



Brookhaven Innovation Academy

Federal Programs Handbook

Internal Controls & Operating Procedures

2024-25

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Purpose

Brookhaven Innovation Academy (BIA) is a Kindergarten through eighth grade state charter school and is a single school district operating a targeted assistance Title I program. District departments collaborate with the Federal Programs Director to maintain compliance with state and federal regulations and increase overall academic achievement of all students served. BIA maintains applications for federal grants under the Elementary and Secondary Education Act (ESEA) and reauthorized under the Every Student Succeeds Act (ESSA) The processes and procedures utilized to operate these grant programs are detailed in this manual.

The purpose of this handbook is to provide a systematic approach to implementing the regulations of all federal programs to ensure compliance with federal guidelines. The handbook provides helpful information and should serve as a guide for implementing the various components of federal programs. A description of each federal program along with general information regarding program requirements is included in this handbook. Following the guidelines presented in the handbook will ensure consistency, allowability and sustainability. Administrators are encouraged to use the information to ensure that federal programs are being implemented accurately and effectively impacting student achievement.

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Table of Contents

LEA Monitoring Process and Procedures	6
Positions Responsible for Implementation and Monitoring of Procedures	7
Frequency of Monitoring (Timeline)	7
List of Documentation to Verify Monitoring of Title Programs	12
Identification of High Risk Schools	13
IDEA Procedures for Monitoring Schools and Programs	13
Consolidated LEA Improvement Plan	13
Procedures for Creation, Review, and Approval	13
Resolution for Unapproved CLIP	15
Selection of Evidenced-Based Action Steps in the CLIP	15
Schoolwide/Targeted Assistance Improvement Plan	15
Definition of Targeted Assistance Program	15
Title I Targeted Assistance Eligibility Screening	15
Targeted Assistance Checklist	16
Creating, Reviewing, and Approving Targeted Assistance Plans	16
Private Schools	18
Fiduciary Responsibility	18
Maintenance of Effort for ESSA and IDEA	18
Comparability	19
Internal Controls	20
Supplement not Supplant	23
Segregation of Duties (2 CFR 200.303(a))	23
Procurement (2 CFR 200.320)	26
Technical Evaluations of Competitive Proposals and Selecting Recipients (2 CFR 200.320(d)(3))	28
Conflict of Interest (2 CFR 200.318(c))	29
Personal Compensation	30
Payroll	30
Contracted Services	30
Time and Effort	30
Periodic Certification	30

Personnel Activity Report (PAR)	31
Stipends (State Board of Education Rule 160-3-3.04)	31
Travel Policy (CFR 200.474(b))	32
Transportation	34
Lodging	35
Suspension & Debarment (2 CFR 180.220 & CFR 200.213)	37
Equipment Management (2 CFR 200.313(d))	37
Maintenance Procedures to Keep Property in Good Condition	42
Cash Management (2 CFR 200.302(b)(6)) (2 CFR 200.305) &	
Drawdown of Funds (2 CFR 200.305(b)(3))	43
Consultants, Contracts, Purchased Services for Federal Funds	44
Period of Performance Flexibility (2 CFR §200.77, 200.309, 200.403(g); 34 CFR §76.707)	45
Grant Development and Budget Process	45
Supplement Not Supplant	46
Transferability	47
Monitoring and Reporting Program Performance (2 CFR 200.328)	47
Necessary, Reasonable and Allocable Costs (2 CFR 200.403-200.405)	48
Capital Expense Funds (2 CFR 200.439)	49
Ethics and Fraud, Waste, Abuse, and Corruption	49
Complaint Procedures	50
Title I, Part A Improving the Academic Achievement of the Disadvantaged	50
Within District Allocation Procedures	50
Targeted Assistance Programs	51
Required Set Asides Reservation of Funds	51
Parent and Family Engagement	51
McKinney-Vento Homeless Children and Youth Program	51
Neglected and Delinquent Children	52
Private Schools	52
Calculating Parent and Family Engagement Carryover	52
Family Engagement	52
Parent Involvement Policy Overview	53
Technical Assistance to Schools	53

Parent Notifications	53
School/Parent Compacts	55
English Learners Participating in Title I or Title III Supplemental Language Programs	60
Targeted Assistance Program Overview	60
Consolidation of Funds	62
Carryover	63
Title I, School Improvement 1003(g) Grant	63
Services for Neglected and Delinquent Children	70
Foster Care Transportation Plan	70
Title II, Part A - Teacher and Leader Effectiveness	71
Purpose	71
Equity Belief Statement	71
Professional Learning	72
Equity Plan	74
Professional Qualifications of Teachers	75
Parents' Right to Know	76
Title III and English to Speakers of Other Languages (ESOL)	77
Purpose	77
Student Assessment, Identification, and Enrollment Procedures	77
Exit Guidelines	78
Funding	78
Parent Outreach	79
Program Evaluation and Accountability	79
Individuals with Disabilities Education Act	80
Appendix A: Complaint Procedures	81

LEA Monitoring Process and Procedures

Written procedures used to monitor all critical Elementary and Secondary Education Act (ESEA)/Individuals with Disabilities Education Act (IDEA) requirements of all programs (Title I-A; School Improvement 1003(a); School Improvement 1003(g) (SIG); Title I-C; Title I-D; Title II-A; Title III-A; Title IV-A; Title V-B, Title IX-A McKinney-Vento Act; CSP Grant--BIA maintains a separate IDEA implementation manual) and its implementation at the district and schools (where applicable), including procedures that delineate the steps the LEA will use to monitor and provide technical assistance for the implementation of all federal programs. The following procedures have been created and designed to provide reasonable assurance regarding the achievement of objectives in the effectiveness and efficiency of operations.

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

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

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

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

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

Each federal program at Brookhaven Innovation Academy makes use of monitoring as a means of regular observation and recording of activities taking place in the LEA. Critical to this process

is the feedback provided that can assist in improving student academic achievement. District monitoring addresses the following:

- Ensuring that all activities are carried out in accordance with federal compliance guidelines
- Monitoring inventory and equipment usage if purchased with federal funds
- Attainment of academic achievement school improvement goals
- Compliance with budgetary guidelines

Positions Responsible for Implementation and Monitoring of Procedures

The GaDOE requires that BIA monitor the implementation of federal programs and the expenditure of all funds associated with the program.

The specific requirements are as follows:

- Federal Programs Director will conduct self-monitoring of BIA programs sufficient to ensure compliance with Title Program requirements, including Title I-A; School Improvement 1003(a); School Improvement 1003(g) (SIG); Title I-C; Title I-D; Title II-A; Title III-A; Title IV-A; Title V-B, Title IX-A McKinney-Vento Act; CSP Grant; and IDEA.
- Federal Programs Director will undergo training from GaDOE and other sources to maintain proficiency in program compliance requirements.
- Federal Programs Director will provide technical assistance to the school.
- Federal Programs Director self-monitoring will include monitoring all program expenditures to verify that all program expenditures comply with program requirements.
- Federal Programs Director will maintain all documentation LEA may need for future auditing/monitoring according to the LEA Monitoring Form, which is issued annually by GaDOE. In years when LEA does not receive an on-site visit, Federal Programs Director will complete the Self-Assessment Checklist and submit it to the GaDOE.

Frequency of Monitoring (Timeline)

To ensure compliance with federal regulations, BIA has developed a comprehensive list of procedures that are implemented monthly and reviewed annually to provide quality educational services to all students.

- June/September -
 - Provide a technical assistance session for staff following to provide updates on any new guidelines around any federal programs implemented at BIA. Sessions will include the following topics: program(s) information, budgets, funds consolidation, ordering, compliance, parental involvement, professional learning, meeting the needs of students, monitoring, academic achievement, inventory, scheduling, ethics, fraud and waste, and complaint procedures.

- June/July -
 - Complete second periodic certification for 100% federal funded staff for previous year.
 - Federal Programs Director, Superintendent and stakeholders will review the Comprehensive LEA Improvement Process (CLIP) and Federal budgets based on student performance data for the upcoming year.
 - Work with staff on annual revision of compacts; school improvement and parent involvement plans and budgets.
 - Superintendent and Federal Programs Director will review plans and budgets to ensure that funds are being spent according to plans, that plans have all the necessary components, and that plans and the budget align with each federal program.
 - Federal Programs Director will review input & draft documents - Review Annual Survey, and End of Year Title I Review Input from previous school year. Create drafts of Parent and Family Engagement Policy (PFEP) and Compacts. Request to obtain district and school goals as soon as finalized.
 - Professional Qualifications are reviewed prior to the start of the school to ensure proper assignment of teachers.
 - Superintendent reviews annual CCRPI accountability data and completes the sign-off process.
 - Superintendent and Federal Programs Director work with grade levels and departments to develop professional learning plans based on analysis of student performance data, teacher surveys, and observations by administrators.
 - Deadline: July 31st - Comprehensive LEA Improvement Plan (CLIP) submission.
 - Homeless survey submission via the GaDOE portal.
- July/June (On-going) -
 - Meet monthly with the Superintendent and staff; provide additional training as needed.
 - Inventory items, if purchased with federal funds.
 - Federal Programs Director shall monitor all programs. Ongoing review of school improvement data and plans in conjunction with the Superintendent
 - Federal Programs Director conducts quarterly impact checks to ensure improvement plans and budgets are being implemented with fidelity.
 - Federal program coordinators provide technical assistance and meet or e-mail regularly with Accounting/Office Management and Superintendent.
- August -

- o Title I Parent Input Meeting - Send invite to all families with attached link to the Compact document. Meeting agenda: Review drafts and receive parent input.
 - o Distribute home language survey for English Learners, migrant education program form, and student residency questionnaire (McKinney-Vento Act) and other registration documents to parents with initial paperwork
 - o Distribute Parent's Right-to-know within 30 days of the start of the school year
 - o Initial MAP Benchmark Assessments/Student Probes/Universal Screeners will be administered.
 - o Superintendent will review the equity data and effectiveness plan for Title II and provide technical assistance for system planning purposes.
 - o Superintendent will ensure that remediation plans have been developed and implemented for any employees with a non-renewable certificate or in any other case in which a remediation plan is required.
 - o Home Language Survey to identify English Learners (ELs) for service/continuing services.
 - o Begin Title I Inventory Monitoring.
 - o Deadline: 20-day Parent Notification (if applicable). Notifications should occur within 10 business days after the 20-day period.
- September -
 - o Deadline: No later than 30 days after the beginning of the school year, or during the first two weeks of an EL being placed in a language instruction program, notify parents of ELs participating in Title I or Title II funded supplemental EL support services.
 - o Deadline: September 15 – Federal Program Director will work with Business Manager to review budget documents to ensure that all previous year expenditures have been drawn down, with a goal of meeting the 85% expenditure requirement
 - o Deadline: September 15 – List grade spans on the Consolidated Application under the Public School Allocation tab.
 - o Federal Programs Director to create all Title budgets once CLIP has been approved
 - o Obtain copies of daily schedules of Title I teachers, if applicable, and list of Title I personnel.
 - o Federal Programs Director will work with appropriate staff to review the current Title II-A monitoring checklist to assure that processes and monitoring plans are in place in compliance with Title II-A requirements.
 - o Federal Programs Director will attend Title II-A workshops (as scheduled by GaDOE).

- October -
 - Federal Programs Director will distribute Parent and Family Engagement Policy and School-Parent Compacts prior to November 1st .
 - Federal Programs Director will conduct Annual Title I Parent Meeting prior to November 1st - Send invite to all families with attached link to this year's finalized PFEP and Compacts. Link to documents on website.
 - Deadline: October 1 - Federal Programs Director submits budgets via consolidated application and complete Superintendent Prayer Certification.
 - Budgets are reviewed at least quarterly to ensure purchases are in line with each program and are supporting strategies contained in the improvement plans.
 - Deadline: October 1 – General Education Provisions Act (GEPA) 437 form to be attached to the Consolidated Application Attachments Tab
 - Deadline: October 31 – Completions reports for previous year due.
 - Superintendent will work with staff to ensure that remediation plans have been developed and implemented for any employees with a non-renewable certificate or in any other case in which a remediation plan is required.
 - Federal Programs Director and Superintendent will work with appropriate staff to complete the CPI process.
 - All Certified staff to complete Professional Learning Plans or Goals in the TKES/LKES platform within 90 days after the start of school
 - Deadline: October 31 - The Federal Programs Director submits Title I carryover if applicable.
- November -
 - Deadline: November 1 – Title I Parent Meeting held prior to this date
 - Deadline: November 1 – School-Parent Compacts signed prior to this date
 - Superintendent will ensure that remediation plans have been developed and implemented for any employees with a non-renewable certificate or in any other case in which a remediation plan is required.
 - Superintendent will ensure that mid-year remediation conferences are held, and remediation plans are progressing as planned.
 - MAP Benchmark Assessments/Student Probes and/or Classroom Assessments Data Collection
- December -
 - Title I physical equipment inventory
- January -
 - Complete first periodic certification for 100% federal funded staff for current year

- February -
 - Review and update certification requirements of staff.
 - Georgia Compensatory Educational Leaders (GCEL) attendance for Federal Programs personnel
 - Administer ACCESS.
- March/April/May (on-going) –
 - Superintendent verify CPI data
 - Superintendent ensures that remediation plans have been completed prior to giving contracts for next school year.
 - Develop and administer annual needs assessment for ALL federal programs and school improvement planning.
 - Federal Programs Director Meeting to Create Annual Parent Survey - Review previous year survey results and feedback from parents. Get input from School Leaders for additional items. Create Annual Parent Survey
 - Federal Programs Director sends the Annual Survey of Parent and Family Engagement to all families.
 - Federal Programs Director Meeting to Collect Parent Survey Data. The Federal Programs Director will compile and analyze the results of the Annual Survey of Parent and Family Engagement.
 - Superintendent begins the CLIP Process.
 - Compile results of annual needs assessment for school improvement planning.
 - Title I staff members and parents/other stakeholders will review and provide input on the CLIP, targeted assistance plan/school improvement plan
 - Title I Family Engagement End of Year Review & Input Parent Meeting - Send invite to all families. Include link to feedback survey
 - Final MAP Benchmark Assessments/Student Probes and/or Classroom Assessments Data Collection. Results will be compiled and reviewed for the success of programs.
 - Title I staff members will finalize monitoring requirements for the current school year and make necessary changes for the upcoming school year.
 - Compile results of ACCESS and exit qualifying ELs from the program.
 - Conduct annual and on-going comprehensive needs assessment. Data is provided to the Superintendent in order to compile data to determine prioritized needs for the following year.
- July –

- o Superintendent hosts an Annual Strategic Planning meeting with appropriate stakeholders to compile and prioritize data from needs assessment. Feedback from, both stakeholder and Board, will be used to revise Strategic Plan and school improvement plan.

List of Documentation to Verify Monitoring of Title Programs

Federal Program Director will document meetings with school leaders using sign-in sheets, checklists, and agendas. Regular meetings and/or communication will occur to review the required documents and offer technical assistance.

