

Bremen City Schools

Federal Programs Processes and Procedures Manual

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David Hicks, Superintendent
Bill Garrett, Director of Special Programs

Bremen City Schools does not discriminate on the basis of race, color, national origin, sex, disability, or age in its programs and activities and provides equal access to the Boy Scouts and other designated youth groups.

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Purpose of this Handbook

The purpose of this standard operations procedures handbook is to provide systematic approach to managing the rules and guidelines of federal programs to ensure consistent compliance in Bremen City School District. The information provided may be used by staff to ensure that federal programs are being implemented accurately and effectively.

The step-by step approach contained in this handbook will promote uniformity in operations as Federal Program staff seeks to carry out official duties and responsibilities. The Georgia Department of Education (GaDOE) provides local educational agencies (LEAs) extensive guidance on the over-arching requirements for federal programs via the on-site monitoring document used to ensure that LEAs are meeting all statutory requirements of federal programs. These specific requirements from the GaDOE document were used to create this handbook. Procedures, local and state Board policies, and checklists are all included in this guide.

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Purpose of Title I

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

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

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

Title I Monitoring Process

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

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

- (a) LEA/Program Director will conduct self-monitoring of its schools and programs sufficient to ensure compliance with Title Program requirements, including Title I, Part A, Title I, Part C, Title I, Part D, Title II, Part A, Title III, and Title VI, Part B.
- (b) Title I Director will undergo training from GaDOE and other sources to maintain proficiency in Title I program compliance requirements.
- (c) Title I Director will provide technical assistance to local school(s).
- (d) Title I Director self-monitoring will include monitoring all program expenditures to verify that all program expenditures comply with Title I Program requirements.
- (e) Title I Director will maintain all documentation LEA may need for future auditing/monitoring according to the LEA Monitoring Form, which is issued annually by GaDOE.
- (f) In years when LEA does not receive an on-site visit, Title I Director will complete the Self-Assessment Checklist and submit it to the Georgia Department of Education (GaDOE).
- (g) LEA will undergo monitoring by GaDOE on a four-year cycle. LEA/Program Director will participate in training and technical assistance updates as provided by GaDOE prior to monitoring visit.

- (h) After the on-site monitoring visit, the LEA will receive a comprehensive monitoring report, which will contain recommendations, findings, and required actions that together provide an analysis of the implementation of the LEA's Title programs. If a Corrective Action Plan is required, the LEA/Program Director will respond in a timely manner with a Corrective Action Plan, which must be approved by GaDOE. The appropriate Title Program Education Program Specialist will monitor implementation of the Corrective Action Plan.

Monitoring is an essential component of ensuring that all facets of the Title I program are being implemented as prescribed by No Child Left Behind under the Elementary and Secondary Act. It is a process of systematically providing technical assistance and collecting data in order to provide information that can guide program implementation. Bremen City Schools Title I Program makes use of monitoring as a means of regular observation and recording of activities taking place in Title I schools. Critical to this process is the feedback provided to schools that can assist in improving student academic achievement. District monitoring addresses the following:

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

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

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

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

- Selection of LEAs to be monitored.
- LEAs are monitored on a four-year cycle. Approximately one-fourth of the LEAs are monitored each year.
- LEAs were initially randomly selected from each of Georgia's 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 FY016 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 evidences serious or chronic compliance problems.

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

LEA Communication With and Monitoring of Title I Schools and Programs

Monitoring of Title I schools is a critical component of ensuring that compliance is taking place at each school. During the summer prior to the beginning of the new school year and after the Annual Title I Conference in June, the district Title I Director convenes a meeting of the Title I principal during a summer orientation. Principals receive training on policies and procedures and guidance for operating a Title I program. Principals are given detailed information on expectations and copies of program guidance. Specific training is provided in all facets of Title I. A principal's notebook is provided for each principal and discussed in detail by the Title I Director. This notebook includes information related to timelines, budget forms, inventory information, schoolwide implementation, Flexible Learning Plans (FLPs) if needed, parental involvement, fraud policy and other areas of Title I as appropriate. Monthly meetings are also held with Title I principals. Specific budget information is given out at these meetings. Phone calls and emails are a regular occurrence between Title I district staff and Title I school staff.

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

Onsite Monitoring Procedures

All Title I schools are subjected to on-going monitoring by the Title I Director throughout the school year. The Title I Director will conduct on-site monitoring at least once per year to ensure compliance with Title I guidelines. Feedback will be provided to the principal. In addition, emails, staff meetings, and phone conversations take place throughout the year as a means of providing on-going monitoring and communication with the Title I school.

Technical Assistance

Schools are provided a wealth of technical assistance. There is an open door/phone/e-mail/Google Classroom type policy with the Director of Federal Programs. Besides the technical assistance provisions following, principals, assistant principals, bookkeepers, and any other Title I personnel call or email with questions for guidance.

Timeline for Assistance and Monitoring

- March-June: The Bremen City School System will conduct a comprehensive needs assessment comprised of multiple sources of student learning and school processes data and a comprehensive system survey which is shared with all system personnel, local community members, parents and business leaders. Throughout the year, all data is compile, summarized and analyzed in order to plan for the next fiscal year.
- May-July: Revision/Completion of the DOE Comprehensive Needs Assessment (CNA)
- May-August: Schools use summative test results, parent survey results, and other needs assessment data to revise their Schoolwide and System-wide Improvement Plans. Schools involve various stakeholders in the analysis of this data and in the planning for the upcoming year.

- July/August: The Federal Programs Director will attend the Principals' first faculty meeting of the new school year to discuss/reiterate Title I guidelines and requirements for the upcoming school year. The Federal Programs Director, Title I Director, Parental Involvement Coordinator, and Homeless Liaison all share information.
- July-August- Schools will make the CNA available for parent/public stakeholder participation and input into the System Improvement Plans/CNA. Advertised public meetings will be held for community stakeholder input and involvement by the FPD to allow input on the CNA in the spring (April/May) of each year.
- August: Parent's Right to Know/School Status letter sent home via multiple sources (REMIND, School and System Website, Firday Folders, School and Classroom Newsletters, etc.), Parent Involvement Policy sent in school handbooks and posted to school website and system website.
- August: The Homeless Liaison contacts every school to update the system homeless list and to consult regarding the needs of homeless students in our non-Title I schools. The liaison also makes sure that every school has up-to-date homeless contact information posted.
- August-September: The Title I, Part A Parental Involvement Coordinator reviews Title I Schools' Parent Involvement Policies and Compacts. The Parental Involvement Checklist is used to provide feedback. The coordinator also files copies of these documents in the Federal Programs Office.
- August-October: Principals' Attestations and Assurances
- August-October: Principal will present the Targeted Assistance plan and School Improvement Plan to the Federal Programs Director.
- August- May: Schools will provide opportunities for stakeholder input into the CNA through various event opportunities held at the schools. These may include, but are not limited to: School Council meetings, Open House, Title I meetings, PTO meetings. This notification and evidence of participation may be documented through, but not limited to: notices, flyers, invitations, agendas, sign-in sheets, digital responses (The FPD and/or Title I Director will oversee the effort of providing opportunities for input by stakeholders in the CLIP).
- August – May: Annual Surveys of Children in Institutions for Neglected and Delinquent and Homeless (if applicable)
- August – June: Inventory all items purchased by federal programs
- August – June: The Homeless and N&D programs are monitored by the Director of Federal Programs and Homeless Liaison.
- January: Completion of first semester Periodic Certifications
- March-May: Surveys are completed by various stakeholders (parents, teachers, administrators, and community members) to provide needs assessment data for improvement planning. The Federal Programs Office sends the Annual Survey of Parent Involvement to parents to provide information as a means of gauging the effectiveness of parental involvement activities. The Parental Involvement Coordinator and liaisons compile data to determine needs for the following year. Advertised public meetings will be held for community stakeholder input and involvement by the FPD to allow input on the CNA in the spring of each year.
- May-June: Completion of second semester Periodic Certifications
- May-June: The Title I Parental Involvement Coordinator compiles Title I parent surveys and disseminates the results for consideration in the revision of school Parental Involvement Policies and School-Parent Compacts.
- June: Federal Programs Director and staff attend annual state Title Programs Conference
- Ongoing- Throughout the year, all data is compiled, summarized and analyzed in order to plan for the next fiscal year.

- Ongoing- The Parental Involvement Coordinator will hold regularly scheduled meeting to provide opportunities for student achievement updates and stakeholder feedback.
- Ongoing - Budgets and purchase orders are reviewed monthly by the Federal Programs Director to assist schools in spending the funds as planned.
- Ongoing- The Federal Programs Director will provide technical assistance and meet regularly with the Title I principal.

(Evidence to support the above timeline can include but is not limited to: agendas, sign-in sheets, emails, websites, presentation slides and monitoring checklists)

Schedules

School is monitored according to the timeline provided above.

Monitoring of Neglected & Delinquent Facilities

There are no neglected facilities in Bremen City School District. If there ever becomes one, they will be monitored on the same timeline as other schools in Bremen City School District.

