

Cirrus Academy Charter School

Federal Programs
Procedures Manual
FY 23



CIRRUS ACADEMY
CHARTER SCHOOL

TABLE OF CONTENTS

Purpose of this Handbook	4
Overarching Requirements	
SECTION 1 LEA Monitoring of Programs	5
❖ Monitoring Programs	7
❖ Monitoring Implementation	8
❖ Monitoring Effectiveness	9
Section 2 Comprehensive LEA Improvement Plan (CLIP)	9
Section 3 Services to Eligible Private School Children	19
Fiduciary Responsibility	
Section 4 Maintenance of Effort and Comparability, Assessment Security (All Federal Programs Except Title I, Part C, 1003(a) and 1003(g))	20
❖ Maintenance of Effort (MOE)	20
❖ Comparability of Services	21
❖ Assessment Security	21
Section 5 Internal Controls, Expenditures, Inventory, Drawdowns	23
❖ Internal Controls / Budget Approval / Allowability Procedures	24
❖ Micro Purchases, Small Purchases, Competitive Bids	27
❖ Supplement not Supplant / Resource Allocation Plan	27
❖ Stipends	28
❖ Conflict of Interest	28
❖ Technical Evaluation of Proposals for Services or Equipment	31
❖ Suspension and Debarment	31
❖ Consultants, Contracts, Purchased Services	32
❖ Travel Procedures	32
❖ Cash Management / Drawdowns	33
❖ Reporting Procedures	34
❖ Split Funded Personnel	34
❖ Semi-Annual Periodic Certification	34
❖ Equipment Real Property and Inventory	35
Individual Federal Programs	
Section 6 Title I-Part A - Within District Allocation Procedures	36

❖ General LEA Rank Order Procedures	36
❖ Rank Ordering and Allocation Procedures using CEP Data	37
❖ Rank Ordering and Allocation Procedures in Technical Assistance Schools	38
❖ LEA Reservation of Funds and Carryover	38
Section 7 Title I-Part A Notice to Parents	39
Section 8 Parents Right to Know	40
Section 9 Title I-Part A Family-School Partnership Program	41
Section 10 School Improvement 1003 (a) (84.00)	48
Section 11 School Improvement 1003 (g) SIG (84.377)	49
Section 12 Services for Homeless Children and Youth	49
Section 13 Services for Foster Care Children	52
Section 14 Services for Neglected and Delinquent Children (Neglected Set-Aside)	52
Section 15 Prevention and Intervention Programs for Children Who Are Neglected, Delinquent, or At-Risk (Title 1, Part D, Subpart 2 Grantees)	52
Section 16 Title IV, A Student Support and Academic Enrichment	53
Section 17 Title V, Part B Rural and Low-income Schools Program	55
Section 18 Title III, Part A Language Instruction for LEP (Limited English Proficient and Immigrant Students	56
Section 19 Title I, Part C Education of Migratory Children (MEP) Services	59
Section 20 Individuals with Disabilities Education Act (IDEA) – Fiscal Indicators	60
Section 21 Individuals with Disabilities Education Act (IDEA) – Results-Based	60
Section 22 Individuals with Disabilities Education Act (IDEA) – Consolidation of Funds in Schoolwide Program	60

Purpose of This Handbook

The purpose of this standard operations procedure's handbook is to provide a step-by-step, systematic approach to managing the rules and guidelines of federal programs (listed below) to ensure consistent compliance. The information provided may be used by staff to ensure that Title programs are being implemented accurately and effectively.

The step-by-step approach contained in this handbook will promote uniformity in operations as employees seek to carry out official Title duties and responsibilities. The Georgia Department of Education (GA DOE) provides local educational agencies (Cirrus) extensive guidance on the overarching requirements for federal programs via the on-site monitoring document that is used to ensure that LEAs are meeting all statutory requirements of Title programs. These specific requirements from the GA DOE document were used to create this handbook. It is hoped that this guide will be useful to staff as they strive to comply with all federal program's statutory requirements.

The information included in this document is pertinent to the following Federal Programs. Programs for which Cirrus Academy Charter School receives funds are in *bold italics*:

- *Title I Part A (CFDA 84.010) - State Program Code 1750*
- Title I Part A Academic Achievement Awards (CFDA 84.010) - State Program Code 1752
- *Title II, Part A Supporting Effective Instruction (CFDA 84.367) - State Program Code 1784*
- **Title IV, A Student Support and Academic Enrichment**
- School Improvement 1003(g) (SIG) (CFDA 84.377) - State Program Code 1777
- **The Individual with Disabilities Education Act (IDEA) – (CFDA84.027A)-State Program Code 2824**
- **ESSER I CFDA 84.425D (program code 4155)**
- **ESSER II CFDA 84.425D (Program code: 4180)**
- **ESSER III ARP CFDA 84.425U (Program code: 4190)**

Procedures and processes (i.e., budgeting, requisitions) may be the same; however, the programs are coded and tracked separately.

1. LEA Monitoring of Schools and Programs

The information included in this document pertains to the Cirrus Academy Charter School monitoring process of the implementation of Title I, Part A; Title I School Improvement 1003(a); Title II, Part A; Title IV, Part A; IDEA ESSER I; ESSER II; and ESSER III ARP. The Federal Program Director oversees the requirements of the program.

Cirrus Academy Charter School has developed and adopted a common framework for supporting Cirrus called Georgia's Systems for Continuous Improvement. The "Who" of the framework is the Whole Child,

which is the center of the work. The "What" of the framework comprises five systems focused on Coherent Instruction, Professional Capacity, a Supportive Learning Environment, Effective Leadership, and Family and Community Engagement. The "How" of the framework is the continuous improvement/problem solving process: Identify Needs, Select Interventions, Plan, Implement, and Examine Progress. Cirrus uses the following graphic to illustrate and communicate with teachers, leaders, parents and other stakeholders how the continuous improvement model focuses on the whole child. This model also helps Cirrus staff to focus on those components that improve the conditions for learning.

Sec. 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. The GaDOE has integrated the requirements for planning across all ESSA programs. Cirrus Academy Charter School Consolidated LEA Improvement Plan (CLIP)

eliminates the need for Cirrus to submit separate plans for individual programs. The CLIP, reviewed annually, has two parts:

1. Program Requirements – Cirrus Academy Charter School submits for approval the Consolidated LEA Improvement Plan (CLIP) through the consolidated application process. Federal Programs staff review each CLIP to ensure that the plan contains allowable activities for use and budgeting of federal funds. Once the CLIP has been approved, Cirrus Academy submits a budget reflecting the approved CLIP activities for review and approval by the Federal Programs staff assigned to the LEA. The LEA updates its CLIP under ESSA, as needed, to reflect changes, and it submits the updated CLIP to the SEA for review and approval. Updates to the CLIP are typically performed on an annual basis in Georgia.

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

GEPA Assurance

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

Requirement

Section 427 of the United States Department of Education's General Education Provisions Act (GEPA) requires each applicant for funds (other than an individual person) to include

in its application a description of the steps the applicant proposes to take to ensure equitable access to, and participation in, its federally assisted programs for students, teachers, and other program beneficiaries with special needs. Cirrus applies for federal funding through the Consolidated LEA Improvement Plan (CLIP) application must provide this description in their application. The Georgia Department of Education (GaDOE) is responsible for ensuring that Cirrus has submitted a sufficient section 427 statement.

Submitting to GaDOE

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

Prayer Certification

Sec. 8524 of the Elementary and Secondary Education Act of 1965 (ESEA) as amended by the Every Student Success Act of 2015 (ESSA) requires that, as a condition of receiving ESEA funds, a sub-grantee or sub-recipient must certify in writing to its state educational agency (SEA) that it has no policy that prevents, or otherwise denies, participation in constitutionally protected prayer in public schools as set forth in the law. Each fiscal year, the Superintendent will review and complete this certification on the My GaDOE Portal (<https://portal.doe.k12.ga.us/login.aspx>) by October 1. Cirrus is any district, charter school, agency, or program receiving a federal allocation.

Budgets

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

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

Program-Specific Worksheets

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

Surveys and Attachments

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

Federal Program Statutes

Federal grants are subject to federal laws and any additional requirements specified in state laws.

The following statutes are the most commonly applicable to federal programs in Georgia.

- Elementary and Secondary Education Act of 1965 (ESEA) as amended by Every Student Succeeds Act, 2015 (ESSA)

- Individuals with Disabilities Education Act (IDEA)

- The Official Code of Georgia (OCGA) - Title 20 Education, State Board of Education (SBOE) rules, Georgia Professional Standards Commission (GaPSC) rules

Federal Program Regulations

Regulations further detail the requirements of the laws. Regulations supporting the statutes governing federal programs may be found here.

Federal Program Guidance

Non-regulatory guidance usually serves to outline and describe the goals of the statute or regulations for which it was developed. State education Agencies (SEAs) and local education agencies (LEAs) that adhere to non-regulatory guidance are more likely to achieve the goals of the grant and comply with relevant laws and regulations. The following guidance supports the statutes and regulations governing key federal programs.

- ESSA Early Learning Guidance, 2016

- ESSA Fiscal Changes and Equitable Services Guidance, 2016

- ESSA Title IV, Part A Guidance, 2016

- ESSA Title II, Part A Guidance “Building Systems of Support for Excellent Teaching and Learning”, 2016

- ESSA English Learners and Title III Guidance, 2016 and Addendum January 2019

3. Single Audit under 2 C.F.R. Part 200.50(b) – An audit is a formal or official examination of records and accounts with the intention to verify that proper accounts have been utilized, proper procedures have been followed, and attending documentation has been maintained. If an auditor is unable to verify a program’s accounts, procedures, and documentation, the LEA will be notified in writing, either by first class mail or by electronic mail, of an exception or audit finding(s). The Division of Federal Programs will follow procedures as outlined in the Subrecipient Audit Resolution Guide for resolving any LEA audit findings through a single audit process. 4. On-Site Monitoring – An SEA on-site cross-functional monitoring team visits an LEA to review the criteria included in the LEA monitoring rubric. LEAs are monitored, at a minimum, on a four-year cycle. Approximately one-fourth of the LEAs are monitored onsite each year. As part of the process for determining which LEAs are to be monitored, the Division of Federal Programs conducts a risk assessment using a combination of elements as defined by Department

1.1 Monitoring Federal Programs

Cirrus Academy Charter School conducts monitoring of its programs for both implementation and effectiveness of funded strategies/activities at the LEA, school and program levels to ensure compliance with Uniform Grant Guidance and Federal program requirements. (Title I, Part A; School Improvement 1003(a); School Improvement 1003(g) (SIG); Title II, Part A; Title IV, Part A; IDEA, and CARES/ CRRSA/ARP.

[ESEA: Sec 1114\(b\)\(3\); Sec 1304; Sec. 1306; Sec. 9304; Sec. 2104\(a\)\(1\); 2 CFR Sec. 200.301, 200.329\(a\); 34 CFR Sec. 300; McKinney Vento Sec. 722\(c\)\(3\)\(E\) Non-Regulatory Guidance: Using Evidence to Strengthen Education Investments \(2016\)](#) monitoring procedures in place to ensure compliance with Federal Requirements. Procedures include a method for monitoring all requirements throughout the year by appropriate personnel. Cirrus procedures also include an established monthly cycle of monitoring (timelines and schedules), processes for identifying required corrective actions. The monitoring of all federal programs is addressed through system Leadership Meetings (LT), school level meetings, on-site visits, email and phone correspondence.

Leadership meetings are led monthly by the Superintendent. Within the LT meeting, program directors provide monitoring and technical assistance for federal programs support. The Federal Program Director report on data to review compliance with all federal programs. Cirrus Academy Charter School is one school and one district, and the monthly meeting is held to provide guidance and maintain compliance at the school level. Information gathered at the meetings provides data to determine the impact of implemented programs on an on-going basis and is used as additional support for the needs assessment that is conducted in the spring for the Comprehensive LEA Improvement Plan (CLIP). Data is compiled, reviewed, and analyzed with the intent of improving instruction and to address challenges to student achievement. In addition, this process of regularly scheduled meetings allows the system to identify high risk students within the school and determine appropriate actions to address specific needs. Meetings are documented with agendas, sign-in sheets, data from the academic deans, forms, checklists, templates, data collection instruments, discussion notes. Federal Program Director also report on next steps or corrective actions as warranted. If corrective actions are needed, additional assistance is provided to the school by the Federal Program Director and meetings are held to plan appropriate actions. Chief of Academic and Academic Deans (Academic coaches) continue to collect data to report on the effectiveness of implemented strategies. Additional assistance is provided as needed. On-site visits are also conducted to provide technical support and ensure program compliance. This includes ensuring appropriate use of materials, reviewing expenditures of funds, and conducting a physical inventory of equipment. Federal Program Director is responsible for reviewing documentation, providing feedback, and monitoring the implementation of guidelines. On-site visits are documented with agendas, sign-in sheets, discussion notes, conclusions and next steps or corrective actions. E-mails and phone conversations also take place throughout the year as another means of providing ongoing monitoring, technical assistance, and communication. Cirrus is encouraged to request additional technical assistance as needed.

Previous Cross-Functional Monitoring findings and corrective actions are reviewed and monitored by the Federal Programs Director for compliance.

1.2 Monitoring Implementation

Evidence that the LEA is implementing its FY22 LEA Equity Action Plan for the two equity gaps and each corresponding equity intervention selected for improvement. [ESEA: Sec. 1111\(g\)\(1\)\(B\), 1112\(b\)\(2\), 2101\(d\)\(2\)\(E\), Georgia EAAE](#)

Cirrus uses a data collection instruments to monitor the implementation of all federally funded activities/strategies and budgets. (interview guides, program review checklists, monitoring reports).

Cirrus Academy Charter Federal Programs Director will conduct self-monitoring of school level programs enough to ensure compliance with Title Program requirements. Cirrus Academy Charter School consists of one school, which houses grades K-8. Due to the fact Cirrus Academy Charter School is a small District; the Federal Program Director can maintain direct contact with the Chief Academic Officer and Academic Deans (academic coaches) and works collaboratively with them to complete the consolidated application and both the self-monitoring and on-site monitoring required by all federal programs.

A summary, with supporting documentation, of the LEA's progress in monitoring the implementation of the FY22 LEA Equity Action Plan (required) that addresses each LEA selected equity gap, corresponding equity intervention and identified action steps in the overarching needs or Equity

Action Plan (sign-in sheets, agendas, training documents, surveys, PLC minutes, checkpoint data analysis, contracts/ agreements, purchase orders, reports - discipline, staffing, attendance, etc.) (no matter the funding source).

If implementation has not begun at the time of the visit, provide FY22 Equity Action Plan with notes indicating when implementation will begin. (Notes, justification of why the implementation has not begun, plan for when the implementation will begin).