Needed Corrective Actions at LEA Site

If elements in need of corrective actions are found during the monitoring process, the Superintendent and/or the Federal Programs Director will address it. Professional learning is provided based on needs. In addition, professional learning is used as a preventive measure to ensure that all personnel have a clear understanding of the requirements and expectations of the various federal programs. Federal Programs director, along with outside consultants, provide ongoing training as a means of ensuring that the Brookhaven Innovation Academy is in compliance at all times. A reasonable timeline for addressing corrective actions will be agreed upon adhered to by all parties.

Verification of Corrective Actions at Site

Corrective actions, findings, areas of concern, and recommendations received through monitoring feedback are discussed with the Superintendent and the Federal Programs Director. Verification of corrective actions will be determined through ongoing technical assistance provided by the Federal Programs Director and documented appropriately by meeting agendas and sign-ins.

District Review of Applicable Federal Program Budgets

The Federal Programs Director prepares the applicable federal budget. The Superintendent and the Federal Programs Director for Brookhaven Innovation Academy create a budget for federal, local and state funds. Expenditures must align with actions within the CLIP/SIP/TA plan for BIA and each federal program. The Federal Programs Director and Business Manager meet quarterly to review budgets and expenditures. The Business Manager is responsible for completing and submitting the Completion report. Completion reports are annual reports required by the GaDOE for all grant funds. Reports are due thirty days after the end date for each grant. Prior to preparing the completion report, the general ledger report for each grant will be reviewed by the Superintendent and the Federal Programs Director to ensure that all expenditure postings are correctly recorded.

Identification of High Risk Schools

Brookhaven Innovation Academy is a State Charter School. It operates as one LEA and one school. Annual reports from the Accountability Department of the GaDOE will be utilized to determine if BIA is considered high risk as determined by CSI or TSI lists.

IDEA Procedures for Monitoring Schools and Programs

BIA maintains a separate Special Education Policy and Procedures Handbook that covers IDEA.

Procedures for Monitoring

After the annual needs assessment has been conducted, the Strategic Plan has been revised (with stakeholder review and input) and the School-wide plan has been revised, the Superintendent and the Federal Programs Director will ensure the Targeted Assistance Plan and Strategic Plan are aligned to meet the needs of the school and guidelines set forth by Title programs. The Federal Programs Director shall conduct quarterly checks to ensure plans are being implemented with fidelity. The Federal Program Director and the Business Manager meet quarterly to review budgets and expenditures are aligned to each federal program requirements.

Consolidated LEA Improvement Plan

Procedures for Creation, Review, and Approval

The Consolidated LEA Improvement Plan (CLIP) integrates requirements for planning across all *Every Student Succeeds Act* (ESSA) programs and Georgia's Professional Learning Program, and it eliminates the need for LEAs to submit separate plans for these individual programs. The CLIP has five major components: (1) District Comprehensive Needs Assessment; (2) District Improvement Plan; (3) District Parent and Family Engagement Program; (4) Migrant Identification and Recruitment Plan; and (5) Foster Care Transportation Plan.

Brookhaven Innovation Academy, a State Charter School, has a continuous improvement process, which includes a well-established and embedded strategic planning process. A Comprehensive Needs Assessment is conducted in the spring of each school year and the date will be reviewed prior to the beginning of the new school year. The Superintendent, Director of Federal Programs, and other lead school staff review data from all state-mandated assessments to include Georgia Milestones Assessment System, ACCESS for ELLs, Georgia Alternate Assessment (if applicable), Georgia Kindergarten Inventory of Developing Skills, MAP scores. Process, perception and demographic data, including Teacher and Leader Keys Effectiveness Systems reports; annual stakeholder surveys; demographic reports such as Student Record and FTE; and College and Career Ready Performance Index measures, are also part of the

Comprehensive Needs Assessment. The Parent Advisory Committee, which also includes community stakeholders, and BIA administrators review the data/needs assessments and requirements of all federal programs on an annual basis. These needs assessments drive the action/implementation planning for the upcoming year

The CLIP serves as the plan detailing coordination of various federal programs and identification of needs and in-turn budgeting for such needs with federal funds. BIA requires stakeholder engagement in planning for continuous improvement. All faculty and staff are surveyed for input around continuous improvement/strategic planning. All parents are surveyed annually through the Title I annual survey, a needs assessment survey, as well as, the Parent Climate Survey. BIA conducts a comprehensive needs assessment and seeks input from the Board, as outlined in the state charter contract. BIA conducts focus groups with parents of all students to both identify needs and seek possible solutions/actions for improvement. The Administration Team hosts an annual strategic planning meeting where stakeholders work collaboratively to review all data components, prioritize needs and revise the strategic plan and targeted assistance plan to address identified needs around the five areas of continuous improvement.

CLIP revisions take place annually using prior year data and needs assessment information. The CLIP serves as the plan detailing coordination of various federal programs and identification of needs and in- turn budgeting for such needs with federal funds. Director of Federal Programs, Superintendent, as well as community and parent stakeholders are involved in the revision process. Title I parents are sent information inviting them to participate via mail, email, social media, website, and newsletters. BIA conducts an annual survey each year that allows parents to provide input on district policies and procedures. Parent input is examined and considered from these surveys. Documentation includes sign-in sheets, agendas, meeting minutes, emails, and returned plans with comments. Copies of the comments are kept on file and put in meeting minutes. Several subsequent meetings are arranged to garner additional input from stakeholders, if necessary. The Director of Federal Programs will gather all input and update the Consolidated Action Plan. The plan is submitted to the Superintendent for final approval.

Resolution for Unapproved CLIP

If the GaDOE requests revisions to any portion of the on-line CLIP, the Federal Programs Director will retrieve the requested changes from the Audit Trail in the SLDS portal. The Federal Programs Director will ensure that requested changes are completed. This may include additional meetings with stakeholders to review existing data, and/or obtaining additional data as required. The Federal Programs Director will make corrections and/or approve corrections to the appropriate CLIP components and then re-submit the plan. This process is continued until GaDOE has approved the plan.

Selection of Evidenced-Based Action Steps in the CLIP

BIA is required to provide procedures and/or documentation of this best practice. All activities outlined by the online CLIP process for school improvement will be evaluated as

evidence-based interventions and will include supporting documentation from allowable websites or logic models. The Federal Programs Director provides resources on evidence-based information using GaDOE recommendation for planned interventions. If not available, the appropriate BIA personnel will submit logic models for use when establishing the budget. Teachers and other BIA personnel will submit evidence from approved websites, or applicable logic models, when requesting professional development under Title II funding.

Schoolwide/Targeted Assistance Improvement Plan

Definition of Targeted Assistance Program

Schools selected to receive Title I, Part A funds under the Elementary and Secondary Education Act of 1965 (ESEA), Section 1113(c) that is ineligible for a schoolwide program or that choose not to operate such a schoolwide program, may use funds received under a Targeted Assistance Program. Targeted Assistance Program funds are used to provide services to eligible children identified as having the greatest need for special assistance.

Title I Targeted Assistance Eligibility Screening

Eligible children are identified by BIA as failing, or most at-risk of failing, to meet the GaDOE's student academic achievement standards on the basis of multiple, educationally related, objective criteria established by the BIA. Students are screened for eligibility to receive services in ELA and/or Math using a multi-criteria protocol in which points were received based on a rubric (see below). Students scoring 6 points or higher on the rubric were further screened based on whether or not they were already receiving services through Special Education and/or our Early Intervention Program. If so, 5 points were deducted from the initial screening score if students were already receiving Special Education services, and 2 points were deducted from the initial screening score if students were already in our Early Intervention Program. After the secondary screening, any students with rubric scores still at 6 or higher in ELA and/or Math were recommended for Title I services.

Grade	Criteria Used	Point Value
3	Teacher Recommendation	Yes = 1 No = 0
	ELA and Math MAP Percentiles	100 - 90 = 0 89 - 80 = 1 79 - 70 = 2 69 - 60 = 3 59 - 50 = 4 49 - 40 = 5 39 - 30 = 6 Below 30 = 7

5 - 8	ELA and Math Georgia Milestones Scores	3 or 4 = 0 2 = 1 1 = 2
	ELA and Math MAP Percentiles	100 - 90 = 0 89 - 80 = 1 79 - 70 = 2 69 - 60 = 3 59 - 50 = 4 49 - 40 = 5 39 - 30 = 6 Below 30 = 7

Targeted Assistance Checklist

The Targeted Assistance Checklist (Section 1115) serves as a guide to ensure BIA meets the requirements and responsibilities set forth by the state. It also addresses and provides identified students the opportunity to meet the challenging State academic standards.

Creating, Reviewing, and Approving Targeted Assistance Plans

Brookhaven Innovation Academy is both an LEA and a school. The District Improvement Plan and Title Assistance Plan are the same document for BIA. Brookhaven Innovation Academy, a State Charter School, has a continuous improvement process, which includes a well-established and embedded strategic planning process. BIA is a Targeted Assisted School. BIA invites all stakeholders to participate in planning for continuous school improvement. All faculty and staff are surveyed for input around continuous improvement/strategic planning. All parents are surveyed annually through the Title I annual survey as well as the Parent Climate Survey. BIA completes a comprehensive needs assessment and seeks input from the Board, as outlined in the state charter contract. BIA conducts focus groups or input meetings with the director and parents of all students to both identify needs and seek possible solutions/actions for improvement. The Superintendent and Federal Program Director hosts an annual strategic planning meeting where stakeholders work collaboratively to review all data components, prioritize needs and revise both the strategic plan and the Targeted Assistance Plan (TAP) to address identified needs around the five areas of continuous improvement. Once drafted internally, all documents are publicly posted on the website with an opportunity for parents to provide input. TA plans focus on specific goals and needs identified for Title participants.

The plan will include effective methods and instructional strategies to strengthen the academic program through activities such as:

- Professional development for staff who work with participating students
- Expanded learning time

- Implement strategies to increase the involvement of parents of eligible students
- Review progress of **Title I participants**
- Provide an accelerated, high-quality curriculum for **Title I participants**
- Minimize the removal of children from the regular classroom
- Schoolwide behavior plan to prevent and address behavior problems
- Coordinate with and supporting the regular education program
- Annual evaluation and revision

Selection of Evidenced-Based Action Steps

Brookhaven Innovation Academy is required to provide procedures and/or documentation of this best practice. All activities outlined by the CLIP process for school improvement will be evaluated as evidence-based interventions and will include supporting documentation from allowable websites or logic models.

Resolution for Unapproved Targeted Assistance Plan

The TAP is submitted in the GaDOE portal on the Consolidated tab annually. The Federal Programs Specialists at the GaDOE have the opportunity to review the plan for each federal program. If the plan is not approved or revisions are requested, the Federal Programs Director will seek input from the party, revise the plan and re-submit. The process will be followed until the plan is approved and accepted.

Private Schools

Brookhaven Innovation Academy is a State Charter School with no geographic boundaries within Georgia. Private school consultation and participation is not required of State Charter Schools with statewide attendance zones.

Fiduciary Responsibility

BIA maintains Fiscal Policies & Procedures document. The purpose of this document is to provide an overview of internal control policies followed by BIA. The policies cover accounting, financial reporting, information technology and human resource services. Internal controls are the methods and procedures used to provide reasonable assurance to items including:

- Safeguard assets
- Ensure validity of financial reports and records
- Promote adherence to policies, procedures, regulations and laws

- Promote effectiveness and efficiency of operations
- Ensure financial systems are secure and backed up as needed
- Separation of duties

Maintenance of Effort for ESSA and IDEA

GADOE compares the fiscal effort of the preceding year to the second fiscal year and makes the maintenance of effort determination available to the system through a marked “met” or “unmet” on the Consolidated Application. The calculation in the GaDOE portal determines which funds should be excluded from the calculation. Maintenance of Effort (MOE) compliance status is provided by the GaDOE in the portal.

If MOE is met during the current fiscal year, no further action is required by BIA. If MOE is not met during the current fiscal year, BIA will seek to request a waiver. The Federal Programs Director will work directly with the Business Manager to ensure that all procedures regarding maintenance of effort and other fiscal requirements are being met. The Federal Programs Director and Business Manager will maintain required documentation in compliance with the maintenance of effort provisions of Title I and other federally funded programs, including funds to be excluded from MOE calculations.

Comparability

To ensure that funds made available under Title I, Part A, are used to provide services that are in addition to the regular services normally provided by a local educational agency (LEA) for participating children, the LEA must provide services in its Title I schools with state and local funds that are at least comparable to services provided in its non-Title I schools.

The comparability requirement does not apply to a LEA that has only one building for each grade span. BIA is one school and is not required to complete a comparability report because there is only one school in the system. The Federal Program Director annually completes the Comparability of Services utility in the GaDOE portal, indicating that comparability is not applicable.

Assessment Security and Reporting of Accountability

Brookhaven Innovation Academy takes the ethical responsibility to provide secure and appropriate testing environments for its students very seriously. Any state or federally mandated test, BIA expects its employees to act in accordance with specific guidelines mandated by the test and the general guidelines of the GaDOE. BIA follows standard operating procedures for test materials as outlined by the GaDOE. In addition, BIA has procedures in place for monitoring and improving the on-going data quality of its assessment system. Written procedures are in place for the distribution and return of test materials as well as for addressing test security breaches, including violations and consequences.

For every administration of a state or federally mandated test, the following guidelines will be followed.

- The Testing Coordinator will stay current on appropriate testing rules and practice by viewing required DOE webinars and reading all manuals and memorandums associated with the test.
- Testing coordinator will provide training to all test examiners and proctors who will be taking part in the test.
- Records of participation and sign-in sheets of each of these meetings will be maintained in a centralized location for a minimum of five years.
- Trainings at every level will include a segment covering testing ethics and ethical behavior in testing environments.
- Test materials, when on site, will be continuously maintained in a secured and locked room with access limited to only the Testing Coordinator.
- Campus will be quiet and organized on the day(s) of testing.
- Any irregularity or anomalous event-taking place during testing will be promptly and fully reported to the Testing Coordinator.
- Irregularities involving possibly illegal or unethical actions on the part of an employee will be reported to the Georgia Professional Standards Commission.
- If the anomaly rises to the level of an irregularity it will be promptly reported to the GaDOE.
- When test results are returned they will be disseminated to students and parents in a reasonable time frame.

Consequences for Violations Related to Assessment Security

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

District/School State Report Card

BIA posts the Governor's Office of Student Achievement Report Card on its website for public access on the BIA website at: http://www.BIAcharter.org/students_parents and can also be accessed at: <https://schoolgrades.georgia.gov/brookhaven-innovation-academy>

Internal Controls

Code of Federal Regulations

Brookhaven Innovation Academy operates their federal grants in accordance with the Code of Federal Regulations.

Internal Controls Procedures

BIA uses the FISCAL POLICIES & PROCEDURES for internal financial controls as required by 2 Code of Federal Regulations (CFR) Part 200 and allowability under 2 CFR, Part 200.420-200.475. These procedures are set up to strengthen the internal control structure in order to safeguard its assets. The Federal Programs Director monitors the process throughout the grant development, budget, expenditure, and drawdown process. The internal controls include the following:

Allowability of Costs Procedures

When a staff member requests a purchase that may qualify for use of federal funds, the Federal Program Director must use the following criteria when determining whether or not a purchase is **allowable** under Federal grants:

- Be necessary and reasonable for the grant;
- Be approved on a current year budget for the grant;
- Conform to any limitations or exclusions set forth in the grant;
- Aligns with the needs of the SIP/CLIP/TAP;
- Be consistent with policies and procedures for the grant and BIA;
- Cannot be assigned to the grant as a direct cost if any other cost for the same purpose is already allocated as an indirect cost;
- Be in accordance with generally accepted accounting principles;
- Avoids any conflict of interest;
- Adheres to period of performance;
- Be adequately documented for the time period of the grant

When the Federal Program Director cannot determine whether or not the purchase is allowable, they are to contact the GaDOE specialist for assistance.