Monitoring of Private Schools

The Federal Programs Director monitors participating private schools. Invitations for private schools to consult in participation in federal programs the following calendar year are sent in the fall, usually October, via receipt delivery. A meeting is held, usually the first week in November, to present information about the programs available to students in private schools. Currently Bremen City School District is not serving any private schools.

Data Review

Data review for all schools are compiled and discussed during administrative meetings and at the Board of Education meetings. Schools meet and analyze data with the intent of improving instruction. The Principal will discuss this information with all staff to ensure that they fully understand the data presented. Principal is required to demonstrate to the Federal Programs Director and Assistant Superintendent of Curriculum and Instruction that he fully understands the needs of the school by identifying the root cause of the problems that keep the school from achieving academically. This information is discussed in detail in the updated targeted assistance plan each year.

Reporting and Corrective Action Process (Audit and Monitoring Findings)

Corrective action from previous monitoring is discussed with principals in order to assist them in understanding the critical need for compliance in Federal Programs. In addition, GaDOE monitoring findings from all districts is shared with principals as a means of understanding the impact of noncompliance. Professional learning is provided based on the needs but, in addition, professional learning is used as a preventive measure to ensure that all staff has a clear understanding of all expectations of every facet of federal programs. The Federal Programs Director, along with district level staff, and outside consultants, provide on-going training as a means of ensuring that all staff are in compliance at all times. Anticipatory training is conducted throughout the year that ties in directly with all facets of Federal Program compliance. All correspondences related to Title I are maintained at the

central office level by either the Director of Federal Programs or the Secretary for the Title I Program. The Corrective Actions were shared with the Principals, along with the Corrective Action Plan(s). Technical Assistance is maintained either as an archived email or in a monitoring file to include an agenda and sign-in sheet documenting the assistance.

Equipment Inventory

All schools are required to maintain an active inventory of all items purchased with federal funds. All regular federal program items are marked with a label which has the fiscal year and program. The label is placed on the equipment in a location easy to see. The Federal Programs Director will monitor inventory each year for all federally funded purchases.

Comprehensive LEA Improvement Plan (CLIP) Review Process

CLIP revisions take place annually using prior year data and needs assessment information. The CLIP serves as the plan detailing coordination of various federal programs and identification of needs and in-turn budgeting for such needs with federal funds. Internal and external stakeholders are involved in the revision process.

Bremen City School District CLIP Review Process

The LEA Comprehensive Improvement Plan is updated annually. CLIP revisions take place annually using prior year data and needs assessment information. The CLIP serves as the plan detailing coordination of various federal programs and identification of needs and in-turn budgeting for such needs with federal funds. Department Directors, school and system leaders, as well as community and parent stakeholders are involved in the revision process. All parents are sent information inviting them to participate via mail, email, telephone, newspaper, social media, flyers, website, and newsletters. The district conducts an annual survey each year that allows parents and community members to provide input on district policies and procedures. External stakeholder feedback is examined and considered from these surveys. Documentation includes sign-in sheets, agendas, meeting minutes, emails, and returned plans with comments. Copies of comments are kept on file and put in meeting minutes. Several subsequent meetings are arranged to get input from all stakeholders. For example, input is solicited from district, school, and curriculum leaders at monthly Principal and System Leadership Meetings. Input is also sought from district leaders and parents during the annual district parent meeting. The Federal Programs Director gathers all input and updates the CLIP. The plan is submitted to Superintendent for final approval.

Parental Involvement

Parent Involvement Policy Overview

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

Parent Notification and Communication in an Understandable and Uniform Format

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

Parent Notifications

At the start of the school year, a Priority or Focus School – or the District on behalf of its school(s) – must directly notify parents of eligible Title I students with an explanation of the school's designation status under the ESEA Flexibility Waiver Renewal by such means as regular mail, email, REMIND, social media or a signed and dated acknowledgement of receiving the notification. To document direct delivery to parents, schools must provide evidence of address labels and postage receipts, list of email recipients with documentation of email delivery, or a signed and dated acknowledgement of receiving the notification by parents. In addition to the direct delivery, the notification must be provided in at least one other way such as posting it to the school website. Letters will include all necessary information including CCRPI score (if applicable) and how/where they can find more information about the details of the score and interventions our school provides to address the low achievements of students.

The parent notifications for Title I Schools without Priority or Focus Designations, as well as those with Reward School Designation, do not have to be through a mailed letter or direct delivery to parents. They can be through any other multiple (two or more) means of documented communication, such as posting it to the district or school website, including it in newsletters, REMIND, Friday Folders, etc. Letters will include all necessary information including CCRPI score (if applicable) and how/where they can find more information about the details of the score and an explanation of why our school was named as a High Progress or Highest Performing Reward School.

School Designation Status - Priority Schools

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

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

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

School Designation Status - Focus Schools

Bremen City Schools does not have any schools designated as a Focus School at this time. In the future, if a school does have this designation, the following procedures will be followed.

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

School Designation Status – Reward School Designation

A Reward School is a school with outstanding student achievement or growth over the past three years. There are 112 Reward Schools. The types of Reward Schools are:

- Highest-Performing: schools that are the highest-performing in the state, in terms of schoolwide proficiency, subgroup proficiency, and graduation rates.
- Highest-Progress: schools that have high levels of student growth, measured using their median Student Growth Percentiles (SGP) over time.

Flexible Learning Programs – Bremen City Schools Do Not Have Title I Priority and Focus Schools ...

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

Teacher and Paraprofessional Qualifications

Parents are informed of their rights to know the qualifications of their children's teacher. This information will be sent home to every parent in the beginning of the year in each student handbook. The notice will include the specific contact person and telephone number and email address. This information is also made available through district and school websites.

Parent Involvement Plans

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

Bremen City Schools District Parent Involvement Process

Each school in the Bremen City School System holds an annual open house/registration and parent conferences. These meetings give parents the opportunity to review and provide feedback on system-wide student data, parent activities, district and school Parent Involvement Plans, Targeted Assistance Title I Plans, district and school Comprehensive Improvement Plans. Parents are notified about this opportunity through advertisements in local media, school-level flyers, and by using the calling/text system, email system and the system web site. The school district uses the comments provided by parents during parent workshops, and surveys. After the school system review/revision process, district and school Parent Involvement Plans are made available to parents on the district website. Copies are also available in the Parent Resource Center. Parents are also given the opportunity to provide feedback about Title I programs by completing annual parent surveys. These comments are used by the District and Title I schools when planning parenting programs.

Distribution of Completed Plans

Several plans are shared with faculty, staff, students, parents and community members on the school district web site located at: www.bremencs.com

Plans include district and school improvement plans, parent involvement policies, Title I schoolwide plans, comprehensive LEA improvement plan, parents' right to know, complaint procedures, and policy on ethics and fraud, waste and abuse. Many of these plans are included in student agendas. Parental input into the content of each plan is solicited during multiple meetings throughout the school year but especially at the annual Title I meeting conducted each fall.

School-Parent Compacts

All Title I schools are required to have parent compacts. It is the responsibility of the principal in coordination with the Parent Involvement Coordinator to make sure that all compacts are reviewed and revised annually. The review and revision will occur in the spring of the year at the school council meetings, and parent workshops. Revision dates will be clearly marked on each compact. An invitation will be sent home to all parents in the school and meeting dates will be given in school newsletters and through the school's web site. The Parent Involvement Coordinator (PIC) will be responsible for setting up meetings and collecting required information (agenda, meeting notes, and sign in sheets). Parent compacts will include responsibilities for the teacher, parent, and students. Compacts will be distributed to all parties involved for signatures in the fall of the year. Copies of the signed parent compacts are kept on file in the school's office. The Bremen City Schools Board of Education believes that the public schools belong to the people who create them and that student educational goals should reflect the goals of the community. We affirm and assure the rights of parents to participate in the development of the goals and objectives of the public schools and encourage involvement in all areas of their children's educational experiences.

Annual Title I Meeting

All Title I schools are required to hold an annual meeting at the beginning of school. It is the responsibility of the principal in coordination with the Parent Involvement Coordinator (PIC) to arrange meeting times and invite all stakeholders to the meeting. The (PIC) will be responsible for collecting and submitting documentation of the required Title I annual meeting, including a copy of the sign in sheet, agenda, and minutes to the Title I Director. Meetings are also announced via paper copies to parents, web sites, text system and marquees at each school.

Annual Evaluation

Process to Collect: The annual survey is conducted in the Spring of each year. Schools print all Title information, including the survey, which are also posted on the website. Advertisement of the survey and requests for completion occur through the REMIND, website, various school and system meetings and parent flyers. The survey results are compiled and the following year's parent involvement activities are built from the responses.

