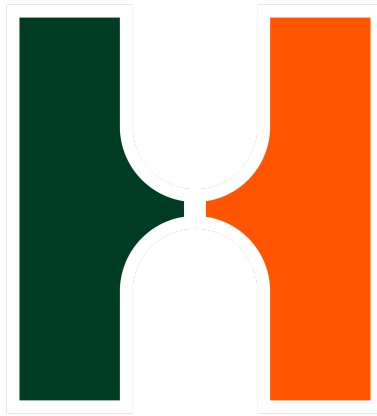


Hart County Schools Title I Procedures



Mission

Working together to provide all students with a quality education that prepares them to be successful citizens.

Creating the future together...one student at a time.

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Title I Overview

Background & Purpose

Title I, Part A is located in sections 1111-1119 of the Elementary and Secondary Education Act (ESEA) of 1965 as amended by the Every Student Succeeds Act (ESSA) in 2015. Both ESEA and ESSA are commonly used when referencing and citing the statute. The purpose of Title I, Part A program is to provide all children with a significant opportunity to receive a fair, equitable and high-quality education, and to close educational achievement gaps. Title I, Part A is one of the largest federal programs supporting elementary and secondary education. Local education agencies (LEAs, also referred to as districts) are responsible for completing the program application and overseeing program implementation in participating schools.

Title I is a school-based program and the majority of funds a district receives should be allocated to the schools. A district must allocate Title I, Part A funds to participating schools based on Title 1, Part A allocation procedures. For complete information regarding Title I regulations schools should refer to the 2018-19 Title I Handbook provided by the Kentucky Department of Education.

Documenting Program Compliance

Records must be maintained at both the school and district level for a period of five years. Records can be maintained electronically. Hart County Schools will utilize Title I Crate to organize and house Title I documentation. Documentation must be submitted at the school level by Principal and/or Title I Representative and at the district level by the Federal Programs Director.

Schoolwide Program Core Plan Components

A school with at least 40% low income is eligible to have a School Wide Program (SWP). There are three core components required by statute for effective implementation of a SWP: I. Conducting a comprehensive needs assessment; II. Preparing a comprehensive schoolwide plan; and III. Annually reviewing and revising, as necessary, the schoolwide plan.

- I. The goal of the needs assessment is to use academic data for the entire school and stakeholder feedback to determine the subjects and skills for which teaching and learning need to be improved, as well as gain a better understanding of the root causes of the identified needs. ESSA 1114(b) requires each school operating a SWP to develop a plan based on a comprehensive needs assessment and the specific functions of the needs assessment are outlined in 34 CFR 200.26(a). Each school completes a comprehensive needs assessment as part of the comprehensive improvement planning process each year. The needs assessment is based on performance of all children in the school toward meeting state academic expectations and identifies priority needs. The identified priority needs must determine how resources are used. Title I funds should be used to support at least one of the needs identified on the comprehensive needs assessment.
- II. The data gathered during the needs assessment is used to develop a plan describing how the school will improve academic achievement and address the identified needs throughout the school, but particularly for the lowest-achieving students. The Comprehensive School Improvement Plan (CSIP) completed by all Kentucky schools serves as the school's SWP and a separate SWP plan is not required. Title I should be listed in the funding column of the CSIP for any applicable activities and strategies and approximate amounts should be provided whenever possible.

- III. ESSA 1114(b)(3) states that the plan and its implementation shall be regularly monitored and revised as necessary based on student needs to ensure that all students are provided opportunities to meet Kentucky's challenging academic standards and ensure continuous improvement. The method(s) used to evaluate the effectiveness of strategies and activities are outlined in the CSIP.

Flexibility of Funds in a Schoolwide Program

A school operating a SWP may use Title I funds for any allowable activity that supports the needs of students in the school as identified through the comprehensive needs assessment and articulated in the schoolwide plan (CSIP). In designing and implementing SWP, a school must implement strategies that:

- Provide opportunities for all children to meet the challenging state academic standards.
- Use methods and instructional strategies that strengthen the academic program in the school, increase the amount and quality of learning time, and help provide an enriched and accelerated curriculum, which may include programs, activities and courses necessary to provide a well-rounded education.
- Address the needs of all students, but particularly those at risk of not meeting challenging state academic standards.

The following list provides examples of some of the potential uses of funds available to schools operating a SWP. Please note that the list does not represent ALL allowable uses of Title I, Part A funds in a schoolwide program.

- High-quality preschool or full-day kindergarten and services to facilitate the transition from early learning to elementary programs.
- Recruitment and retention of effective teachers, particularly in high-needs subjects.
- Instructional coaches to provide high-quality, school-based professional development.
- Increased learning time.
- Evidence-based strategies to accelerate the acquisition of content knowledge for English Learners.
- Counseling, school-based mental health programs, mentoring services and other strategies to improve students' nonacademic skills.
- School climate interventions (e.g., anti-bullying strategies, positive behavior interventions and supports).
- Equipment, materials and training needed to compile and analyze student achievement data to monitor progress, alert the school to struggling students and drive decision-making.
- Response-to Intervention strategies intended to allow for early identification of students with learning and behavioral needs and to provide a tiered response based on those needs.
- Activities that have been effective at increasing family and community engagement in the school, including family literacy programs.
- Devices and software for students to access digital learning materials and collaborate with peers, and related training for educators.