The Federal Programs Directors work with the Business Manager to review and monitor all expenditure requests to ensure that they are aligned to the goals and objectives outlined in the Comprehensive LEA Improvement Plan (CLIP) and that Title I, Part A and other federal funds are used only to supplement or increase non-federal sources used for the education of participating children and not to supplant funds from non-federal sources. Procedures for

purchasing materials, equipment, and other resources have been established, and proper steps are taken to ensure that BIA follows the supplement, not supplant requirement.

Financial Management ~ Authorization of Expenditures and Prior Approval of Purchases

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

- Each budget is prepared, reviewed and revised by the Superintendent and the Federal Programs Director. Once the budget is submitted and approved by the GaDOE, the office manager logs purchase requisitions into record.
- Requisitions must include:
 - Complete vendor information including phone number (and fax number if applicable)
 - Ship to information including the address for the school
 - Appropriate account number assigned by the system bookkeeper based on the budget sheets
 - Sufficient detail to determine if each cost item is allocable, reasonable, and necessary.
- If the requisition is over \$7,501 two or more written quotes must be obtained and must be reported to the Board of Education by the CFO.
- No purchase or contract shall be divided into parts for the purpose of avoiding the above requirements.
- The requisition is then sent to the appropriate federal program approvers.
- The requisition form is given to the Office Manager to verify funds are available. If funds are available, it is given to the Superintendent for approval.
- The Federal Program Director reviews the requisition, after the Superintendent's approval, to assure that the purchase is included in the SIP/CLIP/TAP and that the expense is allocable, allowable, reasonable, and necessary.
- If approved by Superintendent and Federal Programs Director, the requisition is forwarded to the Business Manager for conversion to a purchase order and ordered.
- If denied, the requisition is returned.
- The CFO issues final approval for purchases over \$7,501.
- When the ordered item arrives, the office manager compares what is received with what was ordered and alerts accounts payable that this order is ready to be paid. Any disputes are reconciled between the office manager or Business Manager and the vendor.

Invoices

The following procedures are followed for invoices:

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

Payment of Invoice:

The following procedures are followed for payment of invoices:

- The Office Manager charges the expenditures to the proper fund/program designated on the purchase order.
- If invoices received that are charged to a federal program exceed the amount of purchase orders, the Office Manager alerts the Business Manager and Federal Programs Director, who work together with the coordinator and determine a solution.
- Disbursement is not made until the invoice is validated as owned by the BIA.
- Open purchase orders are provided by the Office Manager. The Office Manager determines if goods or services have in fact been received but not invoiced by the vendor. The Office Manager is to contact the vendor to secure an invoice if such instances are noted.

**Federal Programs Director must approve all expenditures using Federal funds, including but not limited to Title Programs, CSP, and/or IDEA. Failure to follow the aforementioned procedures could result in the individual placing the order being responsible for payment. Questions should be addressed to the Federal Programs Director.*

Supplement not Supplant

BIA only uses Title I and other federal funds to supplement state and local funds. Title I funds shall not be used to supplant (i.e., take the place of) state or local funds and uses the Resource Allocation and Management Plan (RAMP) method of equitably distributing their state and local instructional resources to address the Title I, Part A Supplement Not Supplant requirement.

The Federal Programs Director works with finance, administration and other required staff to determine the needs of the school and the requirements on personnel and other expenditures to operate the school without the use of federal funds. Because BIA is a one school district, the RAMP details only one school.

Segregation of Duties (2 CFR 200.303(a))

Brookhaven Innovation Academy requires the following segregation of duties associated with cash management to prevent errors and fraud. BIA segregates duties according to GAO-14-704G. No one person at BIA handles all aspects of the financial transactions.

- Requests for purchase are made through a purchase request form.
- The requests are routed to the Federal Programs Director to determine eligibility/allowability of federal funding. It is noted at this point which fund is allowable. If it is not allowable under a federal program, then General Funds are notated.
- Once the request has gone through all approvers, the Business Manager places the purchase order with the company.
- Any receivables are checked in by the front office receptionist and are distributed.
- The Business Manager requests payment through Bill.com once the invoice is received.

Accounting / Business Manager

Under the supervision of the Superintendent, the Accounting/Business Manager will carry out the following duties:

- Prepare monthly and annual financial statements for inspection by the Superintendent.
- Manage cash flow and investment of available funds.
- Assist the Superintendent in preparation of financial data for the state allotments and other financial areas.
- Open all bank accounts and reviews prior to reconciliation. Approves reconciliations of other staff members.
- Oversee the reconciliation of all accounts.
- Compile annual budget for board approval and submit to the GaDOE.
- Coordinate accounting procedures to ensure there are proper procedures in the budgeting, record keeping, and expending of program funds for which they are responsible.
- Oversee, approve and post monthly and year-end adjustments, run and balance reports.
- Oversee and assist with the preparation and submission of year-end and interim financial reports to the GaDOE.
- Process monthly payroll and reporting for all system employees.
- Invoice for any payroll reimbursements.

- Prepare year-end reporting, including W-2's and 1099's.
- Assist with budget preparation.
- Calculate salary adjustments.
- Prepare quarterly tax reporting.
- Compile data for audit; work with state auditors during audit.
- Perform other duties as assigned by the Superintendent.

Federal Programs / Accountability Director

The following responsibilities and/or duties are performed:

- Coordinate, monitor, and provide technical assistance to BIA for all Federal Programs, including but not limited to Title Programs, CSP, and/or IDEA.
- Monitor all purchases to ensure that expenditures are allocable, reasonable, and necessary. Ensuring all system policies for purchasing, expending funds, and inventorying equipment are followed to avoid fraud, waste, abuse, and corruption. No items will be purchased without prior approval, and all items purchased must be a part of the approved budget.
- Approve each purchase requisition/order, travel expense statement and professional learning (PL) leave that is funded through Title Programs. Meet with the Superintendent, Accounting/Business Manager, as needed and request financial reports to ensure alignment and balance on at least a quarterly basis. Meet with and/or email Accounting/Business Manager to ensure accuracy of budgets.
- Coordinate with Office Manager, a physical inventory check.
- Ensure each employee is trained on his/her responsibility regarding fraud and the channels to report it if suspected annually.
- Monitor all purchases to ensure that expenditures are allocable, reasonable, and necessary. Ensure all system policies for purchasing, expending funds, and inventorying equipment are followed to avoid fraud, waste, abuse, and corruption. No items will be purchased without prior approval, and all items purchased must be a part of the approved budget.
- Approve each purchase requisition/order, travel expense statement and professional learning (PL) leave. Meet with the Superintendent and Accounting/Business Manager, as needed and request financial reports to ensure alignment and balance on at least a quarterly basis to Monitor drawdowns to ensure they are based on actual expenditures.
- Assist auditors by providing supporting documentation and/or information on internal processes (including financial documents, professional learning documentation, equipment inventory, and federal programs cross functional monitoring documents).

Federal Programs Coordinator – Title I, Title II, Title III Coordinator, Migrant Education Coordinator (BIA does not currently receive direct funding from Title III or Migrant)

The following responsibilities and/ or duties are performed::

- Ensures compliance with all applicable guidelines.
- Provides technical assistance
- Assists auditors/monitors by providing supporting documentation and/or information on internal processes (including financial documents, professional learning documentation, and all Title I, Title II, Title III, Migrant, Immigrant cross functional monitoring documents).
- Assists in maintenance of equipment inventory and ensures compliance to GaDOE disposal policy.

Homeless Liaison/McKinney-Vento Coordinator - (BIA does not currently receive direct funding from the McKinney-Vento grant)

The following responsibilities and/ or duties are performed:

- Ensures compliance with all applicable guidelines.
- Provides technical assistance
- Assists auditors/monitors by providing supporting documentation and/or information on internal processes (including financial documents, professional learning documentation, and Homeless/McKinney-Vento cross-functional monitoring documents).
- Assists in maintenance of equipment inventory and ensures compliance to GaDOE disposal policy.

Director of Special Education

The following duties related to IDEA and Coordinated Early Intervention Services (CEIS):

- Maintains accurate records and internal controls (e.g. ledgers) ensuring compliance with all applicable regulatory requirements and accuracy of fund balances (object codes).
- Reviews detail and summary reports for potential budget variances and ensures fund balances are accurate.
- Maintains a wide variety of financial records to ensure compliance and the availability of documentation.
- Approves purchase requisitions, travel expense statements, and registration payments for compliance and accuracy.
- Manages Consolidated Application budgets.

- Ensures the special education inventory is accurate.
- Assists auditors by providing supporting documentation and/or information on internal processes (including financial documents, professional learning documentation, equipment inventory, and all IDEA monitoring documents).

Procurement (2 CFR 200.320)

The Superintendent per BIA Governing Board may make a purchase up to \$7,500 without a quote. Services, supplies or equipment estimated to cost greater than \$7,501 will require two written quotes or website references, when possible, to determine best price. Procurement by micro-purchase is the acquisition of supplies or services, the aggregate dollar amount of which does not exceed the micro-purchase threshold (§200.67 Micro-purchase) of \$10,000.00. Micro-purchases may be awarded without soliciting competitive quotations if the non-Federal entity considers the price to be reasonable. Procurement by small purchase procedures. Small purchase procedures (§200.320) are for securing services, supplies, or other property that do not cost more than the simplified acquisition threshold (§200.88) of \$250,000.00. Small purchase procedures are used, price or rate quotations must be obtained from an adequate number (at least 2) of qualified sources. Procurement by sealed bids (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 to all the material terms and conditions of the invitation for bids, is the lowest in price (§200.319). The sealed bid must include details outlined by the state.

Note: The purchase order procedures must be followed for any federal funds to be expended including professional development trainings/conferences.

Per (2 CFR Sec. 200.320), BIA maintains the following guidelines for purchases.

The initiating teacher/staff member must complete a preliminary purchase request form for goods and/or services; it will be forwarded to the appropriate personnel.

- **Gift cards are not an allowable expenditure in any federal program.**
- **Marketing material and give-away items are not allowable in any federal program.**

Micro-purchases (2 CFR §200.67, 48 CFR Subpart 2.1), those less than \$10,000, shall be made with effort to provide the least expense to the BIA. Evidence of the quotes must be attached to the purchase order/requisition sent to the Business Manager. Procurement by competitive proposals (§200.319). The technique of competitive proposals is normally conducted with more than one source submitting an offer, and either a fixed price or cost-reimbursement type contract is awarded. Statewide contracts developed by DOAS adhere to the Code of Federal Regulations (CFR) 200 Procurement Standards for states. When utilizing a statewide contract for a purchase in excess of \$250,000, BIA must ensure all federal requirements are met. Sole source bids may be used only when one or more of the following circumstances apply:

- The item is available only from a single source.

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

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

Each Federal Program Director checks Georgia's System for Award Management (SAM) website, <https://www.sam.gov/SAM/> prior to approving any purchase equal to or in excess of \$25,000 to ensure the vendor is not on the list of suspension and debarment. The resulting check must be printed, signed, dated, and kept with requisition/purchase order documentation.

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

Brookhaven Innovation Academy shall ensure that the process of procuring goods and services is fair and equitable by taking the following measures:

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

Micro-purchases (2 CFR §200.67, 48 CFR Subpart 2.1), those less than \$10,000, shall be made with effort to provide the least expense to the BIA. Evidence of the quotes must be attached to the purchase order/requisition sent to the Business Manager. Procurement by competitive proposals (§200.319). The technique of competitive proposals is normally conducted with more than one source submitting an offer, and either a fixed price or cost-reimbursement type contract is awarded. Statewide contracts developed by DOAS adhere to the Code of Federal Regulations

(CFR) 200 Procurement Standards for states. When utilizing a statewide contract for a purchase in excess of \$250,000, BIA must ensure all federal requirements are met.

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

Contracts binding the school district can be made only by the Governance Team or the Superintendent or approved agent. Failure to follow the aforementioned procedures could result in the individual placing the order being responsible for payment. Report any violations to the Federal Programs Director and/ Superintendent.

Conflict of Interest (2 CFR 200.318(c))

BIA maintains a Code of Business Conduct and Ethics through K-8 which addresses and supports Conflict of Interest as per 2 CFR Sec 200.318(c)(1).

A conflict of interest can occur when an employee's private interest interferes, or appears to interfere, with the interests of BIA or that makes it difficult to perform duties objectively and effectively. Potential areas of conflict can arise from outside employment, improper personal benefit, and financial interest, service on boards or committees, or actions of family members.

Employees of Brookhaven Innovation Academy who are engaged in the selection, award and administration of contracts shall abide by the following:

- No employee, officer, or agent may participate in the selection, award, or administration of a contract supported by a federal award if he or she has a real or apparent conflict of interest.
- 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.
- No employee should accept gifts from a supplier unless the gift is customary and reasonable during the course of ethical business practice, such as a working meal, a printed item, or other small courtesy. The gift should not: exceed \$25.00 in value; be inappropriate or excessive; be frequent; or create the appearance of an attempt to influence a decision.
- Officers, employees, and agents of Brookhaven Innovation Academy may neither solicit nor accept gratuities, favors, or anything of monetary value from contractors or parties to subcontracts.

- Violation of these standards will result in reporting of said personnel to the Superintendent and if appropriate, local authorities. Any misconduct could result in suspension, loss of employment, and any other consequences that are applicable by law.
- Any violation of these procedures must be disclosed in writing, in a timely manner. All violations of federal criminal law involving fraud, bribery, or gratuity violations potentially affecting the federal award must be reported as failure to make disclosures can result in (remedies for noncompliance, including suspension and debarment).

Each new and returning employee is required to complete all mandated training courses, read and sign the employee handbook. The employee handbook outlines the Code of Conduct covering such topics as not disclosing confidential information, conflicts of interest, protecting assets and adhering to antitrust laws.

Personal Compensation

BIA monitors compensation and stipends paid with federal funds per 2 CFR Sec. 200.430.

Payroll

Payroll (1b) is monitored regularly to ensure that only the Title IA and other federal grant paid employees, who are approved in the budget, are being paid with funds from the respective budgets.

Federal program director works with the Business Manager to ensure payroll reports are accurate. In addition, ensures that the number of federally funded employees is consistent with the approved application. Monthly payroll reports, expenditure summary and detail reports, and substitute reports will be used to ensure that each object code is accurate.

Contracted Services

The federal program director ensures that contracts are fulfilled, budgeted correctly, and that services were provided in accordance with the purchased services contract as well as communicated with the Business Services department.

Time and Effort

Charges to a federal fund for salaries and wages must be based on records that accurately reflect the work performed. Any employee who provides supplemental instruction outside of school hours must maintain a timesheet. The federal programs director will ensure that an annual periodic certification or personnel activity report will be maintained for all employees paid with federal funds.