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

Actions Taken by LEA to Improve the Quality and Effectiveness of Parent Involvement Policies and Practices: The Title I Parent Coordinator, along with the school level Parent Planning Committee, are invited to review the annual spring survey as well as the results from the previous spring surveys. Additions/deletions/revisions are discussed and agreed upon during this meeting. The formatting or revisions are made after the meeting and then sent back to the committee for comment. If no further suggestions are made, the surveys are sent to schools to print and sent to parents without being embedded in other materials.

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

- Annual Meetings
- Conferences
- Email Communications
- Phone Calls
- Parent Workshops and Activities
- Family Nights
- Volunteering
- Parent Advisory Meetings
- Open Houses
- Annual Notification of School Status
- Newsletters/flyers/brochures
- Website Information
- Board of Education Meetings
- Community Sponsored School Activities

Capacity for Parent Involvement

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

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

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

Parent Resource Centers

All schools have parent resource centers. A variety of materials and resources are available to parents for use at the school for checkout, or as handouts. Many purchases are based upon parent requests on the parent involvement surveys (i.e., helping with homework, information regarding bullying).

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

Required 1% Set Aside for Parental Involvement

Bremen City Schools does not receive sufficient funding to require a parental involvement set aside.

School Improvement Plans

School Improvement Plans are created annually for the school year. School leadership analyzes data to identify and develop solutions to challenges related to instructional strategies, parent involvement, professional learning, and budgets to revise the school improvement plans. During the process of revision, parents are invited to provide feedback. Once revisions are made, the plan is published on the website. Hard copies are also available at the schools.

School Improvement (1003a) Interventions**Monitoring of School Improvement**

Jones Elementary School is a Targeted Assistance Program. This allows all children and all parents an opportunity to have equal access to all related Title I assistance. The LEA will utilize The LEA to build capacity and support the school improvement process in all schools. All schools within an LEA will be involved in school improvement efforts through the work of the LEA, the RESA, and GaDOE. The LEA will work with schools to implement practices that have proven effective with improving schools. The LEA, along with the GaDOE, will establish clear expectations for personnel as they systemically support continuous improvement in all schools.

Review and Approval of School Improvement and Targeted Assistance Plan

School Improvement and Targeted Assistance Plans are updated annually. During school leadership meetings; instructional strategies, parental involvement initiatives, and professional development activities are planned after a careful analysis of various data. Assistance is also provided to schools in their use of school improvement funds to accomplish initiatives in their school improvement and schoolwide plans. It is through this process that the LEA oversees the development of school improvement plans.

Professional Development, Analyzing Data, Technical Support and Assistance

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

Monitoring of Use of Funds

The Federal Programs Director will review and provide recommendations for budgeting decisions.

School Improvement 1003(g)(SIG)

Bremen City School System does not currently have any participating schools in this grant.

ESEA Public School Choice

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

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

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

Enrollment

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

- First- Students who are eligible for free or reduced priced meals and not meeting standards as identified by state assessment results; and if funding levels allow
- Second- Students who are eligible for free or reduced priced meals and meeting standards as identified by state assessment results; and if funding levels allow
- Third – Students who are not eligible for free or reduced priced meals and not meeting standards as identified by state assessment results; and if funding levels allow
- Fourth – Students who are not eligible for free or reduced priced meals and meeting standards as identified by state assessment results; and if funding levels allow

In the future, if a school does have this designation, the following procedures will be followed. Bremen City Schools will send packets of information to students to enroll in a Flexible Learning Program based on four tiers. Tier I students, composed of students who are eligible for free/reduced lunch and are at-risk of failing, will be served first. If funds are still available after Tier I students have enrolled, invitations will be extended to Tier II students (those who are eligible for free/reduced lunch but are not at-risk of failing. Tier III students, those who are not eligible for free/reduced lunch but are at-risk of failing, will be served next if funds still exist. The final group of students, Tier IV, will be served if funds are remaining after the previous three tiers have been served. The initial enrollment will occur in accordance with DOE requirements and dates.

Notification to Parents of Workshop and Eligibility For Services

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

Description of Services

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

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

Submission of the FLP Plan

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

- A list of Title I schools that are required to offer a Flexible Learning Program (FLP), their classification as to Priority or Focus by school and LEA, and the school's Title I status.
- An LEA will project how much the LEA is intending to budget on their Flexible Learning Program (FLP) in the following areas:
 - Administrative Personnel Costs
 - Supplemental Materials / Supplies - LEA office and / or School
 - Evaluation Costs
 - Transportation Costs of FLP Program
 - Instructor Costs – Current Teachers or Contract Instructors
 - Professional Learning Costs
 - Equitable Services for Eligible Private School Students, where applicable
 - Total Cost of the Public School Choice transportation (parent reimbursement and / or school buses), if applicable
 - Required set-asides
 - Other (as approved by the LEAs GaDOE Flexible Learning Program Specialist)

Budgets

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

- LEA's must submit, through the Consolidated Application, the Title I, Part A Flexible Learning Program (FLP) budget as a part of the LEA's Title I, Part A budget. The descriptions of all budgeted items must be specific and clearly describe the intent of the expenditure.
- All items budgeted must meet the allocable, allowable, reasonable, and necessary tests described in the OMB Circulars.
- Are the expenditures allowable Title I expenditures:
- Do the expenditures appear to be necessary in light of the LEAs goals and objectives?
- Are the costs of the expenditures reasonable:
- Are the expenditures for core subject areas?
- LEAs will utilize general guidelines for the use of Title I funds and equipment when submitting a budget for the FLP program. The law provides many flexibilities and opportunities for local educational agencies (LEAs) and schools to meet the purposes of Title I. In schoolwide programs, and LEA may use Title I funds for any activities that are part of the schoolwide program plan. Remember that Priority and Focus Schools may become schoolwide programs with less than a 40 percent poverty level. However, all schoolwide programs must have an approvable schoolwide plan. In targeted assistance schools, however, Title I funds may only be used to meet the needs of participating children, their teachers, and their parents.
- The Elementary and Secondary Education Act of 1965 (ESEA) provides several fiscal requirements that are applicable to Title I, Part A funds. Local educational agencies (LEAs) must maintain the financial effort previously provided with State and local funds to Title I schools. LEAs must provide services to Title I schools that are comparable to those of non-Title I school.
- A local educational agency (LEA) may use Title I funds only to supplement and, to the extent practical, increase the level of funds that would, in the absence of Title I funds, be made available from non-federal sources for the education of students participating in Title I programs. In no case may Title I funds be used to supplant (i.e. take the place of) state or local funds. It is a violation of the supplement, not supplant requirement if an LEA distributes regular state and local funds in a way that discriminates against students in a Title I school. LEAs found to be in violation of the supplement not supplant requirements in the Elementary and Secondary Education Act of 1965 (ESEA) will be required to return all Title I funds used to supplant the LEA's Title I budget. It is important to remember, however, that any determination about supplanting is very case specific; this makes it difficult to provide general guidelines without examining the details of the situation. Because Title I funds are available, the Georgia Department of Education (GaDOE) uses a set of presumptions of what the LEA would have provided in the absence of the Title I funds based on its behavior in other situations. These presumptions are outlined in Office of Management and Budget (OMB) Circular A-133 Compliance.

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

Required Set Aside

Flexible Learning Programs (FLP) are initially be funded through a minimum of five (5) percent set-aside requirement of Title I for all Priority and Focus School status before the 2012-2013 school year. This minimum five (5) percent set-aside must be a LEA set-aside. LEAs have the option of setting aside monies to provide additional interventions for the LEA's Title I Alert schools or Alert Schools have the

option of using a portion of their Title I allocation in order to implement interventions based on their Alert School status; however, Alert Schools are not required to do so.

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

Timeline

August – Develop list of eligible students based on federal tier guidelines.

September – Mail letters home inviting eligible students.

October – Begin serving students using a Flexible Learning Program.

January – Conduct a second enrollment.

April – Conclude program and complete evaluation.

Complaint Procedures

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

Monitoring and Evaluation

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

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

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

Each FLP will be evaluated on the following dimensions:

- Participant Feedback
 - Evaluation Question: What was the overall experience of stakeholders with program?
 - Data Source: Stakeholder surveys
- Service Delivery
 - Evaluation Question: Is the LEA and its FLP program in compliance with laws and regulations?

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

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

Transportation

Transportation is not provided to any student attending Bremen City Schools except for students with disabilities as indicated in their Individualized Education Plan.

Professional Learning

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

Targeted Assistance Programs

Jones Elementary School is the only Title I School in the Bremen City School system and conducts a Target Assistance Program. This allows all children and all parents an opportunity to have equal access to all related Title I assistance. Schoolwide Plans are updated and verified using a checklist at the school after receiving feedback at Annual Title I Parent Meetings. Parents are also invited to a meeting in the spring. All schools will notify stakeholders in multiple ways. Notice of the meeting dates will be placed in the newspaper and on the school web site. Parents will be notified by invitation sent from the school and all other stakeholders will be notified using the school's text messaging system. Parents that cannot attend the meeting will be given the opportunity to obtain a copy from each school and submit input before the final revisions are approved. Revision dates will be clearly marked on each plan. The Parent Involvement Coordinator (PIC) will be responsible for collecting the required information (agenda, meeting notes, and sign in sheets). At these meetings, parents and other stakeholders are given an opportunity to provide input on the Schoolwide Title I Plan, School Improvement Plan, Parent/Student/Teacher Compacts, Parent Involvement Plans, Flexible Learning Programs, and the Comprehensive LEA Improvement Plan.

