

Richard Woods, Georgia's School Superintendent *"Educating Georgia's Future"* gadoe.org

# State Charter Schools Checkpoints for FY15

March 2015 GCEL Conference

### Presenter



Richard Woods, Georgia's School Superintendent *"Educating Georgia's Future"* gadoe.org

#### Randy Phillips, Ed. D. Georgia Department of Education School Improvement – Federal Programs Title I Education Program Specialist <u>rphillips@doe.k12.ga.us</u> (770) 334-8390



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#### **SCHOOL IMPROVEMENT & DISTRICT EFFECTIVENESS**



# **Session Agenda**



- Preparation for successful monitoring experience
- Address most common monitoring findings for State Charter Schools
- Identify monitoring issues that just don't seem to fit in a State Charter School environment
- Find solutions for those factors above to assist State Charter Schools experience a successful Cross-Functional Monitoring visit and a positive Title I Program implementation for FY15



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# Federal Programs Cross-Functional Monitoring

# Four Ways of Monitoring



- Department review of the Consolidated Application approval process – CLIP and Program Budgets
- Department review of LEA single audit documents
- Department review of LEA Self-Assessment Checklist
- Department review during on-site monitoring



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### **Cross-Functional Monitoring Schedule**

FY15	FY16	FY17	FY18
ССАТ	Atlanta Heights	Fulton Leadership	Provost
Ivy Prep Gwinnett	Coweta Charter	lvy Prep @ Kirkwood (Girls)	Utopian
GACA	Pataula	Ivy Prep @ Kirkwood (Young Men)	
GCA	Cherokee Charter	Mountain Ed Center	
	Odyssey		

# **Mock Visit**



- Practice makes perfect (sort of)
- Take the monitoring instrument and review the current system in place
- Interview selected personnel ("test")
- CONDUCT PRIOR TO VISIT
  - Chance to change systems as needed
  - Chance to create corrective action plans and begin implementation as needed

# **Preparation Prior to On-Site Monitoring**



- LEAs must provide a room large enough to accommodate the entire monitoring team. If need be, more than one room can be used
- With inclusion of private interviews additional rooms (simple as an office) will be required
- LEAs must provide Internet access to the monitoring team
- LEA staff need to be present during the monitoring visit. It is important that other meetings requiring LEA staff are not scheduled during the monitoring visit

# Preparation Prior to On-Site Monitoring



- LEAs are required to provide supporting documentation that is not already available to the Department's Cross-Functional Monitoring Team
- Current Year documentation for each required descriptor should be placed in a folder for team review
- Items too large to be placed in folders should be readily available and with required items clearly identified

## **Preparation Prior to On-Site Monitoring**



- Items too large to be placed in folders should be made available via Internet
- Print outs of cited Web site links should be provided to the Department's Cross-Functional Monitoring Team
- Detail expenditure and payroll history reports for all programs monitored will be requested four weeks prior to the monitoring visit via a provided upload link on the internet to the Department's Title Programs Director



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# Common Findings Across the Board

# Written Policies and Procedures

- Conflicting policies
- Out-of-date policies
- Non-existent policies

→ If you have to explain how something is done without being able to point to a clear and current written policy or procedure, you probably have some work to do!!!



# Fiduciary



- Timely review and approval of LEA applications
  - o CLIP
  - o Budgets
  - Completion Reports
- Period of availability of funds to LEAs
  - o July 1, 2014 September 30, 2015
  - Watch software contract begin/end dates

# Fiduciary



- Timely obligation and liquidation
- Timely drawdowns
  - o 9 GAOR drawdowns a year
  - All drawdowns must be supported by previous expenditures

# Fiduciary



- Ensuring Funds are Used for Allowable Uses
  - o Consistent with Federal Cost Principles?
  - o Consistent with EDGAR?
  - o Consistent with program-specific rules?
  - o In a Department approved budget?
  - How does LEA ensure and document allowability?
  - Is Allocable and Allowable
  - Is Reasonable and Necessary



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# Fiduciary

- Program-specific Fiscal Rules
  - MOE (Waiver completed for those Charters that qualify)
  - Supplement not Supplant

