

DuBois Integrity Academy Charter School

Federal Programs Handbook

Policies and Procedures



**2025-2026
School Year**

In addition to the enclosed policies and procedures as adopted by DuBois Integrity Academy, Inc. Governance Board, the Board shall adhere to rules, policies, and procedures as outlined in the "DIA" Charter School Contract, the Employee Handbook, and all local, state, and federal laws with regards to public charter schools.

October 2025

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OVERVIEW

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 can use the information provided to implement all federal programs accurately and effectively.

The information in this handbook will promote uniformity, effectiveness, and efficiency as federal program staff carry out their official Title duties and responsibilities. The Georgia Department of Education (GaDOE) offers Local Educational Agencies (LEAs) extensive guidance on the overarching requirements for all federal programs, along with the on-site monitoring document to ensure LEAs meet all statutory requirements of these programs. These specific requirements from the GaDOE document were used to create this handbook. It is hoped that this handbook will be helpful in assisting faculty and staff in complying with all federal program statutory requirements.

Vision

The vision of DuBois Integrity Academy is to prepare scholars who can compete globally, demonstrate citizenship, discover their purpose, and fulfill their dreams.

Mission

The Mission of DuBois Integrity Academy is to prepare college and career-ready scholars who are confident and inquisitive lifelong learners.



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LEA MONITORING OF SCHOOLS AND PROGRAMS

Federal Monitoring Process

The Georgia Department of Education requires DuBois Integrity Academy to oversee the implementation of federal programs and the expenditure of all related funds.

The specific requirements are as follows:

- The Federal Programs Director will conduct self-monitoring of the school and programs sufficient to ensure compliance with Title Program requirements, including all Federal Programs.
- The Federal Programs Director will undergo training from GaDOE and other sources to stay proficient in program compliance requirements.
- The Federal Programs Director will provide technical assistance to the LEA.
- The Federal Programs Director's self-monitoring will include reviewing all program expenditures to verify compliance with program requirements.
- The Federal Programs Director will keep all documentation the LEA may need for future audits or monitoring, according to the LEA Monitoring Form issued annually by GaDOE.
- In years when the LEA does not receive an on-site visit, the Federal Programs Director will complete the Self-Assessment Checklist and submit it to the Georgia Department of Education (GaDOE).
- The LEA will undergo monitoring by GaDOE on a four-year cycle.
- The LEA/Program Manager will participate in training and technical assistance updates provided by GaDOE before the monitoring visit.

After the on-site monitoring visit, the LEA will receive a detailed monitoring report that includes recommendations, findings, and required actions, providing an analysis of how the LEA's federal programs are implemented. If a Corrective Action Plan is necessary, the LEA or Program Manager must promptly submit it to GaDOE for approval. The appropriate Title Program Education Program Specialist will oversee the implementation of the Corrective Action Plan.

Monitoring is essential to ensure that all facets of the federal programs are being implemented as prescribed by ESEA. It is a process of systematically providing technical assistance and collecting data to provide information that can guide program implementation.

DuBois Integrity Academy's federal programs use monitoring as a regular way to observe and document activities at the Title I school. Key to this process is the feedback given to the school, which can help improve student academic performance.

Monitoring addresses the following:

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

The Elementary and Secondary Education Act (ESEA) requires the State Education Agency (SEA) to oversee the enforcement of program requirements and the use of federal funds. Georgia's monitoring process includes four main components:

- ▶ Monitoring of Expenditures - Local educational agencies (LEAs) must submit an annual budget through the Consolidated Application process for approval. Federal Program Specialists review each application and budget to ensure that expenditure is appropriate for the program area before approving LEA budgets. Once budgets are approved, Federal Program Specialists track how well LEAs are requesting funds for spending to ensure that LEAs are likely to meet expenditure requirements for federal funds.
- ▶ Single Audit – LEAs with findings are flagged for technical assistance (see procedures on audit resolution).
- ▶ On-site Monitoring – A SEA on-site Cross-Functioning Monitoring Team visits an LEA to review the criteria listed in the LEA Monitoring Form.
- ▶ Self-Monitoring Checklist – LEAs not receiving an on-site visit complete the Self-Assessment Checklist and submit it to the Georgia Department of Education (GaDOE).

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

- Selection of LEAs to be monitored
- LEAs are monitored on a four-year cycle. Approximately one-third of the LEAs are monitored each year.
- LEAs were initially randomly selected from each of Georgia's ten service areas.
- LEAs with audit or monitoring findings requiring a return of monies or receiving a high number of complaints from parents and other stakeholders, are monitored within the year of the LEA auditor monitoring report and the written complaint.

For example, if an LEA is audited in FY2023 for FY2022 and the Division receives the report of findings in FY2024 before the end of the monitoring cycle, the LEA would be included in the LEAs to receive an on-site monitoring visit. In addition, on-site monitoring outside of the scheduled cycle may be arranged as needed if LEA has evidence of serious or chronic compliance problems.

Federal Program Specialists must follow the Division protocol when conducting on-site monitoring of an LEA. The SEA maintains a copy of all documentation.

Communication and Monitoring

Monitoring the Title I school is a critical component of ensuring compliance. During the summer and after the Annual Federal Program Conference in June, the school's Federal Programs Director and/or Deputy Superintendent convene a meeting with the Executive Director, Deputy Superintendent, Director of Special Education, Principals, Assistant Principals, and Accounting Manager. All participants receive training on the policies, procedures, and guidelines for operating a Title I program.

Administrators are given detailed information on expectations and copies of program guidance. Specific training is provided in all facets of Title I. The FPCO and/or Federal Programs Director discusses the Federal Programs Handbook online and in detail. This handbook includes timelines,

budget forms, inventory information, schoolwide/targeted assistance implementation, parental involvement, fraud policy, and other areas of Federal Programs as needed. The summer meeting also includes discussions on the chart of accounts, the budgeting process, and the correlation between the budget and the Title I Schoolwide Plan. Budgets are maintained electronically by the Accounting Team and ultimately entered into the GADOE Consolidated Application for approval. The budgets are referenced when invoices, timesheets, requisitions, and professional learning forms are submitted to the Federal Programs Director for approval.

In addition to meeting with administrators, administrative staff also meet with the leadership team and Title I Parental Involvement Coordinator at the beginning of each year. These meetings are an opportunity to discuss Title I in detail and an opportunity to discuss content-specific information with each of the above. Parental Involvement staff meet regularly with the Federal Programs Director. All Title I services are supplemental. This process is monitored through ongoing technical assistance, site visits, and the budget process.

Identifying Schools for Comprehensive and Targeted Support and Improvement

The GaDOE has identified two priorities for developing criteria for identifying schools for comprehensive and targeted support and improvement (CSI and TSI):

1. Aligning its federal and state accountability systems, especially regarding identifying schools for state support; and
2. Maintain clear and straightforward entrance and exit criteria for receiving state support.

DIA does not target schools for CSI or TSI as it is one school in its own district.

Monitoring Procedures

The Title I school is subjected to ongoing monitoring by the FPCO and/or the Federal Programs Director throughout the school year. The FPCO and/or the Federal Programs Director will monitor the school on-site at least once per year to ensure compliance with Title I guidelines. Feedback will be provided to the Deputy Superintendent and Principals via checklists and descriptive information. In addition, emails, staff meetings, and phone conversations occur throughout the year as a means of providing ongoing monitoring and communication with Title I school.

Timeline for Monitoring of Title I Schools

- *June – July*
 - Attend Summer Workshop for the school following Title I state training in June to update the deputy superintendent, principals, executive director, and administrators on any new guidelines. Workshops will include the following topics: budgets, ordering, compliance, parental involvement, schoolwide programs, monitoring, academic achievement, inventory, scheduling, internal controls, ethics, fraud, waste, abuse, and corruption.

- *August – September*
 - The DuBois Integrity Academy Finance team will review budgets to ensure funds are spent in accordance with the budget and that all necessary components are included.
- *August – June*
 - Monthly meetings to include additional training as needed.
 - Inventory all items purchased by Title I.
 - The Social Worker and/or the Federal Programs Director monitors Homeless program.
 - On-going review of school improvement data and plans in conjunction with the Leadership Team.
 - On-going budgets and purchase orders are reviewed monthly by the FPCO and/or the Federal Programs Director and Accounting Manager to assist the school in spending funds as planned.
- *March – April*
 - The Annual Survey of Parent and Family Engagement is sent to parents to gauge the effectiveness of parental involvement activities. The Parent and Family Engagement Team compiles data to determine needs for the following year.
- *On-going*
 - FPCO and/or the Federal Program Director provide technical assistance and meets regularly with the Deputy Superintendent and Principals.

Data Analysis

Data is compiled, reviewed, and discussed during leadership meetings, professional learning Community meetings, and Board of Education meetings. The leadership team meets and analyzes data with the intent of improving instruction. The leadership team reviews data with instructional staff to identify and address areas for improvement.

The school provides data, in paper or electronic form, as well as past data used during the data analysis process. The leadership team convenes to delve into the data to determine root causes, by identifying the root cause of the problems that keep the school from achieving academically. School leaders discuss this information with the instructional staff to ensure they fully understand the data presented and that it is an updated school-wide plan each year.

Comprehensive Needs Assessment Process

DuBois Integrity Academy uses various data sources to inform decisions that affect student learning and teacher effectiveness. Our needs assessment process includes examining student achievement data, stakeholder survey perception data, professional learning plans, teacher recruitment and retention data, professional qualifications, and in-field data for certified and classified staff, including class size, peer walkthrough, and TKES data. Once input is collected from the school, a series of meetings is held to consider all prior stakeholder input and data and to make decisions on prioritized needs and equity concerns. Stakeholders participating in our needs assessment process include members of the administrative team, teachers, paraprofessionals, instructional coaches, counselors, parents, and community members. The results of this needs assessment identify prioritized areas of need/inequity and guide the development of plans and the expenditure of funds.

Needs Assessment Process Calendar

- January
 - Federal Program Meeting - Overview of the stakeholder planning process
 - Receive stakeholder survey links from the FPCO and/or the Federal Program Manager
 - Administer stakeholder surveys
 - Email the date for the March stakeholder planning meeting to the Federal Programs Director
- February
 - Invite school staff, parents, students, and community to the stakeholder planning meeting using a flyer, email, website, newsletter, parent app, and translated notices if needed.
 - The parent survey remains open for the school to enter responses from the paper survey.
 - Receive stakeholder survey data from the FPCO and/or the Federal Programs Director.
- March
 - Hold a school stakeholder planning meeting
 - Solicit input from stakeholders for addressing identified needs
 - Document of the meeting:
 - Sign-in sheet, including each attendee's role (parent, para, student, teacher, etc.)
 - Agenda
 - Copies of data reviewed, as well as other handouts
 - Minutes (must include details of the discussion)
- April
 - Review the following documentation:
 - Invitations to the stakeholder planning meeting
 - Invitations from the stakeholders who are participating in the planning meeting
 - The presentation of the stakeholder planning meeting
 - Sign-in sheet, including each attendee's role (parent, student, teacher, etc.)
 - Agenda
 - Copies of data reviewed, as well as other handouts
 - Minutes
 - Stakeholder input (responses to the questions in the presentation)
 - School Improvement Plan
- May
 - Continue to work on and finalize the School Improvement Plan
- June
 - The School Improvement Plan is finalized

LEA Corrective Actions

The Finance Committee will meet to review and discuss each corrective item and then implement an action plan with deadlines. After reviewing and/or revising budgets, all parties will sign off on the corrective actions. If strategies are not implemented on time, appropriate alternatives will be

recommended.

- The LEA has 30 business days to respond to any required corrective actions.
- The LEA must clearly label and attach all documentation required by the corrective action.
- If the corrective action requires written procedures, these procedures must be attached as a separate document rather than stated in the corrective action response text box.
- The program team leader monitors the implementation of the timeline for the LEA's approved correction action and recommends an appropriate alternative if strategies are not implemented on time.
- LEA's failure to correct deficiencies, as outlined in its approved written correction action timeline, could be subject to a delay of funds, at the discretion of GADOE, until corrections are made.

COMPREHENSIVE LEA IMPROVEMENT PLAN (CLIP)

CONSOLIDATED LEA IMPROVEMENT PLAN (CLIP) and SCHOOLWIDE/TARGETED ASSISTANCE PLANS (SWP/TAP)

ESEA: Sec. 1112, 1114, 1115, 1116; Sec. 1003; Sec. 1306; Sec. 1423; Sec. 122; Sec. 3116; Sec. 4105(a); Sec. 4106; Sec. 5223; Sec. 5224; Sec. 6223; Sec. 6722; Sec. 9305

Section 8305 of the Elementary and Secondary Education Act of 1965 (ESEA), as reauthorized by The Every Student Succeeds Act of 2015 (ESSA) states that a local educational agency receiving funds under more than one covered program may submit plans or applications to the state educational agency under those programs on a consolidated basis. [Source: GaDOE Federal Programs Handbook, Oct 2022].

Clip Evidence

Written procedures for creating, reviewing, and approving the S-CLIP. Before the S-CLIP can be written, the Schoolwide Plan must be written as all the data collection, evidence, and goals are identified in the Schoolwide Plan. The Schoolwide Plan then helps to determine the S-CLIP, Equity Action Plan, and Intent and Purpose. (Federal Programs Team)

Schoolwide Plan Review and Development (Federal Programs Team)

- Gather documents
 - Test data
 - Benchmark data
 - Stakeholder Survey data (August, October, January, March)
 - Monitoring data
 - Review of the previous year's SWP and S-CLIP
 - Begin by updating the SWP Comprehensive Needs Assessment
 - Academic Achievement
 - Subgroup Improvement Targets
- Based upon the review of data, goals are set for areas of weakness
- Review Mission-Specific Goals from Charter Agreement and adjust as needed
- Preparing the Schoolwide Strategies
- Verify the strategies, keeping in mind the goals of the school, the needs of the students, and the needs of all the stakeholders.
- Overview action steps for each goal, academic and charter-specific, is identified (who, what, when, where, why, and how)

- Schoolwide plan is evaluated and verify the data is being analyzed and used appropriately to increase student achievement
- ESSA requirements are reviewed and aligned with Parent and Family Engagement Policy
- The schoolwide plan development uses all pertinent data, surveys, and is verified to incorporate all federal, state and local resources
- Federal Programs Team review rough draft
- After review, adjustments are made as needed
- Final draft reviewed by Federal Programs Team
- The rest of the Traditional Fund documents are reviewed and revised for the upcoming year based upon the new Schoolwide Plan
 - Traditional Funds SWP Checklist
 - Schoolwide Plan Checklist

Once the Schoolwide Plan is ready, preparation for the S-CLIP begins.

