



**FOOTHILLS**  
REGIONAL HIGH SCHOOL



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## **FY24 Federal Programs Handbook For System and School Administrators**

**Dr. Sherrie Gibney-Sherman, Superintendent**

## About Foothills

Foothills Regional High School is a State Completion High School authorized by the HB87 and approved by the Georgia Department of Education. Foothills is accredited by Cognia. Though Foothills has many sites across the state of Georgia, the GaDOE recognizes Foothills as one LEA and one School. Foothills exercises flexibility with federal funding by participating in consolidation of federal, state and local funding to best serve the unique needs of students seeking a second-chance opportunity to earn a high school diploma.

## Purpose of This Handbook

The purpose of Federal education program funding under the Every Student Succeeds Act (ESSA) is to provide LEAs and their schools with supplemental financial resources and assistance in order to ensure equitable access to a high quality education, regardless of student economic status or other equity factors.

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

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## LEA Monitoring Process and Procedures

The following procedures have been created and designed to provide reasonable assurance regarding the achievement of objectives in the effectiveness and efficiency of operations.

The Georgia Department of Education requires that Foothills Regional High School monitor the implementation of ALL federal programs and the expenditure of all funds associated with each program. The specific requirements are as follows:

- (a) ALL federal programs will conduct self-monitoring of its school/sites and programs sufficient to ensure compliance with requirements, including Title I, Part A (Disadvantaged Children), Title I, Part C (Migrant Education Program), Title I, Part D (Neglected and Delinquent), Title II, Part A (Teacher and Leader Quality), Title III (English Learners & Immigrant Students), Title IV, Part A (Student Support and Academic Enrichment), Title X, Part C (McKinney-Vento Education for Homeless), the Elementary and Secondary School Emergency Relief (ESSER) Act, which includes Coronavirus Aid, Relief, and Economic Security (CARES) Act, Coronavirus Response and Relief Supplemental Appropriations (CRRSA) Act, and the American Rescue Plan (ARP) Act.
- (b) Federal program coordinators will undergo training from GaDOE and other sources to maintain proficiency in program compliance requirements.
- (c) Federal program coordinators will provide technical assistance to Foothills sites.
- (d) Federal Program Specialist self-monitoring will include monitoring all program expenditures to verify that all expenditures comply with program requirements.
- (e) Federal program coordinators will maintain all documentation the LEA may need for future auditing/monitoring.
- (f) In years when LEA does not receive an on-site visit, federal program coordinators will complete the Self-Assessment Checklist and submit it to the Georgia Department of Education (GaDOE) as requested.
- (g) LEA will undergo monitoring by GaDOE on a published cycle. LEA federal program coordinators will participate in training and technical assistance updates as provided by GaDOE prior to monitoring visits.
- (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 federal programs. If a Corrective Action Plan is required, the LEA Federal Program Specialist will respond in a timely manner with a Corrective Action Plan, which must be approved by GaDOE. The appropriate GaDOE Program Specialist will monitor implementation of the Corrective Action Plan.

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

- Monitoring of Expenditures – Local educational agencies (LEAs) must submit for approval an annual budget through the Consolidated Application process. GaDOE Program Specialists review each application and budget to ensure that expenditures are appropriate for the program area before approving LEA budgets. Foothills currently consolidates most of their Federal program funding with state and local funds and submits their budget accordingly. Once budgets are approved, GaDOE Education Program Specialists track how well LEAs are requesting funds for expenditures to ensure that LEAs are likely to meet the expenditure requirements for each federal program.
- Single Audit – LEAs with single audit findings are flagged for technical assistance.
- On-site Monitoring – A GaDOE on-site Cross-Functional Monitoring Team visits the school system to apply the criteria included in a GaDOE cross functional monitoring document.
- 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) as requested.

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

- Selection of LEAs to be monitored.
  - o LEAs are currently cross functionally monitored on a five-year cycle with Foothills Regional High School starting in 2024.
  - o LEAs were initially randomly selected from each of Georgia's service areas.
  - o LEAs with audit or monitoring findings requiring a return of monies or receiving a high number of stakeholder complaints are monitored within the year of the LEA audit or monitoring report and the written complaint. In addition, on-site monitoring outside of the scheduled cycle may be arranged as needed if an LEA evidences serious or chronic compliance problems.

Monitoring is an essential component of ensuring that all facets of all federal programs are being implemented as prescribed by the Every Student Succeeds Act (ESSA) under the Elementary and Secondary Act (ESEA) and the Elementary and Secondary School Emergency Relief Act (ESSER). It is a process of systematically providing technical assistance and collecting data in order to provide information that can guide program implementation.



Each federal program at Foothills Regional High School makes use of monitoring as a means of regular observation and recording of activities taking place in the LEA. Critical to this process is the feedback provided that can assist in improving student academic achievement. District monitoring addresses the following:

- Ensuring that all activities are carried out in accordance with federal compliance guidelines.
- Monitoring inventory and equipment usage if purchased with federal funds - n/a if purchased with consolidated funds.
- Attainment of academic achievement school and site improvement goals.
- Compliance with budgetary guidelines as defined by consolidation of funds.

### **Positions Responsible for Implementation and Monitoring of Procedures**

The Federal Programs Specialist will provide support to the coordinators for each federal program. The coordinator for each federal program will develop and implement the monitoring procedures contained in this handbook.

### **Frequency of Monitoring (Timeline)**

- June-November - Provide technical assistance sessions for staff using guidance provided by the GaDOE, to include updates on any new guidelines around any federal programs implemented at Foothills. Sessions will include the following topics: budgets, funds consolidation, ordering, compliance, parental involvement, professional learning, meeting the needs of students, schoolwide programs, monitoring, academic achievement, inventory, scheduling, ethics, fraud and waste, and complaint procedures. Sessions will include representation from the following programs: Title I, Part A (Disadvantaged Students), Title I, Part C (Migrant Education Program), Title II, Part A (Teacher and Leader Quality), Title III (English Learners & Immigrant Students), Title IV, Part A (Student Support and Academic Enrichment), Title IX, Part A (McKinney-Vento Education for Homeless Children and Youth) and the Elementary and Secondary School Emergency Relief (ESSER) Act, which includes Coronavirus Aid, Relief, and Economic Security (CARES) Act, Coronavirus Response and Relief Supplemental Appropriations (CRRSA) Act, and the American Rescue Plan (ARP) Act.
- March-August - Work with staff on annual revision of compacts and school improvement and family engagement plans and budgets. All federal program coordinators will review plans and budgets to ensure that funds are being spent according to plans, that plans have all the necessary components, and that plans, and budget align with the Intent and Purpose statement for each federal program.
- July to June (On-going) –
  - o Meet quarterly with regional staff. Provide additional training as needed.
  - o Inventory items if purchased with federal funds - n/a if purchased with consolidated funds.
  - o All federal programs are monitored by the appropriate program coordinator. Ongoing review of school and site improvement data and plans in conjunction with Superintendent, Regional Directors and Site Directors.
  - o Federal & Special Programs department will provide technical assistance through the Tuesday updates and meet with Site Directors when needed.
  - o Quarterly Site/School Improvement Meetings (SIP) at each site to review site goals and data as they relate to the school goals. Meetings will be facilitated by the School Improvement Facilitators funded through the School Improvement Grant.
  - o Site Improvement Plan (SIP) Team members consist of one Regional Personnel (Dept. Directors, Specialist and/or Area Coordinators), Site Directors, Assistant Site Directors, Special Ed Lead, Student Services Representative, Counselor, Site Improvement Facilitator(s), Content Specialist, and Student Services Coordinator.
- Ongoing - Budgets are reviewed at least quarterly to ensure purchases are in line with the Intent and Purpose statement for each program and are supporting strategies contained in the system and/or site improvement plans.
- February/March/April – Conduct annual and on-going comprehensive needs assessment. Data is provided to system leaders and staff as well as parents in order to determine prioritized needs for the following year.
- July - Superintendent and Board host Annual Strategic Planning Meetings with appropriate stakeholders to compile and prioritize data from needs assessment. With both stakeholder and Board review, the strategic plan is reviewed, and district/schoolwide and site-based action plans are revised as appropriate and needed.

### **List of Documentation to Verify Monitoring of Title Programs**

Federal Program coordinators will document quarterly meetings with site leaders using sign-in sheets, checklists, and agendas. Regular communication will occur to review required documents and offer technical assistance. All documents, data are updated monthly in the Google Drive for Faculty/SIP/PLC Meetings.

### **Needed Corrective Actions at Sites (Identified by LEA)**

If corrective actions are found during the monitoring process, they will be addressed by site leaders as a result of technical assistance provided by the federal program department and other regional leaders. Professional learning is provided based on need. In addition, professional learning is used as a preventive measure to ensure that all personnel have a clear understanding of all expectations for every facet of the various federal programs. Federal program department, along with other regional level staff and outside consultants, provide ongoing training as a means of ensuring that the system and sites are in compliance at all times. A reasonable timeline for addressing corrective actions will be agreed upon by site and regional leaders and adhered to by all parties. Foothills staff attend annual DOE hosted conferences to learn about federal requirements and strategies for implementation (Homeless, Alternative School, IDEA, Title I, ESOL, School Improvement, etc)

### **Verification of Corrective Actions at Sites**

Corrective actions, findings, areas of concern, and recommendations received through monitoring feedback are discussed with site directors in order to assist in understanding the critical need for compliance with federal guidelines. Verification of corrective actions will be determined through ongoing technical assistance provided to the site and documented appropriately by meeting agendas and sign-ins.

### **District Review of Applicable Federal Program Budgets**

Each federal fund program prepares an Intent and Purpose statement for the applicable federal budget. A combined, consolidated budget of federal, local and state funds is created by Foothills Regional High School. Expenditures must align with actions within the District/Schoolwide Plan for Foothills and align to the Intent and Purpose statement. Monthly, the Federal Program Specialist and Business Operations staff review expenditures for monthly drawdowns. Quarterly, the Federal Program Specialist meets with Business Operations staff to review budgets and expenditures to ensure expenditures are aligned to the Intent and Purpose statements of each federal program. Completion reports are annual reports required by Georgia Department of Education (GaDOE) for all grant funds. Reports are due thirty days after the end date for each grant. Prior to preparing the completion report, the general ledger report for each grant will be reviewed to ensure that all expenditure postings are correctly recorded as required under consolidation of funding.

### **Identification of High-Risk Schools**

Foothills Regional High School is one LEA and one school. Annual reports from the Accountability Department of the GaDOE will be utilized to determine if Foothills is considered high risk as determined by CSI or TSI lists. Foothills Regional High School has been identified as a CSI school due to low graduation rates.

### **IDEA Procedures for Monitoring Schools and Programs**

#### **Multi-Tiered Systems of Support Program**

Foothills Regional High School provides a platform that functions atypical to that of traditional high schools in the manner in which our Primary and Secondary Level of Prevention is implemented. Students who enroll in Foothills have not experienced the desired success in a traditional setting for a number of reasons. Our program intends that every student receives the support needed to be successful in school and life. When students receive the necessary assistance, they are more likely to be supported, challenged, and engaged in taking ownership of their own academic success. The very nature of Foothills lends itself to higher level support from the onset. However, as in any system, as a student enters and begins to experience “the Foothills way” there are opportunities to adjust the level and intensity of interventions to meet the unique needs of students who are ever-changing based on their lived experiences and circumstances. Since MTSS focuses on creating systemic conditions of support, ensuring that the educational environment allows students to succeed, the “baseline” of support at Foothills, given its unique model, must be considered and the MTSS structure will look different than that of other traditional schools.

For all intents and purposes, Foothills functions as a Tier 2 school and strategies are embedded into the fabric of the model and offered universally to all students upon enrollment. In traditional schools, Tier 2 supports are targeted and additional interventions delivered to students who are not responding to Tier 1 supports. At Foothills, 100% of students are offered what would be considered typical Tier 2 supports. All students at Foothills participate in a standards-based classroom environment. Teachers use differentiation and positive behavior to foster an empowering and positive school climate. MTSS implementation of a tiered approach at Foothills Regional High School provides an opportunity to develop and implement innovative strategies which stimulate learning and embrace engagement.

The site MTSS Facilitator will review the student's historical educational records (i.e. SLDS, obtained school reports for prior SST documents) and consults the site Special Education Coordinator for a review of GOIEP to determine if the student was ever considered for special education services. The site MTSS Facilitator compares the student's educational records against the Universal screening criteria to determine the support level (Tier 1 (2), Tier 3). The site MTSS Facilitator will inform the Regional Registrar to remove the MTSS flag if a student only needs Tier 1(2) support, and no Tier 3/SST meeting has been held during the school year.

A full description of the MTSS Foothills process can be found in the MTSS Handbook. [MTSS Handbook](#)

The Regional MTSS Coordinator and site level MTSS facilitators conduct random MTSS file review throughout the school year to monitor plans for implementation and student progress. All administrators at the site level are expected to be an integral part of the MTSS process and remain actively involved with all aspects of the process including professional learning, monitoring meetings, implementation of research-based practices, etc. Ongoing technical assistance and support from the Regional MTSS Coordinator is provided through professional learning and/or one-on one assistance by the site level MTSS facilitator to ensure students are receiving services needed.

### **Child Find**

As an LEA, Foothills has Child Find responsibility for enrolled students. To meet this responsibility, information on Child Find is disseminated using the system website. The Regional Director for Special Education and the Regional Director for Student Services conducts annual training on Child Find procedures. Site registrars are updated annually on referral procedures to include directions for accepting requests for an evaluation outside of the MTSS process. Each site conducts monthly meetings to review new referrals and follow-up on past referrals. These meetings are led by a student services representative with a site administrator in attendance. The local MTSS Coordinator and Student Support Team will use Response to Intervention Tiers to aid in Child Find.

The special education coordinators provide professional learning on Child Find procedures at monthly department meetings to all special education staff members. Ongoing professional learning is provided at the site level to all staff by the student services staff. Sustained supervision and monitoring of compliant practices for Child Find is provided by the regional special education staff and student services staff. If Child Find procedures are blatantly not followed, additional training and technical assistance is provided by the Regional Director for Special Education and/or the Regional Director for Student Services.