LEA Guidance

On-site meetings are held with principals to discuss the current status of their plans in regard to checklist components. Missing or items in need of revision are marked on the checklist and then rechecked when the revised plan is submitted. Copies of agendas and sign-in sheets from such meetings should be collected and stored in a Title I notebook as evidence and documentation of meetings. As previously stated, system leaders support schools in developing, revising, implementing and

coordinating school improvement and schoolwide plans during monthly meetings. During the meetings, data is analyzed to identify and develop solutions to challenges related to instructional strategies, parent involvement, professional learning, and budgets.

Development of New Programs

There are no new schoolwide Title I programs in Bremen City Schools. Jones Elementary School is the only Title I school and has Targeted Assistance Title I status.

Targeted Assistance Program Plan Development

The Targeted Assistance program plan is used at Jones Elementary School. This plan is presented, reviewed, and revised annually by school stakeholders. Suggestions for revision of the T/A plan occur at the annual meeting, which includes a discussion of the required component of a T/A program. After revisions are made, parents are sent a letter stating the plans can be accessed online, at the school, or a hard copy can be mailed to them upon request. This occurs through a flyer that is sent home with students.

Sign-in sheets and agendas are required and collected from the annual meeting and other meetings. On-site meetings are held with principals to discuss the current status of their plans in regard to the checklist components. Missing or items in need of revision are marked on the checklist and then rechecked when the revised plan is submitted.

Parent advisors during the annual meeting concur that the most effective use of funding is in human resources and budgets are developed around human and material needs, as well as professional learning and parent involvement.

Plan Consolidation

Bremen City School System does consolidate School Improvement plans.

Consolidation of Funds

Bremen City Schools does not consolidate federal funds.

Accountability

Audits and Cross Functional Monitoring Findings

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

Steps to Audit/ Monitoring Resolutions:

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

Fiduciary Responsibility

Maintenance of Effort

GADOE compares the fiscal effort of the preceding year to the second preceding fiscal year and makes the maintenance of effort determination available to the system through a marked “met” or “unmet” on the consolidated application. Documentation for MOE is only required for districts that do not meet the required maintenance of effort. The Federal Programs Director will pull the MOE information from the Consolidated Application each school year for documentation purposes.

Attendance Area Determination

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

Allocations and Carryover

Allocations

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

Carryover

The Federal Programs Director tracks the spending of each program/school through the year via budget sheets. At the end of the school year, carryover information is updated and reviewed. Parent involvement, Flexible Learning Programs (FLP), and professional development for Alert, Focus, and Priority schools are taken into consideration.

Reservation of Funds

Flexible Learning Programs (FLP): Bremen City Schools has no Focus Schools and is not required to establish a set aside of 5% for FLP.

Professional Development: Bremen City Schools does not have any designated Focus Schools and is not required to establish a Professional Development set aside.

Homeless Children and Youth: Title I schools are required to set aside funds within their budgets to meet the needs of homeless children and youth. The Federal Programs Director, who is also the Homeless Liaison, annually determines the amount of funds needed to adequately meet the needs of homeless students. The Federal Programs Director trains school personnel including: counselors, Parent Involvement Coordinator, as well as clerks, teachers, and principals to identify children in homeless situations. A home survey is also used to identify homeless students. The Federal Programs Director is consulted if any staff member suspects that a student qualifies for homeless services. The Federal Programs Director then investigates the situation and makes the ultimate determination on whether or not students qualify. When a student qualifies for homeless services notes are maintained related to the situation and an email is sent to the Student Information Coordinator and the Director of Food and Nutrition. Homeless set aside funds are used to purchase needed supplies for identified homeless students on an as needed basis.

Neglected and Delinquent Children: The reservation amount provided by GADOE in the Title I, Part A allocation letter and worksheet is the amount set aside for neglected and delinquent children. Currently, there is no residential facility for neglected children within Bremen City Schools' service area. The Annual Survey of Local Institutions for Neglected and Delinquent Children is completed each year and shows that no facility is available.

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

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

Expenditure of Funds/Procurement Standards

Upon receiving allocations, the LEA will use a spreadsheet to develop a budget for the use of federal funds. Upon completion of the budgeting approval process with school and system Federal Program funds, the budget will be entered into the consolidated application system. Once approved at the state level, the Director of Finance will then enter the budget into the financial system software. The Director of Finance will review the budget entered into the financial system against the consolidated application for accuracy and allowable use of funds. Any discrepancies between the entered budget in the local system and the consolidated application must be corrected prior to spending and draw-down of funds related to spending.

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

Allowable, Reasonable and Allocable

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

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

Any purchases made with Federal Program funds must follow the guidelines for allowable costs, as well as guidelines detailed in EDGAR, OMB Circulars (such as A-87), and any other State and/or Federal program guidelines. Purchases made with Federal Program funds will also adhere to any memos, letters, and/or communication regarding allowable/unallowable purchases. The Federal Programs Director will direct any questionable expense to the Area Program Specialist for further clarification.

Title I funds cannot be used to purchase incentives for students, teachers, or participation in professional learning activities. Food for parent involvement must be considered “light refreshment.” “Light refreshments” has been defined as donuts, fruit, muffins, juice, coffee, chips, pretzels, popcorn, raw vegetables and dip, nuts, cookies, brownies, punch, soda, and water. “Light refreshments” does not include pizza, sandwiches, or anything that could be considered any part of a meal. Title I funds can only be expended for those events that “build capacity.” This means you can fund a snack for a *workshop teaching parents a specific skill*, but could not give snacks to parents volunteering.

The Federal Programs Director will inform personnel of preliminary budgets once this information becomes available from GaDOE. Copies of the meeting agenda and minutes will be kept on file. The local board of education will be informed periodically throughout the year of federal grant budgets/expenditures.

Budget Approval Process

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

- The Director of Federal Programs receives a monthly expenditure report from the Finance Director that is reconciled to actual expenditures to ensure accuracy and the reconciliation of discrepancies.

Periodic Certification

Periodic certifications for all staff paid from Federal Program's funds occurs after-the-fact twice a year. The process takes place after first semester, and then again after second semester. The forms are signed by Federally funded staff and the building level administrator and are kept on file at the system level. This process is monitored by the Federal Programs Director.

Split-Funded Personnel

Bremen City School System regularly conducts time and effort monitoring on split-funded personnel.

Capital Expense Funds

Bremen City School System does not use Title funds to budget items under object code 700 (capital expense).

Consultants, Contracts, Purchased Services for Title I Funds

Bremen City Schools does not currently use Title I Funds for consultants, contracts or purchased services. If we choose to do so at a later date, the following guidelines will be used:

- Contracts are required for all consultants and purchased services. Agreements are entered into between Bremen City Schools and the consultant.
- Contracts are generated by Title I Director
- Specific duties are spelled out for each contract.
- The person must also submit to be fingerprinted if they are working with students.
- The contract includes the number of hours to work and the rate of pay.

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

Travel Expenses

All travel reimbursements are made according to state travel regulations.

Supplement vs. Supplant

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

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

Respond "NO" to the following questions:

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

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

- (g) Does federal, state, or local law require this program?
- (h) Did the school provide the program with non-Title I funds in prior years?

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

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

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

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

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

Comparability of Services

All schools within the Bremen City School System except Jones Elementary are not Title I. Therefore, it is not necessary to complete comparability of services.

Equipment and Real Property

Title I inventory is maintained on a spreadsheet by the Federal Programs Director that identifies the item, serial number, and vendor, date of purchase, cost, and location. Equipment purchased with Title funds is permanently marked with "Title I" and the fiscal year in which the equipment was purchased. Physical inventories are conducted annually.

Inventory

Inventory of all equipment and property belonging to any federal program will be identified and inventoried annually. A building-level administrator will verify an inventory of items purchased with Title funds and the Federal Programs Director will randomly spot-check equipment. Materials purchased for use in federal programs will be labeled and be utilized in the capacity for which it was purchased. Any equipment, materials and/or supplies purchased with federal funds are considered solely for the use of that program.

In the event the equipment is no longer usable or the federal program closes, materials and equipment will be disposed of following the Bremen City School System's disposal procedures. Equipment that is damaged, lost, or stolen will be reported to the Federal Programs Director. A police report will be required for stolen property. Lost equipment will be verified by the principal and noted in the inventory.

Lease of Equipment

Bremen City Schools currently has no leases.

Site Visits

Random site visits may occur throughout the school year. For formalized monitoring, at least one scheduled site visit will take place by the Federal Programs Director. During the formalized site visit, the principal along with any individuals working with the Title I budget and/or Title initiatives will meet with the Director to review procedures and pertinent information. During the site visit, the Federal Programs Director will work with principals to correct any findings and answer any questions.