Periodic Certification

Periodic Certifications are required for staff working on single cost objectives. Employees who work on a single federal program or cost objective, the charges for the salary/benefits must be supported by periodic certifications that the employee worked solely on activities appropriate for the grant program or cost objective. A periodic certification must 1) be completed at least annually in compliance with the LEA's internal controls, 2) be completed after the fact, 3) account for total activity (not just that of one fund source), and 4) be signed by the employee, the Superintendent and the Federal Programs Director. A timesheet for the employee must be provided monthly prior to submitting time to the Business Manager.

The Federal Programs Director is responsible for obtaining/completing the Periodic Certification form for the staff paid out of the respective program funds. The Federal Programs Coordinator monitors the Title I teacher/employee roster throughout the fiscal year by following all teacher resignations, terminations, and new hires. The roster is continuously updated as needed.

An annual periodic certification will be maintained for any employee who worked on one federal grant or one cost objective (job). These certifications will be completed after-the-fact. The certification will be completed at the end of June (or on the last contracted day of the school year for employees who do not work year-round). The forms are signed and kept on file in the office of the appropriate federal fund coordinator.

Personnel Activity Report (PAR)

A PAR will be maintained for any employee who works on more than one federal grant and more than one cost objective (job). Split-funded personnel paid with federal funds are required to maintain monthly time logs. Federal Programs Director is responsible for collecting time logs at the end of each month. The logs are shared among the employee, the federal program director and the Superintendent. The Business Manager is responsible for overseeing and monitoring the timeline for reconciliation and adjustment. Adjustments and reconciliation must be completed by the end of the year.

Stipends (State Board of Education Rule 160-3-3.04)

Stipends are defined as compensation "for certain duties and responsibilities outside that of an employee's normal duties, the School may provide a stipend." Stipends may be paid for completing professional learning opportunities that have occurred above and beyond employee's normal duties and outside of regularly scheduled hours. SBOE 160-3-3-.04 Professional Learning defines a stipend as "funds awarded 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." The professional learning must be a part of the strategic plan and/or district improvement plan. The federal program director will maintain the required paperwork to ensure employees are adequately compensated, including agenda, sign-ins and other deliverables. Each employee who receives a stipend collaboratively completes a stipend contract prior to the off-contract or

additional hourly work being completed. The stipend contract is approved by supervising parties and submitted to the Business Manager who ensures proper payment to the employee during a pay period after the event occurs.

The Federal Program Director and Business Manager ensures the stipend amount is charged to the federal program fund indicated on the stipend contract. Stipends must be reasonable and necessary to the federal programs. §200.403(c) - All stipends paid at BIA, whether federally funded or funded otherwise, are paid at the standard rate and follow the same contract procedures for processing payment. §200.404(e) - Keeping the stipend payment uniform ensures that there is no deviation from established practices and policies regarding the incurrence of costs.

BIA provides additional compensation to Grade Level Chairs for the additional work performed as allowed by §200.403(c) SBOE Rule 160-3-3-.04.

Grade Level Chair

- Ensure all standards are covered and paced appropriately
- Create, edit with supplemental and enrichment activities and submit content to lead for approval
- Delegate and manage lesson-planning needs; such as review guides, flipped recordings for students, enrichment, interventions/student support, etc.
- Acts as point of contact for grade level content information and questions
- Attends academic meeting prep as needed
- Collaborate with cross-curricular content chairs to establish planning for assignment and assessment implementation
- Collaborate with vertical content teams to ensure coherence within the content area between grade levels

Leave Policy

Only full-time positions will earn any personal and sick leave. They will earn 3 personal days per year and 12 sick days per year.

Job Descriptions

Job descriptions are developed, maintained, and provided to the GaDOE for approval for all positions paid with federal funds.

Travel Policy (2 CFR 200.474(b))

BIA reimburses travelers for reasonable and necessary expenses incurred in connection with approved travel on its behalf and consistent with 2 CFR Sec 200.474(b) and GSA 48 CFR

31.205-46a. A necessary expense is one for which there exists a clear business purpose and is within the State's expense policy limitations. A clear business purpose contains all information necessary to substantiate the expenditure including current position, the purpose for attending, and an agenda that supports the school improvement plan. Receipts are required with the travel expense report for the following airline fares, hotel expenses, rental cars, meals, rail fares, registration fees, parking, taxi fares, and airport vans. The individual who incurred the expense must submit all expense reports. Under no circumstances should an individual approve his/her own expense report.

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

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

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

- Employees are responsible for ensuring that expenses claimed in the travel expense report are proper, accurate, and incurred for official business. A traveler who knowingly presents a false or fraudulent claim may be subject to penalties under criminal statutes.
- Employee completes and sends a preliminary purchase approval form through the appropriate personal for pre-approval. The Superintendent and designee verifies the information on the form and once deemed accurate. Failure to request reimbursement within 45 days of travel, if applicable, may result in a loss of or reduction of funds.
- Superintendent and Federal Program Director approves the requests. The federal program director must approve any applicable federally funded PL before payment occurs.
- Purpose of the trip must be included on the expense report.
- Attendees are responsible for maintaining and providing upon request information related to registration and dues and fees to include agenda, sessions attended, and proof of attendance.

The Federal Programs Director and the Business Manager thoroughly reviews each transaction, the supporting documentation, and verifies that all transactions are allowable expenses. The Federal Program Director is required to ensure the correct funding sources are charged and in keeping with proper fiscal stewardship. Should expenses not meet approval guidelines, the federal programs director may deny the expense. Denied expenses will be considered a personal expense to the employee. Rarely, a receipt may be lost and the person submitting the expense report must put in writing why they do not have the supporting documentation. The

individual's immediate supervisor or higher administrative authority must approve these statements.

Transportation

Mileage must be documented on a "Travel Expense Statement". From the State Travel Regulations,

"Reimbursement for business use of a personally-owned vehicle is calculated per mile, from point of departure after deduction for normal commuting mileage, based on the current reimbursement rate."

Employees may be reimbursed for the mileage incurred from the point of departure to the travel destination but NOT for their normal commuting mileage. During the normal workweek, the point of departure will be either the employee's residence or BIA; whichever is nearer to the destination point. If leaving from the residence you must deduct the normal commuting mileage to and from the worksite.

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

Air Transportation

BIA will reimburse for lowest (coach ticket or equivalent) airfares if the final destination is over 250 miles and the cost of the ticket is lower than other associated charges such as rental car and gas. Travelers should use penalty or nonrefundable fares whenever feasible. Upgrades may be purchased after the travel is booked, at the traveler's expense, only. BIA will not reimburse fees associated with lost airline tickets and storage, including excess baggage charges, tips and overweight baggage. Air travel is considered "outside of normal guidelines" and will require prior approval by the Business Manager. A quote showing estimated airfare and other associated expenses will be required for approval.

If the travel plan is subsequently canceled, due to the traveler's inability to attend the conference due to emergency situations, the employee is not required to reimburse the district/school. If the employee decides not to attend the conference and the decision is not due to an emergency, the traveler will still have an opportunity to reuse the ticket and they would be expected to reimburse the district for the ticket.

Car Rental

Employees have the option to rent a car when the school-related travel exceeds 150 miles in 1 day or 200 miles in 2 days. Prior written approval will need to be obtained from the Superintendent or Federal Program Director prior to obtaining a rental car. The School cannot

and will not rent a car directly for employees. Before an employee rents a car, it is their responsibility to determine whether their credit card provides auto insurance or whether their primary auto insurance carrier provides rental insurance coverage in the event of an accident. A compact or economy size is usually the least expensive option for a rental car and should be used whenever possible. Employees will expense rental car charges through regular expense reporting procedures. The cost of gasoline is reimbursed for a rental car if the employee selects the self-fill option. BIA will not reimburse for pre-paid gasoline or for any fuel after the car has been returned to the rental agency. The School will not reimburse for miscellaneous charges, such as extra clean-up fees, repairs for damage done to the car, insurance, etc.

Parking

Parking at the airport will be reimbursed, but travelers are urged to use long-term, lower cost parking lots not to exceed \$10.00 per day (Airport Park & Ride). Once at the destination, the traveler is reminded that hotel shuttles may be available free of charge or for a nominal fee. If travelers must take a taxi, consider traveling with a group to reduce the fee. Transportation that is included as part of a conference, workshop, seminar, or similar group meeting will not be reimbursed.

Personal Automobile

No reimbursement will be made for the cost of repairs to vehicles, regardless of whether those costs result from BIA business travel or whether they result from acts of the traveler or another individual. Furthermore, it is the obligation of the owner of a personal vehicle being used for BIA business to carry adequate insurance for their protection and for the protection of their passengers.

When use of a personal vehicle is necessary, School employees will be reimbursed at the current federal guidelines per mile for travel required for BIA business. The mileage reimbursement rate includes gas charges; gas is NOT reimbursable for personal vehicles. BIA will not reimburse mileage for trips to the post office, to purchase office supplies or to restaurants.

Lodging

Lodging will be reimbursed or provided when an overnight stay away is required for a mandatory school event, such as training, conferences or state meetings. Outings are not considered mandatory and will require prior approval from the Superintendent for overnight stays. Lodging request-requiring BIA to complete the registration and pay for the room must be submitted by the following deadlines or lodging becomes the responsibility of the employee.

The traveler should be prepared to handle their own arrangements using their personal credit card and submit expenses except when the BIA has negotiated group rates or special arrangements for lodging such as during professional development.

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

- Lodging must be documented on a "Travel Expense Statement".
- Employees are responsible for making their own reservations and guaranteeing them.
- Employees should use the least expensive rates for lodging. Any rate above this requires written authorization prior to the trip.
- Expenses must be broken down by date. Receipts are required.
- Any out-of-state travel must first receive the Superintendent's approval.
- For one-day events, an overnight stay is authorized if the employee lives 50+ miles (one way) from the event location. For events lasting one or more is authorized if the employee lives 50+ miles (one way) from the event location.
- Employees are responsible for submitting a copy of the tax exemption form for state and local hotel/motel excise taxes if staying at a hotel in Georgia. Any tax paid, must have an explanation of why it was not waived, for example, paid with personal credit card, state does not allow or \$5 State Hotel Motel Fee, no exemption allowed.

All hotel requests must have prior approval from the Superintendent or Federal Programs Director. Whether lodging arrangements are made by the School or by the employee, it is the responsibility of the employee to physically go to the hotel desk to retain an itemized hotel bill for settlement of their travel expenses and review for accuracy. The School will not reimburse for miscellaneous charges on a hotel bill, such as laundry service, movie rentals, Internet, etc.

Sustenance

The School will reimburse travelers for their meals if they are on a school business trip. While the cost of meals varies widely, the School will reimburse up to a maximum of \$27.00 for meals per day, including normal or customary tips (15-20% max). Meals that are included, as part of a conference, workshop, seminar, or similar group meeting will not be reimbursed. The school will also reimburse meals for trips that require 50 miles or more travel in one day and are part of a mandatory function, such as teacher training or testing, lasting more than 8 hours. Alcoholic beverages are not allowed and will NOT be reimbursed. PD Exception - If lunch is not provided as part of PD, employees who do not meet the above mileage and lodging criteria can be reimbursed up to \$10 for lunch with a detailed receipt.

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

- Full-itemized receipts are required on all meal reimbursements. Credit card receipts are not sufficient.

- Only actual costs of meals are reimbursed; therefore, if the total spent for a day is less than \$27.00, only the lower (actual cost), will be reimbursed.
- Meal reimbursement for out of state overnight travel are generally eligible for per diem amounts designed to cover the cost of three (3) meals per day for all days on travel status other than the day of departure and the day of return.
- Expenses must be broken down on the expense report per meal.
- Taxes and tips are allowed and should be included in the total. However, this total should not exceed the per meal rate.

Suspension & Debarment (2 CFR 180.220 & CFR 200.213)

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

Equipment Management (2 CFR 200.313(d))

The Every Student Succeeds Act (ESSA) provides several fiscal requirements that are applicable to federal funds. An inventory of tangible personal property having a useful life of more than one year will be maintained at the system and/or school level. This includes all items purchased under state object codes 615 (expendable equipment) and 616 (expendable computer equipment).

Acquisition of Equipment

Brookhaven Innovation Academy maintains records to document the procurement and location of equipment and real property purchased with federal funds. Property inventories are conducted and maintained for equipment and real property. Procedures for purchasing have been established to ensure that all purchases comply with local, state, and federal requirements and are in alignment with student learning needs. Equipment is defined as any item with a shelf life of more than one year.

Federal program purchases are based on student learning needs as outlined in the Comprehensive LEA Improvement Plan (CLIP). The Federal Programs Director works with the Superintendent to review student achievement data and goals and objectives outlined in the school improvement plan to determine the purchase of equipment and its use.

Any equipment purchased with Title I and other federal funds must be reasonable and necessary; all equipment must be accounted for at all times and used for the purpose for which

it was intended. All school and system staff involved in Title I and other federal programs will follow internal control procedures for approval and receiving of equipment (see System Purchase Order Processing Procedures). Once equipment is received, the office manager will label the equipment with the appropriate information, include it on the inventory, and issue the equipment to the proper location.

Method for Entering Information on Inventory Management Log

The inventory records will include a description of the item, serial/identification number, funding source and percentage of source, vendor, acquisition date, unit cost, location and use, condition, title, and disposition (based on EDGAR 80.32 guidance). BIA maintains the following data:

• Location	• Supplier
• Equipment holder	• Purchase Order
• Item Description	• Purchase Date
• Make/Model	• Date Added to Inventory (new)
• Serial Number	• Budget Year
• Inventory Tag Number	• Value
• Initials of Verification	• Use (Instructional, Administrative, PD)
• Funding Source	• Condition
• FAIN number (if applicable)	• Disposition Date
• Operating System (if applicable)	• Disposition Value

The business clerk will monitor the physical inventory to ensure adequate safeguards related to loss, damage, or theft are in place. Requests for repair will be documented in the inventory record.

Requisition of Equipment

All purchases with Federal Programs (Title I-A, Title I-C, Title II-A, Title III-LEP, Title III – Immigrant, Title IV-A, Title IV-B, Title VI-B, Title X-C, IDEA, CSP) funds will be made only after prior approval by the Federal Programs Director and Superintendent. Purchases must be allowable, supplemental, consistent with academic assessment needs, and costs deemed as reasonable and necessary for operating federal programs. Federal funds are not to be used for general expenses required to carry out other responsibilities of a state or its sub recipients. Regardless of cost, items will be included on the inventory if they have a shelf life of more than one year. Books and consumable items are not included on the inventory.

Entry of Information into Inventory and Management System

Federal Programs inventory is entered directly into a secure spreadsheet. Inventory purchased after 2016 must have a Federal Award Identification Number (FAIN). The Federal Programs inventory list must be accessible to administration. The office manager is responsible for verifying receipt of equipment and entering items on the Federal Programs inventory spreadsheet promptly upon receipt. The office manager enters the item description, cost, source of funding including the FAIN number, date of purchase, vendor, serial number or other identification number, location, use, condition of property and disposition data including the date of disposal of each Federal Programs inventory item into the inventory database. The condition of equipment is evaluated and recorded each year as part of the annual inventory audit. Once entered into the spreadsheet, office manager tags and labels each item with appropriate tag information.

