



Vidalia City School System

Dr. Garrett Wilcox, Superintendent of Schools

Ginger B. Morris, Director of Federal Programs

Purpose of this Handbook

The purpose of this handbook is to provide a systematic approach to implementing the regulations of federal programs to ensure compliance with federal guidelines at the system and school level. A description of each federal program along with general information regarding program requirements is included in this handbook. Following the guidelines presented in the handbook will ensure consistency and uniform practices throughout the school system. School level administrators are encouraged to use the information to ensure that federal programs are being implemented accurately and effectively for impacting student achievement.

The step-by-step approach contained in this handbook will promote uniformity in operations as staff seeks to carry out duties and responsibilities. The Georgia Department of Education (GaDOE) provides local educational agencies (LEAs) extensive guidance on the over-arching requirements for federal programs via the on-site monitoring document that is used to ensure that LEAs are meeting all statutory requirements of the 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.



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Section 1: Monitoring of Schools and Programs

Vidalia City School District Federal Monitoring Process

The Georgia Department of Education requires that Vidalia City Schools monitors the implementation of federal programs and the expenditure of all funds associated with these programs. The specific requirements are as follows:

- LEA/Program Director will conduct self-monitoring of its schools and programs sufficient to ensure compliance with federal program requirements, including Title I, Part A, Title I, Part C, Title I, Part D, Title II, Part A, Title III, Part A and the McKinney Vento Act.
- The Director of Federal Programs will attend trainings hosted by the GaDOE and other sources to maintain proficiency in federal program compliance requirements.
- Director of Federal Programs will provide technical assistance to local schools.
- Director of Federal Programs self-monitoring will include monitoring all program expenditures to verify that all program expenditures comply with federal program requirements.
- Director of Federal Programs will maintain all documentation LEA may need for future auditing/monitoring according to the LEA monitoring document, which is issued annually by GaDOE.
- In years when Vidalia City School District does not receive an on-site visit, the Director of Federal Programs will complete the Self-Assessment Monitoring Document and submit it to the GaDOE.
- Vidalia City Schools will undergo monitoring by GaDOE on a four year cycle for all Federal Programs; VCS will undergo monitoring by GaDOE every year when receiving McKinney-Vento Grant Funds. The LEA/Program Director will participate in training and technical assistance updates as provided by the GaDOE prior to 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/Director of Federal Programs will respond in a timely manner with a Corrective Action Plan that must be approved by the GaDOE. The appropriate Federal Program Education Specialist will monitor implementation of the Corrective Action Plan.

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

Vidalia City School District federal programs make use of monitoring as a means of regular observation and recording of activities taking place in local schools. Critical to this process is the feedback provided to schools that can assist in improving student academic achievement. District monitoring addresses the following:



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- Supplement Not Supplant- All funds provided under these programs will supplement—not supplant—federal, state, and other local funds that the applicant would otherwise receive.
- School Wide Plans- All schools are assisted in developing, revising, & improving schoolwide program plans.
- Equipment Usage Monitoring- Training is conducted on allowable equipment usage and walk-throughs are conducted to ensure equipment is being used appropriately.
- Budgetary- **Director of Federal Programs** verifies budgeted items are aligned with identified needs.
- Academic Assessments- Our Testing Coordinator works with Administrators, Counselors, Superintendent, Assistant Superintendent of Teaching & Learning, and Director of Federal Programs ensuring that correct data is being used to determine site needs.
- Parental Notifications- Director of Federal Programs monitors that all required parental notifications are distributed in a timely manner.
- Professional Development- All Assistant Principals must re-deliver and monitor Parent Engagement Strategies.
- Ensuring all other activities are carried out in accordance to federal compliance guidelines.

The Elementary and Secondary Education Act of 1965 (ESEA) requires the state educational agency (SEA) to monitor the implementation of program requirements and the expenditure of federal funds and was reauthorized under the **Every Student Succeeds Act (ESSA) on December 10, 2015**. Georgia's monitoring process consists of the following components as part of the **Georgia Systems of Continuous Improvement**:

1. Program Requirements- LEAs must submit for approval an annual Comprehensive LEA Improvement Plan (CLIP) through the consolidated application process. Federal Program Specialists review each component to ensure that the plan contains allowable activities for use and budgeting of federal funds. Once the CLIP has been approved, the LEA submits a budget reflecting the approved CLIP activities for review and approval by the Federal Program Specialists assigned to the LEA.
2. Monitoring of Expenditures- LEAs must submit for approval an annual budget through the consolidated application process. Federal Program Specialists review each application and budget to ensure that expenditures are appropriate for program area before approving LEA budgets. Once budgets are approved, Federal Program Specialists track funds drawn down by LEAs for expenditures to ensure that LEAs are likely to meet the drawdown of funds timelines.



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- a. FLP expenditures (SET ASIDE) will be monitored monthly by the building principal and Federal Program Director and checked against timeline for expenditures and drawdowns throughout the year if applicable. *As of 2017 Vidalia City Schools has no Focus or Priority Schools.
 - b. N & D expenditures (SET ASIDE) will be monitored throughout the year by the Federal Program Director and program director of each facility after initial consultation with each group.
3. Single A-133 audit- LEAs with single audit findings are flagged for technical assistance
 4. On-Site Monitoring- An SEA on-site Cross-Functional Monitoring Team visits a LEA to review the criteria included in the LEA monitoring form.
 5. Self-Monitoring Checklist- LEAs not receiving an on-site visit completes the Self-Assessment Checklist and submits to the GaDOE.
 6. 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 auditor monitoring report and the written complaint. In addition, on-site monitoring outside of the scheduled cycle may be arranged as needed if an LEA evidences serious or chronic compliance problems.

Communication and Monitoring

Monitoring of federal programs (**Title I, Title II, Title III, Title IV, Title VI-B and Title IX**) 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 Federal Programs Conference, the Director of Federal Programs convenes a meeting of all school administrators during a summer orientation. Administrators receive training on policies and procedures and guidance for operating federal programs.

Administrators are given detailed information of expectations and copies of program guidance. Specific training is provided in all facets of the various federal programs (**Title I, Title II, Title III, Title IV, Title VI-B and Title IX**). A Federal Programs Handbook is provided to each administrator and discussed in detail by the Director of Federal Programs. This handbook includes timelines, budget forms, inventory information, schoolwide implementation, Flexible Learning Plans (FLPs), Intradistrict Transfers, parental involvement requirements, Professional Qualified Staff requirements, fraud policy and other areas of federal programs as needed.

Meetings are held numerous times throughout the year with administrators, academic specialists and parent involvement facilitators to discuss specific budget information and best practices. Phone calls and emails are a daily occurrence between school staff and Director of Federal Programs.



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Onsite Monitoring Procedures

All schools that are recipients of federal funds are subject to ongoing monitoring by the Director of Federal Programs throughout the school year. The Director of Federal Programs conducts on-site monitoring of all schools throughout the year for compliance. Feedback is provided to the principals via checklists and descriptive information. In addition, emails, staff meetings, and phone conversations take place throughout the year as a means of providing on-going monitoring and communication with each school.

Timeline for Monitoring of Schools

June/July

- Provide Summer Workshop for Administrators of all schools following the Federal Programs Annual Conference to update them on any new guidelines and to provide guidance for “new” administrators.

Workshops will include such topics as listed:

- Budgets
- Purchasing
- Compliance Issues
- Parental Involvement
- Schoolwide Plans
- Monitoring
- Academic Achievement
- Inventory
- Ethics/Fraud/Complaints
- CLIP
- Homeless Students
- EL & Immigrant Students
- Flexible Learning Plans (if applicable)

July

- Work with administrators to create required FLP letters (if applicable) and get them mailed in a timely manner.
- All departments submit final revisions of CLIP to Director of Federal Programs by July 15.
- Final district meeting to revise district parent involvement policy and plan.
- Submit CLIP to GaDOE by July 31.



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- Review parent involvement policies, school-parent compacts and schoolwide improvement plans for the upcoming school year.
- Distribute Title I site budgets.

August

- Work with administrators and school personnel on annual revision of plans. The Director of Federal Programs and School Administrators review the plans and the budgets to ensure that funds are being spent according to the plan and the plan has the necessary components. Director of Federal Programs also meets with Homeless Liaison, N & D Facilitators, and all Title personnel to discuss and determine budget needs.
- Meetings with Administrators, Parent Involvement Facilitators, Homeless Liaison, N & D Facilitator, Title personnel, Teaching & Learning Department, Media Specialists, Superintendent, Finance Department, Human Resources, and other departments pertinent to the Federal Programs.
- Inventory all items purchased by Title I.
- Annual Title I meeting window begins.
- Submit a copy of “Parent’s Right to Know” letter for review/approval
- Post approved “Parent’s Right to Know” letter on school website.
- Verification of all required parental notices have been distributed. Give guidance on Title I Annual Meeting, School Parent Compacts, and Parental Involvement Policies.
- PQ Superintendent Sign off- Aug. 31

September

- September: Attestation Forms (prior to 10/1)
- Inventory Due- Sept. 30
- Review of August Expenditures & payroll reports.

October

- Verification required that all Title I schools have held an informational Title I Annual Meeting at respective schools.
- Title I, Part A; Title II, Part A; Homeless Education budgets due in Consolidated Application- Oct. 1
- Completion Report- Oct. 31 (due from the Chief Financial Officer)
- Notifications mailed to private schools serving students of the availability of Title I-Part A and Title III services.
- Notifications mailed to private schools within the LEA of eligibility to participate in planning professional learning activities in the next fiscal year Title II, Part A program.



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- Monthly School Expenditure Reports Due- September Expenditures- Oct. 10
- Review of parent engagement activities at Title I Schools.
- Review of previous month expenditures and payroll reports
- Copies of Parental Involvement Plans placed in Parent Resource Centers
- Submit documentation of building parent capacity
- Random onsite review of federal programs compliance (posting of required homeless posters, PI policies, SIPs, school-parent compacts, parent resource room)

November

- National Parent Involvement Month. Review of parent engagement activities at Title I Schools.
- Monthly School Expenditure Reports Due- October Expenditures- Nov. 10
- Review of previous month expenditures and payroll reports
- Random onsite review of federal programs compliance (posting of required homeless posters, PI policies, SIPs, school-parent compacts, parent resource room)

December

- Monthly School Expenditure Reports Due- November Expenditures- Dec. 10
- Review of previous month expenditures and payroll reports
- Random onsite review of federal programs compliance (posting of required homeless posters, PI policies, SIPs, school-parent compacts, parent resource room)
- Consult with private schools wishing to participate in Federal Programs for upcoming fiscal year
- Review of parent engagement activities at Title I Schools.
- Submit documentation of building parent capacity
- 50% of budgets should be expended

January

- Periodic Certifications for first ½ of school year.
- Begin preparations for next year SWP.
- Revise SIP to align with carryover funds
- Budget carryover funds
- Monthly School Expenditure Reports Due- December Expenditures- Jan. 10
- Review of previous month expenditures and payroll reports



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February

- 80% of budget must be expended.
- Review of parent engagement activities at Title I Schools.
- Monthly school expenditure reports due- January Expenditures-Feb.10
- Review previous month expenditures and payroll reports
- Random onsite review federal programs compliance (posting of required homeless posters, PI policies, SIPs, school-parent compacts, parent resource room)

March

- Annual Survey of Parent Involvement to gauge the effectiveness of parental involvement activities.
- Schools compile data at their site to determine needs for the following year.
- Redelivery of 3rd parent engagement professional learning modules.
- Stakeholder survey opens for Title I and Title II
- Monthly school expenditure reports due-February Expenditures-Mar.10
- Review previous month expenditures and payroll reports
- All non-salary funds should be expended-Mar. 31

April

- Begin revisions of Title I Parental Involvement Policy, Title I Schoolwide Plans, and School-Parent Compacts
- Stakeholder survey for Title I and Title II closes
- Monthly school expenditure reports due- March Expenditures- Apr. 10
- Review previous month expenditures and payroll reports
- Random onsite review federal programs compliance (posting of required homeless posters, PI policies, SIPs, school-parent compacts, parent resource room)

May

- Periodic Certifications
- Principal survey of Title I needs
- Needs Assessment for upcoming year
- Revision of Parental Involvement Policy, School-Parent Compact, Title I Schoolwide Plan.
- Review previous month expenditures and payroll reports
- Updated Federal Programs Inventory



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Ongoing Throughout School Year

- Work with administrators and school staff on annual revision of plans. The Director of Federal Programs reviews the plans with central office level staff to ensure that funds are being spent according to the plan and the plan has all the necessary components.
- Monthly meeting with administration. Additional training as needed. Administrators are welcome to schedule a meeting anytime assistance is needed with Federal Programs.
- Onsite monitoring of inventory and programs at schools.
- The Director of Federal Programs provides technical assistance and meets regularly with principals, Human Resource, PL Coordinator, Homeless Liaison, ESOL Coordinator, Special Education Director and Parent Involvement leadership.

School Improvement Plans (SIP) includes data that drives student achievement and are led by Teaching & Learning (Curriculum Director) and monitored by the Director of Federal Programs and throughout the year. Based on continuous data analysis, administrators and leadership teams makes changes to the school improvement plans.

Feedback on the schoolwide assistance plans is sent to each administrator via the schoolwide checklist. Corrections to the plans are made as needed by school site and updated copies are sent to the district office.

Monitoring of Neglected & Delinquent Facilities

Paul Anderson Youth Home is the only facility for neglected & delinquent students in the Vidalia City School District. It is monitored on the same timeline as other schools in the district.

Monitoring of Private Schools

The Director of Federal Programs monitors private schools (if private schools elect to participate in the federal programs). Invitations for private schools to consult in participation in federal programs the following year are sent in the fall, usually October, via receipt delivery. A meeting is held usually in December to present information about the programs available to students in private schools. Currently Vidalia City School District is not serving any private schools.

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. All schools have data rooms that are used during the data analysis process. The System Testing Coordinator compiles a data notebook that is discussed with each school at the beginning of the school year. This information is used to



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identify the root cause of the problems that keep the school from achieving academically. This information is discussed in detail and it reflected in the updated schoolwide plans each year.

Reporting and Corrective Action Process

(Audit and Monitoring Findings)

Vidalia City School System makes an on-going effort to comply with all federal programs requirements. The federal programs office makes a continuous effort to cooperate with state and federal auditors and state monitors. All corrective actions through the audit process or Cross-Functional Monitoring findings are fully implemented.

Once the audit/Cross-Functional Monitoring report is received, the Director of Federal Programs will review all items. 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 the Director of Federal Programs will write a report. The report will then be 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. Corrective action from previous monitoring is discussed with administrators in order to assist them in understanding critical need for compliance in Federal Programs. In addition, GaDOE monitoring findings from all districts is shared with administrators as a means of understanding the impact of non-compliance. Professional learning is provided based on the needs but, in addition, professional learning is used as a preventive measure to ensure that all Title staff has a clear understanding of all expectations of every facet in federal programs. The Director of Federal Programs, along with district level staff, and outside consultants provide on-going 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 Director of Federal Programs maintains a file of all training conducted throughout the year. This file contains all staff trainings, handouts, meeting agendas, meeting notes, sign-in sheets, phone logs, etc. Ongoing monitoring of the training is conducted by the Director of Federal Programs to ensure compliance.

Inventory Management

Inventory management is an essential element for the control and accountability of federal funds. Equipment that is tangible property having a useful shelf life of more than one year must be included in the inventory. Components of inventory management include:

- Inventory Management System
- Inventory Labeling
- Equipment Maintenance Procedure



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- Equipment Use
- Equipment Loss, Damage, or Theft
- Equipment Disposition
- Off-site Use of Equipment
- Physical Inventory

Federal programs equipment is entered and tracked through the inventory management spreadsheet. When the purchase order routing process is complete, information is entered in the inventory spreadsheet. The spreadsheet contains the following categories:

- Item description
- BOE labels which includes Title I, Part A and a number
- Serial number
- Federal Award Identification Number (FAIN #)
- Condition (Excellent, Good, Fair, Poor)
- Funding source (e.g., 1750 Title I)
- Vendor
- Cost of Item
- Acquisition date (MM/DD/YYYY)
- Use of Equipment (examples: “I” – Instructional, “PI” – Parental Involvement, “A” - Administrative)
- Disposition (Damaged, Surplus, Trade-in, Obsolete, Lost/Stolen)
- Date of Disposition
- Location of item (add an additional column)

All equipment should be properly labeled for inventory tracking. BOE labels will mark the item by federal program and provide a quick reference number. Permanent markers or paint pens are acceptable when labels cannot be used (e.g., I-pad cases can have the number of the I-pad on the outside).

If a classroom teacher has a problem with federal program equipment, the teacher should email to notify the principal of the problem. After notification, the staff member will email the school media specialist. The school media specialist will try to fix or repair the problem. If the media specialist is unable to do so, the district Technology Director will be e-mailed to assist with the repair. The media specialist should seek guidance from the federal program director if equipment is permanently damaged or undergoing repair for an extended, unreasonable amount of time.

When receiving federal programs equipment, the media specialist should ensure that the equipment is issued to the proper location. Furthermore, the equipment must continue to be used for that or a related purpose. The equipment’s “Use” is to be documented on the physical inventory.

Equipment that is lost, stolen, or maliciously damaged must be reported to the police department for an investigation. The principal or designee should follow up with the police department to obtain a copy of the police report. A copy should be kept on file at the school and a copy should be sent to the Federal Program Director.



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Obsolete equipment may be disposed of by using the *Vidalia City School System Surplus Equipment Sale Form*. Items should be identified by federal program on the form. The maintenance department will physically remove the equipment. A copy of the surplus form is kept by the media specialist, a copy is sent to the district Technology Director, and a copy is sent to the Federal Program Director. There should not ordinarily be an instance where equipment becomes obsolete in less than 5 years; however, case-by-case exceptions can be considered with Federal Program Director approval. Damaged items due to malicious actions can be disposed of but must include a police report and a surplus property form.

Off-site use of equipment for any activity other than school-related meetings or workshops is strictly prohibited. Teachers should not remove any federal program equipment from the school building under any circumstances (e.g., personal birthday parties for children, church events, school reunions). Equipment needed for school-related meetings or workshops will be moved by the media specialist, administration or a designee of the federal program.

