

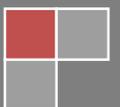
2013-2014

# South Carolina Public Charter School District

INTERNAL CONTROL  
POLICIES AND PROCEDURES FOR TITLE I



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## Introduction

**Definition of Internal Control:** Internal control is a process that is developed by the utility district to provide reasonable assurance that the following categories of objectives will be achieved:

- The utility district’s financial reporting will be reliable;
- The utility district will be operated effectively and efficiently; and
- The utility district will comply with applicable laws, regulations, contracts and grant agreements.

In an effort to support these requirements, the South Carolina Public Charter School District has developed Internal Guide with a resource of recommended fiscal policies and procedures for Title I funds.

### **Purpose**

The *Guide* can provide standards and directives for sound management and promote consistent, prudent financial and administrative practices. Also, it can provide guidance to the school in the application of various federal and South Carolina laws and regulations and the Department of Education’s requirements for the administration of grants and contracts awarded by the U.S. Government and other funding sources.

The *Guide* should be used in conjunction with and referenced to the Charter School’s existing personnel policy manual, job descriptions and other policy manuals maintained by the school.

### ***Amending the Guide***

This is a living document and will be updated on a regular basis as the South Carolina Public Charter School District receives further guidance from the United States Department of Education, Office of Federal Programs, South Carolina Department of Education, Office of State and Federal Accountability, results of court decisions, and changes in state statute. To ensure that you are referencing the most recent version of the policies and procedures, please check the “history” section below.

### **HISTORY:**

February 2013: document created March 05, 2014 Modified  
-Original text is black

For questions concerning this document or questions concerning the South Carolina Public Charter School District’s Student Services, please contact the Director of Student Services at 803-734-8067.

## Method of Allocation

### What are Title I Funds?

Title I, Part A of the Elementary and Secondary Education Act (ESEA), as amended, provides supplemental financial assistance to local educational agencies (LEAs) to improve the teaching and learning of children who are at risk of not meeting challenging academic standards and who reside in areas with high concentration of children from low-income families. LEAs allocate Title I funds to eligible school attendance areas based on the number of children from low-income families.

### How does the SCPCSD allocate Title I funds to schools?

To determine poverty counts for eligibility, South Carolina Public Charter School District (SCPCSD) uses the number of students who receive free and reduced-priced lunches in each school rather than census data and uses that measure consistently across the district to rank all school attendance areas according to the poverty percentage.

All areas at or above the poverty rate of 40% are eligible for assistance and to operate as a school wide program, but in compliance with the federal law, SCPCSD serves schools under these four categories (Fig.1). Each category has been allocated with per pupil per category amount.

(Fig.1)

CATEGORY	ALLOCATION PER PUPIL PER CATEGORY
75% and above	1649.33*
Virtual K-12 (45% or above)	277.75*
Elementary (45% or above)	684.93*
High School (45% or above)	432.28*

*\*Subject to change each year*

Per pupil per category amount will be determined by the SCPCSD. Per pupil per category amount may change each year. **The district will meet with Title I and Non-Title I Schools to discuss the PPA amounts.**

## 5<sup>th</sup> Day Count

The percentage of poverty figures are calculated in the Office of State and Federal Accountability using the March count of students participating in the free and reduced-priced lunch. This report is obtained from and verified by the Department of Child Nutrition. The 135-day Average Daily Membership report is obtained from and verified by the Power School Coordinator.

Most school district in the State base their 135 ADM for as their final count for Title 1 preliminary allocation for next school year.

Unlike other school districts, The South Carolina Public Charter School District uses the following to determine the Title I preliminary allocation:

- 135-day Average Daily Membership report from the schools that are currently operating and
- Anticipated enrollment and the expected free and reduced lunch counts from the schools that are expected to open for the next school year.

### **Why does SCPCSD uses 5<sup>th</sup> day count?**

SCPCSD had five charter schools open under its auspices in August 2008. In the 2009-10 school year seven schools operated in the district. An additional four schools opened in the district in 2010. At the start of the 2011-2012 school year, the district added two more schools. In the 2012-2013 school year, five more schools opened which brings the current total to eighteen public charter schools. By 2013-2014 school year, the district grew to 24 schools.

- \* Brick-and-Mortar: 17
- \* Virtual: 7

Considering the growth of the South Carolina Public Charter School District, and new schools opening each year, the SCPCSD does not base the 135 ADM as their official count as the schools planning to open for the next year does not have their actual student enrollment.

In agreement with the South Carolina State Department of Education, Office of Federal and State Accountability, the SCPCSD finalizes the Title 1 allocations based upon snapshot of 5<sup>th</sup> day.

5<sup>th</sup> day count is the official data pull for Title I funds. The 5<sup>th</sup> day pull must contain all the free and reduced lunch information you have collected to determine your poverty rate.

### **What is 5<sup>th</sup> day count?**

The South Carolina Public Charter school District official Title I allocations are based upon the schools official 5<sup>th</sup> day count obtained by PowerSchool. This report is run by the SCPCSD Director of Technology Services office.

- School PowerSchool personnel will be trained to enter the required information required for the free and reduced lunch counts.
- It is the schools responsibility to identify the free and reduced students based upon the lunch forms completed by the parent and mark them as such in PowerSchool.

- Schools Leaders and PowerSchool personnel will be reminded to enter the data into PowerSchool before running the reports.
- School allocations made based on the 5<sup>th</sup> day count are final for the school year. No changes will be made after the 5<sup>th</sup> day count report finalized by the SCPCSD Director of Director of Technology Services Office.

### **Explain 5<sup>th</sup> day count report?**

#### **5<sup>th</sup> Day Report**

The Number of students that are marked active/present on the 5<sup>th</sup> day of school from the first day of school. Based on the 5<sup>th</sup> day count, total number of students and number of free and reduced lunch status the district determines the poverty rate of that school.

Example: If the first day of school is 15<sup>th</sup> of August, then the 5<sup>th</sup> day of count (snapshot not ADM) is the 19<sup>th</sup> of August.