Off-Site Use of Equipment

There is no off-site use of equipment purchased with federal funds at Brookhaven Innovation Academy.

Physical Inventory

Inventory of all equipment and property belonging to any federal program will be identified and inventoried on an annual basis. December of each year is designated as the site-wide inventory count month. The Information Technology (IT) Technician and Office Manager for BIA physically verifies the inventory; both the IT Technician and Office Manager sign and date to verify the inventory data is the most current and accurate record of technology inventory including Federal Programs inventory items. Federal programs inventory will be randomly spot-checked by the Federal Programs Director on an annual basis each spring. Materials purchased for use in federal programs are labeled and are to be utilized in the capacity for which they were purchased. Any equipment, materials and/or supplies purchased with federal funds are considered solely for the use of that program. With the help of the Information Technology (IT)

Technician and Office Manager, the Federal Programs Director must ensure that Federal programs inventory remains in use in an allowable capacity. When rooms are reassigned or equipment reassigned, items inventoried to federal programs must remain with the program in an allowable capacity. This may mean moving mounted equipment, computers, projectors, or other equipment at the time of room reassignment. During the annual physical inventory each year, the Federal Programs Director will determine if the item is assigned to an allowable person and being used in an allowable way. Any discrepancies with personnel assignment or allowable use will be immediately re-assigned and rectified.

Equipment Disposition: No Longer Needed for Original Intent, Loss, Damage or Theft

Disposition

Inventory records are maintained until equipment is disposed of or transferred to another Title I school, federal program, or local program. Records for real property and equipment acquired with federal funds are retained for three years after transfer or final disposition.

Disposition/transfer can occur at the close of the federal program/school, if equipment is no longer needed for original intent and transferred to another program, or in the event the equipment is no longer usable.

Procedures for disposing of equipment and real property are in compliance with local, state, and federal policies. When original or replacement equipment acquired with federal funds is no longer needed for the original project or program, the equipment may be retained, sold or disposed of, if it is not needed in any other Title I, Part A or other federally funded project or program.

The Superintendent will be responsible for following procedures listed below when eliminating any equipment item from the inventory:

- Equipment items with an acquisition cost/current per unit fair market value of less than \$5,000.00 and are more than three years old may be retained, sold or disposed of, with no further obligation to the GaDOE. The disposition of such items should be noted on the equipment inventory maintained by BIA.
- Equipment items with an acquisition cost of \$5,000.00 or more may be retained or sold and the awarding agency (GaDOE) shall have a right to amount calculated by multiplying the current market value or proceeds from sale by the awarding agencies (GaDOE) share of the equipment.
- If the current per unit fair market value is \$5,000.00 or more, the equipment may be retained or sold and the awarding agency (GaDOE) shall have a right to an amount calculated by multiplying the current market value or proceeds from the sale by the State's share of the equipment. The entity is permitted to deduct and retain from the State's share \$500 or 10% of the sales proceeds, whichever is less, for the entity's selling and handling expenses.

- Forward a check made payable to the GaDOE in the amount of the State's share. The amount is then returned to the State's Title I LEA allocations fund.
- The disposition of such items should be noted on the equipment inventory maintained by the recipient. The recipient should include the date of disposal and sales price or the method used to determine current fair market value if the recipient compensates the State.

Adequate Safeguards

Equipment that is damaged, lost, or stolen will be reported to the Federal Programs Director. A "Report of Lost, Stolen, or Damaged Technology Equipment" form will be completed by the office manager and signed by the Federal Programs Director. A police report may be required for stolen property. A copy of the "Report of Lost, Stolen or Damaged Technology Equipment" and/or police report will be forwarded to the Federal Programs Director. Replacement of lost, stolen, or damaged equipment will be handled on a case-by-case basis with the ultimate decision resting with the Superintendent. Depending on the situation, individuals may be asked to provide a comparable replacement device or pay a monetary amount comparable to the actual cash value of the device. Equipment is stored in locked cabinets in teachers' classrooms or the inventory room.

Safeguards for Unauthorized Use or Disposition

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

Equipment Use for Title I, Part A Targeted Assistance Programs

The Brookhaven Innovation Academy operates as a Title I, Part A targeted assistance program. BIA ensures that Title I students use equipment a vast majority of time without the interference of non-Title I students. Title I students use equipment purchased with Title I funds 90% of the time. Equipment is assigned to staff or students participating in the Title I program when available by the Office Manager. The office manager collects equipment at the end of each school year. BIA does not purchase equipment for Title I parents.

Equipment use for private schools

Brookhaven Innovation Academy is a State Charter School with no geographical boundaries within the State of Georgia. BIA does not serve private schools.

Capital Outlay for Purchases

All equipment purchases using Title I funds will be made only if in compliance with federal and state guidelines. Equipment may be purchased using Title I funds if it can be determined that the equipment is reasonable and necessary to effectively operate its Title I Targeted Assistance School Program, existing equipment will not be sufficient, and the costs are reasonable.

The Federal Programs Director will work with the Superintendent and appropriate teachers and other stakeholders to complete a needs assessment process prior to submitting a purchase order for equipment to be paid for with Title I funds. The needs assessment will be based on disaggregation of student achievement data. The CLIP will serve as the foundation for the needs assessment process (e.g. reviewing data to determine areas of strengths and weaknesses within each program, determining resources needed to adequately meet the needs of all students).

Purchase order procedures must be followed to ensure approval has been made at appropriate levels. Brookhaven Innovation Academy does not make capital purchases (1d-f) (object code 700/items costing \$5000 or more) using Title 1 funds. We made this decision due to the impact it would have on our budgets. Should we decide in the future to purchase these items, we would obtain approval from the GaDOE prior to budgeting these items.

Maintenance Procedures to Keep Property in Good Condition

Federal program coordinators will work cooperatively with the IT Specialist and Office Manager to ensure that equipment is properly maintained to ensure longevity. Accurate records will be maintained about the current condition of equipment purchased with federal funds. Equipment inventory procedures will be disseminated by the Federal Programs Director as new equipment arrives to BIA.

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

The Business Manager works with the Federal Program Director to ensure that all procedures regarding cash management and other fiscal requirements are being met. All purchases have to be approved by the Federal Programs Director and the Superintendent before an order is placed or an item is purchased. No one is allowed to purchase an item and then request reimbursement with federal funds without proper purchase approval from the Federal Programs Director.

Teachers are reimbursed for travel expenses for approved professional learning activities. The staff member who attends the event fills out the expense report, once reimbursement has been approved it will then be processed through the payroll system.

The Federal Programs Director meets with the Business Manager on a quarterly basis to review purchases and to determine the amount that has been expended by the district in order to determine the amount of drawdown to request.

The Business Manager maintains all records and files consistent with the GaDOE's DE1047 report.

Sub-Recipients Procedures (Draw-Downs)

The Federal Programs Director meets with the Business Manager on a regular basis to monitor the federal program funds. The Business Manager logs into the financial system to review cumulative to date expenditures as compared to cumulative drawdowns.

They review all the expenditures: salaries, contracts, purchase orders, travel etc.; to ensure that the funds we are requesting as drawdown have in-fact occurred. If there is a discrepancy, they work together to reconcile the difference before the draw-down occurs.

No draw-downs are requested unless there is documentation that the items were received, or the services rendered for the federal program that is requesting the funds.

Funds are drawn down based on actual program expenditures. It is the responsibility of the appropriate Business Manager and the Federal Programs Director to work cooperatively to review all expenditures on a monthly basis after budget approval before funds are drawn down from Grants Accounting Online Reporting System (GAORS). Moreover, the following practices are observed:

- Coordinators for each federal program must reconcile their respective budgets monthly to ensure that all expenditures charged to their program are allowable.
- Superintendent and Federal Programs Director will perform periodic reviews of the general ledger, including federal accounts and fund sources.

- The Business Manager runs a monthly report out of the financial software to draw down funds. Each federal program director or their designee will sign a printed copy, verifying the accuracy of the report.
- Funds are drawn down monthly based on actual expenditures and on a reimbursement basis only.
- The Superintendent reviews, signs and dates the report.
- The Business Manager logs into the appropriate agency.
- When the drawdown is received into the district's bank account, the Business Manager will create a journal entry in the accounting software. The Superintendent will review, approve and post the journal entry to the general ledger.
- The Business Manager reconciles all bank statements and performs periodic review of the general ledger.
- There is no cash involved as all drawdowns are directly deposited into the system's bank account.
- Federal program director ensures that equipment/supplies are purchased and received during the period of performance of the grant award.
- BIA does not request advance payments for federal fund disbursements, only reimbursements.
- All reporting documentation is kept in the Business Office and is available for review upon request.

At the end of the year, reconciliation for GAORS grants, a report is printed from the accounting software along with the Consolidated Application, and the Federal Program Director reviews and signs off that the completion report may be entered. After data is entered, the reports are given to the Superintendent for review and approval. The Business Manager will then submit to GaDOE. The original is kept on file in the main office and a copy is made for the Federal Program Director's file for monitoring.

Consultants, Contracts, Purchased Services for Federal Funds

Contracts are required for all consultants and purchased services. Agreements are entered into between Brookhaven Innovation Academy and the consultant. Each contract contains the following:

- Contracts are generated by the Business Manager under the direction of the Superintendent.
- Specific duties are specifically spelled out for each contract.
- The person must also submit to be fingerprinted if they are working with students.

- If the contract is with a TRS retiree the individual must be reported and approved by TRS prior to beginning services.
- The contract includes the number of hours to work and the rate of pay.
- Superintendent must submit tutoring time logs based on the payroll deadlines.

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

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

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

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

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

Grant Development and Budget Process

The federal program director prepares a yearly budget showing the distributions per program/function/object code. Federal Program Director ensures that all funds budgeted are allowable per funding source. The budget is forwarded to Business Manager after the GaDOE approves the budgets in the Consolidated Application. The Business Manager or the federal programs manager enters the budget into the system financial software using the Consolidated Application budget as the source.

Supplement Not Supplant

BIA only uses Title I and other federal funds to supplement state and local funds. In no case may Title I funds be used to supplant (i.e., take the place of) state or local funds and uses the RAM/P method of equitably distributing their state and local instructional resources to address the Title I, Part A Supplement Not Supplant requirement.

The Federal Programs Director works with Superintendent, finance, administration and other required staff to determine the needs of the school and the requirements on personnel and other expenditures to operate the school without the use of federal funds. Because BIA is a one school district, the RAM/P details only one school.

The following guidelines will be used for Title I Targeted Assistance Programs:

- Equitable distribution of non-Federal funds requires that a Title Assistance program shall use Title I funds only to supplement the amount of funds that would, in the absence of the Title I funds, be available from non-Federal sources for the school, including funds needed to provide services that are required by law for students with disabilities and English Learners.
- Supplemental activities are determined by Brookhaven Innovation Academy such that non-federal funds are distributed to all schools across the district in equitable ways. Furthermore, per pupil allocation by grade band will be used to equitably distribute Title I funds.
- To demonstrate compliance with supplement not supplant, the school system updates and submits to the GaDOE yearly a Resource Allocation and Management Plan (RAMP) that ensures that each Title I school receives all of the state and local funds it would otherwise receive if it were not receiving Title I funds.

The following three-prong test will be used for Title II and Title III in determining whether a fiscal expenditure supplements and not supplants. A positive response to any of the three prongs indicates that an expenditure would be supplanting.

- Test I - Required – is the program or activity that the district wants to fund required under state, local or another federal law?
- Test II - Equivalency – Were state and local funds used in the past to pay for this program or activity?
- Test III - Non-Title I Programs- Are the same programs or activities being implemented in other schools that do not receive Title I funds AND are these programs and activities being paid for with state or local funds?

Transferability

LEAs are provided the opportunity to transfer funds under the Every Student Succeeds Act. BIA does not participate in the transfer of funds under ESSA and/ or the consolidation of funds.

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

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

Copies of completion reports for the previous fiscal year will be kept on file in the business office. Accounting records to support the results of outlays (expenditures indicated in the completion report will be kept on file). Copies of expenditure (cumulative through) reports for the respective quarter for total expenditures reported to GaDOE will be kept on file in the business office. Federal Program Director will examine budget summary and detailed expenditure reports for their respective budgets. The Superintendent is required to analyze budget summary reports at least quarterly.

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

General ledger reports will be generated for each grant by function and object codes. The Business Manager completes these steps in the system financial software:

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

Monitoring and Reporting Program Performance (2 CFR 200.328)

Brookhaven Innovation Academy undergoes regular monitoring and audit visits as scheduled by the State of Georgia. Corrective action plans are created to reconcile any findings received. BIA will maintain the appropriate documentation to indicate that corrective actions have been completed and any findings have been cleared.

Steps to Audit/ Monitoring Resolutions:

- Once the audit/ Cross-Functional Monitoring report is received, the appropriate federal program coordinator will review all items. The Cross-Functional Monitoring report will be retrieved from the GaDOE website under the Consolidated Application.
- Each item will be examined carefully, and the Federal Programs Director will determine the best means of corrective action.
- Items are gathered, and a report is written by the federal program director.
- The report is submitted to the Superintendent.
- The completed report is then sent to the GaDOE state auditors as a means of resolution.
- The district has 30 days from the receipt of the findings to respond to the GaDOE.

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

The following internal controls have been created and designed to provide reasonable assurance regarding the achievement of objectives in the compliance with applicable laws and regulations.

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

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

Capital Expense Funds (2 CFR 200.439)

Brookhaven Innovation Academy does not use federal funds to budget items under object code 700 (capital expense).

Ethics and Fraud, Waste, Abuse, and Corruption

Purpose

To ensure the reporting of suspicion of fraudulent activity the Brookhaven Innovation Academy ensures employees, clients and providers of confidential channels to report suspicious activities.

Definitions

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

Statement of Administrative Regulations

Prior to employment, all BIA staff complete Compliance modules that include ethics training. The Brookhaven Innovation Academy thoroughly and expeditiously investigates any reported cases of suspected fraud to determine if disciplinary, financial recovery and/or criminal action should be taken.

Confidentiality

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

Procedures and Responsibilities

- Anyone suspecting fraud concerning federal programs should report their concerns to the Brookhaven Innovation Academy at 3159 Campus Drive, Norcross, GA 30071. Phone: (770) 538-1550 ext. 1541.
- Any employee with the Brookhaven Innovation Academy (temporary staff, full-time staff and contractors) who receives a report of suspected fraudulent activity must report this information within the next business day. Contact Dr. Kia James at (770) 538-1550 ext.

1541. Employees have the responsibility to report suspected fraud. All reports can be made in confidence.

- The Brookhaven Innovation Academy shall conduct investigations of employees, providers, contractors, or vendors.
- If necessary, BIA will be contacted for additional information.
- Periodic communication through meetings should emphasize the responsibilities and channels to report suspected fraud.

Complaint Procedures

Any complaints issued as a result of any federal program, must be filed according to BIA federal programs complaint procedures policy. BIA will use the Tracking Form for Resolution of Complaints (Appendix B) to ensure that complaints are resolved in a timely manner. This form is maintained by the Federal Programs Director and at the reception desk at the central office (see Appendix A: Complaint Procedures).