Equipment Disposition Procedure

When computer equipment is no longer operational, it will be recycled or disposed of. Schools are given the opportunity each summer to dispose of technology that is out of date or no longer operational. The appropriate Technology Disposal Form should be completed and a copy sent to the Title I Director. Inventory records will need to be corrected, printed, and maintained by school Federal Programs Director. At the designated time, the outdated technology is brought to a predetermined location to be recycled under the direction of the Technology Director. The Technology Department will dispose of and recycle all equipment. The technology department will present the Federal Programs an assurance stating that all data has been removed from all technology devices. Currently, the school system does not receive any money for the recycle or disposal of equipment.

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

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

Cash Management/Internal Control Procedures

Segregation of Duties

Requisition Process:

Upon budget approval, requisitions are submitted by the designee and forwarded to the Federal Programs Director for approval. Requisitions are then approved by the Director of Finance and Superintendent. The approved requisition is forwarded back to originating designee to initiate purchase. Goods are received at the school or other location and receiver checks to make sure the order is correct and complete. When the invoice is received at the central office from the vendor, A/P matches the invoice to the PO and obtains approval of payment from originator and Director of Finance. After approval is obtained, A/P enters the amount into PC Genesis as a claim. Checks are processed for mailing. A check register is produced by PC Genesis and signed off by the Director of Finance and Superintendent for each check-run and kept on file in A/P. A copy of each check is attached to PO and invoice and filed in A/P office. Checks are then mailed.

Draw Down of Title Program Funds

The Finance Director will draw down funds in a timely manner. Drawdowns are always requested for funds expended in previous month (s). After drawdowns are completed, the Finance Director will provide the Federal Programs Director with a copy of the DE 0147. DE 0147 is signed off by Director of Finance; Director of Federal Programs, and when applicable, Director of Title II. Monthly drawdown amounts are presented to the Board of Education each month as part of the financial report. This process will occur more frequently when spending warrants it.

Bremen City Schools use the indirect cost calculation, chart of accounts, and Grants Accounting Online Reporting Systems (GAOPS) provided by GaDOE to plan, budget, expend, and draw funds. School and district level budgets are also built based upon the required set asides and amounts for neglected students, private school participation, homeless, parent involvement, professional learning for highly qualified teachers, and the other general provisions as required (public choice and supplemental services).

Reimbursement for Travel

Employees request "prior approval" for all travel. Prior approval forms are forwarded to the Federal Programs Director for final approval of alignment of travel with GaDOE approved Title program budgets. These forms are then coded, copied, filed at central office, and the original returned to school principals who notify the school administrative assistant who codes the substitute sheet for proper reimbursement. Bremen City Schools does not provide cash advancements. Employees pay for lodging, meals, and travel expenses in advance and are reimbursed according to the Statewide Travel Regulations after these costs have been incurred. The system approved travel expense statement form must be utilized for requesting reimbursement. Hotel receipts and conference agenda must be attached

to obtain reimbursement for lodging over overnight travel. Meals and mileage are reimbursed according to the State of Georgia guidelines.

Monitoring Financial Aspects of Title Program Funds:

The program director for Title and the finance director monitor monthly expenditures using general ledger detail reports to insure program expenditures are in alignment with the approved budget and that they meet and do not exceed the grant award.

The Federal Programs Director requests monthly budget detail reports to verify that only approved Title program purchases were paid from the appropriate Title program funds. If errors are found, the Title director and finance director meet to resolve the discrepancy. The Title director is responsible for asking for the monthly budget detail reports and the financial director is responsible for providing the report. The Federal Programs Director is responsible for bringing any discrepancies or an "all clear" report to the Finance Director. The Finance Director is responsible for working with the Federal Programs Director to resolve the discrepancy. The print out of monthly expenditures and budget sheets will be kept on file in the Title Director's office in the appropriate Title program notebook.

Reporting Procedures

Copies of completion reports for the previous fiscal year will be kept on file in the Finance Department. Accounting records to support the results of outlays (expenditures indicated in the completion report) will be kept on file. Copies of expenditure (cumulative through) reports for the respective quarter for total expenditures reported to GaDOE will be kept on file. Federal Programs Director will run budget summary and detailed expenditure reports for all federal funds.

Services for Homeless Children and Youth

Bremen City Schools homeless liaison works very closely with school guidance counselors to assure students receive needed services.

Identification

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

Program Procedures

- The district is responsible for identifying a homeless liaison.
- Homeless students will be identified based on the definition prescribed by McKinney-Vento Homeless Assistance Act and via a numeric code in the district's student information system. All staff in the district will be trained in the identification and recruitment of homeless students.
- The homeless liaison will provide annual training for all district level and school staff having contact with homeless students.
- All principals will receive annual training on the identification and needs of homeless students.
- All schools will display flyers, brochures, and posters that identify the Homeless Liaison contact information.
- Services for homeless students (tutoring, etc.) will be evaluated based on student academic achievement.
- Follow BOE policy

School Selection

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

Enrollment

Enrollment of Homeless students occurs at the appropriate school to which they are assigned based on their grade level. School registrars are trained and attentive to the identification of homeless students during the enrollment process. Additionally, students and/or parents have an opportunity to mark "Homeless" on their free/reduced application. Applications marked "Homeless" are immediately submitted to the Homeless Liaison for further investigation.

Information Dissemination

The Homeless Coordinator and/or Principals provide information to faculty and staff on the Homeless Program annually in the fall. The Parent Involvement Coordinator distributes posters and brochures in the counselor's office and Parent Involvement Resource Room in each school.

Transportation

Transportation is not provided to any student attending Bremen City Schools except for students with disabilities as indicated in their Individualized Education Plan.

Disputes (Complaint Procedures)

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

Services for Neglected and Delinquent Children

The purpose of Title I, Part D is to improve educational services for children and youth in local and State institutions for neglected or delinquent children and youth so that such children and youth have the opportunity to meet the same challenging State academic content standards and challenging State student academic achievement standards that all children in the State are expected to meet. The purpose is also to provide such children and youth with the services needed to make a successful transition from institutionalization to further schooling or employment and to prevent at-risk youth from dropping out of school, and to provide dropouts, and children and youth returning from correctional facilities or institutions for neglected or delinquent children and youth, with a support system to ensure their continued education.

There are no neglected institutions within the boundaries of the Bremen City School System. If a neglected institution were to move into the boundaries of Bremen City Schools, funds would be set aside in the Title I budget for their students. These funds would provide an afterschool tutor, as well as supplies and computers on an as needed basis.

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

Class Schedules and Calendar

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

Parental Involvement

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

Title VI, Part B – Rural and Low Income

Purpose

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

Use of Funds

An eligible LEA may use RLIS funds for:

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

Pre-Kindergarten Programs

The district does not reserve funds for pre-kindergarten programs at this time. The Pre-K Director meets with area Head Start and private daycare centers to discuss potential concerns. Policies and procedures will be put in place if the district determines that this is a Title I need in the future.

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

Title II, Part A - Teacher and Leader Effectiveness

Purpose

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

Equity Belief Statement

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

Comprehensive Needs Assessment Process

The Bremen City School System conducts a comprehensive needs assessment comprised of multiple sources of student learning and school processes data and a comprehensive system survey which is shared with all system personnel, local community members, parents, and business leaders. Throughout the year, all data is compiled, summarized and analyzed in order to plan for the next fiscal year.

Equity Action Plan

The LEA Equity Action Plan for Title II-A is drafted/ revised each May/June using the Equity Data Profile provided by DOE, and data from the comprehensive needs assessment. The Equity Action Plan serves as the plan to correlate equity action strategies with the system's equity needs. A minimum of two equity gaps must be selected to address the needs of poverty and minority students. The plan will include the equity gaps and will describe how equity interventions will be implemented, monitored, and measured for effectiveness. The description also will include the person responsible by position and timeline for implementing, monitoring and analyzing data to determine effectiveness of implementation. The description also will include the data that will be gathered and analyzed to determine effectiveness. Stakeholders will be involved in the drafting/revision process of the Equity Action Plan. Meeting agendas and sign-in sheets will be maintained as evidence and documentation of stakeholder involvement.

Prioritization of Needs

Internal and external stakeholders are involved in the planning/ revising process by assisting with prioritizing of needs. The process of prioritization is accomplished by gathering and examining responses to various questions on the annual needs assessment, other system/school surveys and analyzing student data (e.g. DOE profile data, demographics, attendance, and achievement). Information and feedback are gathered, summarized and shared with stakeholders. The LEA then encompasses all information to develop a prioritized list of needs.