### **Evaluation/Re-evaluation**

The Regional Director for Special Education consistently monitors the evaluation and reevaluation process. All testing referrals for special education are discussed with the Regional Director for Special Education, school psychologist and special education coordinators. The regional special education staff consults with the Regional Director for Special Education and monitors the referral process to ensure the 60-day timeline is met. Once a determination of eligibility is made, the regional special education staff works with the IEP Team to develop and implement an IEP. The regional special education staff and site level staff monitor the GOIEP dashboard for adherence to timelines and eligibility dates. If concerns arise, the regional special education staff consults with the Regional Director for Special Education to develop a plan to ensure compliance and provide technical assistance.

Teachers who require technical assistance with policies and procedures regarding evaluation and reevaluation are provided one-to-one conferences, webinars, trainings and/or professional learning plans from the Regional Director for Special Education, regional special education coordinators, and/or designated site level staff (e.g. site directors, lead special education teachers, etc.). If a teacher continues to have difficulty despite the technical assistance he/she receives, site-level administrators will be notified so they may determine next steps to ensure compliance. All staff are paid for completing any required training.

### **Discipline**

The Regional Director of Operations monitors regional individual site compliance with discipline policy and procedures by reviewing the associated data and their trends. The Regional Director of Special Education collaborates with the Regional Director of Operations, as well as other regional leaders, by reviewing discipline data and their trends for students with disabilities. If concerns arise, the Regional Director of Special Education and Regional Director of Operations will meet with the site-level administration to provide technical assistance. Also, site-level administrators monitor teacher compliance regarding discipline. Individualized Education Plans (IEPs), Functional Behavior Analysis (FBAs), Behavior

Intervention Plans (BIP), and Manifestation Determination Reviews (MDRs) are monitored by the Regional Director of Special Education, regional special education coordinators by way of classroom observations, intermittent IEP and MDR meeting attendance, as well as random inspections of IEPs, FBAs, BIPs and MDRs.

Teachers who require additional technical assistance with policies and procedures regarding discipline will be provided technical assistance and support through training, one-to-one conferences, webinars and/or professional learning plans from the Regional Director of Special Education, regional special education coordinators, and/or site directors. If a teacher continues to have difficulty despite the technical assistance, site directors will be notified so they may determine next steps to ensure compliance.

#### **Procedures for Monitoring EL entrance/exit processes.**

Procedures for monitoring EL entrance and exit process can be found in the Title III, ESOL section of this manual.

#### **Procedures for Monitoring Intent and Purpose**

After the annual needs assessment has been conducted and the District/Schoolwide Plan has been revised (with stakeholder and Board review and input), an Intent and Purpose statement for each applicable federal program is created. The Intent and Purpose statement is reviewed by the Federal Programs Specialist to ensure alignment to the Strategic and District/Schoolwide plans. Because the majority of our federal funds are consolidated, Intent and Purpose statements are broad in nature to provide the most flexibility possible. Site Directors develop individual site plans that align to the Strategic and District/Schoolwide plans. Quarterly Regional Personnel (Dept. Directors, Specialist and/or Area Coordinators), Site Directors, Assistant Site Directors, Special Ed Lead, Student Services Representative, Counselor, Site Improvement Facilitator(s), Content Specialist (four core), and Student Services Coordinator meet for the SIP meeting at each site to ensure site plans are implemented with fidelity. Quarterly, the Federal Program Specialist meets with Business Operations staff to review budgets and expenditures to ensure there are expenditures which align to the Intent and Purpose statement for each federal program.

## **Consolidated LEA Improvement Plan**

#### **Procedures for Creation, Review, and Approval**

Foothills Regional High School annually completes the Streamlined Comprehensive LEA Improvement Plan (S-CLIP) in the Statewide Longitudinal Data System (SLDS). Foothills is committed to cultivating and sustaining partnerships with parents and community stakeholders, and encourages their participation in the development, implementation, review and evaluation of its S-CLIP and all of the components therein. All Foothills parents are provided multiple opportunities to be involved in the development and revision of the system's S-CLIP. These opportunities include access to and the opportunity to provide feedback on the components on the school website and during family engagement meetings, including spring site-based Title planning meetings. As well as input at the quarterly Family Advisory Council meetings.

To ensure stakeholder input and timely submission to the GaDOE, the following timeline will be followed to create, review, and seek approval of the S-CLIP:

- August through July - The newly approved S-CLIP is made available on the school website.
- September-December – The current S-CLIP will be shared, and feedback sought during a regional Family Advisory Council meeting.
- February-April – The current S-CLIP will be made available during site-based Title Spring Planning Meetings and opportunities for feedback sought. Survey responses will be collected as part of the annual Comprehensive Needs Assessment. Surveys are administered to administrators, teachers, parents, and students.
- March - Governance Team/Board members will have the opportunity to provide feedback for the following year's S-CLIP.
- March-June – Changes are made to the S-CLIP based on feedback obtained from multiple means and stakeholders.
- May/June: The S-CLIP is uploaded for GaDOE approval and changes made as requested until the plan is approved.

#### **Resolution for Unapproved CLIP**

If the GaDOE requests revisions to any portion of the S-CLIP (S-CLIP Questions, Family and Parent Engagement Policy, Equity Action Plan, Foster Care Transportation Plan, and/or Title I, Part C, ID&R Plan), the Federal Programs Specialist will

retrieve the requested changes from the Audit Trail in the SLDS portal. The Federal Programs Specialist will then communicate with the appropriate personnel to ensure that requested changes are completed. If the request is significant, an additional meeting will be called for input. The Federal Programs Specialist will provide technical assistance as appropriate, make corrections and/or approve corrections to the appropriate S-CLIP components and then re-submit the plan. This process is continued until the plan has been approved by GaDOE. The updated changes will be uploaded to the website with feedback opportunities.

#### **Selection of Evidenced-Based Action Steps in the S-CLIP**

Foothills Regional High School consolidates federal, state and local funds. While action steps identified during the strategic planning process are often evidence-based, Foothills is not required to provide procedures and/or documentation of this best practice.

## **District/Schoolwide Improvement Plan**

#### **Creating, Reviewing, and Approving a District/Schoolwide Plan**

Foothills Regional High School is both a LEA and a school. Annually, Foothills engages required stakeholders in planning for continuous improvement. All faculty, staff, and parents are surveyed to inform the district/schoolwide plan. Foothills also seeks input from the Board. The Superintendent hosts an annual strategic planning meeting where regional and site leaders work collaboratively to review all data collected during the comprehensive needs assessment, prioritize needs and revise the district/schoolwide plan to address identified prioritized needs around the five areas of continuous improvement. Each site also creates a site improvement plan that specifically addresses the unique needs of their site that aligns to both the regional strategic plan and the district/schoolwide plan. Site plans focus on site specific goals and needs identified through the comprehensive needs assessment.

#### **Selection of Evidenced-Based Action Steps**

Foothills Regional High School consolidates federal, state and local funds. While action steps identified during the strategic planning process and included in the district/schoolwide plan are often evidence-based, Foothills is not required to provide procedures and/or documentation of this best practice.

#### **Resolution for Unapproved District/Schoolwide Plans**

The district/schoolwide plan is submitted in the GaDOE portal on the Consolidated tab annually. All Federal Programs Specialists at the GaDOE have the opportunity to review the district/schoolwide plan and Intent and Purpose for each federal program. If the district/schoolwide plan is not approved or revisions are requested, the Federal Programs Specialist will seek input from appropriate staff, revise the plan and re-submit. The process will be followed until the district/schoolwide plan is approved and accepted.

## **Private Schools**

Foothills Regional High School is a State Specialty School with a regional attendance zone. Private school consultation and participation is not required of State Specialty Schools with regional attendance zones.

## **Fiduciary Responsibility**

#### **Maintenance of Effort for ESSA and IDEA**

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. The calculation in the GaDOE portal determines which funds should be excluded from the calculation. Documentation for MOE is only required for districts that do not meet the required maintenance of effort. Program Coordinators will pull the MOE information from the Consolidated Application each school year for documentation purposes.

### **Comparability**

Foothills Regional High School is one school - one grade band. Comparability is not applicable for Foothills. The Federal Program Specialist annually completes the Comparability of Services utility in the GaDOE portal, indicating that comparability is not applicable.

### **Assessment Security and Reporting of Accountability**

Foothills Regional High School takes the ethical responsibility to provide secure and appropriate testing environments for its students very seriously. In any state or federally mandated assessment, Foothills expects its employees to act in accordance with specific guidelines mandated by the assessment and the general guidelines of the Georgia Department of Education. For every administration of a state-mandated assessment, the following guidelines will be followed.

- The Regional Testing Coordinator will stay current on appropriate testing rules and practice by viewing required DOE training activities and reading all manuals and memorandums associated with state assessments.
- All site test coordinators will participate in appropriate training activities specified by the regional test coordinator prior to participation in the administration of state-mandated assessments.
- Site test coordinators will in turn ensure that any other individuals participating in administration of state-mandated assessments at their site have received appropriate training as specified by the regional test coordinator.
- Records of participation in these training activities will be maintained in a centralized location for a minimum of five years.
- Training at every level will include a segment covering testing ethics and ethical behavior related to the administration of state-mandated assessments.
- Test materials, when on site, will be continuously maintained in a secured and locked location with access limited to only those who are functioning as site test coordinators.
- Campuses will be quiet and organized on the day(s) of testing.
- Any irregularity or anomalous event taking place at a site during testing will be promptly and fully reported to the regional test coordinator.
- Irregularities involving possibly illegal or unethical actions on the part of an employee will be reported to the Georgia Professional Standards Commission.
- If the anomaly rises to the level of a possible irregularity, it will be promptly reported to the Georgia Department of Education.
- When test results are returned, they will be disseminated to students and parents within a reasonable time frame as dictated by receipt of results from vendors.
- The school report card is provided for public access on the Foothills website at:  
<https://foothillscharter.ss10.sharpschool.com/cms/one.aspx?portalId=94737&pageId=26283120>

### **Consequences for Violations Related to Assessment Security**

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

## **Internal Controls**

### **Code of Federal Regulations**

Foothills Regional High School operates their federal grants in accordance with the [Code of Federal Regulations](#).

### **Allowability of Costs (2 CFR 200.302(b)(7))**

Any purchases made with federal funds that are not consolidated with state and local funds must follow the guidelines for allowable costs. Foothills Regional High School Office of Federal Programs will follow guidelines as detailed in the Uniformed Grant Guidance (2 CFR, Part 3474 and 2 CFR, Part 200), and applicable memos, letters, handbooks, and/or communication regarding allowable/unallowable purchases provided by the Georgia Department of Education. Foothills Regional High School considers these factors when making an allowability determination:

- Necessary
- Reasonable
- Allocable

All questionable expenses will proceed to the GaDOE Area Program Specialist for that program for further clarification via the Foothills Federal Programs department.

Federal funds cannot be used to purchase incentives for students, teachers, or to entice participation in professional learning activities. Food for parent involvement activities must be considered “light refreshments.” Light refreshments have been defined as donuts, fruit, muffins, juice, coffee, chips, pretzels, popcorn, raw vegetables and dip, nuts, cookies, brownies, punch, soda, and water. Light refreshments do not include pizza, sandwiches, or anything that could be considered any part of a meal. Federal funds can only be expended for events that “build capacity.” Thus, it would be allowable to fund a snack for a workshop teaching parents a specific skill but would not be allowable to provide snacks to parents volunteering. Foothills does use state dollars to feed students and families and purchase gas cards, meal cards and school supplies (never open gift cards that would be considered the same as cash).

### **Financial Management ~ Authorization of Expenditures and Prior Approval of Purchases**

The following procedures must be followed to ensure the proper handling of federal funds:

1. Each budget is reviewed, revised as necessary, and approved by the appropriate program coordinator. Once necessary changes have been made and the budget is submitted and approved by the GaDOE, requisitions can be entered into the financial software.
2. Requisitions in the financial software must include:
  - Complete vendor information including phone number (and fax number if applicable).
  - Ship to information, including appropriate address.
  - Appropriate account number assigned by the Regional Purchasing Clerk.
  - Sufficient detail to determine if each cost item is allocable, reasonable, and necessary.
  - If a requisition is over \$15,000, three quotes must be obtained and attached to the requisition documentation.
  - If the requisition is over \$100,000, a competitive bid process and posting on the Georgia Procurement website will be required and must be reported to the Governance Board by the Regional Director for Finance and HR.
  - No purchase or contract shall be divided into parts for the purpose of avoiding the above requirements. Requisitions will be reviewed by the appropriate federal program approvers.
3. The Purchasing Clerk will send a copy of the purchase order to the appropriate federal programs approver so they can make sure the purchase is included in the Schoolwide/School Improvement Plan/Equity Plan and that the expense is allocable, allowable, reasonable, and necessary.
4. If approved, the program coordinator then signs off on the purchase via email to the Purchasing Clerk.
5. If rejected, a reason is documented in the email to the Purchasing Clerk.
6. The Regional Director for Finance and HR issues final approval and the financial software automatically sends the approved purchase order to the originator of the requisition/purchase order to place the order.
7. When the ordered item arrives, the site or department compares what is received with what was ordered and alerts accounts payable that this order is ready to be paid. Any disputes are reconciled between the office manager or accounts payable bookkeeper and the vendor.

### **Invoices**

The following are procedures for invoices:

- Receipt of Invoice: Invoice is received by the office manager and forwarded to the accounts payable clerk.
- As stated above, the purchase order originator will match the order as he or she receives it with the purchase order and will alert the AP clerk when it is ready to be paid. The purchase order cannot be paid unless the item is received.
- The Accounts Payable Clerk compares vendor invoices to purchase orders. If these items match, the invoice is entered as an accounts payable. If not, the Accounts Payable Clerk alerts the appropriate purchaser, and they work together with them to determine a solution.

### **Payment of Invoice**

The following procedures are for payment of invoices:

- The Accounts Payable Clerk charges the expenditures to the proper fund/program designated on the purchase order in the system financial software.

- If invoices received are charged to a federal program that exceed the amount of purchase orders, the Accounts Payable Clerk alerts the purchaser and federal programs specialist who work together to determine a solution.
- Open purchase order reports are provided by Accounts Payable to the federal programs upon request to determine if goods or services have in fact been received but not invoiced by the vendor. Contact is made with the vendor to secure an invoice if such instances are noted.

