
- District Improvement Plan (DIP)
- Migrant Identification & Recruitment Plan
- Family & Community Engagement Plan
- Foster Care Transportation Plan

The following programs are a part of the CLIP: Title I, Part A – Programs for Disadvantaged Children; Title I, Part C – Education of Migratory Children; Title I, Part D – Programs for Neglected and Delinquent Children; Title II, Part A – Teacher Quality; Title II, Part D – Enhancing Education Through Technology; Title III, Part A – Language Instruction for Limited English Proficient (LEP) and Immigrant Students; Title IV, Part A – Safe and
Drug-Free Schools; Title VI, Part B – Rural Education Achievement Programs (REAP); Individuals with Disabilities ACT (IDEA) – Programs for Exceptional Students; Carl D. Perkins Vocational and Applied Technology Act – Vocational Education Programs; Title X, Part C McKinney-Vento Education of Homeless Children and Youth (EHCY) and State Evidence-based professional learning.

**Lowndes County School System CLIP Review Process**

The LEA Comprehensive School Improvement Plan is updated annually.

All central office directors and coordinators are required to participate in the planning, revision, and implementation process. In addition, parents and business leaders in the community are invited to serve on the revision committee. Parents of Title I schools are sent information inviting them to participate via email, flyers, website, and newsletters. Parents are asked to provide written input during this process. The C.L.I.P., is the culminating result of the Comprehensive Needs Assessment process and is included on the agenda at each Title I Family & Community Engagement Team (F&CET) meetings, as well. All schools provide the opportunity for input at other designated school events which may include, but not limited to: Open House, School Advisory Team meetings, School Council meetings, PTO meetings, etc.

The LCSS globally provides an opportunity for input from any concerned citizen relating to any topic at each LCS Board Work Session and each LCSS monthly Board Meeting, as well.

Monthly administrator meetings afford Principals and Directors to discuss relevant issues as they pertain to the ongoing improvement plans of the schools and the system. Each Director brings current and relevant information to the table and Principals are afforded time to discuss concerns, as well, with the Superintendent and the executive staff. Principals are, then, charged with disseminating the information to their respective staff, leadership teams, and PLCs and to get their feedback and input. This process is ongoing and is a component of the CLIP process.

The CLIP is a central piece of data that is reviewed and analyzed at the System’s annual data analysis effort (i.e. Data Days). This occurs soon after the conclusion of the school year and is a part of the CNA/DIP process. Stakeholder representatives from each school, the District, and community are encouraged to participate in this specific event. However, all stakeholders are provided the original plans during the period prior to classes beginning the next fall (usually during Open House). Any feedback/changes may still be made to the School/System plans if needed. Initial plans for prioritized funding are determined after the data retreat. However, final budgetary decisions are not made until after the stakeholders have had an opportunity to provide input. The final Federal budgetary decisions occur after the next school year begins.

The district conducts a survey each year that allows parents to provide input on district policies and procedures. The district Director of School Improvement and Assessment oversees this survey, and provides results to the district Federal Programs Director. From the results, the CLIP revisions are made. Parent input is examined and considered from these surveys via input from review meetings.

Documentation includes sign-in sheets, agendas, meeting minutes, emails, and returned plans with comments. Copies of comments are kept on file and put in meeting minutes.

The Federal Programs Director gathers all input and updates the consolidated application. The plan is submitted to the Superintendent for final approval.
The FPD along with other Directors and the Assistant Superintendent of Teaching & Learning will collect, review, analyze, and summarize the data that relates to their specific areas as outlined in determining progress as outlined in the Annual Needs Assessment/System’s Effectiveness Plan/Equity Plan. Data-gathering is a continuous process, but (generally) focuses on state-wide testing data that is returned to the System in the spring. This plan is driven by needs determined by achievement data, school-level data, survey results, stakeholder input, and any other qualitative data that may be available. Though this is an on-going, continuous process, the Effectiveness Plan is developed in the spring of the year (as data becomes available-May) and the Plan becomes a part of the Data Days endeavor and helps to drive individual School and System-wide Improvement Plans. The specific data collected will drive the direction or focus and will help identify specific internal stakeholders who may/will be more responsible for the development of the direction of the school/system plans. Ultimately, the Assistant Superintendent for Teaching & Learning and the FPD will monitor/execute the final drafts of the District plan and completing requirements/resolving issues for completing the CLIP. This will, also, guide prioritization for funding.

Specific personnel involved are:

- Federal Programs Director- Title I, Title II, Title III, Migrant data and policies and procedures
- Director of (Evidence-based) Professional Learning- PL needs as determined by data and are research founded, evidence based, or demonstrate a rationale
- Director of Human Resources- Identify personnel qualifications and areas of need
- Director of Special Education- Information and data for SWDs
- Director of Technology- Relates System/School-level technology status and plans for growth
- Directory of Information- Identifies areas of need as it relates to Student Information System
- Elementary Curriculum Director- Analyzes content needs based on data for PK-5
- Secondary Curriculum Director- Analyzes content needs for 6-12
- Assistant Superintendent for Teaching and Learning- Overall guidance in the CNA process
- Assistant Superintendent of Finance- Overall guidance for fiscal plan to address needs
- Director of Social Services (Lead Social Worker)- Guidance for the Homeless program and student needs
- Director of Student Support Services- Guidance in student behavior issues and school climate

Prioritizing of Needs

Principals school-level perspectives of student data Internal and external stakeholders are involved in the planning process by assisting with the prioritizing of needs. Prioritizing of needs is accomplished by analyzing the percentage of responses to various questions on the annual needs assessment. In addition, prioritizing is discussed with stakeholders during meetings. Information gathered from various meetings is discussed by the district Administration Teams, consisting of the superintendent, district directors, and principals. The Administrative Team then combines the feedback from various stakeholders and creates a final prioritized list of needs.

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

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

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

District administration and the Curriculum and Instruction Team evaluate all funded activities for effectiveness on a regular basis. This is completed through observations/walkthroughs, written evaluations, the Teacher and Leader Keys Effectiveness System, and discussions/conversations. If activities are not effective, they are abandoned.

**Section 3: Family & Community Engagement /Plan Review Procedure**

The Lowndes County School System Board of Education believes that the public schools belong to the people who create them and that student educational goals should reflect the goals of the community. The board affirms and assures the rights of all parents to participate in the development of the goals and objectives of the public schools and encourage involvement in all areas of their children’s educational experiences.

Each school has a school council committee that assists in building strategies for effective Family & Community Engagement, promoting Family & Community Engagement activities, and implementing parent recommendations and suggestions. The school council committee collects and compiles parent recommendations and suggestions. The council shares these ideas with school staff, all parents, and other stakeholder groups. All parents play an important role in the decision-making process of the school throughout the year by completing surveys, evaluations after activities, active participation at PTO meetings, parent/teacher conferences, and utilizing a parent suggestion box available at each school. All parents have access to Family & Community Engagement documents, including the Lowndes County Family & Community Engagement Policy, the individual school Family & Community Engagement Policy and Compacts, and the School Improvement Plan. Parents also make suggestions regarding expenditures of Title I funds. Program review meetings are held throughout the year. At Title I Annual Meetings, parents are informed about the needs of the school and asked to get involved by joining committees and serving as volunteers and mentors. Several times during the year, parents are invited/reminded to attend planning meetings and school activities via flyers, phone calls, weekly newsletters, websites, local television station, and car rider line conversations. When all information is available for review, parents are invited to provide input in the final review. (The School Council Committee does not make any final decisions.) All Title I Parents are given the opportunity to review and provide input in the 95 percent of the 1 percent set-aside budget expenditures for Family & Community Engagement.

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

When parents mark on the enrollment forms that they need correspondence in another language, to the extent practical, efforts are made to provide either written support or support through an
interpreter. The Title III Director supports these efforts as well as school staff who are fluent in multiple languages. Translators are available and can be used to translate documents. Furthermore, all parent communication is written in a format so that the content is easily understandable. This includes providing parent information specifically to parents of EL students. The ESOL supplement (found following the Appendix) assist in this endeavor.

Parent Notifications School Designation Status - CSI Schools

Lowndes County School System does not have any schools designated as CSI Schools. In the future, if a school does have this designation, the following procedures will be followed:

A school identified as a CSI School will receive the support of the School Improvement Division of the GaDOE. This support will be through the assignment of a School Improvement Specialist who will work with the school on a regular basis and will bring in other staff to support identified areas for growth. Support for schools needing comprehensive services will be provided by the GaDOE School Improvement Specialists.

The LEA would sign a three-year Memorandum of Agreement with the GaDOE on behalf of CSI Schools. The Memorandum of Agreement will outline a set of non-negotiable actions and interventions required of each CSI School aligned with the turnaround principles. The MOA will be developed during the spring of the year before it is to be signed in the fall.

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

School Designation Status - TSI Schools

Lowndes County School System does not have any schools designated as TSI Schools. In the future, if a school does have this designation, the following procedures will be followed:

The GaDOE will work in collaboration with the LEA to analyze student achievement data to identify the largest gaps between groups of students. Based on the analysis of data, the LEA and the GaDOE will determine the interventions required of each TSI School. LEAs will sign a Memorandum of Agreement with the GaDOE on behalf of TSI Schools. The MOA will outline a set of nonnegotiable actions and interventions required of each Focus School.

Using the U.S. Department of Education’s (US ED) definition and methodology for identification, schools identified as TSI Schools will receive school improvement support and intervention for a period of three years. Schools will be exited from TSI School status when the school no longer meets the definition of a TSI School for three consecutive years and demonstrates that the individual subgroup or subgroups that caused the school to be identified as a TSI School has decreased the number of non-proficient students by 25 percent over a period of three years.

High schools identified as TSI Schools due to subgroup graduation rates must achieve a graduation rate that falls at or above the State subgroup graduation rate average for three consecutive years or show an eight percent graduation rate improvement over a period of three years.
**Annual Title I Meeting**

All Title I schools are required to hold annual meetings at flexible times within the first month of school. It is the responsibility of the principal in coordination with the Family & Community Engagement Coordinator to arrange meeting times and invite all stakeholders to these meetings. Title I meetings cannot be combined with other events. Meetings may be announced via paper copies to parents, websites, call systems, radio announcements, and marquees at each school. The PIC will be responsible for collecting and submitting required documentation of the Title I annual meetings (flyers, sign-in sheets, agendas, evaluations and summaries) to the Federal Programs Director.

**ESSA Brochures and Notifications**

ESSA brochures/information are provided to schools. The brochures describe current flexibility waiver status. Principals revise the brochures to meet their school’s status and other personalization. Brochures are distributed to parents and documentation of when and how the brochures are sent to parents is required to be sent to the Federal Programs Director. Each school’s flexibility waiver status and CCRPI score can be located on the system/school website.

**School Allocations (including Flexible Learning Programs, if applicable)**

In the LCSS, the process to ensure equitable funding for students at all schools is provided through the application of the Weighted Full-Time Equivalency (FTE) scale. The actual funding amount assigned to each specific group is provided by the GaDOE each year. Each school is awarded funding based on the specific weighted value assigned to each specific student group/subgroup and according to the FTE count at each school for those groups/subgroups. The FTE count utilized in the distribution of funds is taken from the official FTE count that is conducted in October of the preceding school year.

All Title I CSI and TSI Schools must offer a Flexible Learning Program (FLP). In addition, all Title I CSI/TSI Schools must develop written plans that outline how the Title I CSI/TSI Schools will implement the FLP. The FLP plan must be approved by GaDOE’s Title Programs Unit prior to implementation. Each Title I CSI/TSI School is required to send notices to parents describing school’s status, share data and information used to support programming decisions, and explain how parents may become involved in improving the school. **Each Title I Priority School is required to set aside 10 percent of the school’s Title I allocation for Evidence-based professional learning.**

Focus Schools are not required to set aside 10 percent of the school’s Title I allocation for Evidence-based professional learning; however, a Focus School may set aside funds for Evidence-based professional learning if the need for Evidence-based professional learning is addressed in the school’s Title I targeted assistance or schoolwide plan.

LEAs are required to set aside a minimum of 5 percent of the LEA’s Title I allocation to implement the LEA’s FLP program in Title I CSI/TSI Schools. Set asides above the minimum 5 percent requirement may come from the LEA’s total allocation or the Priority/Focus School’s allocation and are subject to the equitable services to eligible private school students’ requirements.
Teacher and Paraprofessional Qualifications

Parents are informed of their rights to know the qualifications of their children’s teachers. This information will be sent home to every parent at the beginning of the year through student handbooks. The notice will include the specific school contact person and telephone number. This information is also available on the Federal Programs webpage.

Professional Qualifications of Teachers

If a student has been assigned to or has been taught for four or more consecutive weeks by a teacher of a core academic subject who has not met the professional qualifications of Lowndes County Schools, parents will be provided a timely notice.

- All notices and information required must be in a uniform and understandable format, including alternative formats upon request, and, to the extent practicable, in a language that parents understand. Parents may request and receive information regarding:
  - Whether the teacher has met local qualifications for the grade levels and subject areas in which the teacher teaches.
  - Whether the teacher is teaching under emergency or other provisional status.
  - The baccalaureate degree of the teacher and any other graduate certification or degree held by the teacher and the field or discipline of the certification or degree.
  - Whether the student is provided services by paraprofessionals.

Parent notification is not required for the following:

- For teachers who do not teach core academic subjects.
- For paraprofessionals who are not meeting ESSA/professional qualifications.

Principals are required to provide evidence (typically, a letter) to the parents of those students who are taught four or more weeks by a teacher who does not meet the professional qualifications in a specific content area. This process is generally referred to as the “20-day Notice”. This is to support effective parent communication. Principals will ensure that the parents of all students who receive instruction from this teacher are informed through a consistent and relevant source of documentation and will maintain records that indicate the notice was properly provided. A sample of a letter is electronically provided by the FPD for each Principal. The process consists of printing out of rosters of all students who receive direct instruction from the teacher in question. The Parents of each student receives a detailed, written notification and may be accompanied with a brief and general phone notification. All inquiries are directed to the school Principal.

Parent Advisory Committee/School Councils

Schools are required to have parent input. At the beginning of each year, the Title I Family
Liaison(s)/Family & Community Engagement Coordinator gather parent names, addresses, phone numbers and e-mail addresses to submit to the District Family & Community Engagement Coordinator, who utilizes them as the system’s Title I parent advisors. Their purpose is to review required components of the Title I program (CLIP, AYP/implementation plans, budgets, parent engagement policies and compacts). In many schools, school councils also serve as parent advisors. The school council meetings are open to the public and are announced via the newsletter, hard copy, and/or website. Parents are instrumental in the revision of the school improvement/Family & Community Engagement plans and compacts. School councils and the Parent Advisory Committee review the results of the annual spring survey and help make decisions for yearly Family & Community Engagement activities. All Family & Community Engagement meetings require a flyer, sign-in sheet, agenda, evaluation and summary report.

**Family & Community Engagement Coordination and Implementation Procedures**

Schools are required to maintain the following documentation that ensures the six requirements of Family & Community Engagement are offered:

- Dated meeting flyers, agendas, sign-in sheets, evaluations, summary reports or minutes
- Newsletter articles
- Letters to parents (multiple languages)
- Parenting class documentation

The Parent Advisory Committee begins work in September of each year. This committee assists with planning school events and activities designed to remove barriers for parents. The committee meets on a regular basis throughout the school year. In the spring, the committee assists with reviewing evaluation materials and makes recommendations for the next school year.

Parents are notified about parent advisory committee meetings via email, phone calls, schools/district website, and flyers in student weekly folders. Information is also given out about the committee during the annual meetings and parent workshops. Parents’ Involvement in Planning, Revision, and Implementation

Parents are informed verbally and by written notification that they have the right to participate and become involved in the decision-making process at Title I schools. Through parent committees, opportunities are established, and all parents are invited to participate and to provide input into deciding on activities, school improvement planning, schoolwide plan revisions, and the comprehensive improvement plan. These processes are in place to ensure parents play an active role in improving student academic achievement.

**Family & Community Engagement Activities - Planning, Revision, and Implementation Steps:**

**Provide Annual Notification to Parents:** All Title I schools conduct a meeting at the beginning of each year inviting parents to participate in the planning process. Schools distribute information on these meetings to parents via mail, email, telephone, flyers, website, and newsletters.

**Select Parents for Involvement in Committees.** Parents are invited to participate in planning Family & Community Engagement activities. Schools distribute information to parents via mail,
Conduct Annual Survey at Each School: The annual surveys serve as the means for parents to become involved in planning Family & Community Engagement activities. Surveys are conducted in the spring of each year. Schools distribute surveys electronically and through hard copies.

Evaluate Results of the Survey: Title I schools use the results of the annual surveys to determine specific needs of the parents.

Conduct District Annual Survey: At the end of each year, the district conducts an annual survey that allows for parent input. This information is analyzed by schools and allows for district input from parents.

Maintenance of Documentation: All Family & Community Engagement documentation will include dated flyers, sign-in sheets, agendas, evaluations, meeting summary report or minutes, and emails to and from parents.

School Improvement Plan Planning, Revision, and Implementation Steps:

School improvement plans are updated annually. Parents are a vital part in the planning, revision, and implementation process. Parents are sent information inviting them to participate via mail, email, telephone, flyers, website, and newsletters. (Once revisions are made, the plans are available at the schools or in the federal programs department at central office).

Maintain: Required documentation will include dated flyers, sign-in sheets, agendas, parent comments, meeting minutes, and emails to and from parents. A copy of this packet will be submitted to the federal programs office when the plan is presented.

LEA Comprehensive Improvement Plan (CLIP)

The LEA Comprehensive Improvement Plan is updated annually. This incorporates the Comprehensive Needs Assessments from each school. Parents are a vital part of the planning, revision, and implementation process. Parents are sent information inviting them to participate via mail, email, telephone, flyers, website, and newsletters. Family liaisons, PTO committee members, and school council members should also participate in these meetings. (Please see the slide show on the Federal programs webpage)

Maintain: Required documentation will include dated flyers, sign-in sheets, agendas, parent comments, meeting minutes, and emails to and from parents.

Building Parent Capacity

Information is provided to school personnel and parents on how to build parent capacity through presentations made during meetings, through response to parent needs on surveys, through information received from the GaDOE Parent Engagement department, and through student handbooks, newsletters/flyers.
The Family & Community Engagement Coordinator and family liaisons are required to consider and plan for capacity by reflecting on the following questions regarding the six types of Family & Community Engagement:

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

System-Level Title I Family & Community Engagement Policy Overview
The Lowndes County School System has an ongoing commitment to our Title I parents. Family & Community Engagement is defined as the participation of parents in regular, two-way, and meaningful communication involving student academic learning and other school activities. Our goal is to ensure that our Title I parents and their children receive extraordinary services and assistance that will lead to improved academic achievement. The system recognizes that parents are an integral part of a child’s success in school, starting with the concept of being the child’s first teacher. As a conduit for children’s success, the district will assist parents of all socioeconomic levels in solidifying their ongoing commitment to their child’s success. It has become evident that a parent can be the foremost factor in ensuring that their children accomplish and excel in the goals they set. Studies (A New Wave of Evidence: The impact of School, Family and Community Connections on Student Achievement, 2002) have shown that students with involved parents, no matter their income or background, are more likely to:

- earn high grades and test scores and enroll in higher-level programs;
- pass their classes, earn credits and be promoted;
- attend school regularly; and
- graduate and go on to postsecondary education.

One goal of the Lowndes County School System is that parents of Title I children will be actively involved in the development and review of the Title I Family & Community Engagement Plan. The system provides coordination, technical assistance, and other necessary support in the planning and implementation of Family & Community Engagement activities. The system encourages Family & Community Engagement and supports the partnership between home, school, and community by providing information about curricular expectations, student performance, and providing training and materials for parents to help their children.

Family & Community Engagement Policy
System and school Family & Community Engagement policies are reviewed and revised annually with parents and other stakeholders (teachers, principals, administrators, and other school personnel). The district will hold meetings (Parent Advisory Council) for review of the district Family & Community Engagement Policy at the central office. All Title I parents, teachers, administrators, and other school personnel in the district will be invited to the meetings.
provide input. Parent notices will be sent home from the school. Parents that cannot attend the meetings will
be given the opportunity to obtain a copy from central office and submit input before the final revisions are
approved. The Family & Community Engagement Coordinator will be responsible for collecting the
required information (agenda, meeting notes, and sign-in sheets). The district will hold the meetings in the
spring and summer to revise plans for the next school year. The LEA Family & Community Engagement
policy checklist will be applied to system and school plans. Revision dates will be clearly marked on each
plan. The Family & Community Engagement Coordinator will review plans during on-site monitoring
visits. Plans include activities/workshops that have been identified and requested through the previous year’s
annual Family & Community Engagement survey. School improvement plans and Family & Community
Engagement policies are posted on the website and paper copies are available at each school.

Each Title I school in the Lowndes County School System holds an annual Title I meeting. These meetings
give parents the opportunity to review and provide feedback on system-wide student data, parent activities,
system and school Family & Community Engagement policies, schoolwide Title I plans, and system and
school comprehensive improvement plans. Parents are notified about this opportunity through
advertisements in local media, school-level flyers, social media websites, calling systems, and the school
website. The school system uses the comments provided by parents during the annual review/revision of
documents at the parent workshops and parent advisory council. After the school system review/revision
process, system and school Family & Community Engagement policies are made available to parents at the
Title I schools in Parent Resource Centers and central office. Parents are also given the opportunity to
provide feedback about Title I programs by completing annual parent surveys. These comments are used by
the system and Title I schools when planning parenting programs.

Family & Community Engagement Procedures/ Expectations

SCHOOL LEVEL FAMILY & COMMUNITY ENGAGEMENT POLICY

Each Title I school will develop a Family & Community Engagement plan that gives additional attention to
the area indicated below:

1. Develop jointly with, and distribute to, parents of participating children a written policy describing
   implementation of the requirements in a language that is simple, concise and jargon-free and
   updated periodically to meet the changing needs of parents and the school, and such policy is
   made available to the local community.

2. Convene an annual meeting, at a convenient time, to which all parents of participating
   children shall be invited and encouraged to attend, to inform parents of their school’s
   participation under Title I and to explain Title I, its requirements, and their right to be
   involved.

3. Offer meetings using a flexible schedule, such as meetings in the morning or evening, and may
   provide, with funds provided under Title I, transportation, child care, or home visits as such
   services relate to Family & Community Engagement to eliminate Family & Community
   Engagement barriers.

4. Involve parents, in an organized, ongoing, and timely way, in the planning, review, and
   improvement of programs under Title I, including the school Family & Community Engagement
   policy and the joint development of the schoolwide program plan under
section 1114(b), except that if a school has in place a process for involving parents in the joint planning and design of its programs, the school may use that process, if such process includes an adequate representation of parents of participating children.

5. Provide parents of participating students timely information concerning:
   a. Title I programs in the school.
   b. Results of the annual school review including school performance profiles.
   c. Individual student assessment results and interpretation of those results.
   d. A description and explanation of the school curriculum.
   e. The assessments used to measure student progress and the proficiency levels the students are expected to meet.
   f. Opportunities for regular meetings to formulate suggestions, share experiences with other parents and participate as appropriate in decisions relating to the education of their children.
   g. Provide timely responses to parent suggestions.
   h. Collect all unsatisfactory parent comments regarding the Schoolwide Plan and attach those comments to the Schoolwide Plan when submitted to the LEA.

6. Provide assistance to participating parents in such areas as understanding the:
   a. State’s content standards and student performance standards.
   b. School improvement and corrective action process if applicable.
   c. Components of a schoolwide program if applicable.
   d. Components of a targeted assistance school program if applicable.
   e. State and local assessments.
   f. Requirements of Title I, Part A.
   g. Ways parents can monitor their children’s progress and work with educators to improve the performance of their children.
   h. Ways parents can participate in decisions relating to the education of their children.

7. Provide materials and training such as:
   a. Coordinating necessary literacy training and using technology from other sources to help parents work with their children to improve their children’s achievement.
   b. Training to help parents work with their children to improve their children’s achievement.

8. Educate teachers, pupil services personnel, principals and other staff, with the assistance of parents, in the value and utility of contributions of parents, and in how to reach out to, communicate with, and work with parents as equal partners, implement and coordinate parent programs, and build ties between home and school.