- Family Engagement Policy is reviewed and revised based upon the stakeholder surveys and the schoolwide plan
- Equity Action Plan is reviewed for effectiveness, and new goals are set based upon the Schoolwide Plan.
- The Foster Care Transportation Plan is reviewed and revised as needed
- The Special Education Director reviews the IDEA goals. The IDEA goals are revised as needed.
- S-CLIP is reviewed and updated with information from the Schoolwide Plan and information submitted by the Federal Programs Team
- S-CLIP and supporting documents are uploaded in SLDS
- Federal Programs Director and/or the Superintendent reviews and submits to the DOE
- If an S-CLIP is unapproved, comments are reviewed, and edits are made based upon the comments. (FPCO, Federal Programs Director, Special Education Director, Deputy Superintendent, Principals)

Evidence to verify the participation of required stakeholders

Evidence for verifying the participation of required stakeholders includes emails to stakeholders with survey links and meeting invites, survey results, and stakeholder meeting agendas/sign-in sheets (FPCO, Federal Programs Director, Deputy Superintendent, Principals, Assistant Principals, Director of Special Education, and/or Federal Programs Team Member).

Evidence of CLIP Preparation

S-CLIP CHECKLIST

- Schoolwide Plan Review and Development
 - Gather documents
 - Test data
 - Benchmark data
 - Survey data
 - Monitoring data
- Review of the previous year's SWP and S-CLIP
- Update SWP Comprehensive Needs Assessment

- Academic Achievement
- Subgroup Improvement Targets
- Benchmark data

Source documentation verifying stakeholder involvement in Schoolwide Plan development

Evidence for verifying the participation of required stakeholders includes emails to stakeholders with survey links and meeting invites, survey results, and stakeholder meeting agendas and sign-in sheets. Stakeholders include but are not limited to all faculty and staff (example: administration, teachers, paraprofessional, support staff), parents and families (including parents of students with disabilities, EL students), community business partners (churches, restaurants, etc.), local and state governmental agencies (e.g., Clayton County Police, Riverdale Police, Riverdale Fire Department.)

Review and Approval Process

FPCO and the Federal Programs Director rely on the Administrative Team to conduct an annual review of the CLIP, at which time revisions are made. DuBois Integrity Academy is committed to cultivating and sustaining partnerships with parents and community stakeholders. It encourages their participation in developing, implementing, reviewing, and evaluating its Comprehensive LEA Improvement Plan (CLIP). At the school-wide parent meeting and the Spring Title I planning meeting, parents and community stakeholders are allowed to participate in developing and revising the CLIP. Once all CLIP documents have been reviewed and final changes have been made, the CLIP is submitted for approval by the GaDOE.

Procedures for Unapproved Schoolwide Plan or CLIPs

If revisions are required, the Federal Programs Director will reconvene meetings with team members to address the concerns. Prior notes, checklists, and surveys will be reviewed to address the input of stakeholders. The team will meet and revise their work until the concern is sufficiently addressed, and the Federal Program Manager can resubmit the CLIP or Schoolwide Plan.

CLIP Schedule/Timeline

To ensure timely submittal to the GaDOE, the following timeline must be followed:

- August – July
 - The newly approved CLIP is available to all stakeholders on the school website.
- February – April
 - The CLIP is made available during school Title I planning meetings, and opportunities are provided via paper and online formats for feedback. Survey responses will be collected as part of the annual Comprehensive Needs Assessment.
- March – June
 - A system-wide parent meeting is held to gather final input on the CLIP.
- May – June
 - Changes are made to the CLIP based on feedback.
 - The CLIP is uploaded for GaDOE approval.

Parent and Family Engagement

All stakeholders (parents/families, community members, business members, faculty, and staff) are invited to participate in at least two meetings to provide input on the Family Engagement Policy, the School-Parent Compact, and School Staff Capacity. In addition to these meetings held at least twice a year, there is a survey available on the Federal Programs page of the DuBois Integrity Academy website, where parents can submit suggestions or comments throughout the year for the Parent and Family Engagement Policy, the Schoolwide Plan, and S-CLIP.

The primary way we communicate with parents is through email. Parents also get flyers sent home with each student for all parent meetings. Meeting documentation includes PowerPoint presentations (which contain the agenda), sign-in sheets for in-person meetings, and screenshots of attendees for virtual meetings.

All parent meetings include a survey that reinforces the information shared at the meeting. The survey results help shape the Parent and Family Engagement Policy and School-Parent-Student Compact. Surveys are the secondary way to communicate with parents.

All parents are emailed the following documents at the beginning of the school year:

Annual Title I Schoolwide Plan, School-Parent-Student Compact, Family Engagement Policy, Right to Know, August Stakeholder Survey, DuBois Integrity Academy Parent Volunteer Interest Survey.

Parents can view and download all these documents during Open House, which is held on the Saturday before school starts. All these documents are available for review on the DIA's website, and a poster with a QR code for each document is located in the front office at each location.

Parents receive an invitation to the Annual Title Meeting via email and a flyer is sent home with each student at the start of every school year. This includes a link to a survey for the Annual Title I Meeting.

Parents are sent a Building Staff Capacity survey link in November/December and in April/May.

Parents are sent an invitation to the School Parent Compact Meeting and a link to the January Survey by email and by a flyer sent home with each student in the first week of January. This includes a link for a survey for the School Parent Compact Meeting.

Parents are invited to the Family Engagement Policy Meeting and to the March Survey via email and a flyer sent home with each student in the first week of March. This includes a link for a survey for the Family Engagement Policy Meeting.

Members of the Federal Programs Team review all Parent and Family Engagement documentation and ensure procedures are followed accordingly.

DuBois Integrity Academy receives more than \$500,000 in Title I funds; therefore, 1% is set aside for parent and family engagement.

Distribution of Family Engagement Documents

The following documents are displayed during the open house before school begins and emailed to parents in the first month of school. All these documents can also be found on the DIA's website, and a flyer with QR codes is posted in the front office(s).

- Annual Title I Meeting PowerPoint
- Schoolwide Plan
- School-Parent Compact
- Family Engagement Policy
- Right to Know
- Stakeholder Surveys
- DIA Parent Volunteer Interest Survey

Parent and Family Engagement Checklist

July

- Building positive relationships with parents
- Reminder of parent communication
- Tips for parent conferences
- First contact all parents by inviting them to the open house
- How to let parents know about opportunities to volunteer
- Need copy of agenda and sign-in sheets

Open House

- Family Engagement Policy
- Schoolwide Plan
- Right to Know
- School-Parent Compact (also send home in beginning of year documents)
- August Stakeholders Survey
- DuBois Integrity Academy Volunteer Survey
- QR Code Quick Links to all Federal Documents

August

- Family Engagement Policy
- Schoolwide Plan
- School-Parent Compact (also send home in beginning of year documents)
- August Stakeholders Survey
- DIA Parent Volunteer Survey
- Annual Title Meeting

September (Annual Title Meeting- Date TBD)

- Agenda needs to include
- Family Engagement Policy
- Compact
- Schoolwide Plan goals
- Partnership (capacity) between parents and school/faculty
- Test data
- How to volunteer
- Contact information
- Record zoom session and screenshot attendees
- Identify the roles of the attendees

October (Administration Meeting Family Engagement update)

- Include agenda, handouts, sign in sheets with roles
- Make sure everything is appropriately dated

November (November Stakeholder Survey)

- Get input on how things are going

- What can we do to help?
- Keep focusing on academic

December

- Disaggregate data from November survey
- Handouts to teachers with information about parent communication, documenting parent communication, parent-teacher conference tips (retention meeting to start in January), include reminder to get interpreter if one is needed

January (Pre-planning Faculty meeting)

- Discuss expectations for parent-teacher meetings
- Reminder of parent contact communication documentation
- School-parent-student compact
- E-mail home with Compact Meeting flyer
- Send home flyer invite
- School-Parent-Student Compact Meeting
- Review of the school year thus far
- Include upcoming events
- Review of schoolwide goals
- Include upcoming events
- Discuss compact and purpose of compact
- Ask for input for the compact by completing the survey
- Record zoom session and screenshot attendees
- A rough draft will be made available to parents; final draft will be available and sent home at the beginning of the school year

February (Disaggregate Data)

- Disaggregate data from Compact Survey
- Survey results
- Share survey results with parents in the rough draft of the compact

March (Family Engagement Policy)

- Email home with policy meeting flyer
- Send home flyer invite
- Review of the school year thus far
- Include upcoming events
- Review of schoolwide goals
- Discuss policy and purpose of policy
- Ask for input for the policy by completing the survey
- Record zoom session and screenshots attendees
- Identify the roles of the attendees
- A rough draft will be made available to parents; final draft will be available by June and will be sent home at the beginning at the school year

April (Parent Volunteer Opportunity)

- Parent volunteer opportunity as proctors during Milestone testing
- Parent volunteer opportunity for end of year activities (field day, class parties, etc.)
- Reminder to faculty of parent communication as we finish up the school year
- Parent communication
- Disaggregate data and complete rough draft of policy

May (Family Engagement Policy)

- Finalize Parent and Family Engagement Policy
- Finalize School-Parent Compact
-

SERVICES FOR HOMELESS CHILDREN AND YOUTH (MCKINNEY VENTO & ARP-HCY)

Procedures for The Education for Homeless Children and Youth

ESEA: Sec. 1112 (a)(1) and (O); MV Sec. 722(g)(B); 722(g)(3)I; 722(g)(3)(C); 722(g)(1)(F)

DuBois Integrity Academy seeks to ensure that each homeless student has equal access to the same free appropriate public education as required by federal law. The McKinney-Vento Homeless Assistance Act (Act), 42 U.S.C. § 11434a (2) et. Seq., identifies homeless students as those who:

- Lack a fixed, regular, and adequate nighttime residence.
- Share housing with others due to losing housing, financial struggles, or similar reasons; stay in motels, hotels, trailer parks, or camping grounds because there are no other suitable options; stay in emergency or transitional shelters; are abandoned in hospitals; or are waiting for foster care placement.
- Have a primary night-time residence that is a public or private place not intended for or typically used as a sleep area for people.
- Live in cars, parks, public spaces, abandoned buildings, substandard housing, bus or train stations, or similar locations.
- Are migratory and live in the conditions described in Items 2, 3, and 4 above.

Identification: At the beginning of each school year, McKinney-Vento paperwork is sent home with the student's beginning-of-year documents. Parents who fall into the listed categories complete and return the paperwork to DIA. This document is also provided to any new students who enroll after the beginning of the school year.

Selection: Once the forms are returned, the Social Service Liaison identifies those who need assistance, labels the student(s) appropriately in DIAs Student Information System, and contacts the parents to assist with additional services that may be needed.

Enrollment: All students are accepted into DIA through a Lottery process. DIA is one school; McKinney-Vento paperwork is completed at the time of enrollment or if a student has already been enrolled at DIA. Upon receipt of the McKinney-Vento paperwork, the Social Worker will follow the policy and procedures in place for homeless students and families.

DIA will provide transportation to students experiencing homelessness. In addition, DIA will also provide McKinney-Vento eligible families with a gas gift card as needed when school is in session.

DIA required sports participation fees will be waived for McKinney-Vento eligible students who are interested in participating in DIA sports and are selected by the coach.

General school supplies (e.g., poster board, book covers, pens, uniforms, and shoes) will be provided to McKinney-Vento-eligible students. The grade-level counselor will let the teachers know that, if supplies are needed, the teachers should request them through the grade-level counselor, who in turn communicates with the Social Worker and Executive Director.

If parents have a dispute regarding homelessness, they should contact the Social Worker to schedule

a meeting to discuss the issue. If the parents are still concerned, the parents may request a meeting with the Deputy Superintendent, Principals and/or the Executive Director within five business days of the meeting with the Social Worker. If the parents feel the issue still has not been resolved, the parents may file a dispute with DIA's Governing Board within five business days of the date of the meeting with the Deputy Superintendent, Principals and/or Executive Director. The parents shall be provided with a written explanation of the school's decision, including the right to appeal.

Homeless students work with the Social Worker and Counselors to ensure the student is on track. If deficiencies are discovered, the Social Worker works with the student to determine a course of action to get the student back on track.

In accordance with the McKinney-Vento Homeless Assistance Act, DIA will work with homeless children and their families to provide stability in attendance and other areas. DIA is discreet with the information about the student(s)' status to ensure the students are not stigmatized or segregated. Students identified as homeless receive all services they are entitled to without considering their housing status.

Records Evidence

DIA is one school. If DIA has any homeless students, the list of those students is maintained by the Social Worker, Counselor(s), Deputy Superintendent, Principals, Executive Director, and/or Federal Programs Director.

FIDUCIARY RESPONSIBILITY

Maintenance of Effort

GADOE compares the fiscal effort of the preceding year to the second prior fiscal year and makes the maintenance of effort determination available to the system through a marked "met" or "unmet" on the consolidated application. Documentation for Maintenance of Effort (MOE) is only required for LEAs that do not meet the required MOE. The Federal Programs Director will download the MOE information from the Consolidated Application each school year for documentation purposes (ESSA Sections 1118 and 8521).