Authorized Use of Funds

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

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

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

Professional Learning

Professional Learning must be of high quality, scientifically research based, sustained, intensive, and classroom-focused in order to have a positive and lasting impact on classroom instruction and the teacher's performance in the classroom. It also must address one or more of the annual LEA prioritized needs. Finally, professional learning must focus on increasing the ability of the teaching staff to help all students achieve high academic standards, or the school administrative staff to lead their schools' efforts to increase student academic achievement. Each year, Bremen City Schools requires 20 hours of professional learning (job embedded and part of a professional learning community) of all certified

employees. The system monitors this by requiring each school to maintain a professional learning log/spreadsheet of all staff at each school. The principal of each school will sign the spreadsheet indicating they have assured all staff have attended the required PL opportunities. This spreadsheet is submitted to the Title IIA Director and kept on file at the District office.

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

The LEA discusses the recruitment, placement, and retention of highly qualified, effective teachers and leaders during monthly meetings as necessary. The topic is also discussed as part of a review of data from the system annual needs assessment. The Director of Title II-A provides each principal with a report of the level of retention from the previous school year and improvement with the placement of highly qualified, effective teachers for the upcoming school year.

Teacher Experience and Effectiveness Equity

To provide meaningful feedback and support to achieve the goal of increasing academic learning and achievement for all students, teachers are evaluated by the Teacher Keys Effectiveness System (TKES) with a Full (4 classroom walkthroughs and 2 formatives) or Modified (minimum of one walkthrough and one formative) evaluation plan. Implementation is determined as a result of teacher effectiveness. Highly effective teachers are eligible to receive fewer observations, while new and ineffective teachers will receive six observations. Identified inequities in teacher experience will be addressed at the school and classroom level by re-assigning personnel and students as necessary to ensure that all students have equitable access to experienced teachers. A list of inexperienced and ineffective teachers will be maintained at the school level. Rosters will be maintained for students assigned to any teacher on the lists. These rosters will be used the following school year to ensure that students are not assigned to an inexperienced and/or ineffective teacher two years in a row.

Retention

Teacher retention is analyzed annually in order to determine if a particular school may be experiencing a high teacher turnover. Teacher and Leader surveys are used to gather information concerning retention. A system wide New Employee Induction Program is implemented prior to the beginning of each new school year. The agenda for the program is developed and conducted by system wide support staff. Each school principal facilitates an on-going orientation and induction process for new staff assigned to their school.

Class Size Equity

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

Meeting the Diverse Needs of Students

As part of the Teacher Keys Effectiveness System, walk through observations are conducted by building level administrators to ensure all classrooms follow the instructional guidelines of a standards-based classroom. Differentiated instruction is an ongoing area of improvement to meet the diverse needs of students. In order to determine and plan for professional learning initiatives, multiple data sources (vertical alignment meeting minutes, student achievement results, observation data from TKES, perception surveys, etc.) are utilized.

Procedures for Principal's Attestations/Certifications

The Director of Federal Programs will prepare a memorandum requesting principals sign the attestation forms. The principal attestation form is provided to the principals at the beginning of the year and a due date is also provided. Copies of the attestations are maintained at each school, at the district office, and are available to the general public upon request.

Procedures for HiQ

All Bremen City School teachers are required to meet HiQ status. Professional learning opportunities are paid for with local funds to help all teachers meet HiQ status, if necessary.

Highly Qualified Teachers

Bremen City School System systematically monitors the Hi-Q status of its teachers. A written remediation plan is created for each teacher who does not hold a valid clear renewable certificate or that is not highly qualified. The plan is monitored supported with local funds. Bremen City Schools requires that all school principals work with the non-HiQ teacher to develop a remediation plan. The remediation plan is kept on file at the school and district level. It is the responsibility of the principal and the Title IIA director to periodically review the plan and monitor its' completion.

Procedures for Hiring Instructional Paraprofessionals

Paraprofessional vacancies are advertised with the use of the System Website. A job description is included and Paraprofessionals Education Requirements are listed, including:

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

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

Procedures for Parent Notification of Non-HiQ

Principals will adhere to parent notification requirements for non-HiQ staff. Copies of the parent letter will be kept on file at the local school, as well as a copy will be submitted to the Title II Director to file at the system level.

Purchased Equipment/Inventory

Currently, Bremen City Schools does not use Title II funds for the purchase of equipment. In the event this becomes an identified need, the district will utilize the following process: A designee selected by the principal maintains inventory at the school level. Inventory is documented in a database that is updated each time equipment is purchased. All Title II property is identified by permanent markings on

the equipment that signify Title II and the fiscal year the equipment was purchased. The database includes a description of the item, serial number, and vendor name, date of purchase, funding (Title I, Title II, MV, Title III, Title VI, Sp. Ed., Migrant, SIG), cost, school, equipment location, and current condition. School personnel must annually verify the location and condition of the equipment. Each item must be checked/noted on the inventory record specifically for condition and location. Principals attest that the equipment is as identified on the inventory record submitted to the Federal Programs Director. Technology personnel help determine the condition of equipment. When a piece of equipment needs to be disposed of, disposal forms are completed and kept on file. Disposal occurs according to the Bremen City Schools disposal procedures. Hard and electronic copies of the inventories are filed with the Federal Programs Director. The Federal Programs Director conducts onsite monitoring of inventory at least three times a year.

Private Schools

There are no Private Schools within the boundaries of the LEA; however, in the event there are private schools within the boundaries, the following procedures would occur: Private school contacted via certified letters of their eligibility of limited English proficient and Immigrant students to participate in Title II, Part A services. 2. Letters distributed twice a year in the fall and the spring. 3. A meeting involving all private schools within the boundaries of the District invited to attend.

Title II Director maintains an agenda and sign-in sheet for all Private School meetings.

Effectiveness

The Title II Director will prepare a report on the effectiveness of each budget line item in the Title II, Part A program. The report will include a review of data to summarize the effectiveness of all funded activities.

Title III: English to Speakers of Other Languages

Purpose

An ESOL program plan is designed to provide consistent and non-discriminatory procedures throughout each school within Bremen School District as recommended by the U.S. Office for Civil Rights, Department of Education. The Civil Rights Acts of 1964 requires local school districts to provide an alternative program of service when there are students who are limited English proficient and are unable to participate effectively in the district's regular instructional program. Bremen City School District has an EL Plan for 2015-2016 that is located in the Federal Programs Director's Office and emailed to all ESOL teachers and school leaders. The plan includes EL procedures, evidence of policy dissemination to local schools, research-based delivery models used at each school, description of how ACCESS and GA Milestones data are used to make instructional decisions, evidence of adjustments to services based of assessment results, progress monitoring procedures for EL students, and the process and criteria used for transitioning ELs to monitored status. Each school codes all EL eligible students in the student information system (Powerschool). LEA professional development plan for ESOL, including needs assessment, long-range professional development goals, meeting dates, session agendas, handouts, and sign-in sheets. All information concerning Title III is kept by the Director of Federal Programs. Title III purchase orders, budget, and after-the-fact (January and May) periodic certifications are monitored and kept on file in the Federal Programs office. Bremen City Schools has no private schools requesting to participate in the Title III program. Private Schools within the boundaries of the

LEA are contacted via certified letters of their eligibility of limited English proficient and Immigrant students to participate in Title III, Part A services. Letters are distributed twice a year in the fall and the spring. A meeting is planned where all private schools within the boundaries of Bremen City Schools are invited to attend. The Director of Federal Programs maintains the agenda and sign-in sheets for the Private School meetings.

Student Assessment and Enrollment Procedures

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

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

Exit Guidelines

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

Students in grades 1-12 who score a Composite Performance Score of 5.0 or higher on the Tier C version of the ACCESS for ELLs and a "Meets Standards" score on the grade level state-mandated reading assessment are considered English proficient and are to be exited from language assistance services.

Students in grades 1-12 who score at or above 4.8 on Tier B or C on ACCESS may be referred for Language Assessment Conference which can determine whether a student remains in the program or may exit based on a review of language proficiency, classroom performance and achievement, teacher recommendations, criterion-referenced tests, and writing samples.

Students in grades 1-12 who score below 4.8 Literacy Sub-Score on ACCESS for ELLs Tier B or C, may also be referred for a LAC where the decision to remain or exit is made.

Students in grade 1-12 who score at or above 4.8 Literacy Sub-Score on ACCESS for ELLs Tier B or C automatically exit the program and are monitored for two years.

According to GaDOE guidelines, "ELs who meet the criteria for proficiency are no longer eligible for language assistance services and must be exited. Title III law requires that districts monitor ELs for 2 calendar years following exit from language assistance services. If an exited student transfers from

another state or a private school and the two-year monitoring was not completed prior to enrollment, the district is required to monitor the student for the remainder of the monitoring period. The district must maintain documented evidence that the student was monitored throughout the two-year monitoring phase.” To ease the transition from served to monitored status, ESOL teachers continue to monitor student grades, attendance, and discipline to ensure students are progressing and performing well academically. ESOL teachers continue to correspond with regular education teachers of monitored students if the data indicates students may be struggling in one or more areas. If needed, the ESOL teachers meet with monitored students to assist them in any areas in which they may be struggling.