9. Coordinate and integrate Family & Community Engagement programs, activities and strategies with Head Start, Even Start, Reading First, Early Reading First, Title I-B, Migrant, Title I-C, Homeless, Vocational Education, and Home Instruction Programs for Preschool Youngsters, Parents as Teachers Program, Public Preschool Programs and other programs, to the extent feasible and appropriate.

10. Develop appropriate roles for community-based organizations and businesses in Family & Community Engagement activities, including providing information about opportunities for organizations and businesses to work with parents and schools, and encouraging the formation of partnerships between elementary, middle, and secondary schools and local businesses that include a role for parents.
11. Conduct other activities, as appropriate and feasible, such as parent resource centers and opportunities for parents to learn about child development and childrearing issues beginning at the birth of a child, that are designed to help parents become full partners in the education of their children.

12. Involve parents in an ongoing end of year assessment to evaluate the effectiveness of the Family & Community Engagement initiatives as a measure of performance evaluations of the school.

13. To the extent practicable, provide full opportunities for the participation of LEP parents, parents of migratory children, and parents with disabilities including providing school profiles and information related to school and parent programs, meetings, and other activities in a language and format such parents understand.

14. Provide other reasonable support for Family & Community Engagement activities as parents may request.

15. Involve parents in the joint development of the school-parent compact that outlines how parents will be responsible for supporting student learning.

16. Describe the school’s responsibility to provide high-quality curriculum and instruction in a supportive and effective learning environment that enables the children to serve under Title I to meet the State’s student performance standards.

17. Explain the ways in which each parent will be responsible for supporting their children’s learning, such as monitoring attendance, homework completion, and television watching; volunteering in their child’s classroom; and participating, as appropriate, in decisions relating to the education of their children and positive use of extracurricular time.

18. Address the importance of communication between teachers and parents on an ongoing basis through, at a minimum-
   a. Parent-teacher conferences in elementary schools, at least annually, during which the compact shall be discussed as the compact relates to the individual child’s achievement.
   b. Frequent reports to parents on their children’s progress.
   c. Reasonable access to staff, opportunities to volunteer and participate in their child’s class, and observation of classroom activities.

19. Distribute a copy of parent-school compact to parent.

**School-Parent Compacts**

All Title I schools are required to have school-parent compacts. It is the responsibility of the principal in coordination with the Family & Community Engagement Coordinator to make sure that all compacts are reviewed and revised annually. The review and revision should occur in the fall of the year. The revision date will be clearly marked on each compact. An invitation to the review will be sent home to all parents in the school, and meeting dates will be given in school newsletters and through the school’s website. The family liaison in each school will assist with setting up the meetings and collecting the required Information (agenda, meeting notes, sign in sheets, parent comments, summary report). Parent compacts will include system goals and school grade level goals for the teachers, parents, and students. Each participant must have a separate signature and date line. Compacts will be distributed to all parties involved in the fall.
of the year for signatures. Copies of the signed parent compacts are kept on file at the school and a copy is filed in the federal programs office.

**Parent Information Resource Centers (PIRC)**

All Title I schools have parent resource centers. A variety of materials and resources are available to parents for use at the school for checkout, or as handouts. Books, tapes, DVDs, and a variety of other materials have been purchased for the parents. Many purchases are based upon parent requests on the Family & Community Engagement surveys (i.e., helping with homework, information regarding bullying).

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

**Required 1% Set Aside for Family & Community Engagement**

Family & Community Engagement: Principals have the option of expending the 1% in Family & Community Engagement funds or submitting them back to the system level. Lowndes County School System invites all parents to participate in the planning of the Family & Community Engagement budget. This is conducted at spring planning meetings. Parents also give input on workshops needed to build capacity.

**School Improvement Plans**

School improvement plans are reviewed each spring for the following school year. Each school leadership team conducts meetings at which representatives from each grade level, content area, and department, as well as administration and parents meet to develop a plan. School administrators then present the plan to system leaders, and parents to develop a system improvement plan. It is through this process that the LEA oversees the development of school improvement plans. System leaders also support schools in developing, revising, implementing and coordinating school improvement and schoolwide plans. Data is analyzed to identify and develop solutions to challenges related to instructional strategies, parent engagement, Evidence-based strategies/professional learning, and budgets. Parents are involved in the planning and revising phases of the process. Parents are also sent information inviting them to participate in the revision process at annual meetings via mail, email, telephone, flyers, website, and newsletters.

Once revisions are made, the plan is placed on the school website. Hard copies are also available at the schools.

**Parent Engagement Surveys**

*Process to Collect:* The annual surveys are provided to schools by the Title I Office and The Office of School Improvement and Assessment. The system surveys are completed at the school by computer or at homes electronically. The survey data are compiled and the following year’s Family & Community Engagement activities are built from the responses.

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

*Actions Taken by LEA to Improve the Quality and Effectiveness of Family & Community Engagement Policies and Practices:*

The Title I Family & Community Engagement Coordinator, with assistance from parents will draft a parent survey. Additions/deletions/revisions are discussed and agreed upon during this meeting. The formatting or revisions are made after the meeting. If no further suggestions are made, the surveys are electronically created and distributed.

Parent engagement workshops and activities are planned for the following year from the annual spring survey results. Materials are also purchased for parent resource centers from expressed needs. Many opportunities are provided for building strong parent capacity. The purpose is to ensure effective involvement of parents and to support a partnership among the schools, parents, and the community to improve student academic achievement through, at a minimum, the following activities:

- Annual meetings and review meetings
- Conferences
- E-mail communications
- Phone calls
- Parent workshops and activities
- Family nights
- Volunteering
- Parent advisory meetings
- Open Houses
- Annual notification of school status (Flexibility Waiver)
- Newsletters/flyers/brochures
- Website information
- Board of Education meetings
- Serving on school committees

**Section 4: School Improvement (1003a) Interventions for LEAs with CSI/TSI Schools**

**CSI Schools Interventions**

Lowndes County School System does not have any schools designated as Priority or Focus Schools at this time. In the future, if a school does have this designation, the following procedures will be followed:

A school identified as a Priority School will receive the support of the School Improvement Division of the GaDOE. This support will be through the assignment of a School Improvement Specialist who will work with the school on a regular basis and will bring in other staff to support identified areas for growth. Support for schools needing comprehensive services will be provided by the GaDOE School Improvement Specialists and will be coordinated with other initiatives such as School Improvement Grants 1003(g). All supports and initiatives will be implemented at the beginning of the school year. The LEA would sign a three-year Memorandum of Agreement with the GaDOE on behalf of Priority Schools. The Memorandum of Agreement will outline a set of non-negotiable actions and interventions required of each Priority School.
aligned with the turnaround principles. The MOA will be developed during the spring of the year before it is to be signed in the fall.

**How LEA schools may exit Priority Status**

Using the U.S. Department of Education’s (US ED) definition and methodology for identification, schools identified as Priority Schools will receive school improvement support and intervention for a period of three years.

Schools will be exited from Priority School status when the school no longer meets the definition of a Priority School for three consecutive years and has reduced the number of non-proficient students by 25 percent over a period of three years. High schools identified as Priority Schools based on graduation rate must increase their graduation rate by eight percent over a period of three years. The eight-percent mark represents one-half of a deviation above the statewide annual average increase between 2003-2011.

**Focus Schools Interventions by School Improvement**

Lowndes County School System does not have any schools designated as Focus Schools. In the future, if a school does have this designation, the following procedures will be followed.

The GaDOE will work in collaboration with the LEA to analyze student achievement data to identify the largest gaps between groups of students. Based on the analysis of data, the LEA and the GaDOE will determine the interventions required of each Focus School. LEAs will sign a Memorandum of Agreement with the GaDOE on behalf of Focus Schools. The MOA will outline a set of non-negotiable actions and interventions required of each Focus School.

**How LEA schools may exit Focus Status**

Using the U.S. Department of Education’s (US ED) definition and methodology for identification, schools identified as Focus Schools will receive school improvement support and intervention for a period of three years.

Schools will be exited from Focus School status when the school no longer meets the definition of a Focus School for three consecutive years and demonstrates that the individual subgroup or subgroups that caused the school to be identified as a Focus School has decreased the number of non-proficient students by 25 percent over a period of three years. High schools identified as Focus Schools due to subgroup graduation rates much achieve a graduation rate that falls at or above the State subgroup graduation rate average for three consecutive years or show an eight percent graduation rate improvement over a period of three years. The eight percent mark represents one-half of a deviation above the statewide annual average increase between 2003-2011.

**Title I Reward Schools Programs**

At this time, there are two Lowndes County schools with a Reward School (Lake Park Elementary School and Clyattville Elementary School) designation. Procedures for Reward schools will be discussed in more detail later in the handbook.
Section 5: School Improvement 1003(g) (SIG) Priority Schools

Interventions by School Improvement 1003(g) (SIG) Lowndes County School System does not have any schools designated as Priority Schools at this time. In the future, if a school does have this designation, the following procedures will be followed.

A school identified as a Priority School will receive the support of the School Improvement Division of the GaDOE. This support will be through the assignment of a school improvement specialist who will work with the school on a regular basis and will bring in other staff to support identified areas for growth. Support for schools needing comprehensive services will be provided by the GaDOE School Improvement Specialists and will be coordinated with other initiatives such as School Improvement Grants 1003(g). All supports and initiatives will be implemented during the identified school year. The LEA would sign a three-year Memorandum of Agreement with the GaDOE on behalf of Priority Schools. The Memorandum of Agreement will outline a set of non-negotiable actions and interventions required of each Priority School aligned with the turnaround principles. The MOA will be developed during the spring of the year before it is to be signed in the fall.

Monitoring of School Improvement

All Title I schools within the Lowndes County School System conduct Schoolwide Programs. This allows all children and all parents an opportunity to have equal access to all related Title I assistance. All schools within an LEA will be involved in school improvement efforts through the work of the LEA and GaDOE.

Review and Approval of School Improvement and Schoolwide Plans

School Improvement and Schoolwide Plans are updated annually for the following school year. Each school leadership team conducts meetings at which representatives from each grade level, content area, and department, school administration, and parents meet to analyze data. During school leadership meetings, instructional strategies, Family & Community Engagement 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 (if applicable) to accomplish initiatives in their school improvement and schoolwide plans.

School administrators then present their school plans to the Curriculum and Instruction Team. The plan is monitored throughout the year through school visits, classroom walk-throughs, and attendance at school meetings.

Monitoring of Use of Funds

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

Section 6: Public School Choice/Intradistrict Transfers

*LCSS does not currently have any schools on the CSI/TSI Lists. In the event that schools are identified in the future, the following procedures will be followed for intra-district transfers:
LEAs must notify parents of the availability of the intradistrict transfer option annually. Parent notification should be dated no later than July 1 of the upcoming school year.

20-2-2131 states that LEAs must annually notify prior to each school year the parents of each student by letter, electronic means, or by such other reasonable means in a timely manner of the options available to the parent. In addition to the letter required under O.C.G.A. 20-2-2131, Title I CSI/TSI Schools’ parent notifications must be made through various forms of communication: information flyers, school/LEA newsletters, community/neighborhood newspaper, school website, school meeting, LEA meeting, teacher/parent conference, LEA website, FLP parent information packet, etc.

The intradistrict transfer option allows a parent/guardian the option to request a transfer from the child’s assigned school to a school of the parent’s choice within the school zone/district in which the child resides.

- Transfers will be granted to children only if there is available classroom space at the school that the parent chooses to transfer the child.
- Parents will report to the Lowndes County School System Office of Student Assignment at the Administrative Services Center to discuss the transfer and complete paperwork. The Coordinator of Student Assignment must verify classroom space is available at the school requested. The Coordinator of Student Assignment at the system office will send the parent a letter notifying them of the school district’s approval or denial of the request.
- Parents/guardians are responsible for the transportation to and from school if the intradistrict transfer is granted.
- Students who transferred under NCLB may stay at the school until the highest grade level.
- Georgia’s approved Flexibility Waiver allows, but does not require, Lowndes County School System to pay for NCLB Choice transportation.

**Procedure for LEA’s Process and Timelines for Receiving, Processing, and Implementing Intradistrict Transfers**

*LCSS does not currently have any schools on the Focus or Priority List. In the event that schools are identified in the future, the following timeline will be followed:

- **May**
  - Schools will send home intra-district transfer forms.
- **July 1**
  - Mail letters to parents of students at Priority/Focus schools.
- **July**
  - Meet with principals to discuss class space availability
- **July**
  - Send parent notification of acceptance or denial of intra-district transfer request.
Section 7: Georgia’s Flexibility Waiver and Flexible Learning Programs (FLP)

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

Required Interventions for CSI/TSI Schools:

- All Title I CSI/TSI Schools must offer a Flexible Learning Program (FLP).
- All Title I Priority and Focus schools must develop a written plan that outlines how the Title I CSI/TSI Schools will implement an FLP program. The FLP plan must be approved by GaDOE’s Title Programs Unit prior to implementation.
- All Title I CSI/TSI Schools are required to send notices to parents describing the school’s status, sharing data and information used to support programming decisions, and explaining how parents may become involved in improving the school.
- All Title I Priority Schools are required to set aside 10 percent of their school’s Title I allocation for Evidence-based professional learning. Focus Schools are not required to set aside 10 percent of their school’s Title I allocation for Evidence-based professional learning. However, Focus Schools may set aside funds for Evidence-based professional learning if the need for research-based professional learning is addressed in the school’s Title I targeted assistance or schoolwide plan.
- LEAs are required to set aside a minimum of 5 percent of the LEA’s Title I allocation to implement the LEA’s FLP program in Title I CSI/TSI Schools. Set-asides above the minimum 5 percent requirement may come from the LEA’s total allocation or the Priority Schools and Focus Schools’ allocation and are subject to the equitable services to eligible private school students’ requirements.

Notification to Parents of Workshop and Eligibility for Services

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

Description of Services

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

- Using school-level disaggregated data, what are the areas of weakness (content area(s), subgroup(s), and graduation rate(s), if applicable) that will be addressed by the FLP offered at this school?
- How will the LEA implement an FLP plan that will ensure supplemental academic Instructional time that is designed to support the students meeting identified goals and outcomes?
• How will the LEA provide Evidence-based professional learning (PL) for the FLP staff/consultant so instruction is engaging, enriching, and tailored to meeting the needs of the students, and is not a regurgitation of the teaching methods utilized with the students during regular instructional time?

• How will the LEA ensure that the instructional goals of the FLP students are aligned with Common Core Georgia Performance Standards?

• How will the LEA maximize the enrollment of the students in the FLP?

• How will the LEA maximize the attendance of participating students in the FLP?

• How will the LEA monitor the implementation of the program and the tracking of all the required data?

Submission of the FLP Plan

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

• A list of Title I schools that are required to offer a Flexible Learning Program (FLP), their classification as to Priority or Focus by school and LEA, and the school’s Title I status.

• A projection of how much the LEA is intending to budget on their Flexible Learning Program (FLP) in the following areas:
  - Administrative Personnel Costs
  - Supplemental Materials / Supplies - LEA office and / or School
  - Evaluation Costs
  - Transportation Costs of FLP Program
  - Instructor Costs – Current Teachers or Contract Instructors
  - Evidence-based professional learning Costs
  - Equitable Services for Eligible Private School Students, where applicable
  - Total Cost of the Public School Choice transportation (parent reimbursement and / or school buses), if applicable
  - Required set-asides
  - Other (as approved by the LEAs GaDOE Flexible Learning Program Specialist)

Budgets

• LEA’s must submit, through the Consolidated Application, the Title I, Part A Flexible Learning Program (FLP) budget as a part of the LEA’s Title I, Part A budget. The descriptions of all budgeted items must be specific and clearly describe the intent of the expenditure.

• All items budgeted must meet the allocable, allowable, reasonable, and necessary requirements described in the OMB Circulars:
  - Are the expenditures allowable Title I expenditures
  - Do the expenditures appear to be necessary in light of the LEAs goals and objectives?
  - Are the costs of the expenditures reasonable?
  - Are the expenditures for core subject areas?
• LEAs will utilize general guidelines for the use of Title I funds and equipment when submitting the budget for the FLP program. The law provides many flexibilities and opportunities for local educational agencies (LEAs) and schools to meet the purposes of Title I. In schoolwide programs, and LEA may use Title I funds for any activities that are part of the schoolwide program plan. CSI/TSI Schools may become schoolwide programs with less than a 40-percent poverty level. However, all schoolwide programs must have an approved schoolwide plan. In targeted assistance schools, however, Title I funds may only be used to meet the needs of participating children, their teachers, and their parents.

• ESSA provides several fiscal requirements that are applicable to Title I, Part A funds. Local educational agencies (LEAs) must maintain the financial effort previously provided with state and local funds to Title I schools. LEAs must provide services to Title I schools that are comparable to those of non-Title I school.

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

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

**Timeline for FLP**

- August – Develop list of eligible students based on federal tier guidelines.
- September – Mail letters home inviting eligible students.
- October – Begin serving students using a Flexible Learning Program. January – Conduct a second enrollment.
- April – Conclude program and complete evaluation.
Complaint Procedures

Any individual, organization, or agency (“complainant”) may file a complaint with the Lowndes County School System (LCSS) if that individual, organization, or agency believes and alleges that LCSS is violating a federal statute or regulation that applies to a federal program of the Every Student Succeeds Act (ESSA). The complaint must allege a violation that occurred not more than one (1) year prior to the date the complaint is received, unless a longer period is reasonable because the violation is considered systemic or ongoing.

(COMPLAINT FORM MAY BE FOUND IN THE APPENDIX AT THE END OF THIS HANDBOOK)

Monitoring and Evaluation

The LEA must submit the following components of an evaluation plan within its FLP plan in the Consolidated Application for each CSI/TSI school served:

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

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

Each FLP will be evaluated on the following dimensions:

- Participant Feedback
  - Evaluation Question: What was the overall experience of stakeholders with the program?
  - Data Source: Stakeholder surveys
- Service Delivery – Evaluation Question: Is the LEA and its FLP program in compliance with laws and regulations?
  - Data Sources: Annual monitoring data, program documentation, federal reporting, public reporting, technical assistance, etc.
- Effectiveness
  - Evaluation Question: Are programs contributing to increased student academic achievement and performance on state education standards?
  - Data Sources: Student performance on state tests, Pre-Post assessment measures of state standards and academic skills targeting by programs, Performance Flag data, and student growth in schools offering FLP.
  - Evaluation results will be shared with stakeholders and the public and used to inform ongoing program improvement.
In addition, the Federal Programs Director will make two unannounced visits to the school during the FLP per enrollment period to ensure integrity of the program. Finally, the Federal Programs Director will communicate regularly with the FLP Coordinator and Principal at each Focus School to identify and solve challenges in a timely manner.

**Transportation**

Transportation will be provided to students.

**Evidence-based Professional Learning**

Evidence-based professional learning will be provided to staff delivering the FLP to ensure appropriate instructional strategies are implemented to ensure the success of the students being served.

Documents to be maintained: sign-in sheets, agendas, and description of Evidence-based professional learning.

**Required Program Data for the LEA to be Maintained by School**

Criteria used to determine how students were selected for the program and how the subjects in which the students received intervention was determined

Rank-ordered list of all eligible students designating whether or not students are enrolled in the program. List should include students, grade levels, and subjects of tutoring. Students will be ranked based on the following federal rank order:

- FLP Rank Order1: Most academically at-risk and FRM, SWD, or EL
- FLP Rank Order2: Other most academically at-risk students
- FLP Rank Order 3: Students who are NOT most academically at-risk

- Hours of tutoring attended for each student
- Staff hours of service
- Group size for tutoring
- Pre-assessment information for each student
- Post-assessment information for each student
- Goal or plan of tutoring for each student
- Progress toward goal by student
- Strategies to be used if goals not met by student
- When does FLP occur (before/after/during school, summer, intercession, weekends)
- The days of the week the FLP occurs
- How is transportation provided and for whom
Section 8: Schoolwide Plan Development Procedure

Lowndes County School System Title I schools are school-wide rather than targeted assistance programs. This allows all children and all parents an opportunity to have equal access to all related Title I assistance.

The process to become a schoolwide school is listed below. **Process Followed to Become a Schoolwide Program**

**School Responsibility**

- Present schoolwide information to parents and staff.
- Assemble a committee of stakeholders to include, but not limited to principal, teachers, parents, business partners, etc.
- Maintain sign-in sheets, agendas, meeting minutes for each committee meeting.
- Assemble committee to write and approve plan.
- Post written plan in a language that parents can understand.

**System Responsibility**

- Submit letter of intent for each school.
- Write the Schoolwide Plan (must include the 18 components).
- Package the Schoolwide Plan.
  - Describe how the school will use resources from other sources to implement the 10 required components.
  - Describe how the school will provide individual student academic assessments in a language the parents can understand.
- Get local board of education approval.
  - When written, the schoolwide plan must be officially approved by local board of education prior to implementation.
  - By statute, only the local board of education has the authority to approve schoolwide plans.
- Fulfill program requirements.
- Maintain the intent and purpose of each federal program that is consolidated under
Schoolwide Plan.

- Uphold requirements relating to health, safety, civil rights, student and parental participation and involvement, services to private school children, maintenance of effort, and comparability of services.

**Continuation Requirements**

- Maintain documentation related to three core components (comprehensive needs assessment, comprehensive school plan approved by the local board of education and annual evaluation of program effectiveness.

- Use Title I funds to supplement educational services and not supplant those funds that would, in the absence of Title I funds, be made available from non-federal sources for the school. Funds that would normally flow to the school from non-federal sources must continue to be provided to the school.

- Conduct an annual evaluation of the implementation of, and results achieved by, the Schoolwide Plan (SWP). This evaluation must determine whether the SWP was effective in increasing the achievement of students in meeting the GPS/CCGPS, particularly those students who had been furthest from achieving the standards.

- Review and revise the plan as necessary based on the results of the evaluation to ensure the continuous improvement in student achievement.

- Make the plan available to LEA, parents, and the general public.

- Checklist is available in the appendix.

All schools are required to have school improvement plans. It is the responsibility of the principal to make sure that all plans are reviewed and revised annually. Plans must include all the components in the schoolwide and targeted assistance program checklist. Schools plans are reviewed and revised annually with parents and other stakeholders (teachers, principals, administrators, and other school personnel). Each school will hold an annual meeting where all stakeholders are given the opportunity to review the school plan and make comments. All parents, teachers, administrators, and other school personnel will be invited to the meeting to provide input. All schools will notify stakeholders in multiple ways: Notice of the meeting dates may be placed on each school’s marquee, in each school newspaper and on the website. Parents and other stakeholders will be notified by invitation sent from each individual school, and all stakeholders may be notified using each school phone messaging system.

Parents that cannot attend the meeting will be given the opportunity to obtain a copy from each school and submit input before the final revisions are approved. The Title I Family Liaison in each school will be responsible for collecting the required information (agenda, parent comments, meeting notes, and sign-in sheets). Each school will hold its meeting within the first month of school.
The school plans are typically reviewed at the annual Title I meeting in the fall. The revision date will be clearly marked on each plan (month, day, and year).

Schoolwide program checklists are used to verify that the required components are included in each plan, which includes strategies for whole school reform. On-site meetings are held with principals to discuss the current status of their plans in regard to the checklist components. Missing or items in need of revision are marked on the checklist and then rechecked when the revised plan is submitted.

Four (4) elementary schools and one (1) middle school in the Lowndes County School System are Title I Schoolwide Schools.

**Title I Scheduling Models for School-wide Plans**

A Title I school may use one or a combination of several instructional delivery models.

**In-Class Model**

An “in-class” delivery model is a Title I project in which the instructional services are provided to participating students in the same classroom setting and at the same time they would receive instructional services if they were not participating in the Title I project. Title I staff work closely with the classroom teacher to provide services which are supplemental and particularly designed to meet participants’ educational needs. Examples are: small group instruction, guided reading, teacher collaboration, extended learning, before and after school tutoring, and summer school.