Copies of the Cirrus schedule for monitoring their school. Cirrus will provide examples of how materials are collected throughout the year to match the timeline; schedule of onsite visits with Chief Academic Officer and Academic Deans (academic coaches). Cirrus will provide communications to the school about the monitoring process (emails, meeting agendas, TA provided, sign-in sheets etc.).

Cirrus will provide on-going consultations with stakeholders and community-based partners that address implementation and progress towards meeting intended outcomes (agendas, sign-in sheets, copy of invitations; copy of documents shared at the meeting/s).

Cirrus provides technical assistance (meetings) because of issues identified through the monitoring

1.3 Monitoring Effectiveness

Cirrus Academy Charter School reviews the equity gaps, equity interventions and the methods for monitoring the implementation for the action steps marked “Yes” in the overarching needs and on the Equity Action Plan for the FY22 Equity gaps and interventions.

Cirrus also reviews the Equity gaps and interventions on required question 4.7 “Reducing Equity Gaps” in the FY22 SLDS CLIP All staff responsible for ensuring the implementation and compliance of federal program guidelines maintain continual communication with schools through meetings, onsite visits, emails, phone calls, and memos to ensure appropriate actions are completed within program guidelines.

process [(monitoring reports (summary report of what changes are needed and the plan for correction), corrective actions from the visit)].

Cirrus Chief Academic Officer and Academic Deans (academic coaches) will provide source documentation (summary data and analysis) to support the monitoring of the effectiveness of the CLIP.

- **Effectiveness of FY22 CLIP**
 - Narrative summary of FY21 Action Steps in CLIP
 - Copy of the Progress monitoring report from FY21 CLIP
- **Effectiveness of Equity Action Plan**
 - SLDS CLIP:
Data that supports the answer to SLDS question 4.7 in required questions on the FY22 CLIP Plan

2. Evaluation of FY21 SWP/TAP included in the FY22 SWP/TAP

Cirrus ensures that it complies with the provision for submitting an annual application to the SEA and revising the LEA’s plans as necessary to reflect substantial changes in the direction of the LEAs program. Title I, Part A; School Improvement 1003(a); Title II, Part A; Title III, Part A; Title IV, Part A; and IDEA ,CARES/ CRRSA/ARP
[ESEA](#): Sec. 1112, 1114, 1115, 1116; Sec. 1003; Sec. 1306; Sec. 1423; Sec. 122; Sec. 3116; Sec. 4106; Sec. 5223; Sec. 5224; Sec. 6223; Sec. 6722; Sec. 9305; 34 CFR § 76.301

3. SERVICES TO ELIGIBLE PRIVATE SCHOOL CHILDREN

Cirrus does not have to provide for the equitable provision of services to eligible private school children, their teachers, principals, and other school leaders because they are a state charter school. Evidence that LEA provided initial consultation to private schools on their participation For LEAs with Participating Private Schools: Evidence that participating private schools engage in ongoing consultation around the equitable provision of services

[ESEA](#): Sec. 1117 and 1120; Sec. 2102(b)(2)(E); Sec.8501(a)(5); Sec. 8501(c); Sec. 4106(e)(2)(B); Sec 8501(a)(5); Sec.8501(c); [34 CFR Part 200.62 -200.67](#); [34 CFR Part 200.77 \(f\)](#)

[USDE Non-Regulatory Guidance Title IX, Part E \(2009\)](#): D-11 Consultation Documentation; D-12 Consultation Meeting Notes D-16 Program Design; D-17 Timely and Meaningful; D-18 Ongoing Consultation; E-2 Private School Status

Cirrus is a state charter school and does not have to meet the above qualifications.

4. MAINTENANCE OF EFFORT (MOE) AND COMPARABILITY, ASSESSMENT SECURITY

Cirrus ensures that it complies with procedures for ensuring maintenance of effort (MOE) as outlined in Sec.1120A and 8521 of the ESEA and IDEA as outlined in 34 CFR 300.203, 34 CFR 300.204, and 34 CFR 300.205.[ESEA](#): Sec. 1120A; Sec. 1114, 1118; [34 CFR 300.203](#), [34 CFR 300.204](#), [34 CFR 300.205](#)

ESSA Documentation for ensuring maintenance of effort (MOE) for ESSA programs:

Under Sec. 8521 of ESSA, A local educational agency may receive funds under a covered program for any fiscal year only if the Georgia Department of Education (GaDOE) finds that either the combined fiscal effort per student or the aggregate expenditures of the agency and the State with respect to the provision of free public education by the agency for the preceding fiscal year was not less than 90 percent of the combined fiscal effort or aggregate expenditures for the second preceding fiscal year, subject to the requirements of subsection (b). (b) REDUCTION IN CASE OF FAILURE TO MEET.— (1) IN

GENERAL.—The state educational agency shall reduce the amount of the allocation of funds under a covered program in any fiscal year in the exact proportion by which a local educational agency fails to meet the requirement of subsection (a) of this section by falling below 90 percent of both the combined fiscal effort per student and aggregate expenditures (using the measure most favorable to the local agency), if such local educational agency has also failed to meet such requirement (as determined using the measure most favorable to the local agency) for 1 or more of the 5 immediately preceding fiscal years. Covered Programs:

- Title I, Part A;
- Title II, Part A;

How does GaDOE test for MOE?

- The GaDOE will test aggregate expenditures of state and local funds to determine if the MOE standard is met. If GaDOE determines that the Cirrus has met MOE based on aggregate expenditures of state and local funds, no further calculations are required.
- If Cirrus does not meet MOE based on aggregate expenditures of state and local funds, Cirrus may test combined state and local funds per FTE using the worksheet in this section.
- MOE for the Individual with Disabilities Education Act (IDEA) is calculated through other means.

The U.S. Department of Education (ED) may waive the ESSA MOE requirements for Cirrus if it has determined that a waiver would be equitable due to exceptional or uncontrollable circumstances, such as natural disasters, a change in the organizational structure of Cirrus, or a precipitous decline in the amount of financial resources of Cirrus (ESEA Sec. 8521(c)). The following worksheet may be used to document precipitous decline and request a waiver from ED.

Budget Monitoring

The information included in this document pertains to the Cirrus Academy Charter School monitoring process of the implementation of all Federal Programs.

In the Spring, an annual district leadership meeting is held. During this work session, previous year's data is used to evaluate and modify school needs, Cirrus Implementation Plan and budget. Superintendent, Assistant Principal and other leaders from Cirrus Academy Charter School, project a budget for items listed within the plans with expenditures and instructional strategies based on evidenced based research and directly related to school improvement. Federal Program Directors, Chief Finance Officer, and Bookkeeper give school personnel support and technical guidance to maintain federal compliance for all programs. The work session covers budgeting, parental involvement, monitoring for effectiveness, ESSA mandates, inventory, and development of appropriate written plans and policies as related to all Federal Programs.

The Federal Program Director work collaboratively with the Finance Department to monitor budgets and run necessary reports. Monitoring of the school's budget status is performed by the Chief Finance Director, with continuous communication occurring between the Superintendent, Finance Director, Accountants, and Federal Program Director. This monitoring is to verify expenditures and verify that requisitions are coded and paid from appropriate LEA program budgets.

Throughout the year, Federal Programs Directors communicates with each Principal and/or School Leadership Team to provide technical assistance with each school's allocation noted within the budget.

In addition, the program directors conduct on-site visits to ensure the purchases that have been made are being utilized in accordance with the budget submitted.

The Federal Program Director (when applicable) will monitor the school’s schoolwide programs. Monitoring will take place through the academic coach, teachers and paraprofessionals schedules, completion of the periodic certifications, required schoolwide plan, Parent Involvement Plan, Equity Plan, notices to parents and School Improvement plan. Schedules are collected two times a year along with the periodic certifications. The Federal Program Director reviews the school plan and completes the GA DOE Title I Checklist for Schoolwide Programs on an annual basis. Schoolwide Plan, and Parent Involvement Plan are placed on the system webpage. Technical assistance is provided to the principal and/or assistant principal for instruction about the results. Federal Program updates and technical assistance are provided to the administrators during Leadership Team meetings.

Reporting and Corrective Action Process

In the years when the system is not monitored by the Cross-Functional Monitoring Team, the Federal Programs Director will complete a program specific Self-Monitoring Checklist and submit them to the correct department of the Georgia Department of Education (GA DOE) as required. Cirrus Academy Charter School will follow the cross functional monitoring schedule as published by GA DOE. The Federal Program Director, as well as other appropriate staff members, participate in state and regional monitoring trainings and technical assistance sessions that are held face-to-face and/or online.

Ensuring Corrective Actions are Implemented

After the on-site cross functional monitoring visit, the Cirrus will receive a comprehensive monitoring report which will contain recommendations, findings, and required actions for all Federal Programs. If a corrective action plan is required, the Federal Program Director and/or Student Support Services Director will respond in a timely manner and submit the appropriate documentation to the appropriate office. Implementation of the corrective action plan will be monitored by the appropriate Program Specialist.

Description of Monitoring Activity	Timeline/ Schedule	Data Review	Participants	Measurement/ Correction and Follow-Up	Technical Support
<ul style="list-style-type: none"> Cirrus Work Session to update and revise Prioritized Needs, LEA Implementation Plan, and budget 	April/June	Data and Budget coinciding with: -CLIP (SW) -Equity Plan Data -Parent Involve. Plan & Policy	-Superintendent -Federal Program Director -Special Education director -Homeless Liaison --Asst. Principal -Teachers - -School nutrition director -School Counselor -Support Staff	(Federal Program Director) -Conduct Mtgs. -Provide Corrective Action and Technical Assistance -Provide Feedback	-Federal Program Director -Student Support Services Director -Homeless Liaison
<ul style="list-style-type: none"> Approved budget in consolidated application is compared with budget Chief Finance 	October – January	-Approved Con App budget	Chief finance Officer/accountant, Programs	-Provide Corrective Action -Technical	Federal Program Director

<p>Officer/Bookkeeper enters in PC Genesis to make sure original budget and any amendment to the budget are entered into the accounting system accurately and in a timely manner.</p>	<p>-Each time an amendment is made to a federal budget</p>	<p>-Approved Budget amendment listed in co</p>	<p>Directors</p>	<p>Assistance -Provide Feedback -Track changes that should occur as a result of meeting (action steps) -follow-up to ensure changes have been made as noted in meeting</p>	<p>-Student Services Director -Finance Director</p>
<ul style="list-style-type: none"> Budgets are reviewed to provide technical assistance, feedback, updates/reviews, and guidance for all Federal Program budgets. 	<p>Quarterly</p>	<p>-Budget -Summary of Activity -Detail of Activity -Payroll Earnings History -Expenses -Budget Allocation amounts -Requisitions -Codes -Expenditure Requirements</p>	<p>Chief finance Officer, Federal Programs Director, Sped Director</p>	<p>-Federal Program Director is lead facilitator when addressing the federal program in which they are responsible (*noted above). -Provide Corrective Action -Technical Assistance -Provide Feedback -Track changes that should occur (action steps) -follow-up to ensure changes have been made as noted in meeting</p>	<p>- Program Directors -Finance Director</p>
<ul style="list-style-type: none"> Administrative Team Meetings – to inform status of expenditure requirements for each federal program -Discuss purchases and needs 	<p>monthly</p>	<p>-Expenditure Requirements for each grant funds are received</p>	<p>Superintendent, Federal Programs Director, SPED Director, Leadership Team</p>	<p>-Federal Program Director is lead facilitator when addressing the federal program in which they are responsible (*noted above). -Conduct Mtgs. -Provide Corrective Action -Technical Assistance -Provide Feedback -Track changes that should occur as a result of meeting (action steps) -follow-up to ensure changes have been made as noted in meeting</p>	<p>- Federal Program Directors -Superintendent -Assistant Principal</p>

2. Consolidated LEA Improvement Plan (CLIP) and schoolwide plans

The information included in this document pertains to Cirrus Academy Charter School monitoring process of the implementation of all Federal Programs.

Schoolwide / School Improvement Plan

Schoolwide Plans - Planning, Revision, and Implementation - Steps

Schoolwide Plans are updated annually. Parents are a required component in planning, revision, and implementation process. Parents are sent information inviting them to participate via mail, email, telephone, flyers, website, and newsletters. Once revisions are made, the plan is placed on the website. Hard copies are also available at the schools.

Maintain: This documentation will include sign-in sheets, agendas, meeting minutes, and emails to and from parents.

2.1 CLIP

Cirrus Academy Charter School organizational structure includes a leadership team, lead teachers, Cirrus Academy Charter School Parent Engagement Committee, all of which may offer input and support to student academic achievement, professional learning activities, CLIP, budget and the school- and system-wide planning process. At each meeting, members sign in and minutes are taken to provide evidence that each organization is aware of activities and issues which concern CACS and is involved in the planning process. Suggestions from these meetings may also be discussed at faculty meetings, parent meeting, and leadership meetings. to receive additional input when needed.

The leadership team is comprised of representatives from special education, administrators, counselor, superintendent, testing coordinator, curriculum director, and federal programs director. Grade spans meetings are held monthly. Grade level teams meet weekly to discuss grade level issues and concerns.

The Federal Program Director are responsible for entering and signing off on the CLIP. The Superintendent will review and sign off on the CLIP.

2.2 RESOLUTION PROCEDURES FOR UNAPPROVED PLANS:

- The Federal Programs Director receives and compiles the information as revisions for the upcoming school year and information uploaded to the CLIP through the Consolidated Application. The Federal Program Director is responsible for updating all plans and submitting to the Superintendent for revisions. In compliance with program requirements, the CLIP revised and submitted to the State Department for approval. When a program manager receives notification of

a needed revision, the appropriate director updates the plan and resubmits the information. The Student Support Services Director completes the same process with respect to the DIP.

- The Federal Program Director resubmits the CLIP for approval
- It is the responsibility of the Federal Programs Director and the Student support Service Director to ensure all policies, procedures, and district plans maintain compliance with guidelines.
- Once the SEA has approved the CLIP & DIP, the completed improvement plans are shared within departments, schools, and community.

TIMELINE AND SCHEDULE FOR DURING SCHOOL TERM:

APRIL/JUNE

- All stakeholders, including Administrative Team are invited to provide input to system planning and budgeting for the revision of the following documents: The Comprehensive LEA Implementation Plan (CLP), LEA Parent Involvement Plan, School Parent Involvement Plans, Schoolwide Plans, School Compacts, DIP and SSIP. Surveys are completed, and schools provide additional input.

JUNE/JULY

- The Federal Program Director completes the final review of the CLIP, LEA Parent Involvement Plan, and School Plans.
- Updates to plans finalized and the CLIP submitted to GA DOE. All plans are placed on the district and/or school website and in each school's office.
- Completion of School Improvement Plans expected.
- The Student Support Services Director completes the final review of the SSIP and submits final plans to the GA DOE. The final SSIP is shared with stakeholders following its approval.