### Georgia Department of Education

### **FY15 Monitoring Form**



- Items column
- Requirements column
- Documentation on file at the LEA column
- Documentation on file at the Department column

OVERARCHING REQUIREMENT			
1. LEA Monitoring of Schools and Programs			
ITEMS	REQUIREMENTS	DOCUMENTATION ON FILE AT THE LEA/TO BE SENT TO THE DEPARTMENT TO VERIFY COMPLIANCE	DOCUMENTATION ON FILE AT THE SEA (DEPARTMENT) TO VERIFY COMPLIANCE
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# **Review of Descriptors** and Required Documentation **That MAY Be Confusing for State Charter Schools**





# **Overarching Requirement**



- What processes does the LEA use to monitor it's federal programs?
- How frequently are federal programs monitored?
- What findings have been made in the most recent monitoring year?

# Overarching Requirement



- How does the LEA ensure that findings are corrected?
- How does the LEA monitor/compare school expenditure requests with needs listed in the SWP, TA, & CLIP?

## Monitoring of Federal Programs



- Written Procedure Manual
- Emails
- Memos
- Dated meeting agendas
- Dated sign-in sheets

## Monitoring of Federal Programs



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- Checklists with comments
- Record of physical inventory of equipment and real property (Dated & Signed)

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# Comprehensive LEA Improvement Plan (CLIP)



- Copy of dated meeting agendas, sign-in sheets (with roles identified), etc. to show evidence of periodic review, evaluation, and revision of CLIP
- Dated sign-in sheets that include stakeholders representing teachers, administrators, other appropriate school personnel, parents, and children in school receiving Title I services



Requirement	Documentation
Parent notifications are in an <b>understandable</b> and <b>uniform format</b> in a <b>language</b> parents can understand	<ul> <li>Translated parent notifications</li> <li>Flyers, letters, webpages, and other communications in family-friendly language</li> </ul>
LEA provides guidance to schools about <b>timeliness</b> and <b>requirements</b> of parental notices for schools identified as Priority, Focus, and Title I Alert	<ul> <li>Emails</li> <li>Checklists</li> <li>Meeting agendas</li> <li>Sign-in sheets</li> </ul>



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#### Requirement

LEA notifies parents of:

- School Designation Status
- ESEA Flexibility Waiver Status
- ESEA Public School Choice or IntraDistrict Transfer Option
- Flexible Learning Program
- Teacher Parapro Qualifications
- Highly-Qualified Teachers

### **Documentation**

- Letter, student handbook, newsletter, website, flyers
- NA
- NA
- NA
- Mailed dated letter, student handbook (signature required)
- Mailed dated letter/sample



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#### Requirement

LEA provides technical assistance to schools to develop capacity to plan and implement effective parental involvement practices, school parental involvement plans, and school-parent compacts

#### Documentation

- Meeting agendas (Faculty Mtgs)
- Sign-in sheets
- Guidance and sample communication materials
- Timelines and checklists
- Disseminated materials on effective parental involvement practices
- Training materials, flyers, emails, letters, or surveys



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Requirement	Documentation		
LEA parental in the ment plans develope <b>ntly, a. ed upon with</b> <b>parents</b> d <b>h ed</b> y trly. LEA's <b>process</b> collect eview LEA's plans and be determine effectiveness	<ul> <li>LEA parental incoment plans with year vision e (month, day, and ear, cove page</li> <li>Flyers, in eations, e das, sign-in sheets, minimum ent feedback</li> <li>Written description of process</li> </ul>		
School parental involvement plans	School parental involvement plan		

School parental involvement plans developed jointly, agreed upon with parents and revised yearly. LEA's process to review school plan and practices to determine effectiveness

- School parental involvement plan with yearly revision date (month, day, and year) on cover page
- Flyers, invitations, agendas, sign-in sheets, minutes, parent feedback
- Written description of process



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#### Requirement

Completed and revised school policy/plan has been distributed in **multiple ways** to **all parents and** available to the **local community** in a timely manner.