### **Segregation of Duties (2 CFR 200.303(a))**

Foothills Regional High School requires the following segregation of duties associated with cash management to ensure internal controls and to prevent errors and fraud.

### **Regional Director for Finance and Human Resources**

Under the supervision of the Superintendent, the Regional Director for Finance and Human Resources will carry out the following duties:

- Prepare monthly and annual financial statements for inspection and approval by the Governance Team.
- Establish accounting procedures to ensure that proper internal controls are maintained for the regional business office.
- Manage cash flow and investment of available funds.
- Assist the Superintendent in preparation of financial data for the state allotments and other financial areas.
- Open all bank accounts and reviews prior to reconciliation. Approves reconciliations of other staff members.
- Oversees the reconciliation of all accounts.
- Supervise operation of the business office to include payables and payroll.
- Compile annual budget for board approval and submit it to the Georgia Department of Education.
- Coordinate accounting procedures to ensure that regional office and local site administrators follow proper procedures in the budgeting, record keeping, and expending of program funds for which they are responsible.
- Oversee, approve and post monthly and year-end adjustments, run and balance reports.
- Oversee and assist with the preparation and submission of year end and interim financial reports to the Georgia Department of Education.
- Ensures a yearly audit is completed and submitted to the Department of Education.
- Compile data for audit, work with auditor during audit, and prepare MD&A for audit report.
- Perform other duties as assigned by the Superintendent.

### **Business Operations Manager and Business Manager**

Under the supervision of the Regional Director for Finance and Human Resources, the Business Operations Manager and Business Manager will carry out the following duties:

- Assist in the implementation of accounting procedures by maintaining accurate records and internal controls throughout the system and ensuring compliance with all applicable regulatory requirements.
- Perform journal entries, budget adjustments, and bank reconciliations.
- Assist in the budget process and enters the budget into the financial software.
- Close books at month and year end.
- Prepare and submit year end and interim financial reports to the Georgia Department of Education.
- Compile data for audit, work with auditors during audit,
- Assist the Regional Director for Finance and HR with account analysis, report preparation and distribution, and month-end /year-end closeout procedures.
- Maintain a wide variety of financial records to ensure compliance and the availability of documentation.
- Perform payroll accruals and reversals.
- Oversees internal audits.
- Oversee and consult on any liability insurance issues.
- Prepare year-end reporting, including W-2's and 1099's.
- Prepare quarterly tax reporting.
- Assist with any duties required for annual audit preparation.
- Perform other related duties as assigned by the Regional Director for Finance and HR.

### **Payroll Clerk**

Under the supervision of the Regional Director for Finance and Human Resources, the Payroll Clerk will carry out the following duties:

- Process monthly payroll and reporting for all system employees.
- Invoice for any payroll reimbursements.
- Prepare year-end reporting, including W-2's and 1099's.
- Calculate sick leave for retirement.



- Assist with budget preparation.
- Calculate salary adjustments.
- Records Management
- Compile data for audit, work with auditors during audit,
- Perform other duties as assigned by the Regional Director for Finance and HR.

### **Accounts Payable Clerk**

Under the supervision of the Regional Director for Finance and HR, the Accounts Payable Clerk will carry out the following duties:

- Balance travel reports monthly.
- Prepare invoices.
- Prepare year-end reporting, including assisting with 1099's
- Pay invoices as they become due.
- Monitor open purchase orders for completeness.
- Compile data for audit, work with auditors during audit,
- Perform other duties as assigned by the Regional Director for Finance and HR.

### **Federal Programs Specialist -**

Under the direction of the Regional Director for Instruction the Federal Programs Specialist will carry out the following duties:

- Coordinate, monitor, and provide technical assistance to sites for all federally funded programs.
- Monitor purchases to ensure that expenditures are allocable, reasonable, and necessary. Ensuring all system policies for purchasing, expending funds, and inventorying equipment are followed to avoid fraud, waste, abuse, and corruption. No items will be purchased without prior approval, and all items purchased must be a part of the approved budget.
- Approve each purchase requisition/order, travel expense statement and professional learning (PL) leave that is funded through federal funds. Meet with the Regional Director for Finance and HR, System Clerks, Payroll Specialist and Accounts Payable Clerk, as needed and request financial reports to ensure alignment and balance on at least a quarterly basis. Meet with and/or email site directors or designees to ensure accuracy of budgets.
- Ensure system and site inventories for items purchased with federal (not consolidated) funds are maintained electronically and kept up to date.
- Ensure each employee is trained on his/her responsibility regarding fraud and the channels to report it if suspected annually.
- Collaborate with appropriate personnel to ensure the intent and purpose of each federal program is being met under consolidation of funds.

### **Director of Special Education**

Under the supervision of the Superintendent, the Director of Special Education will carry out the following duties related to IDEA and CEIS

- Maintains accurate records and internal controls (e.g., ledgers) ensuring compliance with all applicable regulatory requirements and accuracy of fund balances (object codes).
- Reviews detail and summary reports for potential budget variances and ensures fund balances are accurate.
- Maintains a wide variety of financial records to ensure compliance and the availability of documentation.
- Approves purchase requisitions, travel expense statements, and registration payments for compliance and accuracy.
- Manages Consolidated Application budgets.
- Assists with database activities related to the financial system.
- Ensures the special education inventory is accurate.
- Assists auditors by providing supporting documentation and/or information on internal processes (including financial documents, professional learning documentation, equipment inventory, and all IDEA monitoring documents).
- Collaborate with coordinators from all federal programs to ensure the intent and purpose of each federal program is being met under consolidation of funds.

### **Procurement (2 CFR 200.319(c))**

Micro-purchases, those less than \$15,000, shall be made with effort to provide the least expense to the school. Purchases shall be based on one or more oral quotes, when possible, to determine best price. Services, supplies or equipment estimated to cost over \$15,000 will require three written quotes or website references. All services, supplies or equipment estimated to cost over \$100,000 must use a bid or Request for proposal and will be posted on the school website and the

Georgia Procurement website. Evidence of the Bid or RFP must be attached to the purchase order/requisition in the financial software program. If purchases are made through RESA, compliance with the above procedures are not required.

Competitive proposals or bids one hundred thousand dollars (\$100,000) or greater shall be approved by the Governance Team, if the low bid is not recommended the Regional Director for Finance and HR will provide an explanation of why. In compliance with Section 2 CFR 200.319, any purchases in excess of \$100,000 including contract modifications will require a cost or price analysis, sealed bids, and/or competitive proposals. Cost analysis means evaluating the separate cost elements that make up the total price, including profit. Price analysis generally means evaluating the total price.

Sole source bids may be used only when one or more of the following circumstances apply:

1. The item is available only from a single source.
2. The public emergency for the requirement will not permit a delay resulting from competitive bidding.
3. The federal awarding agency or pass-through entity expressly authorizes noncompetitive proposals in response to written requirements from non-federal entities.
4. After soliciting a number of sources, competition is determined inadequate.

No purchase or contract shall be divided into parts for the purpose of avoiding the competitive bid process.

The Regional Business Manager checks Georgia's System for Award Management (SAM) website, <https://www.sam.gov/portal/SAM/> prior to approving any purchase equal to or in excess of \$25,000 to ensure the vendor is not on the list of suspension and debarment. A screenshot of the search results will be filed with the vendor documents. A copy will be attached with the PO as needed.

#### **Technical Evaluations of Competitive Proposals and Selecting Recipients (2 CFR 200.320(d)(3))**

Foothills Regional High School shall ensure that the process of procuring goods and services is fair and equitable by taking the following measures:

- Incorporating a clear and accurate description of the technical requirements for the material, product, or service to be procured. The description must not, in competitive procurements, contain features which unduly restrict competition. The description may include a statement of the qualitative nature of the material, product or service to be procured and, when necessary, must set forth those minimum essential characteristics and standards to which it must conform if it is to satisfy its intended use.
- Avoid providing detailed product specifications.
- When it is impractical or uneconomical to make a clear and accurate description of the technical requirements, a "brand name or equivalent" description will be used as a means to define the performance or other salient requirements of procurement. The specific features of the named brand which must be met by offers will be clearly stated.
- Identify all requirements which the offers must fulfill and all other factors to be used in evaluating bids or proposals.
- Ensure that all prequalified lists of persons, firms, or products which are used in acquiring goods and services are current and include enough qualified sources to ensure maximum open and free competition. Also, the school system will not preclude potential bidders from qualifying during the solicitation period.

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

Contracts binding the school district can be made only by the Governance Board, the Superintendent or approved agent.

#### **Conflict of Interest (2 CFR 200.318(c))**

Employees of Foothills Regional High School who are engaged in the selection, award and administration of contracts shall abide by the following:

- No employee, officer, or agent may participate in the selection, award, or administration of a contract supported by a federal award if he or she has a real or apparent conflict of interest.

- Such a conflict of interest would arise when the employee, officer, or agent, any member of his or her immediate family, his or her partner, or an organization which employs or is about to employ any of the parties indicated herein, has a financial or other interest in or a tangible personal benefit from a firm considered for a contract.
- Officers, employees, and agents of Foothills Regional High School may neither solicit nor accept gratuities, favors, or anything of monetary value from contractors or parties to subcontracts.
- Violation of these standards will result in reporting of said personnel to the Superintendent of Schools and if appropriate, local authorities. Any misconduct could result in suspension, loss of employment, and any other consequences that are applicable by law.
- Any violation of these procedures must be disclosed in writing, in a timely manner. All suspected violations of federal criminal law, arrests, and/or convictions involving fraud, bribery, or gratuity violations potentially affecting the federal award must be reported as failure to make disclosures can result in remedies for noncompliance, including suspension and debarment.

## **Board Member Conflict of Interest, Policy BHA**

### **Financial Governance:**

1. No Board member shall use or attempt to use his or her official position to secure unwarranted privileges, advantages, employment for himself or herself, and of his or her immediate family members, or others.
2. No Board member shall act in his or her official capacity in any matter in which he or she, or any of his or her immediate family members, or any business organization in which he or she has a material financial interest, that would reasonably be expected to impair his or her objectivity or independence of judgment. Compliance with Code Section 20-2-505 shall not constitute a violation of this paragraph.

No Board member shall solicit or accept or knowingly allow any of his or her immediate family members or any business organization in which he or she has an interest to solicit or accept any gift, favor, loan, political contribution, service, promise of future employment, or other things of value based upon an understanding that the gift, favor, loan, contribution, service, promise or other things of value was given or offered for the purpose of influencing that board member in the discharge of his or her official duties. This paragraph shall not apply to the solicitation or acceptance of contributions to the campaign of an announced candidate for elective public office.

1. If the board member has no knowledge or reason to believe that the campaign contribution, if accepted, was given with the intent to influence the board member in the discharge of his or her official duties. For the purposes of this paragraph, a gift, favor, loan, contribution, service, promise, or other thing of value shall not include the items contained in sub-paragraphs (a) (2) (A) through (a) (2) (J) of Code Section 16-10-2.
2. No Board member shall use, or knowingly allow to be used, his or her official position or any information not generally available to the members of the public which he or she receives or acquires in the course of and by reason of his or her official position for the purpose of securing financial gain for himself or herself, any of his or her immediate family members, or any business organization with which he or she is associated.
3. No Board member or any of his or her immediate family members or business organization in which he or she has interest shall represent any person or party other than the local board or local school system in connection with any cause, proceeding, application, or other matter pending before the board in which he or she serves on or any proceeding involving the local school system in which he or she serves.
4. No Board member shall be prohibited from making an inquiry for information on behalf of a constituent if no fee, reward, or other thing of value is promised to, given to, or accepted by the board member or any of his or her immediate family members in return, therefore.
5. No Board member shall be deemed in conflict with these provisions if, by reason of his or her participation in any matter required to be voted upon by the board, no material or monetary gain accrues to him or her as a member of any profession, occupation or group to any greater extent than any gain could be reasonably expected to accrue to any other member of that profession, occupation, or group.
6. No Board member may also be an officer of any organization that sells goods or services to the Foothills Governing Board, except as provided in Code Section 20-2-505 and excluding nonprofit membership organizations.
7. No Board member shall sell to Foothills any supplies or equipment used, consumed, or necessary in the operation of any public school in this state unless there are fewer than three sources for such supplies or equipment within the county; provided, however, that any purchase pursuant to this subsection for supplies or equipment that is equal or greater than \$10,000.00 shall be approved by a majority of the members of the board in an open meeting. Any board member violating this shall be guilty of a misdemeanor.

8. The Foothills Governing Board may not do business with a bank or financial institution where a Board member is an employee, stakeholder, director or officer when such a member owns 30% or more stock in that institution.
9. No Board member shall accept a monetary fee or honorarium in excess of \$101.00 for a speaking engagement, participation in a seminar, discussion panel, or other activity which directly relates to the official duties of that public officer or the office of that public officer. Actual and reasonable expenses for food, beverages, travel, lodging, and registration for a meeting which are provided to permit participation in a panel or speaking engagement at the meeting shall not be monetary fees or honoraria.

#### Conduct As Board Members:

1. No Board member shall disclose to or discuss with any information which is subject to attorney-client privilege belonging to the Foothills Governing Board to any person other than other Board members, the Board attorney, the school superintendent, or persons designated by the local school superintendent for such purposes unless such privilege has been waived by a majority vote of the whole Board.
2. No Board member shall vote on the employment or promotion of any of his or her immediate family members. No immediate family member of a Board member may be employed or promoted unless a public, recorded vote is taken separately from all other personnel matters.
3. No Board member shall be employed in any position at Foothills in which they serve.
4. No Board member shall hold another county office.
5. No Board member shall be employed by the State Department of Education or serve concurrently as a member of the State Board of Education.
6. No Board member shall serve on the governing body of a private elementary or secondary educational institution.

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

1. Has read and understands the code of ethics and the conflict-of-interest provisions applicable to members of the local boards of education and has agreed to abide by them; and
2. Has agreed to annually disclose compliance with the State Board of Education's policy on training for members of local boards of education, the code of ethics of the local board of education, and the conflict-of-interest provisions applicable to members of local boards of education.

#### Personal Compensation

##### *Payroll*

Federal Program Specialist will work with the Regional Director for Finance and HR as well as the Finance Team to ensure payroll reports are accurate. Ensuring that the number of federally funded employees is consistent with the approved application. Monthly payroll reports, expenditure summary and detail reports, and substitute reports will be used to ensure that each object code is accurate. This is not applicable to employees funded by federal funds that have been consolidated with state and local funds.

##### *Temporary Work Agreements*

Federal Program Specialist will ensure that contracts are fulfilled, budgeted correctly, and that services were provided in accordance with the purchased services contract as well as communicated with the Finance department. This does not apply to employees funded with consolidated funds.

##### *Time and Effort*

Charges to a federal fund for salaries and wages must be based on records that accurately reflect the work performed. A time sheet must be maintained by any employee who provides supplemental instruction or services outside of school hours. The Federal Program Specialist will ensure that an annual periodic certification or personnel activity report will be maintained for all employees paid with federal funds. This does not apply to employees funded with consolidated funds.

##### *Periodic Certification*

An annual periodic certification will be maintained for any employee who worked on one federal grant or one cost objective. These certifications will be completed after-the-fact. The certification will be completed at the end of June (or on the last contracted day of the school year for employees who do not work year-

round). The forms are signed and kept on file in the office of the appropriate federal fund coordinator. This does not apply to employees funded with consolidated funds.

#### *Personnel Activity Report (PAR)*

A PAR will be maintained for any employee who works on more than one federal grant and more than one cost objective. Split-funded personnel paid with federal funds are required to maintain monthly time logs on Google Drive. The logs are shared among the employee, his or her supervising administrator, and the appropriate federal program coordinator. This does not apply to employees funded with consolidated funds.

#### *Stipends (GaDOE Rule 160-3-3.04)*

Foothills Regional High School waives this rule. Furthermore, while consolidated funds may be used to pay stipends, Foothills does not set aside federal funds to pay stipends.

### **Leave Policy**

Only full-time positions will earn any personal and sick leave. For more detailed information related to leave, please review Foothills policy GBRH.

### **Job Descriptions**

Job descriptions will be developed, maintained, and provided to the GaDOE for approval for all positions paid with non-consolidated federal funds.

### **Travel Policy (2 CFR 200.475)**

Costs incurred by employees and officers for travel, including costs of lodging, other subsistence, and incidental expenses, must be considered reasonable and otherwise allowable only to the extent such costs do not exceed charges normally allowed by Foothills Regional High School in its regular operations as the result of the school system's written travel policy. In addition, if these costs are charged directly to a federally funded source, documentation must justify that:

- Participation of the individual is necessary to the federal award; and
- The costs are reasonable and consistent with non-federal entities' established travel policy.

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

- A travel expense form must be completed in its entirety in order to receive reimbursement for expenses.
- Employees are responsible for ensuring that expenses claimed in the travel expense report are proper, accurate, and incurred for official business. A traveler who knowingly presents a false or fraudulent claim may be subject to penalties under criminal statutes.
- Employee completes and sends the "Travel Expense Statement" to their immediate supervisor and then to the Finance Department for approval. Failure to request reimbursement within 45 days of travel may result in a loss of or reduction of funds.
- Federal program coordinators must approve any applicable federally funded PL before payment occurs.
- Purpose of the trip must be included on the expense report.
- Attendees are responsible for maintaining and providing upon request information related to registration and dues and fees to include agenda, sessions attended, and proof of attendance.

#### *Transportation*

Mileage must be documented on a "Travel Expense Statement". From the State Travel Regulations, "Reimbursement for business use of a personally owned vehicle is calculated per mile, from point of departure after deduction for normal commuting mileage, based on the current reimbursement rate."

Employees may be reimbursed for the mileage incurred from the point of departure to the travel destination but NOT for their normal commuting mileage. The Finance team will choose a home site based on where the employee lives. If another site opens during the year that is closer to their home address, the Finance department will notify them of any change to their Foothills home site location.

Employees traveling by personal vehicles and requesting reimbursement must record the actual odometer readings on the expense statement. Parking fees and tolls paid may be reimbursed and employees are expected to obtain receipts for these expenses. If it is not possible to obtain a receipt, a written explanation should be included on the expense statement.

#### *Lodging*

To receive reimbursement for lodging expenses, the following guidelines must be followed:

- Lodging must be documented on a “Travel Expense Statement”.
- Employees are responsible for making their own reservations and guaranteeing them.
- Employees are responsible for submitting a copy of the tax exemption form for state and local hotel/motel excise taxes if staying at a hotel in Georgia. Any tax paid, must have an explanation of why it was not waived, for example, paid with personal credit card, state does not allow or \$5 State Hotel Motel Fee, no exemption allowed.
- Employees must travel more than 50 miles.
- Employees should use the least expensive rates for lodging.
- Expenses must be broken down by date. Receipts are required.
- Any out-of-state travel must first receive the superintendent’s approval.

#### *Subsistence*

The following guidelines must be followed for the reimbursement of meals:

- Meal reimbursement cannot exceed the following: Breakfast - \$13.00; Lunch - \$14.00; Dinner - \$23.00.
- Meal reimbursement for out of state overnight travel are generally eligible for per diem amounts designed to cover the cost of three (3) meals per day for all days on travel status other than the day of departure and the day of return. Travelers are eligible for 75 percent (75%) of the total per diem rate on the first and last day of travel.
- Expenses must be broken down on the expense report per meal.
- Taxes and tips are allowed and should be included in the total. However, this total should not exceed the per meal rate.

#### *Expense Reimbursement*

To receive expense reimbursement, the following guidelines must be followed:

- Employees must submit expense reports within 45 calendar days of completion of travel.
- Foothills Regional High School prefers and strongly urges all receipts to be attached to the travel expense report for verification and for future audit needs.
- Travel expense reports may be selected for audit at any time and all required receipts must be retained by the traveler for three years after the travel date **if** not attached to the expense report.
- All source documentation must be included.

### **Suspension & Debarment (2 CFR 180.220 & 2 CFR 200.213)**

The Regional Business Manager checks the System for Award Management ([SAM website](#)), prior to approving any contract or subcontract expected to equal or exceed \$25,000 to ensure the vendor is not on the list of suspension and debarment. Foothills cannot and does not purchase from any vendor or contracted person/company identified on this website as being suspended or debarred. Evidence of the verification will be in the form of a search result screenshot attached to the vendor documents.

### **Equipment Management (2 CFR 200.313(d))**

An inventory of tangible personal property having a useful life of more than one year will be maintained at the system level. This includes all items purchased under state object codes 615 (expendable equipment) and 616 (expendable computer equipment).

Note: Any equipment purchased with consolidated federal, state, and local funds - CF150, will be inventoried and entered with the inventory code - Schoolwide Consolidation of Funds. These items will not be subject to federal equipment guidelines.

#### *Requisition of Equipment:*

All purchases with Federal Programs funds will be made only after proper approval by appropriate personnel in the Federal Programs and Business Services departments. Purchases must be allowable, supplemental, consistent with academic assessment needs, and costs deemed as reasonable and necessary for operating federal programs. Federal funds are not to be used for general expenses required to carry out other responsibilities of a state or its sub recipients. Books and consumable items are not included on the inventory.

#### *Entry of information into inventory and management system:*

Federal Programs inventory is entered directly into the Foothills Inventory Management Software - Incident IQ within 30 days and include the funding source, purchase date, purchase order #, purchase price and any other available details related to the purchase. The inventory system will be maintained by the Regional and Site Technology staff. Once entered into the spreadsheet, inventory administrators tag and label each item with appropriate site and tag information.

#### *On-site Use of Student Devices*

Students will check out a Chromebook in their current subject room to use for the duration they are in that room. Some sites will have a central checkout point for all subject areas. (This can be tracked on paper or with a Google Form.)

#### *Off-site Use of Equipment:*

Typically, there is no off-site use of equipment purchased with federal funds at Foothills Regional High School.

#### *Physical Inventory:*

Inventory of all equipment and property belonging to any federal program will be identified and inventoried on at least an annual basis. The Regional Technician for Foothills, with the assistance of the inventory administrators at the sites, annually verifies the inventory in Incident IQ. The regional technician, site inventory administrators and the site director sign/date to verify the inventory data is the most current and accurate record of technology inventory including federal programs inventory items. Federal programs inventory will be randomly spot-checked by the Federal Programs Specialist on an annual basis each spring. Materials purchased for use in federal programs are labeled and are to be utilized in the capacity for which they were purchased. Any equipment, materials and/or supplies purchased with federal funds are considered solely for the use of that program. With the help of the inventory administrator, the site/regional director must ensure that federal programs inventory remains in use in an allowable capacity. During physical inventory checks, the inventory administrator and site/regional director will determine if the item is assigned to an allowable person and being used in an allowable way. Any discrepancies with personnel assignment or allowable use will be immediately re-assigned and rectified.

#### *Equipment Disposition: no longer needed for original intent, loss, damage or theft:*

##### Disposition

Inventory records are maintained once equipment has been disposed of for a period of three years, after which the item can be removed from inventory. Disposition can occur if the equipment is no longer needed for its original intent or purpose or in the event the equipment is no longer usable.

##### Adequate Safeguards

Equipment that is damaged, lost, or stolen will be reported to the Federal Programs Specialist. A Report of Lost, Stolen, or Damaged Technology Equipment will be generated by the inventory administrator in Incident IQ and signed by the site director. A police report will be required for stolen property. A copy of the Incident IQ Report of Lost, Stolen or Damaged Technology Equipment and/or police report will be forwarded to the Federal Programs Specialist. Replacement of lost, stolen, or damaged equipment will be handled on a case-by-case basis with the ultimate decision resting with the Superintendent. Depending on the situation, individuals may be asked to provide a comparable replacement device or pay a monetary amount comparable to the actual cash value of the device.

##### Steps for Retrieval of Student Technology Devices

1. During the withdrawal process, the registrar will be responsible for verifying if there is a technology flag on the student's account.

2. Once it has been determined that the student has a device assigned to them, the registrar will notify the parent and/or student via phone or in person requesting the device is returned. If necessary, a follow-up will be conducted in writing. All communication regarding the return of the student devices must be documented in the General Contact Log.
3. Upon withdrawal, an auto-email is sent to the inventory manager. Inventory manager will then disable the device so it can no longer be used. Local staff (admin, mentor, registrar or office manager) will work with a social worker or SRO to attempt retrieval from the student's home.
4. If still no response, the site administration will contact Regional Technician to attempt device retrieval through regional SRO.
5. Once the device has been retrieved, the inventory manager must update the owner to remove the student's name in Incident IQ. Also, end date the flag inside of IC.
6. All steps in the above process must be noted in the General Contact Log in IC.

#### Safeguards for Unauthorized Use or Disposition

To ensure authorized use, inventory is conducted at least annually to determine location, condition and appropriate use of federally purchased equipment. Materials and equipment will be disposed of following the disposition of property procedure. Although every effort is made to repair and/or refurbish equipment to extend its usefulness, the inventory administrator determines when Federal Programs inventory equipment is broken or obsolete. Broken and obsolete equipment is removed from use and marked for disposal. Equipment is physically removed from the school by a third party which disposes of the equipment in an environmentally friendly method. In the event that a federal program is no longer available, or the equipment is no longer effective, federally purchased equipment will be transferred equitably to the inventory of another functioning program. Equipment with an acquisition cost of less than \$5,000 which is at least five years old and no longer effective is purged or transferred to another location. When transferring federal inventory, the order of priority is: an existing federal program (such as another site or another program such as Special Education); then local programs. Every effort should be made to transfer the equipment into a capacity where it continues to serve its original intent of purchase. Inventory spreadsheets will indicate the disposition date for three years, before being permanently removed/archived from inventory records.

#### **Capital outlay purchases:**

If Capital outlay purchases are made in the future, they will be consistent with approved Title I, Part A budget/budget amendment (Object Code 700). They will be pre-approved by the Georgia Department of Education prior to being included in the budget.

#### *Maintenance Procedures to Keep Property in Good Condition*

Federal program coordinators will work cooperatively with the Technology Services Department to ensure that equipment is properly maintained to ensure longevity. Accurate records will be maintained about the current condition of equipment purchased with federal funds.

#### **Cash Management (2 CFR 200.302(b)(6)) (2 CFR 200.305) & Drawdown of Funds (2 CFR 200.305(b)(3))**

Funds are drawn down based on actual program expenditures. It is the responsibility of the Federal Program Specialist and the Regional Director for Finance and HR or their designee to work cooperatively to review all expenditures on a monthly basis after budget approval before funds are drawn down from GAORS. Moreover, the following practices are observed:

- Federal programs must reconcile their respective budgets at least quarterly to ensure that all expenditures charged to their program are allowable.
- Regional Director of Finance and HR or designee will perform periodic reviews of the general ledger, including federal accounts and fund sources.
- The Regional Business Manager runs a monthly report out of the financial software to draw down funds. Federal Program Specialist or their designee will sign a printed copy, or send an email verifying the accuracy of the report.
- Funds are drawn down monthly based on actual expenditures and on a reimbursement basis only.
- The Regional Director of Finance and HR reviews, signs and dates the report. Or send an email approval.
- The Business Manager logs into the appropriate agency.



- When the drawdown is received into the school's bank account, the Business Manager will create a journal entry in the accounting software. The Regional Director for Finance and HR will review, approve and post the journal entry to the general ledger.
- The Business Manager reconciles all bank statements and performs periodic review of the general ledger.
- There is no cash involved as all drawdowns are directly deposited into the system's bank account.
- Federal Programs ensure that equipment/supplies are purchased and received during the period of performance of the grant award.
- The school system does not request advance payments for federal fund disbursements, only reimbursements.
- All reporting documentation is kept in the Finance Department and is available for review upon request.

At year end reconciliation for GAORS grants, a report is printed from the accounting software along with the Consolidated Application, and the Federal Program Specialist reviews and signs off that the completion report may be entered. An email of approval can be sent in lieu of signature. After data is entered, the reports are given to the Regional Director for Finance and HR for review and approval. The Business Manager will then submit to GaDOE. The original is kept on file in the Finance department and a copy is made for the Federal Program Specialist.