AUGUST

- Revisions made to the CLIP if requested and the plan resubmitted for approval.
- Budgets reviewed and developed.

SEPTEMBER

- Additional revisions made to the CLIP if requested.
- Budgets submitted for approval.
- Programs monitored for compliance and effectiveness.

OCTOBER-DECEMBER

- Budget revisions made and resubmitted for approval if requested
- Programs monitored for compliance and effectiveness

January-March

- Programs monitored for compliance and effectiveness.
- Planning for upcoming school year begins.

3. Services to Eligible Private School Children (does not apply to Cirrus Academy Charter School)

3.1 Private School Consultation

Cirrus Academy Charter School is a state charter school system and do not have to consult with private schools.

Federal Programs services for Title II-A, and Title III are only provided for students attending private schools located within the District's geographic boundaries is not applicable for Cirrus Academy Charter School.

Private schools are not invited to attend because Charter School students can come from anywhere in the state of Georgia. Therefore, Cirrus Academy Charter School is not serving any private schools.

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

4.1A Maintenance of Effort Procedures

GADOE calculates Maintenance of Effort for Cirrus Academy Charter School Under Sec. 8521 of ESSA, Cirrus Academy Charter School receives funds under a covered program for any fiscal year only if the Georgia Department of Education (Department) finds that either the combined fiscal effort per student or the aggregate expenditures of the agency and the State with respect to the provision of free public education by the agency for the preceding fiscal year was not less than 90 percent of the combined fiscal effort or aggregate expenditures for the second preceding fiscal year, subject to the requirements of subsection (b). (b) REDUCTION IN CASE OF FAILURE TO MEET.— (1) IN GENERAL.— The State educational agency shall reduce the amount of the allocation of funds under a covered program in any fiscal year in the exact proportion by which a local educational agency fails to meet the requirement of subsection (a) of this section by falling below 90 percent of both the combined fiscal effort per student and aggregate expenditures (using the measure most favorable to the local agency), if such local educational agency has also failed to meet such requirement (as determined using the measure most favorable to the local agency) for 1 or more of the 5 immediately preceding fiscal years. Covered Programs:

- Title I, Part A;
- Title II, Part A;
- Title V, Part A;
- Title IX, Part A--McKinney-Vento Act.

4.1B Maintenance of Effort (MOE) for IDEA Under 34 CFR 300 of the Individuals with Disabilities Act, a local educational agency must budget and expend, for the education of children with disabilities, at least

the same amount from one of the following sources: state and local aggregate, state and local per pupil, local aggregate, or local per pupil. The Georgia Department of Education monitors two standards: MOE Eligibility and MOE Compliance. MOE Eligibility: To be eligible to receive IDEA funds, Cirrus Academy Charter School must complete the MOE Eligibility form along with IDEA budget submission, in which the LEA budgets to expend, at the least the same amount in one of the four sources: state and local aggregate, state and local per pupil, local aggregate, or local per pupil. The eligibility standard must be met for IDEA 611 and 619 grants to be approved. MOE Compliance: Cirrus Academy must expend, for the education of children with disabilities, at least the same amount from each of the following sources: state and local aggregate, state and local per pupil, local aggregate, or local per pupil. The compliance test will be conducted annually when financial reports have been verified. The MOE compliance results will be in the Consolidated Application under "Special Ed MOE". MOE Exceptions and Adjustments: If Cirrus does not meet eligibility or compliance, Cirrus may request allowable exceptions or adjustments to be processed. There are five allowable exceptions by which Cirrus may reduce its level of expenditures: (a) The voluntary departure, by retirement or otherwise, or departure for just cause, of special education or related services personnel; (b) A decrease in the enrollment of children with disabilities; (c) The termination of the obligation of the agency to provide a program of special education to a particular child with a disability that is an exceptionally costly program because the child has left the jurisdiction, aged out of special education, or no longer needs the program of special education; (d) The termination of costly expenditures for long-term purchases, such as the acquisition of equipment or the construction of school facilities; (this requires prior approval from SEA); and (e) The assumption of cost by the high cost fund operated by the SEA under §300.704(c). There is one adjustment that can be made to an LEAs effort: When Cirrus IDEA Part B 611 allocation increases from the previous year, the LEA may be eligible to reduce the amount required to meet Cirrus MOE eligibility and compliance standards by up to 50% of the amount of the increase, if Maintenance of effort for SPEC is calculated based on guidance and documents provided by GA DOE to facilitate the calculations. Cirrus completes required documents using appropriate data from the District accounting system.

4.2 Comparability To ensure that funds made available under ESSA (Sec. 1118(c)) are used to provide services that are in addition to the regular services normally provided by Cirrus Academy Charter School for participating children, Cirrus must provide services in its Title I schools with state and local funds that are at least comparable to services provided in its non-Title I schools. This requirement is critical to the success of Title I, Part A because it ensures that the federal investment has an impact on the at-risk students the program is designed to serve—something that would not occur if federal dollars replaced state and local resources that would otherwise be made available to these at-risk students. At the school building level, comparability requires Cirrus to ensure that each Title I school receives its fair share of resources from state and local funds. In other words, Cirrus may not discriminate (either intentionally or unintentionally) against its Title I schools when distributing resources funded from state and local sources simply because these schools federal funds.

4.3 Assessment Security

Assessment Security procedures dissemination:

The assessment security procedures are disseminated at test security training meetings prior to test administration. Meeting agendas, sign in sheets and emails are used to document that this occurs.

Assessment Security Procedures

Procedure for Test Material Distribution & Return

Assessment Security Procedures

Cirrus Academy Charter School assures adequate security of the testing materials before, during, and after testing and during scoring as required by the Georgia Department of Education. Testing procedures, rules and regulations used by the Cirrus Academy Charter School follow Georgia State Guidance documents found on the GA DOE website (<http://www.doe.k12.ga.us>). The accountability document used by Cirrus Academy Charter School is titled: **“Georgia Student Assessment Program Student Assessment Handbook”**.

The test examiners pick-up and sign for counted tests and or online test tickets and answer sheets and return them daily to the System Test Coordinator who counts and has test administrators sign again. At the end of the test window, the System Test Coordinator counts and places Test booklets in numerical order and boxes for return to the vendor. Schools are expected to return all test materials after the end of the test window. If test materials are lost or misplaced, immediate contact must be made with the system test director who will contact the DOE. Due to the small size of Cirrus Academy Charter School, the System Test Coordinator is responsible for all areas of the testing process. The System Technology director ensures the online testing set up is completed. System Test Coordinator arranges for the return of all materials to the vendors- materials are returned in accordance to the guidelines and procedures in the Test Coordinators Manual.

Training: The System Test Coordinator and Technology Specialist participates in the webinar trainings provided by DOE each year.

Procedure for Addressing Data Quality & Security Breaches

Security and Accountability Security Breaches

Any action that compromises test security or leads to the invalidation of an individual student’s or a group of students’ test scores will be viewed by the Georgia Department of Education (GA DOE) as inappropriate use or handling of tests and will be treated as such. Below are guidelines to assist system personnel in determining which activities might compromise test security or score validity. Please note that this list is not exhaustive. Any concern regarding test security must be reported to GA DOE immediately. Assessment Administration Division staff members are available to help system personnel develop and implement appropriate test security procedures.

It is a breach of test security if anyone performs any of the following:

- coaches’ examinees during testing, or alters or interferes with examinees’ responses in any way;
- gives examinees access to test questions or prompts prior to testing;
- copies, reproduces, or uses in any manner inconsistent with test security regulations all or any portion of secure test booklets and/or online test tickets;
- makes answers available to examinees;
- reads or reviews test questions before, during (unless specified in the IEP, IAP, or ELL/TPC), or after testing;
- questions students about test content after the test administration;

- fails to follow security regulations for distribution and return of secure test materials as directed, or fails to account for all secure test materials before, during, and after testing (NOTE: lost test booklets constitute a breach of test security and will result in a referral to PSC);
- uses or handles secure test booklets and answer documents for any purpose other than examination;
- fails to follow administration directions for the test.
- participates in, directs, aids, counsels, assists, encourages, or fails to report any of these prohibited acts.
- erases, marks answers, or alters responses on an answer document.

Failure to safeguard test materials or to comply with test administration procedures could adversely affect an employee's certification status. Such must be reported to the GA DOE and may be referred to the Educators Ethics Division of the Professional Standards Commission as failure to adhere to established policies and procedures. Under no circumstances may any tests be reproduced or duplicated for individual or group use unless authorized by GA DOE. Failure to comply with the U.S. Copyright Laws protecting these materials could result in legal action. Any instance of violation of copyright laws must be reported immediately to the GA DOE.

Test Security Procedures:

- System Testing Coordinator receives materials from Vendor- Tests are received at the system and all materials are inventoried and any discrepancies are reported to the testing vendor and the DOE. The materials are stored in a secure location in the testing closet until distributed to the examiner the day of testing.
- System Testing Coordinator prints all test tickets and stores them in a secure location in the testing closet until distributed to the examiner the day of testing.
- Examiner receives materials from School Test Coordinator and return of materials at conclusion of day's testing- The school test coordinator gives the examiners the exact number of test booklets and answer documents or test tickets immediately before the test administration. Examiner counts and verifies the number received. Examiner signs for the number of test/test tickets received and records the time on the log. The Test Coordinator will count them when the Examiner returns the test and will record number of test booklets and the time the test was returned.
- The test examiners pick-up and sign for counted tests and answer sheets or online test tickets and return them daily to the System Test Coordinator who counts and has test administrators sign again. At the end of the test window, the System Test Coordinator counts and places in Test booklets in numerical order and boxes for return to the vendor. The System Test Coordinator counts and places online test tickets in a secure place in the testing closet until all scores are returned. Once all scores are returned and no problems exist, the System Test Coordinator shreds the online test tickets. Schools are expected to return all test materials after the end of the test window. If test materials are lost or misplaced, immediate contact must be made with the system test director who will contact the DOE. Due to Cirrus Academy Charter School
- small size, the System Test Coordinator is responsible for all areas of the testing process. System Test Coordinator arranges for the return of all materials to the vendors- materials are returned in accordance to the guidelines and procedures in the Test Coordinators Manual.

- System Test Director arranges for the return all materials to the vendors- materials are returned in accordance to the guidelines and procedures in the Test Coordinators Handbook.

Training: Training provided by the DOE is held in the fall for all System Test Coordinator and Technology Specialist. Training is held for test examiners before every main test administration. Training includes test preparation, test administration, ethics, security, post test procedures, and reporting of irregularities. Records of agendas, handouts, and sign-in sheets are maintained at the school level.

5. Internal Controls, Expenditures, Inventory, and Drawdowns

5.1 Grant Development and Budget Process

Cirrus Academy Charter School operates their federal grants in accordance with the Code of Federal Regulations. Cirrus Academy Charter School establishes and maintains effective fiscal control and fund accounting procedures (internal controls) over the Federal award that provide reasonable assurance that Cirrus is compliantly managing the Federal award. Internal controls can be defined as a process, implemented Cirrus designed to provide reasonable assurance regarding the achievement of objectives in the following categories: effectiveness and efficiency in operations, reliability of reporting for internal and external use, and compliance with applicable laws and regulations (2 CFR §200.61). The goal of internal controls is to reduce fraud, waste and abuse in the use of Federal funds. Cirrus Academy Charter School will adequately safeguard all assets and assure that they are used solely for authorized purposes. Internal controls are captured in Cirrus Academy Charter School board policies, and some are informal and maintained in Cirrus Federal programs division written procedures. Written processes and procedures governing Cirrus implementation of federal grants should be reviewed routinely and revised as needed. If, in the course of monitoring and audits, a revision of internal controls is required, Cirrus will take prompt action. Written procedures for financial management will include information addressing:

- Cirrus accounting system(s)
- How budgets are loaded onto the system
- Process for comparing budgets to expenditures
- Process for drawing down funds
- Process and authorizations for budget revisions
- Period of performance and when obligations are made
- Process for carryover
- Process for completing the completion reports
- Incorporate state agency requirements, if applicable

Internal Controls / Allowability

Allowability (2 CFR Sec. 200.302(b)(7)) Federal Program Director has responsibility for the respective grant budgets to ensure the efficient and effective administration of the federal award through the application of sound management practices. Grant administrators determine Allowability in accordance with Subpart E— Cost Principles and the terms and conditions of the federal award. Any purchases made with federal funds must follow the guidelines for allowable costs. Cirrus Academy Charter School will follow guidelines as detailed

in EDGAR, OMB Circulars, and applicable memos, letters, handbooks, and/or communication regarding allowable/unallowable purchases provided by the Georgia Department of Education. The Federal Program Director will direct any questionable expense to the GaDOE Area Program Specialist for that program for further clarification. Federal Program Director will review all fund requests for pre-approval. The Federal Program Director will also maintain documentation to support the costs charged to each federal award. The grant administrator will ensure the following:

- That fund requests are necessary and reasonable for the performance of the federal award.
- The cost will be considered reasonable if it
 - Does not exceed an amount that a prudent person under the circumstances would incur at the same time
 - Is considered ordinary and necessary for the operation and effectiveness of the federal award
 - Is comparable to market prices for the geographic area
 - Follows sound business practices
 - Is between two parties that are independent
 - That the funds conform to any limitations of exclusions set forth in the 2 CFR Sec. 200 as to types or amounts of costs.
 - That the funds are consistent with policies and procedures (GAAP).
 - That funds are allocable to the federal program (law and non-regulatory guidance)
 - The cost will be considered allocable if
 - Goods or services involved are chargeable to the federal award.
 - It is necessary for the overall operation of the federal award.
 - The Federal Program Director will charge proportional costs to the appropriate grant award if applicable.
 - That the funds adhere to the period of performance.
 - Federal Program Director will ensure that new obligations incurred to carry out the work authorized by the federal grant are during the time frame which the grant may incur new charges.
 - The period of performance will be July-June (12 months) with an interim time frame of July – September (additional 3 months).
 - That the funds avoid conflict of interest (see conflict of interest policy section 5.1 e)
 - That the funds are adequately documented through the collection of artifacts (agendas, sign-in sheets, handouts, forms) That the funds are subject to allowability described in the General Provisions for Selected Items of Cost (2 CFR Part 200.420-200.475).
 - FY20 and FY21: Fiscal requirements for federal programs apply to all federal awards provided to GaDOE from ED. This includes the grants responding to the 2020 COVID-19 pandemic: Elementary and Secondary School Emergency Relief Funds (ESSER) from the Coronavirus Aid, Relief, and Economic Security (CARES) Act, Coronavirus Response and Relief Supplemental Appropriation Act (CRRSA), American Rescue Plan Act (ARPA) and any amendments or continuations of these grants and this statute. LEAs must review their written internal controls and procedures and add clear references that these grant funds follow the same procedures as the other federal grants.

RISK ASSESSMENT

Control Activities / Allowability

Cirrus Academy Charter School has a CFO and local bookkeeper which provides for separate accounting of Non-Federal funds (local and state) and Federal funds. Federal Programs Directors are

familiar with their program's Guidelines and have been trained to identify the unallowable activities from the allowable ones. Also, the PD reviews the expenditures to make sure that the expenditures follow the program Curriculum Objectives and EDGAR. GA DOE directives are followed to ensure that accounts are properly maintained in line with any changes in the cost accounting system.

Federal Program Directors are familiar with guidelines concerning allowable costs and are kept aware of any changes through Federal or GDOE updates and workshops. In some cases, it may be necessary to use funds from multiple grant sources. When this is necessary, it is indicated on the requisition to ensure duplication of payment does not occur.

The following steps are followed in the expenditure of **all Federal** funds after the budget, which is part of the Consolidated Application, is approved.

- Purchase order forms are available at each school and at the central office. Purchase orders may be generated individually or by the Federal Programs Director, or Curriculum Director. (**EXCEPTIONS:** All technology purchases, including software, hardware and supplies, utilizing **Federal Programs** funds must originate with the Federal Program Director. This also allows for correct uploading, inventory and assignment.
- Purchase Orders require the signature of the Federal Program Director, Chief Financial Officer, and Superintendent.
- For each purchase a purchase order is submitted then approved or rejected by the Federal Programs Director who must review the purchase order for the allowable/unallowable expenditures as dictated by EDGAR, the annual needs assessment, CLIP and budget. The federal program director then assigns the function and object code for the purchase by referring to the budget sheets for each federal program on the consolidated application budget pages.
- The approved Purchase Order is forwarded to the accountant to enter and send to the vendor to make the purchase. If the purchases order exceeds \$5,000 it is submitted to the Superintendent for approval prior to going to the accountant.
- When the purchases are received, the receiver checks items received against the purchase order. Then the packing slip is kept for verification.
- The Accountant forwards the invoice to the Federal Program Director for payment approval.
- The Invoice is then forwarded to Chief Financial Officer for payment.
- Upon receipt of the invoice, the Chief Financial Officer matches the invoice and purchase order and then issues a check.
- All items with a shelf life of 1 year or greater are labeled appropriately and inventoried by the appropriate persons. Inventories are maintained by the media specialists. Appropriate label and/or asset tag are attached.
- The Chief Financial Officer re-checks all documentation before charging the purchase to a federal program and entering it into the accounting system software.
- Copies of the purchase order and invoice are maintained at the BOE office.

Information & Communication

The Federal Programs Director receives reports at least quarterly (PC Genesis) from the Accountant that shows a summary of budget expenditures during the past month and on a cumulative basis. These reports are reviewed by Federal Programs Director to ensure the expenditures are aligned with the budget on the consolidated application. These reports keep the schools and Federal Programs Director updated and informed about budget spending.

The Federal Programs Director follows up on any problems or weaknesses reported in Internal Controls and resolves questioned costs in a timely manner. Employees are encouraged to report any suspected improprieties to the appropriate person, and appropriate penalties are enforced for any misappropriation or misuse of funds. Federal and GA DOE guidelines (including EDGAR) regarding activities allowed/ unallowable and preparation of reports are available in the Federal Programs Director's office and available for training and reference purposes for personnel. All Cirrus Academy Charter School Board of Education personnel who are Involved in spending of federal allocations for **Federal Programs** are aware of the penalties Involved with the misuse of Federal funds and assets.

The Annual Title I Conference held by GA DOE in Atlanta deals with program and budget matters. Regional meetings with Program Directors, Program Specialists and GA DOE Consultants are held to discuss administrative issues, budgeting and program requirements. The Federal Programs Director is also in regular contact with the GA DOE Program Specialists for any needed technical assistance. Any program changes may also be electronically communicated directly to the Federal Programs Director from GA DOE and Area Program Specialists. The Federal Programs Director advises other appropriate school and district personnel of any program or administrative changes that may affect their responsibilities. The Federal Programs Director keeps a copy of the handbooks/guidance, EDGAR and federal laws concerning these laws in office files.

Control Environment /Allowability

The Cirrus Academy Charter School Board of Education has established a reasonable Federal and Non-Federal budget to properly administer this program and discourage miscoding of expenditures. Cirrus board of Education policies and procedures help to ensure accurate reports and fair presentation of **program** costs. Board management will enforce appropriate penalties for misappropriation and/or misuse of funds. The Federal Programs Director and the Chief Financial Officer are aware of the need to provide separation of allowable Federal versus non-Federal costs. Board management has employed knowledgeable and experienced personnel to administer this Federal Programs and the appropriate management support to do so.

All program expenditures will be monitored by the Cirrus Academy Charter School Program Directors to verify that each program's expenditures comply with program requirements and that correct requisition procedures have been followed. Financial reports are requested regularly (at least every Quarter) to review expenditures and verify that the appropriate personnel are coded and paid from **appropriate** budgets. All documentation relating to each specific program including those needed for future auditing/monitoring according to the Cirrus Cross-Functional Monitoring will be maintained by

the Federal Program Director and/or the Cirrus Academy Charter School Board of Education Finance Office. School principals review and sign all purchase orders to make sure they follow the schoolwide improvement plan. The program director for each program reviews, checks for allowable costs, approves and signs off on all the purchase order received from the schools. The Purchasing Officer assigns a PO number and orders the materials. Materials received are checked against the packing slip. The Program Director gives final approval. The Chief Financial Officer then verifies the expenditure to the correct program, function and objective code and pays the invoice.

5.2 Procurement and Rational of Contractual Service

All purchasing for the Cirrus Academy Federal Programs will follow the rules and guidelines of the Cirrus Academy Charter School Board of Education and meet Georgia Auditing Guidelines and meet federal regulations.

Method of Procurement (Uniformed Grant Guidance 200.320):

- **Micro-purchase:**

Acquisition of supplies and services under \$3,500 or less for one item or multiple items on a requisition. May be awarded without soliciting competitive quotations if nonfederal entity considers the cost reasonable. To the extent practicable the District will distribute micro-purchases equitably among qualified suppliers.

- **Small purchase procedures:**

Good or service that costs more than \$3,500 and up to \$150,000 or less. The District must obtain price or rate quotes from an adequate number of qualified sources (at least 2). This process is relatively simple and informal.

- **Competitive sealed bids, or competitive proposals are required for purchases over \$150,000**

For sealed bidding to be feasible, the following conditions should be present: (1) A complete, adequate, and realistic specification or purchase description is available.

(2) Two or more responsible bidders are willing and able to compete effectively for the business; and

(3) The procurement lends itself to a firm fixed price contract and the selection of the successful bidder can be made principally based on price.

ii. If sealed bids are used, the following requirements apply: (1) Bids must be solicited from an adequate number of known qualified sources, providing them sufficient response time prior to the date set for opening the bids, for local, and tribal governments, the invitation for bids must be publicly advertised.

(2) The invitation for bids, which will include any specifications and pertinent attachments, must define the items or services for the bidder to properly respond.

(3) All bids will be opened at the time and place prescribed in the invitation for bids, and for local and tribal governments, the bids must be opened publicly.

(4) A firm fixed price contract award will be made in writing to the lowest responsive and responsible bidder. Where specified in bidding documents, factors such as discounts, transportation cost, and life cycle costs must be considered in determining which bid is lowest. Payment discounts will only be used

to determine the low bid when prior experience indicates that such discounts are usually taken advantage of; and

(5) Any or all bids may be rejected if there is a sound documented reason.

(formal advertising) for purchases greater than \$250,000.00. Bids are publicly solicited, and a firm fixed price contract (lump sum or unit price) is awarded to the responsible bidder whose bid, conforming with all the material terms and conditions of the invitation for bids, is the lowest in price (§200.329(b)).

5.3 Supplement not Supplant / Resource Allocation Plan

Cirrus Academy Charter School may use federal funds only 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. In no case may federal funds be used to supplant (i.e. take the place of) state or local funds. It is a violation of the supplement, not supplant requirement if Cirrus distributes regular state and local funds in a way that discriminates against students in a Title I school.

All of Cirrus Academy Charter School is a Title I Schoolwide school and supplement does not supplant regulations are tested based on the Charter School's Resource Allocation Plan. The Charter School has a Resource Allocation Plan in place that was approved by the GA DOE.

Under ESSA, Title II, Part A Section 2301 maintains a supplement does not supplant requirement. For Title II, Part A presumptions of supplanting include 1) to determine if the expenditure is required to be made available under other federal, state or local laws and 2) whether the expenditure was provided with non-federal funds in the prior year.

Title II, Part A funds may be used only to supplement educational program activities provided with state and local funds. Cirrus may not use Title II, Part A funds to pay for activities that, in the absence of these funds, would be provided with state and local funds. Title II, Part A funds may be used to fund only the professional development activities that supplement those mandated locally or by the state and can supplement those discretionary professional development activities that Cirrus would fund in the absence of other local and/or state funding sources.

5.4 Stipends

The **Cirrus Academy Charter School** abides by Georgia Department of Education Rule 160-3-3-.04 as it relates to Professional Learning. Stipends are defined as "funds awarded by an LEA 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/work hours". Compensation should be awarded only for allowable activities within the scope of the Federal award. Payment must be reasonable and necessary to the program. The payment for stipends is consistent across federal and non-federal programs. Stipends may be awarded only if the following conditions exist: 1. 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; 2. 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 3. Participation occurs beyond

regular contract hours, days, or school year. Before payment can be made for services provided, a “Stipend Authorization Form” should be completed and signed, which includes the description of services provided and the rate of pay OR specified product(s) and rate of pay, signature of person approving/overseeing work, and signature of Federal Programs Director. A timesheet should be attached to the “Stipend Authorization Form,” accompanied by a Periodic Certification form signed and dated by the supervisor, before forwarding to the Federal Programs Director. Once the “Stipend Authorization Form” is approved, the documents should be forwarded to the Payroll Coordinator to process payment. 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.

5.5 Conflict of Interest

Cirrus Academy Charter Schools’ policy concerning professional ethics is presented to all employees during the school year through email and is placed on the school website. This policy contains the Professional Code of Ethics including those related to public funds and property and conflict of interest.

Conflict of Interest Procedures

Professional Code of Ethics Standard 5: Public Funds and Property - An educator entrusted with public funds and property shall honor that trust with a high level of honesty, accuracy, and responsibility.

No employee, officer, or agent may participate in the selection, award, or administration of a contract supported by a federal award if he or she has a real or apparent conflict of interest. This includes any employment of a party or awarding of a contract that would result in a tangible personal benefit to a system employee. In addition, Cirrus Academy Charter School employees must neither solicit nor accept gratuities, favors, or anything of monetary value from an order. Failure to abide by these policies may result in disciplinary action which may include a written reprimand, short term suspension, or termination of employment.

§ 200.112 Conflict of interest

Cirrus Academy Charter School requires disclose of any potential conflict of interest related to federal programs in writing.

§ 200.318(c)(1) General procurement standards

Cirrus requires its employees engaged in the selection, award and administration of contracts to comply with the following: No employee, officer, or agent may participate in the selection, award, or administration of a contract supported by a Federal award if he or she has a real or apparent conflict of interest. Such a conflict of interest would arise when the employee, officer, or agent, any member of his or her immediate family, his or her partner, or an organization which employs or is about to employ any of the parties indicated herein, has a financial or other interest in or a tangible personal benefit from a firm considered for a contract.

It is the intent of the district for all employees to conduct all activities associated with procurements in compliance with the highest ethical standards, including the avoidance of any real or perceived conflict of interest. It is also the intent of the district to impose appropriate sanctions or disciplinary actions, including but not limited to termination and/or prosecution, for any employees who violate any of these requirements.

No employee, officer, or agent may participate in the selection, award, or administration of a contract supported by a federal award if he or she has a real or apparent conflict of interest. This includes any employment of a party or awarding of a contract that would result in a tangible personal benefit to a system employee.

The employees and consultants of Cirrus Charter School have the responsibility of administering the affairs of the Cirrus honestly and prudently, and of exercising their best care, skill, and judgment for the sole benefit of the Cirrus. Those persons shall exercise the utmost good faith in all transactions involved in their duties, and they shall not use their positions with the Cirrus or knowledge gained there from for their personal benefit. The interests of the organization must be the first comprehensive in all decisions and actions.

Conflicts of interest may arise in the relations of directors, officers, and management employees with any of the following third parties: Persons and firms supplying goods and services; Persons and firms from whom the District leases property and equipment; Competing or affinity organizations; Donors and others supporters; Agencies, organizations and associations which affect the operations of the District; Family members, friends, and other employees.

A conflicting interest may be defined as an interest, direct or indirect, with any persons or firms mentioned above. Such an interest might arise through: Owning stock or holding debt or other proprietary interests in any third party dealing with the Cirrus. Holding office, serving on the board, participating in management, or being otherwise employed (or formerly employed) with any third party dealing with Cirrus. Receiving remuneration for services with respect to individual transactions involving the Cirrus. Using time, personnel, equipment, supplies, or goodwill for other than Cirrus/Federal Program-approved activities, programs, and purposes. Receiving personal gifts or loans from third parties dealing or competing with the Cirrus. Receipt of any gift is disapproved except gifts of a value less than \$25, which could not be refused without discourtesy. No personal gift of money should ever be accepted.

The areas of conflicting interest listed above, and the relations in those areas which may give rise to conflict, as listed above, are not exhaustive. Conflicts might arise in other areas or through other relations. It is assumed that the directors, officers, and management employees will recognize such areas and relation by analogy. The fact that one of the interests described above does not necessarily mean that a conflict exists, or that the conflict, if it exists, is material enough to be of practical importance, or if material, that upon full disclosure of all relevant facts and circumstances it is necessarily adverse to the interests of the District.

However, any of the interests described above shall be disclosed before any transaction is

consummated. It shall be the continuing responsibility of the board, officers, and management employees to scrutinize their transactions and outside business interests and relationships for potential conflicts and to immediately make such disclosures. Transactions with parties with whom a conflicting interest exists may be undertaken only if all of the following are observed: The conflicting interest is fully disclosed; the person with the conflict of interest is excluded from the discussion and approval of such transaction; competitive bid or comparable valuation exists; and the District has determined that the transaction is in the best interest of the organization. Disclosure in the organization should be made to the Superintendent or Federal Programs Director.

The Superintendent and/or School Board shall determine whether a conflict exists and in the case of an existing conflict, whether the contemplated transaction may be authorized as just, fair, and reasonable to District. The decision of the Superintendent and/or School Board on these matters will rest in their sole discretion, and their concern must be the welfare of the District and the advancement of its purpose.

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

5.6 Technical Evaluation of Proposals for Federally Funded Services or Equipment

Software packages, program models, and other instructional support packages will be evaluated by a committee led by the Superintendent, Assistant Superintendent, or Federal Programs Director prior to purchase to ascertain that the purchase meets identified needs in the District's/School's needs assessment. All purchases must be preapproved and aligned with the District's CLIP and/or the School's SWP and SIP. (Items not budgeted will not be approved)

All technology items must meet requirements of the Technology Department.

Processing newly purchased items:

- Inventory all items – will be entered by the Technology Specialist
- Items will be labeled by media specialists
- Items will be prepared for use (imaged, tested for issues, etc.) by the Technology Specialist
- Computer technician's setup the equipment in the designated buildings and rooms as indicated on the inventory

For large procurements, the principal, together with Programs Director, jointly establishes an acquisition strategy setting forth the various steps in the procurement process, the key issues to be resolved at each of these steps, and the agreed timetable. The strategy should elaborate in detail the needs to be fulfilled and other issues of critical importance to the process, e.g. economic/financial factors, cooperation with external parties Involved, if any (for example, transportation if the service is

provided after school) and coordination with other related events. The strategy may also include special procurement techniques, such as the use of other state/local/federal programs budgeted monies.

SPECIFICATIONS OF REQUIREMENTS

In the case of purchase of goods, details of the requirement should be described using generic, comprehensive and unambiguous technical specifications. Specifications must be clear and sufficiently detailed to enable vendors to meet the identified need and to compete fairly. Except in the case of an approved standardization, specifications should not refer to brand names, catalogue numbers or types of equipment from a manufacturer except when it is necessary to guarantee the inclusion of an essential design, or characteristic of functioning, construction or fabrication. In these cases, the references should be followed by the words “or equivalent” together with the criteria for determining such equivalence. The specifications should permit the acceptance of offers for equipment with similar characteristics that provide performance and service at least equal to that specified.

5.7 Suspension and Debarment Process

Grant requirements state non-Federal entities are prohibited from contracting with or making sub-awards under covered transactions to parties that are suspended or debarred or whose principals are suspended or debarred. Covered transactions include those procurement contracts for goods and services awarded under a non-procurement transaction that are expected to equal or exceed \$25,000. Cirrus Academy Charter School will utilize SAM to search vendors to check for suspended or debarred parties. CACS will also maintain documentation of the search in the Programs’ offices. The Programs’ office staff will look at total cost for vendors on a monthly basis. If the totals over the course of the year exceed \$25,000, SAM will be utilized to search all vendors and documentation will be maintained.

Finance office will verify the vendor is not “Debarred” by checking for any exclusion at <https://www.sam.gov/portal/public/SAM/>.

Check for the vendor by entering their Dun and Bradstreet Number (DUNS) in the proper field accessed by the **Search** button. Print report to PDF and save for verification.

5.8 Consultants, Contracts, Purchased Services for Federal Programs Funds

Contracts are required for all consultants and purchased services. Agreements are entered between Cirrus Academy Charter School and the consultant. Each contract meets the following requirements:

- Contracts are generated by Federal Programs 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 or days to be worked, and the rate of pay.
- Copies of signed contracts must be maintained on file.

- Administrators must submit the tutoring time logs based on the payroll deadlines.
- Each contract is signed by the following:
 - Contractor
 - Superintendent
 - Federal Programs Director

Verification of Work

The Federal Programs Director or designee 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 Federal Programs office.

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

5.9 Travel Procedures

Cirrus Academy Charter School use the following procedures for addressing travel expenses to ensure that federal funds are expended according to program requirements and cost principles outlined.

- Pre-approval must be received for personnel to attend workshops/trainings/conferences that will incur travel expenses related to official business. Pre-approval is received by a request submitted to the Federal Program Director professional learning procedures and is approved by the federal program director.
- Documentation must be kept and submitted in order to be reimbursed for incurred expenses.

Documentation includes: (a) Notice that the event has been approved (b) Completed employee travel expense form (c) Documentation supporting attendance (i.e. agenda, handouts, class description)

- Reimbursement requests are approved by the principal and the appropriate program director before being sent to the finance department for payment.
- All travel reimbursements will be made in compliance with state travel regulations. Receipts are required for lodging and parking if applicable.

Travel policies and procedures are outlined on the forms. The forms are located on the school server under staff/schooldays/forms.

5.10 Cash Management / Drawdowns

(Followed for Title I, Part A, Title I-C, Title II-A, Title III-A and Title VI-B and IDEA)

Risk Assessment

The Chief Financial Officer prepares the requisition for a drawdown two days after the Governing board meeting to the GA DOE every month. The Federal Program Director, the CFO, the accountant and the Superintendent approves drawdowns prior to submission. The cash requested is based on the prior month's expenditures. The Federal Program director submits the DE0147 to the GA DOE. The CFO, having received both formal and informal training, is familiar with the federal guidelines of Cash Management. Federal programs are on a reimbursement basis, and the CFO is aware of the GA DOE guidelines and the Treasury Regulations, which implements the Cash Management Improvement Act of 1990 (CMIA). The CMIA requires grant recipients to enter into an agreement which prescribes specific methods for drawing down Federal funds for grant programs.

Control Activities

The CFO is familiar with "Financial Management for Georgia Local Units of Administration" which provides guidelines for requesting funds from GA DOE. Guidelines state that program costs need to be paid for by the entity funds before the reimbursement from the GA DOE is received. The CFO prepares a worksheet that reflects expenditures incurred since the last request and compares them to any cash that may be on hand for the Federal program. Next, the CFO determines Federal program expenditures shown in ledger reports. Ledger reports can be generated at any time to reflect the cash needs of the Federal program. The CFO also consults with Programs Directors, Payroll Clerk about any specific or unusual expenditures that are to be expected in the next month before the District will receive the drawdown. The Requisition is then changed by that amount to reflect the expected expenditure. Requests are submitted electronically to GDOE using the Grants Accounting Online Reporting System (GAORS). After approving requests, GA DOE directly deposits the funds into the Board's operating bank account. The CFO then records the deposit in the respective Federal fund. The amount deposited into the operating account is compared to the amount requested and any variances are investigated.

5.11 Reporting Procedures / Completion Reports

Copy of the completion report for the previous fiscal year will be kept on file in the Federal Programs offices and in the Finance Department. Accounting records to support the results of outlays (expenditures indicated in the completion report) will be kept on file in the Federal Programs offices and Finance Department.

Copies of expenditure (cumulative through) reports for the respective quarter for total expenditures reported to GA DOE will be kept on file in the Federal Programs offices and Finance Department.

Federal Programs will run budget summary and budget detail expenditure reports for all federal funds.

5.12 Split-Funded Personnel

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

Forms are signed monthly by the immediate supervisor of the staff member. The split time log is filled out after the end of each month and submitted to the immediate supervisor for review and signature. Signed forms are maintained in the Federal Programs office.

5.13 Semi-Annual Periodic Certification

Periodic certifications for all Federal programs paid staff takes place after-the-fact. The process takes place twice yearly. For multiple personnel on a single page the following procedure will be followed: The first one for the year takes place after December 30th and the second periodic certification takes place on or after the last day of school. This single page must be signed and dated with the appropriate date by the principal or other person who is knowledgeable of each person's work.

If the single periodic certification is used, then the principal or other person who is knowledgeable of the employee's work will complete the following process: The principal or other person who is knowledgeable of the employee's work will secure the necessary signatures for the first periodic certification in January and for the second periodic certification on or after the last day of school. The dates covered by the form will be included on the periodic certification. Both the employee and the principal will sign and date the periodic certification with the appropriate date. Then the periodic certifications will be turned in to the district office to the appropriate federal programs director to be kept on file.

5.14 Equipment, Real Property, and Inventory

The Federal Program Director collaborate with the Media Specialists to ensure that all equipment and items (filing cabinets, hardware, digital cameras) purchased through **Federal Programs** are necessary and allowable according to identified needs and budget restrictions. These items purchased utilizing federal funds with a useful life of one or more years are tagged and maintained on the system inventory and/or disposition list. Use is strictly monitored to meet program requirements. An on-site property inventory by district and/or school personnel is conducted on an annual basis.

An inventory of items purchased with a useful life of one year or more is maintained at the school and district level. An excel database is used to keep the inventory for system inventory. When property/equipment is purchased and received, a tag is attached to the item or it is marked in some fashion as to the fund (**i.e. Title I, Part A, Title I-C, Title II-A, and IDEA**) from which it was purchased. This information is also recorded on the inventory records. A list of inventories that is "signed out" to each teacher is kept up to date by the media specialists.

A physical inventory is taken once annually. Results of the physical inventory are compared to purchase orders of equipment that was purchased and assigned to various sites in the school district.

Any discrepancies with the inventory are addressed by the program director and the individuals at the school level.

Cirrus Academy Charter School has implemented appropriate guidelines for the purchase, acquisition, disposal, surplus, maintenance and inventory of equipment. Any inventory discrepancies are addressed and resolved.

Methods of communication with principals, school improvement specialists, school personnel, and others include large and small group meetings, formal and informal meetings, e-mail, text memorandum, or telephone. Communication is two-way, and the Program Directors meet on an annually basis with the Leadership Team to ask and answer questions or discuss concerns about funding, procedures, allowable expenses, or other requirements and technical assistance.

A Districtwide Federal Programs inventory is maintained on a spreadsheet by school and district that identifies the program funds used and FAIN number, describes the item, serial number, vendor, date of purchase, unit cost, location, condition, use, and disposition. Equipment purchased with federal funds is permanently marked with the name of the program funds used to purchase the item. For example, "Title I" and the fiscal year in which the equipment was purchased.

Equipment with an acquisition cost of less than \$5,000 which is at least five years old and no longer effective has been purged or transferred to another location.

Physical inventories are conducted annually. Cirrus Academy Charter School on-site physical inventory takes place in the spring of each year. Federal Programs personnel or a designee performs the inventory. The person conducting the inventory signs and dates the inventory check list to provide verification that the inventory was conducted.

In the event Federal Programs equipment or technology is stolen, the following procedure will be followed: (1) File an incident report with the police or SRO, (2) Attach the incident report to the Equipment Disposal Form and send to the Federal Programs office. (3) Make corrections to the Federal Programs Inventory and maintain notation of the incident for 3 years. (4) Send the updated inventory to the appropriate Federal Program Director, for example Title I, Part A.

In the event Federal Programs equipment or technology is lost, the following procedure will be followed: (1) Attach the incident report to the Equipment Disposal Form and send to the Federal Programs office. (2) Make corrections to the Federal Programs Inventory and maintain notation of the incident for 3 years. (3) Send the updated inventory to the appropriate Program Director, for example Title I, Part A.

Inventory

Inventory is maintained by the Technology Specialist on an annual basis. Inventory is documented in a database that is updated each time equipment is purchased. All federal programs property is identified by permanent markings on the equipment that signify the program and the fiscal year the equipment was purchased. The database identifies the program funds used and FAIN number, describes the item, serial number, vendor, date of purchase, unit cost, location, condition, use, and disposition. School personnel must annually conduct a physical inventory of the equipment. These

records are kept for three years. Damaged and inoperable equipment will be reported to the federal program director. Damaged and inoperable equipment will be returned to the Federal Program Director's office to be removed from the inventory. Records for items identified for disposition are maintained on the inventory for three years before final removal. A police report will be required for stolen property. Lost equipment will be verified by the principal and noted in the inventory. Designated school personnel attest that the equipment is as identified on the inventory record submitted to the Program Director. Technology personnel help determine the condition of equipment. When a piece of equipment needs to be disposed of, disposal forms are completed and kept on file. Disposal occurs according to the Cirrus Academy Charter School disposal procedures. Hard and electronic copies of the inventories are filed with the Program Director.

6. Within District Allocation Procedures

6.1 Identifying Eligible Students and Attendance Area Determination

Cirrus Academy Charter School is a schoolwide program. All students are served using Title I funds.

Eligible Attendance Area Worksheet

1. Federal Program Director gets with the Nutrition Director to review Direct Certification status of students receiving free lunch as well as the free lunch data collected annually.
2. The DCP determines that 60% or higher of Cirrus students are free and reduce lunch status and this determines Cirrus Students eligibility.

Rank Order Using Test Data: The Federal Program Director will:

1. Cirrus Academy does not rank order any students.

Ranking students for service in a Targeted Assistance School or for a Title I program where all students in the school are not served.

Cirrus Academy Charter School has no Targeted Assistance School currently. In the future if the district has a school which would require Target Assistance, this is the procedure we would follow.

In all schools selected to receive Title I, Part A funds under the Title I, Part A Every Student Succeeds Act (ESSA) Section 1113(c) that are ineligible for a schoolwide program or that choose not to operate such a schoolwide program, a local educational agency serving such school may use funds received under this part only for programs that provide services to eligible children identified as having the greatest need for special assistance. The following are adhered to in the district's targeted assistance plan:

- Restrict Title I, Part A resources to help eligible, participating meet the Georgia Performance Standards (GPS) standards that are expected of all students.
- Ensure that planning for students served under this part is incorporated into existing school planning
- Use effective methods and instructional strategies that are based on scientifically based research that:

- strengthen the core academic component of the school
- give primary consideration to providing or increasing extended learning time, such as an extended school year, before-and after-school, and summer programs and opportunities

Eligible children are identified by the school as failing, or most at-risk of failing, to meet the GA Doe’s challenging student academic achievement standards based on multiple, educationally related, objective criteria established by the district and supplemented by the school. Selection is based on the scores of more than one tests. The program has an academic component. Targeted assistance schools are required to separately identify Title I students. These schools must meet similar requirements of schoolwide programs, such as emphasizing accelerated curricula, scheduling extended learning time, using effective methods and instructional strategies that are scientifically research based, providing adequate professional development, and coordinating the Title I activities with other school reform activities. Students must be ranked using a multiple criteria selection process.

Reservations and Carryover

6.2 Procedures for Determining Carryover:

Title I Director tracks the spending of each program/ school through the year via budget sheets. At the end of the school year, carryover information is updated and reviewed. Family-School Partnership carryover is taken into consideration. Funds are redistributed based on GA DOE criteria. Copy of GA DOE enrollment report is placed in file.

6.3 Procedures for Determining Allocations:

After receiving notification of the Title, I, Part A grant amounts from GADOE, reservations in each budget are set aside for required components such as Family-School Partnership, professional learning, neglected and delinquent, private school per pupil and equitable services, and homeless students. Administrative costs are also part of the reservations, which are not part of the school per pupil amounts. Typically, requests for lesser amounts are submitted for professional learning for high quality teachers.

Per pupil amounts are allocated to schools in rank order of poverty based on the percent of children from low-income families who reside in eligible attendance areas. Low-income is determined by the number of free or reduced lunches or the direct certified children at a school as a percent of the previous year’s October FTE count. Higher ranking schools receive the same per pupil amount or more than the school ranked below those schools. The per pupil allocation is always large enough to provide a reasonable assurance that each school can operate its Title I program of enough scope and quality.

Typically, carryover funds are allocated in one of two ways: (1) to schools by increasing the per pupil amount maintaining rank order, basing that amount on the total number of children from low-income families in each area or (2) the funds are allocated back to all the schools on an equal basis and give each school an opportunity to spend the funds. Either way, schools must submit a written description of the expenditure requests and provide documentation that the request items are shown as a need in the school’s CNA and are included in the school’s improvement plan. Set asides are also

recalculated for private school per pupil amounts. Private school equitable services are also recalculated depending on an allocation of funds for district level activities. Monthly budget sheets are monitored regularly throughout the year and calculations are made from these near the end of the school year to determine that no more than 15% will be carried into the following year. Should carryover occur in private school set asides, those amounts will be added to the following year's private school set aside funds.

Title I, Part A funds are used to fund all schools in Cirrus Academy Charter School as Schoolwide Schools. Rank order by highest to lowest ranked poverty Schools. Even though Cirrus Academy Charter School has one school grades K-8, the District uses span Grade Span Grouping and serves these students in rank order when poverty is at or above 75%

Private Schools: Cirrus Academy Charter School currently has no Private Schools that have chosen to participate in the Title I program. The GA DOE requires each school district to annually complete a declaration of number of students served in private schools so that the private school allocation can be calculated. If Cirrus Academy Charter School ever has any Private School to choose to participate all Title I regulations for private school participation will be followed.

The district uses the information provided by the GA DOE to determine reservations for parental Involvement (1% required), Private Schools, indirect cost, and Neglected and Delinquent when applicable.

7. Professional Qualifications

Professional Qualifications/20 Day Notice

Highly Qualified is no longer required by or reported to United States Department of Education (USDE). Cirrus Academy Charter School follows ESSA qualifications:

- 1) ESSA says that State Education Agencies (SEAs) and Local Education Agencies (LEAs) must ensure teachers meet applicable state certification requirements [Sections 1111(g)(2)(J), 1112(c)(6)]. In Georgia, under OCGA § 20-2-2065, state certification can be waived for most teachers, meaning that each LEA that waives certification must establish professional qualifications (PQ) for their teachers.
- 2) ESSA says the SEA must report information on the qualifications of the teachers including out-of-field. How can my LEA ensure that teachers meet PQ and ESSA In-Field? Establish professional qualifications that take subject matter competency into consideration either by requiring certification or the GaDOE accepted equivalent.

Teachers of Special Education Students

- Special Education: Teachers required to hold special education certification must hold a clearance certificate and certification in adapted or general special education curriculum that aligns to the course(s) being taught and the IEPs of the students being served. They may NOT waive certification in adapted or general special education curriculum.
- Content: All special education teachers issuing grades are required to hold content area certification in the subject field and grade level bands for which the teacher is assigned (K-5),

(4-8), (6-12) in accordance with the cognitive level specified in the student's Individualized Education Plan (IEP).

- Charter Waivers: In Georgia, only teachers in LEAs that waive certification may verify content through degree, coursework, or content test; this must be in compliance with the LEA certification waiver procedures outlined in the Comprehensive LEA Improvement Plan (CLIP).
- Emergency/ Provisional: In accordance with Individuals with Disabilities Education Act (IDEA), special education teachers in Georgia may not hold emergency or provisional special education credentials. This means that a special education teacher holding a GaPSC Non-Renewable Professional (N), Waiver (W), or Supplemental Induction (SI) certificate may not meet Georgia's Professional Qualification Requirements.

Professional Qualifications for Paraprofessionals ESSA Sec.1111(g)(2)(M);

GaPSC Certification Rule 505-2-.18 The State of Georgia ensures that it has professional standards for all paraprofessionals working in any school, including qualifications that were in place on the day before the date of enactment of Every Student Succeeds Act. In Georgia and at Cirrus Academy Charter School a paraprofessional employed by Cirrus, must hold a clearance certificate and must meet one of the following requirements:

- Degree: Hold an associate degree or higher in any subject from a Georgia Professional Standards Commission (GaPSC)-accepted accredited institution; or
- Coursework: Have completed two (2) years of college coursework (sixty [60] semester hours) at a GaPSC accepted accredited institution; or
- Content Area Test: Have passed the GACE Paraprofessional Assessment. If eligibility is established through the assessment, the applicant must also hold a minimum of a high school diploma or GED equivalent.

8. Right to Know

Parents are informed of their rights to know the qualifications of their children's teacher. Parent notifications are required. Cirrus Academy Charter School will notify parents annually at the start of school (within 30 calendar days of the start of school) or upon enrollment. Cirrus Academy Charter School will use the ESSA language of the law and maintain records of the notifications.

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

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

Cirrus Academy Charter School will document the multiple formats of notification in order to ensure accessibility and, to the extent practicable, notifying in a language the parent may understand

(native language). The notification must contain the month/year of dissemination or, if included in another document, the primary document must contain a date. Cirrus Academy Charter School name is included in the notification. The Federal Programs Director will provide technical assistance to the Principal(s). The records of annual notifications from Cirrus Academy Charter School is maintained by the Federal Program Director and kept on file in the District's Board of Education Office.

9. Title I-A Family-School Partnership Program

Cirrus Academy Charter School believes that the charter school 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 charter schools and encourage Involvement in all areas of their children's educational experiences.

Parental Input

Input and suggestions from parents, family members, and community partners are an essential component of the district and school improvement plans that are developed each year. All parents of students eligible to receive Title I services are invited to attend two meeting opportunities described in this section to share their ideas and suggestions to help the district, schools, and students to reach our student academic achievement goals.

Annual Title I Am meeting

All Title I schools are required to hold an annual meeting in the spring of each year. This meeting provides an opportunity to tell parents about Title I and other federal programs and to share parent compacts/policies/school improvement plans etc. It is the responsibility of the principal in coordination with the Parent Engagement Coordinator to arrange meeting times and invite all stakeholders to the meeting. The Family-School Partnership Coordinator will be responsible for collecting and submitting documentation of the required Title I annual meeting, including a copy of the sign in sheet, agenda, and minutes to the Title I Director. The school hold the Title I meetings in conjunction (at an earlier time) with open houses or PTA meetings, curriculum meetings, and assessment meetings. Meetings are also announced via paper copies to parents, websites, call system, and marquees at each school.

Correspondence in Other Languages

When parents mark on the enrollment form that they need correspondence in another language, to the extent practical, efforts are made to provide either written support or support through an interpreter. The ESOL teacher supports these efforts as well as school staff who are fluent in multiple languages.

Parental Engagement Coordination and Implementation Procedures

Cirrus Academy Charter School maintains the following documentation that ensures the six requirements of parental Involvement are offered:

- Meeting agendas and sign-in sheets
- Newsletter articles
- Letters to parents

- Parenting classes

The Parental Engagement work begins in May of each year by reviewing the evaluations of each event. Based on the evaluations and the end of year survey, events and activities for the next year are planned and designed to remove barriers for parents.

Parents are notified via email, an automated calling system, regular mail, phone calls, schools/district website, and flyers sent home in student/parent communication folders. Information is also given out during the Annual Meeting and parent workshops.

Parents’ Engagement in Planning, Revision, and Implementation

Parents are informed by written notification that they have the right to participate and become Involved in the decision-making process at Title I schools. All parents are invited to participate and to provide input into deciding on activities, School Improvement Planning, Schoolwide Plan revisions, and the Comprehensive Improvement Plan. These processes are in place to ensure parents play an active role in improving student academic achievement.

Parental Engagement Activities - Planning, Revision, and Implementation Steps:

Provide Annual Notification to Parents: Cirrus conducts a meeting at the beginning of each year inviting parents to participate in the planning process. Distribute to parents via mail, email, telephone, flyers, website, and newsletters.

Conduct Annual Survey at the School: The annual surveys serve as the means for parents to become Involved in planning parental Engagement activities. Surveys are conducted in May to assist in making the determination of the activities for the year. Distribute to parents via mail, email, telephone, flyers, website, and newsletters.

Evaluate Results of the Survey: Use this information to determine specific needs of the parents. Distribute to parents via mail, email, telephone, flyers, website, and newsletters.

Conduct District Annual Survey: At the end of each year, the district conducts an annual survey that allows for parent input. This information is analyzed by school and allows for district input for parents.

Maintain: This documentation will include sign-in sheets, agendas, meeting minutes, and emails to and from parents.

School Improvement Plan Planning, Revision, and Implementation -Steps:

School Improvement Plans are updated annually. Parents are a required component in planning, revision, and the implementation process. Parents are sent information inviting them to participate via mail, email, telephone, flyers, website, and newsletters. Once revisions are made, the plan is placed on the website. Hard copies are also available at the schools.

Maintain: This documentation will include sign-in sheets, agendas, meeting minutes, and emails to and from parents.

Schoolwide Plans Planning, Revision, and Implementation - Steps

Schoolwide Plans are updated annually. Parents are a required component in planning, revision, and implementation process. Parents are sent information inviting them to participate via mail, email, telephone, flyers, website, and newsletters. Once revisions are made, the plan is placed on the website. Hard copies are also available at the schools.

Maintain: This documentation will include sign-in sheets, agendas, meeting minutes, and emails to and from parents.

LEA Comprehensive Improvement Plan

The LEA Comprehensive Improvement Plans is updated annually. Parents are a required component in planning, revision, and implementation process. Parents are sent information inviting them to participate via mail, email, telephone, flyers, website, and newsletters.

Parent input is requested via meetings, via mail, email, telephone, flyers, website, and newsletters.

Maintain: This documentation will include sign-in sheets, agendas, meeting minutes, and emails to and from parents.

Cirrus Charter School Title I Family-School Partnership Policy Overview

Cirrus Academy Charter School has an on-going commitment to our Title I parents. Parental Engagement is defined as the participation of parents in regular, two-way, and meaningful communication involving student academic learning and other school activities. Our goal is to ensure that our Title I parents and their children receive extraordinary services and assistance that will lead to improved academic achievement. The district recognizes that parents are an integral part of a child's success in school, starting with the concept of being the child's first teacher. As a conduit for their children's success, the district will assist parents of all socioeconomic levels in the solidifying their ongoing commitment to their child's success. It has become evident that a parent can be the foremost factor in ensuring that their children accomplish and excel in the goals they set. Studies (A New Wave of Evidence: The impact of School, Family and Community connections on Student Achievement, 2002) have shown that students with Involved parents, no matter what their income or background, are more likely to:

- Earn high grades and test scores and enroll in higher level programs;
- Pass their classes, earn credits and be promoted;
- Attend school regularly; and
- Graduate and go on to high school and later post-secondary education

The goal of Cirrus Academy Charter School is that parents of Title I children will be actively Involved in the development and review of the Title I Parent Engagement Plan. The district provides coordination, technical assistance, and other necessary support in the planning and implementation of Family-School Partnership activities. The district encourages Parent Engagement and supports the partnership between home, school, and community by providing information about curricular expectations, student performance, and providing training and materials for parents to help their children.

Parent Capacity

Cirrus Academy Charter will build partnerships between its families, and community with the goal of developing mutual support for student achievement. To develop capacity for this support, Cirrus will implement a variety of family and community engagement initiatives. Cirrus has a Success Team through the Georgia Charter School Association who is providing all teachers with Professional development to improve Literacy, Content Development, Differentiation of Instruction, and increase proficiency on the Georgia Milestones

Of Parents – Cirrus Academy will provide families with information about the overall Title I program and its requirements. Cirrus will work with its Title I school to help families understand academic expectations for student learning and progress. Specific information related to Success Team, the State's challenging academic standards, and local and state assessments—including alternative assessments, will also

be provided. Cirrus also offers assistance to parents in understanding use of its online student information system and other digital resources, including the harms of copyright piracy, through its technology specialists. Notifications about these opportunities will be posted on the Cirrus website and shared through school messaging systems, newsletters, and social media postings.

In addition, Cirrus websites contain resources and materials such as parent guides, study guides, practice assessments, and Success Team materials for at-home learning. Hard copies of these materials are also available at Cirrus Academy, including copies in Spanish.

Cirrus Academy Charter School Parent Teacher Student Organization (PTSO), made up of parent representatives, teacher representatives, and student representatives advises Cirrus Academy Charter School on all matters related to family engagement. Community leaders and business partners are also invited to serve on the PTSO. The participation of all our partners is encouraged through video conferencing and recording options to accommodate varying schedules.

Cirrus Academy Charter School will coordinate and integrate the family engagement programs under this part with parent and family engagement strategies, to the extent feasible and appropriate, with other relevant Federal, State, and local laws and programs. Cirrus will invite faculty and staff from those programs to attend planning meetings focused on family engagement activities. In the spring, schools will host Kindergarten Ready days, Middle and High School Transition Nights, so parents may receive information to help prepare them and their children for the next life stage.

Of School Staff – Cirrus Academy will conduct four trainings during the school year for the assistant principal and school staff to learn and discuss strategies to increase family engagement, improve school-family communication, and build ties with parents and the community. These trainings will be redelivered to the faculty and staff of Title I school.

To ensure that information related to district, school, parent programs, and activities is available to all parents, each Title I school is required to send home and post online information for parents and family members in an understandable language and uniform format. At the beginning of the year, school staff will be trained on parent notifications and resources to be sent home in parents' preferred language, where applicable, and providing interpreters at parent events on the district website will be translated to the extent practicable. Cirrus will also utilize school phone call systems, district and school websites, local news media, and social media to post information for parents.

Parent Engagement Procedures/Expectations
SCHOOL LEVEL PARENTAL INVOLVEMENT

Title I, ESSA

Section 1118, ESSA

Each Title I school will develop a Parent Engagement plan that gives additional attention to the area indicated below:

1. Develop jointly with, and distribute to, parents of participating children a written policy describing implementation of the requirements in a language that is simple, concise and jargon-free and updated periodically to meet the changing needs of parents and the school, and such policy is made available to the local community.
2. Convene an annual meeting, at a convenient time, to which all parents of participating children shall be invited and encouraged to attend, to inform parents of their school's participation under Title I and to explain Title I, its requirements, and their right to be Involved.
3. Offer meetings using a flexible schedule, such as meetings in the morning or evening, and may provide, with funds provided under Title I, transportation, childcare, or home visits as such services relate to parental Involvement to eliminate Family-School Partnership barriers.
4. Involved parents, in an organized, ongoing, and timely way, in the planning, review, and improvement of programs under Title I, including the school parental Involvement policy and the joint development of the schoolwide program plan under section 1114(b), except that if a school has in place a process for Involving parents in the joint planning and design of its programs, the school may use that process, if such process includes an adequate representation of parents of participating children.
5. Provide parents of participating students timely information concerning:
 - a. Title I program in the school.
 - b. Results of the annual school review including school performance profiles.
 - c. Individual student assessment results and interpretation of those results.
 - d. A description and explanation of the school curriculum.
 - e. The assessments used to measure student progress and the proficiency levels the students are expected to meet.
 - f. Opportunities for regular meetings to formulate suggestions, share experiences with other parents and participate as appropriate in decisions relating to the education of their children.
 - g. Provide timely responses to parent suggestions.

- h. Collect all unsatisfactory parent comments regarding the Schoolwide Plan and attach those comments to the School wide Plan when submitted to the LEA.
- 6. Aid participating parents in such areas as understanding the:
 - a. State's content standards and student performance standards.
 - b. School improvement and corrective action process if applicable.
 - c. Components of a schoolwide program if applicable
 - d. Components of a targeted assistance school program if applicable.
 - e. State and local assessments.
 - f. Requirements of Title I, Part A
 - g. Ways parents can monitor their children's progress and work with educators to improve the performance of their children.
 - h. Ways parents can participate in decisions relating to the education of their children.
- 7. Provide materials and training such as:
 - a. Coordinating necessary literacy training and using technology from other sources to help parents work with their children to improve their children's achievement.
 - b. Training to help parents work with their children to improve their children's achievement.
- 8. Educate teachers, pupil services personnel, principals and other staff, with the assistance of parents, in the value and utility of contributions of parents, and in how to reach out to, communicate with, and work with parents as equal partners, implement and coordinate parent programs, and build ties between home and school.
- 9. Coordinate and integrate Parent Engagement programs, activities and strategies with Head Start, Title I-B, Migrant, Title I-C, Homeless, Vocational Education, and Home Instruction Programs for Preschool Youngsters, Parents as Teachers Program, Public Preschool Programs and other programs, to the extent feasible and appropriate.
- 10. Develop appropriate roles for community-based organizations and businesses in Family-School Partnership activities, including providing information about opportunities for organizations and businesses to work with parents and schools, and encouraging the formation of partnerships between elementary, middle, and secondary schools and local businesses that include a role for parents.
- 11. Conduct other activities, as appropriate and feasible, such as parent resource centers and opportunities for parents to learn about child development and child rearing issues beginning at the birth of a child, that are designed to help parents become full partners in the education of their children.
- 12. Involved parents in an on-going end of year assessment to evaluate the effectiveness of the Family-School Partnership initiatives as a measure of performance evaluations of the school.

13. To the extent practicable, provide full opportunities for the participation of LEP parents, parents of migratory children, and parents with disabilities including providing school profiles and information related to school and parent programs, meetings, and other activities in a language and format such parents understand.
14. Provide other reasonable support for parental Involvement activities as parents may request.
15. Involved parents in the joint development of the school-parent compact that outlines how parents will be responsible for supporting student learning.
16. Describe the school's responsibility to provide high-quality curriculum and instruction in a supportive and effective learning environment that enables the children to serve under Title I to meet the State's student performance standards.
17. Explain the ways in which each parent will be responsible for supporting their children's learning, such as monitoring attendance, homework completion, and television watching; volunteering in their child's classroom; and participating, as appropriate, in decisions relating to the education of their children and positive use of extracurricular time.
18. Address the importance of communication between teachers and parents on an ongoing basis through, at a minimum-
 - a. Parent-teacher conferences in elementary schools, at least annually, during which the compact shall be discussed as the compact relates to the individual child's achievement.
 - b. Frequent reports to parents on their children's progress.
 - c. Reasonable access to staff, opportunities to volunteer and participate in their child's class, and observation of classroom activities.
19. Distribute and collect a copy of parent-school compact to parent.

Parent Engagement Surveys

Process to Collect: The annual survey is provided to schools after parents have reviewed and made suggestions for improvement of the survey. Schools typically choose a brightly colored paper on which to print all Title information, including the survey, which are also posted on the website. Advertisement of the survey and requests for completion occur through the newspaper, website, parent flyers, Facebook and local newspaper. The surveys are collected and compiled, and the following year's Family-School Partnership activities are built from the responses. Family-School Partnership Coordinators are encouraged to use volunteers to help compile survey results.

Process to Review: The results of the surveys are shared among several groups of stakeholders, including, but not limited to, parents, school and central office administration, and Family-School Partnership Coordinators. School councils/Title I advisors and those attending the annual Title I am meeting review the results of the surveys while reviewing and revising the schoolwide and Family-School Partnership plans and components.

Actions Taken by Cirrus to Improve the Quality and Effectiveness of Parent Engagement Policies and Practices: Title I Parent Engagement Coordinator reviews the annual spring survey as well as the results from the previous spring surveys. Additions/deletions/revisions are discussed and agreed upon during this meeting. The formatting or revisions are made after the meeting and then sent back to advisors for comment. If no further suggestions are made, the surveys are sent to parents without being embedded in other materials.

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

- Annual meetings
- Conferences
- E-mail communications
- Phone calls
- Parent workshops and activities
- Family Literacy nights
- Volunteering
- Parent advisory meetings
- Open Houses
- Annual notification of CCRPI status
- Newsletters/flyers/brochures
- Website information
- Board of Education meetings

Parent Resource Centers

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

Schools are required to notify parents of the availability of the hours to access the resources which are located at the school. This is typically achieved through a flyer and/or website and includes information on the types of resources available.

10. School Improvement 1003(a) (84.010)

When Cirrus Academy is awarded School Improvement funds Cirrus will use interventions applied under Title I, Part A Section 1003 (School Improvement) are required to show strong, moderate, or promising evidence to support them.

11. School Improvement 1003(g) SIG (84.377)

When Cirrus Academy is awarded School Improvement funds Cirrus will use interventions applied under Title I, Part A Section 1003 (School Improvement) are required to show strong, moderate, or promising evidence to support them.

12. Service for Homeless Children and Youth

Purpose of the Program

Homeless children and youth will be provided the opportunity to receive a free and appropriate public education regardless of their residency status. The program will ensure that these students are afforded equal access to academic and other services that will allow them to meet the same challenging state achievement standards as non homeless students.

The program provides procedural guidelines to ensure that homeless students are not denied enrolment due to the lack of registration documentation at the time of enrollment. Homeless children and youth, including preschool age children, will be enrolled immediately pending obtainment of necessary documents. The school counselor will assist parents, guardians or unaccompanied youth in obtaining the proper documentation.

The homeless education program makes every effort to provide homeless children and youth with a stable school environment by enrolling students in the *school of origin* and providing them with transportation to and from *the school of origin*. Provisions are made for parents, guardians, or unaccompanied youth to decline enrollment in the *school of origin*.

The program provides for a homeless liaison who will ensure program implementation and coordinate efforts to ensure that homeless children and youth, including preschool age children are provided the opportunity for academic success.

Identification and Registration Procedures

Homeless children and youth are often undetected; therefore, the system will use a **Residency Questionnaire** to facilitate identity of homeless children and youth, as well as preschoolers. The parent, guardian, or unaccompanied youth will complete the **Residency Questionnaire** at the time of registration. The school counselor may provide appropriate assistance to the parent, guardian, or unaccompanied youth in answering the questionnaire if necessary.

A copy of the Residency Questionnaire must be submitted to the Office of the Homeless Liaison on the day of registration. The school will maintain the original form in a file separate from the student's permanent record for audit purposes during the year. This file should be housed in the school counselor's office.

The parent or guardian may enroll a homeless child or youth with or without proof of residency, birth certificate, social security number, immunization record, or school records. The school counselor will provide the parent, guardian or unaccompanied youth appropriate assistance in obtaining the necessary records and documents for enrollment. Enrollment without the required immunization record will be pending receipt or acquisition of immunization documentation. The existing method of assigning a student number will be utilized when a student enrolls without a social security number.

An unaccompanied youth may enroll himself/herself. In this case, the school principal or designee will immediately contact the Central Office Homeless Liaison to report the enrollment of an

unaccompanied youth. The school will provide the youth with proper assistance in language that the student understands. The Central Office Homeless Liaison will assist the homeless unaccompanied youth in obtaining eligible educational services. The application process for free and reduced priced meals can be expedited for homeless children and youth. The determination for free meals may be made without completing the full application process.

Identification of Homeless Preschoolers

The Central Office Homeless Liaison will collaborate with local community service agencies (e.g. Head Start, Department of Human Resources, Health Department, faith based organizations and the court system, etc.) and school personnel to identify homeless preschoolers. The system will also include homeless preschoolers and children in the “Child Find” process as required by the Individuals with Disabilities Act.

School Placement

The school system will make school placement decisions in the “best interest” of the homeless child or youth. Students will continue in the *school of origin* for the duration of homelessness when a family becomes homeless between academic years or during an academic year; or for the remainder of the academic year if the child or youth becomes permanently housed during an academic year. Students may enroll in any public school that non homeless students who live in the attendance area in which the student is actually living are eligible to attend.

If school enrollment decision is contrary to the wishes of the child or youth’s parent/guardian, the school will provide the parent/guardian or unaccompanied youth with a written explanation of the decision, a statement of the right to appeal, and the procedure for appealing the placement decision. The complainant must file a School Enrollment Dispute Form with the school in which the student is presently enrolled. The principal of this school will notify the Central Office Homeless Liaison of the dispute and take steps to resolve the dispute.

When a dispute arises regarding school placement, the system will immediately enroll the homeless student in the school in which enrollment is sought by the parent/guardian or unaccompanied youth, pending resolution of the dispute. The Central Office Homeless Liaison will expeditiously take steps to resolve the dispute following the district dispute resolution policy in conjunction with the adopted grievance policy if the dispute cannot be resolved locally, the parent or guardian may request a review of the State Superintendent, Georgia Department of Education.

Homeless Education Liaison:

The homeless liaison shall work to ensure that homeless children and youth, including preschoolers are identified, enrolled in school, and receive all eligible services facilitate student academic success. The responsibilities listed below are not all inclusive but shall be primary duties of the liaison.

The homeless liaison shall ensure that:

- Homeless children and youth are identified by school personnel and through coordination activities with other entities and agencies;
- Homeless students enroll in, and have full and equal opportunity to succeed in, the school of the district;

- Homeless children and youth receive educational services for which they are eligible, including Head Start, and preschool programs administered by the school district, and referrals to health, mental health, dental and other appropriate services;
- Parents of guardians of homeless children and youth are informed of educational and related opportunities available to their children, and are provided with meaning opportunities to participate in the education of their children;
- Parents and guardians and unaccompanied youth are fully informed of all transportation services, including transportation to and from the school of origin, and are assisted in accessing transportation services;
- Transportation cost disputes between the school system and school system of enrollment are resolved;
- Sensitivity and confidentiality training is provided to transportation and school personnel regarding the needs of homeless children and youth;
- Enrollment disputes are mediated in accordance with the requirements of the McKinney-Vento Act;
- Public notice of educational rights of homeless students is dismissed to locations where children and youth receive services under Act;
- Required reports concerning the homeless education program are submitted appropriate agencies and the State Department of Education;
- Evaluation of the homeless education program is conducted annually and necessary program and implementation adjustments are made in a timely manner.

To meet compliance with ESSA Cirrus has identified a Foster Care point of contact (POC) and submitted a Foster Care Transportation Plan to GA DOE.

Cirrus Academy Charter School:

- Coordinate with the child welfare agency POC on the implementation of the Title I provision.
- Develops and coordinates local transportation procedures;
- Manages best interest determinations and transportation cost disputes; and
- Facilitates the transfer of records and immediate enrollment;
- Facilitate the data sharing with the child welfare agencies, consistent with FERPA and other privacy protocols;

- Leads the development of a process for making the best interest determination;
- Documents the best interest determinations;
- Ensures that children in foster care are enrolled in and regularly attending school; and
- Provides professional development and training to school staff on the Title I provision and educational needs of children in foster care, as needed.

13. Services for Neglected and Delinquent Children (NA currently)

Consultation occurs between the Federal Program Director and the N & D program. Funding for students residing at the institution is based upon the number of students residing in the institutions for neglected children. The funding, calculated from the Annual Neglected and Delinquent Survey, provides the GADOE with current information on the location and number of children living in the institution for neglected children. The information is used to compute the Title I neglected or delinquent allocations for school districts so that eligible children in the institutions can be provided Title I funded educational services.

The annual survey includes children and youth who are ages 5 through 17 years and live in the institution for at least one day during a 30 consecutive day counting period with at least one day of the counting period being in October. Funding is also to ensure that neglected children, those in need of care due to abandonment, neglect, or death of their parents or guardians, can meet the state's challenging academic content and student achievement standards. The Department of Human Resources (DHR) serves youth who are committed to or voluntarily placed in their custody due to abandonment, neglect, or the death of their parents or guardians.

Neglected and Delinquent students are identified through surveys from community agencies, telephone, and online contact with state and local facilities, and through the local coordinator. The information is collected on an annual basis and visits are made to the local facilities or juvenile justice agencies.

14. Prevention and Intervention Programs for Children Who Are Neglected, Delinquent, or At-Risk Title I-D Subpart 2 (NA at this time)

The district does not have any Title I-D Subpart 2 facilities currently.

15. Services for Foster Care Children

Cirrus will meet new requirements regarding foster care based on provisions of Every Student Succeeds Act of 2015 (ESSA). On December 10, 2016, the term "awaiting foster care" was removed from McKinney-Vento law. Students in foster care will no longer be considered homeless. ESSA places new requirements on the education system to ensure the educational stability of children and youth in foster care. Additionally, ESSA mandates the collaboration among Local Education Agencies (LEAs) and the local child welfare agency specifically surrounding best interest determinations and transportation for children and youth in foster care.

16. Title IV, Part A

Title IV, Part A is Implemented According to the Following Guidance:

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

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

1. The first purpose of the SSAE program is to provide all students with access to a well-rounded education.
 - Well-rounded education means courses, activities, and programming in subjects such as English, reading or language arts, writing, science, technology, STEAM, mathematics, Spanish, civics and government, arts, history, geography, computer science, music, career and technical education, health, physical education, and any other subject, as determined by the State or local educational agency, with the purpose of providing all students access to an enriched curriculum and educational experience.

Allowable Activities for Well-Rounded Educational Opportunities - Programs and activities that support a well-rounded education may include:

- Counseling programs
- Music and the arts
- Science, technology, STEAM, and mathematics,
- Accelerated learning programs
- Foreign language instruction
- Programs and activities that integrate literacy across multiple disciplines
- Other programs that support well-rounded education experiences

STEAM—Activities may include:

- Increasing access for groups of underrepresented students to high-quality courses;
- Supporting participation in nonprofit competitions (e.g., robotics, science research, math competitions, etc.);
- Providing students with hands-on learning and exposure to STEM to enhance the student's understanding of STEAM subjects; and
- Integrating other academic subjects, including the arts, into STEM subject programs to increase participation in STEAM subjects, improve attainment of skills related to STEAM subjects, and promote well-rounded education. PITSCO to assist with STEM implementation across the curriculum.

Accelerated Learning Programs—Activities may include:

extended day for grades k-8, increase learning time, summer remediation

Prohibitions in ESEA, Title IV, Part A

- No funds under this title may be used for medical services or drug treatment or rehabilitation, except for integrated student supports, specialized instructional support services, or referral to treatment for

impacted students, which may include students who are victims of, or witnesses to, crime or who illegally use drugs.

- No child shall be required to obtain a prescription for a controlled substance, as defined in section 102 of the Controlled Substances Act (21 U.S.C. 802) as a condition of—
- receiving an evaluation or other service described under this title;
- attending a school receiving assistance under this title.

Question: May an LEA use funds to pay for accelerated learning examinations taken by low-income students?

Answer: Yes. Consistent with section 4107(a)(3)(D)(I), an LEA may use funds to reimburse the costs of accelerated learning examinations for low-income students. Under the special rule in section 4107(b) of the ESEA, an LEA may use FY 2017 funds to cover part or all the fees for AP, IB, or other accelerated learning examinations taken by low-income students in both the 2016-2017 school year and 2017-2018 school year.

2. The second purpose of the SSAE program 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. Schools have made significant progress toward improving school safety, and on many measures, schools are safer than they have ever been, however significant challenges remain.

Allowable activities under Safe and Healthy Students may be categorized by topic into three areas:

- Safe and Supportive Schools
- Student Physical and Mental Health
- Cross-Cutting Activities

ESSA provides LEAs with numerous options for enhancing their efforts to provide students and school staff with a positive school climate, which in turn can promote academic achievement, including:

- Preventing bullying and harassment
- Relationship building skills
- School dropout prevention
- School readiness and academic success
- Child sexual abuse awareness and prevention
- Reducing use of exclusionary discipline practices & promoting supportive school discipline
- Suicide prevention

Allowable Activities to Support Student Physical and Mental Health Schools that support the physical and mental health of their students increase the likelihood of students' academic success. Allowable activities include:

- Drug and violence prevention
- Health and safety practices in school athletic programs
- School-based health and mental health services
- Healthy, active lifestyle
- Nutritional education
- Physical activities
- Trauma-informed classroom management

- Preventing use of alcohol, tobacco, smokeless tobacco, electronic cigarettes
- Chronic disease management

Allowable Cross-Cutting Activities - The SSAE program presents an opportunity for LEAs and schools to promote safe, healthy, and affirming school environments that are inclusive of all students. Some examples are: • Mentoring and School Counseling • Schoolwide Positive Behavioral Interventions and Supports • Pay for Success Initiatives

1. The third purpose of the SSAE Grants is supporting the effective use of technology. SSAE grants are intended to improve students’ academic achievement by increasing the capacity of State educational agencies (SEAs), local educational agencies (LEAs), and local communities to improve the use of technology in order to improve the academic achievement and digital literacy of all students.

Allowable Activities to Support the Effective Use of Technology – The SSAE program funds may be used to provide educators, school leaders, and administrators with the professional learning tools, devices, content and resources to do the following activities, among other allowable uses: • Provide personalized learning; • Discover, adapt and share high-quality resources; • Implement blended learning strategies; and • Implement school- and district-wide approaches to inform instruction, support teacher collaboration, and personalize learning.

Funds can also be used to: • Help educators learn how to use technology to increase the engagement of English Learner (EL) students; • Develop or implement specialized or rigorous academic courses using technology, including assistive technology; and • Support professional learning for STEM, including computer science.

Meeting the Needs of Students with Disabilities: • Schools must make assistive technology available to students with disabilities when that technology is necessary to provide access to the curriculum for the student to receive a free appropriate public education (FAPE) under the Individuals with Disabilities Education Act and section 504 of the Rehabilitation Act. • When SSAE funds are used to provide technology to students without disabilities, the benefits provided by that technology must also be made available to students with disabilities in an equally accessible and equally integrated manner.

Internet Safety Provisions: No funds made available under Title IV, Part A to an LEA for an elementary or secondary school that does not receive E-Rate funds may use to purchase computers used to access the Internet, or to pay direct costs associated with accessing the Internet, for such a school unless the school, school board, LEA, or other authority responsible for administration of such school that has in place a policy of Internet safety as outlined in ESEA Section 4121.

17. Title V, Part B – Rural and Low Income

Purpose

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

Use of Funds

Cirrus Academy Charter School is in an intercity area and do not receive any RLIS funds.

18. Title III, Part A – Language Instruction for English Learners (EL) and Immigrant (IMM) Students

Title III, Part A: All Procedures and documentation for Title III (NA currently)

Title III is a federally funded program that provides eligible Local Education Agencies with funding to supplement those ESOL services already in place. School districts with large EL populations receive direct Title III allocations, while school districts with lower incidence populations are grouped into the “Georgia Title III Consortium”. The Title III Consortium allows these “low-incidence” districts to access Title III funds typically available only to districts with greater numbers of ELs. Both ESOL and Title III hold students accountable for progress in, and attainment of, English language proficiency. Upon attainment of English language proficiency, students exit from supplemental language services. Cirrus Academy Charter School does not have any Title II students are ESOL students at this time.

Identification and Recruitment: Students are identified through an Occupational Survey (*see appendix H*). The survey form is included in the student enrollment packet. Families complete the survey each new school year and report the findings to the Federal Program Director. The survey is also provided for any new students that enroll throughout the school year

The Registration Process:

1. Parents/Students are given a new student registration packet, written in their native/primary home language and English. If needed, a translator is available. The translator will ask questions and record responses on both forms. The packet includes registration documents, school information, student handbook, and a nutrition application in the primary home language.

2. Included in the Student Registration Packet is a Home Language Survey. The Home Language Survey includes the following questions:

- Which language does your child most frequently speak at home?
- Which language do adults in your home most frequently use when speaking with your child?
- Which language(s) does your child currently understand or speak?
- If possible, would you prefer notice of school activities in a language **other than** English? If yes, which language?

If the Home Language Survey reveals that a **Primary or Home Language, Other than English (PHLOTE)**, is spoken in the home, then the student is eligible for ESOL Screening with the W-APT.

3. Additionally, parents are asked on the system registration form about prior ESOL Services, date of entry into the United States, and date of entry into a United States School.

Records and Maintenance: The ESOL teacher and the SIS Coordinator maintain, update, and properly code all required enrollment, and educational data in Cirrus Academy Charter School Student Information System.

Instructional Programs: Cirrus is required to send notification, in a language and format appropriate for the reader, to parents of ELs who have been selected to participate in the Title III. This notice also permits the parent to waive participation in the Title-funded services. Instructional programs must ensure they are effective and demonstrate success in increasing the English language proficiency and student academic achievement of students participating in the programs.

Professional Development: The Title III staff, along with ESOL and non-ESOL staff participate in professional learning opportunities that are designed to improve the instruction and assessment of EL’s.

EL Parent, Family and Community Engagement Activities: In addition to the Parent / Family Engagement activities provided to all parents and families of students in the schools, the ESOL teacher meets with the parents of EL’s to ensure that their needs are met and they have the ability to help their students achieve academic success. Information is provided in a language and format that is appropriate.

Services for EL Students

Purpose: An ESOL program plan is designed to provide consistent and non-discriminatory procedures throughout each school within Cirrus Academy Charter School as recommended by the U.S. Office for Civil Rights, Department of Education. The Civil Rights Acts of 1964 requires local school districts to provide an alternative program of service when there are students who are limited English proficient and are unable to participate effectively in the district's regular instructional program.

English to Speakers of Other Languages (ESOL) is a state-funded instructional program for eligible English Learners (ELs) in grades K-12. Cirrus Academy has EL students that are served by an ESOL teacher who integrates ELD standards with the Georgia Standards of Excellence to enable ELs to both communicate in English and demonstrate their academic, social, and cultural proficiency. Instructional approaches, both in ESOL and general education classes, ensure that the needs of the ELs are accommodated. Students are served using the PUSH-IN and PULL-OUT methods.

Coordination of Efforts:

ELL: Cirrus Academy Charter School collaborates with the schools to monitor mobility/identification and needs of the ELL population. As these students enter the school sites, registrars ask a series of questions in conjunction with the Home Language Survey to access the status of students. Following the initial interview, appropriate staff members meet with the students and families and the previously named agencies to determine student/family needs and a plan to meet the needs. Among the educational services offered to these students are regular education setting, Remedial education services, special education services, English language learner services, and mentoring/counseling services. Students are administered the appropriate screening tests and interviewed to determine needs. Teachers report academic achievement to the specific parties and parents on an ongoing basis. Additionally, the social worker monitors and reports status to other necessary agencies throughout the school year. Title III Consortium funds are used for supplies and materials in addition to those previously named.

Immigrant: Cirrus Academy Charter School does not have any immigrant students currently. If these students should enter the school sites, registrars would ask a series of questions in conjunction with the Home Language Survey and occupational survey to access the status of students. Following the initial interview, the appropriate staff would meet with the students and families and the previously named agencies to determine student/family needs and a plan to meet the needs. Among the educational services offered to these students are regular education setting, Remedial education services, special education services, English language learner services, and mentoring/counseling services. Teachers would report academic achievement to the specific parties and parents on an ongoing basis. Additionally, ESOL teacher would monitor and report status to other necessary agencies throughout the school year.

Assessment of ESOL Eligibility – WIDA-ACCESS Placement Test (W-APT) When applicable:

Students who answer any one of the PHLOTE questions with a language other than English shall be administered the WIDA-ACCESS Placement Test (W-APT) within the first 30 days of enrollment to determine their English language proficiency level.

The W-APT measures a student's listening, speaking, reading, and writing abilities in both social and academic skill areas. Language assessment results and documentation from other states may be considered when enrolling students. A student is limited to only one administration of the W-APT. 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.

Responsibilities and Procedures Following Identification: Once eligibility has been determined, ESOL teachers complete and collect in the student's ESOL folder and provide the following forms of documentation:

Parental Notification of Services: This form is completed in English and the native/primary home language annually with information containing current test scores, graduation rates, and exiting criteria. Currently, the parent/guardian also has the choice to waive English language services for their child. See the Parental Waiver of ESOL Services section for more information.

- EL Student Testing Participation Committee Documentation with available Accommodations.
- Language Assessment Conference documentation (when applicable)
- Evaluation of Classroom Performance (when applicable)
- Monitoring forms (when applicable)

The ACCESS for ELLs 2.0: will be administered to all English learners each school year. Continued eligibility will be determined based on the results.

Assessment of ESOL Continued Eligibility/EXIT Criteria- ACCESS for ELLs 2.0: The ACCESS for ELLs is administered annually to all English learners in Georgia. It is a standards-based, criterion referenced English language proficiency test designed to measure English language learners' social and academic proficiency and progress in learning 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.

EL's must score a CPL of 5.0 or higher to exit language services.

ESOL and Permanent Record Folders: Student information will be kept in identifiable ESOL folders that should be completed each year. Biographical and ESOL service information, classroom performance, and assessment scores should be included in each student's folder each year.

Monitoring Students: Monitoring the success of English learners who have exited the ESOL program is vital for sustained proficiency. Upon reaching ineligibility, students are monitored for two academic years.

Monitored Students (EL-M): ESOL teachers are responsible for monitoring EL-M. The ESOL teacher will collect information using the Monitoring Form for Exited ESOL Students.

Monitored EL student are eligible for *standard* accommodations in the regular classroom and on state standardized testing.

Former ESOL (FELP): Upon the completion of the monitoring status, the student is exited from the ESOL program.

Procedures Regarding Parental Waiver of Direct ESOL Services

Some parents of students identified as ELs may choose to waive language assistance services for their child; however, school districts are still held responsible for providing language support under Office for Civil Rights law. The district must find alternate means of providing the student with support for language development and proficiency outside of structured ESOL classes. Parents who waive services must do so in writing on an annual basis and the district must maintain evidence of the written documentation. A form for waiving services is available in the Form Bank under the Georgia Guidance link on the Ga DOE ESOL & Title III webpage. 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 their English language proficiency skills must be assessed on an annual basis until they meet eligibility criteria.

Procedures for Equipment Inventory Purchased with Title III Funds

Inventory & Property Management

Inventory of all equipment and property belonging to any Federal program with a value equal to or greater than \$50 or can easily be pilfered will be identified and inventoried on an annual basis. Items identified to be inventoried will be labeled and will be verified by a designee of the building-level or program administrator each year. The completed and signed inventory is submitted to the Director/Coordinator of each Federal Program. Materials purchased for use in Federal programs are to be utilized in the capacity for which they were

purchased. Any equipment, materials and/or supplies purchased with Federal funds are considered solely for the use of that program.

Title III inventory is documented in a database that is updated each time equipment is purchased. All Title III property is identified by a specific Title III label or marking. The database includes a description of the item, serial number, FAIN number, vendor name, date of purchase, funding (Title III), cost, school, equipment location, and current condition. School principals must annually verify the location and condition of the equipment.

Procedure for Use of Equipment: Equipment, materials and/or supplies purchased with Federal funds are considered solely for the use of that program.

Person Responsible: The Federal Program Director is responsible for maintaining documentation.

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

Disposal of Technology Equipment: Cirrus Academy Charter School - Procedure for Disposition of Technology

- Remove item from use and remove it from active inventory.
- Place item on inactive inventory/disposition form and the technology department will pick up for disposal through a Cirrus Academy Charter School Board of Education approved recycler.

Plans to Support the Unique, Non-Linguistic Needs of Immigrant Students

Cirrus Academy Charter School does not have any Immigrant students; however, below outlines the support that would be provided to students identified as Immigrant students:

- Family literacy, parent outreach, and training activities designed to assist parents to become active participants in the education of their children.
- Support for personnel, including teacher aides who have been specifically trained, or are being trained, to provide services to immigrant children and youth.
- Support for tutorials, mentoring, and academic or career counseling.
- Basic instruction services directly attributable to immigrant students including the costs related to additional classroom supplies, transportation, or additional basic instruction services.

Section 19 Title I, Part C – Education of Migratory Children (MEP) Services

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

The Federal Program Director is responsible for maintaining, updating, and properly coding all required enrollment, educational, and health data in Cirrus Academy Charter School Student Information System on migrant eligible students and shares this information on an intra-district and

interstate basis.

The Federal Program Director monitor the program using these procedures.

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

20. Individual with Disabilities Education Act (IDEA) – Fiscal Indicators

Cirrus Academy Charter School does not receive Comprehensive Coordinating Early Intervening Services (CCEIS)

21. Individual with Disabilities Education Act (IDEA) – Results-Based Monitoring Program Indicators

IDEA Results- Based Monitoring will be conducted in the Portal Special Education Dashboard. Additional information will be shared with the LEA Special Education Director.

22. Individual with Disabilities Education Act (IDEA) – Consolidating in a Schoolwide Program

This applies to the schools where LEAs are consolidating funds in schoolwide programs (Fund 150). Cirrus Academy Charter School does not consolidate funds.