Attendance Area Determination

DuBois Integrity Academy is one school; therefore, it is its own LEA. This also means attendance area determination is not needed to establish rank order. As a State Charter School, DuBois Integrity Academy is permitted to waive the eligible school attendance area.

Eligible Attendance Areas: The GaDOE Eligible Attendance Area Worksheet is used to calculate the previous year's enrollment (from the October FTE Count) and free or reduced lunch/CEP status. Attendance area determinations are computed using the previous year's October FTE count of children eligible for free/reduced-price meals or Community Eligible Provision (CEP) direct certification numbers under the Healthy Hungry-Free Kids Acts of 2010, HHFKA Section 11(a)(1)(F), of the Richard B. Russell National School Lunch Act and the October FTE enrollment report. These

numbers are placed in the attendance area determination worksheet provided by GaDOE and are then ranked from highest to lowest percentage free/reduced lunches/CEP counts. This number is multiplied by the 1.6 multiplier to give the percentage of directly certified students. School-wide schools, currently at 40%, or that have been a school-wide program and remain above the 35% rate, are served. DuBois Integrity Academy is identified as a Community Eligibility Provision CEP school.

ALLOCATIONS AND CARRYOVER

Allocations

After receiving notification of Title I, Part A grant and other federal amounts from GADOE, required set-asides in each budget are set aside for required components such as parent involvement and homeless students.

Procedures for Determining Carryover

The Federal Programs Director tracks the spending of each program through the year via budget sheets. At the end of the school year, carryover information is updated and reviewed. Currently, DuBois Integrity Academy has never needed to have funds carried over into the next fiscal year. In the event that carry over becomes necessary funds would be redistributed based on GaDOE criteria as listed in the Title I, Part A Handbook.

Allowability

Any purchases made with Federal Funds must follow the guidelines for allowable cost. DuBois Integrity Academy will follow guidelines as detailed in Edgar, 2CFR Part 200 and the Title I LEA Handbook for Georgia for any Title, IDEA, ESSER or other federally funded grants. The Federal Programs Director will forward any questionable expense to the GaDOE Area Program Specialist for further clarification before granting approval. As part of ongoing technical assistance, the Federal Programs Director provides training and guidance through emails, meetings, and phone calls with the Deputy Superintendent and Principals on allowability principles, including the requirement that all expenditures must be aligned with needs identified in the School-Wide Plan and the program's purposes for improving the achievement. Training should be verified via sign-in sheets and/or attendance sheets or if virtual, system sign on log. DuBois Integrity Academy currently utilizes traditional budgeting with their School-Wide Plan, therefore expenses must be budgeted and aligned with the overall School-Wide Plan.

EXPENDITURE OF FUNDS

The Federal Programs Director will prepare a written report of the preliminary Federal Programs budget once this information becomes available from GaDOE. The report is submitted to the executive director and the budget team. All approved Consolidated Application budgets for all federal programs will be presented to the Governance Board by the executive director once the GaDOE approves them. The Federal Program Manager will maintain copies of the meeting agenda, minutes reports, and approval.

All federal grant budgets and the CLIP must be approved by the Superintendent and Federal Programs Director after GaDOE approves the final submitted budget application. Additionally, any significant amendments must be approved by the Superintendent. Each federal program must be identified, and budget details must be listed.

The approval process for federal budgets is as follows:

- Funding amounts are approved by the GaDOE Board of Education
- Award letters are sent to the districts
- The school is given the allocated dollar amount for budgeting
- The budget is entered into the GaDOE Consolidated Application (electronic grant application process)
- The budget is approved by the program coordinator
- The budget is approved by the GaDOE Program Manager (the budget may be rejected at this level, and requests for revisions may be made)
- The budget is approved by the superintendent (the budget may be rejected at this level, and requests for revisions may be made)
- The budget amount is approved by GaDOE Accounting
- The budget is adopted by the DuBois Integrity Academy Governance Board
- The Federal Programs Director and Accounting Manager monitors the budget and expenditures monthly to ensure accuracy and the reconciliation of discrepancies.

Federal Programs Expenditures are allowable, necessary, and reasonable and conform to all applicable laws, regulations, and guidance, are consistent with local policies, supplemental in nature, adequately supported by source documentation, and occur within the period of performance. The executive director ensures adherence by signing off on all purchase orders prior to items being ordered.

Federal Programs Expenditures follow procurement standards: maintain oversight of expenditures (including contracts), avoid conflicts of interest, and comply with federal, state, and local standards and policies related to competition and procurement. The Executive Director ensures that the procurement standards are adhered to.

Expenditures adhere to financial management standards: require segregation of duties in review and authorization, and, if necessary, the reconciliation of costs and charges to the program.

Budget Amendments

Due to the high bar for supplanting in Title budgets, amendments must be submitted for any requested change to an approved budget. LEAs must submit budget amendments for any award changes (reduction or increase) or any changes to the original approved budgets that exceed 25% in any function code using the LEA-consolidated application process. The Federal Program administrators are encouraged to contact GaDOE's Federal program staff for specific details in submitting budget amendments. A best practice is to submit an amendment before the completion reports to ensure allowability in advance.

After the LEA submits a completion report, GaDOE calculates official carryover funds. LEAs are notified regarding the exact amount of carryover funds and must submit a budget amendment using the approved process. The GaDOE must approve the amended budget/consolidated application before funds are expended.

INTERNAL CONTROLS

Purchasing and Expenditures

- A. Accurate records of all transactions shall be kept and reports on expenditures shall be given to the Governance Board on a monthly basis.
- B. Purchases over \$1,000 shall be recorded on a purchase order form. All purchase orders forms must be approved by the Executive Director or designee prior to being ordered.
- C. Payments will be issued against invoices only and not quotes or purchase orders. Invoices must be attached to a purchase order requests for payment or a Statement of Work (SOW) when they are outside of the operating budget.
- D. Copies of all purchase orders shall be maintained on file and shall be matched to the order when items are received. All packing slips shall be verified against purchase orders when items arrive.

Check Signatures

- 1. Operating Accounts – All purchases outside of normal operations, i.e., mortgage, rent, payroll checks, etc., over \$25,000 will require any two of the named authorized signers. No check may be signed by an individual who is also the payee.
 - Chair of the Governance Board, Treasurer of the Governance Board, Governance Board Vice Chair, Governance Board Secretary or Governance Board Designee, as approved by the Governance Board by a majority vote.

If paid via bill pay and the invoice is over \$25,000., two board members must sign A “Payment Authorization” request or submit their approval via email.
- 2. Internal Accounts – All internal funds checks must be signed with one of the above, (1) signature. No check may be signed by an individual who is also the payee.

Contracts

1. Consultant Agreements

The deputy superintendent and principals may request the services of consultants to provide training and advisory services, so long as such amount is in accordance with the school's annual budget and approved by the Executive Director. Travel and expenses for consultants may be paid in accordance with the Travel and Transportation Fees Policy. No payment shall be made to the consultant until all services and supportive documentations have been completed.

2. Other Agreements

All other agreements for services shall be approved by the Governance Board. The Executive Director or designee shall conduct an annual inventory evaluation of all property owned or leased by the school.

3. Expenditures

Expenditures from school funds shall be based upon the annual budget. The Governance Board shall be notified of expenditures not included on the annual budget or of expenditures that have exceeded the amount budgeted. All expenditures shall be paid by check, bill pay or online ACH, unless specifically authorized to utilize other methods such as DIA credit card. The exception is expenditures paid from petty cash according to the Petty Cash policy.

Drawdowns

DuBois Integrity Academy drawdown requests are consistent with the Department's DE0147 and are supported by accounting records of outlays (expenditures) prior to the request. Drawdowns are based on actual expenditures.

DuBois Integrity Academy utilizes traditional budgeting for its federal funds, including Title and IDEA. Once the Governance Board votes on the general budget, the schoolwide budget is extracted from the general budget into the schoolwide budget supported by the Schoolwide Plan. The SWP budget is determined and calculated based on the LEA's Schoolwide Plan. The drawdowns are based on monthly expenditures, and a spreadsheet of those calculations is maintained by the Finance Department, supported by the applicable GADOE Chart of Accounts. All expenditures must be properly identified using the full GADOE accounting principles, identifying each proportionate share of State and local funds, Title (Title I Part A, Title II, Title IV), and IDEA (611 & 619). All set-aside funds for Title I Part A and the Homeless will be maintained separately and identified appropriately.

The monthly drawdown process is as follows:

- The Director of Federal Programs and/or Accounting Manager will be responsible for drawdown calculations. Drawdowns are based on actual monthly allowable expenditures and are reviewed with members of the Finance Team. The Accounting Manager determines that expenditures are calculated accurately by each Federal Fund Award.
- The Director of Federal Programs, Accounting Manager, FPCO, Executive Director, and Accounting Team meet regularly to discuss expenditures (monthly at a minimum).
 - ❖ Drawdowns are processed monthly except for the first three months of the Fiscal School year. The first draw is processed in November for August, September, and October of the current school year. Each time the GADOE makes an adjustment to one of the federal funds (increase or reduction), the calculations are readjusted across the board for each monthly calculation, and future drawdowns and allocations are adjusted accordingly.
 - ❖ The Federal Program Director, Accounting Manager, Executive Director, and the Accounting Specialists meet monthly to ensure that expenditures are allowable and accurate based on the budget.
 - ❖ The Federal Programs Director completes the request for funds drawdown and submits it to the Executive Director.
 - ❖ The Executive Director approves the request for the drawdown and submits it to the

Federal Programs Finance Officer.

- ❖ The Federal Programs Finance Officer submits the drawdown to GaDOE.
- ❖ The Accounting Team makes journal entries. (Note: Journal entries may be recorded after each draw or at the end of the year, ensuring that fund 150 balances to zero.) The Accounting Team maintains all calculations. Additionally, the Federal Programs Director and/or the Accounting Manager keeps a log/spreadsheet detailing the percentages drawn down to date.
- ❖ The Federal Programs Finance Officer, Federal Programs Director, and/or the Accounting Manager prepare the completion reports at the end of each grant period to close out the grant and submit them to GaDOE. A spreadsheet identifying the specifics of the completion report will be completed by the Federal Programs Director and signed off by the Accounting Manager and Federal Funds Finance Officer, with final approval by the Executive Director.

Procurement Process

The Federal Programs Director, Accounting Manager, and Executive Director are responsible for ensuring that the federal programs budget is closely followed when items are requested and purchased. The Executive Director will approve the purchase request and purchase order if the goods and/or services comply with the federal program. Approval of the request requires comparing the purchase to the approved budget and program guidelines. The Accounting Manager will ensure that the purchase is allocated to the appropriate GaDOE accounts deemed allowable within the budget. If the purchase is classified as a capital expense, the Federal Programs Director must obtain additional approval from the GA Department of Education to document its allowability. After the purchase request and order are approved, the purchase is finalized. The Director of Operations is responsible for receiving the goods and notifying the Federal Programs Director.

The procurement process consists of a team that includes the Executive Director and department leaders in the relevant areas of expertise based on the goods, products, or services to be purchased once the need is identified, such as curriculum or technology.

DuBois Integrity Academy's Conflicts of Interest Policy specifically prohibits any board member or employee from participating in the selection or awarding of a contract to procure goods or services if a real or apparent conflict of interest exists.

To ensure open competition, the district uses the following procedures for procuring equipment, supplies, and contracted services (2 CFR §200.319(c) and 2 CFR§200.320(d)(3)):

- Sole source vendors are individuals or companies with specialized knowledge, skills, or products for which no comparable alternative exists. A sole vendor document will accompany the source expenditure documents when applicable.
- A sole document will accompany the source expenditure documents when applicable.
- For micro purchases of goods and services up to \$3,000 (individually or in aggregate), where there is no sole source vendor, the Federal Programs Director has the discretion to recommend the purchase without soliciting additional quotations or conducting Internet searches (2 CFR §200.67, 48 CFR Subpart 2.1);
- For goods and services between \$3,501 and \$150,000 (individually or in aggregate), where there is no sole source vendor, at least two written quotations must be solicited, or at least two Internet searches for comparable products must be conducted before the approval of the purchase (2 CFR §200.320);

- For goods and services exceeding \$150,001 (individually or in aggregate), the sealed bid process outlined by system procedures will be used.
- In accordance with 2 CFR §200.320, competitive proposals are required for goods and services exceeding \$150,000.

Emergency Purchasing Policy

DuBois Integrity Academy's emergency purchasing policy suspends normal competitive bidding rules during a declared emergency to allow for the immediate procurement of goods and services to protect public health, safety, or welfare. DIA must still follow its published financial policies, which require the purchase requisition to be clearly labeled "EMERGENCY". While DIA governance board approval is not required for the initial emergency purchase, district-level approval (e.g., from the superintendent) and subsequent board-level notification or approval for longer contracts are still necessary.

Key aspects of the policy

- **Definition of an emergency:**
A situation creating an immediate threat to public health, welfare, or safety, such as natural disasters, epidemics, or equipment failure.
- **Suspension of rules:**
During an emergency, the requirement for competitive bidding is suspended to allow for rapid response.
- **DIA board-level approval:**
DIA Board-level approval is not required for the initial emergency purchase. However, the state Department of Administrative Services (DOAS) recommends notification and is available for support.
- **District-level approval:**
The superintendent or a designee must declare the emergency purchase. The purchase requisition must be clearly labeled "EMERGENCY" and signed by the appropriate department head.
- **Subsequent approval:**
Emergency contracts lasting more than 12 months require specific approval from the DIA board.
- **Documentation:**
DIA must clearly document the need for the emergency purchase.
- **State vs. District rules:**
Districts must adhere to local purchasing policies and state thresholds for emergency purchases, while also meeting the requirements of the emergency policy.