Note: The school has 10 school days after the 19<sup>th</sup> to make sure that all your student information is correct in PowerSchool.

The Poverty rate is based on the number of children the school has in PowerSchool as free and reduced lunch divided by the schools entire population.

Title I funds 5 to 17 year old only, both snapshot counts and lunch counts for students participating in the 4-year old child development program are disregarded from computations along with any free and reduced counts for EEI participants (students less than 5 years old).

The district then uses the formula to allocate the total funds received from the State to the eligible Title I schools.

## PowerSchool

Accurate and timely data reporting will be a very important component in the running and survival of schools. *The schools will be responsible for setting up their own email clients/servers.*

PowerSchool, a product of Pearson School Systems, is a comprehensive, integrated software system designed to manage a wide array of school and student information such as student demographics, attendance, discipline, grades, schedules, emergency contacts, and more. PowerSchool is the software system adopted by the South Carolina Department of Education for maintaining student information at both the school and district level, and is used by virtually every school district in the state. The state has some important keys days that they will pull information from 5<sup>th</sup>, 45<sup>th</sup>, 90<sup>th</sup>, 135<sup>th</sup>, and 180<sup>th</sup> day counts. You will need to insure that when these days come around the necessary data is in PowerSchool and accurate.

In addition to PowerSchool support, the Technology Services Department provides technology training opportunities. These opportunities include mandatory scheduled training both at the district level and at the schools that might be applicable to a particular project, or ongoing formal training. SCPCSD would advise having designated student data/enrollment personnel to spend most of their time entering data into PowerSchool and keeping the data up to date and accurate. The school need to understand the importance of data accuracy that most departments pull information from PowerSchool to also send to the state, such as Finance, Accountability, Title 1, Special Education, etc., And these departments are pulling information for funding purposes, testing material, textbooks, etc.

Schools are reminded that the Free and Reduced Lunch Status is an economic indicator for the student you are serving and does not indicate that the student is actually being served a meal. It is important that even if your school doesn't have a lunch program that they complete the eligibility form and return it to the school.

**ALL SCHOOLS SHOULD HAVE A PROCESS TO COLLECT COMPLETED LUCNH FORMS AND CODE THEM APPROPRIATELY IN POWERSCHOOL.**

Resources:

See **Appendix Q** at the end of this handbook

Schools can find the date collection schedule from the link below:

<http://ed.sc.gov/agency/ac/Data-Management-and-Analysis/Power-School-Administration/documents/20122013DataCollectionSchedule.pdf>

## District of Residence (DOR)

The State pulls the funding from the resident districts and fund it to the SCPCSD based upon the students included in the 5<sup>th</sup> day report and their district of residence information provided in PowerSchool.

As it is very important component schools need to pay more attention when entering the **District of Residence information**. The schools need to use the listed documents in Appendix E-2 to **determine the DOR**. The SCPCSD will verify the DOR information provided in PowerSchool at the beginning of the school year.

The screenshot shows the 'Edit Current Enrollment' form in PowerSchool. The form is titled 'Edit Current Enrollment' and includes a navigation breadcrumb: 'Start Page > Student Selection > Edit Current Enrollment'. The form is for a student with StateID '10' and State 'YPA'. The form fields are as follows:

Field	Value
Entry Date	8/23/2012 (MM/DD/YYYY) *
Entry Code	E (Eligible for State Funding) [dropdown]
Entry Comment (entry & exit)	[text area]
Exit Date	06/07/2013 (MM/DD/YYYY) *
Exit Code	[dropdown]
Exit Comment	[text area]
Full-Time Equivalency	Default [dropdown]
Grade Level	10 [dropdown]
Track	[checkbox] [dropdown]
District of Residence	School District One [dropdown]

Note: This screen may not be used to transfer a student in or out of school. Click on Functions to find links to those operations.

Resources:

See **Appendix E-1** at the end of this handbook

See **Appendix E-2** at the end of the handbook

## Timeline of Events

**April:** District requests schools to submit school calendars for the next school year

**May:** Schools submit the school board approved calendar to the district

**May:** Based upon the calendars submitted by the schools, the district creates the start date and end date for the schools in PowerSchool

**May:** District requests the schools to update the school calendar with the workday and holiday information

**May:** First day and last day of the school are established and approved by the school and the district

**May:** School Leader signs the assurance confirming the school calendar

Any request to change of school calendar dates should be approved by the school board and a request needs to be submitted to the SCPCSD in writing.

District will review the request and take action as needed

**June-August:** District will conduct a mandatory PowerSchool training and the school data persons will be trained to enter the free and reduced lunch counts as a part of the training

**June-August:** School Leaders and school PowerSchool personnel will be reminded via e-mail to enter the free and reduced lunch data along with the date the report will be pulled

The school has 10 school days after their 5<sup>th</sup> day of school to make sure that all your student information is correct in PowerSchool.

SCPCSD Director of Technology Services will run the 5<sup>th</sup> day count report.

Director of Student Services and Coordinator of Student Services will review the 5<sup>th</sup> day count report.

School allocations made based on the 5<sup>th</sup> day count are final for the school year. No changes will be made after the 5<sup>th</sup> day count report finalized by the SCPCSD Director of Technology Services Office.

Source documents and final school selection forms are initialed or signed by all personnel responsible.

The district then uses the formula to allocate the total funds received from the State to the eligible Title I schools.

## **Private School Consultation**

The South Carolina Public Charter School District is a district of choice and is not a district of residence for any child, therefore there are no parentally placed private schools or home schooled children who reside in our district.

### **SC Code of Law**

#### **SECTION 59-40-65**

(F) Only students enrolled in the charter school as a full-time student shall be reported in the charter school's average daily membership to the State Department of Education for the purposes of receiving state or federal funds. Private and homeschool students may not be included in the student weighted pupil units or average daily membership reported to the State Department of Education for the purposes of receiving state or federal funds.