Inventory is maintained at the school level by the media specialist. A yearly physical inventory is required. An inventory spreadsheet will be provided by the district in excel. The media specialist will verify the existence, location, use, and condition of the equipment using the spreadsheet as documentation. After completion of the physical inventory, the federal program designee and School Staff will sign the *Inventory Check Log*. The log will remain in the front of each school's Inventory notebook.

In the event that private schools attend the Private School Consult meeting held in the fall and chooses to participate in Title I, the equipment purchased by Title I must be returned to Title I if the school ceases to serve as a Title I school. The Title I department will conduct the school's yearly inventory. The private school should contact the Title I department for questions or guidance concerning inventory maintenance and procedures.

Principals receive a copy of the *Georgia DOE General Guidelines for Title I Equipment Inventory and Disposition – Title I, Part A* each year. Principals and the media specialist should contact the federal program director with any questions concerning the guidelines or the inventory procedures.

Section 2: Comprehensive LEA Improvement Plan (CLIP)

Section 1112 of the Title I, Part A of the Elementary and Secondary Education Act of 1965 (ESEA) specifies that local educational agencies (LEAs) may receive funds under ESEA if the LEA has an approved plan on file with the Georgia Department of Education. The submitted LEA plan is part of the consolidated application under Section 9305 of ESEA. The three-year CLIP has three major components: ESEA/IDEA Plan Descriptors; System Profile; LEA Implementation Plan. The following programs are part of the CLIP: Title I, Part A- Programs for Disadvantaged Children; Title I, Part A- Flexible Learning Plan; Title I, Part A- School Improvement 1003(a); Title I, Part A- School Improvement 1003(g); 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 VI, Part B- Rural Education Achievement Program (REAP); Individuals with



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Disabilities Education 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); State Professional Learning.

Vidalia City District CLIP Review Process

The LEA Comprehensive Improvement Plan is updated annually.

CLIP revisions take place annually using prior year data and needs assessment information. The CLIP serves as the plan detailing coordination of various federal programs and identification of needs and in-turn budgeting for such needs with federal funds. The first comprehensive needs assessment review begins in March/April of each year. The Superintendent, central office personnel, principals, assistant principals, and other lead school personnel review student achievement data which may include: EOC, CCRPI data, local benchmarks, retentions, and course failures. Administrators, school personnel, parents, and community members review the data at parental involvement meetings, community collaborative, school level SIP sessions, and grade level meetings. All stakeholders are invited to participate via mail, email, telephone, and in person. The district conducts an annual survey each year that allows parents to provide input on district policies and procedures. Parent input is examined and considered from these surveys. Documentation includes sign-in sheets, agendas, meeting minutes (if available), emails, and comment cards. Several subsequent meetings are held to garner input from all stakeholders. Input is also solicited through our district website, community forums, and summer planning sessions. Input is solicited annually from district, school, and department leaders to revise the plan. The Director of Federal Programs gathers all input and updates the CLIP.

Once the CLIP is submitted, it is reviewed by the Federal Program Specialist and DOE, if revisions are requested the Director of Federal Programs revisits the CLIP and makes amendments accordingly with the necessary departments.

Timeline for LEA Comprehensive Improvement Plan

March/April	Begin needs assessment for upcoming school year
March/April	Meet with District Leadership Teams to determine PL needs
April	Meet with school administrators and department heads to review CLIP
May	Meet with parents and community stakeholders to review and offer suggestions for CLIP
June-July	Meet with District Leadership Team to finalize CLIP
July	Submit CLIP to GaDOE



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Resolution for Unapproved Plans

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

Section 3: Parental & Family Engagement

The Vidalia City School System recognizes that greater family involvement is crucial if our students are to learn more, to achieve higher academic standards and to succeed in a world that might otherwise pass them by.

Parent Notifications and Communication in an Understandable and Uniform Format

When parents mark on the enrollment form that they need correspondence in another language, to the extent practical, efforts are made to provide either written support or support through an interpreter. VCSS has school staff that is fluent in various languages. All parent communication is written in a format so that the content is easily understandable. The district also uses a program to translate documents into parent's native languages.

Annual Title I Meeting

Vidalia City Schools have their annual Title I meeting by October 31. These meetings are separate from the Open House meetings. It is the responsibility of the principal and assistant principal in coordination with the Parent Involvement Coordinator (PIC) to arrange meeting times and invite all stakeholders to the meeting. The school level administration and PIC will be responsible for collecting and submitting documentation of the required Title I annual meeting, including a copy of the sign in sheet, agenda, and PowerPoint (if applicable) to the Director of Federal Programs. Meetings are announced in multiple ways at each school via flyers, websites, PowerSchool announcer, school marquees and school newsletters. Each school completes the Title I Annual Meeting Assurance Form.

Parent Resource Centers

All schools have parent resource centers. A variety of materials and resources are available to parents for use at the school ore checkout. Most materials have been purchased based upon parent requests on the parent involvement surveys. Schools are required to notify parents of the availability of the resources in the parent resource center and must have their parent resource room prepared the day of open house. Schools will advertise their parent resource center availability through flyers, newsletters, brochures, and websites. Each school will complete the Notification of Parent Resource Area Assurance Form.



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Parent Notifications

At the start of the school year, Priority, Focus, and Title I Alert Schools are required to notify all parents of eligible Title students of their school's designation status under the ESEA Flexibility Waiver. These schools must send dated letters to parents as well as provide the notification in multiple other ways. The letters for Title I All School Designation, No School Designation, and Reward School Designation parent notification are optional; however, all Title I schools, regardless of designation must notify all parents that their child attends a Title I school.

School Designation Status- Priority Schools

Vidalia City School System does not have any schools designated as a Priority School at this time. Should a school become identified as a Priority School the district will follow the guidelines as outlined by the GaDOE.

School Designation Status- FOCUS Schools

Vidalia City School System does not have any schools designated as a Priority School at this time. Should a school become identified as a Priority School the district will follow the guidelines as outlined by the GaDOE.

School Designation Status- No designation

Vidalia City Schools that have not been given a school designation for the year notify parents in multiple ways that their child attends a Title I school. Schools post of their website, marquee sign, letterhead and give information at the Annual Title I meeting that they are a Title I school. Each school submits documentation to the Federal Programs department showing how they notify parents they are a Title I school.

ESEA Public School Choice

What are a school district's responsibilities under HB 251?

By July 1, 2009, a district must establish and adopt a universal, streamlined process available to all students to implement the new transfer requirements. A district must annually notify parents by July 1 of each year regarding which schools have available space and which of these schools parents may choose to request a transfer for their children. A district may notify parents by letter, electronic means (email or Web site), or by other reasonable means (e.g., local newspaper). A local process shall include an explicit deadline for parents who want to submit transfer requests. Parents should be provided at least 14 days in which to apply. A district may have a single enrollment period each year, provided it complies with the July 1 notification period. At its election, a district may also decide to accept students throughout the school year as additional space becomes available.

- The district notification may be in the form of a letter, electronic means, or by other reasonable means.



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****Vidalia City Schools operate under a charter system.
HB251 does not apply to charter schools.****

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

Required Set-Aside for Flexible Learning Programs (FLP):

Flexible Learning Programs will initially be funded through a minimum of 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. No schools in the Vidalia City School District have been labeled as Priority or Focus.

Required Interventions for Priority and Focus Schools:

- All Title I Priority and Focus Schools must offer a Flexible Learning Program (FLP)
- In addition, all Title I Priority and Focus Schools must develop a written plan that outlines how the Title I Priority and Focus Schools will implement an FLP program. The FLP plan must be approved by the GaDOE's Title Programs Unit prior to implementation.
- All Title I Priority and Focus 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 at least 3-5 percent of the school's Title I, Part A allocation for professional development related to the school's FLP. Focus Schools are not required to set aside 3-5 percent of their school's Title I allocation for professional development. However, Focus Schools may set aside funds for professional development if the need for professional development is addressed in the school's Title I schoolwide plan.

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 school designated as Priority or Focus Schools. Parents will be invited using multiple means of communication including flyers sent home with students, marquee messages, PowerSchool/Parent Portal announcements, and school and system Facebook and web announcements. In addition, notification will be sent via U.S. mail to parents informing them of their child's eligibility to participate. The building principal will be responsible for using a variety of communication methods at school level and the Federal Program Director will insure the information is posted to the system website and system Facebook page to insure parents understand the school status and programs and services at the school that has a designation of Priority or Focus. Vidalia City Schools only had one school on Focus list and they came off the list for the 2017-2018 school year.



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Capacity for Parent & Family Engagement

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

The Director of Federal Programs will utilize Edivate professional development program to enhance parental involvement for student success- Teachers Involving Parents. The following professional development will be delivered to school personnel through modules and redelivery to ensure that all Title I schools implement a program to address the six requirements to build parent capacity:

- August 2017- Getting Parents Involved: Why Schools are Isolated
- September 2017- Barriers to Parental Involvement
- October 2017- Levels of Parental Involvement
- January 2018- Parents as Decision Makers
- February 2018- Reaching out to the Community
- March 2018 – Making School the Center of the Community
- April 2018 – Dealing with Criticism

All parent engagement activities will be under the direction of the Assistant Principal. They will monitor to insure modules are being done in a timely manner and will redeliver any training to school staff. The Director of Federal Programs will require sign-in sheets, agendas, and meeting minutes (if applicable) as part of the re-delivery documentation. Each session must be re-delivered within 30 days.

To determine effectiveness of building parent capacity, documentation will be submitted monthly to the Federal Programs office for review to ensure that schools are building parent capacity.

In addition to these mandatory professional learning courses, the following will be offered to all staff based on individualized wants/needs by notifying the Assistant Principal:

- Communicating with Parents- Tips & Strategies
- Homework- Including Parents in the Process
- Welcoming Environments- Just how family-friendly is your school/classroom?
- Helping Parents Integrate Teachable Moments at Home
- Evaluating your Strategies and Ideas

The Central Office will also host some professional learning courses to parents after hours on the following topics:

- Understanding academic content
- Using the Parent Portal, PowerSchool to access student grades
- Homework & Study Habits
- How to Increase Lexile Scores at Home
- Technology Tips & Apps



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Each school will follow the six requirements as provided in the System Family Engagement handbook for building schools' and parents' capacity for strong parental involvement.

Parent Involvement Policy Overview

Vidalia City School System has an on-going commitment to our parents. Parental Involvement is defined as the participation of parents in regular, two-way, and meaningful communication involving student academic learning and other school activities. As a conduit for their child's success, the district will assist parent of all socioeconomic levels in the solidifying their ongoing commitment to their child's success.

Parent Involvement Plans

District and school parent involvement plans are reviewed and revised annually with parents and other community stakeholders (teachers, principals, administrators, school council members, and other school personnel). The district will solicit input for the revision of the district plan by posting to the county website and presenting the plan at community forums and parent engagement workshops. All parents, teachers, administrators, and community stakeholders will be invited to provide input. The district will hold the meeting in the spring to revise plans for the next school year. The LEA Parent Involvement Policy checklist will be utilized to ensure all components of the policy is met. Revision dates will be clearly marked on each plan. Each school principal and/or academic specialist will also solicit the input of their parents to revise their school improvement plan, parent involvement policy and school-parent compact. The principal and/or the academic specialist will submit agendas, sign in sheets, meeting minutes (if available) of where parents were given the opportunity to provide input. The school district uses the comments provided by parents during the review/revision of documents to plan parenting programs and better serve students and parents of Vidalia City Schools.

Timeline for Parental Involvement Plans

- April Begin revision of Parental Involvement Plan
- May Give all stakeholders the opportunity to provide input for the revision of the plan
- June Revise Parental Involvement Plan
- July Plan should be completed and ready for the upcoming school year
- Aug.-Sept. Distribute plan to all parents and stakeholders

Required Documentation for the Revision of the Parental Involvement Policy

To ensure that we are in compliance when revising the School Parental Involvement Policy the following documents must be submitted to the Director of Federal Programs when revising the policy:

9/18/2017-Revised



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- Documentation showing how parents and all stakeholders were invited in multiple ways to give input on the policy- a copy should be sent to the Director of Federal Programs prior to being sent out
 - Invitations and announcements must clearly show that parents are being given the opportunity to give input.
 - Dated Agendas/Minutes detailing what will be shared with parents at stakeholder input meetings
 - Sign-in sheets indicating the role of person attending (parent, teacher, administrator, community member, other)
 - Summary of parent input received for revision of policy (surveys, meetings)
 - Statement of how the revised policy will be distributed to Title I parents in a timely manner
 - Must submit copies of how policy was distributed in multiple ways (screen shot of Web page, school newsletter, student handbook)

The Director of Federal Programs will review all submitted documentation following the guidelines and checklist provided by the GaDOE. Once documents are reviewed and found to be satisfactory the school will be notified they are in compliance with the revision process for the School Parental Involvement Policy.

Distribution of Completed Plans

Vidalia City School System posts the following plans on the district website or each school website located at www.vidalia-city.k12.ga.us

- District Parent Involvement Policy
- Title I School Improvement Plans
- Title I School Parental Involvement Policy
- School-Parent Compact
- Parents Right to Know
- Comprehensive LEA improvement plan
- Complaint procedures
- Flexible Learning Plans (if applicable)

School-Parent Compacts

All Title I schools are required to have school-parent compacts. It is the responsibility of the principal in coordination school leadership to make sure all compacts are reviewed and revised annually.

The review and revision will occur in the spring of each year. Revision dates (month-day-year) will be clearly marked on each compact and the School-Parent Compact checklist will be utilized to ensure all components are present in the compact.

All parents, teachers, students (when appropriate) and community stakeholders will be given the opportunity to provide input for the revision of the compact.



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Parent compacts will include responsibilities for the teacher, parent, and students. Each school compact will be aligned with the individual goals and needs of the school. School-Parent compacts will be sent home at the beginning of each year and signed by the parent, student, and school representative and kept on file at the school site. As part of the monitoring process the Director of Federal Programs will visit each school and pull a sample of School-Parent Compacts to ensure all signatures are obtained.

Timeline for Revision of the School-Parent Compact

- April Begin revision of the School-Parent Compact
- May Give all stakeholders the opportunity to provide input for the revision of the compact
- June Finalize revision of School-Parent Compact
- July School-Parent Compacts should be ready for the upcoming school year
- August Send within first 10 days of school- School-Parent Compacts

Documentation for School-Parent Compact

To ensure we are in compliance when revising the School-Parent Compact the following documentation must be submitted to the Director of Federal Programs when revising the Compact:

- Documentation showing how parents and all stakeholders were invited in multiples ways to give input on the compact- a copy should be sent to the Director of Federal Programs prior to being sent out
 - Invitations/Announcements must clearly show that parents will have the opportunity to provide input
- Dated Agendas/Minutes detailing what will be shared with parents at stakeholder input meetings
- Sign-in sheets indicating the role of the person attending (parent, teacher, administrator, community member, etc)
- Summary of parent input received for revision of compact (surveys, meetings)
- Procedures the school will follow to ensure that School-Parent Compacts are signed and returned to the school in a timely manner
 - Timeline should be developed showing what the anticipated return date of compacts are and the procedures that will be followed for compacts not returned or not signed

The Director of Federal Programs will review all submitted documentation following the guidelines and checklist provided by the GaDOE. Once documents are reviewed and found to be satisfactory the school will be notified they are in compliance with the revision process for the School-Parent Compact.



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Required 1% Set Aside for Parental Involvement

Parent Involvement: Principals have the option of expending the required 1% set aside Parent Involvement funds or submitting it back to the system level. If schools opt to spend the 1% at their school site, they must have parent input on how to spend the funds. If they opt to submit the funds back to the system level they will complete a Districtwide Parent Activity Project Assurance Form.

Timeline of Parent Input for Required 1% Set Aside for Parental Involvement

- April-May
 - Begin soliciting for input when meetings are held to revise the Parental Involvement Policy, School-Parent Compact and School Improvement Plan. (surveys, meetings)
- June
 - Align survey reports with the Parental Involvement Policy * The policy drives the budget*
- August- September
 - Share with Parents at Annual Title I Meeting how funds will be spent.

Documentation for Required 1% Set Aside for Parental Involvement

Each school must submit the following documentation to the Director of Federal Programs:

- Documentation showing how parents were given the opportunity to provide input on how to spend the 1% (Screen shot of Web page if survey posted to school Web site, copy of paper survey, copy of invitations sent to parents and stakeholders, meeting minutes along with agenda and sign in sheets indicating role of person(s) in attendance).
- Summary of suggestions for expending parental involvement funds.

Documentation will be reviewed by the Director of Federal Programs to ensure budget aligns with the Parental Involvement Policy. If in compliance, the school will be notified and purchase orders can be submitted to the Federal Programs Office for processing.

School Improvement Plans

School improvement plans are revised each spring for the following school year. Each school leadership team conducts a work session at which representatives from each grade level, content area, and department, as well as administration and parents to review and revise the plan. School administrators then submit the plan to the central level for review and completion of the system improvement plan. System leaders also support schools in developing, revising, implementing and coordinating school improvement and schoolwide plans during



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administrative and curriculum team meetings. During the meetings, data is analyzed and used to identify and develop solutions to challenges related to instructional strategies, professional learning, parent involvement, and budgets. Parents are provided multiple opportunities to provide input to the school improvement plan and the system improvement plan. Once revisions are reviewed and approved at the central level, plans are placed on the website and available at each school for review. Each school completes the Schoolwide Improvement Plan Distribution Assurance Form.

Section 4: School Improvement (1003a)

Priority Schools

Vidalia City School System currently does not have any schools identified as Priority Schools.

Focus Schools

Vidalia City School System currently has one school (JRTrippe Middle School) identified as a 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 Focus School has decreased the number of non-proficient students by 25% over a period of three years. High schools identified as Focus Schools due to graduation rate average for three consecutive years or show an eight percent graduation rate improvement over a period of three years.

Monitoring of School Improvement

All Title I schools within the Vidalia City School System conduct Schoolwide Programs. This allows all children and all parents of Title I schools an opportunity to have equal access to all related Title I assistance. The LEA will utilize the district Curriculum Director along with the GaDOE to establish clear expectations for personnel as they systemically support continuous improvement in all schools.

Review and Approval of School Improvement and Schoolwide Plans

School Improvement and Schoolwide Plans are updated each summer for the following school year. Each school leadership team conducts a meeting at which representatives from each grade level, content area, department, district and school administration and parents meet to review and revise the plan. During school leadership retreats, instructional strategies, parental involvement initiatives, and professional development activities are planned after a careful analysis of various data. Assistance is also provided to schools in their use of school



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improvement funds to accomplish initiatives in their school improvement and schoolwide plans. School administrators then present their school plans at the leadership retreat as they work with other schools, system leaders, and parents to develop a system improvement plan. It is through this process that the LEA oversees the development of school improvement plans. All Vidalia City Schools use the GaDOE schoolwide/school improvement plan template.