Funding

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

Professional Learning

ESOL teachers will meet with every regular education teacher of EL students and administrators to ensure understanding of the WIDA standards and Can Do Descriptors. ESOL teachers will also provide W-APT and ACCESS scores for every student and assist teachers with understanding appropriate expectations based on these scores and the student's level of language acquisition. Two meetings will be held yearly with parents of EL students to inform them of ways to assist their students academically, as well as make them aware of school programs and activities.

Program Evaluation and Accountability

The success of the ESOL instructional program will be measured by analyzing the results of ACCESS and other state mandated tests. As a result of this analysis, differentiated instructional decisions will be made for individual students, including adjusting services if indicated.

Services for Private Schools

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

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

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

ensure appropriate and equitable participation.

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

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

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

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

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

Documentation for Participation

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

Identification of Participants

LEA works closely with the private school to verify attendance area of possible students. It is the responsibility of the private school to provide potential students names, addresses, and verification of free and reduced participation for qualification of the student.

Finance

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

Complaints

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

Evaluation

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

Equipment

The private schools will follow the same procedure as Bremen City Schools.

Timeline for Private Schools

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

Academic Achievement Awards Program

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

(1) Highest-Performing Reward School – a Title I school among the Title I schools in the State that have the highest absolute performance over a number of years for the All Students group and for all subgroups based on statewide assessments, and, at the high school level, is also among the Title I schools with the highest graduation rates. A school may not be classified as a Highest-Performing School if there are significant achievement gaps across subgroups that are not closing in the school; or

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

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

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

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

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

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

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

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

Bremen City School district uses the occupational survey provided by the MEP coordinator to identify migrant students. A system liaison from the Migrant Educational Program (MEP) makes contact with each migrant family to determine case-by-case eligibility and needs. Migrant students are evaluated academically the same as other students in the system to determine academic needs. All migrant students are eligible for Title I services, and receive appropriate Title I services. In addition a referral is made to student services to indicate that additional services may be needed from that department. Additionally, specific activities to address the needs of migratory families are provided. Such activities shall include informing children and families of, or helping such children and families gain access to other education, health, nutrition and social services. A migratory Parent Advisory Council (PAC) program is provided in conjunction with other Parent Involvement Programs. Parent outreach is provided in a language that is understood by the family if at all possible. A translator is used for translation when needed. Parents are presented information on ESOL, special education, gifted, and other educational programs. Information on health, nutrition and social services is presented using materials from the migrant educational agency. Presenters from local agencies such as, the Health Department, DFACS, and County Extension office may be involved.

Charter Schools

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

Special State Charter Schools

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

Race to the Top (RT3) Project Management and Sustainability

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

Complaint Procedures

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

Ethics and Fraud, Waste, Abuse and Corruption

The Director of Federal Programs reviews the ethics and fraud, waste, abuse and corruption policies with all administrators during the summer. An agenda and sign in sheets will be kept by the Director to document this has been completed. This same information is discussed with all system personnel during pre-planning annual system wide faculty meeting. The Director of Federal Programs maintains agendas and sign-in sheets to verify the policies have been reviewed with all staff. A signature, by the person reviewing the policies, verifies the completion of this procedure. Principals are expected to inform their faculties about policies and updates as they are approved throughout the year. New teachers also receive the same information during New Teacher Orientation.

Ethics

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

1. Misusing public or school-related funds;
2. Failing to account for funds collected from students or parents;
3. Submitting fraudulent requests or documentation for reimbursement of expenses or for pay (including fraudulent or purchased degrees, documents, or coursework);
4. Co-mingling public or school-related funds with personal funds or checking accounts; and

5. Using school property without the approval of the local board of education/governing board or authorized designee.

Reporting Suspicion of Fraudulent Activities

- Purpose:** To ensure the reporting of suspicion of fraudulent activity, the Bremen City Schools provides employees, clients and providers with confidential channels for such reporting.
- Definitions:** Fraud: A false representation of a matter of fact, whether by words, by conduct, or by concealment of that which should have been disclosed, that is used for the purpose of misappropriating property and/or monetary funds.
- Statement of Administrative Regulations:** The Bremen City Schools thoroughly and expeditiously investigates and reported cases of suspected fraud to determine if disciplinary, financial recovery and/or criminal action should be taken.
- Confidentiality:** All reports of suspected fraud must be handled under the strictest confidentiality. Only those directly involved in the investigation should be provided information regarding the allegation. Informants may remain anonymous but should be encouraged to cooperate with investigators and should provide as much detail and evidence of alleged fraudulent acts as possible.
- Procedures and Responsibilities:**
1. Anyone suspecting fraudulent activity should report their concerns to the Bremen City Schools, School Superintendent, or Finance Director at 770-537-5508.
 2. Any employee with the Bremen City Schools (temporary staff, full-time staff and contractors) who receives a report of suspected fraudulent activity must report this information within the next business day.
 3. Employees have the responsibility to report suspected fraud. All reports can be made in confidence.
 4. The Bremen City Schools Board of Education shall conduct investigations of employees, providers, contractors, or vendors.
 5. If necessary, the person reporting will be contacted for additional information.
 6. Periodic communication through meetings should emphasize the responsibilities and channels to report suspected fraud.

Conflict of Interest

No employee of BCS shall engage in or have a financial interest, directly or indirectly, in any activity that conflicts or raises a reasonable question of conflict with assigned duties and responsibilities. Employees shall not engage in any work of any type where the source of information concerning customer, client, or employer originates from any information obtained through the school system.

No employees, officer, or agent of BCS 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. In addition, no employee, officer or agent of the district may neither solicit nor accept gratuities, favors, or anything of monetary value from contractors or parties to subcontractors. All employees shall comply with the Code of Ethics shall be subject to disciplinary action, including but not limited to, termination of employment with the district.

Assessment Security

Testing Coordinator: Bill Garrett

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

1. Each school has an assigned School Test Coordinator.
 - The Assistant Principal of Jones Elementary School, Mr. Whitt Brown, has supervisory authority over the Test Examiners and is responsible for the security of the testing materials while in the Elementary School.
 - The Assistant Principal of Bremen Academy/Bremen Middle School, Mrs. Ashley McGill, has supervisory authority over the Test Examiners and is responsible for the security of the testing materials while in the Middle School.
 - The Assistant Principal, Mr. Robert Dorch has supervisory authority over the Test Examiners and is responsible for the security of the testing materials while in the High School.
2. Each School Test Coordinator and their assistants receive training from the System Test Coordinator.
 - School Test Coordinators receive initial training on the State Assessment Handbook policies and procedures each August as the new Handbook is made available from the DOE. A copy is made and given to each School Test Coordinator for their office.
 - Training includes our local BOE policies and procedures.
 - Extra time and special consideration is given to testing security and the testing of special populations as those items may change from year-to-year.
 - Each School Test Coordinator is trained additionally and specifically prior to the administration of any norm-referenced and/or state mandated test. Specific procedures and policies are reviewed with the System Test Coordinator.
 - Confidentiality and the required security procedures from the GaDOE and BOE are reviewed and this information is signed by the School Test Coordinator to certify that this information was reviewed thoroughly prior to the receipt of every assessments' materials.
3. Each school has established a program and schedule to ensure that all Test Examiners, Proctors, and Monitors are properly trained for each test administration.
 - School Test Coordinators prepare agendas and training material to ensure training adheres to state and local regulations.
 - Each Test Examiner and Proctor signs appropriate forms indicating review of security and confidentiality procedures before, during, and after testing.
 - All Test Examiners are trained during a faculty meeting for each test administration ensuring specific training that may be required for different assessments.
 - Extra certified teachers are trained in the event of an absence or emergency.

- All training participants sign indicating their training for each specific test.
 - Principals are present at each training session.
4. A testing roster is developed for each Test Examiner.
 - Roster is reviewed to ensure that no relative is inadvertently placed in the testing room of a guardian or relative.
 5. A master list of all students and their accommodations is verified by School Special Services Director prior to testing and scheduling.
 6. All Test Examiners of students with special accommodations are trained in a second session.
 - This allows each test examiner to review in the Test Administrator's manual the precise wording allowed by the GaDOE. The oral reading is explained in detail within the Examiner's Manual provided by the GaDOE. This includes voice tone, inflections, timing, and any allowed repetitions.
 - Test examiners review students' accommodations. (see attachment entitled "Accommodations Matrix") The Accommodation Matrix is included in testing tub which is distributed to Test Examiner on the day(s) of the test(s).
 7. All test materials are in a secure room which only a Master/Master key can unlock and an additional deadbolt and its key. Only the School Test Coordinator and System Test Coordinator have access to the keys to the deadbolts. Rooms are kept locked at all times while testing materials are in the room.
 8. All test materials are signed for by the School Test Coordinator when delivered to that secure testing room.