**Pull-out Model**

In a Title I pull-out delivery model, students are pulled from their regular classroom to receive instruction in a Title I Reading or Math program. Students should not be out of their regular classroom reading or math instructional time for more than 25% of that time. For example, if the classroom instructional time is 60 minutes, students cannot miss more than 15 minutes of that time. They may receive as much time in the Title I lab as identified for their grade level. Title I staff work closely with the regular classroom teacher to provide services particularly designed to meet participants’ educational needs.

**Replacement/Excess Cost/Extended Pull-out Model**

This model pairs a Title I teacher with a classroom teacher. The usual class load, which in this case is composed of all Title I participants, is shared by the two teachers.

**Add-On (Extended Learning Time)**

An “add-on” delivery means Title I services are at times when participants would not otherwise be receiving state and locally-funded instructional services. This may include periods such as vacations, weekends, before or after regular school hours, or during non-instructional time during the regular school day.
Section 9: Targeted Assistance

Lowndes County School System has no Targeted Assistance Schools at this time. In the future if the district has a school which would require Targeted Assistance, this is the procedure the LCSS would follow:

In all schools selected to receive Title I, Part A funds under ESSA that are ineligible for a schoolwide program or that choose not to operate such a schoolwide program, a local educational agency serving such school may use funds received under this part only for programs that provide services to eligible children identified as having the greatest need for special assistance. The following are adhered to in the district’s targeted assistance plan:

- Restrict Title I, Part A resources to help eligible, participating students meet the Georgia Performance Standards (GPS) standards that are expected of all students.
- Ensure that planning for students served under this part is incorporated into existing school planning.
- Use effective methods and instructional strategies that are based on scientifically-based research that:
  - strengthen the core academic component of the school
  - give primary consideration to providing or increasing extended learning time, such as an extended school year, before-and after-school, and summer programs and opportunities

Eligible children are identified by the school as failing, or most at-risk of failing, to meet the GaDOE’s challenging student academic achievement standards on the basis of multiple, educationally-related, objective criteria established by the district and supplemented by the school. Selection is based on the scores of more than one test. The program has an academic component. Targeted assistance schools are required to separately identify Title I students.

These schools must meet similar requirements of schoolwide programs, such as emphasizing accelerated curricula, scheduling extended learning time, using effective methods and instructional strategies that are scientifically Evidence-based, providing adequate professional development, and coordinating the Title I activities with other school reform activities. Students must be ranked using a multiple criteria selection process.

Description of the Method by Which Children with the Greatest Need are Selected:

a. Students will be selected through multiple selection criteria. The Title I teachers will create a list of students deemed “at risk”, based upon their ranking in the following: classroom performance, test scores, and teacher recommendation. Note that preschool through second grade students must be chosen solely on the basis of the judgment of the teacher, interviews with parents and other developmentally appropriate measures examined by the teacher.

b. Children who are economically disadvantaged, children with disabilities, migrant children, homeless children, or limited English proficient children are eligible for services under this part on the same basis as other children selected to receive services under this part. In general, the following children are eligible for services:
● A child, who at any time in the two years preceding the year for which the determination is made, participated in a Head Start, Even Start, or Early Reading First program, or in preschool services under Title I.

● A child, who at any given time in the two years preceding the year for which the determination is made, received services under Title I, Part C, Education of Migratory Children.

● A child in a local institution for neglected or delinquent children and youth or attending a community day program for such children.

● A child who is homeless and attending any school served by the local educational agency.

The district would make a concerted effort to minimize removal of students from regular classrooms during the day. The needs of each individual student would be considered.

Teacher schedules, class rosters, and rankings, would be turned into the Title I office on a monthly basis.

**Procedure for Enrolling New Targeted Assistance Students**

A new student coming into the school after the school year has begun will be evaluated for placement as follows:

● Records for prior Title I services will be reviewed by the homeroom teacher and referral to the Title I teacher for possible Title I services will be made.

● If no prior Title I services are noted and the student’s records indicate that the student qualifies for Title I consideration, the regular Targeted Assistance ranking instrument will be used.
  • Upon identifying the student’s need, homeroom teacher will complete a teacher recommendation checklist.
  • Data will be collected as listed on the ranking instrument. The scoring rubric will determine the student’s placement for targeted Title I services.
    - If the student comes from out of state or a private school where no data is available, other assessment instruments as listed on the ranking instrument will be used.
  • Once ranking is completed, the student will be picked up for services as space is available and need is documented.
  • If student cannot be served immediately, then his/her name will be placed on a waiting list and the student will be rotated into services as space is available.
  • If the ranking instrument determines there is no need for immediate placement for Title I services, the student will be monitored by the homeroom teacher and assessment data will be periodically re-evaluated.

**Targeted Assistance Schools Equipment Usage**

All equipment purchases (i.e. computers, printers) by participating TA schools are to be used only by Title I teachers and eligible Title I students. A list of the Title I students must be available to ensure that the equipment is only used by these students. The district Title I department reserves the right to monitor equipment purchased with Title I funds after the school becomes a
non-participating Title I school.

Section 10: Audits

Resolution of Audit and Cross-Functional Monitoring Findings

The Lowndes County School System makes an ongoing effort to comply with all federal programs requirements. The federal programs office makes a continuous effort to cooperate with state and federal auditors and monitors. “Letter of Findings” indicates that a violation has been found, corrective action will be required and timelines for completion will be included. Either the 30-day or the 60-day timelines may be extended, if exceptional circumstances exist. The Letter of Findings will be sent directly to the complainant.

All corrective actions through the audit process or cross-functional monitoring findings are fully implemented.

Steps to Audit/Monitoring Resolutions:

Once the audit/cross-functional monitoring report is received, the Federal Programs Director will review all items. The cross-functional monitoring report will be pulled from the GaDOE website under the consolidated application.

- Each item will be examined carefully, and a team of district-level staff will determine the best means of corrective action.
- Items are gathered and a report is written by the Federal Programs Director. The report is submitted to the superintendent.
- The completed report is then sent to the GaDOE/ state auditors as a means of resolution. The district has 30 days from the receipt of the findings to respond to the GaDOE.
- The monitoring process and the resolution process are both used as a learning resource.

Section 11: Maintenance of Effort (MOE) Procedures

GaDOE compares the fiscal effort of the preceding year to the second preceding fiscal year and makes the maintenance of effort determination available to the system through a marked “met” or “unmet” on the consolidated application.

Documentation for MOE is only required for districts that do not meet the required maintenance of effort. Districts’ MOE is completed by the GaDOE.

The Federal Programs Director will pull the MOE information from the consolidated application.
Section 12: Attendance Area Determination

Rank Order Procedures. Procedure for Determining Title I Schools Comparability Eligible Attendance Area Worksheet

Comparability is to ensure that funds made available under Title I, Part A of ESSA are used to provide services that are in addition to the regular services normally provided by a local educational agency (LEA) for participating children, the LEA must provide services in its Title I schools with State and local funds that are at least comparable to services provided in its non-Title I schools. Comparability is achieved through the use of two forms of documentation: the October FTE count for the current year and the payroll distribution report. The state comparability report provided by the Georgia Department of Education is used to report the appropriate numbers to GaDOE. The total number of non-federal employees that are to be included per payroll distribution codes are counted and placed in the comparability report which automatically calculates comparability. The enrollment numbers submitted for comparability are from the October FTE count with the exclusion of prekindergarten enrollment. High Poverty Attendance Area Schools are compared to Low Poverty Attendance Area Schools. Using the student/instructional staff ratios to compare the average number of students per instructional staff in each Title I school with the average number of students per instructional staff in non-Title I schools, comparability is achieved when High Poverty Attendance Area Schools averages do not exceed 110 percent of the Low Poverty Attendance Area Schools. Included in the count are instructional teachers and support personnel, instructional paraprofessionals, music, art, and physical education teachers, guidance counselors, speech therapists, media specialists, school social workers and psychologists. No federally-funded personnel or prekindergarten personnel are included in the count; only state and local paid staffs are counted. Comparability will be determined and established no later than November 15 of each year.

1. Pull free and reduced (F&R) information from GaDOE website. Use the previous year’s first October Free and Reduced Lunch Count and the previous year’s first October FTE. The FTE count is for enrollment. The Free and Reduced Lunch Count is used for determining the number of free and reduced meals.

2. This process should take place starting in April.

3. If applicable: determine new schools or schools that are being redistricted/rezoned. Request the names of the students being moved from one school to another in this rezoning/redistricting process in order to obtain a count. This information may be obtained from The Office of Student Assignment.

4. Request the free and reduced information for students affected by moving to a different school due to a new school opening or redistricting/rezoning. This information is obtained from the Nutrition Department.

5. For each school, list the schools receiving students and indicate the number of free and reduced lunch students.
Example:

<table>
<thead>
<tr>
<th>ABC School (receiving students from schools listed below)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Students From</td>
</tr>
<tr>
<td>XYZ School</td>
</tr>
<tr>
<td>EFG School</td>
</tr>
</tbody>
</table>

6. Place all information for all schools in the district on the large spreadsheet

7. FY 16 Worksheet for Determining the Number of Students Moved Due to Redistricting for 2016-2017.

8. Complete Worksheet for Determining the Number of Students Moved.

9. Complete the Worksheet for Eligible Attendance.

10. Use this information to complete the Eligible Attendance Worksheet which will be a required attachment to the Title I Consolidated Applications process.

**Section 13: Allocations and Carryover**

**Procedures for Determining Carryover:**

The Federal Programs Director tracks the spending of each program/school through the year via budget sheets.

At the end of the school year, carryover information is updated and reviewed. Family & Community Engagement, Flexible Learning Programs (FLP), and professional development for Focus and Priority schools are taken into consideration.

Funds are redistributed based on GaDOE criteria.

A copy of the GaDOE enrollment report is placed in file.

**Procedures for Determining Allocations:**

**Equitable Allotments for Schools**

In the LCSS, the process to ensure equitable funding for students at all schools is provided through the application of the Weighted Full-Time Equivalency (FTE) scale. The actual funding amount assigned to each specific group is provided by the GaDOE each year. Each school is awarded funding based on the specific weighted value assigned to each specific student group/subgroup and according to the FTE count at each school for those groups/subgroups. The FTE count utilized in the distribution of funds is taken from the official FTE count that is conducted in October of the preceding school year.

**Title Allocations**

After receiving notification of the Title I, Part A grant amounts from GaDOE, reservations in each budget are set aside for required components such as Family & Community Engagement, Evidence-based professional learning, neglected and delinquent, private school per pupil and equitable services, and homeless students. Administrative costs are also part of the reservations,
which are not part of the schools’ per pupil amounts.

Per pupil amounts are allocated to schools in rank order of poverty based on the number of children from low-income families who reside in eligible attendance areas (children eligible for free/reduced price meals under the Richard B. Russell National School Lunch Act). Low income is determined by the number of free or reduced lunches at a school using the previous year’s October FTE count. Higher ranking schools receive the same amount or more than the schools ranked below those schools. The per pupil allocation is always large enough to provide a reasonable assurance that each school can operate its Title I program of sufficient quality.

Typically, carryover funds are allocated in one of two ways:
(1) to schools by increasing the per pupil amount maintaining rank order, basing that amount on the total number of children from low-income families in each area or
(2) the funds are allocated back to all the schools on an equal basis and each school is given an opportunity to spend the funds. Either way, schools must submit a written description of the expenditure requests. Set asides are recalculated for private school per pupil amounts.

Equitable services are also recalculated depending on an allocation of funds for district-level activities.

Budget sheets are monitored regularly throughout the year and calculations are made from these near the end of the school year to determine that no more than 15% will be carried into the following year. Should carryover occur in private school set asides, those amounts will be added to the following year’s private school set aside funds.

**Title I, Part A funds are used to fund all eligible schools in the Lowndes County School System that qualify as School-wide Schools. The Lowndes County School System uses Grade Span Grouping when considering support and serves these schools in rank order (highest to lowest poverty) according to their gradespan, K-5, 6-8, and 9-12.**

Set asides are determined by program requirements for: Family & Community Engagement (F&CE) which includes the mandatory 1% set aside, Homeless, Neglected & Delinquent (N&D), and Private Schools. F&CE carryover will be determined each year through the completion of a carryover worksheet.

**Section 14: Reservation of Funds**

**Flexible Learning Programs (FLP):** The Lowndes County School System has no Focus Schools for FY 20.

**Professional Development:** In order to promote continuous school improvement, the Lowndes County School System will continue to pursue professional development to strengthen best practices in all classrooms. Research-based professional learning activities will be prescribed through an evidence-based design and will address the need areas identified by the System-and School Improvement Goals.

**Family & Community Engagement:** A minimum of 95 percent of 1 percent of the entire Title I allocation is given to schools. Principals have the option of expending the one percent or submitting it back to the system level. Should a principal decide to direct those funds to a
In the spring of each year, all Title I parents are asked to participate in completing a parent survey. Using this survey, parents are asked to make suggestions as to how Title I funds should be used.

These suggestions are collected and shared with school principals, parents, school council, other school-level committees, and the parent advisory council committee at the district level. This information is compiled and then used to plan activities for the next school year. Any suggestions that may be appropriate for the remaining portion of the school year will be considered and implemented where appropriate. Throughout the school year, Title I funds are used to purchase workshop materials for parents who attend school-level and district-level activities. Title I funds are used to fund the district-level Title I Annual meeting/Family Day Event (5 Title I schools), Home School Connection Newsletters for 5 Title I schools, and brochures and educational reading materials to help engage parents in the educational process of their children.

In May, parents receive an invitation to attend an end of the year assessment meeting to review previously collected suggestions from surveys, suggestion boxes from Title I schools, and evaluations from activities offered earlier in the year. Parents at this meeting review a PowerPoint presentation explaining the CLIP. After the PowerPoint presentation, parents are afforded the opportunity to make suggestions about use of Title I funds. Parents also use this time to review/revise the district level Family & Community Engagement policy and make suggestions for the new calendar year regarding activities and use of Title I funds for students and families. Additional information is considered when the School Improvement Plan is reviewed/revised. (All parents and stakeholders have an opportunity to participate in this process).

In the fall, parents are provided an explanation about how Title I funds can be used to support Family & Community Engagement activities. Parents are extended an invitation to ask questions and provide feedback regarding the use of Title I funds. Parents are asked to get involved in planned committees, join PTO or school council, and become a volunteer and/or mentor in the school. Also in the fall of each year, Title I Annual meetings are held at individual Title I schools to inform parents of their rights to be involved in their child’s education. Parents are asked/invited to become active partners in the school. Suggestions to serve include serving on various committees, assisting in the school where needed such as proctoring and planning activities, serving as mentors and/or tutors, etc. Parents are also asked to provide suggestions for program improvement throughout the school year.

Title I, Part A Districtwide Parent Activity-Project Assurance

To comply with federal guidelines, districts that receive an allocation of more than $500,000 must reserve 1 percent of their total allocation. Ninety-five percent (95%) of the 1 percent must be allocated directly to participating Title I schools.

An exception may be made to this provision if participating Title I principals agree to pool all or part of their Family & Community Engagement allocation for a district-level Family & Community Engagement activity/project.

Districts with schools exercising this flexibility must provide supporting documentation on the Attachments Tab of the Consolidated Application budget.
Homeless Children and Youth: The federal programs office is required to set aside a portion of Title I funds to meet the needs of homeless children and youth. The Federal Programs Director and the Homeless Liaison consult with and train all school personnel including counselors, Family & Community Engagement Coordinator, clerks, teachers, principals, and bus drivers to identify children in homeless situations. A home survey is also used to identify homeless students.

The Federal Programs Director and Homeless Liaison are consulted if a student is found to need transportation to a school of origin and one of them will make arrangements through the transportation department. Needs assessments are conducted by school-level homeless contacts when a child is identified as homeless; the contacts then work with the homeless liaison and community agencies to meet those needs. The McKinney-Vento Homeless Grant assists with transportation, Evidence-based professional learning for homeless contacts, as well as provides school supply kits and hygiene kits for homeless students in need.

Neglected and Delinquent Children: The reservation amount provided by GaDOE in the Title I, Part A allocation letter and worksheet is the amount set aside for neglected and delinquent children. Currently, there are two neglected sites in Lowndes County. These sites include Raintree Village Children’s Home and the Georgia Sheriff’s Boys Ranch. The Annual Survey of Local Institutions for Neglected and Delinquent Children is completed each year and is based on the number of children residing at the home for 30 consecutive days with at least one day being in October.

Private Schools: If Lowndes County School System ever has any private school to choose to participate, all Title I regulations for private school participation will be followed. The private school worksheet would be completed and attached to the Consolidated Application to ensure that all reservations related to Family & Community Engagement, instructional lead teachers, Evidence-based professional learning, and paraprofessionals have been reserved.

The district uses the information provided by GaDOE to determine reservations for Family & Community Engagement, FLP (if applicable), private schools, indirect cost, and neglected and delinquent.

Professional Qualifications Request for Lesser Amount

The Lowndes County School System is not required to develop an improvement plan or restrict the use of federal education funds pursuant to such a plan, and the state is not required to provide Lowndes County School System the technical assistance that would be required to develop such a plan. Additionally, the state is not required to enter into the agreement required with an LEA. Finally, Lowndes County School System is not restricted in its use of Title I, Part A funds for paraprofessionals, but still must comply with the requirements with respect to paraprofessionals in ESSA.

Requirements of Paraprofessionals

- All paraprofessionals hired after January 8, 2002, hired with Title I, Part A funds or employed in a Title I, Part A schoolwide program and assisting with instruction must meet one of the following requirements prior to hire:
  1. Completed at least 2 years of study at an institution of higher education.
  2. Obtained an associate’s degree (or higher).
3. Met a rigorous standard of quality and can demonstrate through a formal state-approved assessment, the knowledge of, and the ability to assist in instructing, reading, writing, and mathematics, or assisting in instructing and the readiness of above named subject areas, as appropriate.

- All paraprofessionals working in a Title I, Part A funded program, including a Title I, Part A schoolwide program, shall have earned a secondary school diploma or its recognized equivalent.
- Title I paraprofessionals will not be assigned a duty inconsistent with duties outlined ESSA.
- Paraprofessionals work under the direct supervision of a teacher

**Section 15: Expenditure of Funds**

**Financial and Program Policies and Procedures**

**Lowndes County School System Approach for Purchases**

The school system shall give preference in its purchases as may be reasonable and practical to local businesses and to such materials, supplies, equipment, services, and agricultural products as may be manufactured or produced in the State of Georgia. Such preferences shall not sacrifice price for quality.

The approval process for federal budgets is as follows:

- Funding amounts are approved by the GaDOE Board of Education.
- Award letters are sent to districts.
- **Schools are given the allocated dollar amount for budgeting to be spent within that fiscal year.**
- The budget is entered into the GaDOE Consolidated Application (electronic grant application process) by the program coordinator or authorized staff.
- **The budget is approved by the program coordinator based on the assessment of reasonable, necessary, allowable, and allocable (as determined by the Comprehensive Needs Assessment/Improvement Plan).**
- The budget is approved by the superintendent (budget may be rejected at this level and requests for revisions may be made).
- The budget is approved by the program specialist at the GaDOE (budget may be rejected at this level and requests for revisions may be made).
- The budget amount is approved by GaDOE Accounting.
- The budget is adopted by the district BOE.
- The approved budget is uploaded into the System’s accounting program and is designated as the original allocations for each budget area. As amendments occur, entries may be made to make adjustments within the budgeting system.

**Accounting Protocols for Title Programs — Internal Controls Purchases and Requisition**

**Process (Procurement):**

1. Each Federal budget, after being prepared at the system level, is reviewed by each principal, revised if necessary, and approved by the Federal Programs Director (FPD). Once the budget is submitted and approved by the state, each school or
department initiates the purchasing process as it aligns with their SIP/DIP goals.

2. The Principal or designee initiates the requisition form, complete with:
   - vendor information including phone number (and fax number if applicable)
   - ship to information including the address for the school
   - Corresponding School Improvement Plan goal is referenced on the requisition
   - Principal or designee assigns the appropriate account number based on the budget sheets
   - Only the Principal’s/designee signature under “Ordered By” line
   - The requisition is then sent to the Federal Programs Director for review.
     
     (Signature of the FPD indicates allowability and is given to the bookkeeper for processing)

3. The Federal Programs Director then signs off on the requisition and sends to the bookkeeper for processing.

4. The order is processed and delivery of goods/services is delivered (generally, directly to the school or department). The school will send a copy of the packing slip/invoice to the Federal Programs office in order to process payment.

5. All Title II, Part A, Title I, Part D and McKinney-Vento grant expenditures/purchase orders are authorized and signed-off by the Federal Programs Director.

6. In the LCSS, some federal and non-federal purchases are made at the location level (i.e. school-level, department-level, etc.). Principals and Directors are entrusted with the authority to manage purchases under $50,000 including “micro-purchases” (defined as $10,000 or less). According to Board policy, any purchases between $10,000 and $49,999 should solicit three (3) competitive quotes (if available). Similar steps are followed in requisitioning these purchases as those with Federal funds. Attention is exercised when looking for items needed to successfully implement or maintain efforts within the school and/or department level and meets the four-pronged test of reasonable, necessary, allowable, and allocable. Expenditure of funds must be allowable and reasonable in accordance with OMB Circular A-87 and EDGAR 2 CFR Part 200. LCSS recognizes and will take advantage of the Federal grace period to fully comply with EDGAR CFR 200 guidelines by FY 19. Under this grace period through FY 18, we adhere to OMB A-87 for Federal compliance purposes.

7. GUIDANCE FOR PURCHASES:
   - **Micro-purchase:** Purchases where the aggregate dollar amount does not exceed $10,000 (or $2,000 if the procurement is construction and subject to Davis-Bacon). When practical, the entity should distribute micro-purchases equitably among qualified suppliers. No competitive quotes are required if management determines that the price is reasonable. **Small purchase:** Includes purchases up to the Simplified Acquisition threshold, which is currently less than $150,000. Informal purchasing procedures are acceptable, but price or rate quotes must be obtained from an adequate number of sources.
   - **Noncompetitive proposals:** Also known as sole-source procurement, this may be appropriate only when specific criteria are met. Examples include when an item is available only from one source, when a public emergency does not allow for the time of the competitive proposal
process, when the federal awarding agency authorizes, or after a number of attempts at a competitive process, the competition is deemed inadequate.

**CONFLICT OF INTEREST (COI)**

Employees of the Lowndes County School System are not automatically disqualified from submitting bids to advertised business opportunities/contracted services based on the fact that they are LCS employees. However, there are basic stipulations that apply to all vendors submitting for consideration—including any LCS employee wishing to be considered—for a contracted event:

- The vendor/employee must provide a current business license in the field/area being considered
- The vendor/employee must provide proof of professional insurance for the services to be rendered
- The performance of the contracted service must be done off of contract time and does not coincide/conflict with the terms of the original employment duties & responsibilities
- The employee requesting consideration for the bid may not participate in any form or fashion in the selection, awarding, and/or administration of the contracted service
- (This specific element in the Conflict of Interest would also include great consideration to others who may be involved in the same consideration for a contract. This element would compliment the other definition of Conflict of Interest included in this Handbook that relates to the personal relationships of those who may be involved/affected by the services to be provided).
- Anyone who suspects a violation in the COI procedures should report to the immediate supervisor or the next above person in the chain of command

**PURCHASE ORDER PROCEDURES**

- Purchase orders must be approved before orders are placed.
- Purchase orders specifically designed to serve school-level needs must be approved by the facility principal. Any purchases are made with Federal funds must be approved by the FPD. Any bid or proposal for goods or services valued at or above $10,000 shall be advertised in the Georgia Procurement Registry
- Purchase orders/purchases which are drawn from federal or specific grant funds must be approved by the Superintendent's designee(s) (usually a Director of the specific grant involved).
- Purchase orders totaling between $10,000 and $49,999 must be submitted after three quotes (If available) and approved by the Superintendent/designee.
- Purchase orders totaling more than $50,000 must be determined through a sealed-bid process and approved by the Superintendent/Board.

1. Only those items included on a purchase order will be paid from that purchase order. Cancellations and substitutions should be noted on the blue copy and another purchase order issued if total prices are different.

2. Estimate shipping costs carefully or have vendor quote shipping. Purchase order total
should always reflect the total cost of the items including shipping or other service charges.