### **Consultants, TWA, Purchased Services for Federal Funds**

Temporary Work Agreements (TWA) (not contracts) are required for all consultants and purchased services. Agreements are entered into between Foothills Regional High School and the consultant. Each contract contains the following:

- TWAs are generated by appropriate regional departments issued by CFO and Federal Program Specialist and approved by the Superintendent.
- Specific duties are specifically spelled out for each contract.
- The person must also submit to be fingerprinted if they are working with students.
- If the contract is with a TRS retiree, the individual must be approved yearly through the Human Resources Department prior to beginning services.
- The contract includes the number of hours to work and the rate of pay.

Each contract is signed by the following: contractor, Superintendent, Regional Director for Finance and HR or appropriate Regional Director, and the Federal Program Specialist. The appropriate federal program provides oversight in ensuring that all contractors' work is complete and that subrecipient requests have been evaluated before funds are released for reimbursement. Artifacts, daily sign in sheets, and completion of all workshops are kept on file by the appropriate federal program. The appropriate federal program signs off on all invoices/contracts prior to the issuance of payment for services. These contracts must be maintained and kept by the appropriate program.

### **Period of Performance Flexibility (2 CFR §200.77, 200.309, 200.403(g); 34 CFR §76.707)**

The intent of federal funds is to benefit students, teachers, and site leaders in that fiscal year through the grant period as indicated on the Grant Award Notice (GAN). Regarding purchases that cross grant periods (software, computers, equipment):

- Purchases may extend beyond one year to take advantage of cost reductions, If the students, teachers and site leaders in the current fiscal year receive benefit from the purchase.
- Leases and licenses – All instructional software subscriptions must be purchased prior to January.
- Professional Learning registration – To maximize cost efficiency, the LEA may take advantage of “early bird” professional development registration where early registration occurs in the original grant period and the actual professional development occurs in the carryover period.

Supporting documentation will be kept on file. Every effort should be made to align all purchases to the original grant period as much as possible.

### **Grant Development and Budget Process**

The Regional Director for Finance and HR and assigned personnel, in conjunction with federal programs personnel create yearly budgets. The Regional Director for Finance and HR or their designee ensures that all funds budgeted are allowable per funding source. The budget is forwarded to the Finance department after the GaDOE approves the budgets in the Consolidated Application. The Regional Director for Finance and HR and/or designee enters the budget into the system financial software using the Consolidated Application budget as the source.

## **Supplement Not Supplant**

Note: Foothills currently consolidates federal, state and local funds. As such, the supplement not supplant guidelines are not applicable to the consolidated funds. Foothills does not maintain a Resource Allocation and Management Plan (RAMP) due to being a one school district.

Foothills does not consolidate the School Improvement funds. Careful attention is paid to all non-consolidated funds to ensure that all budgeted and purchased items are supplemental to Foothills.

Supplement not supplant rules do not apply to the Elementary and Secondary School Emergency Relief (ESSER) Act, which includes Coronavirus Aid, Relief, and Economic Security (CARES) Act, Coronavirus Response and Relief Supplemental Appropriations (CRRSA) Act, and the American Rescue Plan (ARP) Act.

## **Transferability**

LEAs are provided the opportunity to transfer funds under the Every Student Succeeds Act. Foothills exercises this right and transfers the entire amount of Title II-A and Title IV-A into Title I-A. The combined funds are consolidated with state and local funds. Foothills follows all guidelines associated with both the transfer of funds under ESSA and the consolidation of funds as outlined in the Georgia Department of Education's Consolidation of Funds manual.

## **Accounting Records (2 CFR 200.302(b)(3))**

The following internal controls have been created and designed to provide reasonable assurance regarding the achievement of objectives in the reliability of reporting for internal and external use.

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

Completion reports are annual reports required by Georgia Department of Education (GaDOE) for all grant funds. Reports are due thirty days after the end date for each grant. Prior to preparing the completion report, the general ledger report for each grant will be reviewed to ensure that all expenditure postings are correctly recorded.

General ledger reports will be generated for each grant by function and object codes.

The Finance Department completes these steps in the system financial software:

1. A finance representative will run an account activity summary report in the system financial software for all related expenses for the grant (July thru September of current year for grants ending on September 30th or previous July thru June for grants ending on June 30th).
2. The Business Manager will send the summary report to the Regional Director for Finance and HR and/or Program Director for sign-off.

## **Monitoring and Reporting Program Performance (2 CFR 200.328)**

Foothills Regional High School undergoes regular monitoring and audit visits as scheduled by the State of Georgia.

Corrective action plans are created to reconcile any findings received. The school system will maintain the appropriate documentation to indicate that corrective 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 Program Specialist will review all items. The Cross-Functional Monitoring report will be retrieved from the GaDOE website under the Consolidated Application.
- Each item will be examined carefully, and a team of system-level staff will determine the best means of corrective action.
- Items are gathered, and a report is written by the Federal Programs Specialist.
- 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.

### **Necessary, Reasonable and Allocable Costs (2 CFR 200.403-200.405)**

Expenditure of federal funds must meet the clause of “allocable, reasonable, and necessary.” When considering a purchase with federal funds, the following questions will be considered:

- (a) Is the cost of goods or services chargeable or assignable to the federal award in accordance with relative benefits received (allocable)?
- (b) Do I have the capacity to use what I am purchasing (reasonable)?
- (c) Did I pay a fair rate, and can I prove it (reasonable)?
- (d) Does this expenditure exceed that which would be incurred by a prudent person under the circumstances prevailing at the time the decision was made to incur the cost (reasonable)?
- (e) Is the proposed cost consistent with the underlying needs of the program (reasonable)?
- (f) Do I really need this (necessary)?
- (g) Do I need to spend these funds to meet the purposes and needs of the program (necessary)?
- (h) Is this expenditure related to an identified area of need in an improvement plan (necessary, allocable)?
- (i) Would I be comfortable defending this purchase (allocable, reasonable, and necessary)?

### **Capital Expense Funds (2 CFR 200.439)**

Foothills Regional High School does not use federal funds to budget items under object code 700 (capital expense).

### **Ethics and Fraud, Waste, Abuse, and Corruption**

#### *Purpose:*

To ensure the reporting of suspicion of fraudulent activity, Foothills Regional High School provides employees, clients, and providers with confidential channels for such reporting.

#### *Definitions:*

Fraud: A false representation of a matter of fact, whether by words or by conduct, or by concealment of that which should have been disclosed, that is used for the purpose of misappropriating property and/or monetary funds from federal grants.

#### *Statement of Administrative Regulations:*

Prior to employment, all Foothills staff complete Compliance Director modules which includes ethics training. The Foothills Regional High School thoroughly and expeditiously investigates any reported cases of suspected fraud to determine if disciplinary, financial recovery and/or criminal action should be taken.

#### *Confidentiality:*

All reports of suspect fraud must be handled under the strictest confidentiality. Only those directly involved in the investigation should be given information. Informants may remain anonymous but should be encouraged to cooperate with the investigators and should provide as much detail and evidence of alleged fraudulent act as possible.

#### *Procedures and Responsibilities:*

1. Anyone suspecting fraud concerning federal programs should report their concerns to: Foothills Regional High School at 2415 Jefferson Road, Suite B, Athens, GA 30607, phone: 706.395.9775.
2. Any employee with the Foothills Regional High School (temporary staff, full-time staff and TWAs) who receives a report of suspected fraudulent activity must report this information within the next business day. You are to contact Dr. Sherrie Gibney-Sherman at 706.395.8661 or 706.224.2287. Employees have the responsibility to report suspected fraud. All reports can be made in confidence.
3. The Foothills Regional High School shall conduct investigations of employees, providers, contractors, or vendors.
4. If necessary, you will be contacted for additional information.
5. Periodic communication through meetings should emphasize the responsibilities and channels to report suspected fraud.

## Complaint Procedures

Any complaints issued as a result of any federal programming, including Title I, Part A (Disadvantaged Children), Title I, Part C (Migrant Education Program), Title I, Part D (Neglected and Delinquent), Title II, Part A (Teacher and Leader Quality), Title III (English Learners and Immigrant Students), Title IV, Part A (Student Support and Academic Enrichment), Title X, Part C (McKinney-Vento Education for Homeless), IDEA, and the Elementary and Secondary School Emergency Relief (ESSER) Act, which includes Coronavirus Aid, Relief, and Economic Security (CARES) Act, Coronavirus Response and Relief Supplemental Appropriations (CRRSA) Act, and the American Rescue Plan (ARP) Act must be filed according to the system federal programs complaint procedures policy. The school system will use the Tracking Form for Resolution of Complaints (Appendix B) to ensure that complaints are resolved in a timely manner. This form is maintained by the Federal Programs Department and at the reception desk at the central office. See 'Appendix A: Complaint Procedures'

## Elementary and Secondary Schools Emergency Relief (ESSER Funds)

All funds allocated to Foothills Education Charter High School for the CARES and CRRSA have been expended with completion reports. Foothills did not use any relief funding on construction/renovations or minor remodels.

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

The Elementary and Secondary Schools Emergency Relief (ESSER) Act authorized the establishment of the Coronavirus Aid, Relief, and Economic Security (CARES) Act, Coronavirus Response and Relief Supplemental Appropriations (CRRSA) Act, and the American Rescue Plan (ARP) Act to offset the challenges experienced by schools because of the COVID-19 pandemic. While ESSER complies with the EDGAR and UGG regulations, it is a separate act from the Elementary and Secondary Education Act (ESEA) which governs the rules for Title I, Part A, Title I, Part C, Title II, Part A, Title IV, Part A, Title IV, Part B, Title IX, Part A and IDEA that are all described below. ESSER is inclusive of the Foothills Regional High School's internal controls, expenditures, inventory, drawdown, and cost principles as previously described.

### Section 18003 of Division B: Coronavirus Aid, Relief, and Economic Security (CARES) Act

#### *Description and Purpose*

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

#### *Carryover*

The grant period for these funds ended on September 30, 2021. A completion report was submitted on October 30, 2021. Funds were uploaded in the FY22 Consolidated Application. The carryover period ended on September 30, 2022. The final completion report was due on October 30, 2022.

#### *Equitable Services*

An LEA that receives ESSER funds under the CARES Act (section 18005) must provide equitable services to non-public school students and teachers in the same manner as provided under section 1117 of Title I, Part A of the ESEA. Foothills did not have an attendance zone, therefore the equitable services did not apply to Foothills Regional High School.

### **Section 313: Coronavirus Response and Relief Supplemental Appropriations (CRRSA) Act**

#### *Description and Purpose*

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

#### *Carryover*

The grant period for these funds ended on September 30, 2022. A completion report was due on October 30, 2022. Funds were uploaded in the FY23 Consolidated Application. The carryover period will end on September 30, 2023. The final completion report will be due on October 30, 2023.

### **Section 2001: American Rescue Plan (ARP) Act**

#### *Description and Purpose*

The American Rescue Plan was passed by Congress on March 10, 2021, and signed into law on March 11, 2021. The American Rescue Plan continues many of the programs started by the CARES Act (2020) and Consolidated Appropriations Act (2021) by adding new phases, new allocations, and new guidance to address issues related to the continuation of the COVID-19 pandemic. The American Rescue Plan also creates a variety of new programs to address continuing pandemic-related crises, and fund recovery efforts as the United States begins to emerge from the COVID-19 pandemic.

#### *Carryover*

The grant period for these funds will end on September 30, 2023. A completion report will be due on October 30, 2023. Funds will be uploaded in the FY24 Consolidated Application. The carryover period will end on September 30, 2024. The completion report for carryover funds will be due on October 30, 2024.

#### *Maintenance of Equity*

The maintenance of equity provisions outlined in the ARP Act ensures that schools and LEAs serving large proportions of historically underserved students receive an equitable share of state and local funds as the nation continues to respond to the COVID-19 pandemic's impact. The ARP contains LEA maintenance of equity requirements for FYs 2022 and 2023.

#### *Required 20% to Address Learning Loss*

The LEA must reserve at least 20 percent of funds to address learning loss by implementing evidence-based interventions and ensure that those interventions respond to students' social, emotional, and academic needs and address the disproportionate impact of COVID-19 on underrepresented student subgroups.

Remaining LEA funds may be used for a wide range of activities to address needs arising from the coronavirus pandemic, including any activity authorized by the ESEA, the Individuals with Disabilities Education Act (IDEA), Adult Education and Family Literacy Act (AEFLA), or Carl D. Perkins Career and Technical Education Act of 2006 (Perkins CTE).

#### *In-Person Instruction Plan and Application*

An LEA that receives ARP ESSER funds must publicly make a plan for the safe return to in-person instruction and continuity of services on its website. Before making the plan publicly available, the LEA must seek public comment on the plan. The LEA must assure, during the period of the ARP ESSER award established in section 2001(a) of the ARP Act, that it will periodically, but no less frequently than every six months, review and, as appropriate, revise its plan. Consistent with section 2001(i)(2) of the ARP Act, the LEA will seek public comment on the development of its plan, the LEA will seek public input and take such input into account in determining whether to revise its plan and, if it determines revisions are necessary, on the revisions it makes to its plan. The plan must be submitted to the GaDOE for review and approval.

Documentation must be provided as evidence that the above consultation has occurred, and the resulting information was used to review and update the district plan as appropriate twice yearly beginning October 22, 2021, and continuing through October 22, 2023.

## **Title I, Part A Improving the Academic Achievement of the Disadvantaged**

### **Within District Allocation Procedures**

#### *Required Set Asides Reservation of Funds*

After receiving notification of the Title I, Part A grant amounts from GADOE, reservations in each budget are set aside for required components or purposes such as parent involvement, and homeless students. Homeless funds are set-aside based on the needs of the homeless school population.

#### *Parent and Family Engagement*

**Required 1% Set Aside for Parental Involvement:** If the allocation for Foothills is greater than \$500,000, Parents will be informed about the 1% set aside during the Fall Annual Meeting and participate in the discussion regarding this requirement each Spring during Title I planning meetings held at each site so a determination can be made on how these funds will be spent. If the total 1% is not expended, the difference must be carried over to the following fiscal year.

#### *Calculating Parent and Family Engagement Carryover*

If Foothills receives an allocation greater than \$500,000 and a parent and family engagement set-aside becomes applicable, the following will occur. A worksheet will be provided by the GaDOE to determine the amount of parent and family engagement carryover from the previous fiscal year. The Federal Programs Specialist will complete and upload this worksheet, along with a detailed expenditure report for family engagement for the previous year to the Consolidated Application Attachments tab.