After Receiving Test Materials in the School

9. School Test Coordinator ensures integrity of the security of the testing storage area.
 - Keys are the sole responsibility of the School Test Coordinator.
 - No one is allowed in testing storage area without the School Test Coordinator or her designee.
10. School Test Coordinator manually counts all testing materials.
 - Any discrepancies are reported to System Test Coordinator and then to GaDOE.
 - School Test Coordinator retains all lesson plans once test materials are moved to individual schools to support that test review was never altered as a result of tests being on site.
11. School Test Coordinator prepares containers at each school for each testing room with the exact quantity of materials, rosters, and accommodations if indicated.
 - School Coordinator prepares test containers as indicated by state requirements.
 - School Coordinator places test booklets with same form number if oral reading is required.
 - School Coordinator secures all prepared tubs in testing storage room.
 - School Coordinator prepares form with the inventory number of each test booklet assigned to the individual student that is signed out and signed back in by the Test Examiner each testing day. Test Examiner and School Test Coordinator or Assistant School Test Coordinator verify and sign that the count is correct in the presence of each other. A sample verification form is included as an attachment to this document.
12. Teachers remove/cover all instructional materials from walls, cabinets, and desks in the classroom several days prior to testing. Only a wall clock is permitted.
13. Desks are placed in positions to discourage any communication and cheating among students.

14. School Principals conduct a walk-through in every classroom several days prior to testing and verify the classroom as “test-ready”.
15. Test Monitors are available in each hallway during each day of testing should assistance be necessary.

During Testing

16. #2 non-mechanical pencils with erasers are provided to students.
17. Test Examiner writes the inventory number/form number of test booklet assigned to each student in the testing room.
18. Test Examiner verifies that student has bubbled correct form number and required demographic information.
19. Test Examiner records start and stop time of each testing session.
20. Test Examiner reads the test script *exactly* as directed with no deviations.
21. Test Examiners and proctors routinely walk by student desks to monitor students are following directions and are working in the correct test sections and answering in the appropriate section of the answer document.
22. Test Examiner notes any unusual occurrence on the testing log or roster that could cause an inflated or deflated score.
23. Any transfer of student answers to a new answer document due to erasure holes, etc. is documented on a form that witnesses sign at the time of the transfer. School Test Coordinator is present at this time.
24. Test Examiners, Proctors, and Monitors are instructed NOT to read a student test. The only exception is for an “oral reading” accommodation.
25. Test Examiner reports any problem with a student test booklet to the School Test Coordinator immediately.
26. Test Examiners, Proctors, and Monitors are instructed NOT to discuss test questions or answers with anyone, including students.
27. Document any verbalized student concern about a test question/answer to the School Test Coordinator who will relay the information to the System Test Coordinator who will contact the GaDOE.
28. Verify that testing procedures are strictly followed.
29. Test Examiner should contact Test Coordinator immediately if any situation arises that might impact test results. STC, with the aid of the System TC, may contact the GaDOE with concerns.
30. School Test Coordinator must contact School Principal immediately if any situation arises that might impact test results.
31. Each day staff will announce to students the test that will be completed that day.
32. All make-up testing will be administered using the same testing procedures as the original testing.

After Testing

33. Test document cleanup must be done in a group setting with the School Test Coordinator.
34. Test Examiners may not cleanup the documents of the students they taught or tested.
35. Testing materials should be collected and verified promptly after each testing session.
36. All testing materials will be stored in secure area until returned to System Test Coordinator.
37. System Test Coordinator will document date and time for departure and arrival from School Test Coordinator to System TC. All materials will be inventoried and signed for by both TCs.
38. Materials will be packaged according to vendor’s instructions and GaDOE timelines.

39. Materials will remain in locked secure storage until pickup by the appropriate carrier.
40. School administrator will sign for student scores to encourage security and confidentiality.
41. Each school has a procedure to distribute test scores to teachers and parents that ensures protection of the individual student based on confidentiality laws.
42. Each school retains all testing rosters, lists, signatures, agendas and training documents.
43. Principal Certification form is completed and maintained by the System Test Coordinator for five years.
44. Superintendent Certification form is completed on January 30 and July 31 in the portal as required by the GaDOE.

*Procedures and Consequences in the event of Irregularities and Invalidations for EOC, EOC,
and GHSWT*

45. Events and circumstances or departures from standardized testing procedures are irregularities. They may have an impact on student performance that is not possible to define or quantify. They are reported and student scores will be flagged to note that conditions under which this score was obtained is different. Use caution when interpreting this score.
46. Test Administrators will report any Irregularity to the School Test Coordinator.
47. The School Test Coordinator sends irregularities to System Test Coordinator for verification and to obtain the correct code.
48. The System Test Coordinator contacts the GaDOE immediately for direction.
49. As instructed by the GaDOE, the System Test Coordinator may be told to investigate and complete the Testing Irregularities Documentation Form provided online on the MyGaDOE Portal. Improperly coded irregularities may default to the holding of those test scores.
50. Examples of Irregularities include materials inappropriately distributed; directions not being followed; improper monitoring of test administration.
51. Other irregularities that affect the student performance and/or the integrity of the test can result in the invalidation of student scores. These can include content being coached, disclosed, cheating, and responses being changed during or after testing by the Test Administrator.
52. Participation Invalidations are for those students who receive an accommodation that is not on the list of state-approved accommodations or not on the student's IEP. When inappropriate accommodations are used, those students' scores may not be used when determining CCRPI calculations.
53. Irregularities specific to the End-of-Course Tests include the System Test Coordinator specifying the form number of the test when entering the information in the Portal. Portal documentation will include if a score should be invalidated or counted as an irregularity. Additionally, the appropriate irregularity or invalidation SDU-B code and corresponding bubble will be used on the paper answer document.
54. Specific Breaches of Professional Ethics per the Professional Standards Commission include the following: gives examinees access to test questions prior to testing; copies, reproduces or uses in any manner inconsistent with test security regulations all or any portion of secure test booklets; coaches examinees during testing, or alters or interferes with examinees' responses in any way; makes answers available to examinees; fails to follow security regulations for distribution and return of secure test materials as directed, or fails to account for all secure test materials before, after or during testing; uses the secure test booklets for any purpose other than examination; participates in, directs, aids, counsels, assists, encourages, or failed to report

any of these prohibited acts. All must be reported immediately to both the System Test Coordinator and Building Principal.

55. All Test Examiners are required to review the Code of Ethics annually with the hierarchy of consequences at <http://gapsc.org>.
56. In the event of an Irregularity, Invalidation or Participation Invalidation, the Examiner will notify the Principal and the School Test Coordinator. The School Test Coordinator will notify the System Test Coordinator. The System Test Coordinator will notify the GaDOE immediately. The System Test Coordinator will request a detailed written statement from all parties involved and follow up with all parties involved if necessary. Final documentation will be entered into the Portal by the System Test Coordinator.

Appendix A: Complaint Procedures

A. Grounds for a Complaint

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

B. Federal Programs for Which Complaints Can Be Filed

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

C. Complaints Originating at the Local Level

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

D. Filing a Complaint

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

- A statement that Bremen City Schools has violated a requirement of a Federal statute or regulation that applies to an applicable program.
- The date on which the violation occurred.
- The facts on which the statement is based and the specific requirement allegedly violated (include citation to the Federal statute or regulation).
- A list of the names and telephone numbers of individuals who can provide additional information.
- Whether a complaint has been filed with any other government agency, and if so, which agency.
- Copies of all applicable documents supporting the complainant’s position.
- The address of the complainant.

The complaint must be addressed to:

Bill Garrett, Federal Programs Director, Bremen City Schools, 501 Pacific Avenue,
Bremen, GA 30110

Once the complaint is received by Bremen City Schools it will be copied and forwarded to the Federal Programs Director.

E. Investigation of Complaint

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

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

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

F. Right of Appeal

If an individual, organization, or agency is aggrieved by the final decision of Bremen City Schools, that individual, organization, or agency has the right to request review of the decision by the Georgia Department of Education. For complaints filed pursuant to Section 9503 (20 U.S.C. 7883, complaint process for participation of private school children), a complainant may appeal to the Georgia Department of Education no later than thirty (30) days from the date on which the complainant receives the Letter of Findings. The appeal must be accompanied by a copy of the Bremen City Schools' decision and include a complete statement of the reasons supporting the appeal.

Bremen City Schools

Complaint Form for Federal Programs under the Elementary and Secondary Education Act

Please Print

Name of (Complainant):	Mailing Address:
Phone Number (Home):	Phone Number (Work):
Person/department complaint is being filed against:	
Date on which violation occurred:	
Statement that the Bremen City School System has violated a requirement of a Federal statute or regulation that applies to an applicable program (include citation to the Federal statute or regulation – attach additional sheets if necessary):	
The facts on which the statement is based and the specific requirement allegedly violated (attach additional sheets if necessary):	
List the names and telephone numbers of individual who can provide additional information.	
Please attach/enclose copies of all applicable documents supporting your position.	
Signature of Complainant:	Date:
Mail or deliver this form to: Bill Garrett, Director of Federal Programs Bremen City Schools 501 Pacific Avenue Bremen, GA 30110	
Date Received:	Date of Response to Claimant: