



Rockdale County
Public Schools

RCPS

**OVERARCHING REQUIREMENTS
FOR ALL
FEDERAL PROGRAMS**

FY2024

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Purpose of This Handbook

The purpose of this standard operations procedures handbook is to provide a step-by-step, systematic approach to managing the rules and guidelines of Federal Programs to ensure consistent compliance in the Rockdale County School System. The information provided is used to ensure that the listed federal programs are being implemented accurately and effectively unless specified in the guidance.

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Federal Programs Overview

The purpose of federal education program funding under the Every Student Succeeds Act (ESSA) is to provide Rockdale County Public Schools with supplemental financial resources and assistance in order to ensure equitable access to a high-quality education, regardless of student economic status or other equity factors. Under a variety of recent state-granted flexibility structures (waivers), all Georgia schools have the opportunity to pursue flexibility in exchange for agreeing to measures that will ensure that all students receive an equitable and high-quality education from effective educators. Federal program funds in Rockdale County supplement and support the programs and strategies that help all students thrive through these existing flexibility structures and systems.

While federal funding comes to Rockdale County Public Schools through a variety of funding sources with specific intents and purposes, schools are required to coordinate their Federal funding allocations into their existing flexibility agreements in a manner that ensures that the intent and purpose of each federal program is maintained. In support of autonomy, Rockdale County may consolidate planning efforts (improvement planning, strategic plans and charter/strategic waiver applications), thereby allowing the benefit of carrying forward their existing flexibility structures and systems with the logical integration of Federal funding where and when its defined use is best suited. Currently, Rockdale County is not consolidating their funds.

Applications to the Georgia Department of Education (GaDOE) for federal funding rely heavily on what has been defined by Rockdale County's flexibility agreements (Strategic Waiver) with the state. Flexibility options in Georgia include Strategic Waiver School Systems, Charter School Systems, and Status Quo School Systems. Each option sets a course for improvement for all students based on academic achievement targets to which the district and schools are committed in exchange for greater flexibility under the law.

Rockdale County Public Schools applies for federal funds through a consolidated application process to the GaDOE. The application requires RCPS to identify the methods through which the intent and purpose(s) of each Federal program will be integrated into the existing academic achievement targets and efforts towards continuous improvement. Responses as to how the RCPS will meet federal program requirements, as defined in ESSA, are submitted in the consolidated application through the lens of the district's flexibility structure. Where very unique and targeted federal funding streams exist, e.g., School improvement funds for Comprehensive and Targeted support, IDEA, homeless, migrant, and rural, RCPS expanded on the identified needs for these populations or schools within the federal consolidated funding application. This required RCPS and schools to delve more deeply into the root causes of the academic deficiencies of these schools and populations. Through its consolidated application, GaDOE supplies CNA tools to support this important aspect of the problem-solving process – examining progress. In summary, when existing targets do not allow for the inclusion of federal funds, districts must define the needs as part of their consolidated application for federal funding.

INDICATOR 1: LEA MONITORING OF SCHOOLS AND PROGRAMS

Overview of monitoring Title I-A; Title I-C; Title I-D; Title II-A; Title III-A; Title IV-A, Title IV-B; Title X and IDEA Under ESEA Act and CARES Act, CRRSA Act and ARP Act under ESSER Act

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

- The Local Education Agency (LEA) Title I Director, Title II Director, Special Education Director and ESOL (Title III, Migrant) Coordinator will conduct self-monitoring of schools and programs sufficient to ensure compliance with Title Program requirements, including Title I, Part A, Title II, Part A, Title I, Part D, Neglected and Delinquent, Title X, Part C/M^cKinney-Vento Act, Title III, Part A, Title IV, Part B, School Improvement and IDEA, CARES Act, CRRSA Act, ARP Act and Ensuring Educational Stability for Children in Foster Care (December 10, 2016 – effective date).
- The Directors/Coordinators of Federal Programs will undergo training from GaDOE and other sources to maintain proficiency in Federal Program compliance requirements. Program Directors/Coordinators will provide technical assistance to the school(s). Program Director’s/Coordinator’s self-monitoring will include monitoring all program expenditures to verify that all program expenditures comply with program requirements.
- Federal Program Directors/Coordinators will maintain all documentation that the LEA may need for future auditing/monitoring according to the LEA Monitoring Form, which is issued annually by GaDOE.
- RCPS will undergo monitoring by GaDOE on a four-year cycle. The LEA/Directors/Coordinators of Federal Programs will participate in training and technical assistance updates as provided by 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, which must be approved by the GaDOE. Implementation of the Corrective Action Plan will be monitored by the appropriate Education Program Specialist.

ESSA ACT	Title I Part A •Improving the Academic Achievement of the Disadvantaged
	Title I, Part A •Programs for Neglected or Delinquent Children
	Title I, Part C •Education of Migratory Children
	Title II, Part A •Supporting Effective Instruction
	Title III, Part A •Language Instruction for English Learners & Immigrant Students
	Title IV, Part A •Student Support & Academic Enrichment

	Title IV, Part B •21 st Century Community Learning Centers
	Title IX, Part A •McKinney-Vento Homeless Assistance Act

ESSER ACT	CARES Act •Coronavirus Aid, Relief & Economic Security Act (ESSER I)
	CRRSA Act •Coronavirus Response & Relief Supplemental Appropriations Act (ESSER II)
	ARP Act •American Rescue Plan Act (ESSER III)

ESSER FUNDS

Elementary & Secondary School Emergency Relief (ESSER)

In response to the economic outcome of the COVID-19 pandemic in the United States, Congress passed three bills that provided immediate and direct financial assistance to state and local educational agencies through the Elementary and Secondary School Emergency Relief funds. These funds were provided to support areas with the greatest need, where the academic and non-academic components of school districts had the most significant impact due to COVID-19. As additional funding was provided, the funds were intended to support state and local school districts' efforts to safely reopen schools, address significant gaps in learning, and support measures of implementation that will continue to reduce the effects of COVID-19 on students and families. Three funding sources were provided to the school district, including:

- **Section 18003 of Division B of the CARES Act-Coronavirus Aid, Relief & Economic Security (CARES) Act**
 - **Equitable Services:** An LEA that receives ESSER funds under the CARES Act (section 18005) must provide equitable services to non-public school students and teachers in the same manner provided under section 1117 of Title I, Part A of the ESEA.
- **Section 313 of the Coronavirus Response & Relief Supplemental Appropriations (CRRSA) Act**
- **Section 2001 of the ARP Act-American Rescue Plan (ARP) Act- Section 2001**
 - The LEA must reserve at least 20 percent of funds to address learning loss by implementing evidence-based interventions, ensure that those interventions respond to students' social, emotional, and academic needs, and address the disproportionate impact of COVID-19 on underrepresented student subgroups.
 - **Maintenance of Equity:** The ARP contains LEA maintenance of equity requirements for FYs 2022 and 2023. The ARP Act ensures that schools and LEAs serving large proportions of historically underserved students receive an equitable share of state and local funds as the nation continues to respond to the COVID-19 pandemic's impact.
 - **LEA Safe Return to In-Person Instruction Plan (LEA ARP Application):** An LEA that receives ARP ESSER funds must publicly plan for the safe return to in-person instruction

and continuity of services on its website. Before making the plan publicly available, the LEA must seek public comment on the plan.

- Six-Month Review: The LEA assures, during the period of the ARP ESSER award established in section 2001(a) of the ARP Act, that the LEA will periodically, but no less frequently than every six months, review and, as appropriate, revise its plan. The LEA will seek public comment on the development of its plan; the LEA will seek public input and take such information into account in determining whether to revise its plan and, if it determines revisions are necessary, on the revisions it makes to its plan.

Use of ESSER funds for minor or major construction, renovation, or modification projects

The Rockdale County School District will ensure that school facility repairs and improvements are solely to reduce the risk of virus transmission and exposure to environmental health hazards, and to support student health needs and inspection, testing, maintenance, repair, replacement, and upgrade projects to improve the indoor air quality in school facilities, including mechanical and non-mechanical heating, ventilation, and air condition systems, filtering, purification, and other air cleaning, fans, control systems, and window and door repair and replacement.

The Rockdale County School District will ensure the required documentation is on file with GaDOE Facilities once all steps are completed for approval of projects by the ESSER Grants Team.

- Submit all required documentation complying with state law regarding Public Works Construction Projects. O.C.G.A. 36-91-20, 36-91-21, and 36-91-22.
- Revise or withdraw any state capital outlay funded projects where ESSER funding was utilized.
- Verify that the construction project will be completed by the end of the grant period.
- Submit required documentation adhering to the Davis Bacon Wage Requirement for all federal contracts and subcontract over \$2,000 for construction, alterations, repairs, painting, and decorating.
- Submit applicable required documents that follow federal construction regulations. 34 CFR75.600-617.

ESSER is its own program intended to help with the COVID-19 response, as such, a LEA must submit a separate grant budget within the Consolidated Application to gain approval for use of the funds.

CARES Act

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

CRSSA Act

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

ARP Act

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

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

Supplement not Supplant

ESSER funds are not subject to a supplement, not supplant requirement.

Maintenance of Effort

ESSER grants do not include a local maintenance-of-effort requirement. In other words, LEA's are not required to maintain effort to receive ESSER funds. LEAs must, however, continue to comply with maintenance of effort requirements in other federal education laws such as ESEA and IDEA.

Local Maintenance of Equity (ESSER III – ARP Act)

Under section 2004(c) of the ARP Act, as a condition of receiving ARP ESSER funds, an LEA may not, in each of FY 2022 or 2023—

- Reduce combined State and local per-pupil funding for any high-poverty school (see Question 23) by an amount that exceeds the total reduction, if any, of combined State and local per-pupil funding for all schools in the LEA.
- Reduce the number of FTE staff per-pupil in any high-poverty school by an amount that exceeds the total reduction, if any, of FTE staff per-pupil in all schools in the LEA.

Equitable Services

An LEA that receives ESSER funds under the CARES Act (section 18005) must provide equitable services to non-public school students and teachers in the same manner as provided under section 1117 of Title I, Part A of the ESEA.

Considerations for ESSER Funds

ESSER funds are subject to the Education Department General Administrative Regulations (EDGAR) and the federal government's Uniform Grant Guidance (UGG), including the requirement that spending be necessary and reasonable.

In light of the necessary and reasonable requirement, LEAs should consider the following:

- ESSER provides LEAs with short-term relief funds to address the effects of COVID-19 on elementary and secondary schools. While it is possible Congress will appropriate additional relief funds in the future, ESSER is not an ongoing program to support long-term expenses.
- As noted above, we encourage LEAs to expend ESSER I funds before spending ESSER II and III funds.
- ED encourages LEAs to spend ESSER funds to safely reopen elementary and secondary schools as soon as possible, to restore and maintain high-quality learning environments, and to take comprehensive action to mitigate learning loss. LEAs should especially consider the needs of its

most vulnerable students including low income students, children with disabilities, English learners, racial and ethnic minorities, students experiencing homelessness, and children and youth in foster care.

- LEAs might use ESSER funds address recruitment or retention challenges considering the pandemic, provide additional compensation to teachers and other staff that work in person, provide additional compensation to teachers and other staff that have assumed new duties because of COVID, incentivize effective teachers to move to schools with vulnerable students that have been disproportionately impacted by the pandemic or provide additional pay to substitute teachers where there is a shortage.

LEA Safe Return to In-Person Instruction Plan

An LEA that receives ARP ESSER funds must publicly make a plan for the safe return to in-person instruction and continuity of services on its website. Before making the plan publicly available, the LEA must seek public comment on the plan.

Use of ESSER Funds for Minor or Major Construction Projects

The Rockdale County School District will ensure that school facility repairs and improvements are solely to reduce the risk of virus transmission and exposure to environmental health hazards, and to support student health needs and inspection, testing, maintenance, repair, replacement, and upgrade projects to improve the indoor air quality in school facilities, including mechanical and non-mechanical heating, ventilation, and air condition systems, filtering, purification, and other air cleaning, fans, control systems, and window and door repair and replacement.

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- Verify that the construction project will be completed by the end of the grant period.
- Submit required documentation adhering to the Davis Bacon Wage Requirement for all federal contracts and subcontract over \$2,000 for construction, alterations, repairs, painting, and decorating.
- Submit applicable required documents that follow federal construction regulations. 34 CFR75.600-617.

On-Site Monitoring of LEA by GaDOE

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

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

- Ensuring that all Federal Program activities are carried out in accordance with federal compliance guidelines
- Equipment usage monitoring
- Academic monitoring
- Budgetary monitoring

The ESSA requires the State Educational Agency (SEA) to monitor the implementation of program requirements and the expenditure of federal funds. The CARES Act grants are included in the GaDOE's monitoring procedures. Georgia's monitoring process consists of four major components:

1. **Monitoring of Expenditures** – Local educational agencies (LEAs) must submit for approval an annual budget through the Consolidated Application process. Title I, Part A, Title I, Part D, Title II, Part A, Title IV, Title IV Part B, ESSER I - CARES Act, ESSER II - CRRSA Act, ESSER III - ARP Act (subject to a 6-month review process), Neglected and Delinquent and M^cKinney-Vento Education Program Specialists review each application and budget to ensure that expenditures are appropriate for the program area before approving LEA budgets. Once budgets are approved, program specialists track how well LEAs are requesting funds for expenditures to ensure that LEAs are likely to meet the expenditure requirements for each Federal Program.
2. **Single Audit** – LEAs with single audit findings are flagged for technical assistance (see procedures on audit resolution).
3. **On-Site Monitoring** – A GaDOE on-site Cross-Functional Monitoring Team visits the LEA to apply the criteria included in a GaDOE monitoring document.
4. **Self-Monitoring Checklist** – LEAs not receiving an on-site visit complete the Self-Assessment Checklist and submit it to the GaDOE, as requested.

The following procedures are adhered to during the on-site monitoring visit:

- Selection of LEAs to be monitored.
 - LEAs are monitored on a four-year cycle. Approximately one-third of the LEAs are monitored each year.
 - LEAs are initially randomly selected from each of Georgia's service areas.
 - LEAs with audit or monitoring findings requiring a return of monies or receiving a high number of complaints from parents and other stakeholders are monitored within the year of the LEA audit or monitoring report and the written complaint. For example, if an LEA is audited in FY17 for FY16 and the Division receives the report of findings in FY17 before the end of the monitoring cycle, the LEA would be included in the LEAs to receive an on-site monitoring visit. In addition, on-site monitoring outside of the scheduled cycle may be arranged as needed if an LEA substantiates serious or chronic compliance problems.

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

Monitoring of Title I schools is a critical component for ensuring that compliance is taking place at each school. The district Directors/Coordinators for Federal Programs, along with Parent Liaisons, Homeless Liaison, meet with all Title I principals to discuss important changes/regulations learned from attending the June Title conference. Principals receive training on policies and procedures and guidance for operating a Title I program throughout the school year.

Principals are given detailed information of expectations and copies of program guidance. Specific training is provided in all facets for all Title programs. A copy of the Rockdale County School System Federal Programs Policies and Procedures Manual is provided for each Principal and discussed in detail by the Title Directors/Coordinators. This manual includes timelines, budget forms, inventory information,

schoolwide/ targeted assistance implementation, parent and family engagement guidelines, fraud policy, and other areas of Federal Programs as needed.

Monthly meetings are also held with Title I Principals. Title I Principals are given the opportunity to share best practices during these meetings. Phone calls and emails are a daily occurrence between the Federal Programs staff and system staff. School visits also take place throughout the school year.

Monthly subscriptions of “The Parent Institute” newsletters are provided to schools. The newsletters are shared with families in printed form as well as placed on the RCPS Portal under the Parent page. The newsletters keep parents informed and provide ideas to keep engagement and communication open between parents and schools.

In addition to meeting with Principals, Federal Programs staff communicate with bookkeepers and Title I Parent Liaisons throughout the year. These communications are an opportunity to discuss Federal Programs in detail, and an opportunity for the District Title I Parent and Family Engagement Director, Title I Coordinator, Title I Administrative Assistant and Title I Director to discuss content specific information with each of the above.

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

Monitoring and Audit Findings: Reporting and Corrective Action Process

The GaDOE conducts the monitoring of all Federal Programs. The results from the monitoring are posted in the GaDOE portal. The Appropriate Program Manager retrieves and reviews the results of the monitoring from the GaDOE portal and notifies any staff associated with the findings to develop appropriate corrective actions. The Appropriate Program Manager reviews and approves the corrective action responses and responds to the findings in the GaDOE portal. The Superintendent reviews and approves the corrective action response and submits to GaDOE for approval.

The GaDOE accepts the district's responses or requests additional information via email or the GaDOE portal. The GaDOE finalizes and approves all the corrective actions in the GaDOE portal. The appropriate federal program department updates the Policies and Procedures Manual with the new and revised policies and procedures based on the approved corrective actions. The Appropriate Program Manager schedules a meeting with the appropriate federal program department and the appropriate central office staff to review the findings and corrective action. The appropriate Federal Programs grant administrator provides training on new processes. The Appropriate Program Manager ensures that the new policy and procedures that were created to correct an audit finding are being followed. If it is determined that the new procedures are not being implemented fully then one-on-one follow-up occurs to ensure full implementation of the new procedures.

Corrective action from previous monitoring is discussed with principals to assist them in understanding the critical need for compliance in appropriate federal program. In addition, GaDOE monitoring findings from all districts is shared with principals 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 schools have a clear understanding of all expectations of the appropriate federal program. The central office provides technical assistance as a means of ensuring that all schools are in compliance at all times. Ongoing technical assistance trainings are conducted throughout the year on compliance.

The following process is used to facilitate corrective action measures relative to all appropriate Federal Programs:

- The Appropriate Program Manager conduct periodic monitoring of accomplished task based on established timeline to ensure consistency and effectiveness towards completion of the set objectives/goals.
- The Appropriate Program Manager will conduct final review/ evaluation of the completed task.
- The Appropriate Program Manager will provide recommendations/feedback regarding completion of task.
- The Appropriate Program Manager will grant approval based on fulfillment of the required task.

Each federal grant administrator who manages a grant is responsible for developing clear and specific procedures for his/her program area.

RCPS District Monitoring of Schools and Programs

Written Procedures

In 1965, the Congress of the United States passed the Elementary and Secondary Education Act (ESEA), as reauthorized by the Every Student Succeeds Act of 2015 (ESSA) to provide supplemental instructional services to schools where the resident population has a higher-than-average concentration of low-income students.

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

Rockdale County Public Schools Federal Programs Director and Program Coordinators make use of monitoring as a means of regular observation and recording of activities taking place in the system. Critical to this process is the feedback provided to schools that can assist in improving student academic achievement. District monitoring addresses the following:

1. Ensuring that all Federal Program activities are carried out in accordance with federal compliance guidelines (Comprehensive Needs Assessment and District/School Improvement Plans)
2. Equipment usage monitoring
3. Academic monitoring
4. Budgetary monitoring

RCPS monitors the implementation of program requirements and the expenditure of federal funds. The CARES Act grants are included in the monitoring procedures.

1. **Federal Compliance Monitoring** –In addition to school and district Progress Monitoring through SLDS, the RCPS Federal Programs Director and Coordinators provide budget sheets to each school indicating the grant allotment for the school year. Each school submits for approval an annual budget that is aligned to the school’s CLIP/SIP. The Program Director/Coordinators of their respective programs (Title I, Part A, Title I, Part D, Title II, Part A, Title IV, Title IV Part B, ESSER I - CARES Act, ESSER II - CRRSA Act, ESSER III - ARP Act, Neglected and Delinquent and M^cKinney-Vento) reviews each application and budget to ensure that expenditures are appropriate for the program area and aligned to their CLIP/SIP prior to approving budgets. Once budgets are approved, the Program Director/Coordinator will track, on a monthly basis, how well schools are requesting funds for expenditures to ensure that they are likely to meet the expenditure requirements of each Federal Program. Technical Assistance is provided monthly and ongoing throughout the year.

2. **Equipment Monitoring** - Each year, the coordinator of their respective federal program will visit schools to monitor inventories and use of equipment.
3. **Academic Monitoring** – On-site focus walks take place in the fall in the spring to monitor student academics, teaching and learning, compliance with state standards, ongoing and sustained professional development, appropriate use of Title funded site licenses, and to ensure evidence-based learning is taking place. The focus walks include members of the Curriculum Team, the Professional Learning Team, the Federal Programs Team, the Assessment Team, Directors and Coordinators of all Federal Programs and grants, the Chief Academic Officer, Area Assistant Superintendents of their respective schools, the Learning Support Team, the Community and Student Support Team, the Chief Student Support Officer, and others deemed appropriate by school needs. Upon conclusion of monitoring, meetings are scheduled via TEAMS with the appropriate school leadership team and the focus walk team. Glows and grows are discussed in full.

All schools are subject to ongoing monitoring by the Directors/Coordinators of their respective Federal Programs throughout the school year. School principals are made aware of all Title I procedures and are expected to monitor the programs in their schools. Emails, staff meetings, TEAMS meetings, and phone conversations take place throughout the year as a means of providing ongoing support and for monitoring and communicating with each school.

4. **Budgetary Monitoring** - Each month, the Director/Coordinator of each Federal Program and grant will receive the previous month's expenditure report from the grants manager. After verifying expenditures, signing and dating the report, and returning the signed copy to the grants manager, the Program Director/Coordinator will send an expenditure report to each school principal and their respective Area Assistant Superintendent. Schools of concern will be contacted via TEAMS to discuss concerns and, together, make plans for timely expenditure compliance.

The Georgia Department of Education (GaDOE) requires that Rockdale County Public Schools (RCPS) monitors the implementation of all Federal Programs and the expenditure of all funds associated with the program. The specific requirements are as follows:

- Each RCPS Program Grant Administrator will conduct self-monitoring of its schools and programs sufficient to ensure compliance with the appropriate federal program.
- Each RCPS Program Grant Administrator will undergo training from GaDOE and other sources to maintain proficiency in Title I program compliance requirements.
- Each RCPS Program Grant Administrator will provide technical assistance to local schools.
- Each RCPS Program Grant Administrator and RESA staff will conduct achievement data reviews with all schools.
- Each RCPS Program Grant Administrator self-monitoring will include monitoring all program expenditures to verify that all program expenditures comply with the federal program requirements.
- Each RCPS Program Grant Administrator will maintain all documentation LEA may need for future auditing/monitoring according to the LEA Monitoring Form, issued annually by GaDOE.
- When RCPS does not receive an on-site visit, each Program Grant Administrator will complete the self-assessment checklist or use the current Cross-Functional Monitoring Document to serve

as the district's Self-Assessment Checklist. This checklist will be submitted to the Georgia Department of Education (GaDOE) upon request.

Timeline for Monitoring of Title I Schools

- July: Start-up meeting for Principals of all Title I Schools following the June state Title Programs Conference/training to update them on any new guidelines and to provide guidance for “new” Title I Principals.

Provide Technical assistance including, but not limited to, the following topics:

- Budgets
 - Ordering
 - Compliance Issues
 - Parent and Family Engagement
 - Schoolwide/Targeted Assistance
 - Monitoring
 - Academic Achievement
 - Instructional Specialists/Title I Teachers/Paraprofessionals Scheduling
 - Ethics/Fraud/Compliance
 - M^cKinney-Vento/Foster Care
 - Inventory
 - Programmatic and Financial Information
 - Neglected and Delinquent
- **First Week of School:** Mandatory student/parent handbook information is sent home to all parents including parents “Right to Know” information. Parent’s Right to Know Letter is distributed in several ways to all parents.
 - **August:** The Homeless/Foster Care Liaison contacts every school to update the system’s homeless/Foster Care list and to consult with staff regarding the needs of Homeless/Foster Care students in our non-Title I schools. The Liaison also makes sure that every school has up-to-date homeless contact information posted. The Title I Coordinator provides Principals with a checklist of items due at the end of August.
 - **August-September:** Title I Coordinator and Title I Administrative Assistant review each Title I School-Parent Compact and School Parent and Family Engagement Plan, using the checklists provided by the GaDOE. The Title I Coordinator and/or Title I Administrative Assistant provides feedback to Principals before final copies are printed. Final copies of School-Parent Compacts and School Parent and Family Engagement Plans are shared with families before the end of October.
 - **August-September:** Principals present their Comprehensive Needs Assessment and their School Improvement Plans to the Title I Director. Within a week of receipt, plans/budgets are reviewed to ensure that funds are being spent according to the Improvement Plan and the Plan has all the necessary components. Once plans/budgets are approved, budgets are sent to the Director of Finance for set up and release of funds.
 - **August-June:** Inventory all items purchased by Federal Programs. The Title I Coordinator will conduct each **building’s** inventory every year.
 - **August-June:** The Homeless and Foster Care programs are monitored by the Director of Community & Student Support. The N & D Facilities are monitored by the Federal Programs Director and Title I Coordinator and/or Title I Administrative Assistant.

- **September:** Title I Coordinator and/or Title I Administrative Assistant and any new Parent Liaisons attend training.
- **September-November:** Annual Surveys of Children in Institutions for Neglected and Delinquent.
- **September-May:** Central Leadership participates in walk-through monitoring at each school in the district. Focus walks are scheduled and unannounced observations to monitor implementation of system initiatives, system and/or Title I-A and Title II-A funded professional learning implementation and school improvement plan strategies. The Directors/Coordinators of Federal Programs are members of the focus walk team. Federal Programs staff members also visit schools and N&D facilities to offer support and monitor implementation of resources.
- **October:** Initial Consultation meeting is held with interested private schools to review information of equitable services for the next school year.
- **October-November:** Title I Coordinator and/or Title I Administrative Assistant work with the Director of Parent and Family Engagement and the Department of Community and Student Support to plan activities for the annual Parent Academy to promote stronger family engagement.
- **January:** Completion of first semester Periodic Certifications.
- **January:** Completion of first semester Progress Monitoring in SLDS for District and each school by the January 31 deadline.
- **January-February:** Federal Programs Director and Title I Coordinator attend the ESEA Conference either virtually or in person.
- **February-March:** Directors/Coordinators of Federal Programs and staff attend GCEL conference. (Unavailable in 2022 and 2023. Unsure about the future of GCEL.)
- **February-March:** Proposed federal program budgets are provided to school principals to begin planning for the next school year. (Budgets are subject to change based on official allotments.)
- **March-May:** Surveys are completed by various stakeholders (parents, teachers, students, administrators, and community members) to provide needs assessment data for improvement planning. The Title I Department sends the Annual Survey of Parent and Family Engagement to parents to provide information as a means of gauging the effectiveness of parent and family engagement activities. The Director of Parent and Family Engagement and Parent Liaisons compile data to determine the needs for the following year.
- **March-May:** Inventory of all equipment purchased with Title I funds is conducted at each Title I school by the Title I Coordinator and/or Title I Administrative Assistant.
- **March- June:** Begin meeting and working with stakeholders to revise the district CLIP/SIP by the GaDOE deadline (June 30).
- **April-May:** Homeless surveys are completed.
- **April-May:** The Federal Programs Director, Title II, Part A Director, along with the Chief Human Resources Officer, compile needs assessment data to be used in the revision of the Equity Plan.

- **May-June:** Completion of second semester Periodic Certifications.
- **June:** Completion of second semester Progress Monitoring in SLDS for District and each school by the June 30 deadline.
- **May-August:** Schools and district use summative test results, parent survey results, and other needs assessment data to revise their Schoolwide and/or School Improvement Plans. Schools involve various stakeholders in the analysis of this data and in the planning for the upcoming year. (School CLIP/SIPs are due to Federal Programs Director by August 30.)
- **Ongoing:** Periodic certifications required from employees who are not federally funded on a regular basis (subs, stipend recipients, tutors, bus drivers, employees used for student support, etc.) are collected monthly with their payroll documentation.
- **Ongoing:** Review of comprehensive needs assessment and school improvement data and plans in conjunction with other central office staff.
- **Ongoing:** The Title I Coordinator, Title I Administrative Assistant, and Director of Community, Family and Student Engagement hold meetings with the Parent Liaisons and the Parent Advisory Council.
- **Ongoing:** Budgets and purchase orders are reviewed monthly by the Directors/Coordinators of Federal Programs to assist schools in spending the funds as planned.
- **Ongoing:** The Directors/Coordinators of Federal Programs and staff provide technical assistance and meet regularly with Principals.

The Comprehensive Needs Assessment (CNA) is monitored by the Federal Programs Director, Title I Coordinator, and other federal program administrators and team members. The GaDOE Schoolwide Program Checklist is used as a means of guaranteeing that all components are included in each school's CNA and SIP. The Federal Programs Director, Title I Coordinator, and other Title Coordinators and department members provide personal contact to work with each school's Title I team when providing feedback/revisions necessary for plan improvement. This process continues until all plans are approved.

School Improvement Plans (SIPs) include data which drives student achievement and are monitored by the Federal Programs Director, Title I Coordinator, Directors/Coordinators for all other Federal Programs, and the Curriculum and Instruction teams. Based on continuous data analysis, Principals and leadership teams make changes to their school improvement plans through data talks as needs arise. While the focus remains on the original needs, continuous needs are also taken into consideration and modifications are made on an as-needed basis. School focus walks take place two times per year: once in the fall, and again in the second semester. The focus walk team meets with school principals and their administrative team to discuss glows and grows and to share information about how the school teams are succeeding with their school improvement plans/goals or what changes may be needed to succeed with their plans.

Corrective Actions from School Visits for Onsite Review

Corrective actions from monitoring visits are discussed with Principals to assist them in understanding the critical need for Federal Program compliance. Professional learning is provided based on needs. Professional learning is used as a preventive measure to ensure that all Title I personnel have a clear understanding of all expectations for every facet of the Title I Program. The Title I Director and other district staff (including other Federal Programs Directors/Coordinators) provide on-going training as a means of ensuring that all Title I staff are in compliance at all times. Upon completion of onsite visits, the Title I staff documents the areas that require completion and/or correction and provide detailed reports to

school Principals, clearly articulating required actions with due dates. The RCPS Assistant Superintendents for Elementary and Middle School Accountability are included in these actions.

Review and Approval of School CLIP/SIPs

- Principals/designees submit plans in SLDS by the provided deadline.
- Title I Director and Title I Coordinator review plans and provide input as needed.
- If corrective action is needed, the specific actions are discussed, examples are provided, and plans are returned for revision with a deadline date.
- Revised plans are submitted to the Title I Director or Title I Coordinator by the provided deadline.
- Revised plans are reviewed, and the process is repeated until all plans are complete.

Approval of Targeted Assistance Plans are done in the same manner as the CNA and SIP. Feedback is sent to each Principal based on the GaDOE Targeted Assistance Program Checklist. Corrections to the plans are made as needed by Principals and updated copies are sent to the Title I Office. A CNA is required by schools operating a Targeted Assistance Program, but the SIP is not required at this time since improvement is based on multiple targeted criteria and students who meet those criteria. The TA Plan is used to identify the educational criteria used to identify the students and how the needs of the targeted students will be met. Feedback is provided by the Title I Director to ensure the plans address the required components.

Documentation Maintained to Verify Program Monitoring

- LEA checklist for completing the ConApp
- Eligible Attendance Area Worksheet for Title I, Part A
- Schoolwide Program checklist
- Budget Allocation Sheet for School Principals
- Drawdown Reports
- Requisition Approvals
- Travel Statements
- Inventory Spreadsheets
- Suspension/Debarment Records
- Tutoring Program Documentation
- Periodic Certification forms
- Parent and Family Engagement Distribution checklist
- Parent and Family Engagement Input checklist
- Checklist for Building Capacity of Parents
- Checklist for Building Capacity of Staff
- District Title I Yearly Obligations checklist
- District Parent and Family Engagement Obligations checklist
- Monthly payroll report of federal funded employees
- Monthly budget expenditure reports for each federal program
- Monthly budget expenditure reports for each Title I school
- Documentation of focus walks and necessary program adjustments needing to be made at the individual schools
- Effectiveness measures for all federal programs
- Email communication

- Agendas, minutes, and attendance of monthly principal meetings
- Agendas, minutes attendance, and feedback of effectiveness for all professional learning
- Agendas, minutes, and attendance of bi-monthly parent liaison meetings
- Agendas, minutes, and attendance of monthly Federal Programs budget meeting
- CLIP/SIP Progress Monitoring of programs for District and each school

Process for Working with Schools

The Federal Programs Director and Title I Coordinator work in unison with the Assistant Superintendents for School Accountability, the Director of Teaching and Learning, and Directors/Coordinators from other Federal Programs to ensure that all ESSA requirements are met as well as all requirements for specific programs. Ongoing technical assistance is provided to all principals and school bookkeepers as questions arise regarding Federal Programs. Meetings are held monthly with principals to determine where school are with meeting their needs and providing evidence-based, pre-approved services for students. Participating Private Schools are included in the process.

Monitoring of Neglected & Delinquent Facilities

There is one facility for neglected students in Rockdale County: Elks Aidmore Children Center. The Annual Survey of Local Residential Childcare Institutions is completed each year for this facility. Budget consultations and physical inventories are also completed annually. The Federal Programs Director contact the facility director and staff monthly to determine how needs are being met and if any changes need to take place.

Monitoring of Private Schools

Private schools will be monitored by the Federal Programs Director, Title I Coordinator, and Director/Coordinator of any other Federal Programs in which private schools participate. Invitations for private school consultation meetings for schools interested in participating in equitable services of Federal Programs the following calendar year are sent via the ES4PS platform. A meeting is held in October to present information about the programs available for private schools/students.

Private schools are monitored by the Director or Coordinator of the Federal Program in which they are participating. The appropriate Federal Program Director/Coordinator is available to provide support and guidance on a daily, as needed basis. Monthly meetings are held to determine where private schools are in terms of meeting the identified needs of the targeted students and use of funds. Discussions include any changes needed if current plans are not meeting the students' needs and if changes need to be made with the students being served.

Monitoring Use of Funds

The Director/Coordinator of each Federal Program will meet with schools monthly to review and provide recommendations for budgeting decisions. School principals provide timelines as to when the funds will be expended if they are not in line with the expected usage at the time of the meeting. If there is a concern about a school not expending their funds as expected, the Assistant Superintendent over the particular school is included in the meeting so plans can be made to ensure expected expenditure of funds.

Monitoring of Title III, Part A

The Title III, Part A program in Rockdale County Public Schools makes use of monitoring as a means of regular observation and recording of activities taking place in participating schools. Critical to this process is the feedback provided to the district that can assist in improving academic achievement of English Learners. District level monitoring of the Title III, Part A program addresses the following:

- Ensuring that all Title III, Part A funded activities are carried out in accordance with federal compliance guidelines

- Monitoring Title III, Part A funded inventory and equipment usage
- Attainment of academic achievement school improvement goals for Title III, Part A served students
- Compliance with Title III, Part A budgetary guidelines

Frequency of Monitoring for Title III, Part A Programs (Timeline)

June-September – RCPS Title III, Part A Coordinator attends the GaDOE Federal Programs Conference to obtain updated information on any new guidelines and schedules sessions to provide guidance for other RCPS personnel involved in Title III, Part A programs on topics including the following: budget, compliance, parental involvement, professional learning, meeting the needs of students, schoolwide programs, monitoring, academic achievement, inventory, scheduling, ethics, fraud and waste, and complaint procedures.

June/July - Title III, Part A Coordinator will meet with principals and assistant principals to determine priorities for English Learners at each school. Title III, Part A Coordinator will collaborate with other Federal Programs Coordinators to review and revise district Comprehensive Needs Assessment to ensure alignment with priority needs for English Learners.

July/August – Title III, Part A Coordinator will assist schools with creating and mailing any required notifications to parents.

August to June – Meet at least quarterly with RCPS personnel involved with Title III, Part A programs, including teachers of English Learners. Provide additional training as needed.

August to December – Inventory items purchased with federal funds.

August to June – Title III, Part A Coordinator maintains ongoing monitoring of all Title III, Part A programs and expenses. Ongoing review of school improvement data and plans in conjunction with members of the Teaching & Learning Department.

February/March – Title III, Part A Coordinator attends GCEL conference.

Ongoing – Title III, Part A budget is reviewed at least monthly. Each Title III, Part A-funded purchase order is examined by Title III, Part A Coordinator to ensure purchases are allocable, reasonable, and necessary and that items purchased are supporting strategies contained in the system and/or school improvement plans.

February/March – Conduct annual comprehensive needs assessment. Data is provided to system and school leaders so each can compile data to determine prioritized needs for the following year.

Ongoing – Title III, Part A Coordinator provides technical assistance and meets regularly with RCPS personnel involved in Title III, Part A programs.

Corrective Action Process for Audit/Monitoring Findings

During training, corrective actions from previous monitorings are shared with Principals to assist them in understanding the critical need for compliance in Federal Programs. As corrective actions are identified, principals are notified immediately, along with their respective Assistant Superintendent, and an explanation is provided as to why the corrective action has been given, why it is a violation, ideas as to how to rectify the situation, and direct one-on-one training is provided to resolve the corrective action and prevent it from happening again. In addition, past GaDOE monitoring findings are shared with Principals as a means of understanding the impact of non-compliance. Technical assistance is provided to principals based on need and is used as a preventive measure to ensure that all staff has a clear understanding of all

expectations of every facet of Federal Programs. The Directors/Coordinators of all Federal Programs, along with district level staff, and, where applicable, outside consultants, provide ongoing training as a means of ensuring that all staff are complying at all times. Training is conducted throughout the year that relates directly to all facets of Federal Programs compliance.

Resolution of Audit and Cross-Functional Monitoring Findings

RCPS makes an ongoing effort to comply with all Federal Programs requirements. The Federal Programs Office makes a continuous effort to cooperate with state and federal auditors and monitors. All corrective actions through the audit process or cross-functional monitoring findings are fully implemented. School principals are provided with clear, written guidance to ensure compliance with audit and monitoring concerns at the school level. School budgets are monitored using school CLIP/SIPs, which are only approved once they are completely aligned, to ensure that expenditures are part of the CNA and SIPs. Requisitions to expend funds that are not listed in the CLIP/SIP are not approved.

Steps to Audit/Monitoring Resolutions

Once the audit/cross-functional monitoring report is received, the Title I Director will review all items.

- The cross-functional monitoring report will be pulled from the GaDOE website under the consolidated application.
- Each item will be examined carefully, and a team of district-level staff will determine the best means of corrective action.
- Information is gathered and a report is written by the Title I Director or the appropriate Director/Coordinator for the program in correction action.
- The report is submitted to the RCPS Superintendent for approval.
- Once approved, the completed report is then uploaded to the GaDOE portal or state auditors as a means of resolution.
- The district has thirty (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.

Identification of High-Risk Schools

Schools in Rockdale County are monitored yearly based on Milestones performance, student growth, CCRPI, gaps analysis, turnover, graduation rates, and parent and community input. Comprehensive Support and Improvement (CSI) schools and Targeted Support and Improvement (TSI) schools are identified at the state level. RCPS goes beyond those flagged by the state to include more real-time data analysis to allow for immediate interventions. Schools identified as high risk by Rockdale County are those who show declines in the above-mentioned areas. Schools are prioritized based on those that are currently on the GaDOE list, those currently below a 70 CCRPI score, or if their trend data puts them at risk of falling below a 70 CCRPI score.

Indicator 2: (CLIP) and Schoolwide/Targeted Assistance Plans

Sec. 8305 of the Elementary and Secondary Education Act of 1965 (ESEA) as reauthorized by the Every Student Succeeds Act of 2015 (ESSA) specifies that LEAs may receive funds under ESSA if the LEA has an approved plan on file with GaDOE. The LEA plan is submitted as part of a Consolidated Application. The CLIP has five major components: The District's Comprehensive Needs Assessment, District's Improvement Plan, Parent and Family Engagement Policy, Foster Care Transportation Plan and the Migrant, Title IC ID&R Plan (if applicable). The following programs are a part of the CLIP:

- Title I, Part A – Improving the Academic Achievement of the Disadvantaged

- 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 A and Title I, Part D – Programs for Neglected and Delinquent Children
- Title II, Part A – Supporting Effective Instruction
- Title III, Part A – Language Instruction for English Learners and Immigrant Students
- Title IV, Part A – Student Support and Academic Enrichment
- Title V, Part B – Rural Education Achievement Programs (REAP)
- Individuals with Disabilities Education Act (IDEA) – Programs for Exceptional Students
- Title I, Part A and Title IX, Part A McKinney-Vento Education of for Homeless Children and Youth (EHCY)

Written Procedures for Updating the RCPS Comprehensive Plan

The RCPS Comprehensive Improvement Plan is updated annually. All stakeholders are requested to participate in the planning, revision, and implementation process (Comprehensive Needs Assessment and District Improvement Plan). Parents, students, partners in education, and business leaders in the community are invited to serve on the revision committee. Title I parents are sent information inviting them to participate via email, flyers, website, and newsletters. Parents are asked to provide written input during this process.

The district conducts surveys each year that allow parents to provide input. The Title I Director collects and analyzes the data from these surveys. From the results, the CLIP may be revised. Parent input is examined and considered from these surveys via input from review meetings.

Documentation includes, but is not limited to sign-in sheets, agendas, meeting minutes, emails, and returned plans with comments. Copies of comments are kept on file and put in meeting minutes.

The Directors/Coordinators of Federal Programs gather all input and provide updates to the consolidated application. The plan is submitted to the Superintendent for final approval.

Process for Updating the RCPS Comprehensive Plan

Rockdale County Public Schools (RCPS) revises the Comprehensive LEA Improvement Plan (CLIP) annually. The plan is evaluated by multiple stakeholders, through virtual and/or face-to-face meetings, and updated to reflect the current needs, priorities and initiatives that have been identified. RCPS uses student achievement data from local, state and national assessments as the basis for the CLIP. Various other indicators are also used such as, SAT, Iowa Assessments, STAR data, student performance data, district assessments, student, teacher, and parent surveys, input/concerns provided during the various Superintendent’s Advisory Meetings with students, teachers, leaders, parents, and community members. The district sets instructional priorities, organizes, aligns programs, and provides professional development based upon the needs assessment of the district. The CLIP is adjusted to reflect the identified needs. Adjustments to professional development and instructional programs are made that are in the best interest of our entire student body, that are evidence based, and proven programs. Stakeholder input is included in this process. The Federal Programs Director provides training and requests input from the stakeholders. After the process has taken place and all information has been gathered, the plan is updated to reflect the needs and the amended CLIP and is provided, once again, to all stakeholders for final review. After final review, and if no other revisions are necessary, the CLIP is provided to the Superintendent for approval. After review by the GaDOE CLIP/SIP review team, any corrective actions required by the state are made.

Steps for Updating the RCPS CLIP

The first step in the process is to invite all federal program grant administrators, curriculum leaders, professional development leaders, HR leaders, and other appropriate central office staff to participate in the GaDOE CLIP webinar that begins in February. All Directors and appropriate central office staff are required to participate in the analyzing, planning, revision, and implementation process of the CLIP. Additionally, parents, students, schools, and business leaders are also asked to attend the District Strategic Planning Meeting and Annual Stakeholders Revision and Development Meetings. All stakeholders are sent information inviting them to participate via mail, email, telephone, flyers, website, and/or newsletters. All stakeholders are asked to provide written input during this process. Stakeholders who are unable to attend the Revision and Development Meeting may provide feedback online.

The district conducts an annual survey each year that allows parents to provide input on district policies and procedures. The Director of Community, Family and Student Engagement oversees this survey and provides results to the district to update the CLIP. Stakeholders' input is examined and considered from these surveys.

Documentation includes sign-in sheets, agendas, meeting minutes, emails, and returned plans with comments. Copies of comments are kept on file in the Office of Federal Programs. Appropriate central office Directors gather all input and update the CLIP. The CLIP is submitted to the District Superintendent for final review and approval before being sent to GaDOE.

Procedures for Selecting Evidence-Based Interventions

During the creation/revision of the CLIP, the district identifies strengths and needs. From these strengths and needs, evidence-based interventions are selected to meet those needs based on one of the four evidence types:

- Strong Evidence – Supported by at least one randomized study
- Moderate Evidence – Supported by at least one quasi-experimental study
- Promising Evidence – Supported by at least one correlational study
- Demonstrates a Rationale – Supported by programs with a rationale based on high quality ESSA research or a positive evaluation that are likely to improve student or other relevant outcomes and that are undergoing evaluation; supported by a logic model

The district uses one of the databases that have been developed to assist LEAs with identifying evidence-based interventions. If the initiative is not on one of the databases or supported by a strong, moderate, or promising study, the district develops a logic model for that initiative for the purpose of demonstrating a rationale for the initiative. Data is collected on the initiatives.

RCPS CLIP Review Timeline

August – May

RCPS Central Office Administrators, who are responsible for updating the Comprehensive LEA Improvement Plan (CLIP), will work with all stakeholders to gain input for revisions and/or updates. The following stakeholder groups will participate in reviewing and revising the CLIP: Central Office Staff, Principals, school staff, parents and community members. Central Office Administrators will need to schedule meetings with the stakeholders as appropriate. Suggested meetings to get CLIP input:

- Superintendent's Teacher Advisory Meetings
- Superintendent's Parent Advisory Meetings
- Superintendent's Community Advisory Meetings
- Superintendent's Student Advisory Meetings
- Superintendent's Executive Cabinet Meetings

- Superintendent’s Leadership Cabinet Meetings
- Principal’s Meetings
- Parent Academy
- Parent and Community Involvement Feedback Meetings
- Director’s Meetings
- District Strategic Planning Meetings
- School level PLC meetings with faculty and staff
- Data talks with school leadership teams
- Focus Walks
- CLIP meetings with stakeholders
- CLIP posted on RCPS website with requests for feedback
- Teaching and Learning 3-day summit focused on data analysis and needs assessments.

May – June

Meetings are held with all Central Office Administrators to discuss the feedback gained. Each Program Director/Coordinator will make the needed adjustments to the master CLIP document no later than a June deadline that is specified by the Federal Programs Director, updating each CLIP indicator that applies to their program area. Each central office Director/Coordinator will maintain documentation (agenda and sign in sheets that include the position of people attending) from the meetings.

June (By required deadline)

The Federal Programs Director will upload CLIP in the ConApp for approval from GaDOE by the GaDOE specified deadline. If adjustments and/or corrections are needed, the Federal Programs Director will contact the appropriate Program Director/Coordinator and resubmit the CLIP immediately after revisions.

Resolution for Unapproved Schoolwide Plans

School improvement plans are maintained on SLDS. Copies are provided to all stakeholders to allow for opportunities to collaborate. If the plan needs revisions, comments are placed on the plan. Once all comments have been resolved satisfactorily, the plan is modified in SLDS and monitored by the Title I Department. Once complete the Title I Director uses the Technical Assistance Form and the Checklist to ensure the school plans meet their requirements. If the plans need revisions, they are sent back to the school principal for revisions. This process continues until all plans are approved.

Assurances

Sec. 8306 of the Elementary and Secondary Education Act of 1965 (ESEA) as amended by the Every Student Success Act of 2015 (ESSA) requires that RCPS shall have on file with the state educational agency a single set of assurances, applicable to each program for which a plan or application is submitted. RCPS will acknowledge general assurances addressing all Federal Programs and specific program assurances where an allocation is received. This acknowledgement occurs on the My GaDOE Portal annually (<https://portal.doe.k12.ga.us/login.aspx>). The Superintendent’s sign-off on the consolidated application denotes agreement to each assurance.

The assurances are as follows:

General Assurances	<p>As a condition of receiving the federal funds for which application is made in this Consolidated Application, the RCPS local board of education assures the following:</p> <ol style="list-style-type: none"> 1. Each such program will be administered in accordance with all applicable statutes, regulations, program plans, and applications; 2. The control of funds provided under each such program and title to property acquired with program funds will be in a public agency or in
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	<p>an eligible private agency, institution, organization, or Indian tribe, if the law authorizing the program provides for assistance to those entities;</p> <ol style="list-style-type: none"> 3. The public agency, eligible private agency, institution, or organization, or the Indian tribe will administer the funds and property to the extent required by the authorizing statutes; 4. The applicant will adopt and use proper methods of administering each such program, including— <ol style="list-style-type: none"> a. the enforcement of any obligations imposed by law on agencies, institutions, organizations, and other recipients responsible for carrying out each program; and b. the correction of deficiencies in program operations that are identified through audits, monitoring, or evaluation; and c. ensuring interventions purchased with federal funds are evidence-based. 5. The applicant will cooperate in carrying out any evaluation of each such program conducted by or for the State educational agency, the Secretary, or other Federal officials; 6. The applicant will use such fiscal control and fund accounting procedures as will ensure proper disbursement of, and accounting for, Federal funds paid to the applicant under each such program; and 7. The applicant will— <ol style="list-style-type: none"> a. the submit such reports to the State educational agency (which shall make the reports available to the Governor) and the Secretary as the State educational agency and Secretary may require to enable the State educational agency and the Secretary to perform their duties under each such program; b. maintain such records, provide such information, and afford such access to the records as the State educational agency (after consultation with the Governor) or the Secretary may reasonably require to carry out the State educational agency’s or the Secretary’s duties; and c. before the application was submitted, the applicant afforded a reasonable opportunity for public comment on the application and considered such comment.
<p>Title I, Part A – Improving the Academic Achievement of the Disadvantaged</p>	<p>In General – RCPS shall provide assurances that we will;</p> <ol style="list-style-type: none"> 1. Participate, if selected, in the State National Assessment of Education Progress in 4th and 8th grade reading and mathematics carried out under Section 411(b)(2) of the National Education Statistics Act of 1994; 2. Inform eligible schools and parents of schoolwide program authority and the ability of such schools to consolidate funds from federal, state, and local sources; 3. Provide technical assistance and support to schoolwide programs; 4. Work in consultation with schools as the schools develop the school’s schoolwide plans pursuant to Section 1114; 5. Under Section 1115, provide an accelerated, high-quality curriculum minimizing the removal of children from the regular classroom during regular school hours for instruction provided under this part; and on an ongoing basis, review the progress of eligible children and revise the targeted assistance program under this section, if necessary, to provide additional assistance to enable such children to meet the challenging State academic standards.

6. Provide services to eligible children attending private elementary schools and secondary schools in accordance with Section 1117, and timely and meaningful consultation with private school officials regarding such services;
7. Develop, review, and revise an LEA homeless policy to remove barriers to the enrollment and retention of children and youth in homeless situations;
8. Ensure that all teachers and paraprofessionals working in a program supported with funds under this part meet applicable State certification and licensure requirements, including any requirements for certification obtained through alternative routes to certification; and
9. In the case of a local educational agency that chooses to use funds under this part to provide early childhood education services to low-income children below the age of compulsory school attendance, ensure that such services comply with the performance standards established under section 641A(a) of the Head Start Act (42 U.S.C. 9836a(a)).
10. Take into account the experience of model programs for the educationally disadvantaged, and the findings of relevant effectiveness-based research indicating that services may be most effective if focused on students in the earliest grades at schools that receive funds under this part;
11. Work in consultation with schools as the schools develop and implement their plans or activities under Sections 1118 and 1119;
12. Coordinate and collaborate, to the extent feasible and necessary as determined by the local educational agency, with the state educational agency and other agencies providing services to children, youth, and families if a school requests assistance from the local educational agency in addressing major factors that have significantly affected student achievement at the school;
13. Ensure, through incentives for voluntary transfers, the provision of professional development, recruitment programs, or other effective strategies, that low-income students and minority students are not taught at higher rates than other students by unqualified, out-of-field, or inexperienced teachers.
14. Use the results of the student academic assessments required under Section 1111(b)(3), and other measures or indicators available to the agency, to review annually the progress of each school served by agency and receiving funds under this part to determine whether all of the schools are making the progress necessary to address low academic achievement and achievement gaps;
15. Ensure that the results from the academic assessments required under Section 1111(b)(3) will be provided to parents and teachers as soon as is practicably possible after the test is taken, in an understandable and uniform format and, to the extent practicable, provided in a language that the parents can understand;
16. Assist each school served by the agency and assisted under this part in developing or identifying examples of high-quality, effective curricula consistent with Section 1111(b)(8)(D);
17. Include the use of the U. S. Department of Education’s Migrant Student Information Exchange (MSIX) website in new migrant student records transfer, enrollment and grade/course placement protocols; it will use the Title I, Part C - Migrant Education Program occupational

	<p>survey for all students during new school year registration for returning students and new student registration during the school year;</p> <ol style="list-style-type: none"> 18. Ensure the annual assessment of English language proficiency in the four language domains of all English learners. [Section 1111 (b)(2)(G)]; 19. Shall notify the parents of each student attending any school receiving funds under this part that the parents may request information regarding the professional qualifications of the student’s classroom teacher(s);and 20. Ensure that all initiatives funded with Title I, Part A are aligned with District’s CLIP and/or school SWP/TA plans and that the district is employing only evidenced-based interventions or working to collect evidence of evidence-based effectiveness for all Title I funded interventions; 21. Ensure that it will collaborate with the GaDOE to address participation of students with disabilities in the Georgia Alternate Assessment (GAA) and 1) review local policies, procedures, and practices to ensure these are in accordance with state GAA participation guidelines, and 2) review local GAA participation data and address any student subgroup disproportionality issues; and 22. Ensure it will annually submit a written equity plan that seeks to reduce identified equity gaps impacting poor and minority children.
<p>Title I, Part C – Education of Migratory Children</p>	<p>RCPS assures the Georgia Department of Education that it will keep such records and provide such information to the state education agency (SEA) as may be required for fiscal audit, program review, and program evaluation, consistent with the responsibilities of the SEA under the Elementary and Secondary Education Act as reauthorized by the Every Student Succeeds Act (ESSA) of 2015. RCPS assures the Georgia Department of Education that:</p> <ol style="list-style-type: none"> 1. in the planning and carrying out of services with funds received under this part, it will dedicate sufficient program funding, personnel, and resources to ensure the full and appropriate identification and recruitment (ID&R) of all children eligible for program support and services residing within the district, including pre-school children (age 3-5 yrs. old) and out-of-school youth (up to age 21) during the regular school year and summer, and that these activities will comply with the eligibility and ID & R requirements, including the use of the occupational survey during new school year registration for returning students and new student registration during the school year, as defined by the state and in sections 1115(b)(1)(A) and 1309; 2. the unique educational needs of migratory children, including pre-school migratory children and out-of-school youth to age 21, will be identified and addressed through a comprehensive plan for needs assessment and service delivery during the regular school year and summer that meets the requirements of Section 1306; 3. it will take steps to provide all migratory children with the opportunity to meet the same challenging state academic content standards and challenging state student academic achievement standards that all children are expected to meet; 4. it will provide for educational continuity through the timely transfer of pertinent school records, including information on health, when children move from one school to another;

	<ol style="list-style-type: none"> 5. it will include the use of the U. S. Department of Education’s Migrant Student Information Exchange (MSIX) website in new migrant student records transfer, enrollment and grade/course placement protocols; 6. the funds received under this part will be used only for programs and projects, including the acquisition of equipment, in accordance with section 1306(b)(1); 7. it will coordinate such programs and projects with similar programs and projects within the state and other states, as well as with other Federal Programs that can benefit migratory children and their families; 8. programs and projects will be carried out in a manner consistent with the objectives of sections 1114, except that the special educational needs of migratory children are met before using any funds under this part for school wide programs; subsections (b) and (d) of section 1115; section 1120; and subsections (b) and (c) of section 1120A; and Part F; 9. in the planning and operation of the program, there will be appropriate consultation with parent advisory councils, in a format and language understandable to the parents, for programs of one school year in duration, and that all such programs and projects will be carried out, to the extent feasible, in a manner consistent with section 1118; 10. in the planning and carrying out of services, there will be adequate provision for addressing the unmet educational needs of pre-school migratory children (age 3-5 yrs old) and out-of-school youth (up to age 21) who have not graduated or received a GED; 11. the effectiveness of such programs and projects will be determined using both the SEA’s Title I, Part C Implementation Plan (IP) evaluation procedures and, where feasible, the same approaches and standards that will be used to assess the performance of students, schools, and LEAs under part A; 12. to the extent feasible, services will include – (1) advocacy and outreach activities for migratory children and their families, including informing such children and families of, or helping such children and families gain access to, other education, health, nutrition, and social services; (2) professional development programs, including mentoring, for teachers and other program personnel; (3) family literacy programs, including such programs that use models developed under Even Start; (4) the integration of information technology into educational and related programs; and (5) services to facilitate the transition of secondary school students to postsecondary education or employment; 13. all activities and services will address required activities and are supplementary and do not supplant existing state and locally funded activities and required services; 14. in providing services with funds received under this part, projects will give priority, as defined by the state to migratory children who have made a qualifying move within the previous 1-year period and who— (1) are failing, or most at risk of failing, to meet the challenging State academic standards; or (2) have dropped out of school; 15. it will adhere to the Migrant Education Program (MEP) data collection and reporting requirements as outlined in the Georgia Migrant Education Program Identification, Recruitment, and Data Reporting Handbook including due dates, data verifications, and training; and
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	16. all activities and services will abide by the General Education Provisions Act (GEPA).
Title I, Part D, Subpart 1 – State Agency Programs and Title I, Part D, Subpart 2 – Local Educational Agency Programs	<p>In General – Each state agency receiving Title I, Part D, Subpart 1 funding and local educational agency (LEA) receiving Title I, Part D, Subpart 2 funding shall provide assurances that it will:</p> <ol style="list-style-type: none"> 1. Give priority to children and youth in adult correctional institutions who are likely to complete incarceration within a 2-year period; 2. Assist in locating alternative programs through which students can continue their education if the students are not returning to school after leaving the correctional facility or institution for neglected or delinquent children and youth; 3. Work with parents to secure parents’ assistance in improving the educational achievement of their children and youth and preventing their children’s and youth’s further involvement in delinquent activities; 4. Work with children and youth with disabilities in order to meet an existing individualized education program and an assurance that the agency will notify the child’s or youth’s local school if the child or youth; 5. Is identified as in need of special education services while the child or youth is in the correctional facility or institution for neglected or delinquent children and youth; 6. Intends to return to the local school; 7. Work with children and youth who dropped out of school before entering the correctional facility or institution for neglected or delinquent children and youth to encourage the children and youth to reenter school and attain a regular high school diploma once the term of the incarceration is completed or provide the child or youth with the skills necessary to gain employment, continue the education of the child or youth, or attain a regular high school diploma or its recognized equivalent if the child or youth does not intend to return to school; 8. Ensure that teachers and other qualified staff are trained to work with children and youth with disabilities and other students with special needs taking into consideration the unique needs of such students; 9. Coordinate with any programs operated under the Juvenile Justice and Delinquency Prevention Act of 1974 (42 U.S.C. 5601 et seq.) or other comparable programs, if applicable; 10. Ensure that an annual performance and fiscal report is submitted for each year grant funds are received; and 11. Ensure that all data requests from the Georgia Department of Education and any entity acting on the behalf of the Georgia Department of Education are accurately and promptly reported.
Title II, Part A – Supporting Effective Instruction	<p>In General – RCPS provides assurances that it will:</p> <ol style="list-style-type: none"> 1. Comply with section 8501 (regarding participation by private school children and teachers). [ESSA Sec. 2102(b)(2)(E)] 2. Coordinate professional development activities authorized under this part with professional development activities provided through other Federal, State, and local programs. [ESSA Sec. 2102(b)(2)(F)]
Title IX, Part A - Education for	<p>In General – Each local educational agency receiving Title IX, Part A funding as amended by the Every Student Succeeds Act shall provide assurances that it will:</p>

<p>Homeless Children and Youth</p>	<ol style="list-style-type: none"> 1. Collect and promptly provide data requested by the State Coordinator pursuant to paragraphs (1) and (3) of Sec. 722(f); 2. Meet the requirements of Sec. 722(g)(3); 3. Provide access to educational and other services to ensure homeless children and youth have the opportunity to meet the same challenging state performance standards to which other students are held; 4. Review and revise policies that may act as barriers to the enrollment of homeless children and youth in the school, including policies related to transportation, immunization, proof of residency, birth certificates, guardianship, school records, and other documentation; 5. Determine the particular school that is in the best interest of a child to attend with compliance to the wishes of the parent(s), to the extent feasible; 6. Provide transportation to the school deemed in the best interest of the child; 7. Ensure that all homeless children and youth receive free meals, textbooks, and Title I services; 8. Ensure the enrollment and attendance of homeless children and youth who are not currently attending school; 9. Coordinate with local social services agencies and other agencies or programs providing services to homeless children or youth and their families to minimize educational disruption for children who are homeless; 10. Ensure that all homeless children and youth receive placement in appropriate programs, such as Special Education, gifted and talented, or English as a Second Language programs; 11. Ensure that all data requests from the Georgia Department of Education and any entity acting on the behalf of the Georgia Department of Education are accurately and promptly reported; 12. Ensure that identified and enrolled homeless children and youth are reported as required in the Georgia Department of Education Student Record; 13. Ensure that services provided by funds from this grant will not replace the regular academic program and will be designed to expand upon or improve services provided as part of the school's regular academic program; and 14. Ensure that an annual performance and fiscal report will be submitted for each year grant funds are received.
<p>School Improvement Grant 1003a</p>	<p>The Superintendent certifies that each of the statements below concerning the use of funds allocated through the Title I, Part A, 1003(a) School Improvement Grants for FY21 are true and correct. Title I, Part A, 1003(a) School Improvement Grant funds will be used to support the following:</p> <ol style="list-style-type: none"> 1. Improved student achievement in the target areas and subgroups to be addressed regarding status as a Priority or Focus school; 2. Costs directly associated with schools developing required school improvement plans; the school is awarded the funds and the principal with the leadership team will create the budget and justification of expenses with the support of a school effectiveness specialist; 3. Specific content areas and/or subgroups to be addressed regarding status as a Priority or Focus school and the degree that a direct connection between the budget and the areas of need must be evident;

	<ol style="list-style-type: none"> 4. For instruction or to support instruction; and 5. For personnel services and benefits that are non-recurring, since the funds are for a fifteenth month period (July 1, 2020 through September 30, 2021). <p>RCPS will provide technical assistance and support to Priority and Focus schools in the following areas:</p> <ol style="list-style-type: none"> 1. Needs assessment and root cause analysis in support of School Improvement Planning; 2. Allowable expenses related to Title I, Part A, 1003(a) School Improvement Grant funds; and 3. Appropriate reporting of improvement activities by schools and engagement in provided professional learning trainings for LEA and school leadership.
<p>School Improvement Grant 1003g</p>	<ol style="list-style-type: none"> 1. All funds will be used in accordance with the guidance requirements of the School Improvement Grant (SIG) 1003(g). 2. SIG schools will be served as school-wide and not targeted assistance schools. 3. All teachers in SIG schools will be highly qualified.* 4. There will be no reduction to state funding in SIG schools. 5. RCPS will implement the TKES/LKES evaluation systems in the SIG schools. 6. Incentives may be provided to secure highly effective teachers and high-performing turnaround principals within the SIG schools. 7. Incentives and rewards will be provided to retain highly effective teachers and high-performing turnaround principals within the SIG schools. 8. A process will be developed for removing teachers from SIG schools, who after ample opportunity have not improved. Further, ineffective teachers will not be transferred to SIG schools. 9. The LEA will maintain a high-performing turnaround principal in SIG schools. 10. The LEA must ensure that principal selection for SIG schools is approved by GaDOE. 11. The SIG schools will implement the Georgia Standards of Excellence (GSE) and use Georgia’s Frameworks in core academic subjects. 12. The SIG schools will administer benchmark framework assessments and analyze results to guide instruction. 13. The SIG schools will implement short-term action plans and report the plans via Indistar©. 14. The SIG schools will address targeted areas from the GSAPS through short-term action plans. 15. The SIG schools will analyze teacher attendance and develop action plans if needed. 16. The SIG schools will analyze student attendance and develop action plans if needed. 17. The SIG schools will analyze discipline records and develop action plans if needed. 18. The SIG schools will participate in the mandated GaDOE professional learning for School Improvement Grant schools.

	<ol style="list-style-type: none"> 19. The SIG schools will provide increased learning time as defined by the SIG guidance. The increased learning time will include a minimum of 60 additional hours added to the school year for all students. 20. The SIG schools will provide mechanisms for family and community engagement. 21. Relevant, ongoing, high-quality, job-embedded professional development for all staff, which may include common, collaborative, vertical planning time, will be provided in SIG schools. 22. The LEA will modify practices and policies that interfere with the implementation of the School Improvement Grant as directed by the SIG guidance. 23. The LEA will provide the principal operational flexibility in the areas of staffing, scheduling, and budget. 24. The LEA will monitor and evaluate SIG funded external providers/vendors to ensure quality performance. 25. The LEA will monitor the SIG school to determine whether the school is implementing the intervention model with fidelity, making progress on the leading indicators described in the SIG Final Requirements, and meeting annual goals established by the LEA for student achievement. The LEA will submit the required monitoring reports via Indistar®. 26. The Georgia Department of Education will assign a SIG 1003(g) School Effectiveness Specialist to provide technical assistance to the SIG school. The GaDOE SIG 1003(g) Program Manager will provide technical assistance to the LEA SIG Coordinator. 27. The LEA will collaborate with the GaDOE SIG 1003(g) Program Manager to support the reform efforts in the SIG school(s). 28. The LEA will monitor and evaluate the actions schools have taken, as outlined in the approved SIG application, to sustain the reforms after the funding period ends and that it will provide technical assistance to schools on how they can sustain progress in the absence of SIG funding. <p><i>*Optional for SIG schools implementing the Restart model of reform</i></p>
<p>Title III, Part A – Language Instruction for English Learners and Immigrant Students</p>	<ol style="list-style-type: none"> 1. RCPS assures compliance with the standardized, statewide English learner (EL) entrance and exit procedures and identifies students for EL status within 30 days of enrollment in a school in Georgia [Sections 3113(b)(2) and 1112(e)(3)]. 2. RCPS assures compliance with Sec. 1112(e) Parents Right-to-Know, prior to, and throughout, each school year as of the date of application [Sec. 3116(b)(4)(A)]. 3. RCPS assures that it is not in violation of any State Law, including constitutional law, regarding the education of English learners, consistent with Sections 3125 and 3126 [Sec. 3116(b)(4)(B)]. 4. RCPS assures that each school with English learner students receives funds from non-Federal sources to fulfill the LEA’s obligations under Title VI of the Civil Rights Act of 1964 and the Equal Educational Opportunities Act (EEOA), before using Title III, Part A funds for languages services to EL students [Sec. 3115(g)]. 5. RCPS assures that it complies with the requirement in section 1111(b)(2)(B)(ix) regarding assessment of English learners in English [Sec. 3113(b)(3)(A)].

	<ol style="list-style-type: none"> 6. RCPS assures that it annually assesses the English proficiency of all English learners participating in a program funded under this subpart, consistent with section 1111(b)(2)(G). 7. RCPS assures that consultation took place with teachers, researchers, school administrators, and parents and family members, community members, public or private entities, and institutions of higher education, in developing and implementing its educational plan for English learners [Sec. 3116(b)(4)(C)]. 8. RCPS assures that it has selected one or more methods or forms of effective instruction to be used in Title III-funded programs and activities to assist EL students attain English proficiency and meet challenging state academic standards [Sec. 3115(f)(1)]. 9. RCPS assures that, if applicable, it will coordinate activities and share relevant data under its plan with local Head Start and Early Head Start agencies, including migrant and seasonal head Start agencies, and other early childhood education providers [Sec. 3116(b)(4)(D)]. 10. RCPS assures that all teachers in any Title III-funded language instruction educational program are fluent in English and any other language used for instruction, including having written and oral communications skills [Sec. 3116(c)]. 11. RCPS consults with officials of private schools in a timely and meaningful manner to make available equitable Title III, Part A services to eligible English learners and immigrant children attending private schools located within the LEA’s geographical boundaries [Sec. 9501].
<p>Title IV, Part A – Student Support and Academic Enrichment</p>	<p>ASSURANCES. Pursuant to ESEA, Sec. 4106 (c), RCPS assures that it —</p> <ol style="list-style-type: none"> 1. shall develop its application through [initial] consultation with parents, teachers, principals, other school leaders, specialized instructional support personnel, students, community-based organizations, local government representatives, charter school teachers, principals, and other school leaders , and others with relevant and demonstrated expertise in programs and activities designed to meet the purpose of the grant; and 2. shall engage in continued consultation with the entities described in paragraph (1) in order to improve the local activities in order to meet the purpose of this grant and to coordinate such implementation with other related strategies, programs, and activities being conducted in the community. <p>Pursuant to ESEA, Sec. 4106 (d), the LEA assures that it will—</p> <ol style="list-style-type: none"> 1. conduct a comprehensive needs assessment [at least every three years dependent upon allocation amount] in order to examine needs for improvement of— <ol style="list-style-type: none"> a. access to, and opportunities for, a well-rounded education for all students; b. school conditions for student learning in order to create a healthy and safe school environment; and c. access to personalized learning experiences supported by technology and professional development for the effective use of data and technology.

	<p>Pursuant to ESEA, Sec. 4106 (e), the LEA assures that it will—</p> <ol style="list-style-type: none"> 1. include in the consolidated improvement plan application a description of the activities and programming <ol style="list-style-type: none"> a. any partnership with an institution of higher education, business, nonprofit organization, community-based organization, or other public or private entity with a demonstrated record of success in implementing activities, if applicable [(f) SPECIAL RULE.—Any local educational agency receiving an allocation under section 4105(a)(1) in an amount less than \$30,000 shall be required to provide only one of the assurances described in subparagraphs (B), (C), and D).] b. describe how funds will be used for activities related to supporting well-rounded education c. describe how funds will be used for activities related to supporting safe and healthy students d. describe how funds will be used for activities related to supporting the effective use of technology <p>Pursuant to ESEA, Sec. 4106 (e)(2), the LEA assures that it will—</p> <ol style="list-style-type: none"> a. prioritize the distribution of funds to schools served by the local educational agency, or consortium of such agencies, that— <ol style="list-style-type: none"> i. are among the schools with the greatest needs, as determined by such local educational agency, or a consortium ii. have the highest percentages or numbers of children counted under Sec. 1124(c) iii. are identified for comprehensive support and improvement under Sec. 1111(c)(4)(D)(i) iv. are implementing targeted support and improvement plans as described in Sec. 1111(d)(2) v. are identified as a persistently dangerous public elementary school or secondary school under Sec. 8532 b. comply with Sec. 8501 (regarding equitable participation by private school children and teachers) c. use not less than 20 percent of funds received under this subpart to support one or more of the activities authorized under Sec. 4107 d. use not less than 20 percent of funds received under this subpart to support one or more activities authorized under Sec. 4108 e. use a portion of funds received under this subpart to support one or more activities authorized under Sec. 4109(a), including an assurance that the local educational agency, or consortium of Local Educational Agencies, will comply with Sec. 4109(b) f. annually report to the State for inclusion in the report described in Sec. 4104(a)(2) how funds are being used under this subpart to meet the requirements of subparagraphs (c) through (e)
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	<p>SPECIAL RULE. — For an LEA receiving an allocation under Sec. 4105(a)(1) in an amount less than \$30,000, these assurances are amended and only require such LEA to provide for one of the assurances described in subparagraphs (c), (d), and (e) of subsection (e)(2) above. In submitting these assurances, it is understood that such LEA is adhering to this special rule.</p> <p>All budget descriptions must provide detail that is clear and specific, so reviewers may verify program activities are properly identified by focus area as per ESEA Sec. 4107, 4108, and 4109, and to ensure items are necessary, reasonable, allocable, and consistent with CLIP, SIP, grant, and 2 CFR requirements.</p>
<p>Title V, Part B – Rural and LowIncome School Program</p>	<p>In General – Each local educational agency receiving Title V, Part B funding shall provide assurances that it will:</p> <ol style="list-style-type: none"> 1. Comply with the eligibility requirements listed in Sec. 5221(b)(1)(A-B). 2. Target funds to schools for activities listed in Sec. 5222(a)(1-7). <ul style="list-style-type: none"> ○ Teacher recruitment and retention. ○ Teacher professional development. ○ Educational technology. ○ Parent involvement activities. ○ Safe and Drug-Free School Program activities. ○ Title I, Part A activities. ○ Title III Activities. 3. Comply with the stricture against supplanting in Sec. 5232. 4. Keep necessary records and provide information to the Georgia Department of Education that are consistent with responsibilities and accountability requirements listed in Sec. 5224(a)(1-3). 5. Administer an assessment that is consistent with Sec. 1111(b)(3). 6. Will ensure that all data requests from the Georgia Department of Education and any entity acting on the behalf of the Georgia Department of Education are accurately and promptly reported.
<p>IDEA – 611 and 619</p>	<p>This grant is specifically subject to the provisions of Individuals with Disabilities Education Improvement Act of 2004 (Act or IDEA). This grant is also subject to the Title I regulations in 34 C.F.R. Part 200 and the Education Department General Administrative Regulations (EDGAR) in 34 C.F.R. Parts 76 (Except for 76.650 – 76.662 (Participation of students enrolled in private schools)), 77, 81, 82, and 85 and the Uniform Administrative Requirements, Costs Principles and Audit Requirements for Federal Awards in 2 C.F.R. Part 200.</p> <ol style="list-style-type: none"> 1. IDEA 611 and 619 Part B approves budgets for up to 15 months between July 1, 2018, and September 30, 2019. Funds may be encumbered for expenditures July 1, 2018, through September 30, 2019, once the budget is approved for the new grant period. 2. Completion reports are due 30 days after the end of the grant period. The grant period ends September 30, 2019. Completion reports are due October 30, 2019. 3. LEAs must establish internal control policies and procedures to procure, record and maintain custody of equipment and real property purchased with IDEA funds. The policies and procedures must include

	<p>how the LEA will account for and maintain control of equipment and real property used at private schools.</p> <ol style="list-style-type: none">4. LEAs must maintain adequate internal controls in the procurement process for goods and services supporting the IDEA program in accordance with Georgia’s Financial Management for Georgia LUAS Manual. A copy of the manual is available on the Georgia Department of Education’s (Department) website at: http://www.gadoe.org/Finance-and-BusinessOperations/Financial-Review/Pages/default.aspx5. LEAs must conduct and reconcile physical inventories of equipment purchased with IDEA funds at the central office, local schools, and private schools once every two years. The LEA must use, manage, and dispose of equipment acquired under IDEA in accordance with federal and state laws and procedures.6. LEAs must ensure that all children with disabilities have available to them a Free Appropriate Public Education as defined by IDEA. https://www.gpo.gov/fdsys/pkg/USCODE-2011-title20/pdf/USCODE-2011-title20-chap33.pdf.7. LEAs must ensure that eligible private and home school children, have equitable participation in IDEA services and must spend the appropriate proportionate share amount which is calculated in the Consolidated Application.8. LEAs must ensure that all teachers and paraprofessionals hired meet Professional Qualifications standards.9. LEAs may not use IDEA funds to supplant or replace local or state funds. The LEA must use IDEA funds to supplement funds that would be made available from non-federal sources for the education of IDEA students.10. IDEA permits, and in some instances, requires school districts to use a portion of funds provided under Part B of the IDEA for the purpose of CEIS. Federal regulations specify (1) how and on whom CEIS funds may be spent; (2) the reporting requirements for school districts providing CEIS; (3) the requirement for using CEIS funds by a district that is identified as having significant disproportionality; and (4) the relationship of CEIS to maintenance of effort requirements. Any district may opt to use up to, but not exceeding, 15 percent of the total amount of its 611 and 619 Part B IDEA funds for CEIS. However, whenever a district is determined by the State, based on the district’s numerical data, to have significant disproportionality in the identification, placement and/or discipline of children with disabilities, the district must use the maximum amount of 15 percent for CEIS to help address issues of disproportionality. CEIS must be provided to students particularly, but not exclusively, in those race/ethnic groups that were significantly impacted.11. LEAs must ensure that appropriate documentation is maintained for auditing and monitoring purposes.12. LEAs receiving funds under IDEA must agree to participate in evaluation studies conducted by the US ED, the Department, or entities acting on behalf of either agency for data reporting in accordance with the ESEA. In addition, it is the responsibility of the LEA to ensure the accuracy and timeliness of any data submitted from the LEA. The LEA should have policies and procedures on data
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	<p>collection, verification, reporting and publishing to ensure adequate controls are in place.</p> <p>13. LEAs have the responsibility of implementing IDEA in accordance with the LEA's approved consolidated application and applicable federal and state regulations. In addition, the program guidance (non-regulatory Draft Guidance), fiduciary guidance (2 C.F.R. Part 200), Education Department General Administrative Regulations (EDGAR), and General Education Provision Act (GEPA) are available on the US ED Web site at www.ed.gov.</p> <p>14. LEAs must permit the Georgia Department of Education (Department) and auditors to have access to the LEA's records and financial statements as necessary for the Department to meet the requirements of 2 C.F.R. Part 200.332</p> <p>15. As part of the IDEA, Part B application approval process, applicants must comply with 34 CFR 300.203, Maintenance of Effort. The U.S. Department of Education determines compliance with this requirement by comparing actual state and local special education expenditures for the most recent fiscal year to actual expenditures made in the year effort was last met.</p> <p>16. In accordance with 2 C.F.R. Part 200.415(a), LEAs are required to assure that expenditures are proper and in accordance with the terms and conditions of the federal award and approved project budgets, the annual and final fiscal reports or vouchers requesting payment under the agreements must include a certification, signed by an official who is authorized to legally bind the non-federal entity, which reads as follows: knowledge and belief that the report is true, complete, and accurate, and the expenditures, disbursements and cash receipts are for the purposes and objectives set forth in the terms and conditions of the federal award.</p> <p>17. In accordance with 34 C.F.R. Part 300.202(a)(2), amounts provided to the LEA under IDEA Part B must be used only to pay the excess costs of providing special education and related services to children with disabilities. Excess costs are those that are in excess of the average annual per-student expenditure in an LEA during the preceding school year for an elementary school or secondary school student, as may be appropriate. LEAs are required to submit expenditures for Excess Cost Calculation annually to demonstrate compliance with this Federal regulation.</p>
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GEPA Assurance

The purpose of this assurance is to comply with the requirements of the General Education Provisions Act (GEPA), Section 427, enacted as part of the Improving America's Schools Act of 1994 (Public Law (P.L.) 103-382).

Requirement

Section 427 of the United States Department of Education's General Education Provisions Act (GEPA) requires each applicant for funds (other than an individual person) to include in its application a description of the steps the applicant proposes to take in order to ensure equitable access to, and participation in, its federally-assisted programs for students, teachers, and other program beneficiaries with special needs.

Local education agencies (LEAs) or other eligible applicants that apply for federal funding through the Consolidated LEA Improvement Plan (CLIP) application must provide this description in their

application. The Georgia Department of Education (GaDOE) is responsible for ensuring that the LEA or other local entity has submitted a sufficient section 427 statement.

Developing a Response

GEPA allows applicants discretion in developing and describing the activities that are occurring to meet this requirement. The statute highlights six types of barriers that may impede equitable access or participation: gender, race, national origin, color, disability, or age. Based on local circumstances, LEAs should determine whether these or other barriers may prevent your students, teachers, etc. from such access or participation in the federally-funded project or activity.

Format

The description(s) provided in the CLIP application need not be lengthy. Applicants may provide a clear and succinct description of how the LEA will address the barriers, as applicable to the LEA's local context, which may impede equitable access or participation in the LEA's Federal Programs.

The LEA may use information it has obtained through its comprehensive needs assessment process or its District Improvement Plan (DIP) to develop its statement in response to the GEPA requirement. The root causes identified in the DIP combined with the associated use of federal funds may be appropriate, based on the LEA's local context, to satisfy the GEPA requirement. Examples of this approach are illustrated below.

- The LEA or school may have identified a lack of cultural competency in instruction, specifically in regard to the social, emotional, and academic success of its English learners, as a root cause of low student achievement. If the LEA then utilizes its federal funds to provide professional development opportunities for teachers by addressing culturally responsive instructional practices, a description of how this activity will be implemented would address a barrier to equitable participation based on national origin, thereby satisfying the GEPA requirement.
- The LEA or school may identify the disproportionate use of exclusionary discipline practices (removing or excluding students from the classroom), specifically in regard to black, Hispanic, or Native American students, as a root cause of low student achievement. If the LEA then utilizes its federal funds to reduce the use of discipline practices that remove students from the classroom, a description of how this activity will be implemented would address a barrier to equitable participation for students of color, thereby satisfying the GEPA requirement.
- The LEA or school may identify a lack of student participation in advanced placement STEM courses, specifically in regard to female students, as a root cause of low student achievement. If the LEA is then utilizing its federal funds to increase outreach efforts to female students to encourage enrollment and participation in advanced placement STEM courses, a description of how this activity will be implemented would address a barrier to equitable participation for students based on gender, thereby satisfying the GEPA requirement.

Note: While the LEA's statement of non-discrimination is supportive of the intent of the GEPA statement, it should not be submitted as the LEA's description to satisfy the GEPA requirement.

Submitting GEPA to GaDOE

The GEPA response is submitted to GaDOE on the fiscal year consolidated application. On the GEPA tab, there is a space for the LEA to provide their statement. The Superintendent will submit this to GaDOE by October 1. GaDOE will check to ensure a GEPA statement is provided by the LEA each fiscal year.

Prayer Certification

Sec. 8524 of the Elementary and Secondary Education Act of 1965 (ESEA) as amended by the Every Student Success Act of 2015 (ESSA) requires that, as a condition of receiving ESEA funds, a sub-grantee or sub-recipient must certify in writing to its state educational agency (SEA) that it has no policy that

prevents, or otherwise denies, participation in constitutionally protected prayer in public schools as set forth in the law. Each fiscal year, the Superintendent will review and complete this certification on the My GaDOE Portal (<https://portal.doe.k12.ga.us/login.aspx>) by October 1. An LEA is any district, charter school, agency, or program receiving a federal allocation.

Budgets

Budget by each program: RCPS must submit a program budget for each applicable program in the consolidated application each fiscal year. The budget must be approved by the appropriate program manager or area specialist before funds are available through Georgia's Grants Accounting Online Report System (GAORS). Budgets should be submitted as soon as the LEA CLIP is approved and no later than October 1. This will ensure the LEA implements its supplemental support services for children when the school year begins. Amendments to original budgets are accepted throughout the year. (2 CFR 200.303(a))

Budget summary: RCPS will be able to view a budget report that compiles budgeted items by function and object across all programs. This feature will enable RCPS to view all funds that are budgeted for professional learning, teacher salaries, travel, instructional materials, etc.

Program-Specific Worksheets

Some programs require data unique to their legislation and the Consolidated Application houses these data requirements. For example, Title I, Part A requires rank order of schools based on poverty percentages. This requirement is not required by other programs.

Surveys and Attachments

Some programs require surveys and other data collections unique to their legislation and the Consolidated Application houses these surveys and data collections. For example, Title I, Part A requires documentation of rezoning and opening/closing of schools.

Resolution for Unapproved District CLIP

If corrections and/or adjustments are needed for the CLIP, the Federal Programs Director will contact the appropriate Program Director/Coordinator to make changes immediately. The Superintendent will review for approval and resubmit the CLIP immediately. If additional information is needed to make the correction and/or adjustment, the appropriate district administrator will contact the GaDOE Specialist for direction and guidance. This process is repeated until the CLIP is approved by GaDOE RCPS CLIP Approval Process.

RCPS updates the CLIP annually. The following process is followed:

- The Director of Federal Programs and the Title I Coordinator will participate in the GaDOE CLIP webinar.
- A meeting is held with district Federal Program Directors/Coordinators, Curriculum Director and Coaches, HR leaders, Chief Academic Officer, Professional Learning Director and Coaches, and other pertinent district leaders to discuss required changes to the CLIP and the review process.
- The Federal Programs Director, along with key district personnel, work together to analyze effective measures on the current CLIP, analyze current data and recommend revisions the CLIP.
- The recommended revisions are discussed in meetings and then CLIP revisions are made. The revised CLIP is then shared with other administrators and principals for input and further revisions.
- The draft CLIP is then shared with teachers, parents, students and community members. Multiple meetings are offered to gather input. Parent and community members are sent information inviting them to participate via mail, email, telephone, flyers, website, and/or newsletters. District

programs are shared with attendees. Attendees are asked to provide written input during the process.

- Input received from stakeholders is shared with the district leaders. Final revisions to the plan are completed by the Federal Programs Director and Title I Coordinator.
- The final plan is posted on the district website for final approval.
- The CLIP/SIP is submitted to the superintendent for final approval before submission to the GaDOE.
- Documentation includes sign-in sheets, agendas, meeting minutes, emails and returned feedback.

Rockdale County CLIP Approval Process for Schools

Rockdale County Schools update their CLIP annually. The following process is followed:

The Federal Programs Director and Title I Coordinator will participate in the GaDOE CLIP webinar.

- A meeting will be held with school principals and their respective Title I stakeholders to discuss required changes to the school CLIP/SIP and the review process.
- The Federal Programs Director, Title I Coordinator and Title I P&FE Director will schedule meetings with school Title I teams, upon request, either in person or via TEAMS.
- The school Title I stakeholders will analyze school data and provide input to revise the school CLIP/SIP as scheduled by each principal.
- Revised drafts will be provided to all stakeholders for input. Input will be collected and reviewed by the Title I stakeholders under supervision of the principal. Collective conversation will take place and revisions will be made based on collective decisions.
- After revisions are finalized, the school principal will submit the CLIP/SIP to the district through SLDS.
- The Federal Programs Director will review the school CLIP/SIP and provide feedback either approving the CLIP/SIP, Approving the CLIP/SIP with recommendations, or rejecting the CLIP/SIP requesting revisions.
- The Federal Programs Director will provide feedback to the principal for technical assistance. The Federal Programs Director will also request to meet with the principal to provide additional assistance and answer questions.
- After revisions are made with the input from the school Title I stakeholders, the principal will re-submit the school CLIP/SIP to the district.
- A final review of the school CLIP/SIP along with budget alignment will be completed by the Federal Programs Director who will then approve the CLIP/SIP, approve the CLIP/SIP with recommendations or reject the CLIP/SIP.
- If a second rejection occurs, the Federal Programs Director will contact the principal via TEAMS or face-to-face- to assist with the revision process. The revised CLIP/SIP will then be re-submitted again for approval.

Implications for School CLIPs

During their annual Title I program planning workshops held each summer, school leadership teams identify and record the extent to which the activities, strategies, and/or interventions contained in their school improvement plans meet the various levels of qualifying as being evidence based; strong, moderate, promising, or rationale, if sufficient research can be located to substantiate the use of the program or strategy to impact instruction. If sufficient research cannot be located, a logic model will be developed that includes a rationale for using the program or strategy and what evidence will be collected to determine the impact of the program or strategy. This information will be documented in each school improvement plan.

Resolution for Unapproved School CLIP/SIP

If corrections and/or adjustments are needed for the School Needs Assessments, Parent and Family Engagement Plans, School Improvement Plans, and/or budget alignment to SIPs, the plans are returned to

the school principal with explanations for guidance. The Title I PFE Director, Title I Coordinator, and Federal Programs Director will provide technical assistance to the principals or appropriate staff based on the corrective actions and/or adjustments needed within a two-week period. The principal will re-submit the school plan to the district. The Federal Programs Director will review for final approval of plans and budgets after corrective actions and/or adjustments have been completed and approved.

INDICATOR 3: SERVICES TO ELIGIBLE PRIVATE SCHOOL CHILDREN

The purpose of the Title I, Part A Every Student Succeeds Act is to provide to eligible private school students, their teachers, and their families services that are equitable to the services being provided to similar students, their teachers, and their families attending public schools. Title I services for these students must be developed in a meaningful consultation with private school officials. Services provided to private school students by an LEA must be secular, neutral, and non-ideological.

Eligibility of Private School Students

Eligible private school students are those who:

- Title I, Part A – reside within Title I eligible attendance areas (based on DE1111 address, grade, age).
- Title I, Part C, Title I, Part D, Title II, Part A, Title III, Title IV, Part A, Title X, Part C and IDEA – attend a private school whose physical location is within the RCPS geographic boundaries.
- Title IV, Part B – attend a private school whose physical location is within the geographic boundaries of the targeted attendance area identified in the approved, or amended, grant application (RFP).
- Are identified through consultation with the private school as failing, or most at-risk of failing, to meet high student academic achievement standards.

Timely and Meaningful Consultation

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 students;
- What services the LEA will offer to eligible private school students;
- 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 students, 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 students 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 students 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 students from low-income families residing in participating public school attendance areas, including whether the LEA will extrapolate data, if a survey is used;
- How, if the LEA disagrees with the views of the private school officials on the provisions of services through a contract, it will provide in writing to such private school officials an analysis of the reason why it has chosen not to use a contractor;
- Whether the LEA will provide services directly or through a separate government agency, consortium, entity, or third-party contractor;
- Whether to provide equitable services to eligible private school children—
 - a) by creating a pool or pools of funds with all of the funds allocated under subsection (a)(4)(A) based on all the children from low-income families in a participating school attendance area who attend private schools; or
 - b) in the agency’s participating school attendance area who attend private schools with the proportion of funds allocated under subsection (a)(4)(A) based on the number of children from low-income families who attend private schools;
- Whether to consolidate and use funds provided under subsection (a)(4) in coordination with eligible funds available for services to private school children under applicable programs, as defined in section 8501(b)(1) to provide services to eligible private school children participating in programs.
- Each local educational agency shall maintain in the agency’s records and provide to the State educational agency involved a written affirmation signed by officials of each participating private school that the meaningful consultation required by this section has occurred.
- The equitable services the LEA will provide to teacher and families of participating private school students.