Important considerations

- Poor planning or the impending expiration of funds are not considered valid justifications for an emergency purchase.
- Emergency purchases should be made at the least cost to the school district under the circumstances.

Conclusion and Adjustment to Procurement

Based on the above-listed circumstances, DuBois Integrity Academy amended its Procurement process to include the following:

- 1) Negotiate or renegotiate contracts for services or products based on current and former relationships established with Service Providers & Supply Chains.
- 2) Quotes instead of RFPs will be accepted for products under \$250k

- 3) Utilize markets that provide online internal marketing in real time, i.e., Amazon Marketplace.
- 4) Rely on previous procurement evaluations and decisions.
- 5) Recommendations from tried-and-true companies.

Procedures for Sealed Bids/Competitive Proposals

- An invitation to bid/Request for Proposal (RFP) will be placed on the system website and in the county's legal organ.
- The invitation to bid/Request for Proposal (RFP) will include a description (characteristics and specifications) of the goods or services to be provided, requirement the offer or must fulfill; factors to be used in evaluating the bid or proposal; date and time of the public bid openings.
- As bids are received by the designated system representative, they are dated and stamped.
- At the appointed time, bids will be publicly unsealed and the results recorded by the designated system representative.
- The Executive Director and Director of Operations, will evaluate all bids/Requests for Proposal (RFP) received by the designated due date. For sealed bids, the evaluation will be comprised of a price analysis comparing the values of similar products, goods, and services to determine the reasonableness of the bids. For competitive proposals, all submissions will be evaluated using a rubric provided to vendors as part of the RFP package.
- After a price analysis, the Director of Operations will submit to the Executive Director for Governance Board approval the recommended bid/proposal.
- Following board approval, a letter summarizing the results will be sent to all offerors.
- A firm fixed price contract award will be made in writing to the lowest responsive and responsible bidder.
- Vendors who wish to protest the results of the process must do so in writing

Noncompetitive Proposals

Procurement by noncompetitive proposals is procurement through solicitation of a proposal from only one sole source and may be used only when one or more of the following circumstances apply (2 CFR 200.320(f)).

- The aggregate dollar amount does not exceed the micro-purchase threshold
- The item is available only from a single source
- The public emergency for the requirement will not permit a delay resulting from publicizing competitive solicitation
- The federal awarding agency or pass-through entity expressly authorizes noncompetitive proposals in response to written requirements from non-federal entity
- After soliciting a number of sources, competition is determined inadequate

Verification for Suspension Debarment

- The Accounting Manager and/or The Federal Programs Director ensures that no vendors from whom DuBois Integrity purchases goods and services are listed on the website sam.gov as being suspended, debarred or otherwise excluded from or ineligible for participation in Federal programs or activities. The Executive Director immediately notifies the person who originated the purchase order in order for another vendor to be selected (2 CFR §180.25(a))

and 2 CFR §200.213).

- 2 CFR 180.220 Procurement contracts included as covered transactions include any contract or subcontract expected to equal or exceed \$25,000 must be checked against the system for Award Management (SAM) for suspension or debarment. Evidence of the verification include a date/time stamped print screen (requires a SAMS user account) or a signed and dated copy of the screen, and person responsible for checking.

Verification of Vendors Not Registered in Sam.gov

Verification for vendors not registered in Sam.gov will be searched through SAM.gov “Exclusion” listing. The SAM.gov Exclusions extract contains a list of all currently active exclusions in SAM.gov. These include exclusions for:

- ❖ Individual: A person without a valid Unique Entity ID
 - ❖ Firm: A company with a valid Unique Entity ID
 - ❖ Special Entity Designation: Any entity that is not a Vessel, Individual, or Firm
 - ❖ Vessel: A mode of transportation capable of transport by water.
- The exclusion record will identify parties excluded from receiving federal contracts, certain subcontracts, and certain types of federal financial and non-financial assistance and benefits. Exclusions are also referred to as “suspensions” and debarments”.
 - Verifications that the entity has no active exclusions:
 - ❖ Verifications will be printed and downloaded to include the date in the header or footer, and the exclusions area showing no active exclusions will be on the printout.
 - The LEA will collect a certification from the vendor/person to ensure they have not been suspended and/or debarred.

EXPENSE STATEMENTS FOR FEDERAL FUNDS

Travel

In order for travel to be reimbursed, the person seeking the reimbursement must have prior approval for the travel. DIA’s Professional Learning Request Form must be completed and approved by the Deputy Superintendent and Executive Director prior to the travel taking place. Each person seeking his reimbursement must complete the Travel Reimbursement Form after the Travel has taken place. This form adheres to the state mandated amounts for meals and gas mileage. The receipt must complete the form with beginning and ending gas mileage and cannot exceed the allowable amounts for meals. The same forms are required for conferences and must fall within appropriate cost guidelines. The recipient must then return these completed forms along with evidence of the professional learning attended. These forms will be approved/disapproved by the Deputy Superintendent and Executive Director and forwarded to the Director of Finance for payment. Travel costs must be reasonable and consistent with DIA’s written policy or follow GSA 48 CFR 31.205-46a.

Mileage

Mileage allowance is the current state mileage reimbursement rate per mile from work location to workshop/conference and return. This rate is subject to change. Odometer readings and the vehicle license number are required. Parking fees at conference sites are reimbursable but require a receipt.

Meals

Meals are reimbursed at \$13 for breakfast, \$14 for lunch, and \$23 for dinner. Travel regulations will be revised as needed to be in line with allowable rates as established by the Statewide Travel Policy/GaDOE. *Travel must be more than 12 hours and 50 miles to claim meals.*

- Lunch is not reimbursable when the meal is included with the conference.
 - ❖ The daily rate for meals is 75% of \$28 or \$36 on the day of departure and return and the whole rate for days in between (a conference, for example).

Lodging

Lodging expenses may be reimbursed; however, taxes are not. Hotel receipts must be attached to the expense statement. *When registering for lodging the employee should claim exemption from the local hotel sales tax.* The appropriate form is available from the Business Office in paper form. Failure to submit the form at registration will result in the employee having to pay the hotel tax.

Secure Approval

An administrator must sign the employee expense statement before it is submitted to the Accounting Manager. Agendas must be attached to expense statement; Federal Funds (Title I, Title II) will not reimburse for meals if the meals are included as part of the conference registration. If the employee requires a special diet it is their responsibility to notify the conference of the special dietary needs.

Timeline for Approval and Payment

All expense statements should be submitted to the Accounting Manager within 30 days of the time the expense occurred. When this time frame is followed, expense checks are distributed within 30 days. Expense statements received after 30 days may be declined for payment.

*If an expense statement is not completed correctly, it will be returned to the employee.

Professional Learning Stipends for Federal Funds

Stipends funds are awarded by DIA to certified personnel and paraprofessionals for having successfully completed learning opportunities that have occurred at any time during the fiscal year outside of the employee's normal contract and/or work hours.

- Compensation for work on an award for performance for allowable activities.
- Must be reasonable and necessary to the federal program
- Stipends may be awarded only if the following conditions exist:
 - ▶ There is evidence that the knowledge, skills, practices, and dispositions gained from the professional learning activity are aligned to an approved individual plan, or a school or LEA initiative and/or product, and/or specific goals; and
 - ▶ There is evidence that the knowledge, skills, practices, and dispositions developed through participation in, or facilitation of professional learning have been implemented/demonstrated in the classroom/work setting; and
 - ▶ Participation occurs beyond regular contract hours, days, or school year.
 - ▶ State and federal funds designated for professional learning shall not be used to pay stipends to school board members or to school council members who are not employees of the LEA.

- The request for Stipend must be included as part of the professional development needs outlined in the school improvement plan.
- Teachers must complete the request for Professional Leave form and send to the administrator at least 10 days prior to the professional learning activity.
- Once the professional learning activity is completed, the Deputy Superintendent and/or Principals sends the sign-in sheets, agenda, and individual requests for stipend agreement to the Executive Director.
- The Deputy Superintendent and/or Principals will also send a list of all participants and the amount due to each.
- Teachers and administrators may retrieve all necessary documents from the Accounting Manager.

The LEA will follow the SBOE Rule 160-3-3-.04.

Memberships, Subscriptions, and Professional Activity Costs

- A. Costs of the non-Federal entity's membership in business, technical, and professional organizations are allowable.
- B. Costs of the non-Federal entity's subscriptions to business, professional, and technical periodicals are allowable.
- C. Costs of membership in any civic or community organization are allowable with prior approval by the Federal awarding agency or pass-through entity.
- D. Costs of membership in any country club or social or dining club or organization are unallowable.
- E. Costs of membership in organizations whose primary purpose is lobbying are unallowable. See also §200.450 Lobbying.

Consultants, Contracts, Purchased Services for Federal Funds

Contracts are required for all consultants and purchased contract services. The Federal Programs Director uses the website System for Award Management (SAM) for verification of potential contractors if the contract is \$25,000 or greater. A value of "Yes" for Delinquent Federal Debt indicates the LEA cannot use federal funds to pay this entity for contracts/orders.

Each contract contains the following:

- Contracts are generated by the Executive Director.
- Specific duties are specifically spelled out for each contract.
- The person must also submit to be fingerprinted if they are working with students.
- The contract includes the number of hours to work and the rate of pay agreed upon by the consultant or contract service teacher.
- Principals must submit the time logs based on the payroll deadlines from the Payroll Department.

Verification of Work

The FPCO and/or the Executive Director provides oversight in ensuring that all contractors' work is complete. Artifacts, daily sign-in sheets, and completion of all workshops are kept on file in the Business

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

Periodic Certification

Fully-funded federal personnel must submit an assurance (Periodic Certification Form) yearly documenting that they spent 100% of their time on federal program-related activities (2 CFR §200.430(i)(1)(i, vii)).

Supplement Not Supplant Procedures

Federal funded expenditures are supplemental to schools' budgets. Personnel are in addition to the number required to meet maximum class size as determined by GaDOE. Federal funds, except for ESSER grants, are only used to supplement and to the extent practical, increase the level of funds that would in the absence of federal funds be made available from non-federal sources for the education of students participating in federal programs. Title I funds are not used to take the place (supplant) of local, state, or other federal funds and are not provided to participating Title I children when the same services are provided to non-Title I children with non-federal funds. Conversations regarding supplement vs. supplant are held quite often throughout the year. The programs/activities provide supplemental services to programs that are required by federal, state, and local law. Federal funds do not support programs that were paid with state or local funds unless there has been evidence of precipitous decline. DuBois Integrity Academy leaders are made aware of the supplement and supplant issue during the summer training. The Executive Director, Director of Business and Federal Programs Director Affairs reviews budget requests to ensure that supplanting is not taking place.

Title II and Title III uses the follow questions to ensure that programs are supplementing, not supplanting:

Respond "NO" to the following questions:

1. Would other monies from the state, or other federal resources have been used to pay for the item or service?
2. Was the item or services provided with non-federal funds in the previous year?
3. Was the item or services provided to participating children with federal programs funds and to non-participating children with non-federal funds? (Example: Was it provided to general education students from state funds, if so, it cannot be funded by IDEA for special education students.)

Final thought - IS IT A REASONABLE, NECESSARY AND ALLOWABLE.

EQUIPMENT AND REAL PROPERTY

Inventory

The Inventory Control Manager maintains inventory at the school level. Inventory is documented in an electronic spreadsheet that is updated each time equipment is purchased. All federal program property is identified by permanent markings that signify the funding source and the fiscal year the equipment was purchased. The electronic spreadsheet includes a description of the item, serial

number, vendor name, date of purchase, funding source, FAIN, cost, equipment location, use, and current condition. In the event equipment needs to be repaired or replaced, a notation is placed on the inventory stating where the equipment is taken for repair or an equipment disposition form is attached to the inventory. School personnel must annually verify the location and condition of the equipment. Each item must be checked/noted on the inventory record specifically for condition and location. Administrators attest that the equipment is as identified on the inventory record submitted to the FPCO, Executive Director and/or the Federal Programs Director. Appointed personnel help determine the condition of equipment. Hard and electronic copies of the inventories are filed with the Asset Manager. The Director of Operations conducts monitoring of inventory at least three times a year.

Lease of Equipment

DuBois Integrity Academy does not lease equipment using Title funds.

Use of Equipment in Targeted Assistance Schools

DuBois Integrity Academy is not a targeted assistance school.

Equipment Disposition Procedure

Computers purchased with federal funds are inventoried according to the inventory procedures. When the equipment is no longer operational, it will be recycled or disposed of. The school will be given the opportunity each summer to dispose of technology that is out of date or no longer operational. The appropriate Technology Disposal Form should be completed and a copy sent to the Business office. Inventory records will need to be corrected, printed, and maintained by school Asset Manager. At the designated time, the outdated technology is brought to a predetermined location to be recycled. Designees will work with a company to dispose of and recycle all equipment. At that time, the company determines whatever is most appropriate for the equipment. The company is required to present the school with a certificate stating that all data has been removed from all technology devices. Currently, the school does not receive any money for the recycle or disposal of equipment.

In the event, Federal Programs equipment or technology is stolen the following procedure will be followed:

1. File an incident report
2. Attach the incident report to the Technology Disposal form and send it to the Federal Programs Director's office.
3. Make corrections to the Federal Programs inventory
4. Send the updated inventory to the Federal Programs office. The Executive Director must sign and date the inventory spreadsheet.

Off-site Use of Equipment

Prior approval by the Executive Director and/or the Deputy Superintendent is required for the use of federally funded equipment off-site. A written request for use of equipment to be utilized off site may be presented to the executive director and/or deputy superintendent. The executive director/deputy superintendent will approve a request only if it is for the purpose for which the equipment was purchased. The sign-out sheet will be completed to include the date the equipment was taken off-site, use of the equipment, person responsible for the equipment use, date the equipment was

returned and the condition of the equipment on return.