## District Set asides

District set-asides are District level reservations from the current year allocation prior to distributing funds to schools via per-pupil amounts following poverty ranking rules. South Carolina Public Charter School District required reservations include:

<b>Required Title 1 Set-Asides</b>
Parent Involvement 1% of minimum allocation
Homeless
Supplementary Educational Services (SES)
<b>Allowable Non-Required Title 1 Set-Asides</b> (PPA Consideration Not Required)
Administration District Level staff, district level supplies, district level equipment, travel, etc.

## **Developing your Schools Title I Plan**

### **Purpose of Title I Funds**

The purpose of Title I, Part A of Public Law 107-110 is to enable schools to provide opportunities for children served to acquire the knowledge and skills contained in the challenging state content standards and to meet the challenging state performance standards developed for all children.

### **This purpose is accomplished by such efforts as**

- Providing an enriched and accelerated educational program;
- Promoting schoolwide reform through schoolwide programs or through additional services that increase the amount and quality of instructional time;
- Significantly upgrading the quality of instruction by providing staff in participating schools with substantial opportunities for professional development; and
- Affording parents meaningful opportunities to participate in the education of their children at home and at school.

### **Planning**

The school should select a school planning teams consisting of the following members:

- School staff,
- Administrators,
- Parents,
- Community members,
- Technical assistance providers,
- and, at the high school level, students.

All academic activities in the Title I plan must be supported through research and included in the school renewal plan.

### Timelines for Title I Process

**Funding Period:** South Carolina Public Charter School District Budget Year is from July to June in order for us to accrue receivables

Month of April-August*	District Title I and Finance Department will provide Mandatory training to new schools (optional to schools which are open) on developing Title I plans, time lines, accountability and finance issues.
After the SCPCSD 5 <sup>th</sup> day report	District will notify the schools after the 5 <sup>th</sup> day report if they are eligible to operate a school wide Title I Program.
Within 10 days of the 5 <sup>th</sup> day report	Newly identified Title I school will conduct their planning meeting.
Within 30 days of 5 <sup>th</sup> day report	Submit the Draft Title I plan to the District on the State website
Within 5 days of draft Title I Plan submission	Plans will be e-mailed to schools with comments/suggestions
Within 5 days of district feedback	Schools will submit the updated Title I plans on the State website.
	District will review if any components are missing from the Title I plan and request schools to update them needed.
November*	District will submit the Final Title I plan to the SC Department of Federal and State Accountability.
November-December*	State will approve the Title I Plan
Once the final Title I plan is submitted to the SC Department of Federal and State accountability, the schools <u>will not</u> be allowed to make any changes to the plan. Any such changes will be replaced by the earlier approved draft Title I plan by the District Title I coordinator.	
<b>Time period when the schools can request for any changes in their school Title I Plans**</b>	

December-June	District will review schools Title I plans and monitor the spending and advice the schools as needed.**
*Subjected to Change but the schools will be notified via E-mail.	
**Title I, Part A of the Elementary and Secondary Education Act (ESEA) limits local education agencies (LEAs) to carry over no more than 15% of the current year grant allocation.	

## Supplement not Supplant

### SUPPLEMENT NOT SUPPLANT Rules for ESEA Programs

#### GENERAL BACKGROUND

The “supplement, not supplant” requirement ensures that children participating in Title programs receive their fair share of services from state and local funds. Section 1120A(b) of the statute requires that the SEA and LEA use federal funds received under Title I only to supplement the amount of funds available from non-federal sources for the education of students participating in Title I. The LEA cannot use these federal funds to supplant (take the place of) funds that would, in the absence of Title I funds, have been spent on Title I students.

Federal funds cannot be used to pay for services, staff, programs, or materials that would otherwise be paid with state or local funds.

In a Targeted Assistance (TAS) school, students are selected based on academic need to receive Title I services. While schools are not required to provide Title I services using a particular instructional method or in a particular instructional setting, the services supported by Title I must supplement the educational services that would be provided to students in the absence of Title I.

In a Schoolwide Program (SWP) school, schools must use Title I funds only to supplement the amount of funds that would, in the absence of Title I funds, be made available from non-federal sources for that school. Schoolwide programs do **not** have to select a target population for additional services or separately track federal program funds at the school level.

#### PRESUMPTION OF SUPPLANTING

According to OMB Circular A-133, Compliance Supplement, Section III G. 2.2, there are three flags in “supplement, not supplant” where there is a presumption of supplanting.

#### Supplanting has likely occurred if:

- 1) Title I funds are used to provide services that are **required** to be made available **under other federal, state, or local laws** (e.g., Title I funds cannot be used take the place of services required for students with disabilities or limited English proficient students. Title I funds may be used to coordinate or supplement those services, but not supplant them.).
- 2) Title I funds are used to provide services that were **provided with nonfederal funds in the prior year**.
- 3) Title I funds are used to provide services to Title I eligible students while those same services are **provided to non-Title I students with non-federal funds** (e.g., pay for full-day kindergarten with Title I funds in Title I schools while providing full-day kindergarten in non-Title I schools with other state and local funds).

## **Allowable and Non-Allowable**

Federal law directs that Title I funds are to be used for the purpose of student achievement, staff development and to build parent capacity to better support their child's educational attainment.

The South Carolina Public Charter School District follows expenditure guidelines for federal programs as set forth in OMB Circular A-87. It adheres to a standard that all expenditures charged to federal grants must be reasonable, ordinary and necessary in order for a cost to be reimbursed. Some purposes not reimbursable with federal funding may be supported with other local or school resources. In all instances, whether or not a specific expenditure is allowable under a grant, district policies must be followed.

The attached chart provides a partial listing of expenditure purposes to provide guidance in the past under Title I guidelines.

If you are unsure if a proposed expenditure meets guidelines, please contact **Vamshi Rudrapati** in the Title I Office at **803-734-1105** or **Tasha Robinson** in the Finance Department at **803-734-8017** for additional assistance.

Resources:

See **Appendix D** at the end of this handbook

## Comparability

Comparability is a **test of fairness**. Schools receiving federal Title I funds must receive state and local funds **comparable** to the state and local funds given to non-Title I schools. In other words, Title I schools must be getting their fair share of state and local funds before they receive Title I funds. Title I funds, by law, are therefore **supplemental** to state and local funds.