Invitations

All private schools in the RCPS district, as well as private schools outside the district who provide DE1111 forms with participating district students, will receive an invitation to consult in participation of Federal Programs. Invitations for private schools to consult for the following school year funds, are sent in October, via the ES4PS portal, which is managed by the Title I Administrative Assistant. A consultation meeting is held in November to present information about equitable services under ESEA and IDEA for the next school year. All Federal Programs Directors/Coordinators are invited to the meeting, which is documented with an agenda and sign-in sheet or virtual attendance list. Upon receipt of the intent to participate form which is provided to private school officials through ES4PS, a meeting is held to discuss plans and the required components of Title services for private school students. For the private schools receiving Federal funds from RCPS, meetings are scheduled periodically throughout the school year to discuss the progress and process of Title I, II, III, IV or IDEA services. Documentation of meetings is collected and maintained. If a private school does wish to participate, the Rockdale County

Public School System will use the USED guidance, specifically related to the new process outlined by ESSA.

Initial Consultation

The Office of Federal Programs receives a DE1111 form from the private school officials. The DE1111 form lists the enrollment of students who reside in Rockdale County, regardless of where the private school is located. The Federal Programs Administrative Assistant enters the DE1111 data into the GaDOE portal by the required deadline.

In the fall of each school year, the Federal Programs Administrative Assistant initiates sending the **Initial Invitation to Consult** letter through the ES4PS platform to each of the private schools in the platform. This invitation requests private school officials to participate in a consultation meeting that will provide information on federally funded programs and services that may be available to them in the following school year. If schools do not respond via the GaDOE ES4PS platform, a similar letter is sent to those private schools via US Postal Service with a return-receipt requested. Included with the letter is a form for the private schools to complete and return in the provided self-addressed, stamped envelope, to indicate whether the private school will be attended, will not be attended, or cannot attend but would like more information. Efforts are made to follow-up by phone, email, face to face, or a TEAMS meeting with schools that do not return the enclosed form or respond to the ES4PS invite.

The Initial Consultation Meeting is held with attendance from the Federal Programs Director and the administrator or representative for each Federal Program involved. The Initial Consultation Meeting is to provide information on services that may be available to the eligible private schools.

Returned forms to attend meetings, copies of the mailing envelopes, documentation of follow-up efforts to contact the school, and sign-in sheets from the consultation meeting are filed with monitoring documentation and shared with each of the grant administrators.

The official notification documentation is maintained in the Equitable Services for Private Schools (ES4PS) system. In the event there are no participating schools after consultation, Form A is submitted through the ES4PS platform indicating “No Participation” for the following school year. Meeting artifacts (sign-in sheets, agendas, PowerPoint presentations, etc.) are maintained by the Federal Programs Offices and shared with each of the individual grant administrators. In addition, copies of the invite letters and communication logs are maintained.

ES4PS Form A

Once a private school has committed to participate in equitable services in the upcoming year, planning begins. Form A captures enrollment information or “No Participation” and is due prior to June 30. This documentation will be kept and updated in SLDS for participating schools.

Ongoing Consultation (Applicable Program Areas)

Prior to providing services the grant administrator will obtain proof of the private schools’ nonprofit status using the Georgia’s [Secretary of State Corporations Division](#) website. The physical location of the school is then verified by the Federal Programs Office. In the event there is a private school that would like to continue the consultation process, the respective grant administrator will hold meetings with the private school to:

- provide ongoing consultation to develop plans for implementation;
- confirm that plans are being executed as designed and agreed upon; and
- verify that services occurred as planned and were equitable in nature.

Ongoing consultations take place in several ways. Administrators of all Federal Programs provide access to private school officials at any time as needed. Private school officials are encouraged to contact their

respective Federal Programs administrator or the Federal Programs Director at any time for assistance. In addition, Federal Programs administrators contact the private school officials monthly to monitor programs and ensure that the targeted students are showing growth with the current plans in place. During ongoing consultations the grant administrator will have continuous conversations with the private school officials regarding the defined topics that must be covered:

- Identifying Children’s Needs
- Services
- Timing of Services
- Effectiveness
- Size and Scope
- Title I Method for Determining Poverty (if applicable)
- Decision Making
- Disagreement
- Service Provider
- Delivery Model
- Coordination of Funds
- Documentation

Documentation of the ongoing consultation process will be maintained by the appropriate grant administrator. Each September Form B will be completed by the grant administrator(s) for each of the participating private school and sent to the respective private school for them to complete through the ES4PS portal. Form B will be used to confirm that the private school received timely and meaningful consultation and equitable services from the LEA.

Services Provided

Services provided by RCPS for private school participants are designed to meet their educational needs and supplement the educational services provided by the private school. These services may be provided by the LEA, or by a contractor who is independent of the private school or religious organization. Title I services or benefits must be secular, neutral, and non-ideological.

Title II, A

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 950I of the ESEA (Participation by Private School Children and Teachers). The statute requires LEAs to provide private school students, their teachers, and other educational personnel with educational service on an equitable basis and in a timely manner.

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 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 records by LEAs and these private school English Learner counts are included in the annual Title III district allocations. 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 students and educational personnel.

Equitable Services and Consultation under CARES Act

ESSER, the provision of equitable services is a requirement of Section 18005 of the CARES Act. The statute references providing equitable services in the same manner as provided under section 1117 of the Elementary and Secondary Education Act of 1965 (ESEA). ESEA Section 1117, Title I regulations and Title I, Part A non-regulatory guidance have been used to develop CARES Act consultation and the provision of equitable services.

While calculations for earning a proportionate share of CARES Act funds are based on residency and poverty as aligned with ESEA Section 1117, implementation as aligned with CARES Sections 18003 and 18005 appears to benefit all public and private school students and teachers, not only low-achieving students and their teachers as under Title I, Part A.

An LEA must provide services and other benefits for non-public school students and teachers in a timely manner that are equitable in comparison to the services and benefits provided for public school students and teachers. In accordance with statute, regulations and non-regulatory guidance under CARES and Title I, Part A, services should be available to public and private school students at the same time.

LEAs with participating private schools will use the Proportionate Share Allocations worksheet provided by GaDOE on September 28, 2020, to determine the proportionate share available for each participating private school. In addition to the poverty data gathered from private schools, LEAs must use the allocation approved by the State Board of Education May 2020 and must use the LEAs official poverty count from the official November 6, 2018 FRL Data Collection.

Funding

Rockdale County Public Schools has private school participation. Private school students receive their proportionate share of services via per pupil allocations and required service amounts. Eligibility criteria is 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 applied to those ranges. When a private school determines that the school would like to participate in Title I, II, III, IV or IDEA services, the amount will be determined based on the GaDOE provision calculated for private schools. Detailed information is found in the [Equitable Services Handbook](#) on the GaDOE Ombudsman page.

Finance

It is the responsibility of RCPS to process third vendor work as well as services and materials provided directly from the district. No requests for reimbursement will be allowed as all purchases must be approved prior to the purchase. All materials and supplies purchased by RCPS are the property of the district and inventoried as such before the private school receives delivery. An inventory of all items purchased for the private school will be maintained, and RCPS will complete an inventory audit once per year at the private school. If, at any time, the private school no longer participates in equitable services, the property will be returned to RCPS.

Equitable Services for Private Schools

Private school officials work closely consulting with the administrators of the Federal Programs for which they participate. After meaningful consultation with the appropriate private school officials, RCPS plans, designs, and implements Title I equitable services for identified private school students who reside within our district boundaries.

The administrator of the funding federal program must annually evaluate the equitable services that were provided to the private school students to determine the progress being made in meeting participating

students' academic needs. Federal Program administrators will consult with appropriate private school officials to determine:

- How the services will be academically assessed;
- How the results will be used to improve services;
- What modifications are necessary if annual progress is not made; and
- If the services will be continued.

Tutorial services may be considered as sub-recipients of Title funds for private schools.

- Tutors are selected by the private school officials. In some cases, tutors may be private school teachers who are working after contract hours to provide tutorial services to the students.
- Tutors are required to provide a W-9 and complete the Rockdale County Non-Employee Casual Labor Form.
- Payment for private school tutors is the same as RCPS tutors:
 - \$40/hour for certified teachers
 - \$25/hour for certified paraprofessionals working under the direct supervision of a certified teacher.
- Hours worked and duties performed are documented on the Casual Labor Form.
- The tutor must sign and date the form.
- The private school official must sign and date the form to verify correctness.
- The form, with official signatures, is sent to the administrator of the funding federal program.
- After approval, the federal program administrator signs and dates the casual labor form and sends it to business services for processing.
- Monitoring of the tutor is ongoing and discussed during monthly meetings with the private school administrator.
- Termination of the tutor would be based on subpar or inadequate performance.

Complaints

Complaints by the private school officials are filed in compliance with the LEA complaint process:

Any individual, organization, or agency (“complainant”) may file a complaint with the RCPS System if that individual, organization, or agency believes and alleges that RCPS is violating a federal statute or regulation that applies to a Federal Program of the ESEA Act and ESSER Act. The complaint must allege a violation that occurred not more than one (1) year prior to the date the complaint is received, unless a longer period is reasonable because the violation is considered systemic or ongoing.

Indicator 4: Maintenance of Effort (MOE), Comparability, and Assessment Security

Maintenance of Effort (MOE)

Documentation for Maintenance of Effort (MOE) is only required for districts that do not meet the required maintenance of effort. The district’s MOE is completed by the GaDOE. If GaDOE determines that RCPS has met MOE based on aggregate expenditures of state and local funds, no further calculations are required. The Chief Strategy & Support Services Officer will pull the MOE information from the Consolidated Application. In the event the district does not meet the MOE, the RCPS will pull the financial analysis reports for Fund 100 and complete the MOE worksheets for the two applicable fiscal years, using the worksheet provided by the GaDOE. Rockdale County Public Schools will follow the

GaDOE requirements, including exclusionary funds, for calculating MOE. The Financial Analysis reports are verified by the Executive Financial Manager. These reports are also checked for accuracy during the annual finance audit.

Comparability — Sec. 1118(3)(A)

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

As a requirement established by the Georgia Department of Education (GaDOE) for each school district, RCPS must demonstrate comparability on an annual basis, a prerequisite for receiving Title, I Part A funds.

Comparability Timeline

RCPS must be comparable by July 1 of each fiscal year. However, in Georgia districts have until December 31 to make any adjustments to the online comparability application.

January – April

- Meet with Chief Officer of Human Resources and Chief Financial Officer to proactively engage in district level budget (State and local funds) discussions concerning staff assignments, equipment, and material for the purpose of ensuring compliance with Title IA comparability requirements.

May – July

- Work with Chief Officer of Human Resources and Chief Financial Officer to discuss the requirements for the completion of the upcoming Comparability Report.
- Establish participant roles and responsibilities.
- Establish a specific timeline for completion of the Report.

August

- Obtain a copy of preliminary district-wide school staffing report from the HR Data Manager.
- Compare list of Title IA funded staff as reflected on the School Allocation page to the Title IA funded staff as reported by Human Resources.
- Share accurate Title IA funded staff list with district staff responsible for the Certified/Classified Personnel Information (CPI) report to ensure accurate data is entered in the report.

September

- It is a recommendation and best practice to gather the data needed to complete calculations (student and staff assignments data) and run a preliminary report.
- Run comparability using Comparability Worksheets found on the Title IA website, under Other Resources, [Comparability and MOE](#).
- Make comparability corrections immediately for all schools that are shown to be non-comparable.

October

- Collect the necessary data to demonstrate comparability as of the October full-time equivalent (FTE) count day.

December

- Title IA Comparability Report is submitted annually via the online comparability application in the ConApp.
- Districts will be notified by GaDOE when the online comparability portal site is available for submission.
- Do not submit Comparability Report until notification from Title IA Education Program Specialist.

December – January

- If all schools are not comparable as of the October FTE count day, the Federal Programs Director will file a revised comparability report with GADOE demonstrating that, as of a date determined by GaDOE, comparability has been met.

If comparability is not achieved by a date determined by GaDOE, the district is in violation of Title IA comparability requirements and may be subject to withholding or repayment of the funds in the amount or percentage by which the district has failed to comply.

Procedures for Completing the My GaDOE Portal Comparability Report

It is the responsibility of the Federal Programs Director to ensure that comparability is determined and established within the required time frame.

The GaDOE has developed and utilizes a computerized application to calculate comparability for all school districts in the state. This application is designed to run every possible permutation available to demonstrate comparability. The application is housed in the My GaDOE portal and automatically incorporates current FTE, CPI, and poverty data collected by the Department in the fall of each school year. In the My GaDOE Portal, the Federal Programs Director will run the Comparability Report after receipt of notification from the GaDOE.

1. The Federal Programs Director will log in to the My GaDOE Portal and go to the Title I Comparability Application > Comparability Reporting.
2. The Federal Programs Director will complete the contact information on the Contact Info tab.
3. On the Comparability Reporting Tab, the Federal Programs Director will click on the “Run Comparability” button.
4. The program will go through a process and a chart will populate that will indicate if each school is comparable.
5. If all schools are comparable, the Federal Programs Director and Superintendent will submit the Title I Comparability Application to the GaDOE.
6. If the district is not found to be comparable, the Federal Programs Director will work with the GaDOE Title I Area Specialist for next steps.
7. Next Steps: The Federal Programs Director will work with the district HR Data Manager and the Chief Financial Officer to verify school staff and match CPI report with actual school staff. Follow “Procedures for Meeting Comparability with Self-reported Data” instructions below.

8. The necessary documentation required to rectify the comparability issue are to be provided to the Title I Area Specialist, who is able to adjust the data entries in the “self-reported” section of the application and re-run the comparability calculations. This process is repeated until comparability is met.
9. If, after all options are exhausted, comparability is still not met, RCPS will utilize the Resource Allocation Methodology/Plan (RAM-P) to demonstrate that all schools were equitably funded with state and local funding in order to demonstrate comparability.

Procedures for Meeting Comparability with Self-Reported Data

RCPS adheres to the following procedures for determining comparability in the event the Comparability Application yields that the district is not comparable:

- Meet with district Chief Financial Officer and Chief Officer of Human Resources to discuss needs for meeting comparability with self-reported data.
- Request CPI Report (certified staff and non-certified staff) from the HR Data Manager after the report has been submitted to GaDOE (usually in October). This is the source documentation and must be used for this report.
- Request the October FTE report from the Director of Food and Nutrition. Pre-K will not be counted in the report.
- On the CPI Report, strike through all staff that should not be counted in the comparability report. See table below for who to count and who not to count:

Who to Include	Who NOT to Include
Instructional Staff <ul style="list-style-type: none"> • Core subject teachers • Art teachers • Music teachers • Physical Education teachers • Instructional paraprofessionals • Guidance counselors • Speech Therapists • Media specialists Services Provided by Staff that Support Instruction <ul style="list-style-type: none"> • School social workers • Psychologists 	<ul style="list-style-type: none"> • Federally paid staff • Pre-K staff (teachers and paras) • Privately paid staff • Cafeteria staff • Custodial staff • Nurses • Secretary Staff • Bookkeepers • Bus Drivers • Security Staff/Officers • Clerical staff • Principals • Assistant Principals • Non-instructional paraprofessionals

- Make sure only to count portions of the staff that are split-funded or part-time.
- Sum the staff numbers.
- Pull the latest Comparability Worksheet from the GaDOE website for comparing Title I and Non-Title I Schools or Higher Poverty and Lower Poverty Schools.
- Enter the data into the Comparability Worksheet.
- Submit for superintendent’s signature.
- Submit to GaDOE area specialist electronically and put hard copy in mail to GaDOE as well.
- In the event that the district is not found to be comparable, the Director of Federal Programs will work with the GaDOE Area Specialist to review district source data to rectify.

Procedures for Meeting Comparability through the Resource Allocation Methodology/Plan (RAM/P)

If the district is unable to meet comparability through the previous methods, then the district may use the Resource Allocation Methodology/Plan (RAM/P) to meet the comparability requirement. The RAM/P is a districtwide methodology used to demonstrate the equitable distribution of state and local funds to all schools in the district regardless of Title I status. Additional factors that can be included in a District's RAM/P could be based on student characteristics such as poverty, limited English proficiency, or disability, etc. as is allowed through the section 1120A(c) of the Elementary and Secondary Education Act of 1965 (ESEA) which provides that an LEA may receive Title I, Part A funds only if it uses state and local funds to provide services in Title I schools that, taken as a whole, are at least comparable to the services provided in schools that are not receiving Title I funds. The RAM/P will demonstrate that the district uses state and local funds to provide comparable services to all schools (allocation of state and local funds on an equitable basis).

The completed RAM/P is loaded to the My GaDOE Portal in the General Attachment Tab where it is officially approved by the GaDOE Title I, Part A Program Division.

The Director of Federal Programs, Director of Human Resources, and the Chief Financial Officer maintain documentation demonstrating that the district has fully and correctly implemented the approved RAM/P in order to establish comparability. Source documentation will include items such as, allotment reports, payroll records, and dates of hire or staff reassignment.

Assessment Security, Reporting of Accountability

In compliance with the Elementary and Secondary Act (ESEA) and Georgia law relative to student assessment and data reporting, RCPS conducts the assessment program as required by federal and state law. RCPS takes very seriously the ethical responsibility to provide secure and appropriate testing environments for all students. The district interacts with state and federal agencies relative to the assessment program and accountability mandates. The RCPS Director of Assessments handles assessment documents, secures test materials, complies with confidentiality regarding individual student score reports, and secures school/district data reports in both paper and electronic formats. The RCPS Director of Assessments delivers training and guidance related to the assessment program, assessment data, and accountability mandates to School Test Coordinators.

After district test training, and before the administration of every test, School Test Coordinators deliver training and guidance related to the assessment program, assessment data, and accountability mandates to all teachers and staff who are involved in administering high-stakes assessments. In addition, the district Director of Assessments is responsible for revising/writing, reviewing, sharing, and insuring the implementation of the district testing plan. Each school Test Coordinator is responsible for revising/writing, reviewing, sharing and insuring the implementation of their school testing plan. School test plans are provided to the RCPS Director of Assessments who reviews and approves the plans and keeps them on file at the district office.

For every administration of a high-stakes assessment, the following guidelines are followed:

- The district Assessment Director and Coordinators will stay current on appropriate testing rules and practices by viewing required GaDOE webinars and reading all manuals and memorandums associated with each assessment.
- All School Test Coordinators will be appropriately trained by the district Assessment Director and Coordinators within (at least) a two-week period prior to the opening of the assessment window.
- School Test Coordinators will, in turn, provide mirrored training to all test examiners, proctors, technology specialists, and all school personnel who will assist in any manner with the assessment process.

- Records of participation and sign-in sheets of each of these meetings will be maintained in a centralized location for a minimum of five (5) years.
- Trainings at every level will include a segment covering PSC testing ethics and ethical behavior in testing environments.
- Test materials, when on site, will be continuously maintained in a secured and locked room with access limited to only those who are functioning as the School’s Test Coordinator and the principal.
- School campuses will be quiet and organized on the day(s) of testing.
- Any irregularity or anomalous event taking place in a school during testing will be promptly and fully reported to the district Assessment Director or Coordinator.
- Irregularities involving possible illegal or unethical actions on the part of an employee will be reported to the Georgia Professional Standards Commission.
- If the anomaly rises to the level of an irregularity, it will be promptly reported through the GaDOE portal.
- When test results are returned, they will be disseminated to students and parents in a reasonable time frame.
- Assessment results will be communicated to the public via press releases, sections of the website, and other means as necessary.
- Assessment practices and security measures will be communicated to the public via school newsletters in the month prior to the testing window.

The District/School State Report Card is provided to the public on the RCPS District website, and on each individual school website. At the beginning of each year, the Title I Coordinator is responsible for ensuring that the updated link is provided and posted.

Testing Accommodations

The RCPS Assessment Director trains all School Test Coordinators to ensure an understanding regarding the guidelines for accommodations. This training takes place with the assistance of the appropriate leaders in the Special Education department and the ESOL Coordinator. The Special Education Director assists with the GAA training and the ESOL Coordinator assists with Access training. Training occurs after the GaDOE assessment training and at least two weeks prior to test administration. School examiners are trained by the School Test Coordinators prior to test administration. Proctors and monitors are trained at the same time as examiners, prior to test administration, receiving the same training as the examiners.

School Test Coordinators are required to hold a separate training to ensure accommodations are provided according to IEPs, TCPs, 504 plans, and GaDOE and RCPS guidelines. This training reviews the array of accommodations utilized for testing. One of the major goals stressed during training is to follow procedures. Past irregularities and the number of irregularities that occur each year are analyzed and discussed in an effort to avoid similar irregularities in future testing. During the system training the importance of assuring that students receive their appropriate accommodations is reviewed. School Test Coordinators are encouraged to check the Student Information System (Infinite Campus) as well as check with caseload teachers, ESOL teachers, and 504 Coordinators at the school level regarding student testing accommodations.

Testing Irregularities

In the event of a testing irregularity, examiners or proctors report any possible irregularities to the School Test Coordinator who investigates, informs the principal and then notifies the RCPS Assessment Director.

Testing Confidentiality

The RCPS Director of Assessments visits schools during testing windows before, during, and after testing takes place. School Testing Coordinators sign the “Test Security Information for School Test

Coordinators/Teachers/ and Examiners” during August training and are required to have all certified staff sign at the school level.

Assessment Training Plan

I. Materials:

- a. All School Testing Coordinators must have a sign-in sheet for documentation of teacher and proctor participation.
- b. Department updates provided on each test being administered will be provided as a reference/resource for School Testing Coordinators.
- c. A District Meeting held with School Testing Coordinators to indicate any special requirements from the district.
- d. School Coordinator’s Manuals and Examiner’s Manuals are usually available on the Department’s website. Please use these manuals to assist in training. All manuals must be kept secure and accounted for after each use.
- e. School Coordinators should refer to the Roles/Responsibilities for all individuals being trained from the Department Student Assessment Handbook including, but not limited to, coordinator, principals, examiners, and proctors. Training covers each group’s roles/responsibilities as documented on the sign-in sheets.
- f. Examiners and Proctors sign acknowledging responsibilities for testing

II. Topics:

- a. Arrangement of delivery of materials by the Director of Assessment to the School Coordinator.
- b. The Director of Assessment and School Test Coordinator check the shipment for accuracy of the delivery. Make checks of confirmations and notations of inaccuracies. The materials list is initialed and dated with both parties retaining a copy.
- c. In order to maintain the integrity of the assessment program and its results, security must be established and maintained. The responsibility of the assessment program at the school level rests with the principal and their designated School Test Coordinators.
- d. School Coordinators use the Student Assessment in Georgia Schools (PSC document) to discuss the testing ethics and consequences of violations. Examiner’s sign and date a copy of these guidelines.
- e. School Coordinators use the Examiner “Must Do” page from the Department Student Assessment Handbook as a part of the training at the school level.
- f. School Coordinators are trained in using the forms required from the Department Student Assessment Handbook.
- g. School Coordinators are responsible for ensuring proper coding of test documents.
- h. School Coordinators are responsible for checking the accuracy of student information.
- i. School Coordinators are required to have test examiner’s sign materials in and out each day during test administration.
- j. Proctors are used when required. All test proctors are trained on their roles/responsibilities.
- k. Testing Procedures are clearly articulated to ensure a smooth and problem-free test administration.
- l. Schedules, groups and location assignments, and special directions are distributed and explained before testing administration by the School Test Coordinator.
- m. Accommodations are well documented by the Special Education Department. School Coordinators carefully check to ensure students are provided the appropriate and accurate accommodations for each individual test.

Collection of Materials:

- a. Sign-in and Sign-out sheets are used to document who is responsible for each individual test booklet, the date, and number of test booklets received.

- b. Before testing documents are returned to the Director of Assessment, the School Coordinator carefully accounts for all materials.
- c. During the document count, the School Coordinator checks for complete information (Form Numbers, Labels, Names...) on each answer document.
- d. Once the materials are re-counted by the Director of Assessment and the School Testing Coordinator, the materials are packaged for delivery.

Principal Certification Forms are required for all standardized tests. This document is the principal's verification of adherence to prescribed test administration procedures. The form must be returned at the time of delivery of the testing materials.

Superintendent Test Certification Forms are required twice a school year through the GaDOE Portal. This document is the Superintendent's verification of adherence to prescribed test administration procedures for the district. The form must be completed in January and in July.

Code of Ethics Guidelines for Student Assessment (GaPSC)

RCPS will provide the information to all staff as part of the annual test training prior to state-mandated assessments being administered.

Consequences for Violations Related to Assessment Security

Any employee who suspects a breach in assessment security must immediately report the breach to their immediate supervisor. Failure to report suspected breaches in assessment security can have negative implications upon an employee. In addition, any investigation that results in a determination of guilt related to violations of assessment security can result in loss of employment and a report filed with the Georgia Professional Standards Commission, which may result in loss of a teacher's certification.

District Report Card

In accordance with the reporting of accountability evidence, the Rockdale County Public School System provides public access, on the district and school level websites, to the Governor's Office of Student Achievement (GOSA) district/school report card data.

Under the Every Student Succeeds Act, accountability data must be accessible to the public. The placement of the report card must be in an accessible location for parents and stakeholders.

The Chief Officer of Public Relations includes access to the GOSA link on the district's website. Each principal is responsible for posting the school report card on their respective school's website.

Posting of the GOAS link is monitored by the Title I Coordinator. Screenshots are taken of each school's website in the fall of the year. A copy of the screenshot is kept on file in the Office of Federal Programs for documentation.

English Learner (EL) ACCESS Participation Rate

The Director of Assessments and ESOL Coordinator work collaboratively to monitor the EL ACCESS Participation Rate through the assessment progress feature in the DRC testing platform. During the testing window, Infinite Campus is also monitored for any newly enrolled students in need of completing the assessment. In the event the participation rate falls below 95%, the Director of Assessments is responsible for collecting the participation rate documentation and collecting the justification of reasons for non-participation.

Indicator 5: Internal Controls, Expenditures, Inventory, Drawdowns, Cost Principals – All Programs

Allowability Procedures- 2 CFR § 200.302(b)(7); 2CFR § 200.403

Grant administrators have responsibility for their respective grant budgets to ensure the efficient and effective administration of the Federal award through the application of sound management practices. Allowability is determined prior to the authorization of charges to each grant. District and school needs and action steps are identified during the development of the Comprehensive LEA Improvement Plan (CLIP), School Comprehensive Needs Assessment (CNA), and School Improvement Plan (SIP). Grant administrators develop the district grant initiatives (action steps) based on the identified needs. Schools (Title I funded) develop grant initiatives (action steps) based on their individual school-identified needs. Expenditures are allowable if they align with the program purposes and the prioritized needs identified in the CLIP and addressed in the plan. If not aligned to the CLIP/SIP, they are not allowable.

Grant administrators also determine allowability in accordance with Subpart E – Cost principles and the terms and conditions of the Federal award.

Budget Development

In coordination with the development of the action steps, the district and schools assign the needed resources to support the supplemental action steps based on program allowability. Funds are coordinated to meet the goals and needs of the LEA identified through the CLIP and SIP development process. Grant administrators ensure adherence to all regulations and guidance.

The grant administrator reviews the district/school budgets to ensure that the budgeted line items are allowable, reasonable, and allocable. Additionally, the grant administrator checks the budgets for alignment with the SIP.

During the budget development process, grant administrators also complete supporting program documentation as well as account for the expense of all funds during the year in which the funds are allocated.

When creating the budget, each grant administrator follows the Georgia Local Units of Administration (LUA) chart of accounts. Function and object code combinations are determined by the objectives and allowable activities of the program.

Each grant administrator is responsible for submitting their budget to the GaDOE by the established deadline.

Grant administrators review all expenditures for pre-approval to ensure allowability.

Budget Upload into the System

Federal program budgets are compiled by the appropriate Federal Programs grant administrator. The budget is entered into the Georgia Department of Education (GaDOE) Consolidated Application (Con App) and approved by the district's GaDOE Area Specialist. After approval by the GaDOE Area Specialist, it is then sent to the district's Superintendent for approval. After approval by the district's Superintending, the budget is sent to the GaDOE for approval program manager. Once the budget is approved at the state level, an email is received notifying the Director of Federal Programs, Finance Director, and the Chief Financial Officer that the budget has been approved. The administrator of each Federal Program provides the approved budget to the district's Grants Manager. The approved budget is entered into Munis, the RCPS financial system, to the appropriate fund, function, object, cost center, and program by the Grants Manager.

Process for Comparing Budgets to Expenditures

During the first week of each new month, an expenditure report is provided by the Grants Manager to the administrator of their respective federal program. This report includes the budget amount, actual expenditure amount, encumbrance amount, and the remaining balance. Federal program administrators compare the expenditures to ensure appropriateness within the guidelines of their federal program and timely expenditures of funds. Federal program administrators provide reports to each school principal and their respective Area Superintendent that includes budget amount, actual expenditure amount, encumbrance amount, remaining balance and percent expended year to date. Federal program administrators meet with principals and their respective Assistant Superintendent as requested or if concerns exist.

Process and Authorizations for Budget Revisions

The Rockdale County Board of Education conducts a budget review in the fall of each year (October). Any requested budget amendments are presented to the Superintendent for approval. After approval, the budget amendments are entered into Munis. Program expenditures are compared to the budget by the administrator of their respective federal program before approving requisitions. The Rockdale County Board of Education follows the Georgia Department of Education policies and procedures as it relates to budget revisions for State and Federal Programs.

Period of Performance and When Obligations are Made

The grant period runs from July 1 of the current fiscal year through September 30 of the next fiscal year. Funds must be used during the budget period for which the funds were approved (the fiscal year of the budget). To ensure that all obligations are completed during the proper grant period, the cut-off date for purchase orders is usually around the month of April. Claiming Process Funds are made available for federal grants on a reimbursement basis. Claims for funds are processed by the Purchasing Department after approval by the grant administrator.

Review of Expenditures to Determine Allowability

- **Aligns with Program Purpose** - Grant administrators review all expenditures for pre-approval to ensure allowability (alignment with approved CLIP/SIP and meeting expectations of grant). Bookkeepers create requisitions in Munis. Principals sign off and the requisition is automatically forwarded to the grant administrator. The grant administrator determines allowability and then either rejects or approves the requisition. If rejected, the grant administrator provides technical assistance as to why. If approved, the requisition moves on to the Purchasing Director for approval and to be converted into a Purchase Order.
- **Approval of Fund Requests Based on Identified Needs** - Grant administrators review fund requests to ensure that the program objectives/purpose and terms and conditions of the federal award are met. Each grant administrator ensures that the request reflects an identified need in the Comprehensive LEA Improvement Plan (CLIP) and/or School Improvement Plan (SIP). Allowable activities are approved by the grant administrator. Activities that are not listed in the CLIP or SIP are not allowable and are therefore, rejected.
- **Supplement, not Supplant** - The Every Student Succeed Act (ESSA) has indicated changes to the supplement, not supplant requirements for Title I, Part A. Supplement in a schoolwide program is no longer determined at the expenditure level. It is determined at the LEA level and looks to ensure non-federal funds are distributed to all schools across the LEA in equitable ways. Thus, the LEA's allocations as a whole are examined to ensure Title I, Part A funds supplement, and do not supplant, State and local funds. District Federal Programs expenditures are supplemental to those provided to schools from state and local funds. 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 the Federal Programs. The grant administrators ensure that supplemental services are provided by reviewing all expenditures for pre-approval.

****The ESSER grant does not follow the supplement not supplant provision.**

Supplement, not supplant for Title I, Part A ensures that the LEA will use federal funds received under Title I, Part A to supplement the funds that would, in the absence of such federal funds, be made available from State and local sources for the education of students participating in programs assisted under Title I, and not to supplant such funds. RCPS demonstrates supplement not supplant through the development and implementation of the Resource Allocation Methodology/Plan (RAM/P), which is submitted to GaDOE yearly.

RCPS may exclude from supplanting determinations supplemental non-Federal funds expended in any school for programs that meet the intent and purposes of Title I, Part A. A program meets the intent and purposes of Title I, Part A if it either:

- Is implemented in a school with at least 40 percent poverty;
 - Is designed to promote schoolwide reform and upgrade the entire educational operation of the school;
 - Is designed to meet the educational needs of all students in the school, particularly those who are not meeting state standards; and/or
 - Serves only students who are failing, or most at risk of failing, to meet state standards;
 - Provides supplementary services to participating students designed to improve their achievement.
- **Aligns to Cost Principle Allowability** - Each grant administrator will review all fund requests for pre-approval. The grant administrator will also maintain documentation to support the costs charged to each federal award. The grant administrator will ensure the following:
 - That fund requests are **necessary and reasonable** for the performance of the federal award.
 - The cost will be considered reasonable if it
 - Does not exceed an amount that a prudent person under the circumstances would incur at the same time.
 - Is considered ordinary and necessary for the operation and effectiveness of the federal award.
 - Is comparable to market prices for the geographic area.
 - Follows sound business practices.
 - Is between two parties that are independent
 - That the funds conform to any limitations of exclusions set forth in the 2 CFR Sec. 200.420 as to types or amounts of costs.
 - That the funds are consistent with policies and procedures.
 - That the funds are in accordance with generally accepted accounting procedures.
 - That the funds are allocable to the federal program (law and non-regulatory guidance).
 - The cost will be considered allocable if
 - Goods or services involved are chargeable to the federal award.
 - It is necessary for the overall operation of the federal award.
 - The grant administrator will charge proportional costs to the appropriate grant award if applicable.

- **Allocable** - A cost is allocable to a particular federal award if the goods or services involved are chargeable or assignable to that federal award in accordance with relative benefits received. This standard is met if the cost:
 - Is incurred specifically for the federal award.
 - Benefits both the federal award and other work of non-federal entity and can be distributed in proportions that may be approximated using reasonable methods.
 - Is necessary to the overall operation of the nonfederal entity and is assignable in part to the federal award in accordance with the principles in this subpart.

Any purchases made with grant funds must follow the guidelines for allowable costs.

- **Necessary and Reasonable** - Verify that proposed activities are reasonable and necessary considering the amount of money being spent and the needs of the program. (2 CFR 200.403(a))
 - Reasonable: consistent with prudent business practice and comparable current market value.
 - Necessary: required to carry out the intent and purpose of the Title I, Part A program.
- **Adhere to the period of performance (27 months).**
 - Each grant administrator will ensure that new obligations incurred to carry out the work authorized by the federal grant are during the approved budget period the time frame which the grant may incur new charges.
 - The period of performance will be July – June (12 months) with an interim time frame of July – September (additional 3 months).
 - The federal funds carryover period of performance will be for the full 27-month period of availability.
- **Avoid conflict of interest** (See Conflict of Interest Policy).
 - The funds are adequately documented through the collection of artifacts (agendas, sign-in sheets, handouts, forms).
 - The funds are subject to allowability described in the **General Provisions for Selected Items of Cost (2 CFR Part 200.420-200.475)**.
- **Incurred during Fiscal Year** - Funds are incurred during the approved budget period (Fiscal year of the budget) for which they are allocated.
- **Resource Allocation Methodology/Plan (RAM/P) Development** - The RAM/P is developed in coordination by the Chief Officer of Human Relations and the Chief Financial Officer. The RAM/P details how the district equitably distributes State and local funds and resources to each of its schools before allocating federal funds. As detailed, RCPS provides funds to Title I schools on the same basis as it provides funds to non-Title I schools, thus allocating funds to schools without regard of the school's Title I status. The district uploads the RAM/P in the Consolidation Application to show that the methodology (RAM/P) to allocate state and local funds to schools results in each Title I school receiving all of the State and local funds it would otherwise receive if it were not receiving Title I, Part A funds. In other words, the RCPS RAM/P is "Title I neutral" in that it allocates State and local funds to schools without regard of Title I status. RCPS has documentation showing the equitable distribution of state and local funds and resources to each of its schools in the Consolidated Application.

Process for Carryover

Carryover funds are allocated by the Georgia Department of Education. Once carryover funds are allocated to the district, the funds are budgeted by the appropriate grant administrator. A budget amendment is entered into the Georgia Department of Education consolidated application by the appropriate grant administrator. The budget amendment is approved by the GaDOE Area Program Specialist. Once approved by the GaDOE Area Program Specialist the budget amendment is then approved by the Superintendent.

Once the budget amendment is approved at the state level, an email is received notifying the Chief Financial Officer, the Finance Director, and the Federal Programs Director that the budget amendment is approved. The appropriate Federal Programs administrator provides a copy of the approved budget amendment to the Finance Director and the Grants Manager. The approved budget amendment is entered into Munis to the appropriate fund, function, object, cost center, and program by the Grants Manager.

Segregation of Duties - GAO-14-704G Standards for Internal Controls for the Federal Government 10.03;10.12-10.14; 2 CFR 200.303(a)

Segregation of duties helps prevent fraud, waste, and abuse in the internal control system. The district considers the need to separate control activities related to authority, custody, and accounting of operations to achieve adequate segregation of duties. Segregation of duties can address the risk of management override. Management override circumvents existing control activities and increases fraud risk. The district addresses this risk through segregation of duties.

In an effort to ensure fidelity among all Federal Programs, the Rockdale County Public Schools employs a grant administrator and support staff to oversee the operations of Federal Programs. The grant administrators have direct authority and responsibility in regards to the budget and expenses of their grant.

It is the responsibility of the respective grant administrators to notify the Director of Finance and the Purchasing Director when an issue or discrepancy arises concerning purchase orders, payments, payroll, and/or journal entries to reduce and prevent errors, waste, and fraud. Unless stipulated otherwise by the federal award, the grant is governed by the policies and procedures adhered to by the Rockdale County Public School System.

The grant administrator and the Business Department are responsible for ensuring that the financial system accurately reflects the activities associated with the grant. The following are responsibilities of the grant administrator:

- Notify the Finance Director and Grant Specialist when the budget has been approved or amended.
- Monitor the budget and initiate budget transfers.
- Verify accurate account numbers and availability of funding for payments.
- Communicate with Human Resources (HR) any changes as to who should be paid or removed from the grant.
- Respect and protect the confidentiality of information that is personally identifiable.

The following are responsibilities of the Business Department:

- Establish the budget and make amendments and transfers in the financial system after approval and as requested by the federal program administrator.
- Provide financial reports for review to assist in capturing and reducing errors.
- Authorize and withdraw access to accounts.
- Make corrections to financial records when discrepancies are discovered.

- Provide financial reports for review to internal and external stakeholders.
- Respect and protect the confidentiality of information that is personally identifiable.

Rockdale County follows processes for segregation of duties.

Segregation of Duties for Purchasing

- Requisitions will be approved at the school or department-level by the appropriate administrator authorized to make purchasing decisions prior to being purchased.
- The grant administrator will review the requisitions for appropriateness and for proper account use. Once determined appropriate, the requisition will be approved and will be forwarded to the Purchasing Director for approval.
- The Purchasing Director will review the requisitions for appropriateness and for proper account use. Once determined appropriate, the requisition will be approved and returned to the requesting federal program area as a purchase order.

After the purchase has been made and all items received and verified, the school bookkeeper, grant administrator or designee will send the invoice to the administrator of the respective federal program for approval of payment. The administrator for the federal program will sign, date, and send the approved bill and purchase order to accounts payable for payment.

Written Procurement Procedures—2 CFR 200.317-200.322; 200.324-325; 200.327 Appendix II, Sections (A)(B)

Non-Federal Entities - RCPS implements procurement procedures that include a clear and accurate description of the technical requirements of the material, product or service being procured. RCPS has established a more restrictive threshold for procurement practices than those procedures outlined by the GaDOE. All non-Federal entities, including subrecipients of RCPS must follow the procurement standards in 2 CFR Sec. 200.318 (a) – 200.327

The purpose of the policies and procedures for purchasing shall be to enhance the educational program through efficient and effective procurement of products and services that best meet the needs of the Rockdale County Public Schools while maintaining sufficient controls over the use of public tax funds. Purchasing practices shall conform to federal, state, and local laws, policies, and procedures and to ethical business standards. Bid documents shall be retained for the length of time specified in the Records Retention Schedule. All purchases must be authorized by the Superintendent or designee and encumbered by the requisition/ purchase order system when possible. No purchase or obligation to purchase may be made or confirmed unless there are sufficient budgeted funds available to cover that purchase. Purchases may not be split in order to circumvent this policy.

There are methods that must be used when making purchases with federal funds. In some cases, these federal methods are less restrictive than the state and local requirements, if so then the local or state requirements must be followed. In all cases, the more restrictive requirements must be followed when making purchases with federal funds. Rockdale County’s methods are more restrictive and all programs, including non-Federal entities and subrecipients of RCPS, must follow the methods.

Ethical Practices

All funds held by the Board and its local schools, regardless of the source, are held in public trust. Therefore, all school District employees will approach all purchasing and procurement decisions as responsible stewards of public funds.

Employees of the school District shall not engage in unethical behavior or compromising practices in relationships, actions, and communications with any current or potential vendors/contractors. Further, they shall avoid even the appearance of impropriety with any current or potential vendors/contractors. Any employee who observes or suspects unethical behavior in the procurement of goods or services should report that behavior to the Superintendent (or designee).

The Rockdale County Board of Education through the Superintendent of Schools is responsible for purchasing materials, supplies, equipment or services; leasing equipment; contracting for renovations and construction of facilities; and purchasing, leasing, or contracting for any other items that may be required for the efficient operation of the school system.

All such purchases, leases or contracts shall be awarded contingent upon an appropriation of funds having been made and covered by unrestricted cash balances in the appropriate fund account. All purchases shall be in accordance with the policies of the Rockdale County Board of Education and the State Board of Education and in compliance with all applicable state and federal laws.

Purchases from board members or companies in which a board member has a controlling interest is prohibited.

Maintain Oversight

These purchasing regulations shall apply to all purchases involving the expenditure of District funds or funds provide by other sources (federal, state, local, grants, etc.) for use by the District. All purchases shall be made in accordance with applicable federal, state, and local laws, as well as the policies, rules, and regulations established by the Rockdale County Board of Education (“Board”) and the Georgia Department of Education (“GaDOE”). Any purchase made contrary to this policy shall be null and void and the Board and District shall not be bound by such purchase.

Purchases shall be based on sound business practices and in accordance with this policy and administrative purchasing procedures. All purchases shall be based upon acquisition of goods and services as determined to be in the best interest of the school system. Deliverables must be received, and appropriate contracted services must be rendered prior to any payment.

Upon receipt of the deliverables, the packaging slip showing all materials have been inventoried and the invoice will be sent to the Federal Programs Office for signatures. Signed invoices will be sent to the business office for payment. Upon rendered contracted services, the contractor will send an invoice to the appropriate school/department for approval. The signed invoice will be sent to the Federal Programs Office for signatures. The signed invoice will be sent to the business office for payment.

Purchase orders shall be initiated by the Purchasing Department from appropriately approved requisitions or other authorized documentation. The Purchasing Director or designee is responsible for verifying availability of funds for purchases and approving, if appropriate.

Purchasing

District/School bookkeepers enter requisitions in the RCPS financial system, MUNIS. Requisitions follow an approval process, 1) direct supervisor of the bookkeeper, 2) appropriate administrator of the federal grant/program, 3) direct supervisor of the federal program administrator, 4) Purchasing Director. Once the requisition has been approved through the process, it is converted to a Purchase Order in the Purchasing Department.

Domestic Preferences for Procurements (CFR 200.322)

As appropriate and to the greatest extent practicable and consistent with law, the non-federal entity should, to the greatest extent practicable under the Federal award, provide a preference for the purchase,

acquisition, or use of good, products, or materials produced in the United States (including but not limited to iron, aluminum, steel, cement, and other manufactured products). The requirements of this section must be included in all subawards including all contracts and purchase orders for work or products under this award.

- “Produced in the United States” means, for iron, steel products, that all manufacturing processes, from the initial melting stage through the application of coatings, occurred in the United States.
- “Manufactured products” means items and construction materials composed in whole or in part of non-ferrous metals such as aluminum; plastics and polymer-based products such as poly-vinyl chloride pipe; aggregates such as concrete; glass, including optical fiber; and lumber.

Contracts (Object Code 300)

Contract must be detailed enough to specify services being purchased/provided, when service must be delivered (date), names entering into contract, contract rate (total fee/per hour), timeframe of contract, method of payment where services will be provided (location), signatures/date, and other relevant information per 2 CFR 200.318(j).

In general, there are two types of contracts used by the Purchasing Department at RCPS. The contract types are as follows:

Purchase Order: A one-time fixed price transaction.

Standard Contract: Provides for purchase of actual needs of supplies and services for a specific period. Terms, conditions, and pricing are set based on RCPS estimates of need. Contracts must include:

- Services being purchased/provided
- Delivery date
- Names entering into contract
- Contract rate (total fee/per hour)
- Timeframe of contract
- Method of payment
- Where services will be provided (location)
- Signatures/dates
- Any other relevant information

Purchase Orders (POs) Thresholds:

- Purchases of \$1,000 or less shall be made based on best value and the least expense to the district.
- Purchases from \$1,001 to \$10,000 may be made at the school/department level provided two (2) written quotes are obtained and documentation of award justification is maintained by the school/department (purchaser) and available for periodic audit by the Chief Financial Officer (or designee).
- Purchases from \$10,001 to \$25,000 require three (3) written quotes secured by the school/department and approved by the Purchasing Department.
- Purchases exceeding \$25,000 and not already under contract- Require formal solicitation issued by the Purchasing Department.

Purchasing Limits

Acquisition of all goods and services from budgeted funds shall be subject to the following limits:

- A. Purchases up to \$1,000: Purchases of \$1,000 or less shall be made based on best value and the least

expense to the district.

- B. Purchases between \$1,001 and \$10,000: Purchases may be made at the school/department level provided two (2) written quotes are obtained and documentation of award justification is maintained by the school/department (purchaser) and available for periodic audit by the Chief Financial Officer or designee.
- C. Purchases from \$10,001 to \$25,000: These purchases require three (3) written quotes secured by the school/department and approved by the Purchasing Department. Quote specifications must be submitted by the school/department to the Purchasing Department with no less than one (1) week turn-around time. The Purchasing Manager (or designee) will review the quotes to determine best value/price. Upon award, the purchaser will be notified of the successful vendor/contractor and may proceed with the purchase. Copies of the documentation of award justification will be maintained by both the purchaser and the Purchasing Department and be available for periodic audit by the Chief Financial Officer (or designee).
- D. Purchases exceeding \$25,000: Purchases greater than \$25,000 shall be awarded through: 1) a competitive sealed bid process to the lowest responsible, responsive bidder based on price, bid specifications, and other terms specified in the bid and relevant documents or; 2) through a competitive request for proposal process where the best value shall be selected. Formal solicitations will be posted to the Rockdale County Public Schools (RCPS) website and on the Georgia Procurement Registry, if required by applicable law.
- The Purchasing Department is responsible for the administration of all formal solicitations with only a few exceptions.
 - When a formal solicitation is not administered by the Purchasing Department, it becomes the end user's responsibility to maintain compliance with Board policy and regulation and federal, state, and local law, and all procedural requirements regarding the solicitation, including but not limited to, documentation and award justification.

The public is welcome to attend the opening of any formal solicitation. At least three (3) District employees will be present to verify that appropriate solicitation procedures have been followed; preferably the administrator requesting the goods or service, the Purchasing Manager, and at least one other District employee at the Director level or higher.

E. Statewide Contracts: To the extent that a need exists for purchasing contracted services or equipment with Federal funds, RCPS may utilize Georgia's statewide contracts for the procurement of services in the same capacity as state agencies and universities. However, RCPS is still responsible for ensuring that all federal regulations for LEAs are followed. when utilizing these contracts:

- If utilizing a statewide contract for a Federal purchase between \$10,000 and \$250,000, a statewide contract should suffice with additional quotes (at least two total quotes).
- If using a statewide sole source contract, the district should either attempt to get additional quotes or document that the provider is a sole source for their individual needs.
- If utilizing a statewide contract for a purchase in excess of \$250,000, the district must ensure all federal requirements are met. Most purchases and services shall occur in the current fiscal year. If the purchase or service involves commitment beyond the current fiscal year, the purchase must comply with O.C.G.A. § 20-2-506.

Authorization for payment shall result from the receipt of materials as called for by a purchase order and

notification of safe arrival of materials by the receiver. Upon such notification in the Business Services offices bills will be paid. Payment is made only on completed orders.

In the event of construction of facilities or other major projects which are on a contract basis and not on purchase order basis, payment shall be authorized per contract with approval of the Superintendent Each Federal Program Director/Coordinator and/or Department Supervisor checks Georgia's System for Award Management (SAM) website, <https://www.sam.gov> prior to approving any purchase equal to or in excess of \$25,000 (across the Federal Programs' budget period) to ensure the vendor is not on the list of suspension and debarment.

Submitting Bids, Proposals, Quotes or Submittals 2 CFR 200.329(b), 200.320(c), 200.325(b)(c)

The specific solicitation will give specific instructions for submitting a bid, a proposal, a quote or a submittal. The following provides general guidance:

- A. Bid Openings:** Public bid openings occur at 960 Pine Street, NE, Conyers, GA 30012-4480 per the date and time specified in the solicitation. Vendors are encouraged to attend; however, it is not mandatory.
- B. Revision or Withdrawal of Bid:** A bid may be revised or withdrawn by the bidder prior to the bid opening date and with the permission of the RCPS Purchasing Manager. Requests to withdraw a bid, along with supporting documentation, shall be made in writing to the Purchasing Manager. After the bid opening, the RCPS Purchasing Manager will permit withdrawal only when the best interest of RCPS would be served. Generally, withdrawal will only be allowed in cases where there has been an honest mistake made in preparing the bid not resulting from negligence and the mistake is clearly ascertainable. If withdrawal is allowed, RCPS reserves the right to disqualify the withdrawing bidder from bidding on RCPS solicitations up to one year.
- C. Schedules (Bid, Proposal, Quote & Qualification):** All prices and related correspondence shall be submitted on the Solicitation Schedule furnished by the RCPS Purchasing Department or attached to said schedule or on a facsimile of such containing information required by solicitation documents. Extra copies of the solicitation documents are available in the Purchasing Department.

All documents shall be submitted in a sealed envelope addressed to the Purchasing Manager, Attention: Marki Dixon, 1062 North Street, Conyers, Georgia, 30012 plainly marked on the envelope as a bid (nomenclature, date, time of opening/submission, and the solicitation number) for the work as set forth in the solicitation.

- D. Examination of Solicitation Documents:** Bidders are notified that they must thoroughly examine solicitation documents which may include: Cover Sheet, Table of Contents, Advertisement, Bid Conditions, Additional Conditions, Specification, Bid Schedule, Drawings, General Conditions, and Technical Specifications together with Addenda thereto issued prior to the receipt of solicitation.
- E. Compliance with Laws:** All property or services furnished shall comply with all applicable Federal, State and Local laws, codes and regulations.
- F. Protests:** Protests dealing with the specification or the solicitation shall be filed not later than three (3) working days prior to proposal opening date. Other protests shall be filed not later than three (3) working days after proposal opening date, or if the protest is based on subsequent action of RCPS, not later than three (3) working days after the aggrieved person knows or should have

knowledge of the facts given rise to the protest. Protests are considered filed when received by the Purchasing Manager. Protests which are not filed in a timely manner, as set forth above will not be considered. Contractor agrees to pay for the School District's reasonable attorney's fee and expenses of litigation for any protest arising out of this solicitation in which the School District is a prevailing party. Only Contractors who participated in the solicitation are eligible to protest.

- G. Purchasing Policy:** The RCPS Purchasing Policy, Purchasing Procedures and Regulations are incorporated into all RCPS solicitations by reference. By acceptance of a RCPS solicitation, a bidder, potential bidder or contractor agrees to be bound by the RCPS Purchasing Policy and Purchasing Regulations in any issue or action related to the solicitation or subsequent contract resulting from the solicitations.
- H. Vendors Qualifications:** Before Contract Award, RCPS may require potential vendors to document that they are "responsible" to the complete satisfaction of RCPS. They may be required to show they have the necessary facilities, technical abilities, and financial resources to execute the work in a satisfactory manner and within the time specified, that they have had experience in work of a similar nature, and that they have past history and references to verify their qualifications for executing the work. RCPS has the absolute right to determine vendor responsibility and responsiveness to any solicitation issued.
- I. Tie Bids:** In the purchase of supplies or services by RCPS, prices and quality being equal, the tie will be resolved by any Georgia made goods, which are documented and verified. If the foregoing does not resolve the tie, then a coin toss in a public forum will be used.
- J. Rejection of a Bid:** Failure to observe these instructions and conditions will constitute grounds for rejection of a bid or removal from the list of bidders.

Bids will be rejected if:

1. The bidder's acceptance period is less than required acceptance period in the solicitation.
 2. The bidder fails to submit requested samples within the time specified by RCPS.
 3. The bid contains a minimum order/ship quantity or dollar value (unless called for in the solicitation).
 4. The bid contains a prepayment and/or progress payment requirement (unless called for in the solicitation).
 5. The bid fails to include all appropriate elements of all addenda issued to the solicitation.
 6. The bid contains terms and conditions, which conflict with the solicitation or RCPS regulations, or that otherwise, may be construed as qualifying the bid.
 7. The bid does not meet the terms and conditions of this solicitation or imposes terms and conditions not acceptable to RCPS.
- K. Additional Terms:** RCPS shall not be bound by any terms and conditions included in any bidder's packaging, service catalog, brochure, technical data sheet or other document which attempts to impose any conditions at variance with or in addition to the terms and conditions contained in the solicitation or the RCPS purchase order related to the solicitation or contract.
 - L. Taxes:** RCPS is exempt from all state sales tax and Federal Excise Tax. These taxes shall not be included in bids.
 - M. Charges and Extras:** Bids are to be firm net prices, F.O.B. destination to include all charges for delivery, unloading, placing in our buildings as directed by the authorities in the buildings, drayage, express, parcel post, packing, cartage, insurance, license fees, permits, costs of bonds and any other cost.

- N. **Solicitation Questions**: If a contractor contemplates bidding and is in doubt as to the meaning of any part of these documents, he may request an interpretation. This should be submitted in writing and addressed to the Purchasing Department, RCPS at 960 Pine Street, NE, Conyers, Georgia, 30012.
- O. **Addenda**: No oral interpretations will be made as to the meaning of any part of the solicitation documents. Interpretations will be made by addenda only. RCPS will not be responsible for any interpretations or explanations.
- P. **Reject and Waive**: The Owner reserves the right to reject any or all Bids and waive technicalities and informalities. The judgment of RCPS on such matters shall be final
- Q. **Insurance**: The solicitation may require insurance. Proof of Insurance will be required prior to contract award. To be acceptable, Insurance shall be issued by a surety company licensed by, and in good standing with, the Commissioner of Insurance of the State of Georgia, to do business as an insurance company in the State of Georgia. The insurance company shall have an A.M. Best rating of not less than A and an A.M. Best financial size category of not less than Class VII. Types of insurance required will be listed in the specific solicitation.
- R. **Bonds**: The solicitation may require bonding. If bid bonds are required, they must accompany the vendor's bid, or the vendor will be declared non-responsive. If payment, performance or other bonding is required, proof of bonds shall be furnished prior to contract award. To be acceptable, bonds will be issued by a surety company licensed by, and in good standing with, the Commissioner of Insurance of the State of Georgia, to do business as an insurance company in the State of Georgia. The insurance company shall have an A.M. Best rating of not less than A and an A.M. Best financial size category of not less than Class VII. Bonding requirements will be in the specific solicitation.
- S. **Options**: Often solicitations contain provisions for options. Failure on the vendor's part to fulfill obligations under the options clause contained in the appropriate solicitation will be viewed as a breach of contract. The contract will be terminated in whole or in part, at the discretion of RCPS, and the vendor will be liable for any increase in cost incurred by RCPS to secure the goods or services that were required by the contract. This obligation may be satisfied from funds owed to the vendor that become obligations of RCPS to the vendor, or by some manner of payment from the contractor to RCPS that is satisfactory to RCPS.
- T. **Termination for Default**: All contracts in excess of \$10,000 must address termination for cause and for convenience by the non-Federal entity including the manner by which it will be affected and the basis for settlement **2 CFR 200.327 Appendix II (B)**. Procedures for dealing with contractors who breach contract terms are included below **2 CFR 200.327 Appendix II (A)**.
1. In the event any property or service to be furnished by the contractor under a contract or purchase order should for any reason not conform to the specifications contained herein or to the sample submitted by the vendor with the bid, the RCPS may reject the property or service and may terminate the contract for default.
Prior to a termination for default, a contractor will be given the opportunity to respond to a "cure" notice "and/or a show cause notice". In either case, the contractor will be expected to either correct the offending situation or provide an acceptable plan and time frame for correction within five days of receipt of either notice. Failure to do so will be cause for termination.

In such event, with specific instructions by the Purchasing Department, the contractor shall immediately remove the property without expense to RCPS and replace all rejected property with such property or services conforming to the specifications or samples.

2. If the contract is terminated for default, RCPS may procure such property or services from another source and shall have the absolute right to deduct from any monies due the contractor or that may thereafter become due to the contractor, the difference between the contract price and the actual cost of the property or service to be replaced or substituted. Price paid by the RCPS in such event shall be the prevailing market price at the time the substitute purchase is made.
3. Failure by a contractor to perform on delivery of goods or Services as specified may also result in the removal of the contractor from doing business with RCPS for a period of up to one year.

U. Termination for Convenience: RCPS reserves the right to terminate for convenience, at any time for any reason with no penalty, any contract awarded through this solicitation by providing the Contractor with thirty (30) days written notice.

V. Delivery: Time of delivery is a part of the solicitation and an element of the contract that is to be awarded. If the offeror cannot meet the required delivery date, a proposal should not be submitted. Offerors may provide alternative schedules and/or delivery dates in their proposals. Time shall be stated in “calendar” days. Failure to deliver in accordance with the contract awarded could result in the contractor being declared in default.

Standard Procedures for Entering into Contracts, Purchases, and Leases

The Rockdale County Board of Education recognizes that the purpose of entering into agreements for services (including, but not limited to, certain types of insurance, pest control, fire extinguishers, etc.) does not necessarily lend itself to the annual competitive bidding process, as does the purchase of equipment, goods, and materials. Therefore, the Superintendent shall have the authority to negotiate with agents or suppliers of such services to extend the services being provided for an additional year at a cost not to exceed 10% of the original quote by the same providers without the necessity of going through a bidding process.

All contracts must include services being purchased/provided, date service will be delivered, names entering into contract, contract rate (total fee/per hour), timeframe of contract, method of payment, where services will be provided (location), signatures/ date, and any other relevant information. **2 CFR 200.318(j).**

A. Contract Review

1. Review of contracts prepared by General Counsel is not required unless the contract has been materially modified.
2. Review of contracts by General Counsel for contracts \$50,000 or less is not required. However, the Superintendent or designee shall have the discretion to seek General Counsel’s review of such contracts.
3. General Counsel must review all contracts over \$50,000, except for contracts originally prepared by General Counsel and not materially modified. In reviewing contracts, the General Counsel must approve the form of the contract as legally enforceable, in compliance with Georgia law, and does not expose the District to any unreasonable legal exposure.

4. Upon signing a contract, the Superintendent certifies that Board policies have been followed, and that sufficient funds are available and approved by the Board for that purpose.
5. Contracts executed by the Superintendent or designee should be submitted to the Board in an open meeting and recorded in Board minutes.

B. Contract Reporting and Authority to Sign Contracts

1. The Superintendent or designee may sign contracts up to \$50,000 in value. Contracts executed by the Superintendent or designee should be submitted to the Board in an open meeting and recorded in Board minutes.
2. The Chair or Vice Chair must sign all Board-approved contracts in excess of \$50,000 and all contracts involving the sale, purchase, or lease of real property, and projects involving architects.
3. All contracts in excess of \$50,000 must be approved by the Board in an open meeting and recorded in Board minutes.
4. Upon submitting a contract for board approval, the Superintendent certifies that Board policies have been followed and that sufficient funds are available and approved by the Board for that purpose.
5. In approving these contracts, the Board may condition its approval upon final approval by the General Counsel and Superintendent. If General Counsel expresses any qualifications to the approval of a contract, General Counsel will notify the Superintendent and Board in writing. Notwithstanding any qualifications, the Superintendent and Board retain the discretion and authority to enter into any contract that they determine to be legal and commercially reasonable under the circumstances.

C. The Superintendent or designee shall maintain originals of all district contracts. Upon request, the Superintendent or designee shall provide certified copies of district contracts. All school contracts shall be maintained at the school by the principal or designee.

D. For purposes of this regulation: District contract means all contracts involving the district as a whole or multiple schools.

Multi-year Contracts

RCPS requires Title I contracts to be from August 1 through July 31 of the fiscal year in which the money is allocated. In the event of multi-year contracts, the contract must include the opt-out clause, "If Title I funds are no longer available, the contract will be void."

Request for Proposal Process

In using the Request for Proposal (RFP) method for solicitation, we are asking the marketplace for its best effort in seeking a "best value" solution to our requirement. The offeror providing proposals will be evaluated by an evaluation committee. Offerors should make their best effort to satisfy the requirement at their best price because a contract may be awarded based on the initial evaluation. Often, however, it will be necessary to hold discussions with offerors about their proposals. This will be done after the initial evaluation. The results of the evaluation will be reviewed and a "competitive range" will be selected for discussions. Essentially, if a contractor's proposal is not evaluated as having a chance for contract award because of the content of the proposal and/or the price, the proposal will be dropped from the competitive range to save time and money for both the contractor and Rockdale County Public Schools.

Offerors in the “competitive range” will be notified of the weaknesses in their proposals and given an opportunity, in discussions, to assure they understand the weaknesses. At the end of discussions with all offerors, Best and Final Offers (BAFOs) will be accepted from the offerors in the competitive range.

The BAFOs will be evaluated and the results reported to a selection official who will select the proposal that presents the best value to Rockdale County Public Schools. This selection will then be presented to the Rockdale County Board of Education for approval. If approved by the Board and other matters (insurance, bonds, etc.) are settled, a contract will be awarded.

Emergency Purchases

In the case of an emergency, the Superintendent or authorized designee shall have authority to purchase goods and services to the extent of the emergency. An emergency situation is one in which, if not accomplished immediately, would: (a) result in jeopardizing the health or safety of students and/or staff; or (b) prevent interruption of the instructional program; or (c) cause irreparable harm to the district if delayed.

For all emergency purchases, supporting documentation shall be maintained by the designated District official. Emergency purchases of \$50,000 or greater shall be reported to the Board of Education at the next work session or regular meeting.

Open Purchase Orders

1. All signed documentation must be attached to the purchase order documenting such purchases as they are made.
2. Once the total has been documented, a copy of the purchase order, along with the documentation, must be submitted to accounts payable for payment.

Purchase Order and Payment Authorization

- Once a purchase order has been properly authorized, the requestor may submit the purchase order to the vendor.
- Upon receipt of the material at the site of the requester, the order must be checked in by an authorized employee at the site. Discrepancies in the purchase order and items received should be reported to the Purchasing Director immediately.
- The receiving site must forward a signed copy of the purchase order with attached documentation to the administrator of the federal program. The federal program administrator will sign off and send to Accounts Payable. Payment will not be made until the documentation has been received and approved by the appropriate federal program administrator. Any late payment charges caused by the requestor will be charged against the requester’s account.

Returned Purchases

Should items need to be returned to the vendor, the requester should contact the vendor for return instructions. A copy of the purchase order marked with items returned must be forwarded to the appropriate federal program administrator. The federal program administrator will sign the purchase order and send to the business office for processing.

Canceled Purchase Orders

It is the responsibility of the requisitioner to notify the vendor if an order needs to be canceled. Once the vendor has been notified, the requisitioner must also notify the Purchasing Department and his/her approver (i.e. principal or administrator) via e-mail. The requisitioner shall provide all necessary information in the e-mail to facilitate the cancellation, including but not limited to, the reason for the cancellation, PO number, amount of lines to cancel, etc.

Unauthorized Purchases

It is prohibited for any employee to purchase or contract to purchase any goods or services in any form not described herein. Failure to abide by these regulations may result in disciplinary action, including termination. Any purchase made contrary to these established purchasing regulations shall be null and void and the Board and District shall not be bound thereby, unless the Board ratifies the purchase or contract in a public meeting at its sole discretion.

Parent Involvement Food Purchases

All food purchases for parent involvement activities will follow pre-approval procedures as outlined in the Title I Handbook. These procedures include an itemized listing of food items to be purchased along with a copy of the program flyer to be approved prior to the purchase. Requests for food purchases from a vendor also require pre-approval prior to placement of order. Purchases are not to be excessive, nor can items be stocked/stored for later use. Any changes made to a purchase must also be approved by the Title I Director with appropriate documentation attached to the original requisition. At no time can items be returned without pre-approval from the Title I department and assurance that the items will be credited to the Title I account.

Use of Kroger Card for Parent Involvement Purchases

The Kroger Credit Card is available in the Title I department for check-out, to purchase **light snacks** for your Title I parent involvement meetings. The following criteria must be followed prior to and after the meetings in order to meet federal guidelines.

1. **Pre-approval is required for all purchases.** Email a copy of the program flyer to the Title I department before picking up the card. The event **must** be Title I related and provide technical assistance and support to educate parents. Title I funds cannot be used for refreshments for awards, celebrations or receptions.
2. Please submit a **list of items** to be purchased for pre-approval. **Light snacks only** are to be provided. Keep purchases comparable to the number of participants you have had in the past.
3. Please email/call ahead of time to reserve card. This will ensure it is available when you come to pick it up.
4. Once a purchase has been made, the original store receipt and card must be returned to the Title I department. The card must be signed out and back in the same day. It cannot be checked out overnight under any circumstance.

Copies of sign-in sheets and meeting agendas are to be forwarded to the Title I department immediately following your meeting.

Technical Evaluation of Competitive Proposals and Selecting Recipients – 2 CFR 200.320(d)(3); 200.318(d)(e)(f); 200.319

Rockdale County Public Schools shall ensure that the process of procuring goods and services is fair and equitable by taking the following measures:

- Incorporating a clear and accurate description of the technical requirements for the material, product, or service to be procured. The description must not, in competitive procurements, contain features which unduly restrict competition. The description may include a statement of the qualitative nature of the material, product or service to be procured and, when necessary, must set forth those minimum essential characteristics and standards to which it must conform if it is to satisfy its intended use.

- Avoid providing detailed product specifications.
- When it is impractical or uneconomical to make a clear and accurate description of the technical requirements, a “brand name or equivalent” description will be used as a means to define the performance or other salient requirements of procurement. The specific features of the named brand which must be met by offers will be clearly stated.
- Identify all requirements which the offers must fulfil and all other factors to be used in evaluating bids or proposals.
- Ensure that all prequalified lists of persons, firms, or products which are used in acquiring goods and services are current and include enough qualified sources to ensure maximum open and free competition. Also, the school system will not preclude potential bidders from qualifying during the solicitation period.

The RCPS Board of Education may reject any or all bids. The Board may, in its judgment, consider such factors as service, location, and timeliness of delivery; therefore, they may accept the bid that appears to be in the best interest of the school system even if it is not the lowest bid. The Board reserves the right to waive any formalities in or reject any or all bids or any part of any bid. Any bid may be withdrawn prior to the scheduled time for the opening of bids.

Contracts binding the school district can be made on by the Board or the Superintendent or approved agent.

Methods of Procurement

Procurement with Federal funds is based on one of four levels:

- Micro-Purchase (\$0-\$10,000)
- Small Purchase (\$10,000-\$250,000)
- Sealed Bids (>\$250,000)
- Competitive Proposal (>\$250,000)
- Sole Source

RCPS has established a more restrictive threshold for procurement practices as indicated below:

Informal Procurement Methods

- Purchases of \$1,000 or less shall be made based on best value and the least expense.
- **Micro-Purchase** - Purchases between \$1,001 and \$10,000: Purchases may be made at the school/department level provided two (2) written quotes are obtained by the school/department and approved by the appropriate federal program administrator and the Purchasing Department. Documentation of award justification is maintained by the school/department (purchaser) and available for periodic audit by the Chief Financial Officer or designee.
- **Small Purchase** - Purchases from \$10,001 to \$25,000: These purchases require three (3) written quotes secured by the school/department and approved by the appropriate federal program administrator and the Purchasing Department. Quote specifications must be submitted by the school/department to the Purchasing Department with no less than one (1) week turn-around time. The Purchasing Manager (or designee) will review the quotes to determine best value/price. Upon award, the purchaser will be notified of the successful vendor/contractor and may proceed with the purchase. Copies of the documentation of award justification will be maintained by both the purchaser and the Purchasing Department and be available for periodic audit by the Chief Financial Officer (or designee).

Formal Procurement Methods

Purchases exceeding \$25,000: Purchases greater than \$25,000 shall be awarded through:

- **Competitive sealed bid** process to the lowest responsible, responsive bidder based on price, bid specifications, and other terms specified in the bid and relevant documents or;
- **Competitive proposal** process where the best value shall be selected.

Formal solicitations will be posted to the Rockdale County Public Schools (RCPS) website and on the Georgia Procurement Registry, if required by applicable law.

Solicitation Process

A. **Formal Solicitation:** The solicitation will follow four basic formats:

1. **Invitation for Bid (IFB)** – Bids will be opened in public and award will be made to the lowest priced, responsible, responsive bidder.
2. **Request for Proposals (RFP)** – Proposals are evaluated by a committee and award of a contract is based on “best value.” (See Request for Proposal Process)
3. **Request for Qualifications (RFQu)** – Submittals are evaluated, usually by a committee, and award of a contract is based on “best qualified.”
4. **Request for Quotes (RFQ)** – Quotes are received, and an award will be made to the lowest priced, responsible, responsive quoter.

B. **Notification of Solicitations:** RCPS posts all Invitation for Bids, Request for Proposals, Request for Qualifications and addenda on our website:

www.rockdaleschools.org/departments/financial_services/purchasing where you can also register as a vendor by completing the vendor application. It is suggested that vendors monitor the website on a frequent basis. Vendors registered are notified by e-mail when a solicitation within their commodity group is posted

C. **Late Bids, Proposals, Quotes and Submittals:** Bids, proposals, quotes and submittals must be received by the time and date stated in the solicitation or they will not be accepted. No exception will be made to this policy.

D. **Pre-Bid/Proposal Conference:** Pre-bid/proposal conferences are held to clarify specifications, answer vendor questions, and, in some cases, perform an on-site inspection.

E. **Addenda:** Addenda may be required based on many factors, including but not limited to, written questions submitted, questions asked at pre-bid/proposal conferences or changes to the RCPS requirement. Changes to the solicitation will be made by addenda posted to the RCPS Purchasing Department Department’s website www.rockdaleschools.org/departments/financial_services/purchasing. It is the vendor’s responsibility to monitor the site for addenda to solicitations for which they have an interest.

The Superintendent or his designee will be responsible for reviewing the procedures to be certain all state and local Board of Education requirements for using non-competitive procurements are met.

Informal Procurement Methods:

Purchases of \$1000 or less shall be made based on best value and the least expense.

Micro-Purchase: Procurement by micro-purchase is the acquisition of supplies or services, the aggregate

dollar amount of which does not exceed the micro-purchase threshold (§200.200 Micro-purchase) of \$10,000.00, but this threshold is periodically adjusted for inflation.

- RCPS will calculate the aggregate dollar amount for each purchase order of supplies or services.
- To the extent practicable, RCPS must distribute micro-purchases equitably among qualified suppliers.
- RCPS will take all necessary affirmative steps to assure that minority businesses, women's business enterprises, and labor surplus area firms are used when possible. 2 CFR 200.321
- If micro purchase procedures are used, price or rate quotations must be obtained from an adequate number (at least 2) of qualified sources (similar source vendors) as determined appropriate by non-federal entity.
- Micro-purchases may be awarded without soliciting competitive quotations if the non-federal entity considers the price to be reasonable based on research, experience, purchase history, other information, and documents its files accordingly.
- The non-Federal entity is responsible for determining and documenting an appropriate micro-purchase threshold based on internal controls, an evaluation of risk, and its documented procurement procedures.

Small Purchases: Small purchase procedures (§200.320) are those relatively simple and informal procurement methods for securing services, supplies, or other property that do not cost more than the simplified acquisition threshold (§200.88) of \$250,000.00 (**\$25,000 for RCPS**).

- If small purchase procedures are used, price or rate quotations must be obtained from an adequate number (at least 3) of qualified sources as determined appropriate by non-federal entity.

Formal Procurement Methods

Sealed Bids (greater than \$25,000): Procurement by sealed bids (formal advertising) are when bids are publicly solicited, and a firm fixed price contract (lump sum or unit price) is awarded to the responsible bidder whose bid, conforming with all the material terms and conditions of the invitation for bids, is the lowest in price (§200.329(b)). The following conditions must be present for sealed bids:

- A complete, adequate, and realistic specification or purchase description is available.
- Two or more responsible bidders are willing and able to compete effectively for the business.
- The procurement lends itself to a firm fixed price contract and the selection of the successful bidder can be made principally on the basis of price.

If sealed bids are used, the following requirements apply:

- The RCPS Purchasing Department is responsible for the administration of all formal solicitations.
- Formal solicitations are posted on the RCPS website as well as the GPR by the Purchasing Director.
- The RCPS Purchasing Director is responsible for ensuring technical evaluations are conducted in compliance with Federal regulations.
- Bids must be solicited from an adequate number of known qualified sources, providing them sufficient response time prior to the date set for opening the bids, for local, and tribal governments, the invitation for bids must be publicly advertised.
- The invitation for bids, which will include any specifications and pertinent attachments, must define the items or services in order for the bidder to properly respond.
- All bids will be opened by the Purchasing Director at the time and place prescribed in the invitation for bids, and for local and tribal governments, the bids must be opened publicly.
- A firm fixed price contract award will be made in writing to the lowest responsive and responsible bidder. Where specified in bidding documents, factors such as discounts, transportation cost, and life cycle costs must be considered in determining which bid is lowest. Payment discounts will only be used to determine the low bid when prior experience indicates that such discounts are usually taken advantage of.

- Any or all bids may be rejected if there is a sound documented reason.

Competitive Proposals (greater than \$25,000) §200.320(c): Procurement by competitive proposals is normally conducted with more than one source submitting an offer, and either a fixed price or cost reimbursement type contract is awarded. It is generally used when conditions are not appropriate for the use of sealed bids. If this method is used, the following requirements apply:

- Requests for proposals must be publicized and identify all evaluation factors and their relative importance. Any response to publicized requests for proposals must be considered to the maximum extent practical.
- Proposals must be solicited from an adequate number of qualified offerors.
- The system must have a written method for conducting technical evaluations of the proposals received and for selecting recipients.
- Contracts must be awarded to the responsible offeror whose proposal is most advantageous to the program, with price and other factors considered.

Noncompetitive Proposals (§200.320(f)):

Whenever possible, single source purchases will be avoided. Single source procurement will only be used when it has been proven there is no competition. A sole response does not meet this standard. A vendor's statement or literature stating their company is the only source will not be accepted. All claims to single source will be vetted by issuing a competitive solicitation first. All steps taken for the non-competitive procurement will be addressed in the procurement plan.

Procurement by noncompetitive proposals (sole source) is conducted through solicitation of a proposal from only one source and may be used only when one or more of the following circumstances apply:

- The aggregate dollar amount does not exceed the micro-purchase threshold.
- The item is available only from a single source (RCPS requires additional quotes from similar source vendors).
- The public exigency or emergency for the requirement will not permit a delay resulting from competitive solicitation.
- The federal awarding agency or pass-through entity expressly authorizes non-competitive proposals in response to a written request from the system.
- After solicitation of several sources, competition is determined inadequate.

If it is determined the non-competitive procurement method will be used, the RCPS Purchasing Director or designee must do its due diligence with the provider to get the best price possible. Before moving forward, the RCPS Purchasing Manager will discuss the situation with the Chief Financial Officer. The Purchasing Director or designee will be responsible for the documentation of records to fully explain the decision to use the non-competitive procurement. The records will be maintained and available for audit and review.

Procurement by sole source should be limited. ***Rockdale County Title I Department will not accept sole source and requires additional quotes from similar source vendors.**

Conflict of Interest Policy – 2 CFR Sec. 200.318(c)(1)

Definition: A situation in which a person is in a position to derive personal benefit from actions or decisions made in their official capacity. 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.

Standards of Conduct: Employees of the Rockdale County School System who are engaged in the selection, award and administration of contracts shall abide by the following:

- No employee, officer, or agent may participate in the selection, award, or administration of a contract supported by a federal award if he or she has a real or apparent conflict of interest.
- No employee, officer or agent may participate in selection, award, or administration of a contract supported by a federal award if he/she has a real or apparent conflict of interest.
- Officers, employees, and agents of the Rockdale County 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.
- Any violation of these procedures must be disclosed, in writing, in a timely manner. All violations of federal criminal law involving fraud, bribery, or gratuity violations potentially affecting the federal award must be reported as failure to make disclosures can result in legal action.

Reporting Potential Conflicts of Interest

Staff, to include any employee involved in a potential conflict of interest, shall immediately report potential conflicts of interest to their immediate supervisor and/or the superintendent/designee, who shall have the primary responsibility for initiating necessary investigations.

Nominal Items

There are situations in which the financial interest is not substantial or the gift is an unsolicited item of nominal value. These items are reasonable and not given in order to improperly influence business decisions. Employees shall not accept personal gifts, bonuses, refunds, entertainment, or other items of monetary value or cumulative value greater than \$25 in any one fiscal year from vendors or potential vendors of service(s) or product(s). Violation of this "no-gift rule" by employees shall be reason for adverse employment action against the employee.

Best Practices for Training

The following best practices will be used to avoid conflicts of interest:

- Ensuring that all purchases follow the guidelines outlined in this handbook.
- Checking with supervisors when in doubt if a conflict of interest may occur.

Conflict of Interest Training

All RCPS employees are required to annually complete the mandated online Compliance Modules (training) during the first month of the school year or within their first month of employment. To ensure that all employees complete the required modules, the Director of Professional Learning monitors an activity report and provides the names of all persons completed to each school Principal and county office supervisor. One of the required modules in the series is **Conflict of Interest**.

Dissemination of the Policy

RCPS displays the Conflict of Interest policy on the district portal and it is included in the handbooks.

Signed Certifications

All RCPS employees are required to annually complete the mandated online Compliance Modules

(training) during the first month of the school year or within their first month of employment. Upon completion of the module, employees are provided with a certificate showing they completed the module. The certification process also provides the Professional Learning Director with a list of names of certificate completion. The Professional Learning Director provides each principal and district leader with a list of names for certificate completion. It is the responsibility of each principal and district leader to ensure that all employees have received a certificate of completion by the required deadline. Failure to meet the deadline is reported to HR as insubordination, which could result in termination.

Georgia Professional Standards Commission Code of Ethics

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

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

Board Member Conflict of Interest, Policy BHA

The following will be used to avoid conflict of interest by Board of Education members:

The Rockdale County Board of Education ("Board") desires to operate in the most ethical and conscientious manner possible, and to that end the Board adopts this Conflict of Interest Policy and each member of the Board agrees that he or she will:

Financial Governance

1. No Board member shall use or attempt to use his or her official position to secure unwarranted privileges, advantages, employment for himself or herself, or any of his or her immediate family members, or others.
2. No Board member shall act in his or her official capacity in any matter in which he or she, any of his or her immediate family members, or any business organization in which he or she has a material financial interest, that would reasonably be expected to impair his or her objectivity or independence of judgment. Compliance with O.C.G.A. § 20-2-505 shall not constitute a violation of this paragraph.
3. No Board member shall solicit or accept or knowingly allow any of his or her immediate family members or any business organization in which he or she has an interest to solicit or accept any gift, favor, loan, political contribution, service, promise of future employment, or other thing of value based upon an understanding that the gift, favor, loan, contribution, service, promise, or other thing of value was given or offered for the purpose of influencing that Board member in the discharge of his or her official duties. This paragraph shall not apply to the solicitation or acceptance of contributions to the campaign of an announced candidate for elective public office if the local board of education member has no knowledge or reason to believe that the campaign contribution, if accepted, was given with the intent to influence the local board of education member in the discharge of his or her official duties. For purposes of this paragraph, a gift, favor, loan, contribution, service, promise, or other thing of value shall not include the items contained in subparagraphs (a)(2)(A) through (a)(2)(J) of O.C.G.A. §16-10-2.
4. No Board member shall use, or knowingly allow to be used, his or her official position or any information not generally available to members of the public which he or she receives or acquires

in the course of and by reason of his or her official position for the purpose of securing financial gain for himself or herself, any of his or her immediate family members, or any business organization with which he or she is associated.

5. No Board member or any of his or her immediate family members or any business organization in which he or she has an interest shall represent any person or party other than the local board of education or local school system in connection with any cause, proceeding, application, or other matter pending before the local school system in which he or she serves or in any proceeding involving the local school system in which he or she serves.
6. No Board member shall be prohibited from making an inquiry for information on behalf of a constituent if no fee, reward, or other thing of value is promised to, given to, or accepted by the local board of education member or any of his or her immediate family members in return therefor.
7. No Board member shall be deemed in conflict with these provisions if, by reason of his or her participation in any matter required to be voted upon by the local board of education, no material or monetary gain accrues to him or her as a member of any profession, occupation, or group to any greater extent than any gain could reasonably be expected to accrue to any other member of that profession, occupation, or group.
8. No Board member may also be an officer of any organization that sells goods or services to that local school system, excepted as provided in Code § 20-2-505 and excluding nonprofit membership organizations.
9. No Board member shall sell to any county board any supplies or equipment used, consumed, or necessary in the operation of any public school in this state unless there are fewer than three sources for such supplies or equipment within the county; provided, however, that any purchase pursuant to this subsection for supplies or equipment that is equal to or greater than \$10,000.00 shall be approved by a majority of the members of the Board in an open public meeting. Any member violating this shall be guilty of a misdemeanor.
10. No local board may do business with a bank or financial institution where a Board member is an employee stockholder, director or officer when such member owns 30% or more stock in that institution.
11. No Board member may have a financial interest in school buses, bus equipment or supplies, provide services for buses owned by the Board, or sell gasoline to the Board from a corporation in which the Board member is a shareholder.

No Board member shall accept a monetary fee or honorarium in excess of \$101.00 for a speaking engagement, participation in a seminary, discussion panel, or other activity which directly relates to the official duties of that public officer or the office of that public officer. Actual and reasonable expenses for food, beverages, travel, lodging, and registration for a meeting which are provided to permit participation in a panel or speaking engagement at the meeting shall not be monetary fees or honoraria.

Board and Community Relations

No Board member shall disclose to or discuss any information which is subject to attorney-client privilege belonging to the local board of education to any person other than other Board members, the Board attorney, the local school superintendent, or persons designated by the local school superintendent for such purposes unless such privilege has been waived by a majority vote of the whole Board.

Written Personal Compensation Policies—2 CFR §200.430(a)(1); SBOE 160-3- 3-.04

Compensation for personal services includes all remuneration, paid currently or accrued, for services of employees rendered during the period of performance under the federal award, including but not necessarily limited to wages and salaries. Costs of compensation are allowable to the extent that the compensation:

- Satisfies the specific requirements of the federal award.
- Is reasonable for the services rendered as compared to similar work activities of other non-federally funded Rockdale County Public School (RCPS) employees or for similar work in the labor market in which the system completes.
- Conforms to the established written policies of RCPS consistently applied to both federal and non-federal activities.

No Board member shall vote on the employment or promotion of any of his or her immediate family members. No immediate family member of a Board member may be employed or promoted unless a public recorded vote is taken separately from all other personnel matters.

Eligibility

No Board member shall:

- be employed in any position in the school district in which they serve.
- hold another county office.
- be employed by the State Department of Education or serve concurrently as a member of the State Board of Education.
- serve on the governing body of a private elementary or secondary educational institution.

Each member of this Board understands and acknowledges that no person shall be eligible for election as a member of a local board of education unless he or she:

- has read and understands the Code of Ethics and the Conflict of Interest provisions applicable to members of local board of education and has agreed to abide by them; and
- has agreed to annually disclose compliance with the State Board of Education's policy on training for members of local boards of education, the Code of Ethics of the local board of education, and the Conflict of Interest provisions applicable to members of local boards of education.

Each person offering his or her candidacy for election as a member of a local board of education shall file an affidavit with the officer before whom such person has qualified for such election prior to or at the time of qualifying, which affidavit shall affirm that he or she meets all of the qualifications required pursuant to this subsection. This subsection shall apply only to local board of education members elected or appointed on or after July 1, 2010.

Payroll

The federal program administrators will work with the Finance Director to ensure payroll reports are accurate. In addition, each Program Director/Coordinator ensures that the number of federally-funded employees is consistent with the approved application. Monthly payroll reports, expenditure summary and detail reports, and substitute reports will be used to ensure that each object code is accurate. Program Directors/Coordinators receive a monthly report by fund that shows the names of the personnel paid with Federal funds. The monthly report is reviewed by the Directors/Coordinators of their respective Federal Program to ensure that the report matches personnel names submitted on the budget sheet by the school Principal. If the names do not match, an in-depth review occurs and any discrepancies are resolved

through payroll transfers and/or journal entries. The payroll report is reviewed monthly by the respective Program Director/Coordinator.

Check and Balance for Ensuring Payroll Corresponds with Personnel

Federal Program Directors/Coordinators work with the HR Department and Business Services to ensure payroll reports are accurate. In addition, each Program Director/Coordinator ensures that the number of federally funded employees is consistent with the approved CLIP. Monthly payroll reports, expenditure summary and detail reports, and substitute reports will be used to ensure that each object code is accurate.

The following steps are taken to make sure there is a check and balance for ensuring federal funded payroll reports corresponds with appropriate personnel:

- Each month the Finance Reporting Manager submits a detailed monthly payroll report to the Director/Coordinator of each Federal Program.
- The Federal Programs Directors/Coordinators matches the payroll expenditures with the names of those funded in each Federal Program.
- Any discrepancies are noted and corrected by the Finance Reporting Manager at the request of the Federal Programs Directors/Coordinators.

Contracted Services

The Federal Programs Director will work with the HR Director and Finance Director to ensure compliance and accuracy. Each Program Director/Coordinator ensures that contracts are fulfilled, budgeted correctly, and that services were provided in accordance with the purchased services contract

Time and Effort Internal Controls – 2 CFR Sec. 200.430

RCPS maintains time and effort records for all employees whose salaries or other compensation are paid in whole or in part with federal funds (not to exceed 100%). Monthly Munis payroll report details are reviewed by the Directors/Coordinators of Federal Programs to ensure that time worked is in agreement with the payroll charge to the Federal Program in the accounting system. The Directors/Coordinators of Federal Programs meet with the Finance Director and Chief Academic Officer as needed to discuss the current state of all the Federal Program funds. Each month, the following are reviewed to assure that charges are accurate, allowable and properly allocated to support Time and Effort records:

- Activities, for which employees are compensated, are reviewed and signed off on by designated administrative staff at various levels before they are processed.
- Professional Learning charges are reviewed prior to approval by the Program Director/Coordinator.
- The system procedure (via electronic program) for the approval of charges is followed by the system staff members.
- The system Financial Accounting Handbook is followed.

Federal and state guidelines regarding expenditure of Federal funds are followed. Federal funds expended on personnel are monitored separately through payroll reports (Munis). Periodic certifications for Federal Programs verify that duties and schedules are consistent with the positions. Periodic certifications are collected twice yearly (January and May) for those Federally funded staff members who are paid 100% with Federal funds. Rockdale County does not split fund personnel. In the event that this changes, split-funded personnel will submit monthly time logs that document the amount of time spent on Federal Programs.

Periodic Certifications

A semi-annual periodic certification will be maintained for any employee who worked on any federal grant or cost objective (job). These certifications will

- be completed after-the-fact,
- account for the total activity performed, and
- be signed by the supervisory official having first-hand knowledge of the work performed by the employee.

The periodic certification form is used to certify that the employees listed worked 100% of their time solely on activities in the specified positions as authorized by the designated federal program(s) listed. After-the-Fact Periodic Certifications are sent to all supervisors listing 100% paid federal program staff and any other federal program paid individual (translators/interpreters, substitutes contracted service vendors) under their supervision. Principals also receive periodic certifications listing all staff/contracted service vendors who were paid with federal funds at their location.

The certification forms are completed by the grant administrative assistant or designee with the use of the Leave Reports, as well as monthly Expenditure and Payroll Reports. The periodic certifications are reviewed by each supervisor, attesting that these staff members performed work meeting federal programs compliance requirements. Any corrections are made as needed by the grant administrative assistant or designee. Since the form is an after-the-fact certification of time worked, the supervisor will sign and date verifying the work of the listed employees after the period of time listed and upon receipt from the federal grant administrative assistant or designee.

The certification will be completed at the end of the first semester and at the end of June (or on the last contracted day of the school year for employees who do not work year-round) and will be completed with one form per work site. The forms are signed, collected, reviewed, approved as appropriate by the applicable grant administrator, and kept on file in the office of the appropriate federal fund Director/Coordinator for monitoring documentation.

Split-Funded Personnel (PARS)

Rockdale County does not allow split-funded personnel. In the event split-funded personnel are allowed, a Personnel Activity Report (PAR) or time log will be required for staff working on multiple cost objectives and account for the total activity of the staff. Split-funded personnel are required to maintain a monthly time log delineating the specific federal grant and non-federal grant duties or other federal program duties performed.

Split-funded staff are provided the current time log listed on the GaDOE website by the federal grant administrator or designee by the first day of work for the applicable school year. The time log used will depend on the number of funding sources.

Detailed monthly time logs must:

- Reflect an after-the-fact distribution of the actual activity of each employee.
- Account for the total activity for which each employee is compensated.
- Coincide with one or more pay periods.
- Be signed and dated by the employee after the fact.
- Be signed and dated by the supervisor having first-hand knowledge of the work performed by the employee after the fact.

Additionally, the fixed schedule must identify the cost objective/fund source for each time period. Employee schedules identifying the time funded by all fund sources may be used if the personnel have a fixed daily schedule.

The following procedures for time logs must be followed:

- Time logs must be completed in the excel workbook provided to ensure that the hours for month and year to date calculate correctly.
- Completed time logs are submitted to the immediate supervisor for review and approval (signature and date).
- Completed time logs must be submitted to the federal grant administrator by the subsequent month (completed and submitted monthly). The federal grant administrator designee is responsible for collecting the forms.
- The duties on the time log must be specific regarding the grant activities and responsibilities provided by the split-funded personnel.
- Teacher class schedules may be turned in at least biannually (August and January) instead of time logs if the employee has a fixed daily schedule.

The applicable federal grant administrator(s) will review the split-funded log for allowability and monthly percent/time breakdown. Signed forms are maintained in the office of the grant administrator.

The federal program administrators will work with the Finance Director quarterly to reconcile payroll charged based on the actual percent of time charged to the listed funding sources. A final reconciliation/adjustment is completed at the end of the year if needed to ensure that the final amount charged to the federal award is accurate, allowable, and properly allocated.

Stipends – GA 160-3-3-.04

Stipends will be paid to certified personnel for having successfully completed previously approved learning opportunities that have occurred at any time during the fiscal year outside of the employee's normal contract hours at the rate of \$150/day (8 hours), \$75/half day (4 hours) or prorated at \$18.75/hour. Documentation of completion of professional learning activities will be provided by the appropriate Federal Program Director/Coordinator to Business Services and the supplemental pay will be included in the employee's next monthly check. This same process will be used for both Federal and non-Federal Programs. Rockdale County School System does not pay stipends for work on an award for performance. Documentation will be maintained that stipends paid were allowable, reasonable, and necessary to the Federal Program, including time and effort.

Awarding Stipends:

Stipends will only be awarded if the following conditions exist:

- There is evidence that the knowledge, skills, practices, and dispositions gained from the professional learning activity are aligned to an approved individual plan, or a school or LEA initiative and/or product, and/or specific goals; and
- There is evidence that the knowledge, skills, practices, and dispositions developed through participation in or facilitation of professional learning have been implemented/demonstrated in the classroom/work setting; and
- Participation occurs beyond regular contract hours, days, or school year. The stipend must be supplemental in nature.
- State and federal funds designated for professional learning shall not be used to pay stipends to school board members or to school council members who are not employees of RCPS.
- Be issued in accordance with SBOE Rule 160-3-3-.04 o §200.403(c) – costs must be consistent with policies and procedures that apply uniformly to both federally-financed and other activities of the non-Federal entity.

- §200.404(e) – in determining reasonableness of a given cost, consideration must be given to whether the non-Federal entity significantly deviates from its established practices and policies regarding the incurrence of costs, which may unjustifiably increase the Federal award’s costs.
- State and federal funds designated for professional learning shall not be used to pay stipends to school board members or to school council members who are not employees of RCPS.

The appropriate Federal Program Director/Coordinator will maintain the appropriate paperwork to ensure employees are adequately compensated.

Professional Learning Stipends for Federal Program Funds – GaDOE Rule 160-3-3-.04

Stipends may be paid to teachers and paraprofessionals during non-work hours to analyze data and upgrade an educational program for at-risk students. Activities must be part of the schoolwide plan and support an identified academic need through the school’s comprehensive needs assessment. Stipends may also be paid to teachers and paraprofessionals during non-work hours for professional development aligned with Title I, pursuant to GaDOE Rule 160-3-3-.04

- All Federal Programs will follow the district regulations for stipends.
- The principal/instructor must identify the purpose of the stipend and provide a list of personnel receiving payment. This need must be identified in the Comprehensive Needs Assessment, the School Improvement Plan, and the school’s budget. Pre-approval by the Federal Programs Director/Coordinator for stipends is required.
- Prior to event, principal must provide an agenda that includes beginning and ending times for stipend hours.
- All teachers/paraprofessionals receiving a stipend must submit to the Title I Director an employee casual labor form signed by the employee and the principal.
- Upon receipt of required paperwork, Title I Director will approve the employee casual labor forms and send to the Finance department for payment.
- Summer Stipends – All principals planning to pay summer stipends must notify the Federal Programs Director and the Finance Director so funds may be encumbered for this purpose. Casual labor forms and accompanying paperwork (sign-in sheets, agendas, periodic certification, etc.) for the month of June must be received in the Title I office within 2 weeks of the ending date of the stipend period. Casual Labor forms and accompanying paperwork (sign-in sheets, agendas, periodic certifications, etc.) for July must be received in the Title I office by the third Friday in July. Upon approval of stipend payments by the Federal Programs Director, casual labor forms will be given to the Finance Director for payment. All stipends will be paid from the appropriate grant period.

****Stipends amounts must not exceed the amounts paid to teachers from non-Title funds. Check with HR Director, Curriculum and Instruction Director, and Professional Development Director to verify stipend pay rates. Title I paid stipends amounts must be consistent at all Title I schools.**

Hazard Pay

Employees may receive hazard pay for a national or local emergency or to perform critical services. Instances when this might happen may include a pandemic or a natural disaster. Employees will be

compensated for fully completing an objective from a supervisor related to the aforementioned conditions.

Leave Policy

This policy shall apply to all benefits-eligible employees of the Rockdale County Board of Education. All employees are required to follow the appropriate work calendar established by the Board for their positions and may take leave from work only in accordance with this policy or other leave policies enacted by the Board. Unless otherwise provided by the Board, Principals and other supervisors are not authorized to rearrange the work calendars of employees. Deductions in pay will be made for absences not covered by this policy.

Accrual of Sick Leave and Absences for Medical and Related Reasons

Each benefits-eligible employee of the Board shall be allowed to earn sick leave, with full pay, computed on the basis of one and one-fourth (1¼) working days for each completed month of service. All employees may accumulate unused sick leave from one fiscal year to the next up to a maximum of one hundred and thirty (130) days, although the Teacher Retirement System of Georgia allows participating employees to accumulate an unlimited number of unused sick leave days for credit toward retirement. Sick leave accumulated by a certificated employee or bus driver is transferable from one school system to another, up to a maximum of forty-five (45) days. When employees transfer to the Rockdale County School System from another public school system, any transfer of leave must take place within one year of separation from the previous position. It is the employee's responsibility to request and confirm this transfer from the former system. Accumulated leave earned by a certificated employee must be forfeited if such employee withdraws from service for twelve or more consecutive months, but such forfeited leave may be reinstated in accordance with the provisions of O.C.G.A. § 20-2-850. Accumulated leave earned by a bus driver under O.C.G.A. § 20-2-1110 must be forfeited if the driver withdraws from service for twenty-four (24) or more consecutive months.

Sick leave may be used upon the approval of the Superintendent or designee for absence due to personal illness or injury, exposure to contagious diseases, or for absences necessitated by illness or death in the employee's immediate family.

For any absence in which sick leave is used, the Superintendent or designee may require a physician's certificate stating that the employee is ill and is unable to perform his or her duties. In the event that sick leave is used to care for a member of the immediate family, the Superintendent or designee may require a physician's certificate stating that the employee is needed to care for the sick family member. If an employee is absent for three (3) consecutive days of sick leave, a physician's certificate may be required at the discretion of the Superintendent or designee.

For the purposes of absences for medical and related reasons, members of the immediate family are defined as spouse, children, parents, siblings, in-law equivalents of the same, grandparents, grandchildren or any dependent as shown in the employee's most recent tax return.

Substitutes for Teachers and/or Paraprofessionals

Schools must provide documentation monthly verifying the names of substitute teachers who have filled in for teachers and/or paraprofessionals. The documentation must include the name of the substitute, the name of the teacher/paraprofessional who was absent, the date of the absence, the quantity of leave, and the appropriate org and object number. If the absence was due to participation in a professional learning activity, the documentation must also include the professional learning activity attended. The form must be signed by the school-based representative who completed the documentation.

Job Descriptions

Job descriptions will be developed, maintained, and provided to the GaDOE for approval for all positions

paid with federal funding

Travel Policy – CFR 200.474; 200.475; OCGA §50-5B-5; OCGA §20-2-167(b); SBOE 160-5-2-.23 Financial Management for GA LUAs Chapter 40

All travel costs must follow the Georgia Statewide Travel policy set by the State Accounting Office. Rockdale County may choose to be more restrictive, but not less than the Georgia Statewide Travel Policy.

Travel costs are allowable for employees traveling on official business incidental to the grant program. Only costs directly associated with the permissible travel, the primary purpose of which is the dissemination of technical information specifically related to federal funds, will be reimbursed. No costs for tours or souvenirs offered by the event will be reimbursed. Reimbursement may not exceed local policy. Out of state travel requires pre-approval through the department associated with the specific Federal Program and the appropriate Cabinet administrator.

- All expenses paid must be reasonable and consistent with established State Travel Regulations GSA 48 CFR 31.205-46a.

Costs incurred by contracted personnel on official company business are allowable, subject to the limitations contained in this subsection. Costs for transportation may be based on mileage rates, actual costs incurred, or on a combination thereof, provided the method used results in a reasonable charge. Costs for lodging, meals, and incidental expenses may be based on per diem, actual expenses, or a combination thereof, provided the method used results in a reasonable charge.

Required Documentation:

- Pre-approval from the Federal Programs Director or Director/Coordinator of specific grants
- Agenda
- Certificate of Participation (if available).
- Travel reimbursement form (signed and dated by employee and direct supervisor)
- Required receipts.
- Per Diem Form.

Costs incurred for lodging, meals, and incidental expenses shall be considered to be reasonable and allowable only to the extent that they do not exceed on a daily basis the maximum per diem rates in effect at the time of travel as set forth in the State Travel Policy. If travel costs are charged directly to a federally funded source, documentation must justify that:

- Participation of the individual is necessary to the federal award.
- The costs are reasonable and consistent with non-federal entities' established travel policy or follow GSA 48 CFR 31.205-46a.
- A conference/training is necessary for the project by inclusion of an agenda.

The following procedures are intended to ensure that charges are reasonable and consistent:

- Appropriate administrator of the federal funding source must pre-approve any applicable federally funded travel.
- Building/facility administrator must pre-approve travel requests.
- A travel expense form must be completed in its entirety in order to receive reimbursement for expenses.
- Official receipts are required.
- Employees are responsible for ensuring that expenses claimed in the travel expense report are proper, accurate, and incurred for official business. A traveler who knowingly presents a false or fraudulent claim may be subject to penalties under criminal statutes.
- Employee completes and sends the "Travel Expense Statement" to their administrator for

approval.

- The building/facility administrator verifies the information on the form and, once deemed accurate, sends the form to the appropriate Federal Program Director/Coordinator for approval and processing.
- Purpose for the travel, such as agendas, sign-in sheets, etc., and applicable receipts must be included with the expense report.
- Attendees are responsible for maintaining and providing, upon request, information related to registration and dues and fees to include agenda, sessions attended, and proof of attendance.

Failure to request reimbursement within 30 days of travel may result in a loss of or reduction of funds.

Airfare: Reimbursed at lowest available airfare. Requires pre-approval by the Director/Coordinator associated with the Federal Program and appropriate Cabinet-level administrator.

Car rental: Must be pre-approved and only allowable if rental is more cost effective than other transportation such as taxi or shuttle.

Mileage: Not to exceed current local allowance set forth by the current government reimbursement regulations. Odometer readings are required. Parking fees at conference sites are reimbursable with appropriate receipt.

Lodging: Must be outside the 50-mile range and must be more than a full day workshop. Lodging must be reasonable and necessary. Employees must claim exemption from the local hotel sales tax using the form available on RCPS 411. Receipts must be attached to Expense Statement.

Meals: Employees may be reimbursed for cost of meals according to Regulations, not to exceed the approved per diem amount per day. Meals will not be reimbursed when included in workshop/conference.

Travel Reimbursement

An Expense Statement must be submitted to the Director/Coordinator of the appropriate Federal Program within thirty (30) days of the time the expense incurred. When this time frame is followed, reimbursement checks should be received within five (5) days. Expense statements received after thirty (30) days may be declined for payment.

Travel Reimbursement Form Procedures

When submitting the reimbursement form, the following items are to be completed to avoid delays in the reimbursement process:

- All blocks on the expense report (name, last 4 digits of SSN, school/department, purpose of trip, home/ mailing address, including city and zip) must be completed.
- Employee signature and date.
- Supervisor and/or grant administrator signature.
- Funding code (completed by the grant administrator designee).
- Documentation that must be maintained and attached include (if applicable):
 - Conference agenda
 - Receipts for lodging

- Other expenses receipt
- Per diem form

Travel Reimbursement Submission

Submit the original travel reimbursement form to the appropriate federal program administrator within 30 days of the dates of travel once the form is completed and has obtained all official signatures. After review, the grant administrator will approve the travel reimbursement form and submit to business services for processing.

All documentation of travel authorizations, pre-approval, agendas, and travel reimbursement forms are maintained with the grant administrator for monitoring purposes.

Payment for Requested Reimbursements

Once approved at all levels, staff will receive payment for travel expenses in the form of a check from the Business Department based upon the date of receipt of the complete and submission of the correct travel reimbursement documentation.

Suspension and Debarment - 34 CFR 35.110; 2 CFR 180.220; 2 CFR 200.327 Appendix II Section H; and WHEO 12549 and 12689

Rockdale County Public Schools will not do business with a company in which it, or any of the principals thereof, are currently suspended, debarred, or proposed for debarment by any Federal department or agency. The following methodologies are used, either singularly or in combination, to prevent such contracts from being initiated.

1. All vendors who register as suppliers on the school system's eProcurement site must submit, as part of the process, whether or not they have ever been excluded or debarred from any Federal procurement or non-procurement programs. If the answer is yes, they are not allowed to participate in any solicitation opportunities, or otherwise, do business with the school system. (Fraudulent reporting with regard to debarment status can lead to ineligibility to do business with the school system for an extended period of time or permanent exclusion).
2. A debarment clause is inserted into the terms and conditions of contract which vendors are required to agree to and sign their consent. The current version of the clause is listed below:
 - a. The vendor, by his/her signature, assures the school district that he/she is in compliance with all applicable standards, orders, or requirements issued under Executive Order 12549, Debarment and Suspension. The vendor thus certifies that neither he/she nor any principals of the organization is presently debarred, suspended, proposed for debarment, declared ineligible, or voluntarily excluded from participation in this transaction by any Federal department or agency.
3. If required, the vendor's suspension and debarment status will be checked on the System for Award Management (SAM) website, currently: <https://sam.gov> or such other site as may be determined by the Federal Government.

Each federal program administrator or designee must check the System for Award Management (SAM) website, prior to approving any contract or subcontract expected to equal or exceed \$25,000 to ensure the vendor is not on the list of suspension and debarment. Our district cannot and does not purchase from any vendor or contracted person/company identified on this website as being suspended or debarred. Evidence of the verification will be in the form of a search result screenshot printed, signed, dated, scanned, and attached to the requisition/purchase order.

Internal Controls, Expenditures, Inventory, Drawdowns, Cost Principles – All Programs

Inventory and Equipment Management 2 CFR Sec. 200.62(c); 2 CFR 200.313(d)

Internal controls are in place and implemented to adequately safeguard all assets. Procedures are in place to ensure prior approval of all purchase and provide specification for receiving the equipment and issuing the equipment to the proper locations.

These procedures implement adequate safeguards and maintenance procedures. Such internal controls provide reasonable assurance of the effectiveness and efficiency of the program, reliability of reporting, and compliance with applicable laws and regulations.

The district shall provide effective control over and accountability for all funds, property, and other assets. The monitoring includes purchasing, use, and disposal of property. The district must ensure that equipment is used solely for the authorized purpose.

Inventory of all equipment and property belonging to any Federal Program with a shelf life > 1 year or that can easily be pilfered, will be identified and inventoried on an annual basis. Items identified to be inventoried will be labeled and will be verified by a designee of the building-level or program administrator each year.

The completed and signed inventory is submitted to the Director/Coordinator of each Federal Program. Materials purchased for use in Federal Programs are to be utilized in the capacity for which they were purchased. **Any equipment, materials and/or supplies purchased with Federal funds are considered solely for the use of that program.**

Acquisition of Equipment

All newly acquired equipment must support initiatives in the district and/or a school's SIP. Procurement procedures as outlined in this document must be followed to obtain equipment.

Prior to purchasing the grant administrator must determine if:

- Equipment is reasonable and necessary to effectively operate its programs.
- Existing equipment will not be sufficient.
- Costs are necessary, reasonable, allocable, and allowable.
- Purchases are in accordance with the regulations of the funding source.

All equipment purchases must be signed off by the grant administrator to ensure that purchases are allowable, supplemental, and consistent with academic needs. Technology purchases are determined and approved during the district/school improvement planning process. The requisition for purchase of equipment follows the district's internal control procedures. All technology purchase requests (school and district) must receive prior approval through the Technology Department. For equipment, the technology departments have specific requirements that must be met. The technology departments will not support items that are not pre-approved through their department.

Inventory Management

Federally funded inventory is documented in a spreadsheet that is updated by the respective Federal Program Coordinator for their program each time equipment is purchased. The spreadsheet includes:

- Item Description
- Cost

- Funding Source (Federal Program)
- Federal Award Identification Number (FAIN)
- Date of Purchase
- Vendor Name
- Serial Number/ID Number
- School/facility
- Equipment Location
- Use
- Current Condition of Property
- Disposition Data
- Date of Disposal

Equipment must be entered within 30 days of equipment being received. All equipment purchased by schools must be properly labeled with an identification number and documented on the inventory log prior to allowing use. All equipment purchased is monitored by the appropriate system-level Federal Program Director/Coordinator and school-level administrator or their designee(s). The appropriate Federal Program Director/Coordinator is responsible for inventories purchased from their grants. Schools are responsible to keep their inventory list and provide a copy to the appropriate federal program administrator. The school inventories are kept on file in the office of the appropriate federal program administrator. Facilities are visited by the appropriate Federal Programs Coordinator and inventories are monitored in the fall and in the spring using the inventory lists provided by the school/private school/neglected facility.

Equipment Labels

All equipment must be labeled with an identification tag. The label must include the appropriate federal program name or funds used to purchase the equipment, the fiscal year of purchase, and “Property of Rockdale County Public Schools.” In addition, barcodes are affixed to the items. For items that are exposed to water or that are frequently handled, an engraver may be used.

The appointed school level designee is responsible for labeling equipment and keeping track of inventory. Labels and barcodes must be added after receipt of the item and before the item is distributed for use.

Off-site Use of Equipment

Every precaution must be taken to ensure that equipment used off-site by personnel and students is used for academic purposes and that the equipment is returned at the end of use free of damage and in good working order. Detailed records must be maintained on the equipment, its location, to whom it is checked out, and when it is returned.

Physical Inventories

Each federal grant administrator or designee will conduct a physical inventory at least once every year in accordance with 2 C.F.R. Part 200.313 (d)(2). However, inventory is conducted twice per year (fall and spring) by the Federal Programs Director/Title I Coordinator and the school/facility designees. The timeline for conducting the physical inventories at the schools and district, including the reconciliation of the physical inventory with property records, takes place in October/November and again in April/May. The purpose of physical inventories is to verify:

- The existence of equipment
- Current utilization of equipment
- The continued need of equipment
- The condition of the equipment

Inventory Records

Maintenance of property records and documentation are retained until equipment is disposed of or transferred to another federal program. Records for equipment acquired with federal funds are retained for at least five years after transfer or final disposition. After five years from transfer or final disposition, items will be deleted from the current copy of the inventory log.

Procedures for Use of Equipment

Equipment, materials and/or supplies purchased with Federal funds are considered solely for the use of that program. At the close of the Federal Program or in the event the equipment is no longer needed for the purposes of the project, materials and equipment will be transferred to another Federal Program or disposed.

Transfer to Another Federal Program

1. Complete the Disposal or Transfer of Equipment Form and submit to the appropriate Federal Program Director/Coordinator for approval.
2. The appropriate Federal Program Director/Coordinator will approve or deny the request. Approved requests are sent to the Director of Technology.
3. When approved, the school Principal or Federal Programs Director/Coordinator will transfer the equipment to the appropriate inventory.

Person Responsible

The individual Federal Programs Directors/Coordinators are responsible for maintaining documentation.

Disposal of Unusable Equipment

At the close of the Federal Program, or in the event the equipment is no longer usable, materials and equipment will be disposed of following the RCPS disposition of property which requires approval by the Governing Board. Equipment that is damaged, lost, or stolen will be reported to the individual Director/Coordinator of the Federal Program. Damaged and inoperable equipment will be returned to the Federal Program Director's/Coordinator's office to be removed from the inventory. Lost equipment will be verified by the site director and noted in the inventory. In the event that a Federal Program is no longer available, equipment purchased with Federal funds will be transferred equitably to the inventory of another functioning Federal Program.

Procedures for Disposition of Equipment

Prior to disposal of any equipment purchased with Federal funds, the RCPS Federal Programs Director must first be contacted and provided insight as to the reason for disposition of equipment. The Federal Programs Director will provide guidance based on Federal guidelines.

- Equipment items with an acquisition cost/current per unit fair market value of less than \$5,000 and are more than three (3) years old may be retained, sold or disposed, with no further obligation to the GaDOE. The disposition of such items is to be so noted, including date of disposal, on the Title I Equipment Inventory list maintained by the school/district for three (3) years after disposition date. A Report of Surplus/Lost/Damaged/Stolen form will be completed, a copy sent to the appropriate Federal Programs department, and a copy retained with the inventory log for three (3) years after disposition date.
- Equipment items with an acquisition cost/current per unit fair market value of more than \$5,000 may be retained or sold with the awarding agency (GaDOE) having rights to state's share at \$500 or 10-percent of sales.

- RCPS technology department does not support technology equipment that is out of date. If a school has old technology, the school may continue to use the equipment until it is no longer operational. Once the equipment is no longer operational, it will be recycled or disposed of.
- After approval from the RCPS Federal Programs Director, to dispose of equipment, the technology department must be contacted and made aware of the reason for disposal. A Property Control form will be completed (a copy sent to the RCPS Federal Programs Director) and the equipment is to be taken to the technology department for inspection and disposal approval. The form will indicate the following:
 - Property Lost (Police report provided to Federal Programs Director)
 - Property Sold (Must contact Federal Programs Director)
 - Request for Usable Property (Moving property from one school to another)
 - Removal of Usable Property No Longer Needed (No longer meets specifications for federal program)
 - Transfer of Usable Property to New Location (Remove from Federal Program Inventory but still used within the school)
 - Removal of Unusable Property (No longer usable)

The RCPS technology department works with a company to dispose of and recycle all equipment. Schools are required to follow all guidelines as provided by the Title I Director and technology department.

Loss, Damage, or Theft of Equipment

2 C.F.R. Part 200.313(d)(3) requires that a control system be developed by recipients of federal funds to ensure that there are adequate safeguards to prevent loss, damage, or theft of the property, including real property, equipment, and pilferable items. These procedures should include:

- Adequate safeguards to prevent loss, damage, or theft of the equipment. Some possible control features could include:
 - Locks or security camera (for particularly valuable or vulnerable items)
 - Access controls to warehouses to limit entry to unauthorized personnel
 - Use of logs or sign-in sheets for certain items of property; for example, iPads, laptops, cameras, projectors
- Procedures for promptly entering items received into the inventory management system.
- Process for investigation of any loss, damage and/or theft of equipment. Any loss, damage and/or theft of equipment purchased with Title I funds should be reported to the district level Title I Director.
- Documentation of notification of loss, damage or theft of equipment, and if appropriate, any police reports.

Equipment Use for Title I, Part A Targeted Assisted Programs

The school system does not have any targeted assistance schools. If the district should open a Targeted Assisted school, the following procedures will be implemented to ensure that any equipment purchased is used to benefit only those students who qualify based on multiple educational criteria.

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

Equipment Use for Private Schools and Neglected & Delinquent Institutions

Private schools/Neglected & Delinquent Institutes requesting equipment must facilitate the purchases through the school system. The same internal controls will be followed to create requisitions and inventory and maintain equipment. If equipment is designated for student use, it can be used by eligible students as determined through a mutual agreement between the LEA and private school within Federal Program guidelines. The appropriate Federal Program Director/Coordinator will work cooperatively with private school officials to ensure equipment is properly maintained and is safeguarded from theft, damage, loss, and abuse. An inventory sheet will be created for each Private School and maintained at the district office, and an inventory audit on the equipment will be conducted each year to make sure the equipment is appropriately labeled and being used in the purpose intended.

Maintenance Procedures to Keep Property in Good Condition

Federal Program Directors/Coordinators will ensure that equipment is maintained on an inventory sheet as outlined in this document for as long as it is needed for the purpose of the project/program. Additionally, each Federal Program Director/Coordinator will work cooperatively with the system Maintenance Department and the Technology Department to ensure that equipment is properly maintained to ensure longevity. Accurate records will be maintained about the current condition of equipment purchased with federal funds. When equipment is not functioning, members of the Maintenance Department or Technology Department are responsible for making necessary repairs or service. If no longer working and/or unable to be repaired, the appropriate administrator for the federal funding source will dispose of the equipment based on the disposition policy.

Process for Disseminating Inventory Procedures

The appropriate administrator for the federal funding source is responsible for ensuring that principals and site coordinators are knowledgeable about allowable procedures for the use of Title funded equipment and established procedures for maintaining an accurate inventory of equipment. These procedures will be shared, at a minimum, annually during an administrative meeting. In addition, the Federal Programs Handbook, containing these procedures, will be shared with all personnel.

Cash Management and Drawdowns—2 CFR 200.302(B)(6); 2 CFR 200.305 2 CFR 200.302(B)(6); 2 CFR 200.305

Written processes and procedures governing RCPS' implementation of federal grants are reviewed routinely and revised as needed. If revisions to internal controls are required, RCPS will take prompt action.

- Rockdale County Public Schools uses Munis financial accounting system which provides for separate accounting of non-federal funds (local and state) and federal funds.
- Federal Program budgets are checked by the appropriate Program Director/Coordinator for alignment to the school CNA and SIP. Once budgets have been approved by the Director/Coordinator of their Federal Program, budgets are sent to the Finance Department to upload into Munis. Funds are monitored through the Munis system.
- On a monthly basis, the Director of Business Services meets with the Chief Academic Officer and the Directors/Coordinators for Federal Programs. The Director of Business Services provides a printout of all expenditures by school and system. The expenditures are discussed in detail between the Director/Coordinator, Director of Business Services, and Chief Academic Officer. After review, the Director/Coordinator of their respective Federal Programs signs off on the monthly expenditure review.
- On a monthly basis, the Financial Services Department provides each Director/Coordinator a copy of their Federal Program drawdown expense sheet to inspect and approve prior to the

drawdown. The Director/Coordinator signs off on the drawdown and sends back to the Financial Services Department to approve the drawdown.

- Budget revisions must be approved by the Director/Coordinator of their respective Federal Program. No changes may be authorized without approval of the Director/Coordinator responsible for their Federal Program. In the event that changes are necessary, the Federal Programs Director will have the school's CLIP/SIP released to be updated to match the new need. Documentation in the form of meeting minutes, sign-in sheets that includes participation from a variety of stakeholders, including parents, and the reason for the necessary changes must be submitted to the Federal Programs Director before the amended CLIP/SIP and budget will be approved.
- Period of performance is for the current fiscal year. This begins once budgets are approved and continues through September 30 of the following school year. It is recommended that site licenses purchased with federal funds begin on August 1 of the current school year and expire on July 31 of the same school year. All funds must be obligated for use during the current school year. Funds are obligated when services are performed. Funds to be used for summer activities (professional development stipends, needs analysis stipends, summer tutorials, etc.) must be approved and funds must be encumbered. Casual labor forms requesting payment must be submitted within two (2) weeks of the ending date of the activity. In determining when an obligation is made, RCPS will follow state laws, regulations, and policies and procedures, as applicable.
- RCPS expects to obligate or expend the entire Title I, Part A allocation within each fiscal year (FY). RCPS is authorized to carry over up to 15 percent of Title I, Part A funds to the succeeding FY without applying for a waiver.

The General Education Provisions Act Section 421(b)(1) and the Elementary and Secondary Education Act as reauthorized by the Every Student Succeeds Act (ESSA) Section 1127(a), state that not more than 15 percent of the funds allocated to a LEA for any fiscal year (but not including funds received through any re-allocation), may remain available for obligation and expenditure for one additional FY. All remaining funds not expended or obligated by September 30 of the succeeding FY shall be returned.

Title I, Part A carryover funds are LEA funds to obligate and expend as they determine appropriate which may include centralized services for improving academic achievement pursuant to ESSA Section 1112(b)(13). Such services may include activities and/or expenditures that comply with the general criteria provided on the [Title I, Part A Authorized Use of Funds](#) webpage.

RCPS will use discretion as to how carryover (unspent) funds are re-allocated during the succeeding FY. Unspent Title I, Part A funds from the prior year include: centralized services; funds allocated to the schools; and funds allocated for equitable services. Carryover funds may be re-allocated to eligible schools.

- The post award phase comprises a significant amount of work over the duration of the award dates, which includes implementing the grant, reporting progress, and completing the closeout requirements. To complete a closeout, the RCPS Chief Financial Officer must submit the final financial and programmatic reports. According to the [OMB Uniform Grants Guidance](#) §200.343, RCPS must submit all financial, performance, and other reports required under the grant within ninety (90) days after the grant award expires or is terminated. The awarding agency will review these reports to ensure compliance with all the grant terms and conditions, as well as ensuring that all funds were spent appropriately.

- The Directors/Coordinators of all Federal Programs have received both formal and informal training from GaDOE and the Finance Director. The Directors/Coordinators of all Federal Programs are familiar with the Federal guidelines and have been trained to identify the unallowable activities from the allowable activities. Also, the Directors/Coordinators of all Federal Programs review program expenditures to ensure that the expenditures are in compliance with the Federal Programs Objectives and EDGAR. GaDOE directives are followed to ensure that accounts are properly maintained in line with any changes in the state chart of accounts.