TITLE I

School-Parent Compacts

All Title I schools are required to have school-parent compacts. It is the responsibility of the Parent Involvement Coordinator (PIC) in coordination with the school's stakeholder's (administrators, teachers, school staff, parents, students) to make sure that all compacts are reviewed and revised annually. The review and revision will occur in the winter during various meetings. Revision dates (month, day and year) will be clearly marked on each compact. Invitations for parent input will be sent home to all parents in the school and meeting dates will be given in school newsletters, email, website, and parent app. The Parent Involvement Coordinator will be responsible for setting up meetings and collecting required information (agenda, meeting notes, and sign-in sheets). School-parent compacts will include responsibilities for the teacher, parent, and students. Compacts will be distributed to all parties involved for signatures in the fall of the year prior to November 1st. Copies of the signed parent receipt of the compact are kept on file with the parent liaison. DuBois Integrity Academy believes that the public schools belong to the people who create them and that student educational goals should reflect the goals of the community. We affirm and assure the rights of parents to participate in the development of the goals and objectives of the public schools and encourage involvement in all areas of their children's educational experiences.

The PIC meets in the winter of each year with school leadership team, teachers, parents, and students to provide training on developing effective compacts for achievement. Specific compact compliance handouts are provided to all stakeholders during training. The PIC works collaboratively with the schools to develop specific academic improvement goals and strategies including activities or strategies for parents and students to achieve the defined goals for academic success. The achievement goals for the compact are determined by the comprehensive need's assessment and data analysis.

Parents and additional stakeholders will be trained at input meetings in the winter on the specific student/school needs determined as the goals on the effective and compliant compact. Opportunity to give additional input on the schools' improvement goal(s) and concrete activities/strategies parents can do to build and develop a partnership to help their child(ren) achieve the goals for academic success. Parents will be invited to the school's planning meeting to collaborative develop the compact. Students will also have the opportunity for input as to their responsibility in achieving the improvement goals through a survey.

Annual Title I Meeting

DuBois Integrity Academy holds multiple Title I meetings throughout the year in conjunction with other school events. It is the responsibility of Deputy Superintendent, Principals, Parent Involvement Coordinator, FPCO, and Federal Programs Director to arrange meeting times and invite all stakeholders to the meeting. The PIC will be responsible for collecting and submitting documentation of the required Title I annual meeting, including a copy of the invitation to parents, sign in sheet, agenda, and minutes for documentation. The Annual Title I meetings are held before or after the open houses, PTO meetings, or other events. Meetings are also announced via paper copies to parents, websites, call system, newsletters, and parent app as Title I meetings.

Parent Information and Resource Center

A parent resource center or an area where parents can gain computer access and information is available at the school's administrative office. A variety of materials and resources are available to parents for use at the school's administrative. Parents are also informed of their school's Parent Resource Center through presentations made at parent meetings as well as through flyers/newsletters. The website is also used to distribute information regarding the materials and resources available to parents. Parent involvement resources provided by GaDOE through webinar sessions are shared with the Parent Involvement Coordinator, who is responsible for sharing and planning parent involvement initiatives and information for all schools.

Review and Approval of School Improvement and Schoolwide Plans

DuBois Integrity Academy is a Schoolwide Program. This allows all children and parents an opportunity to have equal access to all related Title I assistance. School Improvement/Schoolwide Plans are updated each spring for the following school year. The school leadership team conducts a series of meetings at which representatives from each grade level, content area, and department, as well as school administration and stakeholders, meet to develop a plan. During these meetings, instructional strategies, parental involvement initiatives, and professional development activities are planned after a careful analysis of various data. School administrators then present their school plan for approval. It is through this process that the LEA oversees the development of the school improvement plan.

Professional Development, Analyzing Data, Technical Support and Assistance

The Leadership Team supports the school in developing, revising, implementing and coordinating school improvement/schoolwide plan during various monthly meetings. During the meetings, data is analyzed to identify and develop solutions to challenges related to instructional strategies, parent involvement, professional learning, and budgets.

Monitoring of Use of Funds

The Executive Director, Accounting Manager, FPCO, and Federal Programs Director meet with the Leadership staff on a regular basis and provide recommendations for budgeting decisions.

School Improvement 1003(a) (g) (SIG)

DuBois Integrity Academy is not designated a Priority or Focus school and therefore does participate in this grant.

ESEA Public School Choice

DuBois Integrity Academy is unable to offer school choice since the LEA consists of a single K-8 State Charter School.

Homeless Children and Youth

Title I schools are required to set aside funds within their budgets to meet the needs of homeless children and youth. The Executive Director, FPCO, Accounting Manager, and Federal Programs Director determines the amount of funds needed to adequately meet the needs of homeless students. The School Social Worker and School Counselor trains school personnel including, counselors, clerks, teachers, and principals to identify children in homeless situations. A home survey is also used to identify homeless students. The FPCO, Deputy Superintendent and Executive Director are consulted if any staff member suspects that a student qualifies for homeless services. An investigation is performed to determine the ultimate determination on whether or not students qualify. When a student qualifies for homeless services notes are maintained related to the situation and an email is sent to the Executive Director. Homeless set aside funds are used to purchase needed supplies for identified homeless students on an as needed basis.

Private School Participation

DuBois Integrity Academy is a State Commissioned Charter School, and therefore the requirement for Services for Eligible Private School Students is not applicable as it relates to Title I, Title II and Title III services.

Transferability of Funds Between Federal Programs

Transferability is the flexibility authority that permits State educational agencies (SEAs) and local educational agencies (LEAs) to transfer a portion of the funding they receive by formula under certain Federal programs to their allocations under other programs so they can address more effectively the needs of all children.

Procedures for the process of receiving funds from Title II or Title IV include the following information.

- Indicate in the CLIP the funds have been transferred to Title I
- Sending program budget is completed and approved
- Title I budget is adjusted for 1% Private School Proportionate Share and Indirect Cost if applicable.
- The Accounting Manager in collaboration with the Federal Programs Director review expenditures to determine which ones would be coded for Title I or the sending programs.
- Drawdown for the sending program is completed in the DE0147 for that program
- Title I drawdown is completed in the DE0147 for Title I
- Completion Report – The actual expenditures for both Title I and Title II or Title IV (the transferred-in amount) will be reported on the Title I completion report by function and object codes. Since the transfer-in amount was combined with the Title I itemized budget, the expenditures for both programs will be reported on Title I.

TITLE II, PART A - IMPROVING TEACHER QUALITY

Purpose

The goal of the Title II-A program is for the school to have a teaching staff that is professionally qualified and effective in helping all students, regardless of individual learning needs, achieve challenging state content and academic achievement standards. A secondary goal is for every student to have an equitable opportunity to receive quality instruction regarding teacher quality, teacher experience, and class size.

Equity Belief Statement

DuBois Integrity Academy believes all students should have equitable access to quality instruction. DuBois Integrity Academy strives to recruit, prepare, train and support high-quality teachers, paraprofessionals, and leaders in our school system. We are also focused on developing school improvement plans with measurable objectives that will ensure that all teachers teaching core academic subjects are and remain professionally qualified.

Annual Needs Assessment Process

DuBois Integrity Academy conducts its annual needs assessment in the winter of each year. The survey is open to all administrators, teachers, and paraprofessionals and addresses the following equity components:

- Professionally qualified status of teachers and paraprofessionals.
- Student access to experienced and effective teachers and leaders.
- Teacher ability to meet the diverse needs of students.
- Student access to comparable class sizes.
- The retention and recruitment of professionally qualified and effective teachers and leaders.

In addition, input on areas in need of improvement is solicited from school leaders by email and during monthly administrative meetings. Feedback is also solicited from parents during the annual Title I meeting, monthly school board meetings open forums. Information gathered from these various sources discussed and decisions made on areas of focus by leaders at Administrative meetings.

Equity Plan

DuBois Integrity Academy Equity Plan for Title II-A is revised each May-June using needs assessment survey and other forms of current data. The Equity Plan serves as the plan detailing professional learning and effective, equitable practices among teachers. School leaders, as well as community and parent stakeholders are involved in the revision process. As the Equity Plan is revised, it is shared with the school leadership team.

Prioritization of Needs

Internal and external stakeholders are involved in the planning process by assisting with the prioritizing of needs. Prioritization of needs is accomplished by analyzing the percentage of responses to various questions on the annual need's assessment. In addition, prioritization is discussed with stakeholders during meetings.

Authorized Use of Funds

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

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

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

Professional Learning

Professional Learning (PL) must be of high quality, scientifically research-based, sustained, intensive, and classroom-focused to have a positive and lasting impact on classroom instruction and teacher performance. It must also address one or more of the annual LEA prioritized needs and be included in the school improvement plan (SIP). Finally, professional learning must focus on increasing the ability of the teaching staff to help all students achieve high academic standards or the school administrative staff to lead their school's efforts to increase student academic achievement.

FEDERAL REQUIREMENTS FOR EVERY STUDENT SUCCEEDS ACT (ESSA)

Professionally Qualified Teachers

The Every Student Succeeds Act (ESSA) requires teachers to be professionally qualified. In Georgia, under OCGA 20-2-2065, the LEA must establish professional qualifications for their teachers.

Professional Qualifications Requirements

DuBois Integrity Academy will ensure that all teachers and paraprofessionals meet the federal, state, and local professional qualification/certification requirements. The DuBois Integrity Academy Professional Qualified policy approved and voted on by our Governance Board is stated below:

DuBois Integrity Academy Federal Requirements for Every Students Succeeds ACT (ESSA) LEA Professional Qualifications Requirements

According to the Georgia State law: OCGA20-2-2065, state certification can be waived for most teachers, meaning that each LEA waives certification and must establish professional qualifications for (PQ) for their teachers.

Teachers who do not hold Georgia State certification through The Georgia Professional Standards Commission must meet the following requirements:

1. The educator must have a minimum of a bachelor's degree from an accredited college or university.
2. Teachers who have formally held a valid state certification that has expired will be allowed 1 year from the date of hire to complete the required teacher certification requirements established by the Georgia Professional (GaPSC) to receive a teaching certificate.
3. A teacher who has held a certification from an outside accrediting agency such as Association of Christian Schools International ACSI will be allowed 1 year from the date of hire to complete the required teacher certification requirements established by the (GaPSC) to receive a teaching certificate.
4. A teacher who has held a professional certificate from another state can complete the State of Georgia reciprocity requirements to obtain a teaching certificate in the state of Georgia.
5. A teacher who has completed a state approved BA program or is currently enrolled in a state approved education program or alternative certification program the LEA may apply for a waiver for the educator. If the educator is granted a waiver, he/she will have to complete the GaPSC requirements by the end of the waiver period in order in order to move to provisional status.

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

Special Education: Teachers required to hold special education certification must hold certification in adapted or general special education curriculum that aligns to the course(s) being taught and the IEP's of the students being served. They may not waive certification in adapted or general education curriculum. Content: All special education teachers issuing grades are required to hold content area certification in the subject field and grade level bands for which the teacher is assigned (K-5), (4-8), (6-12) in accordance with the cognitive level specified in the student's Individualized Education Plan (IEP). Charter and SWSS Waivers: In Georgia, only teachers in LEAs that waive certification may verify content through equivalent degree, coursework and content test; this must follow the LEA certification waiver procedures outlined in the Comprehensive LEA Improvement Plan (CLIP). Emergency/Provisional: In accordance with Individuals with Disabilities Education Act (IDEA), special education teachers in Georgia may not hold emergency or provisional special education credentials. This means that the teacher holding a GaPSC Non-Renewable Professional (N) Waiver (W), or Supplemental Induction (SI) certificate may not meet Georgia's Professional

Professional Qualifications for Paraprofessionals ESSA Sec. 1111 (g) (2) (M); GaPSC Certification Rule 505-2-18 The State of Georgia ensures that it has professional standards for all paraprofessionals working in any school, including qualifications that were in place on the day before the date of enactment of Every Student Succeeds Act. In Georgia, a paraprofessional employed by a Georgia LEA, must meet one of the following requirements: Degree: Hold an associate's degree or higher in any subject from a Georgia Professional Standards Commission (GaPSC) – accepted accredited institution; or Coursework: Have completed (2) years of college coursework (sixty-60 semester hours) at a GaPSC- accepted accredited institution; or Content Area Test: Have passed the GACE Paraprofessional Assessment. If eligibility is established through the assessment, the applicant must hold a minimum of a high school diploma or GED equivalent.

The Action plan for teachers who are in the process of meeting the DIA Board approved Professionally Qualified policy to comply with Every Student Succeeds Act ESSA are as follows:

1. Teachers have been notified that he/she must take and pass the GACE required teacher certification test before their waiver expires.
2. Those teachers who take and pass the state required GACE test and need to enroll and continue to make adequate progress toward completion of a state approved certification program in order to receive an extension on your waiver of be issued and induction certificate.
3. The deputy superintendent, school principal, program site supervisor, mentor and teacher will be responsible for ensuring that each step of the process is implemented and the implementation is documented.

DuBois Integrity Academy will take the following actions to ensure 100% of its teachers meet applicable federal, state, and/or local professional qualification/certification requirements, and a 20 Day Notifications are provided in a timely manner to parents when students have been assigned or taught for four or more consecutive weeks by a teacher who does not meet applicable state

certification or licensure requirements (including professional qualifications developed by the LEA)

The following members of the Federal Programs team will ensure that teachers are making adequate progress toward meeting the above-mentioned LEA professionals' qualifications to become fully certified or licensed in the state of Georgia.