### Frequency for comparability testing

Comparability must be tested **every year** in which a district receives Title I funds.

### Timeframe (THIS IS IMPORTANT)

Comparability testing should be completed at the district level by **November 15**. To submit this report to the State, the deadline for schools to submit this report is **November 10** each school year. This will give the school time to fix any comparability issues before the second half of the school year. A school should have corrected any comparability issues no later than **January 10**.

## **Maintenance of Effort (MOE)**

To ensure that Title I, Part A funds are used to provide services that are in addition to the regular services normally provided by an LEA for participating children, three fiscal requirements related to the expenditure of regular State and local funds must be met by the LEA. An LEA must:

- (1) Maintain State and local effort;
- (2) Provide services in project areas with State and local funds that are at least comparable to services provided in areas not receiving Part A services; and
- (3) Use Part A funds to supplement, not supplant regular non-Federal funds.

MOE is an annual calculation of the combined fiscal effort (per pupil or the aggregate expenditures) of a school district. The annual calculation is used for the comparison of two fiscal years to determine if the district has provided the effort necessary with state and local funds for a free public education. Fiscal effort that meets federal requirements must be maintained in order for the district to receive Title I funds.

To ensure the district's fiscal effort is maintained, a worksheet must be completed for each of the two years in the comparison. The school district's annual Audit Report is the source data for each of the two years. The business office of the school district may archive the necessary Audit Reports for this procedure. The sum of the calculated MOE for each of the two comparison years (preceding and second preceding) must be noted on page one of the school district's application for Title I funds. Refer to Federal Guidance for Fiscal Issues for additional information and examples

## Carryover

Under section 421(b) of the General Education Provisions Act (GEPA), LEAs and SEAs must obligate funds during the 27 months extending from July 1 of the fiscal year for which the funds were appropriated through September 30 of the second succeeding fiscal year. This maximum period includes a 15-month period of initial availability plus a 12-month period for carryover.

However, section 1127(a) of Title I of the ESEA limits the amount of Title I, Part A funds an LEA may carry over from one fiscal year's allocation to not more than 15 percent of the total Title I, Part A funds allocated to the LEA for that fiscal year.

The following example illustrates how the 27-month availability for Title I, Part A funds and the carryover limitation would operate for an LEA that receives an allocation under the FY 2005 appropriation.

### Federal FY 2005 Appropriation

<b>(Title I, Part A Funds Allocated to the LEA from Funds Made Available on July 1, 2005 Total \$1,500,000) Total allocation</b>	\$1,500,000
Minimum amount LEA must obligate between July 1, 2005 – September 30, 2006 to avoid excess carryover (85 percent of total appropriation)	1,275,000
Amount LEA may carryover and obligate during October 1, 2006 – September 30, 2007 (carryover period provided under section 421(b) of GEPA)	225,000

## Who is Homeless?

(McKinney-Vento Homeless Assistance Act of 2001 – Title X, Part C of the No Child Left Behind Act – Sec 725)

The term “homeless children and youth”—

- A. means individuals who lack a fixed, regular, and adequate nighttime residence...; and
- B. includes —
  - Children and youths who are sharing the housing of other persons due to loss of housing, economic hardship, or similar reason; are living in motels, hotels, trailer parks, or camping grounds due to the lack of alternative accommodations; are living in emergency or transitional shelters; are abandoned in hospitals; or are awaiting foster care placement;
  - Children and youths who have a primary nighttime residence that is a public or private place not designed for or ordinarily used as a regular sleeping accommodation for human beings...
  - Children and youths who are living in cars, parks, public spaces, abandoned buildings, substandard housing, bus or train stations, or similar settings; and
  - Migratory children who qualify as homeless for the purposes of this subtitle because the children are living in circumstances described in clauses (i) through (iii).

*The McKinney-Vento Homeless Assistance Act (Subtitle B— Education for Homeless Children and Youth), reauthorized in January 2002, ensures educational rights and protections for children and youth experiencing homelessness. This brief explains how the McKinney-Vento Act intersects with Title I, Part A, of the No Child Left Behind Act (NCLB) and offers strategies for effective collaboration. Briefs on additional topics pertaining to homeless education and related laws may be found at [www.serve.org/nche/briefs.php](http://www.serve.org/nche/briefs.php).*

Homeless students are part of Title I, Part A’s target population of disadvantaged students; however, the high mobility, trauma, and poverty associated with homelessness create unique educational barriers and challenges that non-homeless Title I students may not face. Homelessness is associated with lower standardized test scores<sup>1</sup> and a higher likelihood of missing school and/or experiencing multiple school transfers.<sup>2</sup> Thus; homeless students often require additional supports for academic achievement and success on state assessments.

Many challenges faced by homeless students are addressed within the McKinney-Vento Homeless Assistance Act; however, Title I, Part A, is also in the position to play a significant role in the academic achievement of homeless children and youth. For this reason, Congress included specific provisions related to students experiencing homelessness within Title I, Part A.

**Automatic Eligibility:** Children and youth who are homeless are automatically eligible for Title I, Part A, services, whether or not they attend a Title I school or meet the academic standards required of other children for eligibility.<sup>3</sup> This automatic eligibility acknowledges that the experience of homelessness puts children at significant risk of academic failure, regardless of their previous academic standing.

## Serving Homeless Students in Title I Schools

Homeless students who attend Title I schoolwide or targeted assistance schools may have unique challenges that are not addressed by the regular Title I program at these schools. These challenges may create barriers to full participation in Title I programs and defeat the overarching program goal of helping all students meet challenging state standards. For instance, students residing in shelters, motels, or other overcrowded conditions may not have a quiet place to study at the end of the day and may require extended after-school library time; or, a student who is dealing with the stress and anxiety associated with homelessness may not be able to focus on his or her studies and may benefit from school counseling services. Through Title I, Part A, or Title I, Part A, in conjunction with a McKinney-Vento subgrant, homeless students can take part in services that enable them to benefit more from a school's Title I program.