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

Within District Allocation Procedures

Since BIA is both a district and a school, once the required set-asides are determined the remainder of the district allocation is given to the one school in the district. Title I funds are allocated to provide additional resources to support identified TA students and parents.

LEAs are permitted to carryover federal funds not expended within the fiscal year awarded to the next fiscal year. The law specifies requirements for the expenditure of carryover funds exceeding the 15 percent carryover limitation. However, the waiver process allows LEAs to request waivers from the GaDOE once every three years when the LEA can expend at least 85% of the allocated Title I funds within the fiscal year. The BIA set aside for the homeless is based on the previous year's expenditure. BIA calculates the total amount based on previous year's expenditures, and then calculates the maximum percent allowable in each fund.

The Federal Programs Director works with the Business Manager to review all documentation relative to federal allocations and procedures for carryover. BIA complies with all requirements with regard to reserving funds for either required or allowed set-asides and procedures for carryover funds.

Targeted Assistance Programs

Brookhaven Innovation Academy operates as a Targeted Assistance Program School. BIA uses Title I funds only for programs that provide services to eligible children identified as having the greatest need for special assistance.

Required Set Asides Reservation of Funds

After receiving notification of the Title I, Part A grant amounts from GaDOE, reservations in each budget are set aside for required components such as parent involvement, professional learning, neglected and delinquent, private school per pupil and equitable services, and homeless students. Administrative costs are also part of the reservations, which are not part of the schools' per pupil amounts. The only set aside BIA is required to reserve is for homeless funds. The remaining Title I funds are allocated to schools based on per pupil allocation, as determined by the percentage of students qualifying for free and reduced price meals.

Parent and Family Engagement

Required 1% Set Aside for Parental Involvement: BIA does not currently receive a Title I allocation greater than \$500,000 and therefore is not required to set-aside an allocation for parent and family engagement. If the allocation is greater than \$500,000 in the future, Title I parents will be informed about the 1% set aside during the Fall Annual Meeting and participate in the discussion regarding this requirement each Spring during Title I planning meetings. If the total 1% is not expended, the difference must be carried over to the following fiscal year.

McKinney-Vento Homeless Children and Youth Program

Brookhaven Innovation Academy does not receive direct funding from the McKinney-Vento Homeless Program. The system Homeless Liaison trains school personnel to identify children in homeless situations. A home survey is also used to identify homeless students. The system Homeless Liaison is consulted if any staff member suspects that a student qualifies for homeless services. The Homeless Liaison then investigates the situation and makes the ultimate determination on whether or not students qualify. When a student does qualify, the appropriate information is entered into the Student Information System. Title I, Part A funds are reserved to benefit the education of homeless students. Funds are allocated based on an annual analysis of student needs.

Neglected and Delinquent Children

Brookhaven Innovation Academy is a State Charter School with no geographic boundaries within Georgia. Neglected and Delinquent Children and services are not applicable to BIA.

Private Schools

Brookhaven Innovation Academy is a State Charter School with no geographic boundaries within Georgia. Private schools and equitable services are not applicable to BIA.

Calculating Parent and Family Engagement Carryover

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

Family Engagement

The purpose of parent and family engagement is to promote active involvement among local educational agencies (LEAs), administrators, school staff, parents, Family Engagement Coordinators, community leaders, and other stakeholders working to improve student achievement and promote academic success. Parent and Family Engagement is an ongoing process that increases active participation, communication, and collaboration between parents, schools, and communities with the goal of educating the whole child to ensure student achievement and success. BIA has strategies in place to: Build capacity to involve parents/stakeholders in an effective partnership with the school and to share and support high student academic achievement.

Parent Involvement Policy Overview

Brookhaven Innovation Academy has an ongoing commitment to Title I parents. Parental involvement is defined as the participation of parents in regular, two-way, and meaningful communication involving student academic learning and other school activities. Our goal is to ensure that Title I parents and their children receive extraordinary services and assistance that will lead to improved academic achievement. BIA 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. BIA is committed to assisting parents of all socioeconomic levels in solidifying their ongoing commitment to their child's success.

Technical Assistance to Schools

BIA will have a member of the Family Engagement Team serve as Title I Family Engagement Compliance Monitor. The Title I Family Engagement Compliance Monitor will use the Cross-Functional Monitoring Document along with GaDOE Comprehensive Guide, Checklists,

and Trainings to align the Family Engagement documents and programming to Federal and State requirements including School Parent and Family Engagement Policy, School-Parent Compacts, all Title I, Part A, Section 1116 requirements, and the notice to parents of participating English Learners in supplement language instruction programs. . The Title I Family Engagement Compliance Monitor will collaborate regularly with the Federal Programs Director to coordinate required items. The Title I Family Engagement Compliance Monitor will also collaborate regularly with the Family Engagement Team to ensure BIA Family Engagement documents and programming meet or exceed Federal and State requirements.

BIA shall provide technical assistance in the following ways:

- Professional learning sessions during administrative and curriculum meetings and regional staff meetings.
- One-on-one meetings held at school between the Title I Director and stakeholders as needed
- The creation and sharing of a Federal Programs Handbook.
- Maintaining a Parent and Family Engagement Policy.
- Technical assistance with planning, organizing, and conducting parent meetings.
- Maintain an updated website, email communication, and timely responses to emails and phone calls.

Parent Notifications

Communication in an Understandable Format

Upon enrolling their child(ren) in Brookhaven Innovation Academy, every parent indicates their household's preferred communication language as a standard part of the registration process.

BIA will use the GaDOE's Parent and Family Engagement Distribution Checklist to document the distribution of the Parent and Family Engagement Policy and the School-Parent Compacts to parents and the local community in a timely manner and to the extent practicable; in a language and format parents can understand.

- The convening of an Annual Title I Meeting for BIA in which BIA will distribute the Parent and Family Engagement Policy and the School-Parent Compacts.
- The Parent and Family Engagement Policy and School-Parent Compacts will be distributed by email.
- The Parent and Family Engagement Policy and School-Parent Compacts will be placed on the website.

Reasonable efforts are made to provide either written support or support through an interpreter when a parent indicates a language other than English. The Federal Programs Director will work to ensure translation of BIA parent meeting documents (i.e. Parent and Family Engagement Policy, School-Parent Compacts). The Title I Family Engagement Coordinator will ensure the

placement of translated documents is available on the website. The Title I Family Engagement Coordinator will use the GaDOE's Comprehensive Guide and Distribution Compact Checklist to document distribution that will be signed by the Federal Programs Director.

School Designation Status

If BIA is identified as needing Comprehensive or Targeted Support Interventions by GaDOE. Parents will be notified of the designation status using multiple means of communication.

Parent Right to Know

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

20 Day Notification of Professional Qualifications

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

Regular Education Teachers

Notification must be sent when students have been taught for four or more consecutive weeks by a teacher who does not meet the district's PQ requirements at the grade level and subject area in which the teacher has been assigned.

Special Education Teachers

Special Education teachers who do **not** issue grades: 20-day notifications must be disseminated if the teacher does not hold special education certification. Special Education teachers who **do**

issue grades: 20-day notifications must be disseminated if the teacher does not hold special education certification and content certification or equivalent as aligned with ESSA in-field.

Notifications are not required for paraprofessionals, substitutes, or lack of a clearance certificate. Upon placement, the Federal Programs Director shall indicate if there is a need to send a 20-day notification to parents and review the requirements. Prior to the 20-day mark, a draft letter will be agreed upon and the letter translated, if necessary. Within ten business days following the four consecutive weeks, the notification will be sent to parents. Evidence of dissemination will be kept on file with the Federal Programs Director.

Parental and Family Engagement Policies/Plans

Brookhaven Innovation Academy is committed to cultivating and sustaining partnerships with parents and community stakeholders, and encourages their participation in the development, implementation, review and evaluation of its parental involvement policy/plan. This written policy/plan focuses on improving academic achievement and school performance and outlines how the BIA will coordinate, provide technical assistance and other support in planning and implementing effective parental involvement activities, trainings, and workshops.

Brookhaven Innovation Academy, parents, and community stakeholders will jointly develop and agree on the Parental Involvement Policy/Plan which will describe the means for carrying out Title I, Part A requirements. The policy/plan will be made available to the local community and parents of students enrolled in Brookhaven Innovation Academy using multiple means. The policy/plan will be available on the Federal Programs page of the district's website (www.BIASchool.org) and in hard copy format in the main office.

School/Parent Compacts

Brookhaven Innovation Academy will share responsibilities for high student academic achievement with all parents and students enrolled in the school system and will develop, in collaboration with parents and students, a school-parent compact that outlines how parents, school staff, and students will share the responsibility for improved student academic achievement. The school-parent-student compact will also describe the means by which the school, parents, and students will build and develop a partnership to ensure student mastery of the GaDOE's high academic content standards.

A School-Parent Compact is an agreement that parents, students, and teachers develop together. It explains how parents and teachers will work together to make sure all students reach grade-level academic standards.

This compact will:

- Link to goals of the school improvement plan
- Describe how the school will provide resources for specific at home learning activities to promote student academic growth

- Describe parent and student responsibilities to engage in specific at home learning activities to promote student academic growth
- Explain how parents and the school will participate in regular, two-way communication
- Describe how the school and parents will build and develop a partnership to help children achieve the State's high academic standards

BIA schedules a meeting in August with parents to gather input on the school-parent compacts. The final school-parent compact will be distributed in October. Family Engagement Coordinators at BIA are responsible for ensuring all eligible students have received a school-parent compact.

BIA will follow the requirements listed below in developing the school-parent compact:

- Write in family-friendly language and to the extent practicable, in a language that parents can understand.
- Outline how parents, school staff, and students will share responsibility for student academic achievement and how they will build and develop a partnership to help students achieve the State's standards.
- Describe the district and school student performance standards, as well as provide ways in which the school will provide parents with strategies/activities to assist their child with the high-quality curriculum and instruction delivered.
- Describe the ways in which parents will be responsible for supporting their children's learning.
- Describe the ways in which students will be responsible for their learning.
- Address the importance of communication between teachers and parents on an ongoing basis through, at a minimum, parent-teacher conferences in elementary schools, during which the compact shall be discussed as the compact relates to the individual child's achievement; frequent reports to parents on their child's progress; and reasonable access to staff, opportunities to volunteer and participate in their child's class, and observation of classroom.

Annual Title I Meeting

All Title I schools are required to hold an annual meeting at the beginning of the school year, before November 1st. It is the responsibility of the Federal Programs Director to arrange meeting times and invite all stakeholders to the meetings. The Federal Programs Director will be responsible for collecting and submitting documentation of the required Title I Annual Meeting, including copies of sign in sheets, agendas, and multiple ways of inviting parents. Meetings are publicized via flyers sent to parents, e-mails, the website, social media, Remind101, DOJO and flyers posted in the building.

Annual Evaluation of Parental Involvement

The parent involvement policy is reviewed and revised annually with parents and other stakeholders (teachers, administrators, and other school personnel).

Process to Collect: BIA conducts individual meetings for review of the plan during the Spring Title I planning meeting. All parents, teachers, administrators, and other school personnel in the district are invited to the meetings to provide input. Invitations are sent in multiple ways including email, social media, Remind 101 and DOJO, announcements posted at the school and on the system website. For parents who are not able to attend a Spring planning meeting, a survey link will be posted on the main website and sent via email for providing input. As well, questions soliciting input on the policy will be included in the annual Title I Survey which is distributed as an announcement on the main website and also e-mailed to parents. The Title I Family Engagement Coordinator is responsible for collecting the required information (agendas, meeting notes, and sign in sheets, if applicable).

Process to Review: The GaDOE Parent Involvement Policy checklist will be applied to the plan. The results of the survey and the feedback from the planning meeting are shared among several groups of stakeholders, including, but not limited to, parents, school and central office employees, and community members. The results of the survey are used to review and revise TAP and parent involvement plans and components.

Actions Taken to Improve the Quality and Effectiveness of Parent Involvement Policies and Practices: The Title I Director reviews the annual spring survey results, as well as all feedback received during the annual needs assessment process at the strategic planning retreat. Additions/deletions/ revisions are discussed and agreed upon during this meeting. Formatting and revisions are made after the meeting and then provided to stakeholders for review and suggestions.

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

Capacity for Parent Involvement

Brookhaven Innovation Academy will use the GaDOE's Parent and Family Engagement Parent Capacity Checklist to document all of the following and will have it signed by the Title I Director:

- Parent meetings, such as the Annual Title I meeting, as the primary method of building parent capacity

- a. Presentation slides, training materials, handouts, or meeting minutes/notes that show evidence of the topics discussed will be made available on the BIA website
 - b. Sign in sheet to document names and roles of attendees, which is to include the date
 - c. Methods (2 or more) of invitation to all Title I parents and family members
- Continuous communications with parent such as using the social media postings, text messages, or links to articles, videos, newsletters, tip sheets, flyers, handouts, brochures, website screenshots, and other online resources relevant to the topics such as:
 - a. the challenging State academic standards
 - b. State and local academic assessments
 - c. Title I, Part A requirements
 - d. how to monitor a child's progress and work with educators to improve the achievement of their children
 - e. literacy training and using technology (including education about the harms of copyright piracy)
 - f. other reasonable support as parents may request

The FECs use input from parents, GaDOE materials, professional family engagement modules and other resources to create training modules; parents to foster improved communication and parent engagement. The FECs provide individual assistance to parents as needed.

Building Capacity

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

The Federal Programs Director considers and plans based on the six requirements for building capacity by answering the following questions:

- What strategies/materials have been offered to parents on understanding academic content standards?
- What training has been offered to parents related to literacy and the use of technology?
- How have faculty and staff been encouraged to communicate with and involve parents in their child's education?

- What efforts have been made to foster parental involvement in prekindergarten programs? (Not applicable for BIA)
- What attempts have been made to communicate parental involvement information to parents using language parents can understand?
- What other support do parents receive for parental involvement activities?

School Staff Capacity

BIA educates 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 parents and the school. Staff meetings are developed from materials in family engagement books, or from references on the GaDOE website to provide professional learning for the staff. BIA will use the GaDOE's Comprehensive Guide and Staff Capacity.

The Title I Family Engagement Coordinator will work to educate teachers, specialized instructional support personnel, principals, other school leaders, and other school 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 parents and the school.

Parent Input on 1% Set Aside

BIA does not currently receive a Title I allocation greater than \$500,000 and therefore is not required to set-aside an allocation for parent and family engagement. If BIA were to receive \$500,000 or more, all parents are invited to meetings in August and April to review the current year's 1% Parent and Family Engagement budget expenditures and provide input on the upcoming year's budget. The meeting would be recorded and input forms and sign-in sheets would be kept on file for documentation of these parent meetings.

English Learners Participating in Title I or Title III Supplemental Language Programs

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

Targeted Assistance Program

Overview

Title I, Part A is a federally funded program under the Elementary and Secondary Education Act (ESEA) of 1965. The purpose of Title I under ESSA is to ensure that all children have a fair, equal and significant opportunity to obtain a high-quality education and succeed on challenging state academic achievement standards and state academic assessments. Brookhaven Innovation Academy operates as a Target Assistance Program.