20 Day Notification – Federal Requirement

In Georgia, all LEA schools are required to provide timely notice to parents when students have been assigned or taught for four more consecutive weeks by a teacher who does not meet applicable state or licensure requirements (including professional qualifications developed by the LEA in alignment with an approved charter or strategic waiver application) at the grade level and subject area in which the teacher has been assigned. *ESSA Sec. 1112(e)(1)(A)*

Notification

In compliance with the requirements of the Every Student Succeeds Act, parents must be notified when a student has been assigned or taught for four more consecutive weeks by a teacher who does not meet:

- **Regular Education Teachers in Traditional LEAs** – Applicable ESSA 'in-field' state certification requirements at the grade level and subject area in which the teacher has been assigned.
- **Special Education Teachers in Traditional LEAs** – Special education service certification requirements (General or Adapted) in alignment with the student's IEP and/or content certification at the subject and grade level assigned if the teacher is issuing grades.
- **Regular Education Teachers in Charter/Strategic Waiver LEAs – LEA professional qualification requirements** (in alignment with approved Charter/SWSS application and CLIP/DIP) at the grade level and subject area in which the teacher has been assigned.
- **Special Education Teachers for Service in Charter/Strategic Waiver LEAs** – Special education certification requirements for service (General or Adapted) in alignment with the student's IEP.
- **Special Education Teachers for Content (issuing grades) in Charter/Strategic Waiver LEAs- professional qualifications requirements** of the LEA. The LEA must waive content certification for special education teachers (in alignment with approved Charter/SWSS application and CLIP/DIP) at the grade level and subject area in which the teacher has been assigned.

20 Day Notifications are not required for clearance certificates, paraprofessionals, or substitute teachers.

The following process/procedures will be followed:

DuBois Integrity Academy will send the 20-day notice to the parents of any scholar who has been assigned or taught by a teacher for four or more consecutive weeks that does not meet the state certification or licensure in the area of special education teachers, general education and EIP teachers.

The team will check the certification of all teachers at the start of the school year. Any teacher not meeting the state certification or licensure requirements, the parents of the students being served by this teacher will receive a 20-notice letter within the required time frame mandated by the Federal Programs guidelines.

- Deputy Superintendent, Principal/Federal Programs Team Members
- Assistant Principal of Curriculum & Instruction/Federal Programs Team Members
- MTSS/Federal Programs Team Member
- Human Resource Manager and Associate
- Operations Director

Timeline

The team will review and confirm all certification status at the start of Pre-planning in July of each year and before the start of the school year.

The team will have identified any teacher whose scholars' parents have to receive a 20-day notice

Any teacher who begins working at DIA after the school year begins, the certification status will be verified as part of the onboarding process and a 20 Day notice will be sent out within 10 business days following the four consecutive weeks.

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

The leadership team discusses the recruitment, placement, and retention of professionally qualified, effective teachers and leaders during monthly meetings as necessary. The topic is also discussed, as part of a review of data from the school annual needs assessment during the leadership meetings held annually. The school goals are then created or adjusted for the next school year. In addition to promoting teacher effectiveness, DuBois Integrity Academy focuses on Leadership Effectiveness. An educational Consultant works with school leaders two days a month to support professional development with school leaders and their efforts to improve in steering a data-driven school, promote a positive school climate, and train teachers to individualize instruction.

Recruitment

DuBois Integrity Academy believes getting the right people to fill positions is the most critical Human Resource function undertaken. DuBois Integrity Academy is committed to finding motivated and qualified employees with diverse backgrounds to help achieve its purpose and goals. The recruitment process begins by defining the job, seeking a pool of qualified individuals, selecting the best individual for the position, and finally orienting and inducting the individual to the position and the district.

Teacher Experience and Effectiveness Equity

Teacher effectiveness is measured using two methods.

1. Walkthroughs are conducted at the school by administration to gather data that can be used to guide professional learning activities.
2. Administrators conduct formal observations as part of the Georgia Teacher Keys Effectiveness System (TKES).

Identified inequities in teacher experience will be addressed at the school and classroom level by re-assigning personnel and students as necessary to ensure that all students have equitable access to experienced teachers. The administration will work in conjunction with the school counselor to ensure compliance with this process.

DuBois Integrity Academy works diligently to implement and maintain effective teacher hiring assignment and placement practices. The following is a summary of the district's process and rationale for assignments.

DuBois Integrity Academy believes that it is important for all students to benefit from professionally qualified and experienced teachers. We are aware of the research that states schools with a higher congregation of newer or novice teachers tend to have a weaker teaching force, especially in more at-risk school environments. In addition, we want to ensure our novice teachers have an experienced staff to support them as quality role models demonstrating effective teaching strategies and practices.

Each year, DuBois Integrity Academy conducts a personnel audit. The Administrative Team conducts this audit. The audit is a process of monitoring the experience level, professionally qualified status, poverty level, population trends, and individual school needs. This information is used to determine how many teachers are needed, budget and purchasing decisions, and congregation of too many new/novice teachers. As new teachers are hired during the spring, all of the above information is taken into consideration before assignments and placements are made.

DuBois Integrity Academy ensures teachers, paraprofessionals, and administrators initiate professional learning goals (PLGS) or professional learning plans (PLPs). There are three TKES conferences held per academic year. At the conference at the beginning of the year, teachers submit their professional learning goals. The goals are reviewed at the Mid-Year and End of year conferences.

Retention

Teacher retention is analyzed annually in order to determine if the school may be experiencing low to high teacher turnover. A New Teacher Induction Program is implemented prior to the beginning of the school year. New teachers attend a purposeful new teacher orientation with meaningful sessions conducted by support staff.

- Academic Coaches develop and implement an on-going orientation and induction program for new teachers assigned to be implemented throughout their first year.

Class Size Equity

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

Meeting the Diverse Needs of Students

School administrators conduct focus walkthroughs as part of a school initiative to ensure that all classrooms follow the guidelines of standards-based classroom. One of the items on the walkthrough checklist is the use of differentiation to meet the diverse needs of students. The data from these walkthroughs is compiled at the school level, examined by the leadership team and used to plan professional learning initiatives.

Class Size Reduction

DuBois Integrity Academy does not use Title II funds for a Class Size Reduction (CSR) teacher.

Procedures for Professionally Qualified

DuBois Integrity Academy teachers are required to meet Professionally Qualified status. Professional learning opportunities are paid for with local funds to help all teachers meet professionally qualified status, if necessary.

Procedures for Time and Effort

The Deputy Superintendent and/or Principal will sign off on the Time and Effort forms for all federally funded staff. Forms will be signed at the end of the school year. This information will be maintained in the Federal Programs Director's office.

The LEA or subgrantee must document personnel expenses charged to a federal award to be allowable. Employees paid with federal funds, in whole or part, must maintain documentation of time worked. CFR 200.430(g) details the standards for documentation of personnel expenses that LEAs and subgrantees must follow.

There may be situations where an employee is funded from several cost objectives, but the work could be considered "one cost objective." The key to determining whether an employee is working on a single cost objective is whether the employee's salary and wages can be supported in full by each of the Federal awards on which the employee is working, or from the Federal award alone if the employee's salary is also paid with non-Federal funds.

Below are two common examples followed in Georgia.

Example: Period Certification

- Single Cost Objective (2 CFR 200.1)
- Written procedures determine if this is done once or twice a year
- Supporting documentation is required
- Signed after the fact by an employee or supervisor with knowledge of the work performed
- May be completed on an individual or group document

Example: Personnel Activity Report (PAR), also known as time logs

- Multiple Cost Objectives
- Can be submitted to the supervisor monthly or quarterly as detailed in LEA's written procedures

Procedures for Hiring Instructional Paraprofessionals

Paraprofessional vacancies are posted on the DuBois Integrity Academy Website. A job description is included. Paraprofessional Education Requirements are listed, including:

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

This ensures that the applicants have met the minimum qualifications to be professionally qualified. Professionally qualified applicants are then eligible to interview with the leadership team. All paraprofessionals must meet professional qualified status to be recommended for a position with DuBois Integrity Academy.

Instructional Paraprofessionals

In the event federal funds are used to fund paraprofessionals:

1. Leaders and Academic coaches will annually train federally funded Instructional Paraprofessionals on best practices.
2. A signed schedule documenting that the paraprofessional is under the direct supervision of a certified teacher must be submitted to the Federal Programs Director by the second week of school.

Right to Know Parent Notifications

Parents are notified using multiple methods about their "Right to Know" (right to request information on teacher and paraprofessional qualifications).

The Deputy Superintendent, Principal and Assistant Principals create a master schedule for the

school and identify class needs. The Administrators, Human Resource Personnel and the Federal Programs Director check to see if the teacher holds the appropriate certification. If not, the administrators will check to determine if the teacher meets the district's minimum qualifications. If it is a Special Education Teacher or EIP Teacher, the Deputy Superintendent, Principal and Special Education Director develop a plan to change the schedule to ensure the teacher becomes certified. Teachers are then assigned to the course if professionally qualified or they meet State Certification requirements. If the teacher is not professionally qualified and there is no other professionally qualified teacher available, the administrators work to identify the steps needed for the teacher to become professionally qualified.

According to the Georgia State law: OCGA20-2-2065, state certification can be waived for most teachers, meaning that each LEA waives certification and must establish professional qualifications for (PQ) for their teachers.

Teachers who do not hold Georgia State certification through The Georgia Professional Standards Commission must meet the requirements listed on page 43 (in this handbook) Professional Qualification Requirements.

Professional qualifications for special education teachers cannot be waived. When the administrators assign teachers to special education classes, they must work with the Special Education Director, Human Resource Personnel, and the Federal Programs Director to ensure that the teacher has the required certification(s) to teach the students with disabilities in the class. Certification will also be checked when special education students have a schedule change. Special attention is given to adapted curriculum certification and courses. In the instance that a professionally qualified teacher is not available to teach the class, a certification plan is developed that outlines steps to achieve professionally qualified status, or the schedule is changed.

The Deputy Superintendent, Principals, Human Resource Personnel, and Federal Programs Director monitor in-field reporting and correct data if needed. Both content and service area (EIP, ESOL, Gifted, SPED) will be checked for in-field status for every teacher and teaching assignment. In-field reports will be checked in the GA PSC In-Field Portal each time the portal data is available. The administrators review the reports to address out-of-field teachers. The Federal Programs Director and Human Resource Personnel are responsible for correcting data as needed.

DuBois Integrity Academy issues the Right to Know notice using multiple methods within 30 days from the beginning of the school year. This information can be found on the school's website under Parents Resources and in the Student Handbook. It is also provided during the Annual Title I meeting, through letters to parents, and in the school's offices. The "Right to Know" source documentation is sent to the Operations Manager and Federal Programs Director, who review it to ensure that the notification dates distributed were given.

At the beginning of the school year (within 30 days) and for any students who enroll after that time, parents are notified of their right to request the following information by their child's teacher/paraprofessional, including the following:

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

1. Whether the student's teacher
 - ✓ Has met State qualification and licensing criteria for the grade levels and subject areas in which the teacher provides instruction;

- ✓ Is teaching under emergency or other provisional status through which State qualification or licensing criteria have been waived; and,
- ✓ Is teaching in the field of discipline of the certification of the teacher.

2. Whether the child is provided with services by paraprofessionals and, if so, their qualifications.

The Deputy Superintendent and/or Principal are responsible for:

- ✓ Notify parents in a format that is understandable and will ensure that all parents have the opportunity to receive the information. To the extent practicable, the notification should be provided in a language that parents may understand.
- ✓ Ensure the notification or document contains all the required content and the principal's contact information, the school's name, and the date, month, and year of notification.
- ✓ Send records that document the dissemination of the right to know in multiple forms to the parents of all students to the Federal Programs Director/Human Resource Personnel by the end of August.

TITLE II INVENTORY

The Inventory Control Manager maintains inventory at the school level. Inventory is documented in an electronic spreadsheet that is updated each time equipment is purchased. All federal program property is identified by permanent markings that signify the funding source and the fiscal year the equipment was purchased. The electronic spreadsheet includes a description of the item, serial number, vendor name, date of purchase, funding source, FAIN, cost, equipment location, use, and current condition. In the event equipment needs to be repaired or replaced, a notation is placed on the inventory stating where the equipment is taken for repair or an equipment disposition form is attached to the inventory. School personnel must annually verify the location and condition of the equipment. Each item must be checked/noted on the inventory record specifically for condition and location. Administrators attest that the equipment is as identified on the inventory record submitted to the Executive Director, Operations Director and the Federal Programs Director. Appointed personnel help determine the condition of equipment. Hard and electronic copies of the inventories are filed with the Federal Programs Director. The Operations Director conducts monitoring of inventory at least three times a year. DuBois Integrity Academy does not use Title II funds to purchase computers.

TITLE III – ENGLISH TO SPEAKERS OF OTHER LANGUAGES

DuBois Integrity Academy uses a sound, purposeful educational approach for providing English language development and meaningful program participation for its students.

Pursuant to State of Georgia Law O.C.G.A. § 20-2-156, DuBois Integrity Academy has created a program for limited-English proficient students whose native language is not English. The purpose of this program is to assist such students to develop proficiency in the English language, including listening, speaking, reading, and writing, sufficient to perform effectively at the currently assigned grade level.

DuBois Integrity Academy ESOL Program provides language assistance service primarily through the use of the delivery model:

- Push-in model (within reading, language arts, mathematics, science or social studies) students remain in their core academic class where they receive content instruction from their content area teacher along with targeted language instruction from the ESOL teacher.

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

- Grades K – 3; 45 minutes daily segments or a minimum of 225 minutes weekly
- Grades 4-8; 50 minutes daily segments or a minimum of 250 minutes weekly

Identification, Screening, & Eligibility

Home Language Survey

DuBois Integrity Academy the Home Language Survey as the primary source to determine if a student needs to be screened for language support. All incoming students and their families must complete the Home Language Survey (HLS) upon enrollment.

The Home Language Survey is a series of questions intended to determine the student's primary or home language. If the answer to any of the questions indicates a language other than "English", the student is screened for eligibility for language assistance services. In order to ensure that the responses given on the HLS are accurate and legally binding, the LEA uses translated versions of the HLS when necessary.