**Schoolwide Programs:** Schoolwide Title I schools are required to do a needs assessment and develop strategies to address the needs of *all* children in the school. [20 USC 6314(b)(1)]- 3 - Subpopulations of children, such as homeless students, who attend these schools should have their unique needs addressed within schoolwide programs designed for all students.

**Targeted Assistance Schools:** Targeted assistance schools are charged with using their programming resources to help participating children meet academic achievement standards. These schools must provide services to children who have the greatest need for special assistance.

The No Child Left Behind Act specifically notes that homeless children are included within the population of those designated with greatest needs. [20 USC 6315(b)] Because they frequently experience educational challenges related to mobility, family disruption, and poverty, homeless students may require additional programming.

## Suggestions for Services

After assessing the needs of homeless students, the homeless education program and Title I program staff, along with other district-level administrators, may consider funding the following:

- Before-school, after-school, and/or summer programs with an educational focus
- Outreach services to students living in shelters, motels, and other temporary residences to help identify homeless children and youth and advise them of available school programming
- Basic needs such as school uniforms, school supplies, and health-related needs
- Counseling services
- Teachers, aides, and tutors to provide supplemental instruction to students whose achievement is below grade level
- Parental involvement programs that make a special effort to reach out to parents in homeless situations
- Research-based programs that benefit highly mobile students
- Data collection to assess the needs and progress of homeless and other highly mobile students

Schools may not require verification or proof of residency as a condition of enrollment.

42 U.S.C. §11432(g)(3)(C). However, the Act does not prohibit schools from requiring parents, guardians, or youths to submit emergency contact information. 42 U.S.C. §11432(g)(3)(H); 20 U.S.C. §1232g.

**Attendance Guidance:** The McKinney-Vento Act requires schools to identify and remove all barriers to enrollment and retention in school for children and youth in homeless situations.

*42 U.S.C. §§11432(g)(1)(I), (g)(7). Zero tolerance rules for absenteeism can be such barriers, particularly when they result in class failures, exclusion from school, or court involvement. Frequently, students in homeless situations will miss school due to their living situations. Absences caused by homelessness must not be counted against students, as this would create a barrier to enrollment and retention in school.*

Once the student is identified as homeless, you need to determine the BARRIER for the student to access education (transportation, computer etc...). Once you determine the barriers, please contact the SCPCSD Homeless coordinator to discuss on providing comparable educational opportunities for the student in such circumstances.

## **The Migrant Education Program (MEP)**

The Migrant Education Program (MEP) is authorized by Part C of Title I of the Elementary and Secondary Education Act of 1965, as amended (ESEA). The MEP provides formula grants to State educational agencies (SEAs) to establish and improve education programs for migratory children. These grants assist States in improving educational opportunities for migratory children to help them succeed in the regular school program, meet the same State academic content and student academic achievement standards that all children are expected to meet, and graduate from high school.

### **STATUTORY PURPOSE OF THE PROGRAM**

The general purpose of the MEP is to ensure that migratory children fully benefit from the same free public education provided to other children. To achieve this purpose, the MEP helps SEAs and local operating agencies address the special educational needs of migratory children to better enable migratory children to succeed academically. More specifically, the purposes of the MEP are to:

- Support high-quality and comprehensive educational programs for migratory children in order to reduce the educational disruption and other problems that result from repeated moves;
- Ensure that migratory children who move among the States are not penalized in any manner by disparities among the States in curriculum, graduation requirements, and State academic content and student academic achievement standards;
- Ensure that migratory children are provided with appropriate educational services (including supportive services) that address their special needs in a coordinated and efficient manner;
- Ensure that migratory children receive full and appropriate opportunities to meet the same challenging State academic content and student academic achievement standards that all children are expected to meet;
- Design programs to help migratory children overcome educational disruption, cultural and language barriers, social isolation, various health-related problems, and other factors that inhibit their ability to do well in school, and to prepare them to make a successful transition to postsecondary education or employment; and
- Ensure that migratory children benefit from State and local systemic reforms.

**Things to consider:**

In planning a school wide Title I program, a school must take the needs of migrant children into account.

- If migrant children are to be part of the schoolwide program, the school should involve migrant parents in planning the program to ensure that the school effectively identifies and addresses the children's special educational needs. In addition, if the school intends to combine MEP funds in the schoolwide program, it must first meet the special educational needs of migrant children in consultation with migrant parents.
- Section 1306(b)(4) of the statute and sections 200.29(c)(1) and 200.86 of the regulations require schools to first use the MEP funds, in consultation with migrant parents, to meet the special educational needs of migrant children before they may combine MEP funds in a schoolwide program.
- The special education needs of the migrant children are: 1) the unique needs that result from the effects of their migratory lifestyle, and 2) those other needs that are necessary to permit these students to participate effectively in school. The school also must document that these needs have been met before it may combine MEP funds in a schoolwide program.
- The SEA provides guidance to schools regarding when it is appropriate to combine funds in a schoolwide program. The school, in consultation with migrant parents, determines whether it may combine MEP funds in a schoolwide program, subject to guidance from the SEA.

Resources: <http://www.ed.sc.gov/agency/programs-services/88/>

## Supervision and Monitoring

Federal law requires the state Title I office to monitor Title I programs to ensure compliance with procedures and regulations each year. Department of South Carolina State and Federal Accountability has conducted their last Title I Audit in 2011-2012 school year.

South Carolina Public Charter School District provides supervision and conduct regular monitoring to all the Title I schools in the district.

### **Purpose of Monitoring:**

- **Compliance** - It's the law.  
Monitoring federal programs helps ensure that all children have a fair, equal, and significant opportunity to obtain a high-quality education. Compliance monitoring is intended to be a collaborative partnership between the District and the schools to ensure compliance with the Elementary and Secondary Education Act.
- **Technical Assistance** - We're here to help.  
Monitoring team members provide technical assistance during the review visit and beyond. It is not the District's intent to tell the LEA HOW to run its title programs, but rather to answer questions, facilitate dialogue, and exchange ideas and information for program improvement while, at the same time, meeting all federal requirements.