#### **Documentation**

- Student handbook
- Newsletter
- Website
- Title I annual meeting agenda and sign-in sheets
- Flyers
- Sent home with each student



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#### Requirement

Schools have a **signed and dated** school – parent compact that has been developed **jointly with parents**, **students**, **and school staff** and contains all **required academic components** as well as, **parentteacher conferences** at the elementary school at least annually, **frequent reports** to parents on their child's progress, ...

#### **Documentation**

- School parent compact (signed and dated by student, school, and parent on the compact or on the compact cover page in timely manner)
- Meeting agendas, minutes and sign-in sheets
- Record of parent feedback
- Flyers, meeting notices





Requirement	Documentation
Schools convene <b>Annual</b> <b>Title I Meeting</b> to <b>inform</b> parents of the Title I program in a <b>timely</b> <b>manner</b>	<ul> <li>Meeting agenda</li> <li>Meeting minutes</li> <li>Sign-in sheets</li> <li>Meeting notices</li> </ul>
Annual <b>evaluation</b> of the content and effectiveness of the LEA's and school's parental involvement plan and activities with a <b>summary of results</b>	<ul> <li>Annual parent survey with summary of results</li> <li>Meeting notices, meeting agendas, sign-in sheets</li> <li>Record of parent feedback</li> </ul>

#### **Parental Involvement**



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Requirement	
LEA involves <b>all parents</b> in the	•
Comprehensive LEA	
Improvement Plan (CLIP) and	
school improvement plan/	•
schoolwide/targeted assistance	
plan(s) and provides technical	
assistance and support to schools	
about parental consultation and	
participation in the development	•
of these plans	

#### **Documentation**

- LEA/School Parental Involvement Policy describing process
- Copy of CLIP
- Meeting agendas, sign-in sheets, announcements, minutes and parent feedback
- Sample communications for technical assistance



#### **Parental Involvement**

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#### Requirement

LEA and schools carry out the **six requirements** to build **parents' capacity** to be involved in school and their child's education (particular attention should be placed on professional development on parent engagement to all school staff)

#### Documentation

- Meeting agendas
- Meeting notifications
- Power points of training materials
- Sign-in sheets
- Newsletters, tips sheets, flyers
- Brochures
- Parent trainings
- Letters





Requirement	Documentation
LEA and schools have informed parents of the existence of parent resource center, if applicable	<ul> <li>Newsletter, Flyers</li> <li>Student handbook</li> <li>Web site</li> <li>Brochures</li> </ul>
LEA receiving over \$500,000 reserves at least 1% of its Title I, Part A allocation for parental involvement and <b>all parents</b> the opportunity to be <b>involved in</b> <b>decisions</b> about the use	<ul> <li>Record of parent feedback</li> <li>Meeting agendas, sign-in sheets,</li> <li>Meeting notices, flyers, handouts</li> <li>Invoices</li> </ul>

#### ESEA Public School Choice (Choice)





## **Schoolwide Programs**



- Copy of SWP plans that include the ten required components from the Elementary and Secondary Education Act of 1965 (ESEA) with the date of revision on the cover page
- Please go ahead and include all 18 components
- Copy of SWP checklist signed by the Title I director

#### **Schoolwide Programs**



- Copy of written communication from LEA providing guidance to schools about development, implementation, and evaluation of SWP requirements (Faculty Mtg Agendas)
- Examples of activities that support the intent and purpose of federally funded programs
- Copy of purchasing procedures

## New Schoolwide Programs



- Application For SWP Intent Due August 15<sup>th</sup>
- Documentation for planning of new SWP
  - Name of outside technical assistance provider
  - Copies of dated minutes, timelines, agendas from planning meetings
  - Copy of SWP plan
  - Copy of the intent to become schoolwide



- Copy of guidance to schools on TA program requirements
- Copy of dated sign-in sheets showing that staff paid with TA funds participate in professional learning activities with regular funded staff
- Copy of school TA plan detailing how the TA program is coordinated with and supports the regular program
- Involvement of ALL stakeholders in TA Plan development
- TA Checklist signed and dated by Title I Director



- Listing effective instructional strategies that strengthen the core academic program of the school
- Written procedures for identifying eligible students in each content area