Large delivery items and back orders should be cleared as soon as possible. Cancel purchase orders after 30 days and reorder. When purchase order is cancelled or items are returned, notify central office in writing and attach a copy of correspondence sent to vendor. This is necessary in order to give proper credits when received from vendor. Final purchase orders issued near the end of the year must be invoiced on or before June 30 to be included in the current fiscal year. No monies will be carried into the new fiscal year without being deducted from the new budget.

Purchase orders are not complete for files until the blue receiving copy is signed, dated and returned to central office by purchaser.

Copy Distribution:

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<thead>
<tr>
<th>Original</th>
<th>(White)</th>
<th>To vendor</th>
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<tbody>
<tr>
<td>Finance Copy</td>
<td>(Yellow)</td>
<td>Retain at County Office</td>
</tr>
<tr>
<td>Receiving Copy</td>
<td>(Salmon)</td>
<td>Sign and return to central office when order is complete</td>
</tr>
</tbody>
</table>

(Salmon) copy will be returned to school/department after approval. White copy can then be mailed/faxed by the County Office.

NOTE: Failure to comply with the above procedures could result in liability on the part of the purchaser to pay for the purchase order items. Examples are purchase orders made over the phone without prior approval or when invoices are received from vendors before purchase orders are approved and on file in the Central Office.

There shall be no exceptions to the General Purchasing Policies except as granted in writing by the Superintendent of Education or designee.

An emergency is defined as an eventuality that:

1. Cannot reasonably be foreseen;
2. Demands correction by immediate action and if not corrected, may endanger students and/or others, or result in an economic loss to the school system.

Poor planning may create a inconvenience, but such does not constitute an emergency. Adherence to these procedures along with attentive management helps prevent the loss, or damage to all assets (including funds, equipment, and materials).

The Superintendent of Schools, or designee, has the authority to make emergency purchases in
the open market without prior submission of purchase order. Whenever possible, competitive quotations will be solicited before obligating the school system, and the Superintendent, or designee, shall inform the Board of Education of all emergency expenditures.

**PURCHASING/TRAVEL EXPENSE STATEMENTS (including Federal Funds)**

- Fill out the employee information at the top of the expense statement. You must complete all parts, ex., SSN, Headquarters, Auto License #....
- The date, departure time and arrival time must be completed for each day you are claiming travel. Identify the location of departure and arrival for each date.
- One month per expense statement.
- With permission of the CFO, purchases may be made with a county purchase card and funds will simply be transferred to cover expenses and no personal reimbursements made.

**Mileage**- Mileage allowance is (locally determined) $0.45 per mile all travel. Parking fees at conference sites are reimbursable, but require a receipt. In the case of where a District vehicle is used, reimbursement will be made through a journal entry and funds will be assigned back to the District's travel funding account.

**Meals**- Meals are reimbursed at $6.00 for breakfast, $7.00 for lunch, and $15.00 for dinner. Travel regulations have been revised to allow a higher meal reimbursement for high cost areas in Georgia. Reimbursement in Atlanta, Augusta, Brunswick, Savannah, and out-of-state will be $7.00 breakfast, $9.00 for lunch, and $20.00 for dinner.

  - **Breakfast** - Reimbursement will not be allowed unless employee departs prior to 6:30 am.
  - **Lunch** - Generally, lunch is not reimbursable except when the meal is an integral part of the conference.
  - **Dinner** - Generally, employees will not be reimbursed for the evening meal unless they return to their headquarters after 7:30 pm. Employees will be reimbursed for meals if they were away from home on a work assignment for more than 12 hours.

**Lodging**- Lodging expenses may be reimbursed. Employees are required to attach hotel/lodging receipts to their expense statements. **When registering for lodging the employee should claim exemption from the local hotel sales tax** (if applicable). The appropriate form is available from the Central Office in paper form. Failure to submit the form at registration will result in the employee having to pay the hotel tax since it is **not** reimbursable. It is permissible to use rental properties (like VRBO, AirBnB, HomeAway, etc.) if they pose a substantial savings over traditional lodging options (even in lieu of the aforementioned sales tax consideration).

The fund code from which reimbursement is being paid **must** be included in the appropriate area.

**Check with the administrator authorizing the travel to ensure funds are available and are reasonable consistent with GSA 48 CFR 31.205-46a**

**Secure Approval**

The employee’s supervisor must sign the employee expense statement before it is submitted to the appropriate authoring designee. An agenda must be attached to the expense statement.

**Timeline for Approval and Payment**: All expense statements should be submitted to the Federal Programs Department **within 30 days of the time the expense incurred**. When this time frame is followed, expense checks should be printed within 5-10 days. Expense statements received after 30 days may be declined for payment or added into the regular paycheck (subject to taxes/fees).

*If an expense statement is not completed correctly, it must be returned to the employee.*
**Stipends (including Federal Funds)**

1. The principal/director is required to submit a description of the stipend and a list of personnel receiving payment to the Federal Programs Office.

2. At the completion of the Evidence-based professional learning, the principal/director includes the requisition for payment of stipends.

3. The Federal Programs Director/Director of PL (If paid with non-Title funds) reviews the requisition to verify the Evidence-based professional learning is part of the schoolwide plan/System-wide plan. Once approved, the principal writes a memo to the Federal Programs Department requesting payments for the stipends for the Evidence-based professional learning with time sheets attached, and with the appropriate account number.

**Accounting Protocols Specific for Priority or Focus Schools**

*Lowndes County does not have any schools designated as Priority or Focus at this time. In the future, if a school does have this designation, the following procedures will be followed:

**Purchases and Requisition Process (Segregation of Duties):**

1. Each school budget is developed by the school and district leadership teams.
2. The principal sends a request to the Federal Programs Director of the item needed at his/her school.
3. The Federal Programs Director, along with the district leadership team, reviews the request to ensure it complies with the school and district improvement plans.
4. The Principals/Federal Programs Director initiates the Requisition Form, complete with vendor information including phone number (and fax number if applicable), shipping information including the address for the school, department indicating Title I School Improvement, the appropriate account number based on the budget sheets and GaDOE approved list of function/object codes.
5. The Federal Programs Director then signs off on the requisition and forwards the requisition to the Finance Director for review.
6. The Office of the Finance Director then reviews the requisition and signs off to verify appropriate budget amounts and account numbers on the requisition.
7. The Finance Director forwards the requisition to the Purchase Order Clerk.
8. The Purchase Order Clerk assigns a P.O. number, logs the P.O., and orders the merchandise.
9. The Purchase Order Clerk returns the P.O. to the school or department that made the requisition.
10. When the merchandise arrives, the school or department then signs that the merchandise is accounted for and returns the P.O. to Accounts Payable for payment.

**Crowdfunding**

Many schools and classrooms are realizing the benefits of crowdfunding. **Crowdfunding** involves the posting of projects or needs online with the expectation that people will contribute small amounts toward the fundraising goal. On some fundraising platforms the result of the fundraising campaign is the delivery of specific items named in the project description (as with Donors Choose). Other platforms cash out a completed campaign with the transfer of funds to the originator of the campaign.
Crowdfunding that results in the transfer of funds represents needless entanglements and risk to our employees. Crowdfunding for school or classroom projects through such platforms as GoFundMe is not permitted. In those cases where school communities wish to raise funds directly for the needs of a family or a student, those crowdfunding activities cannot be undertaken by school system employees.

DonorsChoose.Org is one non-profit entity that provides teachers the opportunity to acquire needed items for their classrooms, from Chromebooks to reading nooks. To eliminate potential confusion about these donated items, here are some basic guidelines to keep in mind when requesting and receiving items from DonorsChoose.

- The system employee shall inform the building principal of the fundraising request and post only with the principal's approval. The employee should then provide the building principal a copy of the fundraising project as posted.
- For any project that will result in the purchase of classroom technology, the employee must obtain pre-approval of the Technology Director for the item(s) requested. The Technology Department can make recommendations on models and types of equipment that are compatible with our network and that we can manage and support. [Note that Chrome OS devices in a DonorsChoose project must also include the Google Management License in order to be added to our Google management system and used with our programs.]
- For any project that will require construction or a change in infrastructure to implement, the pre-approval of the Facilities Director must be obtained.
- It should not be expected that consumables for donated items will be provided by your school or the district.
- Once posted, the fundraising campaign should be promoted schoolwide and will be shared on a system web page for open crowdfunding projects. [Marketing of a crowdfunding project should not be targeted specifically to the parents of students in the teacher’s class].

The DonorsChoose program specifies that any materials received through the program become the property of the classroom at the school of the teacher who requests them. Procedures are in place for transfers within a school or district, but the donated materials do not become the personal property of the teacher and will remain with the school district if the teacher ceases to be employed by the system.

Any equipment will be added the school’s inventory, and technology items will be asset tagged and added to the system technology inventory. Items shipped directly to teachers should be taken to the school media specialist in order to be logged into the school's inventory and appropriately labeled. Any network/license configuration of technology items will be done by technology staff before the items are used in the classroom.

**Split-Funded Personnel (Time & Effort)**

Salaries and wages of employees who work on federal programs may be paid with federal funds as long as appropriate “time and effort” records are maintained. (These are also referred to as “time distribution” records.) Charges to Federal awards for salaries, wages and/or stipend benefits must be based on records that accurately reflect the work performed. The rules for documentation vary depending on whether the employee is working on a single cost objective or multiple cost objectives. The difference between single and multiple cost objectives is determined by how an employee works, not how the employee is funded. Time & Effort reporting is not time cards which compensation is determined. T&E documentation must be collected from all federally funded grant employees, including administrative, certified and support staff. The Periodic Certification form is completed for personnel who are fully funded by federal funds (detailed further in this section).

**Split-funded personnel are required to maintain a time log (PAR)** delineating the specific federally funded duties performed. The format used is an electronic time log from the GaDOE. Other forms of documentation to compliment the electronic time log may be a journal, calendar with specific duties/events, or any other relevant source of documentation. This is submitted monthly and signed off by the
appropriate supervisor. Periodic Certifications will be completed on any employee paid with federal funds, twice per year (i.e. at the end of each semester) or annually and after-the-fact.

Forms are signed monthly by the staff member and his/her immediate supervisor. The split time log is filled out after the end of each month and submitted to the immediate supervisor for review and signature. Supporting documentation (source documentation) is kept by the person owning the time log. This source documentation includes calendar entries, etc. Signed forms are maintained in the Federal Programs office.

**SPECIFIC DOCUMENTATION EXPECTED FOR T&E:**

<table>
<thead>
<tr>
<th>WHO</th>
<th>SAMPLE TYPES OF DOCUMENTATION</th>
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<tr>
<td>STIPEND RECIPIENTS</td>
<td>Periodic Certification</td>
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<tr>
<td>TITLE PAID STAFF (FULL)</td>
<td>Annual or Semi-Annual Certification</td>
</tr>
<tr>
<td>TITLE PAID STAFF (PART)</td>
<td>Annual or Semi-Annual Certification</td>
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<tr>
<td>SUBSTITUTES</td>
<td>Evidence/record from Time Clock (i.e.</td>
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| MENTORS                          | Annual or Periodic Certification | Registration, | Sign-in Sheets |
| PRINCIPALS                       | Evidence of Allowability | Requisitions, Procedures | Evidence of History |
| (OTHER)                          | (Documentation will reflect examples above as well as, other requested |

**Consultants, Contracts, Purchased Services for Federal Funds 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 non-procurement transaction that are expected to equal or exceed $25,000. Lowndes County School System will utilize sam.gov to search vendors to check for suspended or debarred parties. LCSS 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 a monthly basis. If the totals over the course of the year exceed $25,000, EPLS 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.

**System for Awards Management (SAM)**

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

- Contracts are generated.
- Specific duties are specifically spelled out for each contract.
- The person must also submit to be fingerprinted if he/she is working with students.
- The contract includes the number of hours to work and the rate of pay.
Each contract is signed by the following:

- Contractor
- Assistant Superintendent of Curriculum and Instruction
- Federal Programs Director

**Verification of Work**

The appropriate Director provides oversight in ensuring that all contractors’ work is complete. Artifacts, daily sign in sheets, and completion of all workshops are kept on file in the Federal Programs office.

The Federal Programs Director signs off on all invoices/contracts prior to the issuance of payment for services. These contracts must be maintained and kept on file in the Federal Programs office.

**Periodic Certification**

Periodic certifications for all 100% federally-funded paid staff takes place after-the-fact. The process may occur annually or semi-annually. The first one for the year takes place at the beginning of January and the second/annual periodic certification takes place at the end of the school year (May/June). Schedules (like a school’s master schedule or a teacher’s schedule) are provided to verify work the assignment and will accompany the Periodic Certification for compliance documentation.

**Section 16: Supplement Not Supplant Procedures**

Federal Programs expenditures are supplemental to schools’ budgets. Federally-funded paid 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 program funds are not used to take the place of (supplant) local, state, or other federal funding. Conversations regarding supplement versus supplant are held quite often throughout the year. Title programs/activities provide supplemental services to programs that are required by federal, state, and local law. Title program funds do not support programs that were paid with state or local funds unless there has been evidence of precipitous decline. All principals are made aware of the supplement not supplant issue during the training that takes place during the summer before school starts. The Federal Programs Director reviews budget requests to ensure that supplanting is not taking place. Expenditure of funds must be allowable and reasonable in accordance with OMB Circular and EDGAR 74.36. (SEE SECTION #13- EQUITABLE ALLOTMENTS for SCHOOLS)

Federal programs (excluding Title I, Part A) use the follow questions to ensure that programs are supplementing, not supplanting: Respond “NO” to the following questions:

1. Would other monies from the state, local, or other federal resources have been used to pay for the item or service?
2. Was the item or services provided with non-federal funds in the previous year?

3. Was the item or services provided to participating schools with Title funds and to non-participating schools with non-federal funds?

Beginning in FY 19, the District will adhere to the formulas outlined in the annual Resource Allocation Method/Plan (RAM/P) to help avoid supplanting issues. (The RAM/P is developed annually in a collaborative effort between the Federal Projects Director and the Finance Office.

**Section 17: Comparability of Services**

**Procedure for Determining Title I Schools’ Comparability**

Comparability is achieved through the use of two forms of documentation: the October FTE count for the current year and the payroll distribution report. The state comparability report provided by the Georgia Department of Education is used to report the appropriate numbers to GaDOE. The total number of non-federal employees that are to be included per payroll distribution codes are counted and placed in the comparability report, which automatically calculates comparability. The enrollment numbers submitted for comparability are from the October FTÉ count with the exclusion of prekindergarten enrollment. High Poverty Attendance Area Schools are compared to Low Poverty Attendance Area Schools. Using the student/instructional staff ratios to compare the average number of students per instructional staff in each Title I school with the average number of students per instructional staff in non-Title I schools, comparability is achieved when High Poverty Attendance Area Schools averages do not exceed 110 percent of the Low Poverty Attendance Area Schools. Included in the count are instructional teachers and support personnel, instructional paraprofessionals, music, art, and physical education teachers, guidance counselors, speech therapists, media specialists, school social workers and psychologists. No federally-funded personnel or prekindergarten personnel are included in the count; only state and local paid staffs are counted. Comparability will be determined and established by December 1 of each year.

The Georgia Department of Education calculates Title I, Part A comparability.

To document comparability, LEAs should use the Title I Comparability Report spreadsheet located under **Other Resources** on the Title I webpage. Documentation is kept on file in the Finance office and reflected in the online portal.

**Comparability Report Procedures**

1. Request CPI Report 12 and 13 (certified staff and non-certified staff) from the finance department after the report has been submitted to GaDOE (usually in October). This is source documentation and must be used for this report. This report is found on the Consolidated Application. Export the names of all staff and set-up spreadsheet to count all staff members at each individual school.
2. Pull October FTE count from GaDOE website.
3. Once the report is received, strike out or highlight everyone that is not 00.
4. Count all staff not highlighted (51 – Title I Regular, 52 Title I ARRA, etc.)
5. Count these numbers up. Make sure to have an additional person double check these numbers.
6. Be careful to examine the staff that are split-funded.
7. Go to GaDOE and pull up the latest forms for comparing Title I and Non-Title I schools.
8. Pull the Oct FTE report to fill out the signature page for the report.
9. Do not count Pre-K.
11. The GaDOE staff calculates Comparability and uploads the results in the Consolidated Application.
Compliance Timeline

<table>
<thead>
<tr>
<th>The district should collect the necessary data to demonstrate comparability as of the October full-time equivalent (FTE) count day. Request this information from FTE Coordinator around the 1st week in November. It is the October count.</th>
<th>1 Week in November</th>
</tr>
</thead>
<tbody>
<tr>
<td>If all schools in the district are not comparable as of the October FTE, revise report</td>
<td>No later than Dec 31 of the current year</td>
</tr>
</tbody>
</table>

Who to Include in Staff Count:

- Teachers
- Other personnel that provide direct instructional services including music, art, and physical education teachers, guidance counselors, speech therapists, media specialists, staff that provide support instruction such as school social workers and psychologists.

Who Not to Include:

- Custodians, cafeteria personnel, school nurses, security personnel, prekindergarten teachers, prekindergarten paraprofessionals, secretaries, and non-instructional paraprofessionals.

Section 18: Equipment and Real Property

Inventory is maintained and entrusted at the school level by the designated selected by the Principal, generally the Academic Coach and/or Parent Liaison and is expected to be maintained and secured by proper and reasonable means to avoid theft, damage, or loss. Inventory is documented in a database that is updated each time equipment is purchased. All federally-funded property is identified by permanent markings on the equipment that signify the program and the fiscal year the equipment was purchased. The database includes a description of the item, serial number, and vendor name, FAIN, date of purchase, funding, cost, school, equipment location, and current condition. School personnel must annually verify the location and condition of the equipment. Each item must be checked/noted on the inventory record specifically for condition and location.

Principals attest that the equipment is as identified on the inventory record submitted to the Federal Programs Director.

Technology personnel help determine the condition of equipment. When a piece of equipment needs to be disposed of, disposal forms are completed and kept on file. Disposal occurs according to the Lowndes County School System Disposal Policy.

USE OF EQUIPMENT

Principals’ sign and date their inventory of federally-funded equipment annually.

The Federal Programs Director/designee signs and dates inventory of federally-funded equipment housed at the Central Office. The inventory is compiled and provided to the Principals by the office of the FPD.

Georgia Professional Standards Commission Code of Ethics:

Standard 5: Public Funds and Property - An educator entrusted with public funds and property should honor that trust with a high level of honesty, accuracy, and responsibility. Unethical conduct includes but
is not limited to:
1. misusing public or school-related funds;
2. failing to account for funds collected from students or parents;
3. submitting fraudulent requests for reimbursement of expenses or for pay;
4. co-mingling public or school-related funds with personal funds or checking accounts; and
5. using school property without the approval of the local board of education/governing board.

**Method for Documenting Use in Building & Inventory Procedures**

All schools are required to label all federally-funded equipment. All equipment purchased with Federal funds is inventoried annually. A report is filed in the Federal Programs office. Inventory includes Description, Serial Number/Identification Number, FAIN Number, Funding Source and Percentage of Source, Title, Vendor, Acquisition Date and Unit Cost, Location, Use (Student Instruction, Professional Development, Family & Community Engagement, etc., Condition, Disposition (including sale price, if applicable and includes the correct Federal Award Information Number (FAIN connected to the year of purchase.

**Schools Use of Title I Equipment - Procedures**

*The Lowndes County School System currently does not have any Targeted Assistance schools. In the future, if need arises, the following procedures will be followed:*

*Equipment purchased with federal Title I funding for the Lowndes County School System Title I Schools is exclusively utilized by eligible Title I students in Title I Targeted Assisted Schools. The general purpose for this equipment is to promote mastery of core content knowledge in reading/mathematics and to facilitate remediation as well as acceleration. Each Title I school has additional equipment not purchased with federal funds available to all students.*

All equipment purchases (i.e. computers, printers by participating TA schools are to be used only by Title I teachers, eligible Title I students and eligible parents. A list of the Title I students and their parents must be available to ensure that the equipment is only used by these students and parents. The district Federal Programs department reserves the right to monitor equipment purchased with Title I funds even after the school becomes a non-participating Title I school.

**Use of Title I Equipment in Targeted Assistance Schools**

Any equipment purchased with Title I, Part A funds must be reasonable and necessary to implement a properly designed program for Part A participants. This should be reflected in the School Improvement Plans of each Title I school served during that particular fiscal year. However, under some circumstances, equipment purchased as part of a properly designed Part A program may, without constituting an improper expenditure, be used on a less-than- full-time basis. That equipment could be made available for other educational uses without interfering with its use in the Part A program. Equipment could be used on other projects or programs currently or previously supported by the Federal Government, “providing such use will not interfere with the work on the projects or programs for which it was originally acquired.”

LEAs should be judicious in applying these standards. Absent actual evidence to the contrary, the standards will have been presumed to be met and the use of Part A equipment in non-Part A activities is proper if use does not exceed 10 percent of the time the equipment is used in Part A activities. However, use above that amount in non-Part A activities is not necessarily improper if the standards are met on a case-by-case basis. The use of Title I equipment in Targeted Assistance Program schools in non-Title I activities on a part-time basis must be done in a manner that protects the integrity of the equipment as a Title I expenditure. Accordingly, the LEA must ensure and document that:

- the Title I equipment is part of a project that has been properly designed to meet the special educational needs of educationally deprived children;
- the equipment purchased with Title I funds is reasonable and necessary to operate the LEA’s Title I project without regard to any use in non-Title I activities;
- the project has been designed to make maximum appropriate use of the equipment for Title
the use of the equipment in non-Title I activities does not decrease the quality or effectiveness of the Title I services provided to Title I children with the equipment, increase the cost of using the equipment for providing those services, or result in exclusion of Title I children who otherwise would have been able to use the equipment.

In the absence of evidence to the contrary, it will be presumed that these standards have been met and that use of Title I activities is proper if that use does not exceed 10 percent of the time the equipment is used in Title I activities, provided the equipment is not needed in the Title I program. Permissive use of the equipment for one period of the day is allowable, if it is not needed by Title I. Before and after school use is acceptable if Title I does not need the equipment. Care should be taken that the equipment is properly supervised, that use will not affect the integrity of the equipment that the Title I program is not compromised, and that users will assume all responsibility for any and all damage to the equipment.

Lowndes County School System Equipment Disposition Procedure

Authority to Dispose of Unserviceable or Surplus Property

The Lowndes County Board of Education shall have the authority to sell/dispose of any unserviceable or surplus property at its discretion or as specified hereafter.

Schedule for Assessment of Surplus, Unserviceable, Unusable and Obsolete Property

No less frequently than once annually a surplus review of unserviceable, unusable and obsolete property will be completed to make determinations regarding disposal.

Methods for Disposal of Surplus Goods and Assets (excluding real estate)

The Lowndes County Board of Education authorizes the Superintendent or his/her designee to establish district procedures to implement this policy. When property owned by the Lowndes County School System is no longer of economically sound use for meeting a system need as determined by the director of the department that purchased the property, the method of disposal will be determined in a manner that maximizes revenue, minimizes expenses associated with the disposals, and complies with all state and federal laws, policies and regulations. No surplus goods or assets may be disposed of without prior approval of the Superintendent of his/her designee. No surplus goods or assets may be disposed of without prior approval of the Superintendent of his/her designee. All surplus goods or assets shall be disposed by the most cost effective of the following four methods:

1. Property may be sold to the highest bidder via a competitive bid process, spot bid sale or auction. This may include electronic or virtual auction methods. Such events shall be advertised in appropriate media, sufficiently in advance of the sale date to provide a competitive environment for maximizing system revenues.
2. Property may be sold in an “over the counter” manner to the public at any time. The prices charged will be based on prices received in the most recent spot bid or auction sale of a like item.
3. Property may be transferred at no charge to another school system or non-profit organization, preferably located within Lowndes County, in response to a written request from the organization. The school system or non-profit organization will affirm in writing its agreement to accept the transferred property and will be responsible for retrieving the property from the Lowndes County School System.
4. Surplus items not claimed or purchased may be disposed of two months after they are declared surplus or immediately after a spot bid sale or auction. If possible, items
shall be recycled in accordance with Environmental Protection Agency (EPA) rules and regulations, traded in or used for parts.