### **Family Engagement**

#### *Parent Involvement Policy Overview*

Foothills Regional High School has an ongoing commitment to all parents since we are one school. 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 parents and their children receive extraordinary services and assistance that will lead to improved academic achievement. The school 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 school will assist parents of all socioeconomic levels in solidifying their ongoing commitment to their child's success.

#### *Technical Assistance to Schools*

Technical Assistance to sites on Parent Involvement Requirements and Best Practices - the Federal Program Coordinator provide technical assistance to sites in the following ways:

- Professional learning sessions during administrative and curriculum meetings and regional staff meetings.
- One-on-one meetings held at each site between federal programs personnel and site director/designee as needed
- The creation and sharing of a Federal Programs Handbook.
- Technical assistance with planning, organizing, and conducting parent meetings.
- Ongoing emails and phone calls.

#### *Parent Notifications*

##### **Communication in an Understandable Format**

Upon enrolling their child(ren) in Foothills Regional High School, every parent indicates their household's preferred communication language as a standard part of the registration process. To the extent practical, efforts are made to provide either written support or support through an interpreter when a parent indicates

a language other than English. Language Line is utilized for interpretation when a face-to-face interpreter is unavailable. Furthermore, all parent communication is written in a format so that the content is easily understandable.

### **School Designation Status**

A site identified as needing Comprehensive or Targeted Support Interventions will receive the support of the Foothills Regional Office and/or School Improvement Division of the GaDOE as appropriate. Parents will be notified of the designation status using multiple means of communication. It will be shared at each site's annual meeting as well as on Foothills website.

### **Parent Right to Know**

In accordance with ESSA, all schools are required to notify parents at the beginning of each school year of their "Right to Know" the professional qualifications of their student's classroom teachers and paraprofessionals. The Parent's Right to Know Teacher's Training and Credentials is included in the student handbook each year. The notification uses the language of the law and occurs within 30 calendar days from the start of school or upon enrollment. Parents acknowledge that they have received the handbook with the parents right to know. The Parents Right to Know notification is also posted on the school webpage.

### **20 Day Notification of Professional Qualifications**

In accordance with ESSA, Foothills will provide timely notice to parents when students have been taught for four or more weeks by a teacher who does not meet applicable state certification or licensure requirements at the grade level and subject area in which the teacher has been assigned. Notification requirements apply to all teachers in all schools/programs. Notifications will be sent within ten business days following the four consecutive weeks. For verification purposes notifications must contain day, month, and year of notification; the name of the teacher who has not met PQ, the name of the school and district; and a statement that the teacher has not met state certification or the school's waives PQ requirements for the grade and subject in which the teacher is assigned. The notification will be sent in a format that ensures parents have the opportunity to receive the information. This may include: first class mail, parent link communication and/or email blast. To the extent practicable, the notification will be in a language the parent will understand. This applies to all teachers in all schools/programs.

Notifications are not required for paraprofessionals, substitutes, or lack of a clearance certificate.

Upon placement, the Site Director will contact the HR Coordinator. The HR Coordinator will collaborate with the Federal Programs Specialist to indicate the need to send a 20 day notification to parents and review the requirements. Prior to the 20 day mark, a draft letter will be agreed upon and the letter translated, if necessary. Within ten business days following the four consecutive weeks, the notification will be sent to parents. Evidence of dissemination will be kept on file in the HR office as well as with the Federal Program Specialist.

### **Family Engagement Plan**

Title I, Section 1118 of the Elementary and Secondary Education Act of 1965 (ESEA) requires that each school receiving Title I, Part A funds develop jointly with, agree on with, and distribute to parents of participating children a written parental involvement policy.

Foothills Regional High School is committed to cultivating and sustaining partnerships with parents and community stakeholders, and encourages their participation in the development, implementation, review and evaluation of its family engagement plan. This written plan focuses on improving academic achievement and school performance and outlines how Foothills will coordinate, provide technical assistance and other support to sites in planning and implementing effective parental involvement activities, trainings, and workshops. Foothills will jointly develop with parents a Family Engagement Plan. The plan will be made available to parents of students enrolled in Foothills Regional High School using multiple

means. The plan will be available on the Federal Programs page of the school's website ([www.foothillsrhs.org](http://www.foothillsrhs.org)), as well as shared with parents at the Fall meeting and the input meeting in the Spring.

The family engagement plan is reviewed and revised annually with parents and other stakeholders (teachers, site directors, administrators, and other site personnel). Sites hold individual meetings for review of the plan during spring Title I planning meetings. All parents, teachers, administrators, and other site personnel are invited to the meetings to provide input. Invitations are sent in multiple ways including email, social media, Remind 101, and flyers posted at the sites and on the system website. For parents who are not able to attend a spring planning meeting, an announcement and link will be posted on the main website for providing input. In addition, questions soliciting input on the plan will be included in the annual Title I survey which is distributed as an announcement on the main website and also emailed to parents. The Federal Programs Specialist or designee will be responsible for collecting the required information (agendas, meeting notes, and sign in sheets). Meetings will be held in the spring to revise plans for the next school year. The GaDOE Parent Involvement Policy checklist will be applied to the plan. Revision dates will be clearly marked on the plan. Plans include activities/workshops that have been identified and requested through the previous year's annual parent survey. The family engagement plan is posted on the website and made available at the Foothills Regional Office and at each Foothills site.

### **School/Parent Compacts**

Foothills Regional High School will share responsibilities for student academic achievement with all parents and students enrolled in the school system and will develop, in collaboration with parents and students, a school-parent compact that outlines how parents, site staff, and students will share the responsibility for improved student academic achievement. The school-parent-student compact will also describe the means by which the school, parents, and students will build and develop a partnership to ensure student mastery of the Georgia Standards of Excellence.

All sites are required to have school-parent compacts. It is the responsibility of the Federal Programs Specialist or designee to make sure that the compact is reviewed and revised annually. The review and revision will occur in the spring of the year at annual Title I parent planning meetings. Revision dates will be clearly marked on each compact. An invitation will be sent to all parents at each site and meeting dates will be publicized on the website, via email, social media, and/or Remind 101. Flyers will be posted at each site. The Federal Programs Specialist or designee will be responsible for coordinating with sites to schedule meetings and collect required information (agenda, meeting notes, and sign in sheets). Parent compacts will include responsibilities for the teachers, parents, and students. Electronic compacts will be distributed to all parties involved for signatures each fall and as students enroll. Copies of the electronic signed parent compacts are kept on electronic file.

### **Annual Title I Meeting**

All Foothills sites are required to hold an annual meeting at the beginning of the school year, before November 1st. It is the responsibility of the Federal Programs Specialist or designee, in collaboration with Site Directors, to arrange meeting times and invite all stakeholders to the meetings. The Federal Programs Specialist or designee will be responsible for collecting and submitting documentation of the required Title I Annual Meeting, including copies of sign in sheets, agendas, and multiple ways of inviting parents. Meetings are publicized via flyers sent to parents, e-mails, the website, social media, Remind 101 and flyers posted at each site.

### **Annual Evaluation of Parental Involvement**

**Process to Collect:** An annual survey is conducted each spring. The survey is conducted online. However, parents are informed of the availability of a paper survey if they so desire. Advertisement of the survey and requests for completion occur through emails, the website, and Remind 101. The survey is collected and compiled, and the following year's parent involvement activities are built from the responses.

**Process to Review:** The results of the survey are shared among several groups of stakeholders, including, but not limited to, parents, regional and site leaders, employees, and community members. The results of the survey are used to review and revise schoolwide and parent involvement plans and components.

**Actions Taken to Improve the Quality and Effectiveness of Parent Involvement Policies and Practices:** Federal programs personnel review the annual spring survey results, as well as all feedback received during the annual needs assessment



process prior to and with other Foothills personnel, at the strategic planning meeting. Additions/deletions/revisions are discussed and agreed upon during this meeting. Formatting and revisions are made after the meeting and then provided to stakeholders for review and suggestions.

Parent involvement workshops and activities are planned for the following year based on information gained during the annual comprehensive needs assessment process. Many opportunities are provided for building strong parent capacity. The purpose is to ensure effective parental involvement and to support a partnership among sites, parents, and the community to improve student academic achievement through the following activities: annual meetings; conferences; email communications; phone calls; parent workshops and activities; family nights; volunteering; open houses; annual notification of school designation; newsletters/flyers/brochures; and website information.

### **Building Parent Capacity**

Information is provided to site personnel and parents on how to build parent capacity through presentations made during meetings, through emails, through response to parent needs on surveys, through information received from the GADOE Family-School Partnership Program, and through student handbooks, newsletters, and flyers.

Federal programs personnel consider, and plan 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 prekindergarten programs? (Not applicable for Foothills)
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?

### **English Learners Participating in Title I Supplemental Language Programs**

No later than 30 calendar days after the beginning of the school year (or within the first two weeks of an EL being placed in a program), the Federal Programs Department will notify parents of English Learners if their child may be participating in a supplementary language program as part of the consolidated program. The notification will be provided in a language parents can understand. Initial letters will be mailed home to the parents of students who may receive supplemental services under consolidation of funds along with the required OCR notification of eligibility letter. As new students who are identified as ELs enroll, subsequent letters will be generated by the ESOL Coordinator and the Federal Programs Specialist and mailed along with the OCR eligibility letter. As letters are sent to parents, a copy is kept in the student's hard copy electronic folder as well as the secure google drive folder for EL.

### **Schoolwide Program**

#### *Overview*

A schoolwide program is a comprehensive reform strategy designed to upgrade the entire educational program in a Title I school. The purpose of schoolwide Title I programs is to improve the entire educational program in a school which should result in improving the academic achievement of all students, particularly the lowest achieving students. The goal of such a program is to assist those students with demonstrating proficiency on academic standards. A school is eligible to be a schoolwide program:

- If the local educational agency (LEA) determines that the school serves an eligible attendance area.
- If for the first year of the schoolwide program, the school serves a school attendance area in which not less than 40 percent of the students enrolled in the school are from low income families.
- If the school consults with stakeholders and makes a decision to become schoolwide.

#### *Schoolwide Title I programs must:*

- Conduct a comprehensive needs assessment;
- Identify and commit to specific goals and strategies that address those needs;
- Create a comprehensive plan; and
- Conduct an annual review of the effectiveness of the schoolwide program and revise the plan annually or as necessary.

Adopting this strategy should result in an ongoing, comprehensive plan for school improvement that is owned by the entire school community and tailored to its unique needs. Schoolwide programs are not required to identify specific students as eligible. They must supplement (enhance) rather than supplant (take the place of) the services participating students would receive if they were not participating in the schoolwide program.

#### *Components of a District/Schoolwide Program*

Each schoolwide program must create a plan to address the following components of the GaDOE Schoolwide Program Checklist:

1. Comprehensive Needs Assessment
2. Schoolwide Reform Strategies
3. Schoolwide Plan Development
4. ESSA Requirements for Schoolwide Plans

In addition, the school providing a schoolwide program must also evaluate its plan by reviewing, on an ongoing basis, the progress of all children. If necessary, the school must adjust its plan to provide additional assistance such as an extended school year, before and after school programs, summer programs, and training for teachers on how to identify students requiring additional assistance and how to implement student achievement standards in the classroom.

Foothills Regional High School is a Schoolwide Program. This allows all children at Foothills and their parents equal access to all related Title I assistance. Foothills is both a LEA and a school. The District Improvement Plan and Schoolwide Plan are the same document for Foothills. Annually, Foothills engages required stakeholders in planning for continuous improvement. All faculty and staff are surveyed for input around continuous improvement/strategic planning. All parents are surveyed annually through the Title I annual survey as well as the Parent Climate Survey. For FY24 Foothills used the surveys within the Cognia accreditation process to survey parents, staff and community. Foothills completes a comprehensive needs assessment and seeks input from the Board. Foothills conducts meetings with parent focus groups to both identify needs and seek possible solutions/actions for improvement. The Superintendent and Board hosts an annual strategic planning meeting where stakeholders work collaboratively to review all data components, prioritize needs, and revise the schoolwide plan to address identified prioritized needs around the five areas of continuous improvement.

#### **LEA Guidance**

The Federal Programs Specialist and other program coordinators review the checklist components and update the schoolwide plan as necessary to meet checklist requirements. System leaders support sites in developing, revising, implementing, and coordinating school improvement efforts during regularly scheduled SIP meetings to ensure implementation of the strategic plan and schoolwide plan. During these meetings, data is analyzed to determine progress toward achievement goals, as well as to develop solutions to challenges related to instructional strategies, student performance around standards, parent involvement, professional learning, and budgets. Due to additional funds for being identified as Comprehensive Support and Improvement school each site has at least one Site Improvement Facilitator to review and analyze systemwide and site-specific data with Regional and site curriculum teams to ensure changes are made with instruction, curriculum, and assessment. System Leaders monitor the changes, and all available resources are used to address student needs.

#### **District/Schoolwide Program Plan Development**

The district/schoolwide plan is updated during and after the annual strategic planning meeting each summer. Stakeholders work collaboratively to review data, including parent input from spring planning meetings, Title I parent survey data, faculty and staff survey data, student achievement analysis, climate survey data, focus group data, and other data as relevant to the district/schoolwide plan development process. During the annual strategic planning meeting, instructional strategies, parental involvement initiatives, and professional development activities are planned after a careful analysis of the relevant data. The schoolwide plan is reviewed and updated to be reflective of the decisions made during the annual strategic planning meeting and after seeking Board input. It is through this process that the Foothills oversees the development of site-based improvement plans.

**Consolidation of Funds**

Foothills Regional High School consolidates federal, state and local funds, including Title I-A, Title II-A, Title IV-A and IDEA. In order to provide Foothills with the most flexibility in implementing the strategic plan and schoolwide plan, funds are consolidated at the school level. As required, a comprehensive needs assessment is conducted annually, a schoolwide plan is written, and finally an intent & purpose statement is created to capture the intent of each program that is consolidated. Foothills follows guidelines and procedures listed in the GaDOE Consolidation of Funds Manual.

**Rank Order**

Foothills is both a LEA and one school. Rank Order does not apply to Foothills since it is considered one school.