Monitoring will consist of documentation reviews, on-site observations of services with students, and interviews with school staff. SCPCSD Student Services Staff, and or assigned monitors, will conduct the monitoring visit.

**Site visits may be announced/scheduled or unannounced.**

Resources:

See **Appendix T-X** for District Monitoring Tools.

Meeting planning documents requirements (in other words, writing the plan) is not as important as the monitoring, implementation, and execution of the plan. ~ Reeves, 2006

## Supervision and Monitoring Guidelines for Title I Funds

This guidance is to assist schools in insuring that purchases comply with federal, state, and district guidelines. The requirements listed represent solutions for those areas that have been the most misunderstood. Additional guidance may be issued by e-mail as more information is available.

**Funds from one fiscal year may not be used to purchase items that will only be used during the next fiscal year.**

## Verification of Lunch Counts

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The South Carolina Public Charter school District official Title I allocations are based upon the schools official 5<sup>th</sup> day count obtained by PowerSchool.

- It is the schools responsibility to identify the free and reduced students based upon the lunch forms completed by the parent and mark them as such in PowerSchool.
- If the school does not provide lunch at school, the schools will use **Education Improvement Act Eligibility Information form** to identify the free and reduced students.

### Monitoring Guidelines:

- SCPCSD will randomly choose students and verify their lunch status with the data entered in PowerSchool using the already uploaded school lunch forms from **Epicenter**.
- If SCPCSD suspects that the lunch data entered into PowerSchool is incorrect, the SCPCSD will conduct a full on-site review of all the lunch forms. This may be conducted at the District office or at the school.
- Please see **Appendix E-1** for Lunch Count Verification Form

## Equipment Guideline for Title I

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### Definition of Equipment

For the purposes of this document, The South Carolina Public Charter School District defines a fixed asset as equipment (purchased with Federal funds: IDEA, Title I, Perkins) as real property costing \$500 or more (and **all** computers, laptops, tablets, printers, monitors, and workstations) and has a useful life of more than one year. A fixed asset is property that is governed by audit requirements associated with control, accounting, and disposal.

### Allowable Equipment

Once approved, the school may purchase or lease equipment with Federal funds if 1) it is reasonable and necessary to operate its federal programs effectively, 2) existing equipment will not be sufficient, and 3) the costs are reasonable.

## Guidelines for Equipment

Purchasing – No school-level equipment purchased with Federal funds may be purchased without written approval from the Director of Student Services. Equipment purchased with Federal funds will not be approved for reimbursement without prior approval from the District. Equipment purchased by IDEA must be written into the District IDEA application. Equipment purchased by Title I must be written into the school’s Title I plan.

Once approved, the school may purchase the specific piece of equipment. Once received, within thirty days, the school will submit to the Director of Federal Programs, [Federal Asset Reporting Form](#) and a copy the invoice (if purchased through a vendor) and copy of receipt. The district will assign a Federal Programs Asset Number and return to the school a copy of the [Federal Asset Reporting Form](#) (for school records) with a fixed-asset tag. The tag must be placed in a conspicuous location on the specific piece of equipment.

At any time throughout the year, if there are fixed assets that need to be disposed of (broken or stolen), please complete a [Fixed Asset Disposal Form](#) and send it to the Director of Federal Programs.

All correspondence and/or questions regarding Fixed Assets for Federal Programs should be directed to **Robert Compton** at 803-734-8067 or [rcompton@sccharter.org](mailto:rcompton@sccharter.org).

## Time and Effort/Personnel Activity Report

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The federal law requires all employees, including teachers, paraprofessionals, and other staff that are paid with federal funds to document the time and effort they spend within that program. The portion of the federally paid salary should be reflective of the time and effort the individual has put forth for that federal program.

### What is a “cost objective”?

A particular set of work activities for which cost data is accumulated.

### Single cost objective (Semi Annual Certification): Appendix-H

Schools that have fully funded federal personnel must also maintain an assurance every six months (at a minimum) documenting that staff have worked solely for the one particular federal program. The individual and their supervisor must both sign the assurance after the time has occurred. This certification should also include documentation of time spent on the federal program (copy of daily planner, schedules, time sheets, daily logs, etc.).

### Multiple cost objectives: Appendix-I

If the employee is paid from two or more funding sources but has a fixed schedule for his/her Title I activities. (a schedule needs to be provided)

### Time and Effort without Fixed schedule: Appendix-J

Staff paid with Title I funds on an irregular schedule must keep a time and effort log and time sheet which must be signed every month.

When addressing this requirement, please keep documentation that outlines how the time and effort requirements are met for all staff being paid with federal funds either using a time documentation schedule or time and effort log. All positions will need to maintain an assurance of time.

Assurances, certifications, time and effort logs, and schedules should be uploaded to Epi center as scheduled.

## Para professional/teacher assistant

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**WHO ARE PARA PROFESSIONALS?** “Paraprofessionals who provide instructional support,” includes those who

- provide one-on-one tutoring if such tutoring is scheduled at a time when a student would not otherwise receive instruction from a teacher,
- assist with classroom management, such as by organizing instructional materials,
- provide instructional assistance in a computer laboratory,
- conduct parental involvement activities,
- provide instructional support in a library or media center,
- act as a translator, or
- provide instructional support services under the direct supervision of a highly qualified teacher. *[Title I, Section 1119(g)(2)]*

### Documentation that the Paraprofessional is qualified

- All Title I paraprofessionals must have a secondary school diploma or its recognized equivalent.
- Additionally, except as noted below, paraprofessionals hired after January 8, 2002, and working in a program supported with Title I, Part A funds must have—
- Completed two years of study at an institution of higher education; or
- Obtained an associate’s (or higher) degree; or
- Met a rigorous standard of quality and be able to demonstrate, through a formal State or local academic assessment, knowledge of and the ability to assist in instructing, reading, writing, and mathematics (or, as appropriate, reading readiness, writing readiness, and mathematics readiness).