- Copy of student selection form

   Must use multiple educationally related criteria
- List of eligible students in rank order by content area
- List of students served by content area
- Carefully consider number of content areas served in correlation with Title I allocation



- List of scheduling models
  - Should minimize removal of children from regular classroom during school day
  - Must not replace state required "seat" time
- Copy of teachers' schedule
- Copy of class rosters for students receiving Title I services

#### **State Audits**



- Copies of two most recent audit reports (A-133)
  - A-133 criteria found to be not necessarily applicable to charter systems
  - Charter Division/Commission addressing issue
- Copies of written procedures for the resolution of audit and cross-functional monitoring findings
- Evidence of corrective action plan when required

## Maintenance of Effort (MOE)



- Will be calculated by the Department

   Exceptions: New Special State Charter schools
   Current years compared FY12 & FY13
- Those not open in FY12 & FY13 must complete MOE Waiver and attach to Con App
- Documentation required only for districts that do not meet the required MOE

#### Allocations and Carryover



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 Copy of worksheets and detailed expenditure report showing the amount of parental involvement funds (required 1% set-aside) carried over to the next fiscal year or that all funds were expended

Required Set Aside in FY14	FY14 Required Set Aside Amount	FY14 Actual Expenditures** of Required Set Aside	Amount NOT Expended Thus required to Carryover in FY15 Budget
Parental Involvement	\$3,500	\$2,999	\$501
	**	Detelled Fundarelitume F	Demonstra Attack ad

\* Detailed Expenditure Reports Attached



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- Copies of LEA financial internal control policies and procedures
- Copies of LEA accounting reports to include:
  - Chart of accounts
  - Budget reports
  - Detailed expenditure reports
  - o Detailed General Ledger for Title I
  - Payroll distribution report

Copy of 1512 report (RT3 ONLY)



- Supporting source documentation (voucher package)
  - o Invoices
  - Purchase Orders
  - Travel vouchers and agendas for conferences
- Copy of payroll verifying that the number of employed staff is equal to the number approved in the Consolidated Application (School Allocation tab)



- Copy of written plan detailing when after-the-fact periodic certifications will be conducted
- Copy of after-the-fact periodic certifications for each person paid 100% with federal funds
- Monitoring Team will need to see the 2 most recent periodic certification records (usually the previous spring and most recent fall semester)



- Copy of procurement policies for consultants and contractual agreements
- Sign-in sheets, evaluations, or other documentation that verify performance/deliverables
- Copy of travel authorizations and vouchers paid using Title I funds



- Copies of time logs for any split-funded personnel being paid with federal funds
  - Schedules identifying the time and federal fund source may be used for personnel with fixed daily schedules
  - Schedule must have signature of the employee and supervisor on a monthly basis, with dates of signatures
- Copy of purchase orders for use of capital expense funds (object code 700) with prior approval notification from the Department's Title Programs Division

## Supplement Not Supplant



- Federal funds are used to supplement or increase non-federal sources used for education of participating children
  - Copy of approved school budgets
  - Copy of purchase orders indicating expenditures of federal funds at the LEA and school level
  - Copy of detailed expenditure reports
  - Roster showing LEA allocation of personnel
  - Copy of written purchasing procedures

## Equipment and Real Property



- Copy of purchase orders documenting purchases of equipment or real property with federal funds
- Copy of contracts for equipment leased with federal funds
- Copy of inventory records showing item description, cost, date of purchase, vendor, serial number or other identification number, location, fund source, use and condition, and disposition information EDGAR 80.32 & 2 CFR Part 225 (Old OMB A-87)

## Equipment and Real Property



- Records/logs of dates of physical inventories with date of review and signature of person conducting the review
- Copy of equipment use plan for TA schools
- Copy of LEA Equipment Disposition Policy to include EDGAR requirements EDGAR 80.32 & 2 CFR Part 225 (Old OMB A-87)

## **Cash Management**



- Copy of written internal control procedures that include:
  - Segregation of duties
  - Reconciliation
- Supporting financial records for LEA drawdowns
  - o Expenditure reports
  - o Reconciliations
- Copy of drawdown requests that are consistent with DE 0147, supported by accounting records