Screening for Eligibility

DuBois Integrity Academy uses the World-Class Instructional Design and Assessment (WIDA) screening tool. WIDA Screener Online and the WIDA Screener for Kindergarten are used to assess eligibility for language assistance services.

The WIDA screening instruments are used to measure the English language proficiency of students who have recently arrived in the United States or in our school system. This screening tool is used to determine whether or not a child is eligible for English language instructional services. The WIDA Screener is only administered once; it is not used to assess status or progress of individual students.

The WIDA Screener Online assesses students' abilities in all four language domains (Listening, Speaking, Writing, and Reading), and evaluates Social and Instructional English as well as

academic language corresponding to the subject areas of Language Arts, Mathematics; Science, and Social Studies. The screening results provide scores for each language domain as well as combined composite scores, including a specified Composite Proficiency Level.

ESOL Eligibility Guidance

DuBois Integrity Academy adheres to the Georgia Department of Education's (GaDOE) eligibility guidance which is used to determine eligibility for language assistance services.

WIDA Screener for Kindergarten - The WIDA Screener for Kindergarten is utilized for students entering Kindergarten through the first semester of first grade. Administration procedures are as follows:

- Administer the Listening and Speaking portions of the WIDA Screener for Kindergarten and note the combined Listening and Speaking Raw Score. Note: A Score Calculator for the WIDA Screener for Kindergarten is available on the WIDA website at <https://wida.wisc.edu/assess/screener/kindergarten/calculator>.
- If the combined Overall Composite Proficiency Level (Listening and Speaking) is less than 5, then the student automatically qualifies for language assistance services. However, districts have the flexibility to consider additional factors when determining eligibility for language assistance services for kindergarten students.
- Students given the WIDA Screener for Kindergarten in the 2nd semester Kindergarten through the 1st semester of Grade 1, will be given both the Oral Language and Literacy sections (Listening, Speaking, Reading, and Writing) of the WIDA Screener for Kindergarten. If the student's Overall Composite Proficiency Level (CPL) score is < 5.0, then the student is an English Learner and eligible for ESOL service.
- If a student has been screened and determined ineligible for language support services, the student may not be screened again at a future date for reconsideration of eligibility.

Students in Grades 1-12 will be administered the WIDA Screener for Grades 1-12. The instructions to the WIDA Screener for Grades 1-12 are outlined in the WIDA Screener Online Test Administration Manual located in the WIDA AMS platform and should be followed as indicated in the manual.

When the WIDA Screener for Grades 1-12 (from second semester of grade 1 through grade 12), the criteria for eligibility will follow these guidelines:

- Note: The online test platform automatically scores the Listening and Reading domains during administration. A trained local rater scores the Speaking and Writing domains.
- An Overall Composite Proficiency Level (CPL) score of 5.0 or higher on the WIDA Screener for Grades 1-12 indicates the student does not qualify for language assistance services.
- An Overall Composite Proficiency Level (CPL) score of less than 5.0 on the WIDA Screener for Grades 1-12: student qualifies for language assistance services.

Eligibility flowcharts for Language Assistance Services for students in Kindergarten and grades 1-12 are provided on page 14 of the Georgia Department of Education's ELL Programs Resource Guidance Document.

Steps Following Identification

Under Title III law, once a child has been identified as eligible for language assistance, the parent is notified annually of the following in an understandable and uniform format and to the extent practicable in a language that the parent can understand:

- Eligibility for language assistance services
- Student's level of proficiency and how it was assessed
- Method of delivery of instruction for language assistance
- How program will help the child learn English and meet age-appropriate academic achievement standards for grade promotion and graduation,
- Specific requirements for exiting the program
- Information pertaining to parental rights that includes written guidance detailing the rights that parents have to have the child immediately removed from such program upon their request
- The options that parents have to decline to enroll their child in such a program or to choose another program or method of instruction, if available
- Assisting parents in selecting among various programs or methods of instruction, if more than one program or method is offered.
- Notification of services will be sent to parents on an annual basis.
- All notifications sent to parents will be understandable and uniform format and to the extent practicable, in a language that the parent can understand.

Parent Waiver of Direct Language Assistance Services

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

Although the parents may have chosen to waive a formal language assistance program, the student has been identified and coded as an EL and will continue to be coded as such until the student reaches an English proficiency level that meets the state requirements for exiting language assistance services. ELs whose parents have waived services are still eligible for accommodations on standardized tests and must participate in the ACCESS for ELs test on an annual basis until they meet eligibility criteria to exit the ESOL program.

Developing the English Learner's Schedule

When making decisions regarding student placement, the DIA considers the services and support in place to ensure that ELs are developing social and academic language proficiency and are able to

effectively participate in all academic and special programs within the LEA.

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

DuBois Integrity Academy notifies parents in writing or meets individually with new EL parents to notify them of the availability and type of program of services for ELs in a language which they can understand. Translation services are provided, upon request, for parents who are limited English proficient.

Monitoring Academic Progress ELs

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

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

Student Assessments

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

Georgia Milestones Assessment System

The Georgia Milestones Assessment System (GMAS) is a comprehensive summative assessment program spanning grades 3 through high school. Georgia Milestones measures how well students have learned the knowledge and skills outlined in the state-adopted content standards in language arts, mathematics, science, and social studies. Students in grades 3 through 7 take an end-of-grade assessment in each content area.

In certain situations, individual needs of EL students may warrant accommodations. The ESOL teachers work with the testing team to determine whether or not testing accommodations are needed. Accommodations offered must be consistent with current instructional and assessment accommodations made in the classroom.

Accommodations will be determined by the English Learner Testing Participation Committee

(EL/TPC) and will be made only when appropriate documentation is filed for each eligible student. Only state-approved accommodations may be considered and included in the EL/TPC form. The determination of accommodations for assessment shall be reviewed at least once a year.

ACCESS for ELLs

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

The ELL Lead Teacher is responsible for checking the participation rate and collecting the justification reasons if the percentage falls below 95%.

Exiting From EL Services

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

Kindergarten Students

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

Reclassification

Reclassification is a term that is used when an EL student's English language proficiency level reaches the state and LEA's definition of English proficient, and the student is then exited from EL status and the student's status is reclassified from English Learner=Yes (EL=Y) to English Learner Monitor Year 1 or EL=1. The state mandated English language proficiency assessment, ACCESS for ELLs® or Alternate ACCESS, is used to initiate a student's exit from EL status. If the LEA has chosen an EL exit ACCESS Overall Composite Proficiency Level (CPL) score between the state-flexibility 4.3 and 4.9, then an EL Reclassification Team must be convened for each EL student scoring at or above the LEA chosen criteria, up to CPL 4.9.

Students in Grades 1-7

The student must be administered all components of the *ACCESS for ELLs* assessment. Placement decisions are based on the level (Tier) of the *ACCESS for ELLs* assessment and the student's overall performance:

- If the student is administered the Tier A version of the assessment, regardless of the student's Overall or Composite Proficiency Level (CPL), the student is not eligible to be exited from ESOL services, and will continue to be coded as EL-Y, receive language assistance services and assessed annually with *ACCESS for ELLs*.
- If the student is administered the Tier B or Tier C version of the assessment and scores an *Overall or Composite Proficiency Level (CPL) score of 5.0 or higher and the student's Literacy sub score is 4.8 or higher*, the student will be deemed English proficient and will be exited from language assistance services. The student will be coded EL-M and his/her academic progress will be monitored for 2 years.
- If the student is administered the Tier B or C version of the assessment and
 - Scores an overall or composite proficiency level (CPL) of 5.0 or higher, but with a literacy sub score of less than 4.8
 - or
 - Scores an overall or composite proficiency level (CPL) of 4.0-4.9 and a literacy sub score of 4.8 or higher,

then, at the teachers' discretion, the student may be referred for an English Reclassification. If the referral is made for a conference, the English Reclassification Team will review language proficiency, classroom performance, teacher recommendations, standardized test scores, and writing samples to decide as to whether, when mainstreamed, the student is likely to be successful with only limited English support.

If so, the student will be deemed English proficient, exited from language assistance services, coded EL-M, and his/her academic progress will be monitored and reviewed for two years.

If it is determined that the student's learning is inhibited primarily by a lack of English language skills, the student will not be exited and will continue to receive language assistance services, coded as EL-Y and assessed annually on *ACCESS for ELLs*.

The links to the Exit flowcharts for students in Kindergarten and Grades 1-12 are provided on page 32 of the Georgia Department of Education's [ESOL Guidance Document](#).

Data for Reclassification Team Meeting include:

- Entry and current language proficiency scores.
- Achievement test data in language and content areas.
- Classroom performance, i.e. grades, participation, application (work-study habits, motivation), assignments.
- Criterion-referenced test scores.
- Testing accommodations.
- Types of instructional materials and strategies which are successful with the student
- Academic achievement in the native language, if data are available

- Other supporting documentation as appropriate

Evidence of Reclassification records should include:

- The names and signatures of the participants
- The date(s) of the meetings
- Information reviewed
- Alternative support considered
- Final action

The student's ESOL teacher and the classroom teacher(s) will participate in the LAC. Other participants may be selected from the following:

- The deputy superintendent and/or principal
- Other content area teachers
- Counselor
- Lead teacher
- School psychologist
- Parent(s) of the student

Post-Exit Monitoring

ELs who meet the criteria for proficiency are no longer eligible for language assistance services and must be exited. Title III law requires that districts monitor ELs for 2 calendar years following exit from language assistance services. DuBois Integrity Academy maintains documented evidence that the student was monitored throughout the two-year monitoring phase. Content teachers continue to work with ESOL teachers to make needed adaptations to content material and present it to all second language learners in a less demanding language format. Content teachers will provide students with increasing opportunities to demonstrate what they know by using a variety of formative and summative assessments.

The teacher teams review grades, standardized test scores, talk with student, and talk with parents, if necessary, ensure a smooth transition from the ESOL program. If there is evidence the student is struggling in one or more content areas, the first step is to ensure the student is provided any instructional support available to students within the school and to ensure that the RTI team is aware of their lack of academic progress and success.

Professional Learning

Every teacher of EL students, counselors, and administrators must participate annually in ongoing professional learning relevant to ELs. Topics will include but are not limited to the understanding of the WIDA standards and Can-Do Descriptors. ESOL teachers will also provide ACCESS for ELLs, and/or Alternate ACCESS scores for every student and assist teachers with understanding appropriate expectations based on these scores and the student's level of language acquisition. The results of the annual needs assessment will also be used to determine agenda items for ongoing training.

Parental Involvement & Notification

The LEA assures that parental notification is provided as required for:

- Notification of eligibility of services
- Notification of initial or continuing program placement
- Description of delivery model
- Notification of annual assessment for English language proficiency
- Annual assessment score reports to show growth in language proficiency (Listening, Speaking, Reading, Writing)
- Exit from ESOL Program

TITLE IV, PART A: STUDENT SUPPORT AND ACADEMIC ENRICHMENT (SSAE)

Purpose

Title IV Part A, Student Support and Academic Enrichment (SSAE) grants are intended to improve student's academic achievement by increasing the capacity of States, LEAs, schools and local communities to: (*ESSA* section 4101)

1. Provide all students with access to a well-rounded education.
2. Improve school conditions for student learning.
3. Improve the use of technology in order to improve the academic achievement and digital literacy of all students.

How funds can be used:

School leaders consider funds may be leveraged to support a holistic approach to a well-rounded education. Well-rounded may include: Science, Technology, Engineering and Math (STEM), Music, Arts, Foreign Language, College and Career Counseling, Social Emotional Learning, Accelerated learning Programs, and others. The second purpose of Student Support and Academic Enrichment is to improve school conditions for student learning. When students are healthy and feel safe and supported, they are more likely to succeed in school. Funds may be used for Pay for Success Initiatives aligned with the purposes of Title IV. The third purpose of the SSAE grant is to improve the use of technology and thus improve the academic achievement and digital literacy of all students.

Federal funded expenditures are supplemental to schools' budgets.

TITLE I, PART C - MIGRANT EDUCATION PROGRAM (MEP) SERVICES

Migrant students are identified through the occupation survey, which is a portion of the student enrollment packet. When at any time migrant students are identified, a comprehensive needs assessment and delivery plan will be developed.

The Deputy Superintendent, Principal, Executive Director and Federal Programs Director, will follow these procedures and coordinate with Georgia Migrant Education program Consortium in partnership with Abraham Baldwin Agricultural College (**ABAC**).

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

Race to the Top (RT3) Project Management and Sustainability

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

COMPLAINT PROCEDURES

Grounds for a Formal Complaint

A formal complaint may be filed when an organization or individual believes that DuBois Integrity Academy has violated a requirement of a federal statute or regulation related to the administration of a program. The complaint must allege a violation that occurred not more than one (1) year prior to the date that the complaint is received, unless a longer period is reasonable because the violation is considered systemic or ongoing. The federal ESSA programs for which formal complaints may be filed and investigated are:

What is Included in a Formal Complaint

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

- A statement that DuBois Integrity Academy has violated a requirement of a Federal statute or regulation that applies to an applicable program.
- The date on which the violation occurred.
- The facts on which the statement is based and the specific requirement allegedly violated (include citation to the Federal statute or regulation).
- A list of the names and telephone numbers of individuals who can provide additional information.
- Whether a complaint has been filed with any other government agency, and if so, which agency.
- Copies of all applicable documents supporting the complainant's position.
- The complaint must be addressed to: Director of Operations, DuBois Integrity Academy, 6504 Church Street, Suites 1 & 2, Riverdale, GA. 30274

Once the complaint is received by DuBois Integrity Academy it will be copied and forwarded to the Executive Director and the Federal Programs Director.