A targeted assistance program funds provide additional resources to meet the needs of those students that have been identified as those with the greatest academic needs. The purpose of Title I programs is to improve the educational program which should result in improving the academic achievement of all students, particularly the lowest achieving students.

A school is eligible to be targeted assistance program:

- If the LEA determines that the school serves an eligible attendance area.
- If school serves a school attendance area in which less than 40 percent of the students enrolled in the school are from low-income families.
- The program, activity or strategy is supplemental.

Targeted assistance Title I programs must:

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

Components of a Targeted Assistance Program Plan

Must create a plan to address the following components of the GaDOE Targeted Assistance Program Checklist:

- Comprehensive Needs Assessment
- Reform Strategies
- Plan Development
- ESSA Requirements for School wide Plans

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

requiring additional assistance and how to implement student achievement standards in the classroom.

Brookhaven Innovation Academy conducts a targeted assistance Program. Brookhaven Innovation Academy is both an LEA and a school. The District Improvement Plan and Title Assistance Plan are the same document for BIA. Brookhaven Innovation Academy, a State Charter School, has a continuous improvement process, which includes a well-established and embedded strategic planning process. Annually, BIA engages required stakeholders in planning for continuous improvement. All faculty and staff are surveyed for input around continuous improvement/strategic planning. All parents are surveyed annually through the Title I annual survey as well as the Parent Climate Survey. BIA completes a comprehensive needs assessment and seeks input from stakeholders, as outlined in the state charter contract. BIA conducts focus groups with the Federal Programs Director and parents of all students to both identify needs and seek possible solutions/actions for improvement. The Superintendent and Federal Programs Director hosts an annual strategic planning meeting where stakeholders work collaboratively to review all data components, prioritize needs and revise the strategic plan to address identified needs around the five areas of continuous improvement.

LEA Guidance

The Federal Programs Director reviews the checklist components and updates the district improvement plan/TA plan as necessary to meet checklist requirements. Superintendent support in developing, revising, implementing, and coordinating school improvement efforts during regularly scheduled Impact Checks to ensure implementation of the strategic plan and TA plan. During Impact Checks, data is analyzed to determine progress toward achievement goals, as well as to develop solutions to challenges related to instructional strategies, student performance around standards, parent involvement, professional learning, and budgets. Additionally, systemwide data teams meet quarterly to review and analyze leading student data in both EOG data. Data team members share the analysis with the appropriate personal and systemwide curriculum team members to ensure changes are made with instruction, curriculum and assessment. Federal Programs Director monitors the changes and all available resources are used to address student needs.

Targeted Assistance Program Plan Development

The plan will include effective methods and instructional strategies to strengthen the academic program through activities such as:

- Professional development for staff who work with participating students
- Expanded learning time
- Implement strategies to increase the involvement of parents of eligible students
- Review progress of **Title I participants**

- Provide an accelerated, high-quality curriculum for **Title I participants**
- Minimize the removal of children from the regular classroom
- A tiered model to prevent and address behavior problems
- Coordinate with and supporting the regular education program
- Annual evaluation and revision

The District Improvement Plan/School Improvement Plan is updated during and after the annual strategic planning retreat each summer. Stakeholders come together and work collaboratively to Data collected prior to the retreat is organized and shared: parent input from spring planning meetings, Title I parent survey data, faculty and staff survey data, student TA plan development process. During the retreat, instructional strategies, parental involvement initiatives, and professional development activities are planned after a careful analysis of the relevant data. The TA plan is reviewed and updated to be reflective of the decisions made during the retreat and after seeking Board input. It is through this process that the LEA oversees the development of school improvement plans.

Consolidation of Funds

Brookhaven Innovation Academy does not consolidate federal, state and local funds, including Title I-A, Title II-A, Title IV-A and IDEA.

Rank Order

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

Carryover

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

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

Title I, School Improvement 1003(g) Grant

BIA is not identified for school improvement and does not receive funds through a SIG grant. Should that change, we would follow the state guidelines required of such schools.

McKinney-Vento Program (MVP)

Education of Homeless Children and Youth

Introduction

Brookhaven Innovation Academy adopts the federal definition of homeless children and youth as defined in The McKinney-Vento Homeless Education Act. Under the McKinney- Vento Homeless Education Act, homeless children and youth are defined as individuals who lack a fixed, regular, and adequate nighttime residence. Brookhaven Innovation Academy will follow the requirements of the McKinney-Vento Homeless Assistance Act (reauthorized in 2004) to ensure that all students receive a free, appropriate, public education and are given meaningful opportunities to succeed in our schools.

Identification of Homeless Children and Youth

The registrar and staff are sensitive to the parents and are able to identify those who may not have a permanent home. Residency affidavits, which are required annually, are also a means of identification. These families are then referred to the Homeless Liaison for final determination of their status.

Homeless Children and Youth include:

- Are temporarily sharing the housing of other persons due to loss of housing, economic hardship, or a similar reason
- Are living in motels, hotels or camping grounds due to the lack of alternative adequate accommodations
- Are living in emergency shelters
- Are abandoned in hospitals
- Having a nighttime residence that is a public or private place not designed for or ordinarily used as a regular sleeping accommodation for human beings
- Are living in cars, parks, public spaces, abandoned buildings, substandard housing, bus or train stations, or similar settings
- Runaway children or children who are abandoned

Migratory children and unaccompanied youth (youth not in the physical custody of a parent or guardian) may be considered homeless if they meet the above definitions. Homeless status is determined in cooperation with the parents in the case of unaccompanied youth, the local educational agency liaison, and the district liaison.

Homeless children at BIA have access to the educational and other services that are available to all students. In addition, the Title I-A Homeless set aside funds can be used to pay for internet connectivity, transportation, field trips, school supplies or any other academic needs that parents of non-homeless students would provide.

Children are viewed with respect at BIA; therefore, this policy will not refer to children as *homeless* - it will instead use the term *children and youths experiencing homelessness*.

Definitions

The term *children and youths experiencing homelessness* includes students who are otherwise legally entitled to, or eligible for, a free, public education (including preschool), but who lack a fixed, regular, and adequate nighttime residence.

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

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

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

Immediate means without delay.

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

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

Local Liaison is the staff person designated by the system's LEA and each LEA in the state as the person responsible for carrying out the duties assigned to the liaison by the McKinney-Vento Homeless Assistance Act.

Identification Process

The Homeless Liaison in collaboration with community organizations and/ GaDOE, will identify children and youths experiencing homelessness in the district, both in and out of school, and maintain access to data regarding students in this situation. The liaison or designee will train school personnel on possible indicators of homelessness, sensitivity in identifying families and youth experiencing homelessness, and procedures for forwarding information indicating homelessness to the liaison. The liaison will also instruct school registrars and secretaries to offer homeless education information upon the enrollment and withdrawal of every student and to forward information indicating homelessness to the liaison.

Children and youths experiencing homelessness will be assessed, reported on, and included in accountability systems as required by federal law and U.S. Department of Education Regulations and Policy Guidance. The liaison will keep data on the number of children and youths experiencing homelessness in the district - where they are living, their academic achievement (including performance on state and district-wide assessments), and the reasons for any enrollment delays, interruption in their education, or school transfers.

School Selection

Each child and youth experiencing homelessness has the right to remain at his or her school of origin or to attend the school that serves students who live in the attendance zone in which the child or youth is actually living. Therefore, children and youths experiencing homelessness may remain at BIA to the extent feasible, except when doing so is contrary to the wishes of the child's parent or guardian.

Enrollment

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

Transitional students (both homeless and foster) are entitled to enrollment regardless of availability of paperwork. Paperwork should include: a) affidavit of residence for those sharing house with others; b) Hotel/motel receipts for those individuals living in hotel, motel, campground or similar setting; c) verification of living in shelter by a social worker; d) verification of living in a residency not designed for regular sleeping accommodations (cars, parks, public buildings, abandoned buildings, etc.)

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

Students identified as homeless are entitled:

- To enroll in school immediately with or without typical documentation such as medical records, proof of residency or school records.
- To continue in the school of origin or enroll in a public school in the district where they are temporarily housed.
- When feasible, to transportation to their school of origin or the school where they are to be enrolled.

- To participate in all activities that the school sponsors.
- To Title I services.
- To services without fear of discrimination.
- To receive all other educational and supplemental services that all students are provided.

During a parent conference, the Homeless Liaison will discuss available options to assist the family, such as providing lists of outside resources. Title I set aside funds will cover costs to assist transitional students to fully participate in school, such as providing Internet capability through a hotspot.

The Homeless Liaison will keep details of the conference with the parents and notate the discussions in the student information system. If the liaison deems necessary, she may sign permission slips for unaccompanied youth to attend field trips or other school sponsored activities.

Transportation

Transportation is not offered to any student at Brookhaven Innovation Academy; however, BIA may assist with transportation needs when needed by any student considered experiencing homelessness.

Services

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

Disputes/Complaints /Fraud

Written notice will be provided to homeless youth and their families when enrollment and continuation of a homeless child or youth in the school of origin is not feasible. If a dispute arises due to the determination, the process in the Education for Homeless Policy and Procedures manual

If a dispute arises over any other issue covered in BIA's Homeless policy or procedures, the child or youth experiencing homelessness shall be immediately admitted to the school pending final resolution of the dispute. The child shall have rights to all the privileges and services that a non-homeless student would have. Should a family provide false information regarding their situation, BIA, at its discretion, could withdraw the student and recommend a return to their local school district.

Level I Appeal – Homeless Liaison

- The Homeless Liaison will maintain a log of all disputes with time and date of receipt.
- The parent or unaccompanied youth may file a request for dispute resolution with the District Liaison by submitting a request for appeal in writing via email or completing the Dispute Resolution Form
- Within one business day, the Homeless Liaison will consider all documentation and make a determination. The Homeless Liaison will notify the parent or guardian of the determination in writing.
- If the parent or unaccompanied youth disagrees with the decision made at this level, the parent or unaccompanied youth shall notify the Homeless Liaison of their intent to proceed to Level II within two (2) business days of the Level I decision.

Level II Appeal – Superintendent

- The parent or unaccompanied youth may appeal the decision to the Superintendent, or the Superintendent's designee (the designee shall be someone other than the District's Liaison) using dispute resolution form provided at the Level 1
- The Superintendent or designee will provide a decision in writing to the parent or unaccompanied youth with supporting evidence and reasons, within three (3) business days of the Superintendent's or the designee's receipt of the appeals form.
- A copy of the appeals form, along with the written decision made at Level II is to be shared with the District's Liaison
- If the parent or unaccompanied youth disagrees with the decision made at Level II, the parent or unaccompanied youth shall notify the District's Liaison of their intent to proceed to Level III within two (2) business days of the Superintendent's written decision.

Level III Appeal – GaDOE

- The District Superintendent or designee should forward all written documentation and related paperwork to the GaDOE Department of Legal Services for review, within five (5) business days of being informed that the parent or unaccompanied youth would like to appeal the decision
- A complaint to GaDOE must be made in one of two ways:
 - In writing and signed by the complainant
 - Or Submitted electronically through the Department's online complaint process at: <http://programcomplaint.doe.k12.ga.us/everestwebportal/webform.asp>

GaDOE Contact: Eric McGhee, Grants Program Manager, Phone: (404) 344-4526, Fax: (404) 344-4526, Email: emcghee@doe.k12.ga.us.

Credit for Full or Partial Coursework

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

- Credit recovery opportunities in addition to the regularly scheduled BIA courses
- Awarding of half and full units of credit where appropriate

Training / Professional Development

All administrators, teachers and employees of the school will be provided professional development on the identification, services and sensitivity necessary when dealing with homeless children and youth. All identified or suspected homeless children and youths will be referred to the school's Homeless Liaison.

Homeless children at BIA have access to the educational and other services that are available to all students. In addition, the Title IA Homeless set aside funds can be used to pay for internet connectivity, transportation, field trips, school supplies or any other academic needs that parents of non-homeless students would provide.

The liaison or designee will conduct training and sensitivity/awareness activities for the appropriate school support staff at least once each year.

Coordination

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

Protocols

Brookhaven Innovation Academy does not receive direct funding from the McKinney-Vento Homeless Program. The system Homeless Liaison trains school personnel to identify children in homeless situations. A home survey is also used to identify homeless students. The system Homeless Liaison is consulted if any staff member suspects that a student qualifies for homeless services. The Homeless Liaison then investigates the situation and makes the ultimate determination on whether or not students qualify. When a student does qualify, the appropriate information is sent to the system registrar to be entered into the Student Information System. Title I, Part A funds are reserved to benefit the education of homeless students. Funds are allocated based on an annual analysis of student needs.

Services for Neglected and Delinquent Children

Brookhaven Innovation Academy is a State Charter School with no geographic boundaries within Georgia. Services for Neglected and Delinquent Children is not applicable for BIA.

Foster Care Transportation Plan

Transportation

Since BIA does not offer transportation, private and charter bus services may be contracted to provide transportation for eligible students. When a BIA student enters the foster care system, coordination and collaboration with the Child Welfare Agency EPAC unit and the court system will occur. The primary focus of this collaboration will be determining the best interest of the student's school stability. If a state approved transporter is not feasible, BIA will attempt to arrange a ride-sharing program to assist with transportation.

Planning

BIA is a state charter school. We stand ready to coordinate with them to support transportation of any student in foster care if necessary to retain continuity at students' school of origin.

- BIA agrees to the following no-cost plans:
 - Foster parent transports the child to school of origin (within 25 miles round trip).
 - BIA will contract for transportation within 25 miles if Foster Parent is unable to provide transportation. BIA will arrange payment to Foster Parent or transportation service for transportation farther than 25 miles round trip and/or utilize transportation companies for transporting further than neighboring counties.
 - Disputes will be resolved by BIA Superintendent

Transportation Plan

Brookhaven Innovation Academy does not operate a transportation system. We may extend contracted transportation services for Foster Youth for whom transportation is necessary. In addition, as an ongoing support for our student population, we provide gas vouchers if necessary for a student/family, and similarly provide public transportation passes in those communities with a public transit system.

Point of Contact

The Homeless/Foster Care Liaison is the point of contact for Brookhaven Innovation Academy.

Services for Neglected and Delinquent (Neglected Set –Aside)

BIA is not required to set aside funds for N&D.

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

BIA does not receive Title I Part C funds.

Title I, Part D Neglected, Delinquent, and At Risk (Grantees only)

BIA does not receive Part D funds.

Title VI, Part B Rural and Low-Income Schools Program

BIA does not receive Title VI funds.

Title II, Part A - Teacher and Leader Effectiveness

Purpose

Purpose: The purpose of Title II, Part A is to increase academic achievement by improving teacher and leader quality.

Equity Belief Statement

Brookhaven Innovation Academy believes all students should have equitable access to quality instruction. BIA exercises uses federal funding to best serve the unique needs of students seeking a second-chance opportunity to earn a high school diploma. Brookhaven Innovation Academy strives to recruit, prepare, train and support high-quality teachers, paraprofessionals and leaders who are adept at working with students in a non-traditional, second-chance environment. BIA is focused on developing school improvement plans with measurable objectives that will ensure that all teachers are and remain highly effective.

Annual Needs Assessment Procedures

BIA strives to gather input from ALL required stakeholders for the Title IIA Needs Assessment process. In March, the Federal Programs Director, in conjunction with the Superintendent and input from all stakeholders will facilitate a comprehensive needs assessment.

Parent and community members are given several opportunities to have input on both our needs assessment and our comprehensive school improvement plan in April, prior to our May leadership workshop. This input is via surveys and face-to-face meetings. During the May workshop, we examine every component of Title II to determine what our prioritized needs are for the following year.

The leadership team reviews how we recruit, the previous several years' staff and teacher retention rate, the percent of staff that does not meet applicable state requirements, academic achievement, parent/community/staff /student surveys, and other relevant data sources. The Title II staff survey gives information on school climate, professional learning needs, and leadership. The parent/community/student surveys give insights as to these stakeholder views on climate, leadership and teacher effectiveness. The Federal Programs Director will maintain a copy of all meeting sign-in sheets, agendas, returned surveys with data summaries/analysis components pertaining to the Title IIA annual needs assessment.

Sources used include student achievement data taken from assessment programs such as NWEA MAP and Georgia Milestones. The Title II surveys include information on school climate, leadership, teacher effectiveness, communication and professional learning needs. Recruitment, retention, and teacher experience and level of certification are available from the Superintendent/Human Resources office.

Implementation of the Equity Action Plan Procedures

Brookhaven Innovation Academy Equity Plan for Title IIA is revised each May-June using the results of the assessment surveys and other forms of current data. The Equity Plan serves as the plan detailing the professional learning and effective equitable practices among teachers.

School leaders, teachers, parents and community stakeholders will be involved in the revision process. Meeting agendas and sign-in sheets will serve as documentation for input.

Professional Learning

Professional Learning at BIA is standards based, results-driven, and job-embedded. It is designed to improve student achievement by enhancing teacher content expertise and developing appropriate pedagogical skills for working in a non-traditional, second-chance opportunity school. Professional Learning needs are assessed during the Comprehensive Needs Assessment process. Student MAP data, Milestone data, and performance data are analyzed, and desired outcomes are stated. The Federal Programs Director and School Leaders review the combined data to collaboratively develop plans for professional learning. Once plans are designed and approved, the focus becomes the implementation of quality professional learning. Evaluations of professional learning training sessions and the analysis of the evaluations are ongoing. Adjustments in content and skills to be addressed are continuous.

Assessing, applying, and sustaining content knowledge and skills that educators need to improve student learning are priorities.

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

Determining the Effectiveness of Title IIA Funded Professional Learning Activities Procedure

The effectiveness of Title II A professional development will be assessed through monitoring of the intervention. The Title II-A funded activities in each major program component are analyzed and a plan is developed to assess the effectiveness of each activity. The plan is submitted in the consolidated application (ConAPP) as a part of the budget requirements. For each activity, the following are addressed: The Title II-A component the activity addresses; a description of the activity; the data to be collected to determine effectiveness; the position of the person responsible for collecting the data and coordination the review and analysis of the data; and the timeline for collecting data and completing the review and analysis of the data. Careful attention is given to distinguishing between data/documentation that shows implementation versus data/documentation that shows effectiveness. The Effectiveness Plan is used throughout the year in monitoring program implementation and effectiveness and guides the needs assessment process for the following year. The Effectiveness Plan should be revised and uploaded if a budget amendment is submitted due to a change in needs and/or a significant change in budgeted strategies. All source documentation is maintained in files, both hard copy and electronically, in the Federal Programs office

Professional Learning is embedded in the staff meetings on a regular basis. Teachers who go to conferences or workshops are required to share what they learned with other appropriate staff.

Conference Request Policy and Procedure

BIA teachers and administrators may submit conference requests for sessions that directly relate to improving teacher and/or leadership quality. The focus of the conference must be aligned with the school's prioritized needs and must support teacher professional development across core academic subjects. In addition, the information gathered at the conference, must be actively applied upon the team's return and redelivered in a way in which effectiveness can be measured.

This process includes all outside events related to professional development as delivered through conferences, training, workshops, seminars, and similar functions.

The steps for making and approving a conference request are outlined below:

1. Core Academic Teacher, Lead, Administrator, or other Staff Member makes the conference request to the Superintendent within at least 30 days of the conference date. The staff members must submit a Professional Development Leave Form, Profession Development Redelivery Form, if applicable, and Preliminary Purchase Order.
2. The request must go to the Superintendent for approval, if declined, the workflow will stop. If approved, the form continues to the next approver.
3. Approval from the Superintendent, the form will be sent to the Federal Programs Director who will review the request and determine the funding source.
4. Once the funding source is provided, the Business Manager and/or Requestor will receive a form requesting the placement of the Purchase Order. The Requestor will complete all steps of the Preliminary Purchase Order form.
5. Once final approval is made the Business Manager will follow through with the requestor with steps for all purchases to include conference registrations.
6. Following the conference, one attendee will schedule a Redelivery Plan with the Superintendent. The attendee will also submit a copy of the conference agenda.

Equity Plan

The previously described process is used to guide the development of the Equity Plan, which is completed and posted by June of each year. Each equity indicator is rated and summary information provided. At least one equity indicator is selected for focus and an action plan is developed to address the area of focus. The Federal Programs Director monitors the implementation of the Equity Plan and area of focus, while collecting the documentation required as evidence of effective implementation. All source documentation is maintained in files, both hard copy and electronically, in the Federal Programs office.

Policy for the Use of Title IIA Funds for GACE Fees and/or Gifted Endorsement Fees

GACE testing and the Gifted Endorsement may be supported by Title II, Part A to the extent that it supports career advancement focusing on leadership opportunities and multiple career paths. For example, Title II, Part A could be used to pay for these assessments for paraprofessionals recruited to be teachers or teachers expanding content areas and service areas, and teachers recruited to be teacher leaders or school leaders.

BIA teachers that take the GACE to receive certification in content areas in order to meet professionally qualified requirements must submit the following in order to receive reimbursement:

- Request for prior approval from School Director and Federal Programs Director.

*Include GACE Test(s) that is/are to be taken (include date, location and reason).

- Receipt
- Passing test scores

BIA teachers enrolled in RESA's Gifted and Talented Endorsement Cohort to receive certification in gifted in order to meet professionally qualified requirements.

- Request for prior approval from School Director and Federal Programs Director.

*Include RESA course information that is/are to be taken (include date, location and reason).

- Completion certification

Procedures:

- BIA teacher will request approval in writing from the Superintendent.
- Superintendent will request approval in writing from the Federal Programs Director, citing the need for the certification.
- Upon approval from HOS, the BIA teacher will register for the test and pay for the test out of pocket.
- BIA teacher will provide receipt and copy of passing test scores to the HOS and Business Manager.

Procedures for Ensuring that Title IIA Professional Learning Activities Evidence-Based

BIA requires that all professional development be evidenced-based, high quality, sustained, intensive, and classroom focused in order to have a positive and lasting impact on classroom instruction and teacher performance in the classroom. It must address one or more of our prioritized needs. Finally, professional development on increasing the ability of the staff to help all students achieve high academic standards, or the school administrative staff to lead the school's efforts to increase student academic achievement.

The BIA Professional Learning (Conference Request) form has a section to complete that includes evidence that the training is Evidence based according to ESSA or has a logic model to show likely success prior to approval by administration.

Professional Qualifications of Teachers

Brookhaven Innovation Academy seeks to hire qualified teachers and administrators. Vacancies are posted on the webpage for Brookhaven Innovation Academy. A job description is included as well as job requirements. This ensures that the applicants have met the minimum qualifications to meet the required professional qualifications. BIA has flexibility and may waive certification for all teachers except Special Education. For teachers employed with Brookhaven Innovation Academy whose professional certification is waived, the minimum requirements are

that each educator shall hold a bachelors degree and clearance certificate within 90 days of employment. The recommended and approved candidates are fingerprinted and will complete other onboarding paperwork.

Parents are informed of their rights to know the qualifications of their children's teacher. In the August of each year, the student-parent handbook is updated to include the Parents Right to Know information. As well, the Parent Right to Know is posted on the school website. Accountability/Compliance Director is responsible for providing a copy of the student-parent handbook containing the Parent's Right to Know to the Federal Programs Director as evidence of parental notification of their Right to Know. If the Parents Right to Know is inadvertently omitted from the student handbook, the Federal Programs Director will notify each parent of their Right to Know via 1st class mail before the end of the first week of school, or upon enrollment as BIA has a year round enrollment policy. In this case, a copy of the notification letter will be provided to the Federal Programs Director.

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

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

Any Brookhaven Innovation Academy teacher or paraprofessional who does not meet the district's professional qualifications or who holds a non-renewable certificate will have an individualized remediation plan to meet the professional qualifications or gain a clear renewable certificate. The remediation plan will be developed collaboratively with the teacher, Superintendent at the time of hire or when non-PQ status or non-renewable certificate is determined. All remediation plans are monitored quarterly.

Professionally Qualified Paraprofessionals Hiring Procedures

Qualified applicants must meet two of these criteria and provide documentation confirming:

- Completion of 60 semester hours or 90 quarter hours of postsecondary coursework through an accredited school; or

- Completion of an Associate's Degree through an accredited school; or
- Have a passing score on the Parapro Assessment acceptable in Georgia.

Parents' Right to Know

At the start of school, the Federal Programs Director must notify parents of their right to request the professional qualifications of their child's teachers and paraprofessionals using the District's template. This should be sent home in the student handbook and posted to the District webpage. A sample of the handbook acknowledgement form should be forwarded to the Federal Programs Director. Students enrolling after the beginning of school receive a copy of the handbook upon enrollment. Receipt of the handbook is recorded by a parent/ guardian signature.

Timely Notification of Parent "Right to Know" Procedure

The "Right to Know" information for parents is located on BIA's website and is included in the Parent and Family Engagement Policy and Welcome Packet distributed to all parents.

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

Purpose

The purpose of the state-funded ESOL program is to assist students to develop proficiency in the English language, including listening, speaking, reading, and writing, sufficient to perform effectively at the currently assigned grade level. The purpose of the federally-funded Title III supplemental program is to ensure that English learners (ELs) and immigrant students develop English proficiency and meet the same academic content and academic achievement standards that other children are expected to meet.

BIA does not receive Title III funds.

Student Assessment, Identification, and Enrollment Procedures

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

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

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

Exit Guidelines

According to GaDOE guidelines, a kindergarten student must score a Composite Proficiency Level (CPL) of 5.0 or higher, a Writing subscore of 4.5 or higher, and no other individual domain score less than 5.0 in order to exit the ESOL program. Students in grades 1-12 who score a CPL of 5.0 or higher are considered English proficient and are exited from English language assistance services in accordance with GaDOE guidelines. As allowable under State ESOL program guidelines, BIA also elects to exit all students in grades 9-12 who achieve an overall score of 4.3-4.9 and to conduct classification Review meetings to determine readiness to exit for all students in this range.

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

Funding

Brookhaven Innovation Academy does not receive direct funding for Title III and does not participate in a Consortium. BIA utilizes general funds to staff ESOL programs and purchase instructional materials, provide professional learning, conduct parent outreach, and hire the necessary personnel to ensure that the needs of English Learners (ELs) are met.

Professional Learning

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

Parent Outreach

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

The aforementioned Translation and Interpretation Services Plan guides district staff in supporting parents in need of language assistance. Upon registration, the district asks parents to indicate their preferred language for oral and written communications. To the extent practicable, communications are provided in the parent's preferred language. Resources available to assist with translations and interpretation include Language Line, a phone-based interpretation service with over 180 language options; and district translator/interpreter (Spanish). Other services are contracted on an as-needed basis.

Supporting the Unique, Non-linguistic Needs of Immigrant Students

Immigrant students who qualify for English language assistance services are supported through the ESOL program. Regardless of English proficiency, immigrant students often arrive with myriad non-linguistic needs. Supplemental instructional materials and/or tutoring are provided to address academic gaps. Assistance with foreign transcript evaluation is provided to students entering with high school credits from another country. Counselors and social workers connect families with district- and community-based services to support non-academic needs such as health, counseling, food, housing, etc.

Program Evaluation and Accountability

The success of the ESOL instructional program and Title III supplemental programs and initiatives will be measured by analyzing the results of English Language Proficiency (ELP) assessments, academic assessments, and other available measures. As a result of this analysis, programmatic and instructional adjustments are implemented as appropriate.

Title IV, Part A- Student Support and Academic Enrichment

The Title IV program funds provide funding to BIA Charter School as the Student Support and Academic Enrichment Grant. Authorized in the Every Student Succeeds Act (ESSA) Title IV, Part A has a wide range of allowable uses. 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, (like music, arts, social, etc.)
- Improve school conditions for student learning, (safety, parent support, mentor program, drug prevention, etc)
- Improve the use of technology in order to improve the academic achievement and digital literacy of all students. (personalized learning, collaboration, limited on tech purchasing, etc)
- The grant has transferability to Title I.

Use of Funds

The school system makes a determination of how funds will be spent following a needs assessment process in which a variety of stakeholders participate. Needs are then prioritized and funded depending upon the availability of funds. Funds must still be drawn down as separate funding. The Federal Programs Director shall coordinate and lead the monitoring of the system's use of Title IV funds. The review is a means of holding BIA accountable for appropriate use of resources. By reviewing local activities and needs, the program monitoring allows effective implementation and the need for technical assistance.

Individuals with Disabilities Education Act

IDEA procedures, including those for SST, Child Find, Evaluation/Re-evaluation, Eligibility, and Discipline, can be found in Brookhaven Innovation Academy Special Education Department Handbook

Appendix A: Complaint Procedures

Grounds for a Complaint:

Any individual, organization or agency may file a complaint with the Brookhaven Innovation Academy if that individual, organization or agency believes and alleges that the BIA is violating a Federal Statute or regulation that applies to a program under the Elementary and Secondary Education Act of 1965 (ESEA). The complaint must allege a violation that occurred not more than one (1) year prior to the date that the complaint is received, unless a longer period is reasonable because the violation is considered ongoing.

Filing a Complaint:

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

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

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

The complaint must be addressed to:

Tedra Norwood
Federal Programs Director
Brookhaven Innovation Academy
3159 Campus Drive
Norcross, GA 30071

Investigation of the Complaint:

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



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

Please Print

Name (Complainant): _____

Mailing Address: _____

Phone Number (home): _____

Phone Number (work): _____

Program complaint is being filed against: _____

Date on which violation occurred: _____

Statement that the Brookhaven Innovation Academy has violated a requirement of a Federal statute or regulation that applies to an applicable program (include citation to the Federal statute or regulation):

The facts on which the statement is based and the specific requirement allegedly violated: (Attach additional sheets if necessary.):

List the names and telephone numbers of individuals who can provide additional information:

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

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

Signature of Complainant: _____ **Date:** _____

Mail this form to:
Tetra Norwood
Federal Programs Director
Brookhaven Innovation Academy
186 Hunter Street
Norcross, GA 30071

Appendix B: Tracking Form for Resolution of Complaints

**Brookhaven Innovation Academy Federal Program
Tracking Form for Resolution of Complaints**

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