**Carryover**

At Foothills, carryover funds are allocated by increasing the per pupil amount for the school and then consolidating the funds into the CF150 account. Carry-over funds are used to continue to meet the intent and purpose of each program while carrying out the district/schoolwide plan.

Quarterly budget sheets are monitored throughout the year and calculations are made from these near the end of the school year to determine that no more than 15% will be carried into the following year. The Federal Programs Specialist monitors spending of each consolidated program throughout the year via spreadsheets prepared by the Business Manager, listing the percentage of each program as consolidated into the CF150 budget. Projections are made based on prior monthly drawdowns. At the end of the school year, carryover information is updated and reviewed.

## **Title I, School Improvement (1003a) Grant**

**Monitoring and Oversight of School Improvement**

Foothills Regional High School conducts a Schoolwide Program. This allows all children and all parents an opportunity to have equal access to all related Title I assistance. Foothills will utilize regional leadership to build capacity and support the school improvement process should Foothills be identified as needing comprehensive or targeted support interventions. If Foothills is determined as needing comprehensive or targeted support interventions, we will be involved in school improvement efforts through the work of the RESA, and GaDOE. Regional leaders will work to implement practices that have proven effective with improving schools. Regional leaders, along with the GaDOE, will establish clear expectations for personnel as they systematically support continuous improvement at Foothills. Regional leaders will conduct a yearly evaluation of school improvement efforts. Members of regional leadership will conduct impact checks to determine the extent to which targeted school improvement efforts are implemented. The impact checks will occur regularly, will be results driven, and will be documented appropriately.

**Review and Approval of District/Schoolwide Improvement Plans**

The Foothills District/Schoolwide Plan is reviewed and updated as previously described and presented to the GaDOE for review as part of the grant submission process. When necessary and appropriate, short term action planning will be used to ensure action steps are being implemented. Any requested changes by the GaDOE will be reviewed by regional and site leaders and updates made accordingly.

**Budgeting Procedures**

If identified, Foothills will sign a Memorandum of Agreement (MOA) with the Georgia Department of Education (GaDOE). Once the MOA is signed, Foothills will complete an application for the allocation of 1003 school improvement funds and a plan of support which will include a justification of expenses that documents how the funds will be used in support of the school. Plans will be reviewed and approved by the Division of School and District Effectiveness. The Federal Programs Specialist will import the budget or aggregate of budgets into the Consolidated Application and attach the signed justification of expenses. Staff from the Division of School and District Effectiveness will review and approve budgets. Foothills leadership and GaDOE staff will remain in communication around budgeting and expenditures as the grant is expended.

### **Monitoring and Reviewing District/Schoolwide Plans**

System leaders support sites in developing, revising, implementing, and coordinating school improvement efforts during regularly scheduled site improvement planning meetings to ensure implementation of the strategic plan, district/schoolwide plan, and site-specific improvement plans. During site improvement planning meetings, data is analyzed to determine progress toward achievement goals, as well as to develop solutions to challenges related to instructional strategies, student performance around standards, family engagement, professional learning, and budgets. Additionally, site improvement facilitators meet monthly to review and analyze leading student data, using both Canvas and EOC data. Site improvement facilitators share the analysis with their site leadership team and during faculty meetings. Likewise, the results are shared with curriculum team members to ensure changes are made with instruction, curriculum, and assessment. System Leaders monitor the changes, and all available resources are used to address student needs.

### **Foothills Regional High School FY24 Designation**

#### *Comprehensive Support and Improvement (CSI) Alternative School*

Foothills has been identified as a Comprehensive Support and Improvement (CSI) Alternative School for FY24. Foothills has been identified as CSI due to its graduation rate being under 67%. Due to the nature of our school, second chance high school we struggle with graduation rate as many of our students are behind their cohort with no possibility of catching up. Foothills vision statement FRHS strives to be an accessible high-quality high school option that is flexible and responsive to the needs of the people of Georgia and its communities. Our mission is to be a community and state resource for students who want to earn a high school diploma in order to be successful in post-secondary and career options. Therefore, Foothills cohort graduation rate may be low. FY24 Foothills will fund Site Instructional Facilitators for site improvement and data analysis at each site with the objective of meeting the school goals of graduation and student achievement.

## **Education of Homeless Children and Youth & Children in Foster Care**

### **Homeless Children and Youth**

While Foothills Regional High School does not receive direct funding from the McKinney Vento Homeless Program, the school did receive funds through ARP-HCY1 and ARP-HCY2 to support the needs of students experiencing homelessness. Foothills Regional High School follows the requirements of the McKinney-Vento Homeless Education Assistance Improvements Act of 2001 to ensure that all children and youth receive a free appropriate public education and are given meaningful opportunities to succeed in our school by removing barriers.

### **Definitions**

The term *McKinney-Vento student* includes students who are otherwise legally entitled to, or eligible for, a free, public education, and who lack a fixed, regular, and adequate nighttime residence.

A child or youth is considered to be experiencing homelessness for as long as he or she is in a living situation outlined in the McKinney-Vento Act and until the end of the school year in which the student moves into permanent housing.

The term *unaccompanied youth* includes a youth not in the physical custody of a parent or guardian and who is homeless as defined by law. The more general term *youth* also includes unaccompanied youth.

The terms *enroll* and *enrollment* include attending classes and participating fully in school activities.

*Immediate* means without delay.

*Parent* means a person having legal or physical custody of a child or youth. Legal guardians are included in this term.

*School of origin* means the school the child or youth attended when permanently housed or the school in which the child or youth was last enrolled.

*Local Liaison* is the staff person designated by the Foothills as the person responsible for carrying out the duties assigned to the liaison by the McKinney-Vento Homeless Assistance Act.

## Identification

Foothills designates a local McKinney-Vento liaison. In collaboration with site personnel and community organizations, the local liaison identifies children and youth experiencing homelessness, both in and out of school, and maintains data regarding students in this situation. During the Online Registration process, students and their families are asked about their housing situation and may disclose homeless status during registration. Once a family indicates lack of fixed, regular or adequate nighttime residence on the Online Registration, a site school social worker reaches out to the family to remove barriers and offer services and supports. At any point that a student may experience homelessness once enrolled, the liaison and school social worker is notified, and supports are offered. Since all Foothills students have a mentor who communicates with them bi-weekly at least, many times a disclosure of unstable housing is made by the student to their mentor. In order to track student data and to ensure that staff offer appropriate supports, students experiencing homelessness are indicated by a McKinney-Vento “flag” in the student information system, Infinite Campus.

Annually, all staff employed at Foothills receive training on the identification and services for students experiencing homelessness through the Compliance Director annual Professional Learning platform. The local McKinney-Vento liaison also provides training for site personnel around possible indicators of homelessness, sensitivity in identifying families and youth experiencing homelessness, and procedures for forwarding information indicating homelessness to the liaison. Additionally, the local liaison sends a monthly list of McKinney-Vento identified students to each site (site directors and social workers) so that those student needs may be continually monitored. Title I, Part A set-aside funds are also used to benefit the education of students experiencing homelessness. Funds are allocated based on an annual analysis of student needs. The most common use of funds to support students experiencing homelessness at Foothills is for transportation assistance (gas cards) and access to technology (chromebooks).

Student sensitive and respectful language is used at Foothills, and therefore, this policy will not refer to children as *homeless* - it will instead use the term *McKinney-Vento student* for children and youth experiencing homelessness.

## Site Selection

Each *McKinney-Vento student* and in foster care student has the right to remain at his or her site of origin or to attend the site that serves students who live in the attendance zone in which the child or youth is actually living. Therefore, in selecting a site, *McKinney-Vento Students* and foster care students shall remain at their sites of origin to the extent feasible, except when doing so is contrary to the wishes of the child’s parent or guardian or not in the best interest of the student. Students may remain at their sites of origin the entire time they are in this situation and until the end of any academic year in which they become permanently housed. The same applies if a child or youth loses his or her housing between academic years. As a state special completion school, the “attendance zone” for Foothills encompasses RESA districts 5, 7 & 8 which greatly reduces student mobility within Foothills.

## Enrollment

Consistent, uninterrupted education is vital for academic achievement. Due to the realities of foster care, homelessness and mobility, students may not have school enrollment documents readily available. Nonetheless, the school selected for enrollment must immediately enroll any child or youth in this situation. Enrollment may not be denied or delayed due to the lack of any document normally required for enrollment.

Unaccompanied youth must also be immediately enrolled in school. They may either enroll themselves or be enrolled by a parent, non-parent caretaker, older sibling, or the LEA local liaison. If complete records are not available, IEP teams or other committees or school officials, as appropriate, must use good judgment in choosing the best course of action, balancing procedural requirements, and the provision of services. In all cases, the goal will be to avoid any disruption in appropriate services.

## Services

*McKinney-Vento students* shall be provided services comparable to those offered to other students in the school. Site personnel must also inform parents of all educational and related opportunities available to their children and provide parents with meaningful opportunities to participate in their children's education. All parent information required by any provision of this policy must be provided in a form, manner, and language understandable to each.

## Transportation

Transportation is not provided to any student at Foothills Regional High School; however, in order to remove barriers to school attendance, Foothills will provide transportation vouchers for students experiencing homelessness.

## **Disputes**

If a dispute arises over any issue covered in this policy, the child or youth will be immediately admitted to the school in which enrollment is sought, pending final resolution of the dispute. The student shall also have the rights to all appropriate educational services while the dispute is pending.

The site where the dispute arises shall provide the parent or unaccompanied youth with a written explanation of its decision, give explanation of the right to appeal, and immediately refer the parent or youth to the local liaison. The parent or unaccompanied youth shall be given every opportunity to participate meaningfully in the resolution of the dispute.

## **Credit for Full or Partial Coursework**

Students experiencing homelessness will be provided multiple educational supports so as not to cause the loss of partial or incomplete credits. The following methods will be used:

- Individual tutoring and content remediation
- Extended time for course completion
- Robust student support services
- Awarding of half and full units of credit where appropriate

## **Students Served through Foster Care**

The Foothills Regional McKinney-Vento Coordinator also tracks and monitors students served through Foster Care. Monthly, an ad hoc report is run to identify students served through Foster Care based on the SLDS information from the State Department of Family and Children's Services. Once identified as being served through Foster Care, students are flagged in Infinite Campus and information is sent to site social workers and site directors so that students are appropriately supported. Similar to students served through McKinney-Vento, students in Foster Care may be supported through transportation assistance, virtual class options, and other robust wrap-around student supports. In compliance with HB855 Foothills conducts a trauma assessment meeting for each student served through foster care who enters the school. The Foothills Trauma Informed Educational Support Plan (TIES) is developed in conjunction with the student, the family and appropriate DFCS staff. Per HB855, when a new student served by foster care enrolls at Foothills, a notification is developed by the Liaison. The liaison contacts the DFCS Region 5 Educational Support Monitor to obtain the case manager information. Then a TIES plan meeting is scheduled with the student's case worker and school staff - ideally within 30 days of enrollment.

## **Title I, Part A**

*McKinney-Vento students* are automatically eligible for Title I services, regardless of what site they attend. The school's Title I plan will be coordinated with all McKinney-Vento services through collaboration between system federal programs personnel and the local liaison. *McKinney-Vento students* will be assessed, reported on, and included in accountability systems as required by federal law and U.S. Department of Education Regulations and Policy Guidance.

## **Training**

The local liaison or designee will conduct training and sensitivity/awareness activities for the appropriate school support staff.

## **Coordination**

The local liaison shall coordinate with and seek support from the State Coordinator for the Education of Homeless Children and Youth, public and private service providers in the community, housing and placement agencies, the pupil transportation department, local liaisons in neighboring districts, and other organizations and agencies.

# **Foster Care Transportation Plan**

## **Planning**

Foothills has submitted to the GaDOE a plan to transport Foster Care Children. This plan is updated annually and developed in collaboration with the Region 5 DFCS Education Specialist Monitor for foster care children.

The Foster Care Point of Contact is the Regional Director for Student Services, who serves as support to Counselors, Social Workers, Mentors and other related staff, as well as serving as the Homeless Liaison.

Foothills Regional High School does not operate a transportation system. Foothills will provide gas vouchers if necessary for a student/family, and similarly provide public transportation passes in those communities with a public transit system.

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

Foothills is a part of the Migrant Consortium and coordinates migrant services and protocols through the Region I MEP office.

### **Records Maintenance and Transfer**

A federal programs coordinator is the authorized MEP data exchange user in the education portal on the DOE website. As the federal programs coordinator receives email notification of recently released documents, the files are accessed and acted on within one week of receipt. A federal programs coordinator collaborates with the regional registrar and updates are made within the local SIS (Infinite Campus), both on the enrollment screen for FTE/student record purposes, and with a migrant “flag” to inform teachers each time they access student rosters. A federal programs coordinator notifies site directors and counselors at each site via email as migrant students are identified and coded. The federal programs coordinator regularly reviews MEP reports: current enrollment; current participant; new participant, and regularly provides the consortium recruiter with any needed changes or updates. Current SIS reports are submitted to the GaDOE during monitoring or upon request.

The transfer of records to and from other schools, states or countries are handled at each site by the site registrar who coordinates with the regional registrar as necessary. Upon receipt of a signed records request, the site registrar secures the appropriate documents and releases them in a timely manner (i.e. - records exchange program within Infinite Campus for participating schools, standard mail, sometimes secure fax- depending on the situation). As migrant students enroll, the site registrar requests needed records from other schools, states or countries in a similar manner by having the parent/guardian sign a records release request and contacting the previous organization, usually by fax and follow up phone call. All records are maintained electronically in the SIS (Infinite Campus).

As a federal programs coordinator becomes aware of student changes (address changes, departures, etc.), the regional office and consortium recruiter are notified using the proper forms and communication.

### **Identification and Recruitment**

A federal programs coordinator receives an email notification from the regional registrar whenever a parent or guardian indicates a positive response to questions in the Online Registration System related to moves into the school for occupational reasons and the nature of such employment. A federal programs coordinator utilizes this information to help identify and recruit migrant students by faxing or emailing through the GaDOE portal to the Region I MEP Office. A federal programs coordinator and MEP Region 1 Consortium recruiter collaborate routinely and pull data from the school’s Student Information System as an additional identification and recruitment tool. The consortium recruiter then makes contact with each potentially eligible family to determine case-by-case eligibility and needs. Students who meet certain critical criteria are also identified with the assistance of the GaDOE MEP as Priority for Services. Samples of occupational surveys will be provided to auditors/monitors upon request or as a part of the cross-functional monitoring process, if we have migrant students.