The Directors/Coordinators of all Federal Programs are familiar with federal/state guidelines and have access to all relevant codifications concerning allowable costs and are kept aware of any changes through federal or GaDOE updates and workshops. Procedures are in place to ensure that direct charges against Federal Programs are not also charged against other federal funds. However, in some cases, it may be necessary to use funds from multiple grant sources. When this is necessary, it is indicated on the purchase requisition.

All purchasing for Federal Programs will follow the rules and guidelines of the Rockdale County Public Schools and meet Georgia Auditing Guidelines.

Segregation of Duties for the Drawdown

The general ledger is reviewed monthly by each federal program grant administrator for any discrepancies or unallowable charges. If discrepancies are noted, appropriate documentation is provided to the Director of Business Services for research and to make corrections as necessary. On a monthly basis, the following steps are followed to submit a drawdown:

1. Run an expenditure report (Flexible Period Report) for the year-to-date expenditures through the month that funds will be drawn down using parameters of the appropriate fund.
2. Verify that the revenue on the operations reports agrees to the amount listed as “Grant Funds Received and/or Requested through Previous Period” on line “a” of the DE0147. Enter this amount on line b (prior amount of YTD expenses previously requested).
3. If expenditures are greater than revenue, enter the expenditure amount from the operations report in the estimated requirements field of the DE0147.
4. Drawdowns are only allowed after costs have been incurred. This is verified for accuracy by each grant administrator during the first week of each month.
5. The total amount requested is then automatically populated based on the amounts entered.
6. The drawdown request is prepared and submitted by the Accounting Manager, reviewed by the Federal Programs Director and approved by the Director of Business Services.
7. Upon receipt of grant payment advice, the Director of Business Services compares it to the daily bank deposits to verify that we received the amount requested. If there are not any issues, the Director of Business Services records the revenue on the general ledger.

Monitoring Cash Management/Reconciliation Procedure

Every month, each grant administrator reviews expenditures for correctness. This process is as follows:

- The Grants Manager pulls a general ledger report and budget analysis report for the ended month and sends to the appropriate grant administrator.

- The grant administrator reviews the report expenditures for accuracy and alignment with the approved federal grant budget (reconciliation). The grant administrator notates any discrepancies and provides documentation to the Grant Manager.
- The grant administrator meets with the Grants Manager to discuss discrepancies.
- The grant administrator signs and dates the reports.
- The grant administrator keeps a copy of the signed and dated reports on file for monitoring purposes.
- The grant administrator sends the original signed and dated report back to the Grants Manager within several days of receipt to keep on file for monitoring purposes. (Grants Manager will send reminders if not received in a timely manner.)
- The Director of Business Services or designee will make any corrections prior to completing the drawdown.

Ensuring Reimbursements are After-The-Fact

- The Grants Manager provides each federal program manager with an expenditure report from the previous month. The federal program manager approves the expenditure report and returns to the Grants Manager.
- The Grants Manager prepares the requisition of funds.
- Funds are requested on the reimbursement basis (after costs have been incurred).
- The claim is processed through GAORS (GDOE application) or other specified applications.
- The funds are recorded on the financial records through a journal entry.
- Documentation of the receivable is maintained in a folder and is tied to the financial statements by the Director of Business Services.
- The Grants Manager signs off on all requisition of funds.
- The Director of Business services reviews the Trial Balance Report.
- These reports are provided to the Rockdale County Board on a monthly basis for review and approval.

Methods and Procedures for Payment

Rockdale County Public Schools (RCPS) must minimize the time elapsing between the transfer of funds from the GaDOE and the disbursement by the district. RCPS will drawdown federal funds on a reimbursement basis for all allowable expenditures incurred in their respective participating Federal Programs.

Methods for Evaluating and Drawdown Requests

RCPS follows drawdown procedures to ensure that:

- Reimbursements are only made after costs have been incurred.
- Drawdown requests are only for immediate need.
- The grant administrator ensures reconciliation of the budget to expenditures.
- The grant administrator authorizes the drawdown request, and
- Funds are not drawn down before actual need.

Methods to Reconcile Drawdown Requests

- The Director/Coordinator of each Federal Program receives budget summary reports monthly (usually around the 5th of the next month) from the Grants Manager. The reports are reviewed and any discrepancies are addressed with and corrected by the Finance Director and Grants Manager. After review and revisions (if necessary), the reports are signed, dated, and returned to the Grants Manager to keep on file. Copies are also kept on file with the Federal Program Director's/Coordinator's office

Completing and Reconciling Completion Reports

Completion reports are due 30 days after the end of the grant period.

- **Timeline:** Completion reports for all Federal Programs are completed and submitted to the GaDOE through the MyGaDOE Web Portal by the October due date after the end of the grant period.
- **Person(s) responsible:** The Flexible Period Report for the fiscal period that is being finalized is run by the Accounting Manager and sent to the Director/Coordinator of their respective Federal Program(s) for review and approval of expenses. Once the Director/Coordinator signs, dates, and returns the approved report to the Business Office, the Accounting Manager will use the approved reports to enter the data in the completion report. The completion reports are given to the Director of Business Services for review. After the completion report is reviewed, approved, signed and dated by the Director of Business Services, the Accounting Manager submits the final report through the GaDOE web portal.
- **Supporting Documentation:** The signed and dated supporting documentation is kept on file in the Business Office for a minimum of 3 years.

Maintenance of Supporting Documentation

The Chief Financial Officer or designee maintains the following documentation:

- Supporting operations reports.
- General ledgers and budget analysis reports reviewed by the grant administrator indicating any corrections needed.

The Grants Accounting Manager is designated to ensure that signatures and dates of reconciliation are included in the documentation.

Method for Evaluating Sub-Recipient Requests

RCPS doesn't use sub-recipients with Title I funds.

RCPS has several private schools who may be considered as sub-recipients. Private schools work closely with the administrators of the Federal Programs for which they participate. After meaningful consultation with the appropriate private school officials, RCPS plans, designs, and implements Title I equitable services for identified private school children who reside within our district boundaries.

The administrator of the funding federal program must annually evaluate the equitable services that were provided to the private school students to determine the progress being made in meeting participating students' academic needs. Federal program administrators will consult with appropriate private school officials to determine:

- How the services will be academically assessed.
- How the results will be used to improve services.
- What modifications are necessary if annual progress is not made.
- If the services will be continued.

Tutorial services may be considered as sub-recipients of Title funds for private schools.

- Tutors are selected by the private school officials. In some cases, tutors may be private school teachers who are working after contract hours to provide tutorial services to the students.
- Tutors are required to provide a W-9 and complete the Rockdale County Non-Employee Casual Labor Form.
- Payment for private school tutors is the same as RCPS tutors;
 - \$40/hour for certified teachers
 - \$25/hour for certified paraprofessionals working under the direct supervision of a certified teacher.

- Hours worked and duties performed are documented on the Casual Labor Form.
- The tutor must sign and date the form.
- The private school official must sign and date the form to verify correctness.
- The form, with official signatures, is sent to the administrator of the funding federal program.
- After approval, the federal program administrator signs and dates the casual labor form and sends it to business services for processing.
- Monitoring of the tutor is ongoing and discussed during monthly meetings with the private school administrator.
- Termination of the tutor would be based on subpar or inadequate performance.

Vendor Payments

The Purchasing Director is responsible for processing all payments to vendors. The Accounts Payable Department is responsible for posting the payments to the general ledger, printing vendor checks, and reviewing documentation for each check to ensure that the appropriate amount was paid. After review by the Accounts Payable Department, the checks and supporting documentation are given to the Financial Director for review. The Financial Director reviews the documentation and signs the check register to indicate that each check has appropriate documentation. The checks are then mailed by the Accounts Payable Clerk.

Payroll

Payroll is processed monthly by the Payroll Clerk. Payroll is posted by the Lead Payroll Specialist. Paychecks are printed by the Lead Payroll Specialist. The wire transfer for direct deposit is made by the Accounting Coordinator. The payroll register is reviewed and signed by the Financial Director as well as the board members.

Indicator 6: Title I, Part A – Within District Allocation Procedures

Allocation of Funds to Attendance Areas - ESEA: Sec. 1113; 34 CFR 200.70 and 200.71

Rockdale County Public Schools (RCPS) will use funds received under Title I, Part A only in eligible school attendance areas. The term “school attendance area” means the geographical area in which the children who are normally served by that school reside. For Georgia, this includes any public, locally approved charter, or virtual school within the LEA’s attendance area. The term “eligible school attendance area” means a school attendance area in which the percentage of children from low-income families is at least as high as the percentage of children from low-income families served by RCPS as a whole.

Under 34 C.F.R. 200.78(c), RCPS is not required to allocate the same per-pupil amount to each participating school. RCPS allocates different per-pupil amounts to participating schools with higher poverty rates than it allocates to schools with lower poverty rates. The Title IA Eligible Attendance Area worksheet, located on the Title IA Website and embedded in the GaDOE (ConApp) portal is completed to determine poverty percent per eligible Title I school.

The following process is conducted by the Director of Federal Programs to determine schools that are eligible for Title I services:

1. Request Free and Reduced (F&R) data from the Nutrition Director that is pulled from the GaDOE portal. The data used must be the previous year’s 1st October Free and Reduced Lunch Count and the previous year’s 1st October FTE. The FTE count is for enrollment. The Free and Reduced

Lunch Count is used for determining the number of free and reduced meals. This process should take place starting in April.

2. If the district is opening new schools or schools are being redistricted/rezoned, follow these procedures:
 - Request the names of the students being moved from one school to another in this redistricting/rezoning process in order to obtain a count.
 - Request the free and reduced information for students affected by moving to a different school due to a new school opening or redistricting/rezoning. This information is obtained from the Nutrition Department.
 - For each school, list the schools receiving students and indicate the number free and reduced lunch students.
 - Place all information for all schools in the district on the [Eligible Attendance Area Worksheet Worksheet](#) located at this link or on the GaDOE Title I Resources page.
 - Additional guidance is found in the [Title I, Part A Handbook](#).
3. Under Sections 1113(a)(2)(B) and 1113(b)(1)(A) of ESEA, a school is eligible for Title IA funds if its poverty percentage is as high as the LEA's poverty percentage or, at the LEA's discretion, at least 35%. For example, if an LEA's poverty percentage is 30%, any school in the LEA that has a poverty percentage of at least 30% is eligible. In contrast, for an LEA with a poverty percentage of 35% or greater, the schools that are eligible for Title, Part A are those with a poverty percentage that equal or exceed the LEA's poverty percentage unless the LEA chooses to make eligible all schools with a poverty percentage of 35% or more. Rockdale County Public Schools are all above 40% poverty.

Meeting the eligibility criteria does not guarantee that a school will receive Title IA funds. Receipt of funds depends on the amount of an LEA's allocation and school poverty rankings, the per-pupil amount the LEA allocates to each school (e.g., an LEA may allocate more per pupil amount to schools with higher poverty percentages), and, in some cases, the grades that a school serves (e.g., an LEA may allocate more per pupil amount to elementary schools than high schools). After an LEA has ranked all of its schools by percentage of poverty, Section 1113(a)(3)(A) of ESEA requires the LEA to first allocate, in rank order of poverty, Title IA funds to the schools above 75% poverty, including all elementary, middle and high schools.
4. Based on poverty percents, Rockdale County serves all schools as schoolwide Title I schools based on the following:
 - After completion of the Eligible Attendance Area Worksheet, all schools are ranked from highest poverty to lowest.
 - Schools over 75% poverty are served in rank order from highest to lowest (this includes elementary, middle, and high schools).
 - All elementary schools below 75% poverty are ranged by poverty percent from highest to lowest and served in the k-5 grade span.
 - All middle schools below 75% poverty are ranked by poverty percent from highest to lowest and served in the 6-8 grade span.

- All high schools below 75% poverty are ranked by poverty percent from highest to lowest and served in the 9-12 grade span.

Per pupil expenditures are calculated based on poverty percent with the higher poverty schools receiving more or at least the same amount per pupil as lower poverty schools. At no time will a lower poverty school receive more per pupil funding than a higher poverty school.

After calculating per pupil amounts for each school and entering on the school allocations tab of the Title I, Part A Improving the Academic Achievement section in the Con App, a printed copy is provided to the Chief Academic Officer for approval. Once approved, a copy of the report is provided to the Chief Financial Officer to present to the Rockdale County Board and Superintendent for approval.

Reservation of Funds – ESEA: Sec 1113; 34 CFR 200.70 and 200.71

Set-Aside Budget Process

After receiving notification of the Title I, Part A grant amounts from GADOE, reservations in each budget, based on their required components, are set aside for required/allowable components such as parent involvement, professional learning, neglected and delinquent, private school per pupil and equitable services, and homeless students. Administrative costs are also part of the reservations, which are not part of the schools' per pupil amounts. The remainder of Title I funds are allocated to schools based on per pupil allocation, as determined by the percentage of students qualifying for free and reduced lunch price meals. Rockdale County Public Schools complies with the requirements to:

- Reserve funds for the various set-asides either required or allowed under the statute.
- Allocate funds to eligible school attendance areas or schools in rank order of poverty based on the number of children from low-income families who reside in an eligible attendance area.
- Categorizes carryover funds to distinguish Parent Involvement, Private Schools, Targeted/Comprehensive Support, or Professional Development for Targeted/Comprehensive Support schools, if all of the required funds were not expended.

The district uses the information provided by GaDOE to determine reservations for Parental Involvement, Indirect Costs, and Neglected and Delinquent, Equitable Services, and other required and optional set-asides. All expenditures must be approved by the Director of Federal Programs.

Required Set-Asides

Homeless Set-Aside

Homeless reservations may be based on one of four formulas. The Director of Federal Programs meets with the Director of Student Support and the Homeless Liaison to determine the needs and which of the four methods will be used. Currently, RCPS, in collaboration with the Director of Student Support and the Homeless Liaison have determined to use Method #1 for the Homeless set-aside. If it is decided that more funds are needed, an adjustment will be made.

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

The district looks at the needs from the previous year of homeless students to meet this requirement. This information is noted on the coordination page for the consolidated application. Prior to determining the method annually, the Federal Programs Director, the Director of Student Support, and the Homeless

Liaison meet to determine the appropriate amount needed to support the needs of homeless students. In determining appropriate expenditures for the set-aside for homeless students, it is important to note that comparable services may not necessarily mean services that are identical to the services provided to non-homeless students (i.e. uniforms, expedited evaluations, eye glasses, transportation). The district has the discretion to use set-aside funds to provide homeless students with services that are not ordinarily provided to other Title I students and that are not available from other sources. Additionally, the Homeless Liaison will inform the Director of Federal Programs if additional funds are needed during the year to support the needs of homeless students.

Neglected and Delinquent Set-Aside

Rockdale County Public Schools serves students at our neglected facility, Elks Aidmore Children's Center. The Director of Federal Programs provides the Annual Neglected and Delinquent Survey to the Director at Elk's Aidmore. The survey is conducted, verified, and submitted to GaDOE by the Director of Federal Programs through the consolidated application. The Director of Federal Programs and the Title I Coordinator work closely with the Director at Elks Aidmore Children's Center to ensure that appropriate services are being provided for students based on needs. Funds are provided based on the survey results received during the previous school year. The needs are assessed and, through consultation with the Centers officials, services are set up to assist the students as needed.

Parent and Family Engagement Set-Aside

The district receives more than \$500,000 for Title I, Part A funding. Therefore, 1% of this amount will be reserved for Parental Involvement. At least 90% of the 1% will be reserved for the schools unless a District-wide Parent Activity-Project Assurance form is signed. RCPS provides 100% of the 1% set-aside to the schools based on highest need. The needs of the highest poverty schools are considered first. All schools receive some portion of the 1% set-aside to ensure that required parent and family engagement trainings and meetings take place. If the district is eligible for carryover funds, the parent engagement 1% set-aside will be recalculated accordingly.

Parent Involvement Carryover Set-Aside

RCPS must account for Parental Involvement set-aside funds in carryover amounts and ensure that any funds not used in the fiscal year in which the funds are allocated be added to the required percent set-aside in the next fiscal year. The following process will be used to calculate carryover amounts:

- Obtain the previous year's Parent Involvement Expenditure Reports.
- Compare the amount spent to the required set-aside amount.
- If the amount spent is at or greater than the required set-aside amount, then there is no need to carry over funds.
- If the amount spent is less than the required set-aside amount, the difference must be carried over to the next school year as an additional required set-aside.

Private Schools Equitable Services Set-Aside

Rockdale County does provide equitable services to private schools. The GaDOE Private School Proportionate Share Worksheet is attached to the Consolidated Application to ensure that all reservations related to parental and family engagement, and equitable services for teachers and students have been reserved.

Private School Carryover Funds Set-Aside

RCPS must account for Private School set-aside funds in carryover amounts and ensure that any funds not used in the fiscal year in which the funds are allocated are added to the required equitable services set-aside in the next fiscal year. The following process will be used to calculate carryover amounts:

- Obtain the previous year's Private School Expenditure Reports.
- Compare the amount spent to the required equitable services set-aside amount.

- If the amount spent is at the required set-aside amount, then there is no need to carry over funds.
- If the amount spent is less than the required set-aside amount, the difference must be carried over to the next school year as an additional required set-aside.

Unused private school funds from the previous fiscal year will be provided as carryover funds. The private schools proportionate share will be calculated by the GaDOE Ombudsman’s team and provided to districts on the GaDOE Private School Proportionate Share Worksheet. A meeting will be held with each participating private school to determine the use for the carryover amount based on the private school’s needs assessment. The private school’s needs assessment will be reviewed with the private school officials to determine if changes need to be made at this time.

Optional Set-Asides:

Indirect Costs

The GaDOE calculates restricted indirect-cost rates for LEAs each fiscal year (July 1 to June 30) based on requirements established by ED. Restricted indirect-cost rates are posted on GaDOE’s website and are sent to LEAs.

RCPS will determine the amount to set aside using the Data Collections Tab in the Program Information Tab of the Title I, Part A Consolidate Application. The Indirect Cost rate can be requested from the Chief Financial Officer. Enter that amount in the Data Collections tab to determine Indirect Costs allowable for the Title I Set-Aside.

Audit Costs

RCPS sets aside funds to cover the cost of the single audit for the Title IA Program.

Private School Administrative Costs

RCPS sets aside the administrative costs for providing private school equitable services. This cost is calculated at 10% of the allocation provided for each private school.

Professional Development Set-Aside

RCPS sets aside costs for district initiatives, literacy coaches, and district professional development and training.

Additional Parent Involvement costs

RCPS sets aside more than the required 1% for parent and family engagement. These funds are used for the salary and benefits for a district Parent and Family Engagement Director.

School Allocations

Each school’s allocation is calculated by using the number of students in poverty and establishing an appropriate Per Pupil Amount. After determining allocations for each of the Title I schools, the Director of Federal Programs sends each Title I principal a Budget Allocation worksheet which shows the school’s allocated amount. Principals submit a proposed budget listing all items being requested for purchase. These items must be listed and described in the schools’ CLIP/SIP and must address the identified academic needs of the respective school. The proposed budgets are reviewed by the Director of Federal Programs, Title I Coordinator, or the respective federal grant administrator to ensure all requests meet compliance requirements of their grant. Once approved by the grant administrator and the Assistant Superintendent of school accountability for the respective school, the budgets are submitted to GaDOE through the Consolidated Application. After GaDOE’s approval, the budget will be entered into the RCPS Accounting/Purchasing System (Munis) by the Grants Manager. Allowable purchases by schools/district may only be items that have been approved by GaDOE as submitted in the Consolidated Application.

Amendments

Principals are given the opportunity to request changes to their school's Title I budget. If carryover funds have been received from the previous year, these funds are budgeted at this time. After gathering input from staff and stakeholders, if it is determined that struggling students would be better served by utilizing Title I funds in another way than was previously budgeted, a revised Title I Budget Sheet will be submitted for review. The school's Title I Plan must also be revised to indicate changes made in the budget and include data indicating the need for revision. The Director of Federal Programs, Title I Coordinator, and/or administrator of the respective federal program will work with schools to ensure compliance and allowability and provide assistance with budget revisions (amendments). An amendment will be submitted to GaDOE through the Consolidated Application. When amendment approval is granted, revised Title I Budget worksheets will be provided to the Grants Manager who will make revisions in the RCPS Accounting/Purchasing System (Munis).

Collecting Poverty for Equitable Services

Within 30 days of the beginning of the school year, it is the duty of the private school administrator to provide to the school superintendent of each public school district in which it has residents enrolled in the private school a list of the name, age, and residence of each resident enrolled. The DE1111 form lists students address. The Director of Federal Programs verifies that the addresses are within the boundaries of Rockdale County Public Schools. If the addresses are not within the RCPS boundaries, the private school administrator is contacted so the student can be removed from the RCPS DE1111 form and applied to the form for their appropriate county. Once verified, the DE1111 data is entered in the GaDOE portal by the Federal Programs administrative assistant. The DE1111 forms are also used to help determine eligibility for equitable services.

During the initial consultation with private schools wishing to participate in equitable services, the Director of Federal Programs provides each participating private school administrator with the Free/Reduced Lunch Application Form for their Rockdale County resident children enrolled in their private school. The private school administrator provides a copy to each family. Private schools are requested to return the forms by the end of November of the consultation year. If not received, the Director of Federal Programs or designee will contact the private school administrator requesting that the forms be returned. Once the forms are returned, poverty determinations are made for all students listed on the DE1111 form. If all Free/Reduced Lunch Application Forms are not returned, poverty determinations will be made based on extrapolation. The number of eligible students is provided to the GaDOE through ES4PS. The GaDOE uses these numbers to determine the private school equitable services allocations for each participating private school.

Rank Order

All RCPS schools are Title I served and Targeted Assistance is not applicable at this time. In the event targeted assistance programs are implemented, appropriate procedures will be followed.

The Director of Federal Programs and the Title I Coordinator will work collectively to oversee the process conducted by each school to determine the rank order of students who are eligible for Title I, targeted assistance services.

In an effort to provide consistency across the district and to maximize the number of students appropriately placed in Title I Math and/or Reading classes, certain selection criteria has been established.

Use the following:

1. By grade level, use most current Georgia Milestones Assessment data, Iowa/CogAT (if applicable), STAR data, and district assessments to make initial determination for Title I class placements.

- a. math scores if serving students in math.
 - b. reading/ELA scores if serving students for reading/ELA.
2. Create different subject area lists of students. For example:
- a. ELA scores (least to greatest)
 - b. Math Scores (least to greatest)
 - c. Create separate list for each grade level: ex. All 3rd grade on one list, all 4th grade on one list, etc. All students in the grade level must be on the rank order roster spreadsheet.

Recommendation: Use reports from Infinite Campus to ensure that all students are included on the spreadsheet.

Reading/ELA: Use multiple education criteria, (Georgia Milestones, IOWA, or STAR Assessment Data). Filter the data and use the below indicators:

EOG, EOC, STAR ELA, or District CFAs for ELA

- a. Performance Level 1 - Beginning Learner – apply 4 points
- b. Performance Level 2 - Developing Learner – apply 3 points
- c. Performance Level 3 - Proficient Learner – apply 2 points
- d. Performance Level 4 - Distinguished Learner – apply 1 point

EOG, EOC or STAR Reading

- a. Performance Level 1 – Did not Pass – apply 4 points
- b. Performance Level 2 – Pass – apply 2 points

IOWA:

- a. Combined Reading (reading 1 + Reading 2 + Vocabulary) score of 0-69 – apply 4 points
- b. Combined Reading (reading 1 + Reading 2 + Vocabulary) score of 70-79 – apply 3 points
- c. Combined Reading (reading 1 + Reading 2 + Vocabulary) score of 80-89 – apply 2 points
- d. Combined Reading (reading 1 + Reading 2 + Vocabulary) score of 90-100 – apply 1 point

CogAT:

- a. Verbal score of 0-69 – apply 4 points
- b. Verbal score of 70-79 – apply 3 points
- c. Verbal score of 80-89 – apply 2 points
- d. Verbal score of 90-100 – apply 1 point

Math: Use multiple education criteria, (Georgia Milestones, IOWA, or STAR Assessment Data). Filter the data and use the below indicators:

EOG, EOC, STAR, or District CFAs for Math

- a. Performance Level 1 - Beginning Learner – apply 4 points
- b. Performance Level 2 - Developing Learner – apply 3 points
- c. Performance Level 3 - Proficient Learner – apply 2 points
- d. Performance Level 4 - Distinguished Learner – apply 1 point


IOWA:

- a. Combined math score of 0-69 – apply 4 points
- b. Combined math score of 70-79 – apply 3 points
- c. Combined math score of 80-89 – apply 2 points
- d. Combined math score of 90-100 – apply 1 point

CogAT:

- e. Quantitative score of 0-69 – apply 4 points
 - f. Quantitative score of 70-79 – apply 3 points
 - g. Quantitative score of 80-89 – apply 2 points
 - h. Quantitative score of 90-100 – apply 1 point
3. Compile total combined points for all educational criteria used. Sort students from highest score to lowest score. Identify all students with disabilities. If students with disabilities are already receiving services in reading/ELA, the appropriateness of additional Title I services should be considered.

GaDOE provided Sample Worksheet:

 **Title I Multiple Selection Process Sample Worksheet, Grades 3-12**

Program Type: _____

Subject Area Served: _____

School: _____ Grade/s: _____

Completed by: _____

Date: _____

Selection Process Criteria Options

Check the Multiple Selection Criterion Used: (Check all that apply.)

Check if Used	Criteria	Check if Used	Criteria	Check if Used	Criteria	Check if Used	Criteria
	EOG (ELA):		ELA Grade (prior year)		Universal Screener (EL)		Other (describe):
	EOG (Math):		Math Grade (prior year)		Universal Screener (M)		Other (describe):
	EOC (ELA):		Benchmark (ELA)		Leslie:		Other (describe):
	EOC (Math):		Benchmark (Math)		Other (describe):		Other (describe):

Date	Student's Name	Criteria #1		Criteria #2		Alternate Criteria		TOTAL POINTS	In Program Yes or No	If No, Reason Not Receiving Services
		Data	Points	Data	Points	Data	Points			
								0		
								0		
								0		
								0		
								0		
								0		
								0		

4. From the list(s), create the Title I classes. Each class should have no fewer than 18 students. Ideally, the first class would consist of the first 18 students on the list, beginning with the 1st priority and moving to the 2nd and 3rd priority as needed.

Semester Interval Criteria for selecting students: Using the data sources documented in the original selection process, place students in the 2nd semester Title I Supplemental Class as indicated by rank order.

Once rank order of eligible Title I students has been established, the master roster is sent to the Federal Programs Department. The Director of Federal Programs and the Title I Coordinator will review and approve the list of students. The Director of Federal Programs and the Title I Coordinator will meet with the Targeted schools’ administrative team to provide technical assistance as needed.

Indicator 7: Professional Qualifications

Right to Know – Best Practice

In Georgia, in accordance with ESSA, all LEA schools/programs are required to notify parents at the beginning of each school year of their ‘Right to Know’ the professional qualifications of their student’s classroom teachers and paraprofessionals. Principal’s are provided the GaDOE sample Rights to Know notification template by the Title I, Part A Coordinator. The Title I Coordinator provides the most current, up-to-date letter provided by the GaDOE. Each principal is responsible for updating the highlighted components of the GaDOE sample Rights to Know notification template, which contains the required components and language of the law, to disseminate in their respective school families. The prepared

letter contains the letter of the law and the date or month/year of dissemination. To the extent practicable, the letter is translated in a language that the parent may understand.

The distribution of the notification occurs within 30 calendar days from the start of school or upon enrollment. This notification is sent home with students in the Title I Parent and Student Informational packets at the beginning of the year. The Parent's Rights to Know notification is also posted on each of the school's webpage.

School principals are responsible for providing a copy of the Parent's Rights to Know letter sent to parents to the Title I, Part A Coordinator as evidence of parent notification of their Rights to Know by the end of September. In addition, the Title I, Part A Coordinator requires each school to provide a sample of signed attestations forms received from parents.

- Title I Coordinator will download the Right to Know Notification letter from the GaDOE website to ensure it contains the required information.
- Title I Coordinator sends the downloaded letter to each principal with guidelines as to completing the blank sections, printing out the letter, and sending home with each individual student, including a deadline to when it must be sent.
- Month and year of dissemination are to be filled in by the school principal or designee prior to printing. These letters are printed on school letterhead and included as an individual page in the student packets that are sent home during the first day of school.
- Notifications are placed on the Rockdale County website as well as on each school's website.
- Remind notifications are pushed out to all parents through Remind101.
- To the extent practicable, the notifications are transcribed into the language that parents will understand.

20-Day Notifications

In Georgia, all LEA schools are required to provide timely notice within to parents when students have been assigned or taught for four or more consecutive weeks by a teacher who does not meet applicable state or licensure requirements (including professional qualifications developed by the LEA in alignment with an approved charter or strategic waiver application) at the grade level and subject area in which the teacher has been assigned. The letter must be sent within 10 days following the four consecutive weeks.

Principals will adhere to parent notification requirements for non- PQ staff. Prior to the distribution of the 20-day notifications, the Title I Coordinator will meet with principals to explain the Professional Qualification process and expectations. During this meeting the GaDOE sample non-PQ letter is shared with principals to use for those teachers that do not meet the district PQ requirements.

Principals are required to send parents a letter informing them of the teachers non-PQ status and what qualifications he/she has to teach the assigned class. The Title I Coordinator provides principals with a copy of the GaDOE sample to update the highlighted components based upon the non-PQ teacher. The sample provided by GaDOE contains the required information:

- Day, month, and year of the notification.
- Name of the teacher who has not met professional qualification requirements.
- Name of the district, school or program, and the point of contact, including the point of contact's position.
- Statement that the teacher has not met state certification or RCPS Charter or Strategic Waiver professional qualification requirements for the grade level(s) and/or subject area(s) to which the teacher has been assigned.
- Grade level and/or subject area.

To the extent practicable, the letter is translated in a language that the parent may understand.

Letters are sent to parents through student packets. Parents are also sent a Remind101 message to announce that letters have been sent. Parents who do not return signed copies are notified again and another letter is sent home requesting they sign and return to the school. Copies of the original parent letter and signed copies of the returned parent letter are provided to the Title I Coordinator serving as documentation that the principal has disseminated the notification.