- Copy of LEA written procedures/policy for the McKinney-Vento Education of Homeless Children and Youth (EHCY) program containing all <u>required</u> <u>components</u>, indicating annual revision and/or review date (month, date, and year)
  - o Identification
  - School Selection
  - o Enrollment
  - o Transportation
  - o Disputes



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 List of schools and number of homeless children and unaccompanied homeless youth enrolled at each LEA school. (Student roster by student identifier and/or name and school)

Georgia Department of Education



- Copy of flyers, handouts, written procedures for notifying stakeholders, program brochure, posters that identify Homeless Liaison with contact information
- List of community locations where homeless liaison contact information is posted (i.e. schools, shelters, United Way)



- Training session schedules, emails, minutes, sign-in sheets, agendas, materials (including the LEA homeless policy) for key school personnel training
  - Some of these training sessions should take place in the Fall so that stakeholders are aware of McKinney-Vento throughout the school year
  - Key personnel should include, but not be limited to counselors, social workers, administrators and parents/guardians



- Evidence of joint trainings and/or meetings with parents/guardians, unaccompanied youth and LEA Transportation Department personnel to inform and facilitate coordination – Include schedules, agendas, training materials, sign-in sheets, emails and request forms
- Evidence of comparable services (student schedules/rosters, meeting minutes, emails, agendas, sign-in sheets) should include comparable services provided (ex. Title I, 21st Century, ESOL, IDEA, Voc. Ed., gifted and talented programs)



#### Title II, Part A

#### **Highly Qualified Teachers and Paraprofessionals**

- Copy of current payroll report for Title IWritten procedures, personnel policy, and/or vacancy posting for Title I instructional paraprofessionals indicating qualifications
- Copy of Title I funded instructional paraprofessional's schedule indicating teacher providing direct supervision



#### Title II, Part A

#### **Highly Qualified Teachers and Paraprofessionals**

- Samples of guidance to principals and teachers in Title I school regarding duties and assignments of paraprofessionals
- Copy of completed Title I, Part A and Title II, Part A Principal Attestations and Assurances form for each school



#### Title II, Part A

#### **Parent Notification**

- Written procedures describing how LEA will notify parents of their right to request the professional qualifications of their child's teachers and paraprofessionals
- Copy of written notification to parents



## Title II, Part A

#### **Parent Notification**

- Written procedures describing how LEA will provide timely notification to parents when their child has been taught 20 or more consecutive days by a non-Hi-Q teacher (including substitute teachers)
- Copy of letters mailed to parents
  - Letters must be dated and signed by principal or designated LEA official
  - Evidence that letters were mailed (copy of address labels, class roster with notation of date letters mailed, one or more returned letter, postage meter receipt)

#### Title I, Part C Migrant Education Program Services



- Records Maintenance and Transfer
  - SIS report of current K-12 migrant coded participants; current enrollment verification form; current participant verification form; new participant report verification form (if applicable)
  - Copies of local communication (letters, memos, faxes, telephone logs) between LEA and sending or receiving schools regarding student educational and health data
  - o Department will review MSIX usage for MEP funded personnel

#### **State Charter Schools**



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 Copy of the notification of new or expanding Special State Charter School sent to the Department no later than April 1st

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# Complaints, Ethics and Fraud, Waste, and Abuse

#### **Complaint Procedures**



- Copy of LEA complaint procedures that include a process for tracking complaints and reports of their resolution
- Documentation that information on the complaint process has been disseminated to staff

#### Ethics and Fraud, Waste, and Abuse



- Copy of LEA's fraudulent activity policy or administrative regulations
- Copy of written procedures for dissemination of the LEA's fraudulent activity policy or administrative regulations to all employees