Monitoring of Use of Funds

The Director of Federal Programs reviews each purchase request prior to purchasing. Budget reports are also reviewed monthly.

Section 5: School Improvement 1003(g) SIG

Priority/Focus Schools

Vidalia City School System has one school designated as a FOCUS School at this time. The LEA will follow the procedures as outlined by the GaDOE.

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, identify and explain the areas of need what will be addressed by the FLP offered at each school:
 - Core content area(s)
 - Subgroup(s)
 - Graduation Rate(s)
- Describe the multiple educationally related selection criteria by core content area served with the weighting that will be applied to the criteria per school to determine the rank order list of eligible students by greatest academic need
- Describe the scientifically based research strategies that the LEA will implement to ensure that supplemental academic intervention time is designed to support students meeting academic performance goals.
- Describe the program delivery model that the LEA/school will implement.
- Describe the professional development that the district will provide for the FLP instructional staff.
- Describe the procedures the LEA will implement to ensure that the instructional goals of the FLP students are aligned with the CCGPS.
- Describe the procedures that the LEA will implement to maximize the enrollment and attendance of the students with the greatest need for the FLP.
- Describe the procedures the district/school will use to monitor the implementation of the program and the tracking of all required data.



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- Describe the internal controls the LEA will implement to promote efficiency, assure the fidelity of the implementation of the LEA's FLP program and to safeguard assets and/or avoid fraud, waste, and abuse.
- Describe the LEA's evaluation plan.

Submission of the FLP plan

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

- A list of the schools that are required to offer a Flexible Learning Program, their classification, and the school's Title I status.
- Project how much the LEA is intending to budget on the Flexible Learning Program in the following areas:
 - Program coordination/service delivery
 - Materials/Supplies
 - Transportation
 - Snacks
 - Tutor Costs
 - Total Cost of the FLP program
 - Evaluation method(s) to be used

Timeline

August-Develop list of eligible students based on federal tier guidelines

August-Mail letters home inviting eligible students

August-Begin serving students using a Flexible Learning Program

January-Conduct a second enrollment and mail 2nd letter home inviting eligible students

May- Conclude program and complete evaluation

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 student's subject was determined
- Rank-ordered list of all eligible students designating whether student is enrolled in the program or not
- 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



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- Strategies to be used if goals are not met by student
- FLP delivery model
- The days of the week the FLP occurs
- Transportation provided and for whom

Monitoring and Evaluation

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

- Customer Satisfaction
 - What is the overall experience of stakeholders with the program?
 - Stakeholder surveys
- Service Delivery
 - Are the SEA, LEAs, and programs in compliance with laws and regulations?
 - Annual monitoring data, program documentation, federal reporting, public reporting, technical assistance, etc.
- Effectiveness
 - Are programs contributing to increased student academic achievement and performance on state education standards?
 - Student performances 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 a FLP

Transportation

Guidelines as set forth by the GaDOE will be used to determine transportation needs if any Vidalia City Schools are identified as needing an FLP.

Professional Learning

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

Schoolwide Plan Development Procedure

Three of the four schools (JD Dickerson Primary, Sally D. Meadows Elementary School and JR Trippe Middle School) with the Vidalia City Schools operate as Title I Schoolwide programs. The driving reason for this decision is to allow all children, especially the academic at-risk students, and all parents an opportunity to have



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equal access to all related Title I assistance. Every school year, schools evaluate their Title I schoolwide program to identify programs and services that were successful. During this time, schools meet with their parents, community stakeholders, and staff to revise and conduct a comprehensive needs assessment aligned to the most recent data (formal and informal).

The process to become a schoolwide school and the specific timelines for the schools are listed below.

Process 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

District Responsibility

- Submit Letter of Intent for each school
- Assist with writing the Schoolwide Plan
- 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 assessment in a language the parents can understand.
- 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 and annual evaluation of program effectiveness).



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- 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. This evaluation must determine whether the SWP was effective in increasing the achievement of students in meeting the 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 the LEA, parents, and the general public.

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 program checklist. School 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 shall notify stakeholders in multiple ways such as: notice of the meeting dates on the school marquee, school newsletters, websites, flyers, and school phone messaging system. Parents that cannot attend the meeting will be given the opportunity to obtain a copy from the school and submit input before the final revisions are approved. Each school will use the schoolwide program checklists to ensure that required components are included in each plan.

Scheduling Models for Schoolwide 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. (small group instruction, guided reading)

Pull-out Model

In a Title I pull-out delivery model, students are pulled from their regular classroom to receive remediation in reading and/or math. Students should not be out of their regular classroom’s reading or math instructional time for more than 25% of that time.

Elective Model



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Some middle schools use an elective course to supplement students' basic reading and math instruction.

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.

Targeted Assistance

Vidalia City School System currently has no Targeted Assistance Schools at this time. In the future if the district has a school that would require Targeted Assistance, guideline and procedures provided by the GaDOE will be implemented.

Section 6: Fiduciary Responsibility

Maintenance of Effort

MOE means the District must maintain its expenditures for public education from state and local funds from year to year. A district cannot reduce its own state and local spending for public education and replace those funds with federal funds.

For most federal programs for which MOE applies, such as Title I, Part A, the District's combined fiscal effort per student, or the aggregate expenditures of the District with the respect to the provision of a free public education for the fiscal year preceding the fiscal year for which the determination is made, must be not less than 90% of the combined fiscal effort or aggregate expenditures for the second fiscal year preceding the fiscal year for which the determination is made.

MOE is based on *actual* expenditures from State and local funds, not on budgeted funds. The District is responsible for maintaining effort and for documenting compliance with MOE.

GaDOE compares the fiscal effort of the preceding year to the second preceding fiscal year and makes the maintenance of effort determination, which is then available to the system through a marked "met" or "unmet" data field on the Consolidated Application. The Director of Federal Programs will pull the MOE information from the Consolidated Application for documentation purposes. Vidalia City School System consistently meets the MOE requirements.

Documentation for MOE is only required for districts that do not need the required maintenance of effort.



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Comparability of Services

Comparability is one indication that an LEA is using Title I funds to supplement and not supplant other funding sources. Meeting comparability means that the LEA provides services in the Title I schools that are at least comparable to services the LEA provides in the non-Title schools. Demonstrating comparability is a prerequisite for receiving Title I, Part A funds. Because Title I, Part A allocations is made annually, comparability is an annual requirement.

Comparability is done in the portal application online by pulling data from fall CPI and FTE reports.

1. Login to the GADOE Portal
2. Select the Title I Comparability
3. Select LEA Comparability Reporting
4. Complete all required LEA contact information
5. Select the Enrollment Size Tab, and then select the Does your System have small and Large Schools check box. Upon this selection, the application will automatically populate the smallest number of students in a school per grade, and likewise, the largest.
6. Select Run Comparability
7. Submit

Compliance Timeline

The district should collect the necessary data to demonstrate comparability as of the October FTE count day.	1 st week in November
Title I Comparability Report is automatically calculated within the Portal	November-December
If all schools in the district are not comparable as of the October FTE, revise report	No later than December 31 st of the current year

Who to include in Staff Count:

Core subject teachers, music teachers, art teachers, physical education teachers, instructional paraprofessionals, guidance counselors, speech therapists, media specialists, school social workers, and psychologists.

Who Not to Include:

Principals, assistant principals, custodians, cafeteria personnel, school nurses, security personnel, prekindergarten teachers, prekindergarten paraprofessionals, secretaries and non-instructional paraprofessionals.



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Allowability Procedures

Overview

At the beginning of the year, principals are provided professional learning on federal program procedures including: writing school wide plans; developing a budget; what expenses are allowable; and supplement not supplant. In addition to the formal training, the federal program director continually communicates with principals regarding their budgets. The principals and Director communicate via e-mail, telephone calls, and onsite visits as needed to answer any questions about the budget process and allowable expenditures. The Federal Program Director emphasizes to principals that all budget items must be included in the school wide plan and in the CLIP.

Budgets

The approval process for federal budgets is as follows:

- Funding amounts are approved by the GaDOE
- Award letters are sent to districts
- Schools are given the allocated dollar amount for budgeting and the Program Manager works with the school and district leadership team to develop the school level budgets
- The budget is entered into the GaDOE Consolidated Application by the program coordinator or authorized staff
- The budget is approved by the Assistant Superintendent of Teaching and Learning
- The budget is approved by the Superintendent
- 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 the GaDOE accounting department
- The budget is adopted by the district BOE
- The budget is entered into the financial accounting system PC Genesis

When determining how the district will spend grant funds, the originator of the purchase order, the program/grant manager of the various federal programs, in coordination with the finance department, will review the proposed cost to determine whether it is an allowable use of federal grant funds *before* obligating and spending those funds on the proposed goods or services. All expenditures made with federal funds must meet the standards outlined in EDGAR, 2 CFR Part 3474 and 2 CFR Part 200 and must have **prior approval** by the Federal Programs Director (all Title programs). The assigned program manager and fiscal staff, including the originator and any approvers of the purchase requisition order must consider the following factors when making an allowability determination.



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The Director of Federal Programs and Special Education Director receive budget status sheets every month from Finance Director. These are used to monitor expenditures and verify that the appropriate personnel are coded and paid from appropriate federal program budgets.

As appropriate and after a meeting held with principals to discuss budgeting and other program requirements, each Title I school prepares a school budget based on the allocation distributed. School Title I budgets are developed at the school level after the allocation is provided. Other federal budgets are prepared based their state/federal guidelines, to include support for Priority and Focus Schools. Budgets are developed around the needs of the school as determined through data analysis at each school. The District must also set aside funds for homeless students, parent involvement, and professional development. Schools are given a date to complete and submit the budget. They are provided guidance through meetings, phone calls, and e-mails. The structure for completing the budgeting process is made clear at the initial budget meeting with principals. The District, along with each school's administration submit the budgets, which are then reviewed for allowable costs by the Finance Director and Federal Programs Director and/or Special Education Director as applicable, which are reasonable and necessary to carry out the Title I school wide program and other federal programs. Once necessary revisions have been made the set asides and school budgets are compiled and placed in the consolidated application. Schools may not requisition items until they have been notified that the budget(s) has been approved at the state level. Once approval of the application has been made, schools are notified to spend Title budgets and provided a due date to complete purchases (exceptions typically include expenditures for parent involvement and professional learning). At this point, the school bookkeeper will request federal funds based on prior approval by Federal Program Director who is also the Title I Director via email and attached to purchase requisition unless Federal Program Director/Title I Director is the originator of the purchase requisition, and will route the purchase requisition to the Federal Programs Director for authorization who will route it to finance department for processing and Superintendent approval.

Determining Allowability of Cost

All costs must be allowable under the federal cost principles in 2 CFR Part 200, Subpart E, and under the terms and conditions of the specific federal award. Expenditures must be aligned with budgeted items in the approved grant application. Certain changes or variation from the approved budget and grant application need prior approval from the GaDOE.

In order to ensure that the district adheres to the guidelines expressed in 2CFR 200, the district uses the procedures below:

- The Director of Federal Programs provides guidance to principals regarding what is considered a necessary, reasonable, and **allocable** expense.
- Principals are reminded that their school data must drive their schoolwide plans and schoolwide plans must drive their budgets.
- Principals, with their leadership teams, analyze data and conduct needs assessments of their schools.
- The data that they collect are included in both the schools' schoolwide plans and the district's CLIP.



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- The CLIP and the schoolwide plans are submitted to the Director of Federal Programs. The Director and the Assistant Superintendent of Teaching and Learning review the plans; provide feedback to the principals (including needed revisions); and submit the completed plans to the department of education.
- After having approved plans, principals, with guidance from District office as needed, begin developing their Title I budgets.
- The Director of Federal Programs reviews the budgets to ensure that all budgeted items were also included in the CLIP and schoolwide plans and that the items meet federal guidelines.

Factors Affecting Allowability of Costs

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

√ **Necessary and Reasonable for the performance of the federal award.**

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

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

A good example to think about when considering whether it is reasonable or necessary is to equate it with purchasing a car. A basic economy car has everything you need to serve the purpose of transportation for which it was intended and would be considered reasonable and necessary. A top of the line car with blue tooth, heated seats, premium wheels, and window tinting may serve the purpose for which it was intended, but would not be considered reasonable as the same purpose could be met with the less expensive and more practical purchase of a basic economy car.

√ **Allocable to the federal award.** §200.405A cost is *allocable* to the federal award if the goods or services involved are *chargeable* or *assignable* to the federal award *in accordance with the relative benefits received*. This is done by:

- Making sure all request by schools meet the requirements of the federal program, is in the school improvement plan and paid out of the appropriate fund. If more than one fund is used, we make sure the good or service is used in proportion to the funds charged to the programs.
- Necessary to overall operation of the non-federal entity’s indirect (F&A) cost as it cannot be charged to another Federal award(s) to overcome fund deficiencies, avoid restrictions by Federal statutes, etc.



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- √ **Consistent with policies and procedures** to insure we are uniform when applying to both federal funds and other activities in the district.
- √ **Conform to any limitations or exclusions set forth as cost principles** in 2 CFR Part 200, Subpart E, or in the terms and conditions of the federal award.
- √ **Consistent treatment.** If a cost is assigned as a direct cost in one federal award, it cannot be assigned as an indirect cost if for the same purpose in another award.
- √ **Adequately documented.** All expenditures are properly documented with original source documentation that is clearly written and maintained on file electronically with accounting department. Documentation includes purchase orders/requisitions, invoices, receipts, verification of receipt of goods and services, travel authorizations and vouchers, contracts, time-and-effort records, copies of checks, bank statements, etc. Expenditures that are not supported by source documentation cannot be charged to the grant.
- √ **Follows (GAAP),** generally accepted accounting principles unless provided otherwise in 2 CFR Part 200.
- √ **Not included as a match or cost-share of another federal program,** unless the federal program allows it.
- √ **The net of all applicable credits.** This refers to those receipts or reduction of expenditures that operate to offset or reduce expense items allocable to the federal award (examples: purchase discounts; rebates or allowances; and adjustments of overpayments or erroneous charges, such as credits). If this occurs, the credits will be credited to the federal award. 2 CFR §200.406.

2 CFR Part 200's cost guidelines must be considered when federal grant funds are expended. Federal rules require state and district level requirements and policies regarding expenditures be followed as well. For example, state and/or district policies relating to travel or equipment may be more restrictive than the federal rules. In this case, the stricter state and/or district policies must be followed.

The program director ensures that all (Title I, Title II, Title III, Title IV, Title VI-B, Title IX and 21st CCLC) conform to any limitations or exclusions set forth in these principles or in the Federal award as to types or amount of cost items.

Requesting Prior Written Approval

Some costs discussed in the following sections and in the instructions to completing the grant application require *prior written approval* from the awarding agency. For GaDOE grants, prior approval must be requested in accordance with GaDOE's process. In addition, for certain costs for which it may be difficult to determine reasonableness or allocability, the district may seek *prior written approval* for "special or unusual costs" not identified in the regulations in advance of the incurrence of such costs. This may prevent future disallowance or



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dispute based on “unreasonableness” or “non-allocability.” Prior written approval should include the timeframe or scope of the agreement. 2CFR §200.407

The Program Manager and the Chief Financial Officer will determine if and when the district should seek prior written approval for a certain cost prior to incurring the cost. Federal grant funds will not be expended for any costs that require prior written approval in accordance with 2 CFR 200, Subpart E, or the grant application instructions, if such prior written approval was not properly secured.

Selected Items of Cost- 2 CFR Part 200, Subpart E

2 CFR Part 100, Subpart E, examines the allowability of 55 specific cost items (commonly referred to as *Selected Items of Cost*) as 2 CFR §200.420-.475. These cost items are listed in the chart below along with the citation where it is discussed.

We cannot assume that an item is allowable because it is specifically listed, as it may be *unallowable* despite its inclusion in the selected items of cost section, or it may be allowable only under certain conditions, including prior written approval.

The expenditure may be *unallowable* for a number of reasons, including: the express language of the regulation states the item is unallowable; the terms and conditions of the grant deem the item unallowable; or state/local restrictions dictate that the item is unallowable or allowable only under certain conditions or circumstances. The item may also be unallowable because it does not meet one of the factors affecting allowability of costs, such as being reasonable because it is considered too expensive. If an item is unallowable for any of these reasons, the district does not use federal funds to purchase it.

The selected items of cost address in 2 CFR Part 200, Subpart E include the following:

Item of Cost	Citation of Allowability Rule
Advertising and public relations costs	2 CFR §200.421
Advisory Councils	2 CFR §200.422
Alcoholic Beverages	2 CFR §200.423
Alumni/ activities	2 CFR §200.424
Audit services	2 CFR §200.425
Bad debt	2 CFR §200.426
Bonding costs	2 CFR §200.427
Collection of improper payments	2 CFR §200.428
Commencement and convocation costs	2 CFR §200.429
Compensation-personal services	2 CFR §200.430
Compensation-fringe benefits	2 CFR §200.431
Conferences	2 CFR §200.432
Contingency provisions	2 CFR §200.433
Contributions and donations	2 CFR §200.434
Defense and prosecution of criminal and civil proceedings, claims, appeals and	2 CFR §200.435



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patent infringements	
Depreciation	2 CFR §200.436
Employee health and welfare costs	2 CFR §200.437
Entertainment costs	2 CFR §200.438
Equipment and other capital expenditures	2 CFR §200.439
Exchange rates	2 CFR §200.440
Fines, penalties, damages and other settlements	2 CFR §200.441
Fund raising and investment management costs	2 CFR §200.442
Gains and losses on disposition of depreciable assets	2 CFR §200.443
General costs of government	2 CFR §200.444
Goods and services for personal use	2 CFR §200.445
Idle facilities and idle capacity	2 CFR §200.446
Insurance and indemnification	2 CFR §200.447
Intellectual property	2 CFR §200.448
Interest	2 CFR §200.449
Lobbying	2 CFR §200.450
Losses on other awards or contracts	2 CFR §200.451
Maintenance and repair costs	2 CFR §200.452
Materials and supplies costs, including costs of computing devices	2 CFR §200.453
Memberships, subscriptions, and professional activity costs	2 CFR §200.454
Organization costs	2 CFR §200.455
Participant support costs	2 CFR §200.456
Plant and security costs	2 CFR §200.457
Pre-award costs	2 CFR §200.458
Professional services costs	2 CFR §200.429
Proposal costs	2 CFR §200.460
Publication and printing costs	2 CFR §200.461
Rearrangement and reconversion costs	2 CFR §200.462
Recruiting costs	2 CFR §200.463
Relocation costs of employees	2 CFR §200.464
Rental costs of real property and equipment	2 CFR §200.465
Scholarships and student aid costs	2 CFR §200.466
Selling and marketing costs	2 CFR §200.467
Specialized service facilities	2 CFR §200.468
Student activity costs	2 CFR §200.469
Taxes (including Value Added Tax)	2 CFR §200.470
Termination costs	2 CFR §200.471
Training and education costs	2 CFR §200.472
Transportation costs	2 CFR §200.473
Travel costs	2 CFR §200.474
Trustees	2 CFR §200.475

Likewise, it is possible for the State and/or the District to put additional requirements on a specific item of cost. Under such circumstances, the stricter requirements must be met for a cost to be allowable. Accordingly, employees consult federal, State and District requirements when spending federal funds. For example, if the



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travel rules for grants administered by the VCSS are more restrictive than the federal cost principles allow, then VCSS policies must be followed.

In order for a cost to be allowable, the expenditure must also be allowable under the applicable *federal program statute* (e.g., Title I of the Elementary and Secondary Education Act [ESEA]) along with accompanying *program regulations, non-regulatory guidance, and grant award notifications*.

Most programs also contain the *supplement, not supplant* requirements. In general, this means that in order for federal funds to make a difference in supporting school reform in a schoolwide program, they must supplement those funds the schools would otherwise receive. To ensure that this occurs, a schoolwide program school relies on the equitable distribution of non-Federal funds. Under ESEA section 11149a) (2) (B):

- A schoolwide program school shall use federal funds (**Title I, Title II, Title III, Title IV, Title VI-B and Title IX**) only to supplement the amount of funds that would, in the absence of the Title funds mentioned above, be available from non-Federal sources for the school, including funds needed to provide services that are required by law for children with disabilities and English learners.

This requirement ensures that the Federal funds a schoolwide program school receives do not replace non-Federal funds the school would otherwise receive if it were not operating a schoolwide program. In other words, the supplement not supplant requirement for a schoolwide program is simply that the school receive all non-Federal funds it would receive if it did not receive federal (Title) funds. Federal grant and related grant programs are planned for supplemental activities are not allowed to supplant current funding. Our MOE report is one source of documentation for this requirement. In addition, during the Comprehensive Needs Assessment Process and the development of the District Improvement Plan and School Improvement Plans, this requirement is addressed. All requests for purchases are also reviewed by the Program Manager to ensure that all the items or services are supplemental in nature.

In summary, for a cost to be allowable under a federal grant program, the district ensures that it meets all of the following conditions. A cost that does not meet all of these conditions could be questioned during an audit or monitoring visit and could require repayment to the awarding agency. The cost must be:

- ✓ *reasonable* in cost (as described above)
- ✓ *necessary* to accomplish the objectives of the grant program (as described above)
- ✓ based on an identified need, concern, or area of weakness within the grant program
- ✓ appropriate under the authorizing program statute
- ✓ consistent with the underlying needs of the program in that it benefits the intended population of students or teachers for which the funds are appropriated
- ✓ *allocable* to the grant based on the relative benefits received (as described above)
- ✓ authorized or not prohibited under state or local law or regulations



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- ✓ consistent with policies, regulations, and procedures that apply to all activities, including other grants and state and local activities
- ✓ treated consistently as either *direct* or *indirect* cost
- ✓ determined in accordance with GAAP
- ✓ not used to meet cost sharing or matching requirements of another federal grant (unless specifically permitted in the other program statute or regulations)
- ✓ consistent with the terms and conditions of the grant award
- ✓ budgeted in the approved grant application
- ✓ adequately documented with appropriate supporting original source documentation
- ✓ the net of any applicable credits such as rebates or discounts
- ✓ allowable under the federal cost principles
- ✓ in most cases, supplemental to the core foundation program of the school and to other activities normally conducted by the school (i.e., supplement, not supplant)
- ✓ if the school is a Title I schoolwide program, the grant program's activities and applicable costs must be included in the schoolwide plan, the school must have conducted a comprehensive needs assessment, and the plan must contain the required components specified in statute (see Title I, Part A §1114[b]).

District personnel responsible for spending federal grant funds and for determining allowability must be familiar with the Part 200 selected items of cost section. District employees are required to follow these rules when charging these specific expenditures to a federal grant. In addition to checking the selected items of cost in Part 200, district staff must check costs against GaDOE's Guidelines Related to Specific Costs, local district policy, and any grant program restrictions to ensure the cost is allowable.

With each requisition/purchase order, Vidalia City School System has a built-in multiple approval process in the Soft Docs financial system that includes the program/grant manager and fiscal staff. Each approval level views the request for reasonable, necessary, allowable and allocable before approval is granted.

Costs That Require Special Attention

In addition to the aforementioned, certain types of costs may be allowable under federal law but may not be allowable under state law or guidelines, or may only be allowable under certain circumstances and conditions. GaDOE's General Guidelines for the Use of Title I Funds and Equipment outlines several other types of costs that require special attention due to the fact that some costs frequently cause audit exceptions or monitoring findings.

Vidalia City School System makes every effort to comply with these guidelines in the expenditures of federal grant funds to avoid audit exceptions. District employees engaged in federally funded activities are required to consult this document regularly and be familiar with its contents. When applicable, the program/grant manager will coordinate with the finance department before any expenses requiring special attention is expensed and will together consult the guideline related to specific costs.



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The state and/or district rules related to some specific costs items are discussed below. District employees must be aware of these State and District rules and ensure they are complying with these requirements.

Procurement, Technical Evaluation, and Selection Procedures

The Vidalia City Board of Education does hereby adopt the following policies and procedures for the purchase of items in the Vidalia City School System. All purchases shall be pursuant to the policies of the State Board of Education and the laws of the State of Georgia. Federal Grant Program guidelines will also be followed when spending federal dollars. All local written purchasing procedures will be followed including Wal-Mart, maintenance and transportation, transportation fuel and maintenance on buses, and technology orders. This will also include purchase order procedures. Contracts are not made with debarred contractors and are checked by the administrative assistant to the Federal Programs Director and reported before any contracts are agreed upon.

Vidalia City uses <https://www.sam.gov/portal/SAM/#1> to ensure:

- that any contracted services requested by administration and approved in the school improvement plan with any federal/state/local vendors has been checked against SAM to insure the potential contractor has not been debarred.
- A copy of the search will be kept on file by the administrative assistant to the Federal Programs Director in a file on Google Drive for review.

Vidalia City Board of Education requires a pre-Approved Purchase Order for all consultants, purchased services, and purchases. In the case of purchases, the purchase order serves as the contract between the district/school and vendor. Contracts are required for all consultants and purchased services. Agreements are entered between the Vidalia City School District and the consultant. Each contract must contain the following:

- Specific duties are specifically spelled out for each contract.
- If the consultant is working with students, they must have a criminal background check.
- The contract includes the scope of work, cost (not to exceed the agreed upon amount), and beginning and ending dates.
- The Federal Programs Director gives **prior approval** for all Title I-Part A, Title I-Part C, Title II-Part A, Title III-LEP (consortium currently), and Title VI-B RLIS contracts. The Special Education Director and Superintendent or Designee approves all IDEA contracts.

Each contract is signed by: The Federal Programs Director provides oversight in ensuring all federal programs contractors complete the work. Artifacts including sign in sheets, proof of workshop completion, invoices/contracts prior to issuance of payment of services which are signed/initialed by the Federal Programs Director. All contracts, source documents, and proof of fulfillment of contractual obligations are kept on file.

Employees shall engage in comparative buying and obtain bids and quotes whenever appropriate. Written specifications must be developed and formal sealed bids solicited and advertised in the local newspaper and appropriate website(s) on all equipment/supplies or services estimated to cost more than \$100,000. If equipment/supplies or services are estimated to cost at least \$50,000, but less than \$100,000, a formal sealed bid or a request for proposal must be prepared to obtain quotations. If equipment/supplies or services are estimated to



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cost at least \$5,000, but less than \$50,000, written or verbal quotations will be used. Purchase of item(s) with a total estimated value of \$5,000.00 or less shall not require quotes (an amount of \$3,500 or less for Federal Programs). However, these purchases shall be made with effort to provide the least expense to the system. The Federal Programs/Title I Director will obtain two quotes for purchases \$3,500 or greater for federal programs purchases unless only one vendor can provide the performance/ deliverables necessary to fulfill program activities.

Evidence of the quotations or bids will be furnished to the office of the Superintendent or his/her designee. All bids must be submitted in sealed envelopes, addressed to the Superintendent or his/her designee and plainly marked with the name of the bid, date and time specified. All bids shall be opened at the time specified, and all bidders will be contacted as to award of bid.

The Vidalia City Board of Education reserves the right to reject any or all bids, and to consider factors other than cost such as warranty, time required, quality of service or product or convenient access to the product or service. Previous unsatisfactory experience with a vendor may be cause for rejection. The intent is to select the best bid. The "best bid" may or may not be the lowest bid. The following requirements must be met in all instances in which formal, sealed bids are invited.

FORMAL SEALED BIDS (equipment/supplies or services in excess of \$100,000)

Written specifications are to be provided to the bidder.

Clear instructions are to be provided to all bidders in writing.

No changes are to be made to specifications or instructions verbally unless followed up with a written amendment to the original information to all known bidders.

In the instance a low bid is rejected and another accepted, a statement will be attached to the low bid documents specifying the reason or reasons the low bid was rejected.

After bids are opened, no employee of the Vidalia City Schools shall contact any vendor for the purpose of negotiating a better deal. The bidding process is to be considered complete when the bids are opened, however the Board and its employees reserve the right to request clarification of any item to which the vendor responds.

REQUESTS FOR PROPOSALS (equipment/supplies or services \$50,000 - \$100,000)

In instances where a request for proposal is required, a packet will be prepared for vendors. The information packet will include, at minimum, general information about the equipment, supplies, or service(s) required performance specifications, terms and conditions, and proposal instructions. The proposals will be submitted to the office of the Superintendent or his/her designee and will be evaluated on qualifications and cost.

WRITTEN VERBAL QUOTATIONS (equipment/supplies or services \$5,000 - \$50,000/ \$3,500-\$50,000 for Federal Programs)

If written or verbal quotations are used, personnel should attempt to obtain quotes from at least two different vendors for Title programs, if possible. Written or emailed quotations shall be kept on file for review by the Superintendent or his/her designee. If verbal quotations are used, personnel should keep a record of the address,



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phone number and representative of the vendor, the date and time of the conversation, and the amount of each quote.

EXCLUSIONS:

The following purchases, regardless of amount, may be purchased upon the approval of the Superintendent or designee(s).

-Items listed and priced in the current and active Federal Government Services Administration contracts, State of Georgia or other state government contracts, and other local government agency bid contracts may be purchased for the quoted price without public advertising and bidding. (This would apply to computer and printer purchases.)

- Equipment or services purchased through E-rate (Schools and Libraries program through USAC).

-Instructional, vehicular, equipment, and facility emergency needs which if not accomplished immediately (a) would result in health/safety hazards to students and/or school employees, (b) would result in additional damage, and/or (c) would cause interruption of the instructional program may be purchased with the approval of the Superintendent or his/her designee.

-Textbooks, library books, reference materials, subscriptions, computer programs, or other instructional media from the publisher, distributor, or agent and consumable instructional supplies may be purchased with Superintendent or his/her designee approval.

-Tests and test scoring services of a standard examination from the publisher or licensed agent may be purchased.

-Arrangements for maintenance service from the original vendor or authorized agent of the installed equipment or products if the same cannot be competitively bid may be purchased.

-Additional purchase of like equipment, material, supplies, services, rentals, or leases previously approved may be made provided the additional order is at the same or less price and is placed within the same fiscal year of the original bid.

-Workers Compensation and Risk Management Insurance claim payments made under existing legal, policy, or contract requirements.

-Noncompetitive proposals are allowed only in these circumstances: it is available from only one source, public demand or emergency requires it, written request by non-federal entity to the awarding agency or the number of competitive sources solicited is determined inadequate.

Consultants, Contracts, Purchased Services for Federal Funds

Contracts are required for all consultants and purchased services. Agreements are between Vidalia City School System and the consultant. Each contract shall contain the following:



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- Scope of work detailing specific deliverables (used to determine allowability)
- Itemization of costs and associated deliverables
- Timeline for completion
- Invoice including signature of appropriate authorizer.

The Superintendent or his/her designee will maintain oversight to ensure that contractors perform in accordance with the terms, conditions and specifications of their contracts or purchase orders. Documentation determining that the expenditure is allowable shall be maintained and kept on file. Payment will not be authorized until corresponding services are complete and documentation is verified.

Conflicts of Interest

Employees of the Vidalia City who are engaged in the selection, award and administration of contracts shall abide by the following:

- No employee, officer, or agent may participate in the selection, award, or administration of a contract supported by a Federal award if he or she has a real or apparent conflict of interest.
- Such a conflict of interest would arise when the employee, officer or agent, any member of his or her immediate family, his or her partner, or an organization which employs or is about to employ any of the parties indicated herein, has a financial or other interest in or a tangible personal benefit from a firm considered for a contract.
- Officers, employees and agents of the Vidalia City School System may neither solicit nor accept gratuities, favors, or anything of monetary value from contractors or parties to subcontracts.
- Violation of these standards will result in reporting of said personnel to the Superintendent of Schools and if appropriate, local authorities. Any misconduct could result in suspension, loss of employment and any other consequences that are applicable by law.

Travel

Travel costs are the expenses for transportation, lodging, meals and related items incurred by employees who are in travel status on official business of the Vidalia City School System.

The Vidalia City School System restricts reimbursements for travel paid from federal and state grants to rates that are specified in the State of Georgia Statewide Accounting Policy & Procedure Manual. The Vidalia City School System reimburses travelers for reasonable and necessary expenses incurred in connection with approved travel on its behalf. Employees of VCSS are encouraged to take advantage of State arranged travel discounts whenever possible.

A traveler's immediate supervisor or higher administrative authority must approve a travel expense report before reimbursement will be issued. The Federal Program Director must approve all travel expense forms submitted



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which will require federal funding. By approving travel expenses, the approver is attesting that he/she has thoroughly reviewed each transaction and the supporting documentation, and has verified that all transactions are allowable expenses. The approver is the “check” in the expense reporting process to identify potential or actual errors in expense reporting and is equally accountable for all expenditures. The approver role should be assigned to an individual who can judge the business appropriateness of each expenditure.

In general, reimbursement from state or federal grant for employees on travel is limited to the following:

- meals are reimbursable on a per diem basis for overnight official business outside traveler’s Primary Work Station
- reasonable lodging expenses are reimbursed at actual cost
- actual cost of most logical airfare
- actual mileage in a personal vehicle (if a fleet vehicle is unavailable or this is deemed the most efficient method of travel by the approving supervisor)
- cost of rental car and gasoline (if a fleet vehicle is unavailable or this is deemed the most efficient method of travel by the approving supervisor)

Additionally, costs incurred by employees for travel, including costs of lodging, other subsistence, and incidental expenses, must be deemed by the Vidalia City School System to be *reasonable* and otherwise allowable to the extent such costs does not exceed charges normally allowed by the district in its regular operations as the result of its written travel policy. Pursuant to the requirements in 2 CFR §200.474(b), documentation must be maintained that *justified* that (1) participation of the particular *individual* is *necessary* to the federal award; and (2) the costs are *reasonable* and *consistent* with the district’s established policy.

Per Diem & Mileage

Employees and Board members of the District are entitled to reimbursement of registration fees, mileage, per diem, and other costs associated with authorized trips for official school business.

❖ Travel Reimbursements (2210-558)

1. All travel requires pre-approval
2. An approved professional development request leave form and the conference agenda must be submitted with the expense form in Soft docs completely filled out with employee name, id#, date, departure/arrival date and time, odometer readings (if personal car is used), reason, any other pertinent fields.
3. For mileage rules please see the travel reimbursement form rules and regulations on the finance website.
4. Meals are reimbursed per current state guidelines and pre-populated (hardcoded) in the expense report filled out all employees online.



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5. Lodging- lodging expenses may be reimbursed. Receipts are **required**. When registering for lodging the **employee should claim exemption from the local hotel sales tax**. The appropriate form is available from the school or central office in paper form.

Travel Authorization

Employees who plan to travel must complete a *Professional Learning Leave Form* prior to travel, detailing the dates of the proposed travel, purpose of the travel and estimated travel expenses. The *Professional Learning Leave Form* must be approved by the employee's supervisor and by the Program Manager. The supervisor will verify that the travel by the particular individual is necessary to accomplish the objectives of the grant program. The Program Manager will verify that costs are reasonable and consistent with the district's travel policies. The Program Manager will also ensure that sufficient funds are budgeted and available for travel in the appropriate grant program prior to the employee incurring any travel expenditures.

The *Professional Learning Leave Form* must include the following at a minimum:

- Name of the individual that will be traveling
- Destination and purpose of the trip
- Dates of travel
- Tentative agenda
- Conference registration amounts
- Costs associated with travel (i.e. Sub, Expense, Registration)
- Signature and date of employee
- Signature and date of supervisor
- Signature and date of program manager

Upon return employees are required to complete a *Travel Reimbursement Request* and include the following at a minimum:

- Name of individual requesting reimbursement
- Employee ID #
- Headquarters location
- Travel Dates
- Mileage Readings (if claiming mileage & approved for mileage reimbursement)
- Purpose of travel
- Signature of employee
- Signature of supervisor
- Signature of program manager



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- The following documents must be attached to the form
 - Copy of the approved Professional Leave Form
 - Copy of the conference agenda with sessions highlighted (this will ensure the expense is allocable to the grant)
 - Any receipts for lodging, parking and other expenses incurred. Meal receipts are not required and are reimbursed upon State of Georgia guidelines.

Travel costs that are not supported by proper documentation as described above are not allowable to be charged to the grant and are subject to disallowance by state and federal auditors.