Federal ESSA programs for which formal complaints may be filed and investigated are:

- Title I, Part A – Improving Basic Programs Operated by Local Educational Agencies
- Title I, Part A – School Improvement Grants, referred to as 1003(a) and 1003(g)
- Title I, Part C – Education of Migratory Children
- Title I, Part D – Prevention and Intervention Programs for Children and Youth Who Are Neglected, Delinquent, or At-Risk
- Title II, Part A – Supporting Effective Instruction
- Title III, Part A – Language Instruction for English Learners and Immigrant Students
- Title IV, Part A – Student Support and Academic Enrichment
- Title IV, Part B – 21st Century Community Learning Centers
- Emergency Relief Funds CARES Act, CRRSA Act, ARP Act

McKinney-Vento Homeless Assistance Act. A parent, guardian, or unaccompanied youth may also file a complaint under Title IX, Part-A – the McKinney-Vento Homeless Assistance Act, and the process for filing a complaint is the same as it is for the ESSA federal programs.

Equitable Services – Formal complaint procedures regarding a school district's or a 21st CCLC program's equitable services for children attending private school are found on the State Ombudsman webpage.

Complaints Originating at the Local Level

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

Investigation of Compliant

Within ten (10) days of receipt of the complaint, DuBois Integrity Academy will issue a letter of acknowledgement to the complainant that contains the following information:

The date DuBois Integrity Academy received the complaint.

- How the complainant may provide additional information.
- A statement of the ways in which DuBois Integrity Academy may investigate or address the complaint.
- Any other pertinent information.

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

Right of Appeal

If the complaint cannot be resolved at the local level, the complainant has the right to request review of the decision by the Georgia Department of Education. The appeal must be accompanied by a copy of the DuBois Integrity Academy decision and include a complete statement of the reasons supporting the appeal. For complaints filed pursuant to Section 9503 (20 U.S.C. 7883, complaint process for participation of private school children), a complainant may appeal to the Georgia Department of Education no later than thirty (30) days from the date on which the complainant receives the Letter of Findings.

The complaint must be addressed to:
Georgia Department of Education
Office of Legal Services
205 Jesse Hill Jr. Drive SE
2052 Twin Tower East
Atlanta, GA 30334

ETHICS, WASTE, FRAUD AND ABUSE

The Governance Board and Executive Director reviews the ethics, waste, and fraud policies with all administrators during a summer meeting. An agenda and sign in sheets will be kept by the Federal Programs Director to document this has been completed. The deputy superintendent and/or principal discusses the same information with their personnel. Agendas and sign-in sheets are kept by the Federal Programs Director to verify the policies have been reviewed with all staff. A signature, by the person reviewing the policies, verifies the completion of this procedure. Administrators are expected to inform the faculty about policies and updates as they are approved throughout the year. DuBois Integrity Academy's fraud regulation describes the definition, staff responsibilities, and internal controls/investigations.

SPECIAL EDUCATION SERVICES

Purpose

The purpose of the IDEA grant is to provide support and related services to students with disabilities. These services focus on enhancing student achievement through implement relevant activities for students and stakeholders. Additional services include ensuring compliance with all federal and state regulations for special education to include but not limited to collecting and analyzing data on services and outcomes and accurately maintaining budgets for federal special education funds.

IDEA Grant

For a particular cost to be allowed, it must be an excess cost of providing special education and related services. Costs must be, necessary, reasonable, allowable, and documented. Executive Director, Accounting Manager and the Federal Programs Director reviews budget requests to ensure that supplanting is not taking place.

Federal Programs uses the follow questions to ensure that programs are supplementing, not supplanting:

Respond "NO" to the following-questions:

1. Would other monies from the state, or other federal resources have been used to pay for the item or service?
2. Was the item or services provided with non-federal funds in the previous year?
3. Was the item or services provided to participating children with federal programs funds and to non-participating children with non-federal funds? (Example: Was it provided to general education students from state funds? If so, it cannot be funded by IDEA for special education students. The final thought is: Is it a Reasonable and Necessary Expense

Program Compliance

See DuBois Integrity Academy Special Education & Students with Disabilities Policy Manual

Private School

DuBois Integrity Academy Charter School conducts child find, determines the proportionate share of federal funds and provides equitable services to parentally placed private school children with disabilities who attend private/home schools located in DuBois Integrity Academy Charter School who reside in the eligible attendance area. Representatives of private elementary school in DuBois Integrity Academy Charter School System jurisdiction, parent or parent representatives of those SWD in private schools are provided timely and meaningful consultation notice. When conducting the Timely and Meaningful Consultation process, DuBois Integrity Academy Charter School covers the following items during the meeting:

1. The child find process for private schools - how private school students can participate equitably and how parents, teachers, and private school officials will be informed of the child find process and procedures. DuBois Integrity Academy Charter School attempts to locate, identify and evaluate all children suspected of having a disability within their jurisdiction.
2. What the proportionate share amount is and how it is calculated.
3. The consultation process itself and how it will operate throughout the school year so eligible students can participate in special education and related services. Services are comparable in quality, not quantity.
4. How, where and by whom proportionate share funds will be allocated, including a description of the types and amounts of services that will be provided. DuBois Integrity Academy Charter School makes the final decisions with respect to the services to be provided (even if there are insufficient funds to serve all SWD) after receiving views from the participants.
5. How the school, if it disagrees with the views of the private schools on services, will provide a written explanation of why it chose not to follow the views of the private schools. The TMC is completed prior to school starting (prior to June) then the decision on services and fund amount to be provided us made (prior to when school begins).

Conflict of Interest

It is DuBois Integrity Academy Charter School's policy that all employees avoid any conflict between their personal interests and those of the Company. DuBois Integrity Academy's Conflicts of Interest Policy specifically prohibits any board member, officer, agent, or employee from participating in the selection or awarding of a contract to procure goods or services if a real or apparent conflict of interest exists.

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

No board members, school employees, officers, or agents of DuBois Integrity Academy may participate in the selection, award, or administration of a contract supported by a Federal award if he or she has a real or apparent conflict of interest. In addition, no employee, officer, or agent of the district may neither solicit nor accept gratuities, favors, or anything of monetary value from contractors or parties to subcontractors. All employees shall comply with the Code of Ethics shall be subject to disciplinary action, including but not limited to, termination of employment with the district.

ASSESSMENT SECURITY TESTING PLAN

Testing Coordinator

DuBois Integrity Academy conducts the assessment program as required by federal and state law. It follows the Elementary and Secondary Education Act and Georgia law relative to student assessment and data reporting. DuBois Integrity Academy interacts with state and federal agencies relative to the assessment program and accountability mandates. The testing department handles assessment documents and reports including secure test materials, individual student score reports, and school data reports in both paper and electronic formats. DuBois Integrity Academy delivers training/guidance related to the assessment program, assessment data, and accountability mandates to all stakeholders.

Training Plan

Materials

- A. The school must have a sign-in sheet for documentation of teachers and proctor's participation.
- B. GaDOE update on each testing being administered will be provided as a reference/resource for the school testing coordinator.
- C. School Coordinator's manuals and Examiner's manuals are available on the GaDOE's website. These manuals will be used for updated information each year. All manuals must be kept secure and accounted for after each use.
- D. The Testing Coordinator should distribute the roles and responsibilities for all individuals being trained: administrators, examiners, and proctors. Discuss each group's roles and responsibilities, and have individuals sign at bottom. (This document can be found in the Student Assessment Handbook from the GaDOE)

Collection of Materials

- A. Checking in materials from administrative office is the responsibility of the testing coordinator. The packing slip from the school's shipment will be used to check the accuracy of the delivery.

Test Security

- A. In order to maintain the integrity of the assessment program and its results, security must be established and maintained. Test security should be a top priority in both pen/paper and online formats for testing. The responsibility of the assessment program at the school level rests with the deputy superintendent, principal and the testing coordinator.
- B. Use the Student Assessment in Georgia Schools (PSC document) to discuss the testing

ethics and consequences of violations.

- C. Use the Examiner "Must Do" page from the GaDOE's Student Assessment Handbook.
 - 1. Testing Coordinator is responsible for ensuring proper coding of test documents.

Cell Phones

- A. Students are not permitted to use, or bring into the testing environment, any electronic device that could allow them to access, retain, or transmit information (e.g. cell phone, PDA, smartphone, electronic recording, camera, or payback device). An announcement must be made prior to testing that such devices are not allowed in the testing environment. All students cell phones are turned off and collected then placed in a secure environment. Possession or improper use of such devices during testing may result in disciplinary action in accordance with the system's student code of conduct and/or test invalidation.
- B. Examiners and proctors must refrain from having phone conversations, sending emails, sending texts, posting to social media, etc. during their administration of a test to students and during the time they possess secure materials.

Unexpected Events

- A. Unplanned Fire Drill/Bomb Threat - In any unexpected situation, educators must first act to assure the safety of all children and adults, and to protect property from damage. While test security is critical and must be maintained if at all possible, student safety is always the priority. Beyond that and to the greatest extent possible, the integrity of the test being administered is to be maintained.
 - 1. If during a test administration an unplanned fire drill/bomb threat occurs, students must evacuate the building. Lock the door when students have evacuated the room/building if at all possible.
 - 2. Students should not take the test outside and should not be permitted to talk about testing during the drill or incident.
 - 3. If the school's safety plan permits for the testing group(s) to be kept together and under direct supervision, please do so.
 - 4. Note the time of the evacuation so you can figure out how much time students have to complete the testing session.
 - 5. When it is safe to re-enter the building, resume testing as quickly as possible, allowing students the remainder of the allotted time to finish the test.
 - 6. Should the event become lengthy, and once all considerations relative to student safety have passed, the GaDOE will be contacted for further directions regarding plans to resume testing.
 - 7. Materials should be inventoried per normal processes and verified prior to resuming testing.
- B. Severe Weather – If it is feasible and safe to continue testing, that is permissible. Be mindful that online testing can be particularly vulnerable to severe weather due to the possibility of power and internet disruptions.
 - 1. Keep test secure if students must be evacuated.
 - 2. Students should not take the test outside of the classroom and should not be permitted to talk about testing during the event.
 - 3. If the school's safety plan permits for the testing group(s) to be kept together and

under direct supervision, please do so.

4. Not the time of the evacuation so you can figure out how much time students have to complete the testing session.
5. When it is safe to re-enter the building, resume testing as quickly as possible, allowing students the remainder of the allotted time to finish the test.
6. Should the event become lengthy, and once all considerations relative to student safety have passed, the GaDOE will be contacted for further directions regarding plans to resume testing.
7. Materials should be inventoried per normal processes and verified prior to resuming testing.

C. Power Outage (Pencil and Paper Testing)

1. If it is feasible to continue testing, that is permissible.
2. If not, tests should be kept secure within the testing setting. Students should not be permitted to talk about testing during the period during which testing is suspended.
3. Be sure to note the time of the event so that you can figure out how much time students have to complete the testing sessions.
4. When the school can resume testing, do so as quickly as possible, allowing students the remainder of the allotted time to finish the test.
5. Should the event become lengthy, and the school must suspend testing for the remainder of the day, the GaDOE will be contacted for further directions regarding plans to resume testing.
6. Materials should be inventoried per normal processes and verified prior to resuming testing.

D. Power Outage (Online Testing)

1. Please follow all instructions that address loss of connectivity/power in the online testing manuals.
2. It may be necessary to contact the support line for the testing contractor.
3. When the school can resume testing, do so as quickly as possible, allowing students the remainder of the allotted time to finish the test.
4. Should the event become lengthy, and the school must suspend testing for the remainder of the day, the GaDOE will be contacted for further directions regarding plans to resume testing.

E. Students Becoming Sick – Each situation must be considered independently.

1. Remove the sick student from the testing environment as quickly and quietly as possible.
2. If cleaning is necessary to the extent that it will require the relocation of students, the test examiner must collect secure test materials while students transition to a new setting.
3. Students will be allowed to complete testing once relocation has occurred.
4. If relocation is not possible, remove students from the room while it is being cleaned and secure all testing materials - or pause online testing.
5. Students should be kept under supervision, not allowing them to discuss the test.
6. Resume testing as soon as it is feasible, allowing students the remainder of the testing time.

Medical or Restroom Emergency

- A. Given that the health and dignity of students should never be jeopardized, schools must have a plan in place for students who become sick during test administration.
 - 1. If a health/restroom related need develops that is urgent, a student may be escorted to the restroom/clinic and their materials secured.
 - 2. If the event is of short duration, the student may return to testing and received the time lost due to their need to exit the test setting. This should be documented by the school on the Incident Form and reported to the Testing Coordinator but does not have to be reported to the GaDOE as a testing irregularity.
 - 3. If the event becomes protracted and/or the student is unable to return to a test session, report this event as a testing irregularity. This will be reported to the GaDOE portal.
 - 4. In general, for an assessment with two or more "sections", a student who did not return to testing may not re-enter the section they previously had accessed.

Testing Preparations

- A. Testing Coordinator is responsible for checking the accuracy of student information
- B. Testing Coordinator is required to have test examiner's sign materials in and out each day during test administration.
- C. Proctors are used when required. Proctors are only required when there are 30 or more students in a testing environment. All test proctors are trained on their roles/responsibilities.
- D. Testing Procedures are clearly articulated to ensure a smooth and problem-free test administration. Schedules, groups and location assignments, and special directions are distributed and explained before testing administration.
- E. Accommodations are well documented by the Special Education Department. Testing coordinator carefully checks to ensure students are provided the appropriate and accurate accommodations for each individual test.

Collection of Materials

- A. Sign-in and sign-out sheets are used to document who is responsible to each individual test booklet, the date, and number of test booklets received.
- B. Before testing documents are returned, the testing coordinator carefully accounts for all materials.
- C. During the document count, the school coordinator checks for complete information (Form Numbers, Labels, Names) on each answer document.
- D. Materials are returned to the District Office, where the materials are re-counted by the Testing Coordinator.

District Report Card Procedures

The School Superintendent receives notice from the Department of Education that the district/school's report card has been released. The Superintendent has the Web-Administrator to retrieve the report card and post it on the District/Schools website.

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