   Dated agendas
   Dated sign-in sheets

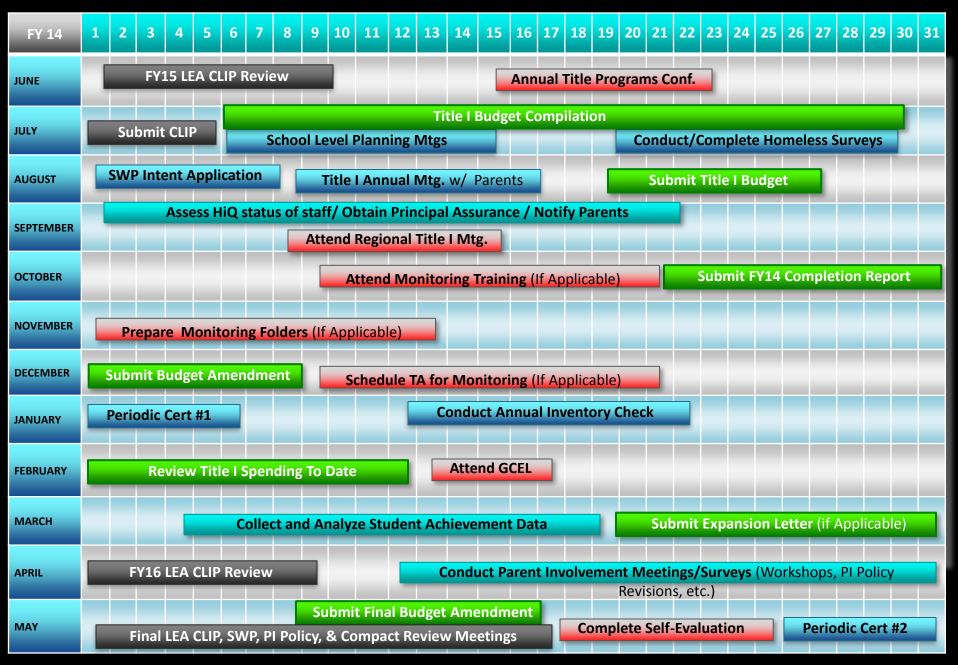


#### Ethics and Fraud, Waste, and Abuse

Questions:

- Are you aware of any fraudulent activity occurring in this program?
- 2. Have you been asked to participate in any fraudulent activity for this program?
- 3. How is this policy/procedure disseminated to all employees/staff?

#### TITLE I IMPLEMENTATION CALENDAR



It's sometimes dependent on which direction you look at things!



# Questions

Georgia Department of Education

#### Title I, Part A Program Specialists' Contact Information



Area	Name	Office	Email
		Telephone	
1	Robyn Planchard	(404) 985-3808	rplanchard@doe.k12.ga.us
2	Randy Phillips	(770) 221-5232	rphillips@doe.k12.ga.us
3	Anthony Threat	(706) 615-0367	anthony.threat@doe.k12.ga.us
4	Evelyn Maddox	(404) 975-3145	emaddox@doe.k12.ga.us
5	Judy Alger	(229) 321-9305	jualger@doe.k12.ga.us
6	Grace McElveen	(912) 334-0802	gmcelveen@doe.k12.ga.us
7	Jimmy Everson	(229) 723-2664	jeverson@doe.k12.ga.us

#### Title I, Part A Program Specialists' Contact Information



Area	Name	Office Telephone	Email
8	Marijo Pitts-Sheffield	(912) 269-1216	mpitts@doe.k12.ga.us
9	Kathy Pruett	(706) 540-8959	kpruett@doe.k12.ga.us
10	Elaine Dawsey	(478) 971-0114	edawsey@doe.k12.ga.us
11	Olufunke Osunkoya	(678) 704-3557	oosunkoya@doe.k12.ga.us
12	Bobby Trawick	(229) 246-1976	btrawick@doe.k12.ga.us
13	Ken Banter	(478) 960-2255	kbanter@doe.k12.ga.us
14	Tammy Wilkes	(478) 237-2873	twilkes@doe.k12.ga.us

#### Presenter



Richard Woods, Georgia's School Superintendent *"Educating Georgia's Future"* gadoe.org

#### Randy Phillips, Ed. D. Georgia Department of Education School Improvement – Federal Programs Title I Education Program Specialist <u>rphillips@doe.k12.ga.us</u> (770) 334-8390



# State Charter Schools Checkpoints for FY15

March 2015 GCEL Conference