Professional Learning- Participants and Activities

Any staff wishing to participate in professional learning activities funded by federal funds must receive prior approval from the Director of Federal Programs. The following procedures will be followed to determine if the cost of the participant is allowable under a federal program:

- The Coordinator of Professional Learning will review PL activities and distribute information to schools based on system and school priorities. If the individual receives approval from the administrator, the approved PL form, tentative agenda and registration form will be submitted to the Coordinator. The Director of Federal Programs will review all packets to ensure that the individual and the activity is an allowable expenditure.
 - For Title I programs, the activity must be included in the SIP and budget and the individual must be of a core content area.
 - For Title II programs, the activity must be aligned with the system and/or school needs and the activity must improve the knowledge of teachers, principals, paraprofessionals and academic specialists (when appropriate) concerning--
 - one or more of the core academic subjects that the teachers teach; and
 - effective instructional strategies, methods, and skills, and use of challenging State academic content standards and student academic achievement standards, and State assessments, to improve teaching practices and student academic achievement; and
 - that improve the knowledge of teachers and principals and, in appropriate cases, paraprofessionals and academic specialists, concerning effective instructional practices and that—
 - involve collaborative groups of teachers and administrators;
 - provide training in how to teach and address the needs of students with different learning styles, particularly students with disabilities, students with special learning needs, and students with limited English proficiency;
 - provide training in methods of—
 - improving student behavior in the classroom



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- provide training to enable teachers and principals to involve parents in their child's education, especially parents of limited English proficient and immigrant children; and
- provide training on how to understand and use data and assessments to improve classroom practice and student learning.

If the agenda, PL form, and registration support the funding federal award the Director of Federal Programs will approve the professional learning activity to be funded out of the appropriate fund.

Conferences

Vidalia City School System will exercise discretion and judgment when authorizing expenditures related to conferences to ensure costs are appropriate, necessary and managed in a manner that minimizes costs to the federal award. When submitting reimbursement requests the Director of Federal Programs will review the agenda to ensure the sessions attended are allowable under the funding program. If they are not, reimbursements will be pro-rated with proper funding codes. Reimbursement expenses for costs associated with meals and hotels will follow the district travel policy.

Advertising and Public Relations Costs

Pursuant to the requirements in 2 CFR §200.421, the costs of *advertising* are allowable only for the recruitment of grant personnel; the procurement of goods and services for the award; disposal of scrap or surplus materials acquired under the award; and program outreach. Allowable *public relations* costs are those necessary to communicate with the public and press pertaining to specific activities or accomplishments or as necessary to keep the public informed on matters of public concern. All advertising and public relations costs must be necessary for the performance of the particular award, and must not be for the purpose of advertising or relating to the public with regard to the district in general.

Hosting Meetings and Conferences

2 CFR §200.432 discusses the allowability of conference costs paid by the district as a sponsor or host of the conference. A conference is defined as a meeting, retreat, seminar, symposium, workshop or event whose purpose is the dissemination of technical information beyond the non-Federal entity and is necessary and reasonable for successful performance under the Federal award. These federal guidelines state that costs may include rental of facilities, cost of meals and refreshments, local transportation, and other items incidental to such conferences unless further restricted by the terms and conditions of the Federal award. Per the guidance, conference hosts/sponsors must exercise discretion and judgment in ensuring that conference costs are appropriate, necessary, and managed in a manner that minimizes the costs to the Federal award. However, the USDE issued more restrictive guidance related to the use of funds for conferences and meetings, particularly with regard to food costs such as meals, snacks, and refreshments.

Per guidance from the USDE:

“Generally, there is a very high burden of proof to show that paying for food and beverages with Federal funds is necessary to meet the goals and objectives of a Federal grant. When a grantee is hosting a meeting,



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the grantee should structure the agenda for the meeting so that there is time for participants to purchase their own food, beverages, and snacks. In addition, when planning a meeting, grantees may want to consider a location in which participants have easy access to food and beverages.

While these determinations will be made on a case-by-case basis, and there may be some circumstances where the cost would be permissible, it is likely that those circumstances will be rare. Grantees, therefore, will have to make a compelling case that the unique circumstances they have identified would justify these costs as reasonable and necessary.”

Additionally, the USDE guidance states that grantees should consider whether a face-to-face meeting or conference is the most effective or efficient way to achieve the desired result and whether there are alternatives such as webinars or video conferences, that would be equally or similarly effective and more efficient in terms of time and costs than a face-to-face meeting.

District staff will adhere to these guidelines if and when hosting a meeting or conference for non-employees. Prior to planning a meeting or conference, approval will be obtained from the grant Program Manager. If necessary or required, the proposed meeting or conference will be budgeted in the approved application.

Memberships, subscriptions, and professional activity costs

VCSS will follow procedures as outlined in UAR 200.454 to ensure compliance with governing laws and regulations. Memberships are paid out of federal funds. If subscriptions are approved to be funded out of federal programs, the subscription period will only be for the period of the grant award. All subscriptions will be included in the SIP and/or district plan and the budget prior to purchasing.

Supplement not Supplant

Federal Program funds are supplemental to schools' budgets. Personnel are in addition to the number required to meet maximum class size 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 Programs funds are not used to take the place (supplant) of local, state, or other federal funding and are not provided to participating Title I children when the same services are provided to non- Title I children with non-federal funds. Conversations regarding supplement vs. supplant are held quite often throughout the year. The programs, activities, and materials are supplemental to what is required by federal, state, and local law. Title I funds do not support programs that were paid with state or local funds unless there has been evidence of precipitous decline. All school administrators are made aware of the supplement not supplant issue during the training that takes place during the summer months before school starts. Principals must electronically approve all requisitions before it is sent to the Director of Federal Programs to approve electronically. The Director of Federal Programs reviews all requisitions and if approves for purchase converts them to a purchase order and submits to the vendor.



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In order for Federal funds to make a difference in supporting school reform in a schoolwide program, they must supplement those funds the school would otherwise receive. To ensure that this occurs, a schoolwide program school relies on the equitable distribution of non-Federal funds. Under ESEA section 1114(a) (2) (B):

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

Internal Controls

Internal controls are defined as “a process effective by an entity’s oversight body, management, and other personnel that provide reasonable assurance that the objectives of the entity will be achieved.” The internal controls are the policies and procedures used to ensure that the organization’s mission, strategic plan, goals and objectives are achieved.

The objectives and corresponding risks fall into one or more of the following categories:

- **Operations:** Effectiveness and efficiency of operations
- **Reporting:** Reliability of financial reporting both internally and externally
- **Compliance:** Compliance with applicable laws and regulations

Internal control consists of five interrelated components as follows:

- Control environment
- Risk assessment
- Control activities
- Information and communication
- Monitoring

All five internal control components must be present to have effective internal controls.

General

The Vidalia City School System has established procedures to maintain internal control over all assets. The purpose of establishing internal controls is to provide a reasonable assurance that the District will accomplish its objectives of safeguarding assets, providing reliable financial information, promoting operational efficiency and ensuring compliance with laws, regulations, and established district policies and procedures.

Control Framework

The District has implemented an internal control system and framework based on its internal and external needs. It is the policy of the district to ensure that its control framework provides for strong administrative governance. The district’s internal control system is a relevant evaluation tool for internal control over financial reporting.



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Ethics Statement

Vidalia City School System makes every effort to set an honest and ethical tone for the district that is demonstrated at every level. The district operations reflect the overall attitude, awareness and actions of the school board, management and others concerning the importance of how the district views internal control and the management of these controls.

Communication and Training

The Vidalia City School System makes every effort to maintain communication with all employees regarding the policies and procedures of the district including, but not limited to periodic training for personnel, both at school sites and central office, regular meeting of the school board. The District's Board Policies and meeting agendas are maintained on the District web site along with information necessary to the requirements for safekeeping of various assets and transparency of financial operations for both employees and taxpayers. Supervisory hierarchies are maintained to insure proper approvals and processes are in place.

Personnel

The recruitment of competent, honest individuals is administered through the services of the principals and the Superintendent. The training of staff regarding the established policies and procedures governing all financial transactions is administered through the Finance office.

- **Segregation of Duties.** The assignment of duties to staff members who have access to the Financial Management System is done with the intent of limiting their ability to cause and conceal errors or irregularities. Working within certain limitations, including staff size, incompatible functions are not assigned to any staff member. Details of incompatible staff assignments are specifically addressed for focal points, such as accounts payable and receiving, or posting cash receipts and reconciling the bank accounts. Continued monitoring and oversight must take place daily to ensure secure business operations.
- **Transaction Authorization.** The budget is allocated to each school site and program area and the authorization or expending of funds is assigned to the principal and/or program manager for monitoring. The individual school principal or appropriate program director is responsible for his/her budget and for assuring that each request is appropriate and necessary.
- **Transaction Recording.** Transactions are recorded at the time of authorization resulting in the encumbrance of the budget. The Finance office staff is responsible for verifying the amounts, the classification to the appropriate account codes, and the proper authorization of all transactions prior to posting in the Financial Management System. All source documents (check warrants, etc.) used to record transactions are official District forms and are sequentially numbered by the accounting system for



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accountability. All voided check warrants are marked VOID and kept on file for the auditor's review. All voided Purchase Orders are marked VOID and are reflected in the Financial Management System.

- **Safekeeping Assets.** The access to assets is limited by assigning primary custodians for the assets at each school or department (including the central office) location.
- **Record Reconciliation.** The Finance Department administers the comparison of actual general fixed assets on hand with the amounts recorded in the Financial Management System. Monthly reconciliation of bank statements, fixed asset records, and other financial records are prepared and verified during the monthly closing process. **The Federal Program Director will receive monthly Summary of Activity Reports, which are sequenced by account, to reconcile federal programs.** All discrepancies found during the reconciliation process are researched and corrected at the time they are detected. These closeout procedures are administered as a joint effort by the finance office staff. The fixed asset listing is maintained and reconciled to the general ledger by the Financial Director.

Risk Assessment

The Vidalia City School System analyzes all processes and applies a Risk Assessment tool to determine inherent risks in each of its accounting processes. Emphasis is on communication to ensure that each employee is aware of necessary processes to meet certain objectives. The district disseminates information to key personnel to ensure that employees involved with the acquisition and disposal of assets are thoroughly trained and informed of proper procedures. At the same time, the district must weigh the costs of certain requirements to make sure that the benefits derived do not outweigh the cost of implementing, maintaining and monitoring the system.

Control Activities

Budget The Vidalia City School System prepares and adopts an annual budget in accordance with Georgia Statutory requirements. The operating budget is prepared under the supervision of the Superintendent by the Chief Financial Officer with input from school principals and Grant Directors. Each school has a governance council, comprised of various stakeholders including but not limited to parents, teachers, and business/community leaders. These councils review and make recommendations regarding budgetary issues, including site-based allocations and staffing. School principals report out from school governance committee to the Superintendent and Chief Financial Officer regarding all staffing and compare all positions to student class loads. These committees at each school are designed to ensure representation from instructional, program, parent and administrative perspectives. The school principals also submit requests for operations (supplies, books, etc.) to Finance Director based upon individual school needs and share those needs with the council. The Chief Financial Officer and the Superintendent of Schools review these decisions before being finalized by the local board of education.



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Final Cash Balances

Upon completion of the final close of each fiscal year, the district determines the actual cash balances for all funds and reports them to the GaDOE by the designated deadline.

Budget Maintenance

The budget ledgers are maintained in the Finance Office using the financial management system used in concert with the cash balance and encumbrances to ensure that all spending is in accordance with budget authority, while budget object lines may be temporarily overspent, budget functions may not be overspent

All operating budget increases, decreases, and adjustments to the operating budget are presented to the local Board of Education for approval and then submitted to the GaDOE for approval. Budget adjustments, which do not alter the total amount of the budget, are processed as follows:

- School level transfer are completed at the school level and **forwarded to the program manager/director of funds to approve the request.** Once approved the transfer is completed by the finance department and the school site is notified that funds have been transferred.

Payroll

The Finance Director under the supervision of Superintendent is responsible for monitoring the hiring of personnel, authorizing salaries, initiating employment contracts, and maintaining the staffing levels approved in the annual budget. The Chief Financial Officer verifies that budget is available for any staffing increases. The human resource paperwork containing employment information (training and experience, fund to be paid from, and school information) is submitted to the payroll officer for new or replacement personnel by the human resources department. The payroll officer verifies the data supplied by the HR department with the information entered into the financial management system. Federal Programs Director supplies Payroll department a list of employees eligible for Federal funding under each of the grants and coordinates with Financial Director to establish appropriate percentages of pay for each teacher. Teachers' salaries are coded according to the state chart of accounts for each grant. All payrolls are processed from the approved employment contracts. All additional payrolls are processed by exception and only with proper authorization from the Superintendent or Chief Financial Officer. These payroll payments can include substitutes, increments, Saturday school, and/or additional services such as tutoring and summer school.

Sick Leave

All Vidalia City employees must call or go online to Source for Teachers and submit a leave approval form and notify the building secretary. The Federal Programs Director will supply the principals with a list of teachers and percentages paid out of Title funds once the budget is approved. Source 4 Teachers automatically codes teachers and percentages given approval by Federal Programs Director and Financial Director. Principal will print our monthly attendance report for those paid with federal funds and send to



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Federal Programs Director to cross reference with Payroll Specialist to insure accuracy in expending of federal funds.

Other types of leave:

Other types of leave which require prior approval must be submitted on a “Professional Leave Request Activity” form and signed by the building principal or supervisor through soft docs and then routed to appropriate personnel at district level for approval. For those who are federally funded, an email from the person requesting “other” leave must be sent to Federal Programs Director first with activity, any correspondence or paperwork they received (example: invite to conference, training, etc.) and attach it to the email for approval. Once reviewed, if approved, notification of approval will be sent back to the person and then a professional leave request form can be completed and approval from the director attached to the soft docs form.

NOTE: Source 4 Teachers contract is approved by the Board of Education and all substitutes are outsourced by the Vidalia Board of Education. The contract is signed by the Superintendent on behalf of the Board. A list of all teachers and percent they are working under a Federal Program is shared with the Financial Director and the Financial Director assigns proper percentages to the federal program based on authorization by the Federal Program Director for staff. This is sent and used by Source 4 Teachers charging funds. Documentation in the form of an online trail of personnel, percentages and authorization of payment through an ACH is pulled monthly for review by Federal Programs Director.

Purchasing

The Chief Financial Officer is responsible for assuring that all purchases against the assigned budgets are appropriate and necessary. The school bookkeeper, under the direction of the principal, at each site primarily initiates the purchasing process. The request for purchase orders requisitions is the initial electronic document submitted to the Finance Department and once approved by all applicable program managers/directors the document is assigned a purchase order number from the Financial Management System and the amount is encumbered into the general ledger.

❖ Purchases and Requisition Process for Federal Programs:

The Director of Federal Programs will ensure that all Title I, Title II, A, Title III, Homeless and N&D are reviewed and approved prior to purchases. The Director of Federal Programs will meet with all principals at the beginning of the year to review guidelines for purchases and distribute the district’s Federal Programs Handbook that includes written details of the purchasing procedures. The process for purchasing is as follows:



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Routine Purchases

The Director of Federal Programs will execute the majority of purchases by submission of an electronic purchase requisition and all proper documentation.

1. The Director of Federal Programs and other district leadership team members review each school budget.
2. The Principal or his/her designee submits a requisition in the accounting system Soft docs. This requisition requires specific account codes in order to properly assign expense.
3. The program director will verify that an account code with specific identifiers is assigned. Then the requisition must go through the approval level (building principal, CFO, Director of Federal Programs and then the Superintendent has final approval.
4. Once the requisition has been reviewed and approved it is converted to a Purchase Order.
5. Purchase Order is emailed to the originator.
6. The requisition originator receives an electronic file to keep at the school and submits it to the vendor.
7. When the merchandise arrives, the school or department then electronically receives the merchandise in Soft docs via AP approval form so that the invoice can be processed.

The Director of Federal Programs reviews all submitted documentation with the purchase request and approves the expenditure if:

- It's an allowable expense
- It's in the school's Title I Schoolwide Plan, supports the District's Strategic Action Plan, and CLIP
- If the purchase is supplemental to the funds the school would otherwise receive
- It's reasonable and necessary

Accounts Payable

All vendor invoices are submitted to the Accounts Payable personnel in the Finance Department. The vendor invoice is matched to the accounting copy of the purchase order in Soft Docs vial the AP approval form. Once the documents are matched, the items invoiced are checked back to the items listed on the approved copies of the purchase order. Accounts Payable personnel check each invoice carefully to verify amounts due, shipping and handling costs, applicable discounts, and taxes. The Accounts Payable personnel can only pay the invoice if there are receiving records in the Financial Management System.

The AP Specialist generates an open payables report from PC GENESIS with the vendor information, invoice information and amount due. These reports are verified for accuracy before the checks are printed. A signature



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with the name of the Board Treasurer and Assistant Treasurer then encodes the checks. A listing of all checks written is created from PC GENESIS and is reviewed by the Board Treasurer and Assistant Treasurer.

Bank Reconciliations

All bank accounts are reconciled on a monthly basis. The Chief Financial Officer approved the bank reconciliations and approves any adjustments necessary to the general ledger. The CFO cancels all checks as the checks clear the bank (as indicated on each bank statement) in the financial management system bank reconciliation software and locates any discrepancies in the balances, and makes any journal entries necessary for correction. The monthly registers, transaction journals, and general ledgers are generated monthly and are stored in the Finance Office and may be accessed for review by the Superintendent and other interested parties. As a compensating control, two signatures are required on bank reconciliations and any correcting journal entries.

Recruitment

If it is necessary to fund recruitment costs from federal funds VCSS will follow the guidelines as outlined by EDGAR and the Title II, A handbook. Allowable recruitment costs include:

- “Help Wanted” advertising allowable by Title II, Part A
- Travel associated with recruitment
- The procurement of goods and services for Title II, Part A
- Incentive bonuses for fully certifiable personnel in areas of need as notated in the Equity Plan and CLIP.

All expenditures relating to recruitment that will be funded out of federal programs will be pre-approved by the Director of Federal Programs. In accordance with 200.421 (e) (2) (i) & (3), **unallowable** advertising and public relations costs include: costs of displays and exhibits and costs of promotional items and memorabilia, including gifts and souvenirs.

In the event VCSS experiences difficulty recruiting and retaining Professional Qualified and highly effective core academic content teachers a financial incentive may be funded by federal funds. If this option is chosen, VCSS will document 1) the need for the expenditure 2) the criteria for selection and 3) the rationale for the amount awarded.

Professional Learning Stipends

1. The request for Stipend must be included as part of the school improvement plan and or/ district plan
2. Stipend Request forms must be completed and submitted to the Director of Federal Programs if the stipend is being funded from a federal program
3. Upon completion of the professional development activity the following must be attached to the Request for Stipend:
 - a. Agenda



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b. Sign-in Sheet

4. Procedures for granting stipends shall be consistent with federal and nonfederal funds and compliant with the State Board Rule. Any stipends paid from federal funds will follow the guidelines as set by the Chief Financial Officer for nonfederal stipends.

Split-Funded Personnel

Split-funded personnel are required to maintain a time log with specific Federal Programs and non-Federal Programs duties. The format used is the time log form found on the GaDOE website.

The immediate supervisor of the staff member signs forms monthly. The split time log is filled out after the end of each month and submitted to the immediate supervisor for review and signature. Supporting source documentation is attached to the time log. This source documentation could include calendar entries, schedules, etc. Signed forms are maintained in the Federal Programs office.

Periodic Certification

Periodic certification for all federally funded staff takes place after-the-fact. The process takes place twice yearly. The first one for the year takes place after January 1 and the second periodic certification takes place at the end of the school year. All substitutes, bus drivers, child-care (for parental involvement activities), and stipends will also be required to have a semi-annual certification completed. The Federal Programs Director sends each administrator a group of Periodic Certification form to be completed after January 1 and after the last day of school. Monthly payroll reports are compared to absence reports and Professional Learning Leave Forms by the Director of Federal Programs to compile the list of individuals who are listed on the periodic certification forms.

Equipment and Real Property

Inventory

The designee selected by the principal maintains inventory at the school level. Inventory is documented in a database that is updated each time equipment is purchased. All equipment purchased with federal funds is identified by a decal on the equipment. The database includes a description of the item, serial number, decal number, vendor name, purchase order number, fiscal year, funding source, purchase cost, location, and current condition. School personnel must annually verify the location and condition of the equipment. Each item must be checked on the inventory record specifically for condition and location. Principals, media specialists, and academic specialists attest that the equipment is as identified on the inventory record submitted to the Director of Federal Programs. When a piece of equipment needs to be disposed of, disposal forms are completed and kept of file. Disposal occurs according to the Vidalia City School System disposal procedures. The Director of Federal Programs will conduct onsite monitoring of inventory throughout the year.



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Use of Equipment

Each school receives the *Title I, Part A Inventory Review Guidelines* provided by the Department of Education and the information provided within the document is also discussed at inventory trainings and principal meetings.

Use of Title I Equipment in Targeted Assistance Schools

Vidalia City School System currently does not have any Targeted Assistance schools. In the future, if need arises, procedures as outlined by the GaDOE will be implemented.

Method of Documenting Use in Building

Any equipment purchased with federal funds must be reasonable and necessary to implement a properly designed program for participants. 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.”

It is the local school’s responsibility to ensure and document that Title I students are using equipment, or any other item purchased with Title I funds the vast majority of the time. The Title I guidance refers to a 90-10 rule suggesting that Title I students should be using Title I purchased items 90% of the time. 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. If equipment is split funded the percentage used out of each program must align with percent allocated.

All schools are required to label all equipment purchased with federal funds. When feasible, all Title I equipment is to remain in the Title I classrooms. All Title I equipment placed in the media center must be kept in a separate area, labeled, and a checkout ledger must be maintained. All equipment purchased with federal funds is inventoried at least annually by Federal Programs Director and Title I Monitoring Form completed (see form in appendix). Once completed, this report is filed in the Federal Programs Office and Office of Technology.

Vidalia City Schools Equipment Disposition Procedure

Technology Equipment Disposal:

When original or replacement equipment acquired with federal funds is no longer needed for the original project or program, the equipment may be retained, sold or disposed, if it is not needed in any other Title I, Part A like or federally funded project or program. The school will need to ensure that records are kept and made available for monitors and auditors as to where the equipment was transferred.



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The following are procedures to eliminate any equipment item from inventory:

1. Equipment items with an acquisition cost/current per unit fair market (an explanation is provided in the Definitions section) value of **less than \$5,000** and are **more than three years old** may be retained, sold or disposed, with no further obligation to the Department. The disposition of such items should be so noted on the equipment inventory maintained by the LEA.
2. Equipment items with an acquisition cost of **\$5,000 or more** may be retained or sold and the awarding agency (Department) shall have a right to amount calculated by multiplying the current market value or proceeds from sale by the awarding agency (Department's) share of the equipment.
 - a. If the current per unit fair market value is \$5,000 or more, the equipment may be retained or sold and the awarding agency (Department) shall have a right to an amount calculated by multiplying the current market value or proceeds from the sale by the state's share of the equipment. However, the entity is permitted to deduct and retain from the state's share \$500 or 10-percent of the sales proceeds, whichever is less, for the entity's selling and handling expenses. Note: The Department does not require this of Georgia's Title I LEAs. To date, the Department has not required this action of LEAs for the sale of Title I property in a district. However, this procedure is outlined in EDGAR §80.32 Equipment (4) (e) and allows a state to require this process from their LEAs.
 - b. The disposition of such items should be so noted on the equipment inventory maintained by the recipient. The recipient should include the date of disposal and sales price or the method used to determine current fair market value if the recipient compensates the state.

Lost or Stolen Equipment

In the even equipment is misplaced it is the schools responsibility to replace the equipment. If it was stolen the following procedures should be followed.

1. File an incident report with the central office and authorities (if deemed necessary).
2. Attach the incident report to the Disposal Form and send to the Director of Federal Programs.
3. Make corrections to the Federal Programs Inventory.
4. Send the updated inventory to the Federal Programs Office.

Cash Management

PROCEDURES FOR CASH DRAWDOWNS

The Finance Department is responsible for all cash and cash flow management. Drawdowns are done monthly if possible and necessary. The finance department is very careful to draw down funds based on actual expenditure needs. The following steps are followed for federal drawdowns:



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Submission of Expenditure Reports:

The following steps are conducted in submitting /expenditure reports:

1. Drawdowns are made as needed based on expenditures.
2. An expenditure detail report and Summary of Activity, sequenced by account, is printed according to program codes.
3. All reports are reviewed by the Chief Financial Officer and submitted electronically to GAORS
4. All drawdown reports are kept on file and a copy along with a detailed expenditure report given to each program director for their records.
5. All funds received are posted to the cash receipts journal.

Drawdown Procedure:

A year to date budget report for all grants including all federal funds is printed and the accountant in the Finance department prepares the DE 0147 Request for Reimbursement of disbursements as drawdowns are requested. The requests are then reviewed and approved by the Federal Programs Director. A federal drawdown acknowledgement form is signed by the Director and filed with the DEO147 in the finance office **by each program director** as a copy of all reports are kept and filed.

Reporting Procedures

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

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

The Director of Federal Programs will run budget summary and detailed expenditure reports periodically as part of the ongoing monitoring process.

Complaint Procedures

Vidalia City Schools is committed to open communication with all schools in order to reach the goal of educating all students. The following procedures have been developed to handle complaints dealing with federal programs, services, and staff members. All federal complaints are to be directed to the Director of Federal Programs using the procedures outlined below.



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A. Grounds for a Complaint

Any individual, organization or agency (“complainant”) may file a complaint with the Vidalia City School District Board of Education if that individual, organization, or agency believes and alleges that a violation of Federal statute or regulation that applies to the a program under the No Child Left Behind Act has occurred. The complaint must allege a violation that occurred not more than (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.

B. 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 IX, Part E, Subpart 1, Section 9503: Complaint Process for Participation of Private School Children
9. Title X, Part C- McKinney Vento Homeless Assistance Act
10. School Improvement Grant (1003a)

C. Filing a Complaint

A complaint must be made in writing to the Vidalia City School Superintendent or his/her designee and signed by the complainant. The complaint must include the following:

1. A statement that the Vidalia City School System has violated a requirement of a Federal statute or regulation that applies to an applicable program;
2. The date on which the violation occurred;
3. The facts on which the statement is based and the specific requirement allegedly violated (include citation to the Federal statute or regulation)
4. A list of the names and telephone numbers of individuals who can provide additional information;
5. Copies of all applicable documents supporting the complainant’s position; and
6. The address of the complainant.

D. 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:

1. The date the Vidalia City School System received the complaint;
2. How the complainant may provide additional information;
3. A statement of the ways in which the Vidalia City School System may investigate or address the complaint; and



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4. Any other pertinent information.

If any other 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 Letter of Findings indicates that a violation has been found, corrective action will be required and timelines for completion will be included. The sixty (60) day timeline outlined above may be extended, if exceptional circumstances exist. The Letter of Findings will be sent directly to the complainant.

E. Right of Appeal

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

The complaint must be addressed to:

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



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Vidalia City Schools
Complaint Form for Federal Programs

Please Print

Name of (Complainant):	
Mailing Address:	
Phone Number (home):	Phone Number (work):
Person/department complaint is being filed against:	
Date on which violation occurred:	
Statement that the Vidalia City School System has violated a requirement of a Federal statute or regulation that applies to an applicable program (include citation to the Federal statute or regulation)(attach additional sheets if necessary):	
The facts on which the statement is based and the specific requirement allegedly violated (attach additional sheets if necessary):	
List the name and telephone numbers of individuals who can provide additional information	
Attach/enclose copies of all applicable documents supporting your position	
Signature of Complainant:	Date:
Mail or deliver this form to: Federal Programs Director Vidalia City School System 200 Bradwell Street Hinesville, GA 31313	
-----For office use only-----	
Date Received in Title I Office _____	
Date of Contact _____	Date Resolved _____
Resolution: _____ _____	
Signature of Federal Programs Director or Superintendent _____	



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Ethics and Fraud, Waste and Abuse

At the beginning of each school year school administration or a member of PAGE reviews the Code of Ethics for Educators with each school. Agendas and sign-in sheets will be kept by the Federal Programs Director to document that these training sessions have been completed. Each administrator will also receive a copy of the Fraud, Waste, and Abuse policy in the Federal Programs Handbook at the beginning of each school year. Handbook acknowledgement forms will be filed in the Federal Programs department to document the acceptance of the handbook.

1. Once the Code of Ethics and Fraud, Waste and Abuse policies has been discussed at the school site the principals will submit agendas and sign-in sheets to the Federal Programs Director to verify the policies have been reviewed with all staff.
2. Central office directors will review the same information with staff members that are not located in a school facility. Each director will submit agendas and sign-in sheets to the Federal Programs Director to verify the policies have been reviewed with all staff.
3. The “Ethics, Waste, Fraud, and Abuse” policies will be posted on the system website for all employees, stakeholders, vendors, and community members to access.

Administrative Regulation Reporting Suspicion of Fraudulent Activities

Purpose: To ensure the reporting of suspicious fraudulent activity, the Vidalia City School System provides employees, clients, vendors, and individuals with confidential channels to report these activities.

Definitions: **Fraud** is a false representation of a matter of fact, whether by words, by conduct, or by concealment of that which should have been disclosed, that is used for the purpose of misappropriating property and/or monetary funds from local, state, or federal grants and funds. **Waste** is the intentional or unintentional, thoughtless or careless expenditure, consumption, mismanagement, use, or squandering of local, state, federal resources to 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 the excessive or improper use of a thing, policy or procedure, or to employ something in a manner contrary to the natural or legal rules for its use. It is also the intentional destruction, diversion, manipulation, misapplication, maltreatment or misuse of resources. Abuse can also occur through the extravagant or excessive use of one’s position or authority. Abuse can occur in financial or non-financial settings.

Statement of Administrative Regulations:



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The Vidalia City School System thoroughly and expeditiously investigates any reported cases of suspected fraud, waste, or abuse to determine if disciplinary, financial recovery and/or criminal action should be taken.

Confidentiality:

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

Procedures and Responsibilities:

1. Anyone suspecting fraud, waste or abuse activity should report their concern to the Vidalia City School System School Superintendent or designee at 912-876-2161.
2. Any employee with the Vidalia City School System who receives a report of suspected fraudulent activity must report the information within the next business day.
3. Employees have the responsibility to report suspected fraud. All reports can be made in confidence.
4. The Vidalia City School System shall conduct investigations of employees, providers, contractors, or vendors.
5. If necessary, the person reporting will be contacted for additional information.
6. Periodic communication through meetings should emphasize the responsibilities and procedures to report suspected fraud.

Examples of Fraud, Waste, and Abuse

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



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Assessment Security

Vidalia City School System Testing Plan 2017-2018

System Testing Coordinator: Lucy Claroni

The Vidalia City School System conducts the assessment program as required by federal and state law. It is in compliance with the Georgia law relative to student assessment and data reporting. Vidalia City School System interacts with state and federal agencies relative to the assessment program and accountability mandates. The testing department handles assessment documents and reports including secure test materials, individual student score reports, and school/district data reports in both paper and electronic formats. Vidalia City School System delivers training/guidance related to the assessment program, assessment data, and accountability to all stakeholders.

Training Plan:

I. Materials

- a. All school testing coordinators must have a sign in sheet for documentation of teacher and proctor participation.
- b. GaDOE Update on each testing being administered will be provided as a reference/resource for school testing coordinators.
- c. A District update is provided to school testing coordinators to indicate any special requirements from the district.
- d. School Coordinators Manual and Examiner's Manual will be used to assist in training. All manuals must be kept secure and accounted for after each use.
- e. 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 the bottom.

II. Topics

- a. All state test materials are counted in and accounted for by the district office testing team. Counts are documented and packaged for pick up by school. The school test coordinator picks up Paper/pencil test materials.



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- b. In order to maintain the integrity of the assessment program and its results, security must be established and maintained. The responsibility of the assessment program at the school level rests with the principal and their designated school test coordinator.
 - i. Use the Student Assessment in Georgia Schools to discuss the testing ethics and consequences of violations
 - ii. Use the examiner "Must Do" page from the GaDOE's Student Assessment Handbook
- c. School Coordinators are responsible for ensuring proper coding of test documents.
- d. School Coordinators are responsible for checking the accuracy of student information.
- e. School Coordinators are required to have test examiner's sign materials in and out each day during test administration.
- f. Proctors are used when required. All test proctors are trained on their roles/responsibilities.
- g. 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

III. Collection of Materials

- a. Sign-in and sign-out sheets are used to document who is responsible to each individual test booklet, the date, and the number of test booklets received.
- b. Before testing documents are returned to the District Office, the school coordinator carefully accounts for all materials.
- c. Materials are returned to the District Office, where the materials are re-counted by the System Testing Coordinator Team.
- d. Principal Certification Sheets are required on all standardized tests. This document is returned at the time of delivery of the testing materials.

Attendance Area Determinations

Attendance area determinations are calculated using the previous year's October FTE count of children eligible for free/reduced price meals under the School Lunch Act and the October FTE enrollment report. Three of the four schools are Certified Eligibility Programs (CEP). Numbers from CEP are placed in the attendance area determination worksheet provided by the GaDOE and are then ranked from highest to lowest percentage of free/reduced lunches. Pre-K counts are not included in the document. Any of the VCSS schools that are over 75% poverty earn the highest per pupil allocations.

Within District Allocation Procedures

Procedures for Determining Allocations:

After receiving notification of the Title I, Part A grant amounts from GaDOE, reservations in each budget are set aside for required components such as parent involvement, professional learning, neglected and



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delinquent, private school per pupil & equitable services, and homeless students. Administrative costs are also part of the reservations, which are not part of the schools' per pupil amounts. Typically, a request for lesser amount is submitted for professional learning for PQ teachers, since Title IIA funds are sufficient to meet the districts' needs.

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. Low income is determined by the number of free or reduced lunches at a school using the previous year's October FTE count. Once all schools over 75% poverty are served the LEA will rank remaining areas by grade-span groupings. 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, giving each school an opportunity to spend the funds. Either way, schools must submit a written description of the expenditure requests.

Monthly budget sheets are monitored 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.

Procedures for Determining Carryover:

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

At the end of the school year, carryover information is updated and reviewed. Parent Involvement, Flexible Learning Programs (if applicable), and professional learning for Focus and Priority schools are taken into consideration.

Funds are redistributed based on GaDOE criteria.

Reservation of Funds

Flexible Learning Program (FLP): LEAs are required to set aside a minimum of 5% of the LEA's Title I allocation to implement the LEAs FLP in it Title I Focus Schools. The FLP is a district responsibility and all funds are budgeted and charged to the district's central office. FLP funds must be tracked separately in the same way. VCSS has no Focus or Priority Schools at this time.

Professional Development: A lesser amount is requested in professional development for ensuring PQ teacher and paraprofessional requirements since most of the system's teachers and paraprofessionals already meet Professional Qualified status. Title IIA funds are sufficient for this purpose.



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LEA _____

Title I Director's Signature _____

Date _____

Private Schools: Vidalia City School System currently has no Private Schools that have chosen to participate in the Federal programs. If Vidalia City School System ever has any Private Schools to choose to participate all Federal regulations for private school participation will be followed. The private school worksheet would be completed and attached to the Consolidated Application to ensure that all reservations related to parental involvement, instructional lead teachers, professional learning, and paraprofessionals have been reserved.

Homeless Children and Youth: Title I schools are required to set aside funds within their budget to meet the needs of homeless children and youth. VCSS conducts an annual survey to determine the number and location of homeless children and youth residing within the jurisdiction of the LEA. VCSS uses state and local funds to provide assistance to homeless students. In addition, Vidalia City School System sets aside funding in its Title I funds to satisfy unmet needs of homeless population of all schools. The Homeless liaison consults with and trains school personnel how to identify children in homeless situations. A home survey is also used to identify homeless students. The Homeless liaison is consulted if a student is found to need transportation to a school of origin and arrangements are made through the transportation department. Needs assessments are conducted by the school counselor when a child is identified as homeless. The Homeless Liaison is contacted and will provide the needed supplies. Vidalia City School System identifies homeless students' needs and funds accordingly (Method 4).

Neglected and Delinquent Children: The reservation amount provided by the GaDOE in the Title I, Part A allocation letter and worksheet is the amount set aside for neglected and delinquent children. Currently, there is one residential facility for neglected children, Paul Anderson Youth Home. The Annual Survey of Local Institutions for Neglected and Delinquent Children is completed each year and is based on the children residing at the home for 30 consecutive days with at least one being in October.

The district uses the information provided by the GaDOE to determine reservations for parental involvement, FLP, Private Schools, Indirect cost, and Neglected and Delinquent.

Services for Homeless Children and Youth

Vidalia City School System District Homeless Liaison, Gwen Warren, meets at a minimum, yearly 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 works closely with school administrators and guidance counselors and the transportation departments to ensure students receive the services they need. Posters are placed



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throughout the schools and community where parents and students can readily see the services provided. A meeting is held annually to review and revise if needed.

Procedures to Implement the McKinney-Vento Homeless Assistance Act

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

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

Definition

Homeless students, including unaccompanied youth, are defined as lacking a fixed, regular, and adequate nighttime residence, including children who are:

1. Sharing the housing of other persons due to loss of housing or economic hardship;
2. Living in motels, hotels, trailer parks or camping grounds due to the lack of alternative adequate accommodations;
3. Living in emergency or transitional shelters;
4. Are abandoned in hospitals;
5. Awaiting foster care placement;
6. Living in public or private places not designed or ordinarily used as a regular sleeping accommodation for human beings;
7. Living in cars, parks, public spaces, abandoned buildings, substandard housing, transportation stations or similar settings;
8. Migratory children living in conditions described in the previous examples.

Identification

In collaboration with school personnel and community organizations, the school system's homeless liaison will identify children and youth experiencing homelessness in the system, both in and out of school. The liaison will provide training and information to school personnel on possible indicators of homelessness, sensitivity in identifying families and youth who are experiencing homelessness, and procedures for forwarding information indicating homelessness to the liaison. The liaison will also provide information to school registrars and secretaries about how to inquire about possible homelessness upon the enrollment and withdrawal of students and how to forward information indicating homelessness to the liaison. Community



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partners in identification may include: family and youth shelters, soup kitchens, motels, campgrounds, the Division of Family and Children Services and other social service agencies, faith-based organizations, truancy and attendance officers, and legal services.

School Selection

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

Feasibility shall be a child-centered determination, based on the needs and interests of the particular student and the parent or youth's wishes. Potential feasibility considerations include: safety of the student; continuity of instruction; likely area of family's or youth's future housing; time remaining in the academic year; anticipated length of stay in temporary living situation; school placement of siblings; and whether the student has special needs that would render the commute harmful.

Enrollment

The school selected for enrollment should immediately enroll any child or youth experiencing homelessness. Enrollment should not be denied or delayed due to the lack of any document normally required for enrollment, and the homeless liaison will assist in obtaining such documents, including: birth certificate or other evidence of date of birth; proof of residency or guardianship; transcripts/school records; or immunization/health/medical records.

Unaccompanied youth should also be immediately enrolled in school. They may either enroll themselves or be enrolled by a parent, non-parent caretaker, older sibling or the school system's homeless liaison.

Transportation

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

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

Services

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



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

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

School personnel shall also inform parents of all educational and related opportunities available to their children and provide parents with meaningful opportunities to participate in their children's education.

Disputes

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

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

Free Meals

The U.S. Department of Agriculture has determined that all children and youth experiencing homelessness are automatically eligible for free meals. Children and youth experiencing homelessness are eligible for free meals on the first day of enrollment.

Title I, Part A

Children and youth experiencing homelessness are automatically eligible for Title I, Part A services, regardless of the school they attend. The district shall provide services comparable to those provided to Title I, Part A students to children and youth experiencing homelessness attending non-participating schools.

Services for Neglected and Delinquent Children



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There is one facility for neglected students in Vidalia City School System: Paul Anderson Youth Home. The shelter provides services for children ranging in age from birth to seventeen. The children do not attend Vidalia City Schools. The group can access Neglected and Delinquent Set-Aside funds through collaboration with the Director of Federal Programs, as needed.

Funding, calculated from the Annual Neglected and Delinquent Survey, provides the GaDOE with current information on the location and number of children living in the institution for neglected children. The information is used to compute the Title I N & D allocations for school districts so that eligible children in the institutions can be provided Title I funded educational services. The survey must include children and youth who are 5-17 years of age and live in the institution for at least one day during a 30 consecutive day counting period, with at least one day of the counting period being in October.

Prevention and Intervention Programs for Children Who Are Neglected, Delinquent, or At-Risk

Not applicable

Title VI, Part B- Rural and Low Income

Purpose

The Rural Education Achievement Program (REAP) is designed to assist rural school districts in using Federal resources more effectively to improve the quality of instruction and student academic achievement. It consists of two separate programs – the Small, Rural School Achievement (SRSA) program and the Rural and Low-Income Schools (RLIS) program.

Activities authorized for Title VI, Part B funding:

- A. Teacher recruitment and retention, including the use of signing bonuses and other financial incentives as authorized by Title II, Part A (Teacher Quality).
- B. Teacher professional development, including programs that train teachers to utilize technology to improve teaching and to train special needs teachers as authorized by Title II, Part A (Teacher Quality).
- C. Educational technology, including software and hardware, as described in Title II, Part D (Enhancing Education Through Technology).
- D. Parental Involvement activities as authorized by Title V, Part A (Innovative Programs).
- E. Activities authorized under Title IV, Part A (Safe and-Drug Free Schools and Communities).
- F. Activities authorized under Title I, Part A (Improving the Academic Achievement of the Disadvantaged).
- G. Activities authorized under, Title III, Part A (Language Instruction for Limited English Proficient and Immigrant Students).



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****Vidalia City School System does not receive funds for this program****

Title II, Part A- Teacher and Paraprofessional Qualifications

Purpose

The purpose of the Title II, Part A program is to increase academic achievement by improving teacher and principal quality. The goal of the Title II-A program is for each school to have a teaching staff that is Professional Qualified and effective in helping all students, regardless of individual learning needs, achieve challenging state content and academic achievement standards. A secondary goal is for every student to have an equitable opportunity to receive quality instruction in terms of teacher quality, teacher experience, and class size.

What does ESSA say about qualifications?

- ESSA says that state education agencies (SEAs) and Local Education Agencies (LEAs) must ensure teachers meet applicable state certification requirements [Sections 1111(g)(2)(J), 1112(c)(6)]. In Georgia, under OCGA § 20-2-2065, state certification can be waived for most teachers, meaning that each LEA that waives certification must establish professional qualifications (PQ) for their teachers.
- ESSA says the SEA must report information on the qualifications of the teachers including out-of-field.

How can my LEA ensure that teachers meet PQ and In-Field?

- Establish professional qualifications that take subject matter competency into consideration either by requiring certification or the GaDOE accepted equivalent.

Teachers of Special Education Students

ESSA Sec. 1112, IDEA Sec. 612(a)(14)(C), OCGA §20-2-80, 20-2-2065, SBOE 160-4-9-.04, 160-4-9-.05, 160-4-9-.06, 160-5-1-.33

Special Education:

Teachers required to hold special education certification must hold certification in adapted or general special education curriculum that aligns to the course(s) being taught and the IEPs of the students being served. They may NOT waive certification in adapted or general special education curriculum.

Content:

All special education teachers issuing grades are required to hold content area certification in the subject field and grade level bands for which the teacher is assigned (K-5), (4-8), (6-12) in accordance with the cognitive level specified in the student's Individualized Education Plan (IEP).

Charter and SWSS Waivers:



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In Georgia, only teachers in LEAs that waive certification may verify content through equivalent degree, coursework or content test; this must be in compliance with the LEA certification waiver procedures outlined in the Comprehensive LEA Improvement Plan (CLIP).

Emergency/Provisional:

In accordance with Individuals with Disabilities Education Act (IDEA), special education teachers in Georgia may not hold emergency or provisional special education credentials. This means that a teacher holding a GaPSC Non-Renewable Professional (N), Waiver (W), or Supplemental Induction (SI) certificate may not meet Georgia's Professional Qualification Requirements.

Professional Qualifications for Paraprofessionals

ESSA Sec.1111(g)(2)(M); GaPSC Certification Rule 505-2-.18

The State of Georgia ensures that it has professional standards for all paraprofessionals working in any school, including qualifications that were in place on the day before the date of enactment of the Every Student Succeeds Act. In Georgia, a paraprofessional employed by a Georgia LUA, must meet one of the following requirements:

Degree:

Hold an associate's degree or higher in any subject from a Georgia Professional Standards Commission (GaPSC)-accepted accredited institution; or

Coursework:

Have completed two (2) years of college coursework (sixty [60] semester hours) at a GaPSC-accepted accredited institution; or

Content Area Test:

Have passed the GACE Paraprofessional Assessment. If eligibility is established through the assessment, the applicant must also hold a minimum of a high school diploma or GED equivalent.

Equity Belief Statement

The administration and staff of the Vidalia City School System believe all students have equitable opportunity to receive quality instruction therefore; the overall mission of the school system is "To provide all students an education which promotes excellence, good citizenship and a love of learning." It is imperative that students be taught by effective, Professional Qualified teachers and have comparable class sizes so that the diverse learning needs are met.

Annual Needs Assessment Process

Vidalia City Schools needs assessment process focuses on the collaboration of all stakeholders including teachers, staff, and administration and parents/community members. School personnel along with parents and community members are provided a two-week window in May to complete the on-line needs assessment survey. Upon completion of the scoring data is distributed to site administrators to be incorporated into the school improvement plan. A locally developed survey for parents and community stakeholders is given out each August at Title I site meetings. The needs assessment process is a continuous process and changes are made when needed. The Vidalia City needs assessment for staff and certified personnel requirements originate in the Personnel



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Department. Each school participates to share site needs in the early spring and the system level needs assessment is developed which targets improved student achievement and all equity components.

Equity Plan

The Vidalia City School System Equity Plan for Title II-A is revised each May/June using needs assessment surveys and other forms of current data. The Equity Plan serves as the plan detailing professional learning and effective equitable practices among teachers. Department Directors, school and system leaders, as well as, community and parent stakeholders are invited to participate in the revision process. As the Equity Plan is revised, it is shared with all leadership teams and becomes part of the Comprehensive Needs Assessment. Principals seek input from school council members and then give feedback for revisions. Meeting agendas and sign-in sheets will be maintained as evidence and documentation of stakeholder involvement in the revision process. The system follows the Equity Plan Assessment of Effectiveness for monitoring the progress of implementation. Once an equity indicator is completed a summary of effectiveness is completed and filed for future reference. A variety of sources of information are used to determine professional learning needs. Sources include professional qualification reports, Equity data, schools' Equity Gaps Analysis information, district wide AdvancED plans, and responses indicated on the School Improvement Plans, District Strategic Plan, formal and informal data collected through school and district needs assessments, surveys, test data, discipline and attendance records, walkthrough observation data, TKES and LKES reports, professional development plans developed for individuals/specialized groups, and other areas of weakness identified in school improvement plans.

Comprehensive Needs Assessments components are: (1) recruitment; (2) retention; (3) Professional Qualified status of core academic teachers and paraprofessionals; (4) professional learning for teachers, paraprofessionals, principals, assistant principals and superintendents; (5) equitable opportunities for all students. These components are addressed in the equity plan submission.

Implementation of Equity Plan

As the equity plan is reviewed and revised, steps are taken to ensure that the plan will be implemented with fidelity. In collaboration, key stakeholders

1. Prioritize the Needs and determine what strategies/activities will most likely impact root causes.
2. Define action steps to implement the prioritized strategies/activities
3. Determine what deliverables will be needed.
4. Schedule strategies/activities.
5. Associate funding with strategies, innovating whenever possible.

Prioritization of Needs

Internal and external stakeholders are involved in the planning process by assisting with the prioritizing of needs. Prioritization of needs is accomplished by analyzing percentage of response to various questions on the annual needs assessment. Leadership meetings will also be held to assist in planning prioritization of needs.

Authorized Use of Funds

Title II funds can be used for recruitment, retention, professional development, and class size reduction. Title II-A funds must be used to *supplement, not supplant* non-Federal funds that would otherwise be used for activities



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authorized under Title II-A. 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.

Effectiveness of Title II, Part A Funded Activities

The Director of Federal Programs along with Administrators, District Administration, Coordinator for Professional Learning, and Director of Evaluation, Assessment and Accountability will discuss and review Title II, A funded activities to determine the effectiveness of funded activities. Data, surveys, and observations will be used for determining effectiveness of activities.

Professional Learning

Professional Learning must be of high quality, sustained, intensive, and classroom-focused in order to have a positive and lasting impact on classroom instruction and the teacher's performance in the classroom and are not 1-day or short-term workshops conferences. It must also address one or more of the annual LEA prioritized needs. Finally, professional learning must focus on increasing the ability of the teaching staff to help all students achieve high academic standards, or the school administrative staff to lead their schools' efforts to increase student academic achievement. The Coordinator of Professional Learning reviews all professional learning activities to ensure they are scientifically based or based on evidence of program success before submitting recommendation of funding to Director of Federal Programs.

Annual Increase in the % of teachers receiving high quality PD

VCSS strives to offer ample opportunities for teachers, administrators, and paraprofessionals to attend professional development that enables teachers to become experts in their field as well as successful classroom teachers. Teachers are provided with opportunities to attend professional development during school, after school and during summer break. All courses are documented and kept on file.

Procedures for Annual Training On Professional Qualification Requirements

Administrators receive a copy of the Federal Programs manual which includes Human Resources Procedures. The handbook has various information pertaining to HR compliance. Included is detailed information on Professional Qualifications Requirements. In addition to the information that is provided in the handbook, PQ requirements are discussed at Principals' Leadership PLC meetings. HR personnel remind principals frequently of PQ requirements through individual meetings, emails, and memos.

Professional Qualified Teachers

Vidalia City School System takes pride in our efforts to ensure that our teaching and paraprofessional staff meet 100% Professional Qualifications as required under ESSA. Annually, administrators are trained on PQ requirements for the hiring and placement of teachers and paraprofessionals. District level personnel goes over all pertinent information and keeps a copy of the agenda and sign in sheet for documentation.

Recruitment, Placement, and Retention of Professionally Qualified, Effective Teachers

System employees continue to attend regional and state recruitment fairs. Recruitment materials are updated annually to highlight district progress and achievements. The system continues to be proactive and look for PQ personnel for employment. Each school generates a list of teacher needs and in-city transfers are considered on the first round. Position advertisements are listed in the newspaper, on the VCSS web site and on "Teach Georgia"



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and applications are encouraged. Each administrator has access to all applications for vacant positions. After applications are received and reviewed by the Personnel Department, information is sent to the school based on the identified site needs. Interviews are conducted at the site level. Recommendations for employment are completed by the site administrator and sent to the Superintendent for approval before being presented to the Board of Education. VCSS is fortunate to that our retention is well below the state average. It is the responsibility of the site administration to assign teachers to classes for which they have PQ credentials. This is discussed with principals both in a group meeting and individually with central office staff.

Central Office works to retain PQ teachers for all of the schools. The system has a mentoring program for personnel new to our system and those with less than three years of experience. The on-site mentors work with teachers on a variety of concerns. There is constant communication and support for new personnel to determine the most urgent concerns. Classroom visitation and observation is a part of the plan. Grade and/or content transfers, as well as professional learning, may be a solution for an addressed concern. The overall professional learning plan for employees may require additional content tests, college coursework, Edivate (professional learning modules), etc. Title II funding provides reimbursement for the individuals passing the GACE content test. Because we are a small system, instructional support and job embedded professional learning is organized at the district level. District level curriculum specialists provide training to support teachers in their efforts to deliver effective classroom instruction. Formal evaluations at the school sites, utilizing the approved format, allows for individual teacher support through a professional development plan, when needed. This plan provides specific content activities for the individual with follow-up support and classroom monitoring, as required. Teachers who leave the schools each year are asked to complete an exit interview to assist the Personnel Department as to reasons for the move. Exit information gathered by that department is shared with appropriate personnel if concerns, other than military moves, are noted. This information is also shared with site and system administration. If we are addressing a system wide specific group need, that would be the increased need for Special Education teachers as this population has increased in recent years.

Teacher Effectiveness

To access teacher effectiveness, Vidalia City School System continuously looks at student achievement data. Consideration is given to class grades, standardized test scores, focus walks and pass/fail rate per nine week period. The district examines assessment data along with teacher evaluation information and teacher experience data. Compiled this allows the district to identify teachers who are effective as well as ineffective.

Principals have site-specific information necessary for placing teachers in grade levels/content areas within their school. In both individual and group settings, administrators discuss with central office personnel their placements. Monitoring takes place from the central office administrative team to follow up on site decisions. If effectiveness and experience issues are recognized, the central office staff administrative team and principal meet for options. A goal for the school district is that all students will have equal access to experienced teachers. Professional development plans are in place to assist teachers in becoming more effective. Mentoring and district level support from Instructional Specialists is also available as additional support.

The Vidalia City School System uses the assessment tool Teacher and Leader Keys (TKES and LKES). These assessment tools monitor effective performance of all teachers. Individual principal meetings are held with the central office staff to reinforce the need for reviewing student achievement by classroom before assigning



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students. Decisions are made for additional mentoring, change in student schedules, professional development, or classroom visitations if follow-up is needed at the site. Low performing teachers will be assigned a mentor to assist in lesson planning, delivery and student engagement. The student information system provides detailed enrollment history that can be used to further monitor the placement of individual students with experienced and effective teachers.

Individual and group meetings are held with administration to alert and caution them to review data to ensure that no student has an inexperienced, ineffective teacher for two years in a row. Site administrators make initial decisions about student assignments. The administrative team keeps information on students who were taught by an inexperienced or marginal teacher. Principals will also review the teachers' annual performance to determine teacher effectiveness. When students are placed for the next year, these students are assigned to an experienced and effective teacher. Professional development plans are in place to assist teachers in becoming more effective.

Meeting the Diverse Needs of Students

VCSS uses several resources to assess teacher ability to differentiate instruction based on diverse needs of students through the score analysis of various assessments. Teachers' formative and summative assessment data is carefully monitored to determine teacher effectiveness in ensuring all students are progressing. At elementary middle, and high school grade level meetings, techniques for differentiation are shared. Staff will participate in professional learning or personalized learning. Professional development has always contributed to teacher support in the district. Teacher surveys, teacher evaluations and principal input are all used to identify teachers in need of preparation to meet the diverse needs of students.

Procedures for Hiring Instructional Paraprofessionals

Paraprofessional vacancies are posted on the Vidalia City School System webpage. A job description is included. All instructional paraprofessionals hired must meet professional qualifications. All paraprofessionals must have:

- Completed at least 2 years of study at an institution of higher education *or*
- Obtained an associate's (or higher) degree; or

- Met a rigorous standard of quality and can demonstrate, through the Georgia state-approved paraprofessional assessment:
 - Knowledge of, and the ability to assist in instructing, reading, writing, and mathematics; or
 - Knowledge of and the ability to assist in instructing, reading readiness, writing readiness, and mathematics readiness, as appropriate.
- All Georgia paraprofessionals must hold a valid state paraprofessional certificate issued by the Georgia Professional Standards Commission.

Remediation Plans

A written remediation plan is developed any time a non-PQ hire and/or placement are made in the district. This remediation plan is developed with the non-PQ teacher, school administrator, and Curriculum Director/Professional Qualified. A copy of the plan will be forwarded to the Director of Federal Programs. The Assistant Director of HR and non-PQ employee will collaborate to identify the necessary professional learning



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activities, tests or other certifications needed. After this identification the information is shared with the building administrator who monitors the remediation process. In order to assist non-PQ teachers to satisfy the requirements in their remediation plan, the district has partnered with agencies and organizations to assist in training, mentoring and monitoring. Each plan includes specific action to become PQ and timelines and target dates are set that will enable the non-PQ teacher to attain Professional Qualified status as soon as possible. Title II funds are used to reimburse teachers who pass the GACE required testing for their PQ plans. Vidalia City School System strives to hire only Professional Qualified paraprofessionals. Should a non- PQ para be hired or if their certificate lapses, a remediation plan will be developed, implemented and monitored by the building administrator and the Assistant Director of HR. For all personnel with non-PQ certificates, a VCSS plan is currently completed at the school site as school begins. If the teacher/paraprofessional already has a plan in place then it must be updated for the new year with specific timelines and signatures of the building administrator, staff member and Assistant Director of HR.

Once a remediation plan has been implemented the building administrator and Assistant Director of Human Resources monitor it. The Assistant Director of HR monitors the certification data provided by the Professional Standards Commission routinely to address any non- PQ teacher or teacher without a clear renewable certificate. Non-PQ teachers, along with teachers who hold NT certificates are identified at the beginning of the school year or when placed and each teacher is monitored monthly by the building administrator and Assistant Director of HR to ensure progression is made toward obtaining Professional Qualified or clear renewable status. The Assistant Director of HR will send a summary to the Director of Federal Programs monthly detailing progression. Administrators are reminded at monthly administrative meetings of their responsibility of ensuring all current and applicants are PQ. At a minimum the remediation plans developed for the employee is reviewed each semester. Timelines for the next phase of remediation can be established with appropriate signatures. If the employee fails to meet the guidelines or timelines of the plan they may not be offered a contract for the upcoming school year.

Class Size Equity

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

Federal Requirement-Parents' Right To Know

THE REQUIREMENT:

ESSA Sec. 1112(e)(1)(A) In Georgia, all LEA schools are required to notify parents at the beginning of the school year of their 'right to know' the professional qualifications of the student's classroom teacher(s) and paraprofessional(s).

THE NOTIFICATION:

In compliance with the requirements of the Every Student Succeeds Act, parents may request the following information:

1. Whether the student's teacher—
 - o has met State qualification and licensing criteria for the grade levels and subject areas in which the teacher provides instruction;
 - o is teaching under emergency or other provisional status through which State qualification or licensing criteria have been waived; and
 - o is teaching in the field of discipline of the certification of the teacher.
2. Whether the child is provided services by paraprofessionals and, if so, their qualifications.



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Procedures for Professional Qualifications

The Department of Federal Programs, along with Human Resources, will maintain a list that includes the status of all Title I paid staff. In Vidalia City, all staff paid from Title I funds must be Professional Qualified. 100% of paraprofessionals meet PQ.

Professional Qualification v. In-Field

Federal law requires states and LEAs to ensure ALL teachers meet state certification requirements. In Georgia, state law allows LEAs to waive certification. Accordingly, LEAs must establish the professional qualification requirements for ALL LEA teachers. This is monitored for compliance. In addition, federal law requires states to publicly report the number of teachers who are not teaching in the subject or field for which the teacher is certified. GaDOE will use GaPSC in-field rules to determine in-field qualifications. For LEAs that waive content area certification, teachers may demonstrate equivalent in-field qualifications by degree, coursework or content area test as reported in Fall CPI Cycle.

Procedures for Parent Notification of Professional Qualifications

1. Parents are informed when a teacher who is not “Professional Qualified” has taught their child for 20 or more consecutive days. Parents are notified via standard receipt received mail. The steps the school must follow are listed:

- A principal or school designee will email the Director of Human Resources & Administrative Assistant to the Superintendent when a teacher has been out 20 consecutive days.
- The principal will provide a letter that meets the parent notification requirements.
- The parent letter will be distributed to all students who have this teacher as their teacher of record.
- Personnel will send this information to parents and secure documentation for monitoring.

Personnel will collaborate with the Source4Teachers to ensure that each school reports all teachers who have been out 20 or more consecutive days. This report will be checked against documentation received from the schools at the central office level.

Instructional Paraprofessionals

In the event instructional paraprofessionals are funded out of Title I, the following will be followed:

- Administration will annually train Title I Instructional Paraprofessionals on best practices.
- A signed schedule documenting the paraprofessional is under the direct supervision of a certified teacher must be submitted to the Federal Programs Department by the second week of school.

Title III, Part A

Purpose



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An ESOL program plan is designed to provide consistent and non-discriminatory procedures throughout each school within Vidalia City School System as recommended by the U.S. Office for Civil Rights, Department of Education. The Civil Rights Act 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.

Vidalia City School District has an EL Plan for 2017-2018 that is located on the district web page under the Federal Programs Tab. The plan includes EL procedures, evidence of policy dissemination to local schools, research-based delivery models used at each school, description of how ACCESS and GA Milestones data are used to make instructional decisions, evidence of adjustment to services based on assessment results, progress monitoring procedures for EL students, and the process and criteria used for transitioning ELs to monitored status. Each school codes all EL eligible students in the student information system (PowerSchool). LEA professional development plan for ESOL, including needs assessment, long-range professional development goals, meeting dates, session agendas, handouts, and sign-n sheets are kept on file in the Teaching & Learning Department. Title III purchase orders, budget, and after-the-fact (January and May) periodic certifications are monitored and kept on file in the Director of Federal Programs office. Vidalia City School System has no private schools requesting to participate in the Title III program at this time.

Section 14: Private Schools

Title I, A

Under ESSA, the purpose of Title I, Part A is to ensure that all children have a fair, equal, and significant opportunity to obtain a high quality education and reach, at a minimum, proficiency on challenging state academic achievement standards and state academic assessments.

ESSA requires that the local educational agency (LEA) provide to eligible private school children, their teachers, and their families, services that are equitable to the services being provided to similar children, their teachers, and their families, attending public schools. Title I services for these children must be developed in meaningful consultation with private school officials. Services provided to private school children by an LEA must be secular, neutral, and non-ideological.

Eligible private school children are those who:

- Reside within the attendance area of a participating public school, regardless of where the private school they attend is located.
- Are identified through consultation with the private school as failing, or most at-risk of failing, to meet high student academic achievement standards.

Title II, A



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Under the *Title II, Part A* program, private school teachers, principals, and assistant principals are eligible to participate to the extent that the LEA uses funds to provide for professional development for teachers and other school personnel. Funds awarded to SEAs and LEAs under *Title II, Part A* are subject to the uniform provisions of Section 9501 of the ESEA (*Participation by Private School Children and Teachers*). The statute requires LEAs to provide private school children, their teachers, and other educational personnel with educational services on an equitable basis and in a timely manner. (*Title II, Part A Non-Regulatory Guidance*, Revised October 5, 2006).

- The Elementary and Secondary Education Act requires that public LEAs contact appropriate officials of all private schools within the geographic boundaries of the LEA *annually* to determine if they want their teachers to participate in the Improving Teacher Quality State Grants program, regardless of whether or not those officials have recently indicated any interest in program participation.

Title III

Title III of the ESSA allocates funds to LEAs that may be used to provide services and materials for limited English proficient students (LEP) and immigrant students enrolled in nonpublic schools. The number of Title III-eligible private school students is annually reported in Student Record by LEAs and this private school English Learner counts are included in the annual Title III district allocations. LEAs must ensure that Title III funds expended on nonpublic school services are done so in accordance with federal regulations and for the purpose of providing high-quality professional development and assisting LEP students achieve English proficiency and meet academic standards. The LEA may not use Title III funds to pay for private school services that, in the absence of Title III funds, would be necessary to be provided by other Federal, or State, or local funds. In general, when using Title III funds to support nonpublic school students, Title III/Title III Consortium school districts must ensure that the following requirements are met:

- LEAs receiving Title III funds must annually provide private schools located in the geographic area served by the LEA with a timely and meaningful opportunity to participate in educational services intended for LEP children and educational personnel.

Invitations for private schools to consult in participation in federal programs the following calendar year are sent in the fall, usually October, via receipt delivery. A meeting is held to present information about the programs available to students in private schools. All federal programs directors are invited to the meeting, which is complete with an agenda and sign in sheet. Upon receipt of the intent to participate form, which is provided to private school officials, a meeting is held to discuss plans and the required components of Title I services for private school students. Meetings are scheduled periodically to discuss the progress and process of Title I services. Currently Vidalia City School System does not serve any private schools. If a private school does wish to participate the Vidalia City School System will use the USED guidance attached.

If Vidalia City School System has a Private School to request funds the private school students would receive their proportional share of services via a per pupil allocations and required services amounts. 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 range points and point values are applies to those ranges.



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

Identification of Participants (Private School)

The LEA will work closely with the private school to verify attendance area of possible students.

It is the responsibility of the private school to provide potential students names, addresses, and verification of free and reduced participation for qualification of the student (DE1111). The Administrative Assistant to the Federal Programs Director is responsible for obtaining the DE1111 information and will be responsible for entering the correct private school data into the GADOE collection portal.

Finance

It is the responsibility of the private school to submit requisitions to the LEA for materials and services for the LEA to process. No requests for reimbursement will be allowed, as all purchases must have prior approval by Federal Programs Director.

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

The LEA will maintain an inventory. The private school will complete an inventory check twice per year at the request of the Vidalia City School System.

Complaints

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

Evaluation

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

Equipment

The private schools will follow the same procedure as Vidalia City School System as listed previously in this manual.



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Timeline for Private Schools

October	<ul style="list-style-type: none">*Send letter to private schools with students who are residents of Vidalia City inviting them to participate in Title I, Part A.*Send letter to private schools located within the geographic boundaries of the LEA.
November/December	<ul style="list-style-type: none">*Meet with private school officials to review timeline and consultation process.*Establish a consultation calendar and procedures for collecting data.
January/February	<ul style="list-style-type: none">*Review poverty data collected*Review amount of funds available for services*Determine criteria to be used to select eligible students*Review of options for services provided*Set up dates for future meetings
March/April	<ul style="list-style-type: none">*Obtain DE 1111 from private school officials lists of names, addresses, and grades of private school students who meet criteria for Title I service collected by Assistant to Title I Director*Rank students by greatest need for service*Select Title I services for students*Discuss how the Title I program will be evaluated
May/June	<ul style="list-style-type: none">*Finalize the designs of the Title I programs for upcoming year*Ensure LEA personnel who are providing services are in place and service start date is firm;*Finalize professional development programs and activities*Finalize parental involvement programs and activities*Provide consultation affirmation form*Provide equitable services affirmation form for signatures
July	<ul style="list-style-type: none">*Ensure private school materials have arrived and are delivered
August/September	<ul style="list-style-type: none">*Inform private school officials of the Title I program services*Begin Title I services for students identified the previous spring



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August/September	<ul style="list-style-type: none">*Review criteria to be used for evaluation of the effectiveness of the Title I program*Conduct academic pre-assessments*Host Title I parent information meeting for participating parents*Complete a Parent Compact
October-March	<ul style="list-style-type: none">*Meet with private school officials periodically*Meet with Title I teacher periodically*Monitor implementation of the parent involvement component*Monitor implementation of the professional development*Ensure conferences are occurring between Title I teacher and private school teachers. Between Title I teacher and parents of participating students*Physical inventories of equipment
April/May	<ul style="list-style-type: none">*Complete parent survey*Gather documentation to evaluate the effectiveness of the Title I program based on the criteria established at the beginning of the school year.*Evaluate effectiveness of the program



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Sec. 1120(b) of the *Elementary and Secondary Education Act* and Sec. 200.63 of the Title I regulations require that timely and meaningful consultation occur between the local education agency (LEA) and private school officials prior to any decision that affects the opportunities of eligible private school children, teachers, and other educational personnel to participate in programs under this act. Consultation 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 Sec. 200.10 of the Title I regulations and how the LEA will use the results of that assessment to improve Title I instructional 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; and
- 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.

We agree that timely and meaningful consultation occurred before the LEA made any decision that affected the participation of eligible private school children in the Title I, Part A, program.

Public School Official

Date

Private School Representative

Date



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School District

Name of Private School Agency or School

Academic Achievement Awards Program

Vidalia City School System does not have any Reward Schools this year. If recognized, the following would take place.

The Georgia Department of Education’s (GaDOE’s) Academic Achievement Awards Program honors and rewards K-12 Title I schools and school districts for significant progress in improving student achievement and/or making significant progress in closing the achievement gaps. Georgia’s ESEA Flexibility Waiver has allowed the State’s Title Programs Division to move from the ESEA’s Distinguished School and Distinguished District Awards Program to the Reward School and Reward District Program.

Title I Reward Schools

The Title I Reward Schools Program recognizes and honors two categories of Reward Schools: Highest-Performing Reward Schools and High-Progress Reward Schools.

- A Highest-Performing Reward School is 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.
- A High-Progress Reward School is among the top ten 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, among the top ten percent of 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.

Reward Schools may use their Academic Achievement Award funds to provide teachers and staff bonuses and/or to purchase instructionally related supplies and services for the school.

Funding for the Title I Reward Schools Program is provided through the Title I, Part A of the Elementary and Secondary Education Act of 1965 (ESEA). ESEA allows state educational agencies (SEAs) to earmark funds from its total Title I, Part A allocation to reward schools for academic success. Seventy-five percent of the funds must be distributed to those schools with the highest percentage of poverty.

Georgia will recognize Highest-Performing and High-Progress Title I Schools each year at the Annual Statewide Title Programs Conference. Further, when available, these schools will each receive a monetary reward equal to



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Georgia’s total reward allotment divided by the total number of reward schools. Each Title I Highest-Performing and High-Progress School will also receive a Reward Certificate.

Each Reward school must submit the attached Plan.

Rewards School Plan

**School/District Plan
For Use of Title I, Part A Reward Schools/District
Academic-Achievement Awards Budgets for 2016-2017**

Instructions: Please complete the following narrative and attach the narrative to the consolidated application when submitting your budgets. The district’s Title I Director must ensure that the descriptions portion of the budget details page found within the consolidated application provides specific detail for each item budgeted for both the district and its Title I Reward Schools.

District Name _____

Please provide a narrative response to the questions below:

1. Please provide a narrative description that summarizes the activities and materials to be funded using the Title I, Part A Reward Schools/Districts Award for the school/district receiving an award as identified at the end of this form. This summary must delineate the decision-making process utilized at the reward school/district for determining the expenditure of the Title I, Part A Academic Achievement Award funds. A listing of the staff with job titles who were involved in the decision making process at the school/district must be included in the description.
2. What-processes and procedures does the school/district have in place to monitor the use of the Title I, Part Academic Achievement Awards monies?
3. What internal controls does the school/district have in place to promote efficiency of the implementation of the school/district plan for this award, to assure appropriate use and expenditure of Academic Achievement funds, and to safeguard assets and/or avoid fraud and error?

Principal’s Signature: _____ Date: _____

School name: _____



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Title I Director's Signature: _____ Date _____

Superintendent's Signature: _____ Date _____

*Please Note: If this is a Reward School Award provide the principal's signature and date of signature, as well. If this is a Reward District Award only the Title I Director/Coordinator and Superintendent's signatures are required.

Rewards School Budget

Procedures for Submitting Title I, Part A Academic Achievement Awards Budgets

Each school will complete the Use of Funds Form indicating how the school will use their funds and paper budget information to the Director of Federal Programs. The Director of Federal Programs will follow the steps listed below:

In order to effectively manage Title I, Part A budgets via the consolidated application (ConApp) the following procedures are provided as a guide.

- Select the Title Programs Tab within the ConApp
- Select Add the Program Tab (Reward Schools, Reward Districts, or National Title I Distinguished Schools) from the drop down menu
- Click on the Budget Tab and perform the steps to allocate funds to each function and object code
- Select the Function Code: for example function code 1000 for direct instruction
- Select an Object Code: for example object code 110 for teachers
- Enter the Unit Value: for example the number 5
- Enter the Price: for example the actual dollar value
- Enter a clear detailed description of how the funds will be being used
- Click the Add Button

You are now ready to sign off when all line items have been entered in the same fashion. Sign off will be completed by the Title I Director/Coordinator and Superintendent

*Important to Note: The superintendent must accept assurances before signing off on the 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 Academic Achievement Awards.

Use of Funds – Quick Reference For Title I, Part A Reward Schools/Districts

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

- Resources/instructional materials for English/language arts/reading, mathematics, social studies, and science
- 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 personnel classification when making awards to personnel, if a schoolwide program and Title I staff, if a targeted assistance program. Schools may award different



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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.

The current principal when the award is received 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 74.36. For example; purchases of fabric chairs would be considered reasonable and necessary whereas leather chairs may not depending on cost. An adequate TV for instructional purposes would be but a 3-D TV may not, again depending on cost.

Section 15: Title I, Part C- Migrant Education Program (MEP) Services

Migrant students are identified through the occupational survey, which is a part of the student enrollment packet. The system liaison makes contact with each migrant family to determine case-by-case needs. Migrant students are then evaluated academically like other students in the school system to determine academic needs. A referral is made to student services to indicate additional services that may be needed for migrant children and family to gain access to other education, health, nutrition, and social services. In addition to local resources, Vidalia City will coordinate with the MEP consortium staff at Abraham Baldwin Agricultural College (ABAC) to provide services to eligible migrant participants.

The Director of Federal Programs along with the Assistant Superintendent of Teaching and Learning will follow 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 professional learning
- Provides services for the educational needs of migrant preschool children
- Evaluates the program
- Maintains an allowable budget