## **Title II, Part A - Teacher and Leader Effectiveness**

### **Purpose**

Purpose: The purpose of Title II, Part A is to increase academic achievement by improving teacher and leader quality. Foothills transfers 100% of Title II, Part A funds into Title I, Part A.

### **Equity Belief Statement**

Foothills Regional High School believes all students should have equitable access to quality instruction. Foothills exercises flexibility with federal funding by participating in consolidation of federal, state and local funding to best serve the unique needs of students seeking a second-chance opportunity to earn a high school diploma. Foothills Regional High

School strives to recruit, prepare, train and support high-quality teachers, paraprofessionals and leaders who are adept at working with students in a non-traditional, second-chance environment. Foothills is focused on developing a district/schoolwide plan and site improvement plans with measurable objectives that will ensure that all teachers are and remain highly effective.

### **Needs Assessment**

Annually, Foothills engages required stakeholders in planning for continuous improvement. All faculty and staff including leaders, teachers and paraprofessionals are surveyed for input around continuous improvement/strategic planning. All parents are surveyed annually through the Title I annual survey as well as the Parent Climate Survey. Foothills completes a comprehensive needs assessment and seeks input from the Board. Foothills conducts meetings with parent focus groups to both identify needs and seek possible solutions/actions for improvement. The Superintendent and Board hosts an annual strategic planning meeting where stakeholders work collaboratively to review all data components, prioritize needs and revise the district/schoolwide plan to address identified needs around the five areas of continuous improvement. During this meeting, instructional strategies, parental involvement initiatives, and professional development activities are planned after a careful analysis of the relevant data. During this time, equity data and perception data are examined, and decisions are made regarding prioritized needs and equity concerns. The results of this needs assessment determine any areas of inequity and guide the development of plans and expenditure of funds.

### **Equity Plan**

The previously described process is used to guide the development of the Equity Plan which is completed and posted by the end of June of each year. Each equity indicator is rated, and summary information provided. At least one equity indicator is selected for focus and an action plan is developed to address the area of focus. The Federal Programs Specialist monitors the implementation of the Equity Plan and area of focus, while collecting the documentation required to provide evidence of effective implementation.

### **Effectiveness Plan**

This component is not required as Foothills transfers 100% of funds into Title I, Part A.

### **Professional Learning**

Professional Learning at Foothills is standards based, results-driven, and job-embedded. It is designed to improve student achievement by enhancing teacher content expertise and developing appropriate pedagogical skills for working in a non-traditional, second-chance opportunity school. Professional learning needs are assessed during the comprehensive needs assessment process. Student achievement data, graduation data, and performance data are analyzed, and desired outcomes are stated. The Federal Programs Specialist and regional and site leaders review the combined data to collaboratively develop plans for professional learning. Once plans are designed and approved, the focus becomes the implementation of quality professional learning. Evaluations of professional learning training sessions and the analysis of the evaluations are ongoing. Adjustments in content and skills to be addressed are continuous. Assessing, applying, and sustaining content knowledge and skills that educators need to improve student learning are priorities.

Professional learning will focus on increasing the ability of the teaching staff and administration to help all students achieve high academic standards and eliminate the achievement gap that separates low-income and minority students from other students. Foothills Regional High School will provide training to enable teachers, paraprofessionals and administrators to address the needs of students with different learning styles, particularly students with disabilities, students with special learning needs (including students who are gifted and talented), and students with limited English proficiency; improve student behavior in the classroom and identify early and appropriate interventions to help students; involve parents in their child's education; and understand and use data and assessments to improve classroom practice and student learning.

### **Professional Qualifications of Teachers and Paraprofessionals**

Foothills Regional High School seeks to hire qualified teachers, paraprofessionals and administrators. Vacancies are posted on the webpage for Foothills Regional High School. A job description is included as well as job requirements. This ensures that the applicants have met the minimum qualifications for professional qualifications. Foothills has broad flexibility and waives certifications for all teachers except Special Education. For teachers employed with Foothills Regional High School whose certification is waived, the minimum requirements are that each employee shall hold a clearance certificate within 90 days of employment. Qualified applicants are then eligible to interview with site directors. Site directors make recommendations to the Superintendent, who reviews each applicant and subsequently seeks



approval from the Board. The recommended and approved candidates are fingerprinted and complete other onboarding paperwork.

### **Parents' Right to Know**

Parents are informed of their rights to know the qualifications of their children's teacher. In the spring of each year, the student-parent handbook is updated to include the Parents Right to Know information. As well, the Parent Right to Know is posted on the school website. Site directors are responsible for providing a copy of the student-parent handbook containing the Parent's Right to Know to all students at their site. If the Parents Right to Know is inadvertently omitted from the student handbook, the Federal Programs Specialist will notify site directors to notify each parent of their Right to Know via 1<sup>st</sup> class mail before the end of the first week of school, or upon enrollment as Foothills has a year round enrollment policy. In this case, a copy of the notification letter will be provided to the Federal Programs Specialist.

If a student has been assigned to or has been taught for four or more consecutive weeks by a teacher who does not meet professional qualifications, parents will be provided a timely notice. All notices and information required must be in a uniform and understandable format, including alternative formats upon request and, to the extent practicable, in a language that parents understand. Parents may request and receive information regarding:

- Whether the teacher has met state qualifications for the grade levels and subject areas in which the teacher teaches.
- Whether the teacher is teaching under emergency or other provisional status.
- The baccalaureate degree of the teacher and any other graduate certification or degree held by the teacher and the field or discipline of the certification or degree.
- Whether the student is provided services by paraprofessionals.
- Parent notification is not required for the following:
  - For teachers who do not teach core academic subjects.
  - For paraprofessionals who are not highly qualified.

Any Foothills Regional High School teacher or paraprofessional who does not meet the school's professional qualifications or who holds a non-renewable certificate will have an individualized remediation plan to meet the professional qualifications or gain a clear renewable certificate. The remediation plan will be developed collaboratively with the teacher, site director and human resources director at the time of hire or when non-PQ status or non-renewable certificate is determined. All remediation plans are monitored quarterly.

## **Title III and English to Speakers of Other Languages (ESOL)**

### **Purpose**

The purpose of the state funded ESOL program is to assist students to develop proficiency in the English language, including listening, speaking, reading, and writing, sufficient to perform effectively at the currently assigned grade level. The purpose of the federally funded Title III supplemental program is to ensure that English learners (ELs) and immigrant students develop English proficiency and meet the same academic content and academic achievement standards that other children are expected to meet. Foothills does not receive Title III funding.

### **Student Assessment, Identification, and Enrollment Procedures**

Parents/guardians of all students enrolling in Foothills Regional High School are surveyed via a Home Language Survey (HLS) to determine the student's first-learned, primary, and home language(s). For students with a language reported on the HLS other than or in addition to English, eligibility for ESOL services is determined using the, WIDA Screener, or transfer records demonstrating current eligibility for language assistance services. ELs are assessed annually on the appropriate state-adopted English proficiency measure (ACCESS for ELLs 2.0 or Alternate ACCESS) to determine continued eligibility or readiness to exit English language assistance services.

The school notifies parents/guardians annually of their child's eligibility for ESOL. Such notification is made within the first thirty days of school for students continuing in the ESOL program and within two weeks of the date of eligibility determination for newly identified students. Parents/guardians have the right to decline ESOL services, as outlined in the annual notification. Upon their request, the ESOL teacher will contact the parents/guardians to ensure a clear

understanding of the services offered and the educational implications of declining participation in the ESOL program. If the parents/guardians affirm their desire for their child be removed from the ESOL program, the site will provide a waiver form. Upon receipt of a signed parent waiver, the student will be removed from the ESOL program. The site must provide language assistance services through alternate means as outlined in the school procedures for indirect language assistance services. The student remains eligible for classroom and testing accommodations and must participate in the state-mandated annual English proficiency assessment until meeting exit criteria. Parents/guardians continue to be notified annually of their child's eligibility until such time that the student meets exit criteria, and a new waiver must be collected annually. At any time, the parents/guardians may request reinstatement of ESOL services for their child.

### **Exit Guidelines**

Students in grades 1-12 who score a CPL of 5.0 or higher are considered English proficient and are exited from English language assistance services in accordance with GaDOE guidelines. As allowable under State ESOL program guidelines, Foothills also elects to exit all students in grades 9-12 who achieve an overall score of 5.0. If a student transfers into our program after they have been exited with a score of 4.3-4.9 by another district, Foothills will request the Reclassification Review letter and will honor the exit. However, these students will be closely monitored to ensure the student has in fact acquired English Proficiency.

An ESOL teacher monitors each exited student's academic performance for two calendar years following exit from English language assistance services. If an exited student transfers to Foothills during the two-year period following attainment of English proficiency criteria, the student is monitored for the remainder of the two-year period. ESOL teachers further collaborate with regular education teachers when the data indicates students may be struggling in one or more areas. If needed, additional academic supports may be implemented through MTSS. If a reasonable period of intervention and monitoring is unsuccessful and the student's difficulties appear to be related to English proficiency rather than academic deficits or disability, the MTSS team may recommend redesignating it to EL status with direct ESOL services. School leaders review and respond to the disaggregated data of former EL students.

### **Funding**

Foothills Regional High School does not receive direct funding for Title III and does not participate in a Consortium. Foothills utilizes consolidated state, federal and local funds to staff ESOL programs and purchase instructional materials, provide professional learning, conduct parent outreach, and hire the necessary personnel to ensure that the needs of English Learners (ELs) are met.

### **Professional Learning**

Every teacher of EL students, counselors, and administrators participate annually in job-embedded, ongoing professional learning relevant to ELs. The results of the annual comprehensive needs assessment guide school and site professional learning plans. ESOL teachers communicate students' current English Language Proficiency (ELP) scores to staff members and assist their colleagues with identifying appropriate scaffolding techniques and instructional strategies based on these scores.

### **Parent Outreach**

Though Foothills does not receive Title III funds, the school coordinates with Title I and hosts an Annual Title I meeting for parents of English Learners to inform parents of ways to assist their students academically, including understanding English Language Proficiency (ELP) scores as well as other assessments in which their children participate and their implications. School programs, resources, and activities are also shared with parents in these meetings, and parents are provided an opportunity to provide feedback and input. The school's Translation and Interpretation Services Plan supports schools' efforts to ensure that the activities are accessible to parents of English Learners who need assistance in another language.

The aforementioned Translation and Interpretation Services Plan guides school staff in supporting parents in need of language assistance. Upon registration, the school asks parents to indicate their preferred language for oral and written communications. To the extent practicable, communications are provided in the parent's preferred language. Resources available to assist with translations and interpretation include Language Line, a phone-based interpretation service with

over 180 language options; and school translator/interpreter (Spanish). Other services are contracted on an as-needed basis.

## **Title IV, Part A Student Support and Academic Enrichment**

### **Purpose**

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

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

### **Use of Funds**

Foothills transfers 100% of Title IV, Part A funds into Title I, Part A.

## **Individuals with Disabilities Education Act**

IDEA procedures, including those for SST, Child Find, Evaluation/Re-evaluation, Eligibility, and Discipline, can be found in Foothills Regional High School's Special Education Department Handbook.

## Appendix A: Complaint Procedures

### Grounds for a Complaint:

Any individual, organization or agency may file a complaint with the Foothills Regional High School if that individual, organization or agency believes and alleges that the Foothills is violating a Federal Statute or regulation that applies to a program under 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 that the complaint is received, unless a longer period is reasonable because the violation is considered ongoing.

### Filing a Complaint:

Complaints and grievances shall be handled and resolved as close to their origin as possible and through the proper channels using the following procedures:

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

- A statement that Foothills has violated a requirement of a Federal statute or regulation that applied 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
- 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 can be emailed to [lynn.howard@foothillsrhs.org](mailto:lynn.howard@foothillsrhs.org) or mailed to:

Lynn Howard  
Federal Programs Specialist  
Foothills Regional High School  
2415 Jefferson Road, Suite B  
Athens, GA 30607

### Investigation of the Complaint:

1. Any complaints or grievances shall be forwarded to the Federal Programs Specialist. The Specialist or his or her designee will issue a Letter of Acknowledgement to the complainant that contains the following information:
  - a. The date the complaint was received
  - b. How the complainant may provide additional information
  - c. A statement of the ways in which the Federal Programs Specialist may investigate or address the complaint
  - d. Any other pertinent information
2. The decision of the Federal Programs Specialist may be appealed to the Superintendent in writing.
3. The decision of the Superintendent may be appealed to the Foothills Regional High School in writing.
4. All decisions and appeals shall be submitted in writing.
5. Complaints will be tracked by the Federal Programs Specialist by maintaining documentation of written complaints and other supporting information.
6. Reports will be maintained with letters of complaint and the final resolutions.

**Complaint Form for Federal Programs under  
the Elementary and Secondary Education Act of 1965 (ESEA)**

**Please Print**

Name (Complainant): \_\_\_\_\_

Mailing Address: \_\_\_\_\_

Phone Number (home): \_\_\_\_\_ Phone Number (work): \_\_\_\_\_

Program complaint is being filed against:

Date on which violation occurred:

Statement that the Foothills Regional High School has violated a requirement of a Federal statute or regulation that applies to an applicable program (include citation to the Federal statute or regulation):

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 individuals who can provide additional information:

Has a complaint been filed with any other government agency? If so, provide the name of the agency.

Please attach/enclose copies of all applicable documents supporting your position.

**Signature of Complainant:** \_\_\_\_\_ **Date:** \_\_\_\_\_

Mail this form to:

**Lynn Howard**

Federal Programs Specialist  
Foothills Regional High School  
2415 Jefferson Road, Suite B  
Athens, GA 30607

## Appendix B: Tracking Form for Resolution of Complaints

### Foothills Regional High School Federal Program Tracking Form for Resolution of Complaints

Date Complaint Received	Person Receiving Complaint	Person Filing Complaint	Person To Whom Complaint Assigned	Complaint	Resolution	Date Resolved