**Disposal of Unrepairable, Unusable and Obsolete Property**

Property may be disposed of if items are unrepairable, unusable or obsolete (<$5000 and/or > 3 years) as determined by the director of the department that purchased the property. The method of disposal will be determined in a manner that maximizes revenue, minimizes expenses associated with the disposals, and complies with all state and federal laws, policies and regulations. No unserviceable, unusable or obsolete goods or assets may be disposed of without prior approval of the Superintendent or his/her designee. If possible, items shall be recycled in accordance with Environmental Protection Agency (EPA) rules and regulations.

Disposal of all equipment purchased through the federal E-Rate program shall be disposed no less than five (5) years after installation in accordance with Universal Service Administrative Company (USAC) rules.

**Staff Conflict of Interest as it relates to "Disposition of Equipment"**

School district employees who declare items as surplus shall not purchase items they have declared as surplus. Likewise, the immediate family members as defined in Policy GARH of school employees who declare items as surplus shall not purchase items declared as surplus by their school district family member.

When federally-funded/Title programs equipment is no longer operable and/or does not meet the needs of the program, the Federal Programs office should be notified. At the time of notification, a staff member from the office will come to the school to pick up the equipment. Said equipment will either be relocated to another Title I facility (if operable) or disposed of in accordance with Lowndes County Board of Education Policy DO. All methods of disposition must be fully documented and the information kept on the inventory list for three years after the final disposition.

In the event of the closure of a Title I school, all inventoried equipment will be distributed to other Title I schools based on need. The inventory spreadsheets will be adjusted to track the movement of all equipment. Documentation will be maintained in the Title I office.

It is the policy of the Board that two employees who are related to each other as defined by this policy shall not be assigned within the school system so as to result in one of the related employees being in a direct supervisory position (responsible for the evaluation) over the other. It is the preference of the Board that no two persons who are related to each other as defined in this policy will be assigned to the same work site. However, the Board recognizes that in areas of critical need, the superintendent may determine that assignment to the same work site is appropriate.

For the purpose of this policy, relatives are defined as persons related by either blood or marriage in the following way: spouse, parents, children, brothers, sisters, grandparents, grandchildren, and any relatives living in the immediate household of the employee.


Section 19: Cash Management (Drawdown) Procedures

- The Chief Financial Officer administers the drawdowns.
- All grants are divided by 12 months.
- **Drawdowns** for federal funding payments are done monthly/bi-monthly. This is an acceptable practice to our financial auditors.
- The Finance Office is very careful to draw down these funds based on actual expenditure needs. The system bookkeeper reconciles the bank statements.
- The Chief Financial Officer performs periodic review of the general ledger.
- There is no cash involved as all drawdowns are directly deposited into our bank account. All reporting documentation is kept in the Finance Office. It can be reviewed at any time.

Section 20: Reporting Procedures

A copy of the completion report for the previous fiscal year will be kept on file in the Federal Programs office and in the Finance Department.

Accounting records to support the results of outlays (expenditures indicated in the completion report will be kept on file in the Federal Programs office and Finance Department.

Copies of expenditure (cumulative) reports for the respective quarter for total expenditures reported to GaDOE will be kept on file in the Federal Programs office and Finance Department.

The Federal Programs Director will check budget summary and detailed expenditure reports for all federal funds.

Section 21: Services for Homeless Children and Youth

The Lowndes County School System homeless liaison meets, at a minimum, quarterly with school personnel to discuss the requirements of the McKinney-Vento Homeless Education Act. Among the topics discussed are the transportation requirement for schools of origin and the definition of and services for students identified as homeless. The homeless liaison supervises and works very closely with the school guidance counselors/homeless contacts and transportation director/designee to assure students receive the services they need. He/She provides new or additional posters and assures these are placed where parents can readily see them. Annually, Lowndes County School System’s policy and procedures for homeless students are reviewed.

Program Procedures

- The district is responsible for identifying a homeless liaison and ensuring that the position is listed on the district’s organizational chart.

- Homeless students will be identified based on the definition prescribed by the McKinney-Vento Homeless Assistance Act and via a red flag in the district’s student information system. All staff in the district to include bus drivers, principals, central staff, etc. will be trained in the identification and recruitment of homeless students.
● The homeless liaison will ensure training for all school system employees is provided annually.

● All schools will display flyers, brochures, and posters that identify the homeless liaison contact information.

● Services for homeless students (tutoring, etc.) will be evaluated based on needs assessment and student academic achievement.

**Section 22: Services for Neglected and Delinquent Children**

There are two neglected facilities in Lowndes County. These include Raintree Village Children’s Home (RTVCH) and Georgia Sheriff's' Boys Ranch (GaSBR). The Lowndes County School System serves these students with Title I funds. These funds may provide tutoring services, supplies, computers, and other needs as they arise. The Federal Programs Director will consult/work directly with each facility to ensure that students are receiving the services needed. Unless otherwise specified and/or due to unusual/extenuating circumstances, all students at the N&D facilities will be considered for services with priority to the most academically deficient being priority.

Meeting minutes, agendas, collaborative planning, emails, and phone logs will be maintained by the site director and Federal Programs Director.

Equipment is inventoried annually.

The director of each facility will annually submit the source data for the “Annual Survey of Institutions for Neglected and Delinquent Children.” The facility staff will select a thirty (30) day window in which one day falls in the month of October for the completion of all surveys.

Monitoring of N&D Services will be conducted annually through a variety of means and practices:

- Services will be monitored daily by the Site Director/Designee of each facility. The Site Director/Designee will be responsible for reviewing/signing the time sheets of the tutor(s) at the end of each day/week to attest compliance and satisfaction of the services provided. The Time Sheets will be forwarded to the FPD for compliance, evaluation, and signing for payment of services. (Time sheets are due monthly along with the accompanying time sheet data).
- The Federal Programs Director will make a site visit at least once per 9-weeks to verify services are being provided in accordance to the expectations of the services and to evaluate the needs of the students housed at the facility. Other contacts (i.e. phone correspondence, emails) to the Site Director/Designee are made once per 9-weeks, as well, to help monitor the effectiveness and satisfaction of the program. Observational notes will be maintained from these visits by the FPD. Sign in sheets and notes will be maintained.
- All documentation from on-site visits, technical assistance meetings, and contractual agreements will be share electronically with the Provider and Site Director by the FPD.
- Students being served at the N&D facilities will receive additional academic support/tutoring based on academic areas of need. This may be based on, but not limited to, available data from the students’ report card, progress report, standardized test data, classroom reports, or some other pre-assessment data.
- **Inventory purchased for N&D facilities will be documented with the same procedures as for schools and the Site Director will participate at the facility in the role as the Principal would related to a school. The same inventory sheets will be used with N&D facilities that are used with schools.**
• An annual outline of expectations will be provided at each N&D facility. This will be ongoing and flexible as needs change at each site and will be incorporated into the annual on-site meetings with the Site Director and FPD from the District.

• If the services provided to N&D facilities are contracted with an outside source, at least two quotes will be solicited by the LEA. All quotes will be considered and awarding of the contract will be determined by the FPD, the Assistant Superintendent of Finance, and the Superintendent. Should the recommendation exceed allowable amounts according to LEA and Federal guidelines/policies, Board approval will be obtained.

• Technical assistance is provided by the FPD for the Site Director at the facility. Periodic contacts are made to evaluate/assess the satisfaction with the services being provided and the satisfaction with the technical assistance.

• LCS will provide each N&D facility with electronic devices for student use throughout the school year, as well as, during the summer vacation months. These devices may be used in conjunction with summer school instruction (if applicable) or for individual remediation/acceleration. The Site Director/designee will be responsible for supervision during summer months. Students housed at the N&D facilities receive prioritized consideration for summer school services based on their individual needs/performances. Other summer supports are considered based on the needs expressed by the facilities.

• LCSS will work in conjunction with the N&D Site Director and Provider to ensure that the services provided are relevant, appropriate, and meet the needs of the students. Corrections and adjustments to the delivery of/satisfaction with the quality services provided will be at the heart of the relationship between the System, Facility, and Provider. If concerns arise, a corrective plan will be developed to remedy the concerns. Should the Provider fail to provide acceptable work/services as prescribed by the contract and/or corrective plan, LCSS reserves the right to terminate the contract within acceptable notification as prescribed by law.

**ROLES:**

**SITE DIRECTOR/DESIGNEE-**
- Attest that services are provided in accordance to the agreed upon timelines
- Communicate with the Provider and FPD issues/concerns in the delivery of the services
- Serve as a Liaison to the FPD in communicating concerns
- Sign the time sheets for the Provider(s) to acknowledge the service was adequately rendered

**PROVIDER-**
- Render services as outlined in the contractual agreement
- Provide flexibility to meet the scheduling needs of the students/facility
- Communicate issues to Site Director/Designee and to the FPD
- Sign/submit time sheets bi-monthly
- Provide additional resources for students as needed within the context of the services
- Provide credentialing information as requested by the System

**FEDERAL PROGRAMS DIRECTOR-**
- Administer the N&D program to ensure compliance and that performance of the services being contracted are provided and are satisfactory
- Make site visits once per 9-weeks to monitor progress of the Provider
- Contact Site Director once per 9-weeks to check progress and service status
- Conduct TWO on-site meetings per year (July/August and December) to serve as an update of the services and to plan for future needs
- Evaluate, sign, and process the time sheets/invoice for payments
- Collaborate with the Site Director and Provider to support any additional needs at the facility

**FINANCE DIRECTOR/SUPERINTENDENT**
- Approve the type of services (i.e. hired employee, contracted service, etc.) to be implemented in providing for the requirements for the N&D facilities
Section 23: Prevention and Intervention Programs for Children Who Are Neglected, Delinquent, or At-Risk

The Lowndes County School system serves two facilities at this time. Please refer to the previous Section 22 for more information.

Section 24: Title VI, Part B – Rural and Low Income

Procedures and information regarding Title VI are kept by the Federal Programs Director if applicable.

Section 25: Pre-Kindergarten Programs

The district does not reserve Title I funds for pre-kindergarten programs at this time. Meetings are held with area Head Start and private daycare centers to discuss potential concerns.

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

Section 26: Teacher Qualifications

Evidence-based Professional Learning

Evidence-based professional learning must be of high quality, sustained, intensive, Evidence-based, and classroom-focused in order to have a positive and lasting impact on classroom instruction and the teacher’s performance in the classroom. It must also address one or more of the annual LEA prioritized needs.

Finally, Evidence-based professional learning must focus on increasing the ability of the teaching staff to help all students achieve high academic standards, or on increasing the ability of the school administrative staff to lead their schools’ efforts to increase student academic achievement.

Procedures for Ensuring Qualified Employees

Principals receive training annually on the professional qualifications for hiring and placement of teachers and paraprofessionals.

The Federal Programs office, along with Human Resources, will maintain a list that includes the status of all Title I and Title II paid staff. In the Lowndes County School System, all staff paid with Title I and Title II funds must meet the professional qualifications outlined by our District.

Professional Qualifications

The Human Resources Department monitors the qualification status of teachers and paraprofessionals and of teachers who hold a non-renewable certificate on an ongoing basis. The Human Resource Specialists are in regular communication with these teachers/paraprofessionals and school administrators to assure all remediation plan requirements are being met. The HR office maintains a list of those teachers/paraprofessionals and closely monitors, along with the principals,
their efforts to receive renewable certification. Regular progress monitoring of these teachers is done through follow-up conferences, letters, and email.

**Procedures for Parent Notification of Non-Qualified Teacher**

Principals are trained annually and will adhere to parent notification requirements for non-qualified staff. Copies of the evidence provided to parents will be kept on file (See Section #3 for Parent Notifications of Title I Schools - similar steps are taken at all LCS). Beginning in FY 19, Title I, Part A assumes the responsibility of the parent communication for participating English learners (ELs).

Should a student be assigned to a non-qualified teacher for more than 20-instructional days, the School/ System must notify the parents of the teacher’s qualifications. This notification is done through what is known as the **20-day letter**. Principals are responsible for providing this information to the parents of students who are scheduled in the class of any teacher that does not meet the proper qualifying requirements to teach a specific content. A copy of this letter, the method of notification, and the list of students/parents who receive the notification are kept on file by the Principal. Parental concerns are directed back to the building-level Administration.

**Procedures for Attestation/Periodic Certification**

- The FPD/HR Director will prepare the forms for principals to sign annual/periodic certification forms for all Title I and Title II, Part A paid staff. Attestation forms will be signed no later than October 1.
- Periodic Certification forms will be signed in January and May/June*.
  *(A "one time", Annual Certification is now allowable. This will be submitted after the contract time ends (usually in June of each year).
- Split-funded personnel should not sign periodic certification forms.
- This information will be maintained in the Federal Programs office.
- A copy will be given to the Human Resources Department.
- 20-day Notification should occur with school 5-days of the 20th day of instruction.
Procedures for Hiring Instructional Paraprofessionals

Paraprofessional vacancies are posted on the website for the Lowndes County School System. A job description is included. Paraprofessional education requirements are listed below.

- Hold a paraprofessional certification
- or, a minimum of an Associate’s Degree or higher in any subject
- or, successful completion of a minimum of 60 semester hours or 90 quarter hours of college coursework
- or, a minimum of a high school diploma or GED, AND a passing score on the GACE (Georgia Assessments for the Certification of Educators) Paraprofessional Assessment?
- or, a minimum of a high school diploma or GED, and an understanding that the GACE paraprofessional assessment must be taken and passed to be eligible for a Georgia Paraprofessional Certificate.

This ensures that the applicants have met the minimum qualifications to be professionally-qualified as outlined District expectations. Qualifying applicants are then eligible to interview with principals. Principals make recommendations to the Human Resources Department, and recommended candidates are fingerprinted and complete other employment paperwork.

Instructional Paraprofessionals

1. Principals will annually train Title I instructional paraprofessionals on best practices.
2. A schedule documenting the paraprofessional is under the direct supervision of a certified teacher must be submitted to the Federal Programs office by the second week of school.

Section 27: Title III, Part A

Purpose

The English Language program is designed to provide consistent and non-discriminatory procedures throughout each school within Lowndes County as recommended by the U.S. Office for Civil Rights, Department of Education. The Civil Rights Acts of 1964 requires local school districts to provide an alternative program of service when there are students who are limited English proficient and are unable to participate effectively in the district’s regular instructional program.

(SEE THE LCSS TITLE III/ESOL RESOURCE GUIDE IN THE APPENDIX)

All procedures and documentation for Title III, Part A are kept by the Federal Programs Director.

Section 28: Private Schools

Invitations for private schools located within the district’s boundaries are invited to consult in participation in federal programs the following calendar year are sent August/September, via receipt delivery. A meeting is
held in September/October to present information about the programs available to students in private schools. In FY 19, GaDOE will be conducting a series of regional meetings for all Private Schools and LEAs to attend. At the local meeting, all Federal Programs Directors/directors are invited to the meeting, which is complete with an agenda and sign in sheet. Upon receipt of the intent to participate form, which is provided to private school officials, a meeting is held to discuss plans and the required components of federally-funded services for private school students. If participating, meetings between the LEA and private school are scheduled every two months to discuss the progress and process of federal programs.

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

When a private school determines that the school would like to participate in Title I or Title II, the district will determine the per pupil allocation for qualified students.

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

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

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

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

No. The law requires an LEA to provide equitable services to teachers and students in “private elementary and secondary schools.” The law defines “elementary schools” and “secondary schools” to mean “nonprofit institutional day or residential school[s]” that provide elementary and secondary education, respectively.

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

**Identification of Participants**
The LEA works closely with the private school to verify attendance area of possible students. It is the responsibility of the private school to provide potential students’ names, addresses, and verification of free and reduced participation for qualification of the students.
Finance
It is the responsibility of the LEA to process third vendor work as well as materials via a requisition.

No requests for reimbursement will be allowed as all purchases must be approved prior to the purchase.

All materials, equipment, and supplies purchased by the LEA are the property of the LEA. At the time the private school no longer participates, the property will be returned to the LEA.

An inventory will be maintained at the LEA. The private school will complete an inventory and maintenance check twice per year at the request of the LEA.

Complaints
Complaints by the private school are filed in compliance with the LEA complaint process (see Complaint Procedure.)

All complaints will be addressed within 10 calendar days of filing and will be resolved within 60 days according to the process.

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

Equipment
The private schools will follow the same procedure as Lowndes County School System schools.

Timeline for Private Schools

<table>
<thead>
<tr>
<th>Month</th>
<th>Activity</th>
</tr>
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<tbody>
<tr>
<td>August /September</td>
<td>● Send letter to request participation to private schools who work with students from the Lowndes County School System for the following school year.</td>
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<tr>
<td></td>
<td>Hold Private School Meeting consultation. Gather data and consult with private schools to determine services and possible participants.</td>
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<tr>
<td></td>
<td>Begin to gather data for Eligible Participation Worksheet.</td>
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<td></td>
<td>● Remind private schools that any materials or purchases must be requisitioned and remains</td>
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<tr>
<td></td>
<td>● Verify addresses of students attending the participating private school</td>
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<td>●</td>
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<tr>
<td></td>
<td>● Begin services.</td>
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<td></td>
<td>● Note: If there is a third party vendor, see policy for third party vendor from GaDOE. Sign a letter that states the requirements on both parties to enter into agreement.</td>
</tr>
</tbody>
</table>
AFFIRMATION OF CONSULTATION WITH PRIVATE SCHOOL OFFICIALS

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

The following topics must be discussed during the ongoing consultation process:

- How the LEA will identify the needs of eligible private school children.
- What services the LEA will offer to eligible private school children.
- How and when the LEA will make decisions about the delivery of services.
- How, where, and by whom the LEA will provide services to eligible private school children, including a thorough consideration and analysis of the views of the private school officials on the provision of services through a contract with a third-party provider.
- How the LEA will assess academically the services to eligible private school children in accordance with §200.10 and how the LEA will use the results of that assessment to improve Title I services.
- The size and scope of the equitable services that the LEA will provide to eligible private school children and, consistent with §200.64, the proportion of funds that will be allocated to provide these services.
- The method or sources of data that the LEA will use under §200.78 to determine the number of private school children from low-income families residing in participating public school attendance areas, including whether the LEA will extrapolate data, if a survey is used.
- The equitable services the LEA will provide to teachers and families of participating private school children.
- If the LEA disagrees with the views of the private school officials on the provisions of services through a contract, the LEA must provide the private schools the reasons in writing why the LEA chooses not to use a contractor.

Section 29: Academic Achievement Awards Program

Reward Schools

Procedures for Establishing Per School Awards for Reward Schools Section 1117 Elementary and Secondary Education Act of 1965

1. Schools are selected based on the schools’ reward status as defined by the US Department of Education. Two categories of Reward Schools are eligible to be included receive awards: (1) Highest-Performing Reward School – a Title I school among the Title I schools in the State that have the highest absolute performance over a number of years for the
All Students group and for all subgroups based on statewide assessments, and, at the high school level, is also among the Title I schools with the highest graduation rates. A school may not be classified as a Highest-Performing School if there are significant achievement gaps across subgroups that are not closing in the school.

(2) **High-Progress Reward School** – a Title I school among the 10 percent of Title I schools in the State that are making the most progress in improving the performance of the ALL Students group over a number of years on the statewide assessments, and at the high school level, is also among the Title I schools in the State that are making the most progress in increasing graduation rates. A school may not be classified as a High-Progress school if there are significant achievement gaps across subgroups that are not closing in the school.

2. Using the free/reduced meal (FRM) data for the fiscal year previous to the award, all schools in the state are listed in descending order according to FRM count. The schools are then divided into four equal parts resulting in four quartiles. The cutoff point between higher poverty schools and lower poverty schools is then determined by starting with the highest FRM-percentage school and moving down the ranked list to the last school in the top quartile. This quartile is the list of higher poverty schools. The second, third, and fourth quartiles are the lower poverty schools. Schools identified as a Highest-Performing Reward School or as a High-Progress Reward School in the higher poverty schools quartile draw from the 75-percent fund. Schools identified as a Highest-Performing Reward School or as a High-Progress Reward School in the lower poverty schools quartiles draw from the 25-percent fund.

3. What is meant by the 75-percent fund? At least 75 percent of the funds available for awards must go to the schools in the highest quartile based on the number of FRMs. Available funds are divided into two funds: one containing 75 percent of the funds; the other, 25 percent of the funds.

- **Funds available for the 75 percent fund** equal Total Funds Available \( \times 0.75 = \) Amount of Award
- **Funds available for the 25 percent fund** equal Total Funds Available \( \times 0.25 = \) Amount of Award

**Highest Poverty Schools – 75 Percent Funds:**

Highest Poverty Schools are defined as schools whose poverty places the school in the top quartiles of the Rewards Schools list for the current fiscal year. GaDOE will divide the funds available for the 75 percent fund award by the number of schools in the highest poverty schools quartile to determine the award for each school.

**Lower Poverty Schools – 25 Percent Funds:**

Lower Poverty Schools are defined as schools whose poverty places the school in the top quartiles of the Rewards Schools list for the current fiscal year. GaDOE will divide the funds available for the 25 percent fund
award by the number of schools in the lower poverty schools quartiles to determine the award for each school.

The total amount awarded for both highest and lower poverty schools will be equal to or less that the total amount of funds available for award in the current fiscal year. Any remaining funds will be carried over to the next fiscal year.

**Rewards School Plan for the Lowndes County School System**

**For Use of Title I, Part A Reward Schools and Reward Districts Budgets**

Instructions: Please complete the following questions and attach the narrative to the consolidated application when submitting your budgets. Please ensure that you provided a detailed narrative in the descriptions portion of the budget details page within the consolidated application.

Please provide a narrative response to the items below:

- Summarize the activities and materials to be funded using the Title I, Part A Reward Schools Award of the Title I, Part A Reward District Award for each school in the LEA or LEA receiving an award. This summary must delineate the decision-making process utilized at each Reward School in the LEA or Reward District for determining the expenditure of the Title I, Part A Reward Schools and Reward Districts Award funds. Please include a listing of the staff with job titles involved in the decision-making process.

- What processes and procedures does the school / LEA have in place to monitor the use of Title I, Part A Reward Schools / Districts Awards monies?

- What internal controls does the school / LEA have in place to promote efficiency of implementing the plans for this award, assure appropriate use and expenditure of Academic Achievement funds, and safeguard assets and / or fraud and error?

*Please Note:* If this is a Reward School Award provide the principal’s signature and date of signature.

**Reward Schools Budget**

Approval of budgets will occur once a thorough review of all expenditure requests and supporting documentation has been completed by the GaDOE Title I Education Program Specialist for Reward Schools.

**Reward Schools Quick Reference Guide for Use of Funds**

- Schools receiving monetary awards must use funds for educational purposes only:
  - Resources / instructional materials
- Monetary awards for current year employees
- Schoolwide projects; such as computer labs, materials and supplies for the media center, science labs

Schools choosing to make monetary awards to staff must include all staff in the categories of staff receiving the monetary rewards. If making awards to more than one personnel classification, schools may award different amounts for different personnel classifications. For example, teachers in the school would be awarded the same amount; non-instructional personnel would receive the same amount, and so forth.

Schoolwide programs’ staff would all be potentially eligible to receive monetary rewards. Targeted Assistance programs staff would need to be Title I staff in order to be eligible to receive a monetary reward. In both cases, staff receiving monetary rewards would need to be current staff at the Title I school.

- When the award is received, the current principal will make the final decision as to how the funds are spent. Only current Title I employees of the awarded school are eligible for any awards.
- All monetary awards to individuals are considered to be personal income and are subject to appropriate state and federal tax guidelines.
- Schools may not use funds for capital outlay projects. This would include construction, carpet, renovations of school facilities, classrooms, auditorium, multipurpose rooms, etc.
- Expenditure of funds must be allowable and reasonable in accordance with OMB Circular A-87 and EDGAR 2 CFR 200.

**Section 30: Migrant Education Program (MEP) Services**

Identification of migrant students is completed through the **occupational survey**, which is a portion of the student enrollment packet. These surveys are faxed to and processed by the regional migrant educational provider office. If migrant students are identified, a needs assessment and delivery plan will be developed.

The Federal Programs Director is the designated person responsible for maintaining, updating, and properly coding all required enrollment, educational, and health data in the Lowndes County School System’s Student Information System on migrant eligible students and would share this information on an intra-district and interstate basis.
The Federal Programs Director/designee follows these procedures:

- Records maintenance and transfer
- Identification and recruitment
- Educational support/priority of service
- Consultation with private schools
- Conducts a needs assessment
- Coordination of Migrant services
- Establishes a parental advisory council (PAC)
- Participates in Evidence-based professional learning
- Provides services for the educational needs of migrant preschool children
- Evaluates the program
- Maintains an allowable budget

Potential migrant students are identified through the occupational survey, which is included in all Lowndes County School System registration packets. Once completed, all surveys are removed from the packet at the office’s registration department and are picked up weekly by the Migrant Student Service Provider (SSP). If the parent has answered “yes” to the migrant questions, the SSP interviews the family (recruitment) and sends the information to the GaDOE Regional Migrant Education Program Office who makes a final determination of the migrant status and the student is assigned a priority of services code. If the family has children who are too young for school or out-of-school youth/drop-out, they are included in the services. The SSP also recruits migrant families in the community via various types of referrals.

LCSS provides funding through Title I, Part C to address the needs of OSY/DO and are served by the SSP(s) while they reside in the LCSS district. An annual plan is submitted and approved by the State as to how these students will be supported while residing in Lowndes County. The SSPs exhaust all efforts to accurately identify and support the needs of OSY/DO through consistent communication with the families and commonly used employers in the district. Included in the documentation kept by the SSPs in relation to OSY/DO students are:

- Documentation why a OSY/DO student is not being served (if available). The SSP assigned to OSY will maintain documentation in the monthly records and electronically in a database. Once a student is identified, the SSP completes a Student Profile and the GOSOSY Student Services Plan.

- When a need is identified, a timeline/schedule is designed and maintained to reflect service/support. Services for OSY will begin when a student is identified eligible for the OSY/DO services. Services typically run from September through May. A summer IP is designed to provide support during the month of June, as well.

- Staffing considerations may be considered if the SSP(s) recognize additional support is needed (i.e. contracted services). Additional support will be provided, preferably, by a current teacher of the LCSS for students enrolled in formal classes at the schools. With two SSPs employed, services for
OSY/DO are covered by the SSPs under normal circumstances.

- The SSP utilizes the Supplemental Services Tracking Form to document services and reasons why a student is not being served.

- The SSP will utilize the appropriate profiles for OSY/DO. Once a student is identified, the SSP meets with the student and completes profile and determines the most effective course of action for each individual student.

- The SSP will incorporate the “No Services” documentation template from the GaDOE website when appropriate

- LCSS employs TWO (2) SSPs. They assess student needs and divide the duties and responsibilities of providing support for MEP students. Currently, both SSPs provide collaborative student supports during the regular school year. Also during the school year and In the summer term, one SSP works with the pre-school readiness aged students and the other SSP concentrates on the OSY/DO students.

In LCSS, the SSPs are responsible for all items listed above and maintain the documentation.

A comprehensive needs assessment (CNA) is held annually based on parent, student, and teacher surveys along with student achievement data, and priorities are determined based on feedback and data obtained. Members of the CNA team/PAC meet in April/May and review the State Delivery Service Plan, comparing it to the LCSS migrant program, student achievement data, Evidence-based professional learning needs, and services that need to be offered to migrant families. This assessment is made public through the district’s website in the district’s implementation plan and CLIP responses. An implementation plan for the next school year is developed and uploaded to the GaDOE website for approval by the state. The SSP schedules tutoring sessions/inclusion as needed and assesses the priority of services for students.

His/Her schedule is on file in the Title I Director’s office. A program evaluation is submitted annually to the GaDOE Regional Migrant Education Program Office for each IP.

The Office provides ongoing professional development for the SSP and provides documentation of attendance. The SSP may also participate in system, school, and regional professional development as appropriate.

LCSS, also, identifies and supports pre-school aged students who reside in the district. Pre-school readiness is a standard component of these services and helps students and parents prepare for the formal educational setting of the regular classroom.

The SSP ensures maintenance of records of the migrant students and helps expedite the transfer of records as needed. The SSP works with families to coordinate migrant services with other community services (such as health or mental health). The SSP collaborates with the district Family & Community Engagement Coordinator to organize Family & Community Engagement activities at the school and district level. Parent Advisory Council meetings are scheduled bi-annually at a minimum.

Annual consultation for private schools is requested in the fall (October/November) as mandated by law and provided by the Federal Programs Director.

Title I-C funds are used to pay the salary and expenses of the SSP. Money is also used for supplemental materials for students as funding allows. Migrant students are included in all other services provided by the LCSS school for which they qualify, including but not limited to after-school tutoring, summer school/
intersessions, EIP, ELL, special education, and gifted programs.

**Section 31: Charter Schools**

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

**Section 32: Special State Charter and/or Commissioned Schools**

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

**Section 33: Complaint Procedures**

Complaint procedures are disseminated through the Federal Programs website and in student/parent/staff handbooks distributed at the beginning of the school year.

Parents are expected to address complaints or grievances beginning at the school level with the teacher first and then the administration. Central office personnel should be contacted next should parents feel the issues have not been resolved. If still unsatisfied, the superintendent should be contacted. Conferences forms/notes/minutes are kept on file as documentation of the issues. Complaint procedures are described and a form for documenting complaints is located at the Administrative Services Center or on the Lowndes County website. Complaints relating to curriculum/educational materials are referenced in the Board’s policies, but the same procedure applies. If parents/students have concerns relating to the privacy of student data, the same procedures will apply to these complaints, as well.

The complaint procedures describe grounds for complaints, federal programs for which complaints can be filed, filing and investigation of a complaint, as well as rights to appeal. The Georgia Department of Education address to which complaints should be filed is included in the procedure.

*(SEE THE COMPLAINT PROCEDURES IN THE APPENDIX OF THIS HANDBOOK)*

**LOWNDES COUNTY SCHOOLS EMPLOYEE COMPLAINTS**

*(SEE THE COMPLAINT PROCEDURES IN THE APPENDIX OF THIS HANDBOOK)*
The Chief Human Resources Officer reviews the ethics, waste, fraud, abuse, and corruption policies with all new employees at New Staff Induction in July during an orientation process. The same information is provided to administrators during the first part of the new school year and shall be shared with their staff at the beginning of each school year. Compliance Director is an electronic resource that LCSS currently uses to disseminate this information to all employees. LCS employees are required to acknowledge that they have been informed and are aware of the definitions of each, the guidelines for reporting, and the consequences associated with fraud, waste, abuse, corruption, and conflict of interest. This should be completed at the appropriate levels and submitted prior to October 1st. The documentation is kept by the Human Resources Department and/or Federal Programs Director to document this has been completed. All employees are informed during training that they are required to report fraud, waste, and abuse. A signature by the Principal/Director reviewing the policies verifies the completion of this procedure. Principals are expected to inform their faculties about policies and updates as they are approved throughout the year. The Lowndes County School System fraud regulation describes the definition, staff responsibilities, and internal controls/investigations. The Policies and Procedures Handbook is updated annually and will be posted online for public access.

Fraud Prevention

The Lowndes County School System (LCSS) Fraud PROCEDURE is established to facilitate the development of controls that will aid in the detection and prevention of fraud, waste, abuse, or corruption against the LCSS. It is the intent of the Board of Education to promote consistent and ethical organizational behavior by providing guidelines and assigning appropriate responsibilities related to the detection and prevention of fraud.

SCOPE

This procedure applies to any fraudulent activity, or suspected fraudulent activity, involving employees as well as stakeholders, consultants, vendors, contractors, outside agencies and their employees conducting business with or on behalf of the LCSS, and/or any parties with a business relationship with LCSS.

**Fraud** is defined as the intentional deception perpetrated by an individual or individuals, or an organization, either internal or external to federal, state, or local governments, which could result in a tangible or intangible benefit to themselves, others, or the district or could cause detriment to others or the federal, state, or local governments. Fraud includes an intentional false representation of a matter of fact, whether by words or by conduct, by false or misleading statements, or by concealment of that which should have been disclosed, which deceives and/or is intended to deceive.

**Waste** is defined as the intentional, thoughtless or careless expenditure, consumption, mismanagement, use, or squandering of federal, state, or local resources to the detriment or potential detriment of the district. Waste also includes incurring unnecessary costs as a result of inefficient or ineffective practices, systems, or controls.
**Abuse** is defined as excessive or improper use of a thing, or to employ something in a manner contrary to the natural or legal rules of its use, including intentional destruction, diversion, manipulation, misapplication, maltreatment or misuse of resources, extravagant or excessive use as to abuse one's position or authority. Abuse can occur in financial or non-financial settings.

**Management** is defined as individuals who possess any degree of administrative or supervisory authority. They should be responsible for the detection and prevention of fraud, misappropriations, and other irregularities.

**Examples of Fraud, Waste, Abuse, and Corruption include, but are not limited to:**

- unauthorized use of district-owned vehicles
- unauthorized use of district owned supplies or equipment
- violations of system and/or state **procurement** policy
- falsification of official documents (time sheets, leave reports, travel vouchers, etc.)
- contract fraud
- inappropriate expenditures
- embezzlement

**RESPONSIBILITIES**

Reporting suspected fraud, waste, abuse, or corruption for proper investigation and **disposition** should be the responsibility of all district employees. The Superintendent is responsible for the administration and application of this policy.

**Procedures for Reporting:**

1. Anyone suspecting fraud concerning federal, state, or local programs should report his or her concerns to his or her supervisor. If the suspected fraud implicates the Superintendent, the informant shall report the information directly to the Board Chair.
2. Employees have the responsibility to report suspected fraud immediately. All reports can be made in confidence.
3. Any employee of the school system who receives a report of suspected fraudulent activity shall report this information promptly to the Superintendent or his/her designee.
4. The Superintendent or his/her designee shall conduct or cause to be conducted an investigation of employees, providers, contractors, or vendors as necessary and appropriate.

**RETAGLIATION PROHIBITED**

Any retaliation for reports made in good faith pursuant to this policy is strictly prohibited and may result in disciplinary action. All employees shall be free of intimidation or harassment when reporting to public bodies about matters of public concern, including offering testimony to or testimony before appropriate legislative panels.
Periodic communication should emphasize the responsibilities and channels to report suspected fraud.

*(SEE THE BOARD POLICY IN THE APPENDIX OF THIS HANDBOOK FOR REFERENCE)*

Section 35: Assessment Security Lowndes County School System Testing Plan 2016-2017 School Year

The Lowndes County School System conducts the assessment program as required by federal and state law. It is in compliance with the Every Student Succeeds Act (ESSA) and Georgia law relative to student assessment and data reporting. Lowndes County School System interacts with state and federal agencies relative to the assessment program and accountability mandates.

The testing coordinator handles assessment documents and reports including secure test materials, individual student score reports, and school/district data reports in both paper and electronic formats. Lowndes County School System delivers training/guidance related to the assessment program, assessment data, and accountability mandates to all stakeholders. All employees are informed in training that they are required to report waste, fraud, and abuse concerning Assessment Security.

Training Plan:

a. Materials:
   i. All school testing coordinators must have a sign-in sheet for documentation of teacher and proctor participation.
   ii. A GaDOE update on each test being administered will be provided as a reference/resource for school testing coordinators.
   iii. A District Update is provided to school testing coordinators to indicate any special requirements from the district.
   iv. School coordinator’s manuals and examiner’s manuals are usually available on the GaDOE’s website. These manuals to assist in training. All manuals must be kept secure and accounted for after each use.
   v. School coordinators should distribute the roles/responsibilities for all individuals being trained: coordinator, principals, examiners, and proctors. Discuss each group’s roles/responsibilities, and have individuals sign at bottom. (This document can be found in the Student Assessment Handbook from the GaDOE)

b. Topics:
   i. Checking in materials at the district office is the responsibility of the School Improvement and Assessment Director’s staff. They use the packing slip from each school’s shipment to check the accuracy of the delivery. Checks are made of confirmations and notations of inaccuracies. The school testing coordinators report to the district office to check in the presence of the School Improvement and Assessment Director’s staff. They then sign, date, and copy the packing slip.

A copy is kept in the School Improvement and Assessment Director’s office

ii. In order to maintain the integrity of the assessment program and its results,
security must be established and maintained. The responsibility of the assessment program at the school level rests with the principal and his/her designated school test coordinator.

1. Use the Student Assessment in Georgia Schools (PSC document) to discuss the testing ethics and consequences of violations.
2. Use the Examiner “Must Do” page from the GaDOE’s Student Assessment Handbook.
3. School Coordinators are trained in using the Lowndes County School System Incident Sheet, Access Log for Secured Test Storage Area, and Transcribing or Scribing Answer Document Form.

iii. School Coordinators are responsible for ensuring proper coding of test documents.
iv. School Coordinators are responsible for checking the accuracy of student information.
v. School Coordinators are required to have test examiner’s sign materials in and out each day during test administration.

vi. Proctors are used when required. All test proctors are trained on their roles/responsibilities.

vii. Testing Procedures are clearly articulated to ensure a smooth and problem-free test administration. Schedules, groups and location assignments, and special directions are distributed and explained before testing administration.

viii. Accommodations are well documented by the Special Education Department. School coordinators carefully check to ensure students are provided the appropriate and accurate accommodations for each individual test.

c. Collection of Materials
i. Sign-in and sign-out sheets are used to document who is responsible to each individual test booklet, the date, and number of test booklets received.
ii. Before testing documents are returned to district office, the school coordinator carefully accounts for all materials.
iii. During the document count, the school coordinator checks for complete information (Form Numbers, Labels, Names...) on each answer document.
iv. Materials are returned to the District Office, where the materials are recounted by the System Assessment Director and assistant.
v. Principal Certification Sheets are required on all standardized tests. This document must be returned at the time of delivery of the testing materials and is maintained for five years, per GaDOE guidelines.
APPENDIX

OneLowndes
WHERE EVERYONE FINDS THEIR FUTURE.
COMPLAINT PROCEDURES

Any individual, organization or agency (“complainant”) may file a complaint with the Lowndes County School System Board of Education if that individual, organization or agency believes and alleges that a violation of a Federal statute or regulation that applies to a program under ESSA has occurred. The complaint must allege a violation that occurred not more than one (1) year prior to the date that the complaint is received, unless a longer period is reasonable because the violation is considered systemic or ongoing.

Federal Programs for Which Complaints Can Be Filed

1. Title I, Part A: Improving Basic Programs Operated by Local Educational Agencies
2. Title I, Part C: Education of Migrant Children
3. Title I, Part D: Prevention and Intervention Programs for Children and Youth Who Are Neglected, Delinquent, or At-Risk
4. Title II, Part A: Teacher and Principal Training and Recruiting Fund
5. Title II, Part D: Enhancing Education Through Technology
6. Title III, Part A: English Language Acquisition, Language Enhancement, and Academic Achievement
7. Title IV, Part A, Subpart 1: Safe and Drug Free Schools and Communities
8. Title VI, Part B, Subpart 2: Rural and Low-Income Schools
9. Title IX, Part E, Subpart 1, Section 9503: Complaint Process for Participation of Private School Children
10. Title X, Part C-McKinney-Vento Education for Homeless Children and Youth
11. Filing a Complaint

A formal complaint must be filed in writing to the Lowndes County School System superintendent or his/her designee. The forms are located on the website and available at the Administrative Services Center.

The complaint must include the following:

A. A statement that the LEA has violated a requirement of a Federal statute or regulation that applies to an applicable program;
B. The date on which the violation occurred;
C. The facts on which the statement is based and the specific requirement allegedly violated (include citation to the Federal statute or regulation);
D. A list of names and telephone numbers of individuals who can provide additional information;
E. Copies of all applicable documents supporting the complaint’s position; and The address of the complaint.

Investigation of Complaint

Within ten (10) days of receipt of the complaint, the Superintendent or his/her designee will issue a Letter of Acknowledgement to the complainant that contains the following information:

A. The date the department received the complaint;
B. How the complainant may provide additional information;
C. A statement of the ways in which the department may investigate or address the complaint;
and

D. Any other pertinent information.

If additional information or an investigation is necessary, the Superintendent will have sixty (60) days from receipt of the information or completion of the investigation to issue a Letter of Findings. If the

Right of Appeal

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

The APPEAL must be addressed to:

Georgia Department of Education,
Office of Legal Services
205 Jesse Hill Jr. Drive SE
2052 Twin Tower East Atlanta, GA 30334

Superintendent:  ________________________________

Date:  ____________________
### Complaint Form for Federal Programs

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<tr>
<th>Person/department complaint is being filed against:</th>
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<tr>
<th>Date on which violation occurred:</th>
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<tr>
<th>Statement that the Lowndes County School System has violated a requirement of a Federal statute or regulation that applies to an applicable program (include citation to the Federal statute or regulation) (attach additional sheets if necessary):</th>
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<th>List the names and telephone numbers of individuals who can provide additional information</th>
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<th>Please attach/enclose copies of all applicable documents supporting your position.</th>
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<th>Signature of Complainant:</th>
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<tr>
<td>Lowndes County School System</td>
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<tr>
<td>ATTN: Superintendent Lowndes County School System 1592 Norman Drive</td>
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<td>Valdosta, Georgia 31601</td>
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**TITLE I PRINCIPAL ASSERTION FOR 1% ALLOCATION FOR FAMILY & COMMUNITY ENGAGEMENT**

The following Title I principals have agreed without coercion to pool all or part of their Family & Community Engagement allocation for a district-level Family & Community Engagement activity/project.

<table>
<thead>
<tr>
<th>Title I School</th>
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<th>Signature of Title I Principal</th>
<th>Amount toward District-wide Activity</th>
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Federal Programs Director’s Signature

Date ______________

Superintendent’s Signature

Date ______________
Georgia Department of Education Policies and Procedures (Reference)

Policy Title: Fraud, Waste, and Abuse Reporting, State Schools
Policy Number: SS-2002 Descriptor Code-2016A
Release Date: 6-25-15
Last Revised:

Purpose
To describe the Georgia Department of Education (GaDOE) policy in regard to the waste, fraud, and abuse reporting by employees of the State Schools.

Applicability
This policy applies to all employees at the State Schools.

Policy
Employees at the State Schools will report any known and/or suspected fraud, waste, and abuse of resources to GaDOE officials.

General Provisions
All personnel shall be familiar with, and faithfully observe all applicable ethics, laws, and regulations, including the following general principles and protocols.

Any employee of the State Schools may report information, in good faith, concerning the possible existence of any activity constituting fraud, waste, and abuse in or relating to any School System program or operation. All reports may be made anonymously as outlined in Reporting of Fraud, Waste, and/or Abuse document. Such a report shall be assessed and investigated by the GaDOE’s Internal Audit Department.

Examples of conduct which might be reported are any crime defined in Title 16 (the Criminal Code) of the Official Code of Georgia Annotated such as theft or fraud or bribery. No State Schools’ employee will make any report of fraud, waste, inappropriate conduct or abuse with knowledge that the disclosure was false or with reckless disregard for its truth or falsity. The GaDOE will not disclose the identity of the reporting employee without the written consent of the employee, unless the agency determines that disclosure is necessary and unavoidable during the course of the investigation. In these cases, the employee will be notified, in writing, at least seven (7) days prior to the disclosure.

No punitive action shall be taken against a State Schools’ employee for making a report of fraud, waste, or abuse, unless the disclosure was made with knowledge that the disclosure was false or with reckless disregard for its truth or falsity. Such punitive action includes threatening, recommending or approving personnel action, or directing others to take such action. Staff are expected to follow the directions in the Reporting of Fraud, Waste, and/or Abuse (FWA) Report which explains what an employee should do if he or she has knowledge of fraud, waste, and abuse. The GaDOE Internal Audit Department or designee should present a status/update report of allegations received to the State Board of Education’s Audit Committee at its monthly meetings.
LOWNDES COUNTY EMPLOYEE COMPLAINT POLICY

SECTION 1. PURPOSE; INFORMAL RESOLUTION PREFERRED

It is the purpose of this policy to implement the provisions of O.C.G.A. §20-2-989.5, et seq. In accordance with the foregoing, it is the policy of the Board of Education that certified personnel shall have the right to present and resolve complaints relating to certain matters affecting the employment relationship at the lowest organizational level possible. The Board of Education encourages all employees to resolve their complaints informally in a spirit of collegiality where possible. This policy and procedure is available where such efforts do not succeed, or where, for any other reason, the certificated employee desires to pursue this procedure.

SECTION 2. DEFINITIONS

"Level One Administrator" means the principal of a school with respect to teachers and other certificated personnel assigned to that school. With respect to the certified Administrators supervised by the Superintendent, the "Level One Administrator" shall be the Superintendent. In any case not covered by this paragraph, the "Level One Administrator" shall be the supervisory certificated person designated by the Board or in the absence thereof, by the Superintendent.

"Central Office Administrator" means the local school system Superintendent.

"Complaint" means any claim or grievance by a certificated employee of this school district which is filed pursuant to this policy and which comes within the scope of the policy.

"Notification" means delivery in person by a person designated by the Superintendent to the party entitled to notification, or deposit in the United States Mail, certified mail, return receipt requested or statutory overnight delivery, to the last known address of the party notified.

SECTION 3. SCOPE OF COMPLAINT; EXCLUSIONS

1. Scope - Unless excluded by paragraph (b) hereof, this complaint and grievance procedure is applicable to any claim by any professional employee certificated by the Professional Standards Commission who is affected in his or her employment relationship by an alleged violation, misinterpretation, or misapplication of statutes, policies, rules, regulations, or written agreements of this school district or with which the district is required to comply.
2. **Exclusions** - This procedure shall not apply to:
   - Performance ratings contained in personnel evaluation and professional development plans pursuant to Code Section §20-2-210;
   - Job performance;
   - Termination, non-renewal, demotion, suspension, or reprimand of any employee, as set forth in Code Section §20-2-940;
   - The revocation, suspension, or denial of certificates of any employee, as set forth in Code Section §20-2-984.5.

A certified employee who chooses to appeal under Code Section §20-2-1160, shall be barred from pursuing the same complaint under this policy.

**SECTION 4. HEARING RIGHTS, EVIDENCE: REPRESENTATION; DECISIONS: RECORDS**

A. **Hearing: evidence** - The complainant shall be entitled to an opportunity to be heard, to present relevant evidence, and to examine witnesses at each level, but the complainant may not present additional evidence at the Second or Third Hearing levels unless notice of the Complainant's intention and the evidence to be presented are submitted in writing five (5) days prior to the hearing to the Administrator who will preside at such level, and in the case of the local board, to the Superintendent. When hearing an appeal from a prior level, the local Board of Education shall hear and decide all appeals de novo.

B. **Representation** - The Complainant and the administrator against whom the complaint is filed or whose decision is appealed shall be entitled to the presence of an individual, including an attorney to assist in the presentation of the complaint and the response thereto, at the Central Office Administrator and at the local Board of Education level. The presence of any individual other than the Complainant and the Administrator at Level One is prohibited, except witnesses who present testimony or documents.

C. **Hearing Officer** - The local Board of Education may appoint a member of the State Bar to serve as law officer who shall rule on all issues of law and other objections, but such attorney shall not assist in the presentation of the case for either party.

D. **Overall Hearing Time Schedules** - The overall time frame from the initiation of the complaint until rendition of the decision by the local board and notification thereof to the Complainant shall not exceed sixty (60) days.

E. **Automatic Referral to Next Level** - Any complaint not processed by the administrator or the local unit of administration within the time frame required by this policy shall be forwarded to the next level for determination.

F. **Records** - Accurate records of the proceedings at each level shall be kept; the proceedings shall be recorded by mechanical means; all evidence shall be preserved and made available to the parties at all times; and all costs and fees shall be borne by the party incurring them unless otherwise agreed upon by the parties; except that the cost of preparing and preserving the record of the proceedings shall be borne by the local Board of Education; provided however, the cost of transcribing the transcript of
evidence and proceedings before the local Board shall be borne by the party requesting same, and all costs of the record on appeal to the superior courts and appellate courts shall be paid by the party required to do so by the laws relating thereto.

G. **Decisions** - Each decision shall be made in writing and dated, and shall contain findings of fact and reasons for the particular decision reached.

H. **Notice** - The decision at each level shall be delivered to the Complainant by a person designated by the Superintendent, either
   (1) being hand delivered or
   (2) being deposited in the U.S. Mail (certified mail, return receipt requested or statutory overnight delivery).

Notice to the Complainant shall be deemed to have been made on the date of hand delivery or on the date of deposit in the U.S. Mail by certified mail, return receipt requested or by statutory overnight delivery to the address stated in the complaint or, if not contained in the complaint, to the last known address of the Complainant on file with the Board of Education.

**SECTION 5. FIRST LEVEL: PRESENTATION; TIME: CONTENTS**

The complaint shall be presented in writing to the Level One Administrator within ten (10) calendar days after the most recent incident upon which the complaint is based. The complaint shall include the following:

A. The mailing address of the Complainant to which all notices and other documents may be mailed;
B. The intent of the Complainant to utilize this complaint procedure, clearly stated;
C. A reference or description of the statute, policy, rule, contract provision or regulation that is alleged to have been violated, misinterpreted or misapplied;
D. A brief statement of the facts reasonably calculated to show how such statute, policy, rule or regulation was violated or misapplied, and how it substantially affects the employment relationship of the Complainant; and
E. A statement of the relief desired.

The Superintendent shall prepare forms for use in accordance with the foregoing requirements.

**SECTION 6. FIRST LEVEL HEARING AND DECISION**

The Level One Administrator shall record the date of filing on the complaint, and shall give notice to the Complainant of the time and place of the hearing, either by mail or hand delivery. When notice is given by mail, it shall be sent by certified mail or statutory overnight delivery to the address set forth in the complaint. If no address was included in
the complaint, then the notice shall be sent to the last known address of the Complainant on file with the Board of Education. The Level One Administrator shall conduct a hearing on the complaint and render a decision thereon within ten (10) days of the filing of the complaint. The decision shall be dated and a copy shall be sent to the complainant as provided in Section 4 above. Where service or notice is made by certified mail or statutory overnight delivery as provided above, it shall be deemed to have been perfected when timely deposited in the mail, regardless of whether it was actually received or not.

SECTION 7. SECOND LEVEL; APPEAL FROM FIRST LEVEL TO CENTRAL OFFICE ADMINISTRATOR

A Complainant dissatisfied with the decision of the first level shall be entitled to appeal to the Central Office Administrator by filing written notice of appeal with the Office of the Superintendent. The appeal must be filed within ten (10) calendar days after the Complainant is notified of the Level One decision. The Central Office Administrator shall record the date of the filing of the appeal and shall notify the Complainant in writing of the time and place of the hearing in the same manner as provided in Section 6 above.

The Central Office Administrator shall obtain copies of all minutes, transcripts, documents and other records relating to the complaint and shall conduct a hearing and render a decision within ten (10) calendar days of the date of the filing of the appeal, or the hearing may be conducted by any designated representative of the Central Office Administrator who shall promptly submit his or her recommendations and findings to the Central Office Administrator for final decision. The decision shall be rendered and served on the Complainant and his attorney in accordance with Section 4(h).

SECTION 8. THIRD LEVEL. APPEAL TO BOARD OF EDUCATION

A Complainant or Level One Administrator dissatisfied with the decision of the Central Office Administrator may appeal to the Board of Education by filing written notice of appeal with the Office of the Superintendent. The appeal must be filed within ten (10) calendar days after the date of the decision as provided in Section 4. The Superintendent shall record the date of filing on the appeal, and shall promptly give written notice in the same manner as provided in Section 6 above to the Complainant of the time and place of hearing. The Complainant and the Administrators against whom the complaint is filed or whose decision is being appealed shall be entitled to appear before the Board of Education and be heard. The Board of Education may direct that a pre-hearing conference be held prior to the hearing to identify issues and facilitate presentation. The local board shall conduct a hearing and render its decision in writing within twenty (20) calendar days after the hearing, and perfect service thereof on the Complainant and his
SECTION 9. APPEALS TO STATE BOARD

Appeals from the decision of the local Board of Education shall be governed by the State Board Rule governing appeals and O.C.G.A §20-2-1160.

SECTION 10. REPRISALS PROHIBITED

No certificated personnel shall be subjected to reprisals as a result of filing any complaint under this policy. Any reprisals may be referred to the Professional Standards Commission.

SECTION 11. COLLECTIVE BARGAINING DISCLAIMER

Nothing in this policy shall be construed to permit or foster collective bargaining by or on behalf of any employee or group of employees.

SECTION 12. REPEALER

All policies and parts of policies in conflict herewith are repealed.

Superintendent ___________________________ Date ______________

Federal Programs Director ___________________________ Date ______________

Principal/Director ___________________________ Date ______________

The signatures above acknowledge that all personnel have been made aware of and understand the policies, procedures, and guidelines associated with filing a formal complaint with the Lowndes County School System and have been disseminated appropriately. Please submit the acknowledgement sheets of personnel to the HR Department and to the federal Programs Director by October 1st.
SAMPLE AGREEMENT

NEGLECTED AND DELINQUENT SERVICES AGREEMENT- LOWNDES COUNTY SCHOOLS

As a part of Title I, Part A funding, Lowndes County Schools provides services to help serve the students of our school system who reside in N&D facilities located within the boundaries our system. The following roles and responsibilities are a part of the compliance agreement:

SITE DIRECTOR:

- Direct, on-site supervision of services for N&D facility
- Annually meet with the System’s Program Director to discuss the needs of students served at the N&D facility and the effectiveness of the services being provided through Title I, Part A funds
- Communicate with the Programs Director (as need or necessary) to discuss concerns with any component of the services provided
- Sign-off on any documentation as an assurance that services are being provided in an acceptable way (i.e. time sheets)

FEDERAL PROGRAMS DIRECTOR

- Annually prescribe and provide services as determined through on-going collaboration with the Site Director of each N&D facility served
- Determine the methods and means for providing services in conjunction with
- Directly monitor/observe the services as provided at each N&D facility at least once per nine weeks
- Receive and approve required documentation to ensure expectations of the services are being provided as prescribed by the expectations of the facility, system, and provider(s)
- Assist the N&D facility by providing support and resources to help the students residing at the facility to access learning resources to address educational needs while at the facility

Evidence of the formal collaboration for the services provided for N&D facilities will be documented to include, but not limited to:

- Agenda, Sign-in Sheet of Participants, Minutes of Meeting
- Checklists, Timeline adjustments, Other relevant documentation/information
- Any corrective actions discussed

The Lowndes County School System will embrace the challenges of serving all students entrusted to our service and will help support the educational needs of students who reside at N&D facilities within our school system. We will collaborate and partner with each facility to help ensure that all students receive the needed support to help them achieve and succeed in their educational requirements and endeavors.

Superintendent

__________________________________________  Date ____________

Federal Programs Director

__________________________________________  Date ____________

Site Director

__________________________________________  Date ____________

Assistant Superintendent of Finance

__________________________________________  Date ____________
## FY 20 Requisition Form

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**GRAND TOTAL** $ 0.00

Signature of person requesting: ________________________________ Date: ________________

**Requisition Approval** (Central Office Use Only)

Director Signature: ________________________________

Date: ________________

Acct#: ________________________________

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ESOL Resource Guide
2018-2019
LOWNDES COUNTY SCHOOL SYSTEM
1592 Norman Drive
Valdosta, GA 31601
Mission
Working together to empower, challenge, and inspire - OneLowndes!

Vision
A learning community striving for excellence every day.

Values

- A safe and orderly school environment
- A focus on students
- Empowering leadership and teamwork
- Research-based and data-driven decision-making
- Effective and efficient operations
- Stakeholders satisfaction and support

Guiding Principles

- The safety, education, and welfare of our students are our priorities, and this must be reflected in our actions and our facilities.
- A safe, supportive environment nurtures teaching and learning.
- Excellent teachers are the foundation of quality instruction. All educators are accountable for the quality of work provided to students, and they must be committed to the continuous improvement of that work.
- All educators and staff must be continuous learners. They must be disciplined people, with disciplined thought and disciplined action.
- The purpose of the school is to ensure that each student develops the capacity to think, reason, and use one's mind well. Each student must develop those understandings, skills, and habits of the mind which make it possible to participate fully in the life of a diverse society operating in the context of an information-based global economy.
- The focus of all schools’ activities must be on providing students with quality work which engages them in meaningful learning.
- Every student can surpass their current level of learning. Students learn in different ways and at different rates; therefore, instruction should make every attempt to match learning styles and levels.
- All resources (time, people, space, information, budget, and technology) must be used effectively, efficiently, and continuously evaluated to improve the quality of education provided for our students.
- A home/school/community partnership with open communication is essential in providing each student the support needed to be successful.
- Each parent is a partner with the school system in providing a quality education to his/her child. Parent, student, and community input into every aspect of what we do as a school system is absolutely essential to everyone's success.
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**ESOL Program Goals**

- Value and build upon students’ academic, linguistic, and cultural backgrounds
- Assist students in reaching their full academic potential
- Assist students in developing their full potential in literacy and numeracy
- Create a supportive learning environment
- Build connections between ESOL and schoolwide programs
- Foster understanding and appreciation of diverse populations within the school and community
- Develop relationships between parents and schools to foster a supportive learning environment

**EDUCATIONAL APPROACH**

The Lowndes County School System uses a sound educational approach for providing English language development and meaningful program participation for its students. Pursuant to State of Georgia Law O. C. G. A. § 20-2-156, the Lowndes County School System has created a program for limited English proficient students whose native language is not English. This program is offered to all English Learners (ELs) in our system. The purpose of this program is to assist such students to develop proficiency in the English language, including listening, speaking, reading, and writing, sufficient to perform effectively at the currently assigned grade level. The responsibility for the ELs’ whole education, both in language and academic content, is shared with regular classroom teachers. English language support teachers, as well as mainstream staff and other support professionals, collaborate to determine accommodations and to make language and content as comprehensible as possible throughout the entire day for ELs. As a result, all teachers function as language teachers when ELs are enrolled in their classes.

**ESOL Delivery Models**

ESOL refers to the class, English for Speakers of Other Languages. This is the class where the language of English is taught to ELs. The Lowndes County School System ESOL Program provides language assistance service through the use of various delivery models:

- A scheduled class period – Students at the elementary level or middle level receive language assistance during a connections or exploratory class, or students at the middle and high school levels receive language assistance and/or content instruction in a class composed only of ELs.
- Pull-out model – Students are taken out of a general education class for the purpose of receiving small group language instruction from the ESOL teacher.
- An innovative delivery model approved by the Georgia Department of Education – ESOL-endorsed content area teachers differentiate instruction to provide both the grade level content and ESOL support with targeted language instruction.
- A consultative model specific to ELs where language support is provided through an Individualized Education Plan (IEP) – The ESOL teacher and SPED teachers collaborate regularly to support language acquisition.
- Push-in model (within reading, language arts, mathematics, science or social studies) – Students remain in their core academic class where they receive content instruction from their content area teacher along with targeted language instruction from the ESOL teacher. The Push-in model is clearly defined by the Language Assistance Rule (160-4-5-.02) and should NOT be interpreted in the same manner as the co-teaching model of instruction implemented by Special Education. In the ESOL Push-in model, the ESOL teacher is responsible for
language support, while the content teacher is responsible for delivery of academic content. Research indicates that strong teaching partnerships occur when teachers know each other’s curriculum, share responsibilities, plan together, share strategies, and share teaching equally. When students break into groups, the ESOL teacher should work with ELs, while the content teacher focuses on mainstream students. The ESOL Push-in delivery model allows the teachers to collaborate in order to facilitate meaningful language instruction with the content classroom and to appropriately plan differentiated instruction and tasks to meet the various proficiency levels of ELs.

The minimum time required for ESOL support varies by grade level:

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

For FTE reporting purposes, Lowndes County School System adheres to the following segment reporting guidelines:

- Students in grades K-3 may be served one segment per day.
- Students in grades 4-8 may be served up to 2 segments per day.
- Students in grades 9-12 may be served up to 5 segments daily.

Since classes at Lowndes High School are scheduled on a 4 x 4 block schedule consisting of 90 minutes, each blocked class will count as two segments.

**IDENTIFICATION, SCREENING, & ELIGIBILITY**

**Home Language Survey**

The purpose of this section is to describe the process for identifying and educating national origin minority (NOM) students in grades K-12 who have a primary or home language other than English (PHLOTE) and are ELs. Under federal law, schools must identify all PHLOTE students and then screen potentially eligible students for English language assistance.

When any student enrolls in a Georgia school, the questions on the required state approved universal Home Language Survey (HLS), published on the GaDOE ESOL website, must be administered as part of the enrollment process. The HLS is a series of questions intended to determine the student’s primary or home language. The following four questions appear on the HLS:

1. Which language does your child best understand and speak?
2. Which language does your child most frequently speak at home?
3. Which language do adults in your home most frequently use when speaking with your child?
4. In which language would you prefer to receive school communication? (This question is required beginning in 2019-2020)

In order to ensure that responses given on the HLS are accurate and legally binding, districts should make every attempt to administer this document in the home language of the caregiver. Translations of the HLS for LEAs use are available in several languages in the Forms Bank located within the GaDOE Guidance link on the GaDOE ESOL Unit webpage. If the answer to any of the questions indicates a language other than English, the student is a PHLOTE student and must then be screened for eligibility for English language assistance services. Students must be screened for eligibility within 30 days of enrollment at the beginning of the school year, and within 2 weeks of enrollment when students enroll during the school year.

*NOTE: In no way does this document automatically make a student eligible for ESOL services.*
1. When an EL transfers from another LEA within the United States or from a Department of Defense school with official records to support pre-determined eligibility and services within the past year, the student will be placed in language assistance programs.

2. If a PHLOTE student was screened in a non-WIDA state and was found not-eligible by that state’s criteria, the LEA must rescreen using the appropriate WIDA eligibility assessment to ensure that the student is adequately prepared to take Georgia content assessments.

LEAs may waive this requirement if the student has met the following criteria:

- Was screened for English language support assistance no more than 24 months (or the equivalent of two academic years) prior to enrollment in the current LEA; and
- Was enrolled and was successful in the general education program in the school he or she previously attended; and
- Performed at the met or exceeded level on that State’s content assessments (if such assessments were required and administered in the enrolled grades).

3. If there are no records available or records cannot be obtained within the time frames described above, it will be necessary for the LEA to take steps to ensure that the LEA meets the appropriate deadlines for identification and screening of transfer students.

4. Since a foreign exchange student is a “person in the United States,” and if the HLS responses for a foreign exchange student indicate a primary language other than English, the student must be screened for eligibility for language assistance services.

**Screening for Eligibility**

The Lowndes County School System uses the World-Class Instructional Design and Assessment (WIDA) screening tool and the WIDA – ACCESS Placement Test (W-APT) to assess eligibility for language assistance services for kindergarten students. The Lowndes County School System uses the World-Class Instructional Design and Assessment (WIDA) Screener to assess eligibility for language assistance services for students in grades 1-12.

The WIDA screening instruments are used to measure the English language proficiency of students who have recently arrived in the United States or in our school system. These screening tools are used to determine whether or not a child is eligible for English language instructional services and are only administered once. The Kindergarten W-APT and the WIDA Screener assess students' abilities in all four language domains (listening, speaking, writing, and reading), and evaluate social and instructional English as well as academic language corresponding to the subject areas of English language arts, mathematics, science, and social studies. The screening results provide scores for each language domain as well as combined composite scores, including a specified composite proficiency level.

**ESOL Eligibility Guidance**

The Lowndes County School System adheres to the Georgia Department of Education’s (GaDOE) eligibility guidance which is used to determine eligibility for language assistance services.

**Kindergarten W-APT Eligibility Screener**

The Kindergarten W-APT may be administered during pre-K roundup through the end of first semester first grade. The Kindergarten W-APT does not assign scores according to the range of WIDA English Language Development (ELD) levels 1-6. Instead, scores for speaking and listening indicate either low, mid, high, or exceptional proficiency. Scoring details can be found in the W-APT Test Administration Manual and on the scoring sheets.

Consistent with WIDA test administration guidelines, the procedures from second
semester pre-kindergarten through first semester kindergarten are as follows:
1. Administer the listening and speaking portions of the Kindergarten W-APT and note the
combined listening and speaking raw score.
2. If the student’s combined listening and speaking raw score is $\geq 29$, the student meets the
minimum criteria for English language proficiency and is not eligible for language support
services.
3. If the combined listening and speaking raw score is $\leq 28$, then the student qualifies for
language assistance services.

Consistent with WIDA test administration guidelines, the procedures from second
semester kindergarten through first semester first grade are as follows:
1. Administer all four components of the Kindergarten W-APT.
2. If the following is true:
   a. listening and speaking raw score is $\geq 29$, and,
   b. the reading score is $\geq 11$, and,
   c. the writing score is $\geq 12$, the student does not qualify for language support services.
3. If all three criteria are NOT met, the student qualifies for language support services.

The WIDA Screener

The WIDA Screener for students in grades 1-12 is divided into grade clusters: 1; 2-3;
4-5; 6-8; and 9-12. The instructions for the appropriate grade cluster screener to be administered
to the students in grades 1-12 are outlined in the WIDA Screener Test Administration Manual.
Administration procedures should be followed as indicated in the manual. Consistent with
current WIDA test administration guidelines, the WIDA Screener is administered to students
from second semester first grade through second semester twelfth grade.
The criteria for eligibility are as follows:
1. Administer a lower grade cluster form for students in the first semester of the year in a
grade-level cluster.
2. Administer all four components of WIDA Screener: listening, speaking, reading and writing.
3. If the student’s Grade Level Adjusted Overall composite score is $\geq 5.0$ on the WIDA
Screener, the student does not qualify for English language assistance services.
4. If the student’s grade level adjusted overall composite score is $< 5.0$ on the WIDA Screener,
the student is eligible for English language assistance services.

Eligibility flowcharts for Language Assistance Services for students in kindergarten and
grades 1-12 are provided on of the Georgia Department of Education’s ESOL Website.

If a student has been screened and determined ineligible for language support
services, the student may not be screened again at a future date for reconsideration of
eligibility without prior GaDOE ESOL Unit approval.
PLACEMENT INTO ESOL PROGRAM SERVICES

The Lowndes County School System recognizes its responsibility in providing its EL students with a program of service consistent with its chosen educational approach. Additionally, the school system understands the importance of providing information to parents of ELs in an understandable manner, to the extent practicable, in a language the parent can understand.

ELs are placed in age appropriate grade levels or courses. If a lower grade level placement is necessary due to lack of formal schooling, Lowndes County School System will not place a student more than one year below the native English-speaking peers of the same age. The district’s program of services to ELs addresses the need to provide evidence-based English language acquisition services and the need to ensure effective participation of ELs in all district academic and special programs.

The Lowndes County School System ESOL Program does not separate ELs unnecessarily for purposes other than to achieve the support program's goals. ELs are provided services in comparable facilities to those in which non-ELs receive services.

School counselors evaluate all transcripts for high school students. This process provides consistency in the evaluation process and allows for immediate placement into appropriate courses. When transcripts are not immediately available for evaluation, the counselor will make an informal assessment based on interview or other academic assessments so placements can be made in accordance with graduation requirements.

Steps Following Identification

Upon identification of a student as an EL, the Initial/Continuing Parent Notification of ESOL Services letter must be sent to parents notifying them of their child’s qualification for ESOL services. This letter is sent in English and in the parents preferred language of communication. This notification letter must be sent to the parents of every student who initially qualifies or continues to qualify for basic ESOL services.

Parent Waiver of Direct Language Assistance Services

Some parents of students identified as ELs may choose to waive language assistance services for their child; however, the district is still held responsible for providing language support under Office for Civil Rights law. Student schedule placement is optimized to ensure that an alternate means of providing the student with support for language development and proficiency is provided outside of structured ESOL classes. Parents who waive services must do so in writing on an annual basis, and written documentation is required.

Although the parents may have chosen to waive a formal language assistance program, the student will still be identified and coded as an 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 must participate in the ACCESS for ELs test on an annual basis until they meet eligibility criteria to exit the ESOL program.

Developing the English Learner’s Schedule

When making decisions regarding student placement, the district considers the services and support in place to ensure that ELs are developing social and academic language proficiency and are able to effectively participate in all academic and special programs within the district.

ELs are considered the same as any other students eligible for any program that will help them reach the same standards of performance asked of all students. Once an EL student enters a
mainstream education class, he or she may need language development or other types of support included in everyday classroom instruction. This support may include accommodations to the instructional activities, tasks, and assessments. As the EL attains fluency in English, fewer accommodations will be necessary.

**English Learners with IEPs**

The fact that an EL has a disability does not replace the need for language assistance. The plan for continuing to provide language assistance and support should be delineated in the student’s Individualized Education Plan (IEP). It is important to ensure that ELs are dually served through both programs. If, due to the student’s significant cognitive disabilities, it is determined that another means of support will be more beneficial to him/her, the Special Education team and the ESOL specialist must work together to determine the most effective plan and to provide needed support for implementation.

- If an EL is determined eligible for special education services, the IEP team will determine the type and degree of services (Special Education and ESOL) the student will receive.
- The ESOL teacher must be included as an active member of the IEP team for ELs with disabilities.
- If it has been demonstrated through testing that the student qualifies for special education services under the learning disability label or speech services label, the EL should be served in both programs.
- Scheduled time for ESOL services should not be reduced.
- Students should be served in both ESOL and Special Education if they qualify for both programs, unless the disability is deemed so profound that the severity of the student’s disability indicates a greater intensity of special services is required. If it is determined that the student’s needs will best be met by being served in multiple segments of special education, the ESOL specialist should work with school and district personnel to set up a consultative plan for that student’s language development. The ESOL specialist and the special education teacher should consult on a regular basis and maintain records of consultations as documentation of language support efforts.
- Any EL with an IEP must have a plan for language assistance services documented on the IEP.

**Monitoring Academic Progress of ELs**

Monitoring of classroom performance includes measures of English-language proficiency and curricular achievement. Schools should compare ELs’ achievement to that of academically successful English-speaking background students as well as mainstreamed language-minority students. Educators should use classroom performance and/or available achievement test scores to revise a student's academic program or change the types of language assistance services he or she is receiving.

Language-minority students must be compared with native English-speaking peers in knowledge of subject matter. It is important to assess a student's foundation for the acquisition of new information, as well as the ability to effectively participate in mainstream classes.

**ELs Participation in Regular Education**

The responsibility for the ELs whole education, both in language and academic content, is shared by the mainstream classroom teachers and English language support teachers alike.

- ELs will receive appropriate accommodations in general education courses.
- Data (from ACCESS, WIDA Screener, or W-APT) can provide each student's designated language proficiency levels to all teachers that work with the student using the WIDA CAN DO
Descriptors so that the mainstream classroom teachers have a clear understanding of what level of English language proficiency the student possesses.

- Mainstream classroom teachers will follow the accommodations for each student. Such accommodations should mirror the TPC decisions.
- ESOL teachers will meet with mainstream teachers to determine appropriate testing accommodations for each EL.
- Monitored ELs or EL-1, EL-2 students may receive appropriate testing accommodations for two calendar years upon exiting the ESOL program.
- The mainstream classroom teacher and the ESOL teacher will incorporate the WIDA standards into their lesson plans. These standards are as follows:
  - English language learners communicate for Social and Instructional purposes within the school setting.
  - English language learners communicate information, ideas and concepts necessary for academic success in the content area of language arts.
  - English language learners communicate information, ideas and concepts necessary for academic success in the content area of mathematics.
  - English language learners communicate information, ideas and concepts necessary for academic success in the content area of science.
  - English language learners communicate information, ideas and concepts necessary for academic success in the content area of social studies.

**Suggested Teaching Strategies for Teachers of ELs**

English learners do not just “soak up” the second language. They must be exposed to meaningful learning experiences based on their English language proficiency (ELP) level. In addition, they must be able to learn in a non-threatening learning environment.

The following information may provide suggestions and strategies to enhance the instruction of the EL in the mainstream classroom. Everyone is a lifelong language learner; therefore, all teachers are language instructors.

Suggestions appropriate to various grade levels and English proficiency levels are as follows:

- Remember the 5 R’s: Repeat, Rephrase, Reiterate, Restate, Reword
- Learn to pronounce each student’s name correctly.
- Speak slowly and enunciate clearly.
- Give students more wait time of 15-20 seconds.
- Assign a bilingual or English speaking peer or study buddy to assist the EL.
- Limit the use of pronouns.
- Avoid the use of slang.
- Develop and maintain routines to help ELs anticipate what will happen without relying solely on language clues.
- List and review instructions step by step.
- Make directions comprehensible. Determine your most common directions and illustrate or demonstrate them.
- Make words count by clarifying meaning.
- Emphasize 5-8 of the most important vocabulary words for a lesson.
- Avoid assumptions about routine American common language. ELs may not have experience with concepts such as Thanksgiving or Mother Goose or fairy tales. Explain idioms and cliches as needed to aid comprehension.
- With ELs who have very low proficiency levels, do not confuse the normal “silent period” of language acquisition with a lack of absorption.
- Find alternative materials that cover similar content but contain more illustrative support and simpler language.
● Make connections to the student’s native language.
● Use graphic organizers.
● Hands-on activities, role plays, chants, choral reading, rhymes, and drawings are all staples of a language rich environment.
● With students who have a low proficiency level, the use of imperative or command forms of verbs is more comprehensible.
● Use hand signals to accompany verbal instructions.
● Pantomime or use gestures when necessary.
● Avoid introducing new words without providing a context. It is a best practice to pre-teach vocabulary for ELs to have comprehensible input.
● Consider alternative ways to assess an EL. Provide word banks or offer an oral assessment.
● Have the EL view videos or listen to audio of content.
● Use read along books with audio.
● Use guided note taking strategies, or provide students with a copy or outline of notes.
● Cursive is difficult for many ELs to read and not all students are familiar with the Roman numerals.
● Model correct responses rather than overtly correcting the student’s errors.
● Provide opportunities for ELs to practice speaking with their English speaking peers.
● Keep strong communication ties with the parents or guardians using translators/interpreters when necessary.

Grading of ELs
● A student should never be penalized because of limited English proficiency.
● If a student is doing well academically, putting forth a determined effort, doing homework, making an attempt at learning, even if minimal due to lack of language acquisition, the student’s grades should reflect these efforts.
● If the student makes NO attempt academically, does not complete/turn in homework, does not participate in class, then the student’s grade should reflect this lack of effort.
● Teachers are NOT asked to lower their standards. Rather, teachers are asked to give ELs a grade based on the growth and progress of the English learner in each of the student’s classes. Many EL students may not understand the academic terminology used in our classrooms. Therefore, mainstream teachers and ESOL teachers work together to increase the EL student’s vocabulary. It is important to remember that acquiring academic language takes time.
● When posting grades, teachers are encouraged to use Comment 241 in the Infinite Campus gradebook. Comment 241 states: The grade issued is based on the student’s English language proficiency level in the content area.

Retention of ELs
   Much thought should be given before retaining an EL student due to lack of English language acquisition. If the teacher suspects the child has true learning problems NOT related to language, the child could be retained. In that case, the student should have a Response to Intervention (RTI) folder and referral to Student Support Team (SST) should be considered. It is important to remember that potential success at the higher grade should be heavily considered when making retention decisions.
Response to Intervention for ELs

Eligibility for ESOL services and placement in an ESOL class automatically is considered a Tier 4 Intervention. The ESOL class and support within that class meet the definition of the specially designed learning focus of Tier 4 with its emphasis on specialized programs, specialized instructional delivery and methodology. For the purposes of serving the student effectively and efficiently, the language minority student is served at the Tier 4 level during any scheduled ESOL classes; however, in mainstream classes, the student’s needs may not be such that Tier 4 level services are recommended. As is appropriate for all students, ELs in a general education class should receive Tier 1 interventions, and often the student will require Tier 2 interventions as well to successfully access and comprehend instruction. As the student progresses in language and academic proficiency, the level of interventions needed to support the student should decrease accordingly. For the specific purposes of ESOL services and language support for the majority of ELs, the Pyramid of Interventions functions as a regressive model rather than as a model of progressive interventions. As students near proficiency, often Tier 1 interventions, appropriate for all students, will be the only additional support needed.

Although the nature of the RTI Pyramid indicates all students begin at Tier 1 and move upward through the tiers only if the interventions at the previous tiers are not sufficient to allow them to achieve, Title III does not permit delayed eligibility testing for language minority students. Neither should language assistance be delayed in order to allow students to progress "normally" through the tiers. Eligibility for ESOL services automatically should be considered a Tier 4 Intervention. For the purposes of serving the student effectively and efficiently, the language minority student enters the Pyramid at Tier 4, and as the student progresses with language development and academic proficiency, the level of interventions needed to support the student will decrease accordingly. However, it also important to remember that many ESOL students spend most of their school day in the general classroom with accommodations provided according to the ELL/TPC. During this time in the general classroom, ESOL students should receive the same Tier 1 interventions as other students in the class. The accommodations provided in the Presentation or Response categories of the ELL/TPC are considered Tier 2 interventions appropriate to the student's English language proficiency needs, and improvement in language development and academic achievement should be noted as data for progress monitoring results. These students face unique obstacles, due to their lack of English proficiency, and it is essential that they receive immediate services and assistance in order to provide them with the educational support they require. Educators are attuned to the fact that ELs need immediate social and content language development and support and understand the need to provide ELs with more targeted interventions than those provided to all students. Although Tier 2 is a good entry level for many at-risk groups, the specially designed learning focus of Tier 4, with its emphasis on specialized programs and specialized instructional delivery and methodology, describes the basic tenets of ESOL instruction. Although ELs are considered to be at the Tier 4 level when eligible for ESOL services, this does not preclude those ELs who are found to need additional support from receiving it through the RTI process or, when they meet eligibility criteria, through Special Education. These programs would support and supplement the specialized language acquisition interventions of the ESOL program, as well as address any other learning problems that may have been identified.

There are times when it is suspected that something beyond typical English language acquisition is a barrier to the student’s academic achievement. In these situations, the RTI team should use their judgement and move the student to the Tier 3 level so that the student can receive appropriate services as soon as possible.
ASSESSMENTS and TESTING ACCOMMODATIONS

Georgia Milestones Assessment System

The Georgia Milestones Assessment System (GMAS) is a comprehensive summative assessment program spanning grades 3 through high school. Georgia Milestones measures how well students have learned the knowledge and skills outlined in the state-adopted content standards in language arts, mathematics, science, and social studies. Students in grades 3 through 8 take an end-of-grade assessment in various content areas, while high school students take an end-of-course assessment for each of the ten courses designated by the State Board of Education.

In certain situations, individual needs of EL students may warrant accommodations. The building-level ESOL teachers work with a team of teachers and the parents of ELs to determine whether or not testing accommodations are needed. Accommodations offered must be consistent with current instructional and assessment accommodations made in the classroom. Accommodations will be determined by the English Learner Testing Participation Committee (EL/TPC) and will be made only when appropriate documentation is filed for each eligible student. Only state-approved accommodations may be considered and included in the EL/TPC form. The determination of accommodations for assessment shall be reviewed at least once a year.

ACCESS for ELLs

ACCESS for ELLs is administered annually to all English learners in the Lowndes County School System. It is a standards-based, criterion referenced English language proficiency test designed to measure ELs’ social and academic proficiency and progress in English. It assesses social and instructional English as well as the language associated with language arts, mathematics, science, and social studies within the school context and across the four language domains of speaking, listening, reading, and writing.

Testing Accommodations

- Testing accommodations shall be made only when appropriate documentation is on file.
- Administration of assessments and use of test administration accommodations shall be according to established guidelines and procedures in the test administration manual(s).
- Accommodations will result in either standard or nonstandard administration. Specific information concerning standard or nonstandard nature of an accommodation is noted and published in the GaDOE Student Assessment Handbook for the respective fiscal school year.
- Selected accommodations must reflect the practices used in the student’s classroom.

TRANSITION FROM EL SERVICES

The Lowndes County School System uses criteria established by the GaDOE to determine when a student has sufficient English language proficiency to meaningfully transition from the ESOL program. As ELs reach proficiency and are ready to exit language assistance services, it is imperative to ensure these students have attained a degree of proficiency that will enable them to achieve academic success at levels equal to those of their native English-speaking peers.
Exit Criteria

The GaDOE ESOL Unit, the Office of Assessment and Accountability and LEA ESOL representatives from across the state collaborated to determine the appropriate level of proficiency necessary to ensure ELs’ success upon exiting ESOL services.

Kindergarten Students

The Kindergarten ACCESS for ELLs student report contains one proficiency level for each of the four domains and four composite scores. The composite proficiency level reported is the accountability score. For determining whether a kindergarten student has met the requirements to exit language assistance services, the ACCESS for ELLs Overall Composite Proficiency Level scores and the individual language domain scores must be utilized.

In order to exit English language assistance services, kindergarten ELs must score a Composite Proficiency Level (CPL)/Overall score of ≥5.0 with at least a 4.5 in the writing domain and at least a 5.0 in each of the remaining domains (listening, speaking and writing). Kindergarten ELs who score less than 5.0 overall or whose writing domain is < 4.5 or listening, speaking or reading domain is < 5.0 are not eligible to exit language assistance services.

Students in Grades 1-12

The student must be administered all components of the ACCESS for ELLs 2.0/Alternate ACCESS assessment. If the student achieves an overall score of 5.0 or greater, the student must be exited from the ESOL program.

Students achieving CPL scores between 4.3 – 4.9, may be deemed English proficient and exited from English language assistance services based on the English Learner Reclassification Review Committee (ELRRC) decision as documented on the English Learner Reclassification Review Form.

Exit flowcharts for students in kindergarten and grades 1-12 are provided on the Georgia Department of Education’s ESOL Website.

Post-Exit Monitoring

ELs who meet the criteria for proficiency are no longer eligible for language assistance services and must be exited. Title III law requires that districts monitor ELs for two calendar years following exit from language assistance services. If an exited student transfers from another state or a private school and the two year monitoring was not completed prior to enrollment, we continue to monitor the student for the remainder of the monitoring period. The Lowndes County School System maintains documented evidence that the student was monitored throughout the two-year monitoring phase.

Content teachers continue to work with ESOL teachers to make needed adaptations to content material and present it to all second language learners in a less demanding language format. Content teachers will provide students with increasing opportunities to demonstrate what they know by using a variety of formative and summative assessments.

At the end of each grading period, an ESOL teacher contacts the student’s teachers to find out if the student is adjusting and succeeding academically and to identify any academic or social needs. The teacher teams review grades, standardized test scores, talk with student, and talk with parents, if necessary, to ensure a smooth transition from the ESOL program. If there is evidence the student is struggling in one or more content areas, the first step is to ensure the student is provided any instructional supports available to students within the school and to ensure that the RTI team is aware of their lack of academic progress and success.
Exited ELs who Struggle during the Monitoring Period

Exited ELs may struggle in some of their academic courses, even after they have been deemed English proficient and have met the criteria for exiting ESOL services. Therefore, during the two calendar year monitoring period required under civil rights law, exited ELs may still require instructional accommodations in some of their content courses. If there is evidence that the exited ELs are struggling in one or more content areas, the first step is to ensure that they are provided any instructional supports available to all students within the school and to ensure that the RTI team is aware of their lack of academic progress and success. The RTI team should review the exited ELs’ data and determine next step appropriate interventions and any increased Tier monitoring for RTI purposes. After instructional interventions have been put in place and progress is measured over time, as data, documentation, and any additional evidence are reviewed, the RTI team and progress monitors should determine whether the exited EL is struggling because of a lack of content knowledge or because of a lack of English language proficiency. ESOL teachers are essential to the RTI review process, as they understand the process and time-frame of second language acquisition.

Possible considerations may include reviewing the students' academic history:

1. Were exited ELs educated formally in their home countries? Did they have consistent schooling or did their education have prolonged periods of interrupted schooling or no schooling?
2. What were the exited ELs' ACCESS for ELLs 2.0 scores and sub-scores in each domain?
3. Were the ELs exited from English language assistance services based on a previous year’s Language Assessment Conference?
4. Were the ELs exited from English language assistance services based on the English Learner Reclassification Review Committee (ELRRC) decision? If the ELRRC made a determination, was the ACCESS for ELLs overall CPL score at the high end of the 4.3-4.9 range?
5. Were the ELs’ Georgia Milestones Language Arts/ELA End of Course scores borderline for meeting standards or were they significantly above the minimum requirement?

In the courses in which they are struggling, what are their areas of difficulty?

1. Are they having difficulty specifically in the domain of writing or reading, for example, or are there factors outside of language involved?
2. If the exited ELs are struggling in a particular course, is it a course in which they have always had difficulty?
3. Are the teachers differentiating instruction specifically to reach and support second language learners?
4. Is it a lack of concentrated effort on the exited ELs' part, or do they turn in all assignments, but perhaps the quality of the work does not meet the requirements for a passing grade?
5. If so, would appropriate differentiation allow them to adequately demonstrate their knowledge and comprehension of the content, or do they lack the background content information to be able to access the curriculum and fully comprehend the material?
6. Are they receiving academic support to compensate for any lack of background information, if that is the case? Some of these factors that should be considered when making a determination as to appropriate interventions for the students and/or whether the problem is content related or English language proficiency related.

The final analysis of those reviewing evidence and data should determine whether the problem truly is a lack of language proficiency, rather than a lack of content knowledge, cognitive issues, or a disability. The English Learner Reclassification Review Committee (ELRRC) form must be completed.
If it is determined that the problem is truly a lack of English language proficiency, the RTI team should then meet, review the evidence, and determine whether the exited ELs should be placed back into English language assistance services. If so, the students' coding in the district’s student information system (SIS) will be changed to EL-Y. When the student again meets the criteria for exiting and is considered proficient, the monitoring period will begin again and last for two full calendar years as required.

**Data Reporting for Exited ELs**

For the purposes of student record reporting, the coding status for ELs who have met the criteria for exiting language assistance services and who then will begin the two-calendar year monitoring period changes from EL-Y to EL-1. In order to document first or second year monitoring status, ELs are coded in Student Record as EL-1 for the first year after exit and EL-2 for the second year after exit. Beyond the monitoring phase, the third year after exit students are coded EL-3, then EL-4 for the fourth year after exit. At the end of the fourth-year post-exit, the student will be coded as a former EL, EL-F.

**STAFFING AND RESOURCES**

The Lowndes County School System understands its obligation to provide the personnel and resources necessary to effectively implement its ESOL programs. This obligation includes having teachers meet the professional qualifications outlined by the district to provide language assistance services, trained administrators who can evaluate these teachers, and adequate and appropriate materials for the ESOL programs.

**Professionally Qualified Teaching Staff**

Lowndes County School System ensures that there are an adequate number of teachers to instruct EL students and that the teachers have mastered the skills necessary to effectively teach in the ESOL program.

The State of Georgia offers a clear renewable certificate in the field of ESOL (P-12) as well as the ESOL Endorsement which allows an educator to teach ESOL to students in the grade levels approved for the educator’s content certification.

**Roles of the ESOL Teacher**

- Collaborate with registrars and counselors to ensure proper enrollment
- Administer appropriate screeners, analyze data, and place student in the proper program
- Notify parents (in home language) of results and placement
- Provide testing accommodations appropriate to each individual student
- Provide Title III parent outreach sessions
- Participate in Title I Parent Engagement for ELs
- Ensure each school knows how to communicate with parents in the proper language
- Provide trainings to classroom teachers
- Collaborate with classroom teachers and document collaboration
- Attend RTI and IEP meetings and ensure EL information in the IEP is correct and updated
- Provide instruction for ELs in domains of reading, writing, listening, and speaking
- Teach, plan, and focus on language acquisition (ESOL teacher is NOT a tutor.)
- Introduce American culture to ELs in ESOL class
- Monitor students who have exited and collect required forms from mainstream teachers
- Ensure the EL Screener Tab in SLDS is current
- Certify annually to administer the WIDA Screener and ACCESS Tests for ELLs
Ensure that EL Folders are organized and include all Title III requirements.
The EL Folder is maintained by the ESOL Teacher. The EL Folder is maintained with permanent records. The following documents are maintained:

- Home language survey
- WIDA Screener or W-APT or out of state screener scores for ESOL eligibility
- Copy of Annual Initial/Continuing Notification of ESOL of Program Placement letter in English and native language
- Annual Test Participation Committee Document of EL Testing Accommodations with signatures
- Copy of Annual ACCESS Test Notification Parent Letter in English and native language
- Annual ACCESS Test Scores in English and native language
- Copy of Annual ACCESS Test Results Parent Letter in English and native language
- Copy of Annual Parent Waiver of Services (if applicable)
- Copy of Annual Notification of ESOL Exit Letter in English and native language (when applicable)
- Annual Cumulative Profile

**District-Wide Sustained Evidence-Based Professional Learning**

The Lowndes County School System ESOL program recognizes the need to promote and maintain a well-informed faculty and staff who work directly with EL students in our schools. A broad, general overview is provided at the beginning of each year for all certified staff. Likewise, the ESOL teachers provide additional information and support for the teachers who specifically provide instruction to EL students in the regular classrooms. These teachers are included in evidence-based professional learning opportunities that directly relate to instructional strategies for EL students. Teachers may directly participate in EL evidence-based professional learning opportunities (when available/appropriate), or they may participate in re-delivery sessions from those who have participated first-hand. In addition, ongoing professional learning is provided through the LCS Teachers of ELs Google Classroom PLC.

**Resources**

The Lowndes County School System understands the importance of providing the financial resources to enable student success. Both local funds and federal Title III funds are allocated for critical priorities such as evidence-based professional learning, translation services, and the purchase of evidence-based instructional resources.

Federal and state laws require that all students participate in the state-mandated assessment program. English Learners (ELs) participate in the Georgia Milestones Assessment System (GMAS), the ACCESS for ELLs, and numerous locally developed formative and summative assessments.
FAMILY & COMMUNITY ENGAGEMENT & NOTIFICATION

**Home Language Survey**

The home language survey is given to all parents of students to complete at registration. If a language other than English is identified, students will be screened for ESOL services.

**School-Home Communication**

In accordance with federal law, school-home communication must be provided in a language that our parents understand. In an effort to facilitate this communication, translation and interpretation services are available at no charge to parents and guardians who require assistance in understanding all district and school related information. Lowndes County Schools provides assistance to parents/guardians of ELs in their home language. Lowndes County Schools uses World Wide Interpreter and Transact.com as resources for school home communication. Parents, guardians, or students who need assistance in a language other than English may call 229-245-2250.

**Parent Notifications**

The district assures that parental notification is provided in English and/or the parent preferred language of communication as required for:

- Notification of Initial or Continuing Program Placement Letter
- Notification of Annual Assessment for English Language Proficiency Letter
- Annual assessment score reports to show growth in language proficiency (Listening, Speaking, Reading, Writing)
- Notification of Exit from ESOL Program Letter (when applicable)
- Notification of Title I Student Eligibility for Supplemental Language Support Services (only for ELs receiving supplemental language support)

**Parent Outreach**

The Lowndes County School System annually provides parents of ELs with opportunities to be active partners in their child’s participation in programs for ELs. Topics include classroom expectations; available school and community resources and services; and how to understand report cards and standardized test scores. Lowndes County Schools’ representatives not only provide instruction in how to help their children at home but also provide supplementary reading and math materials in both Spanish and English to parents of ELs.

The school designs Family & Community Engagement activities (either at the school level, the district level, or both) to promote the importance of EL instruction and enhance the home-school connection. Classroom visits, Lunch-n-Learns, and a district-wide expo have all been used as models to allow parents to experience firsthand the dynamics of EL teaching and learning in our system. These annual programs are designed based on parent surveys, the Comprehensive Needs Assessments, and parent input to help address what parents feel are the most important issues for their children’s continued language growth and development.

**Student & Parent Handbook**

The Lowndes County School System provides a Student and Parent Handbook in English and Spanish. It is available in print and also posted on the Lowndes County Schools webpage (which reflects the most current version as changes are made during the year). This handbook is provided for the purpose of informing students and families about the system’s policies and procedures.
Complaint Procedures

Any individual, organization, or agency may file a complaint with the Lowndes County School System (LCSS) if they believe and allege that LCSS is violating a federal statute or regulation regarding the Every Student Succeeds Act (ESSA). The complaint must allege a violation that occurred not more than one (1) year prior to the date the complaint is received unless a longer period is reasonable because the violation is considered to be systemic or ongoing. A written complaint should be address to: Lowndes County Board of Education, Attn: Federal Projects Director, 1592 Norman Drive, Valdosta, Georgia 31601.

PROGRAM EVALUATION

Lowndes County School System uses the program evaluation developed by the Georgia Department of Education. This allows the school system to periodically evaluate and revise, if necessary, its Title III and/or ESOL program.

ESOL INFORMATION AND RESOURCES

GaDOE ESOL webpage:
http://www.gadoe.org/Curriculum-Instruction-and-Assessment/Curriculum-and-Instruction/Pages/English-to-Speakers-of-Other-Languages-(ESOL)-and-Title-III.aspx

WIDA Consortium webpage:
http://www.wida.us/
for information about the Consortium, the WIDA English Language Proficiency Standards, Performance Definitions, Model Performance Indicators, Can Do Descriptors, screening instruments and annual assessment of proficiency

GaDOE Assessment webpage:
http://www.gadoe.org/Curriculum-Instruction-and-Assessment/Assessment/Pages/default.aspx
for information about testing accommodations and ACCESS for ELLs

GaDOE Curriculum webpage:
for information about Graduation Requirements and Response to Intervention

Georgia Professional Standards Commission:
https://www.gapsc.com/
for information about teacher certification
## Glossary of Frequently Used Acronyms

<table>
<thead>
<tr>
<th>Acronym</th>
<th>Description</th>
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<tbody>
<tr>
<td>EL</td>
<td>English Learner (term that refers to the student)</td>
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<tr>
<td>ELD</td>
<td>English Language Development</td>
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<tr>
<td>ELL</td>
<td>English Language Learner (older term)</td>
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<tr>
<td>ELL/TPC</td>
<td>ELL Test Participation Committee (testing accommodations document)</td>
</tr>
<tr>
<td>ELRRC</td>
<td>English Learner Reclassification Review Committee</td>
</tr>
<tr>
<td>ESOL</td>
<td>English for Speakers of Other Languages (class that provides language support)</td>
</tr>
<tr>
<td>ESSA</td>
<td>Every Student Succeeds Act</td>
</tr>
<tr>
<td>GaDOE</td>
<td>Georgia Department of Education</td>
</tr>
<tr>
<td>GMAS</td>
<td>Georgia Milestones Assessment System</td>
</tr>
<tr>
<td>HLS</td>
<td>Home Language Survey</td>
</tr>
<tr>
<td>IEP</td>
<td>Individualized Education Plan</td>
</tr>
<tr>
<td>LEA</td>
<td>Local Education Agency</td>
</tr>
<tr>
<td>LEP</td>
<td>Limited English Proficiency (older term)</td>
</tr>
<tr>
<td>NOM</td>
<td>National Origin Minority</td>
</tr>
<tr>
<td>PHLOTE</td>
<td>Primary Home Language Other Than English</td>
</tr>
<tr>
<td>RTI</td>
<td>Response to Intervention</td>
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<tr>
<td>SST</td>
<td>Student Support Team</td>
</tr>
<tr>
<td>WIDA</td>
<td>World-class Instructional Design and Assessment</td>
</tr>
</tbody>
</table>
LINKS FOR RELEVANT INFORMATION
(Click on the titles/links below or copy/paste the address provided into your browser)

FRAUD-
https://en.wikipedia.org/wiki/Fraud
https://www.grants.gov/learn-grants/grant-fraud.html

LOWNDES COUNTY PERSONNEL HANDBOOK

LOWNDES COUNTY PERSONNEL ACCEPTABLE USE POLICY (TECHNOLOGY)

LOWNDES COUNTY SCHOOLS FINANCE INFORMATION

LOWNDES COUNTY SCHOOLS HUMAN RESOURCES- PERSONNEL RECORDS PROCEDURES

LOWNDES COUNTY SCHOOLS FACILITIES USE AGREEMENT

STAFF COMPLAINTS & GRIEVANCES (BOARD POLICY)

eBOARD FOR LOWNDES COUNTY

GEORGIA PROCUREMENT REGISTRY