## Travel-Per Diem Rates

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The school needs to use federal funds only to pay per diem amount as listed on the GSA website. The additional amount can be paid using general funds. The Federal lodging rates are found at <http://www.gsa.gov>.

## Additional Guidelines

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### **Title 1 Planning Meeting: Appendix-C-1**

The school should select a school planning teams consisting of the following members:

- School staff,
- Administrators,
- Parents,
- Community members,
- Technical assistance providers,
- and, at the high school level, students.

The team will meet before the end of school year plan to develop their school Title I Plan based on the needs of the schools. The school should consider strategies that could close the achievement gaps at the school.

### **Title 1 Annual Meeting: Appendix-C-2**

One requirement of the Elementary and Secondary Education Act (ESEA) is the Title I Annual Parent Meeting. Each year, schools receiving Title I, Part A funds are required to host a meeting for parents to explain the Title I program and how parents can be involved. At this meeting, the following issues must be addressed:

- Explain whether the school participates in a schoolwide or targeted assistance program.
- Explain the requirements of a schoolwide or targeted assistance program.
- Explain what participation in Title I means for the school and include-
  - \* A description and explanation of the school's curriculum.
  - \* Information on the forms of academic assessment used to measure student progress.
  - \* Information on the proficiency levels students are expected to meet.
- Explain the district Parental Involvement Policy, the school Parental Involvement Policy, and the school School-Parent Compact. (Note that each Title I school must have a **site specific** Parental Involvement Policy and School-Parent Compact. This is not the same as the district Parental Involvement Policy.)
- Explain the rights of parents to be involved in the school's programs and provide ways to do so.
- Explain that parents have the right to request opportunities for regular meetings for parents to formulate suggestions and to participate, as appropriate, in decisions about the education of their children.

In order to keep parents informed, schools must invite to this meeting all parents of children participating in Title I, Part A programs. In a schoolwide school, all parents would be invited to attend, and in a targeted assistance school, parents of children receiving Title I services would be invited. Schools must also offer a flexible number of additional meetings, such as in the morning or evening so that as many parents as possible can attend.

**Principal Attestation Letter: Appendix-K**

The Elementary and Secondary Education Act (ESEA) No Child Left Behind Act of 2001, states in ESEA Section 1119(i) that each local educational agency shall require that the principal of each school operating a Title I program under ESEA Section 1114 (School wide) attest annually in writing as to whether such school is in compliance with the requirements of Section 1119.

**HQ Letter (Four Week Rule) Appendix-L**

If a student in a Title I school is being instructed -- for longer than four weeks -- by a teacher/substitute teacher who does not meet the HQ requirements, a letter informing students' parents of this information must be sent, in a timely manner. This sanction applies to core content teachers in all Title I schools.

**Parent Right to Know: Appendix-M**

At the beginning of each school year, a local educational agency that receives funds under this part shall notify the parents of each student attending any school receiving funds under this part that the parents may request, and the agency will provide the parents on request (and in a timely manner), information regarding the professional qualifications of the student's classroom teacher.

**Parent Involvement Policy: Appendix-N**

Title I Parent Involvement requires each Title I school to develop a written parental involvement policy that describes the means for carrying out the requirements of Section 1118. The School must ensure that information related to school and parent programs, meetings and other activities are sent to the parents of Title I children in a format and in a language the parents can understand.

**School Parent Compact: Appendix-O**

The school-parent compact is a written agreement between teachers and parents. It is a document that clarifies what families and schools can do to help children reach high academic standards. Every school receiving Title I funds must develop a compact. The compact serves as a clear reminder of everybody's responsibility to take action at school and at home so that children can learn what is required of them. It is a written commitment indicating how all members of a school community -- parents, teachers, principals, students, and concerned community members -- agree to share responsibility for student learning.

A School Parent Compact must include:

1. Parent-teacher conferences
2. Frequent reports to parents on their child's progress
3. Reasonable access to staff
4. Opportunities to volunteer

**Note: Parent Compact need not be signed.**

A Title I Checklist for Monitoring Visit will be provided to all the Title I schools at the beginning of the school year to plan their timelines to submit their documentation to the District through Epi Center.

Schools should retain a copy of all the documentation submitted into Epi Center. SCPCSD auditing requirements necessitate the availability of all documentation for Title I Funds for 5 years.

## Records

**NOTE:** *ALL* school and student records that are documented as listed in Appendix P, Appendix T-X should be retained **for 3 years**. The records are confidential, legal documents and must be available to local and USED Federal auditors, parents, students and SCDE.

## Misuse of Title I Funds

Federal grant funds are awarded for a specific “public purpose” and grantees must use those funds as agreed and within certain parameters including the Office of Management and Budget Circulars and granting agency guidelines.

- Unfortunately, fraud, waste and misuse of these funds can and does occur. These issues can range from poorly managed programs to the extremes of intentional criminal fraud schemes.
- The consequences of grant fraud can include debarment from receiving future funding, administrative recoveries of funds, civil law suits and criminal prosecution—or a combination of all or some of these remedies.
- The best strategy to mitigate these risks is to increase awareness of the common grant fraud schemes and encourage appropriate risk management efforts to prevent issues or detect them as early as possible so grant funded programs have every chance of success and taxpayer funds are used as efficiently and effectively as possible.

## Grant Fraud Statutes

Federal grant dollars are susceptible to several forms of financial theft, most commonly in the form of specific federal violations, including:

- Embezzlement
- Theft or Bribery concerning programs receiving Federal funds
- False Statements
- False Claims
- Mail Fraud and Wire Fraud

Each of these violations of law are subject to criminal prosecution, fines, restitution, and civil penalties.

***The Recovery Act states, “every taxpayer dollar spent on our economic recovery must be subject to unprecedented levels of transparency and accountability.”***

Indicators of Fraud, Waste & Misuse of grant funds can be due to a variety of causes and are rarely a simple “Black and White” issue— we must follow-up on all such concerns.



### **Common Grant Fraud Scenarios**

Grant fraud occurs in many ways, but some of the most common fraud scenarios include:

- Charging personal expenses as business expenses against the grant.
- Charging for costs which have not been incurred or are not attributable to the grant.
- Charging for inflated labor costs or hours, or categories of labor which have not been incurred (for example, fictitious employees, contractors, or consultants).

### **Ways to Mitigate the Risks**

- Examine your operations to determine your fraud vulnerabilities.
- Implement specific fraud prevention strategies including educating others about the risks—the more people are aware of the issues, the more they can help prevent problems or detect them as early as possible.
- Establish an adequate and effective system of accounting, internal controls, records control, and records retention.
- Ensure all financial or other certifications and progress reports are adequately supported with appropriate documentation and evidence.
- Identify any potential conflicts of interest issues and disclose them to the granting agency for specific guidance and advice.
- Follow a fair and transparent procurement process especially when utilizing consultants. Ensure the rate of pay is reasonable and justifiable and that the work product is well-defined and documented.

## SCPCSD Compliance Monitoring

The South Carolina Public Charter School District (SCPCSD) has strict policies in place to detect fraud and the misuse of federal and state funds. For Title I purposes, the SCPCSD monitors the use of Title I funds via:

- SCPCSD supervision and monitoring of the Title I program;
- Follow up on any complaints concerning Title I funds or activities that the SCPCSD receives from school personnel, parents, and community members;
- Findings from the South Carolina State and Federal Accountability Audit; and
- Other reliable sources of information.

The SCPCSD has created a monitoring and accountability framework that is led by the Director of Compliance, Dana C. Reed.

As a charter school sponsor/authorizer, the SCPCSD has the following responsibilities as outlined in state law:

- Monitor the performance and legal/fiscal compliance of each charter school;
- Conduct or require oversight activities including conducting appropriate inquiries and investigations only if such activities are consistent with the law and do not unduly inhibit the autonomy granted to charter schools;
- Notify the charter school of perceived problems if the school's performance or legal compliance appears to be unsatisfactory;
- Take appropriate corrective actions or exercise sanctions short of revocation including requiring a school to develop a corrective action plan w/in a specified timeframe; and
- Determine whether each school's charter merits renewal, nonrenewal, or revocation.

As a charter school sponsor/authorizer, the SCPCSD must revoke or not renew a charter if it determines that a charter school committed a material violation of the conditions, standards, or procedures provided for in the charter; failed to meet or make reasonable progress toward achievement standards identified in the charter, failed to meet generally accepted standards of fiscal management; or, violated any provision of law from which the charter school was not specifically exempted.

### Monitoring Framework

- Rigorous
- Multi-dimensional
- 3 major components: charter school self-study, assessment of the school's performance in key indicator areas; and an on-site visit when a school's performance is unsatisfactory or renewal is at hand
- 4 key indicator areas: academic performance, compliance (charter and legal), finance, and operations (including data reporting and governance)
- Year in Review (based on school's self-study and school's performance in the 4 key indicator areas) in the form of a school performance scorecard

**School Performance Scorecard (SPS)**

- An annual report the SCPCSD issues to each of its schools
- A summary of the school’s performance and compliance to date
- Identifies the school’s areas of strengths and areas needing improvement
- Based on a school’s self-study and performance in the 4 key indicator areas of academic performance, compliance, finance, and operations

**Compliance Ladder**

- South Carolina Charter school law is very specific as to the grounds by which charters may be revoked or not renewed
- SCPCSD needed to adopt procedures to ensure compliance short of revocation or nonrenewal – SCPCSD did this in January 2012 via a compliance ladder
- The compliance ladder is a 3-tier approach with graduated notices/warnings: Caution, Probation, and Revocation
- SCPCSD addresses noncompliance throughout the calendar year as concerns/deficiencies are identified
- Each tier triggers a specific notice to a school and requires the school to take corrective action

Resources:

Performance Indicator Review (PIR).....**Appendix R**

School Performance Scorecard.....**Appendix S**

## Appendix

Appendix –A	<a href="#">Draft Title I Plan/ Title I Amendment/ Budget Plan/Time and Effort</a>
Appendix –B	<a href="#">Budget Cheat Codes</a>
Appendix –C-1	<a href="#">Planning Meeting Guidelines</a>
Appendix-C-2	<a href="#">Difference between Planning Meeting and Annual Meeting</a>
Appendix -D	<a href="#">Reference Guide for Allowable-Non-Allowable Allowable Title I Parenting Expenditures</a>
Appendix –E-1	<a href="#">Lunch Count Verification Form</a>
Appendix –E-2	<a href="#">Proof of Address Requirements</a>
Appendix –F-1	<a href="#">Federal Asset Reporting Form</a> <i>Online Survey-New</i>
Appendix –F-2	<a href="#">Fixed Asset Reporting/Inventory</a>
Appendix -G	<a href="#">Fixed Asset Disposal Form</a> <i>Online Survey-New</i>
Appendix -H	<a href="#">Semi Annual Certification Sample</a>
Appendix -I	<a href="#">Multiple Cost Objectives Sample</a>
Appendix -J	<a href="#">Time and Effort Certification Sample</a>
Appendix -K	<a href="#">Principal Attestation Letter</a>
Appendix -L	<a href="#">HQ Letter</a>
Appendix -M	<a href="#">Parent Right to Know</a>
Appendix -N	<a href="#">Parent Involvement Policy</a>
Appendix -O	<a href="#">School Parent Compact</a>
Appendix -P	<a href="#">Title 1 Checklist for Monitoring Visit</a>
Appendix -Q	<a href="#">5th Day Check Off List</a>
Appendix –R	<a href="#">Performance Indicator Review (PIR)</a>
Appendix -S	<a href="#">School Performance Scorecard</a>
Appendix-T	<a href="#">School Wide Program Monitoring Tool</a>
Appendix-U	<a href="#">Equipment Inventory Control Tracking Monitoring Form</a>
Appendix-V	<a href="#">Parental Involvement Monitoring Form</a>
Appendix-W	<a href="#">Supportive Services Monitoring Form</a>
Appendix-X	<a href="#">Graduation Rate Monitoring Form</a>