Unauthorized Title I Purchases include, but are not limited to the following:

- Furniture and fixtures
- Items for maintenance of building (custodial/maintenance supplies, lawn mowers, etc)
- Physical Education/Playground Equipment
- Computer/technology equipment for administrators/clerical staff
- Promotional items/materials (mugs, key-chains, tote-bags, etc)
- Office supplies (paperclips, staples, paper, etc)
- Dues for professional organizations

- Registrations or travel costs for administrative conferences/events
- Communication equipment (walkie-talkies, telephones, beepers, etc)

Parent and Family Engagement

Involving families as partners in the education process is critical throughout a child's academic career. When families support learning, children are more successful in school, and school success helps children become successful adults. The district must provide opportunities for families to actively participate in the planning, implementation, and review of school and district Title I, Part A programs.

ESSA 1116(a)(3)(B) states that parents and family members of children receiving services under Title I shall be involved in the decisions regarding how funds reserved are allotted for parental involvement activities. Districts should solicit input from parents regarding how these funds should be spent.

The intent of the family engagement program is to build capacity for involvement by fostering and increasing two-way communication between schools and parents as well as providing parents the tools and strategies needed to help improve their children's academic achievement. Parent and family engagement events must support that intent and purpose and may not be purely social in nature.

Each district receiving Title I, Part A funds must develop a written parent and family engagement policy (see appendix A).

School Level Parent and Family Engagement Requirements

Each school receiving Title I funds must...

- Annual Meeting - hold an annual meeting to share information about the Title I, Part A program with the parents of all participating students. All parents should be invited and encouraged to attend.
- School Parent and Family Engagement Policy - develop a written parent and family engagement policy that is distributed to parents and reviewed jointly with parents on a regular basis.
- School Compact - develop a school-parent compact that outlines how parents, the entire staff and students will share the responsibility for improved student academic achievement. Compacts should be signed by all involved parties (school representative, parent/guardian, and student as appropriate) and kept on file at each school. Compacts must also be discussed during at least one parent event at the elementary level as it relates to the individual child's achievement.

District Level Family Engagement

The District Title I Advisory Council (must include parent representation from each school) serves as an advisory group in the planning, implementation, and review of the district's parent involvement policy. Each Title I school **should** select a parent representative to serve on the District Title I Advisory Council. These representatives are responsible for attending quarterly meetings and serving as liaisons for Title I schools. These representatives must collaborate with school Title I Representatives, school administration, and Family Resource and Youth Service Center Coordinators at Title I schools to help increase parent involvement, share information, and promote a strong parent-school partnership.

Annual Evaluation

The effectiveness of the district parent and family engagement policy in improving the academic quality of all schools served by Title I must be reviewed every year. The evaluation will identify:

- Barriers to greater participation by parents in Title I and other parent and family engagement activities.
- The needs of parents and family members to assist with the learning of their children, including engaging with school personnel and teachers; and
- Strategies to support successful school and family interactions.

Parent feedback can be gathered throughout the year after parent and family engagement activities, or at the end of the year. Surveys may be used to collect data. Once feedback has been gathered, it should be analyzed and next steps should be identified to address any issues.

Private School Children

The district must annually offer equitable participation in Title I, Part A service to each private school that has children from participating Title I, Part A attendance areas.

Children in Foster Care and Homeless Children and Youth

The ESEA as amended by ESSA emphasizes the educational stability of vulnerable students, including those in foster care or who are homeless. The Local Education Agency (LEA) must designate a point of contact/liaison for these students and their families.

All districts receiving Title I funds must reserve “such funds as may be necessary” in the homeless set-aside GMAP application for homeless students. Title I funds may be used to meet basic needs of homeless students (clothing, supplies, health care, tutoring services, etc.) so that they may participate more fully in school.

English Learners

ESSA outlines requirements for ELs under Title I, Part A to include EL Proficiency and Assessment. Kentucky has adopted the WIDA English Language Development Standards and uses the WIDA’s ACCESS as the annual ELP assessment. ESSA 112(e)(4) states that the district’s Title I, Part A plan must assure that the district will coordinate and integrate services provided under Title I, Part A with other educational services that the district or school level, such as services for English Learners, in order to increase program effectiveness, eliminate duplication and reduce fragmentation of the instructional program.

Hart County Schools Fiscal Management Procedures for all Federal Funds

Federal Programs Spending Process & Allowability of Purchases

Prior to spending any Federal Programs funds, the purchaser must determine allowability (allocable) based on the funding Matrix provided by the Kentucky Department of Education as well as ensure the purchase is necessary and reasonable. The purchaser will also ensure that proper procurement procedures are followed based on if the purchase is a micro-purchase, small purchase, or requires more formal methods. Procedures will be overseen by the District Federal Programs Director.

Each school’s Title I Representative and/or Principal will be responsible for initiating the purchase order process to spend their school’s Title I funds. Once a request has been made, the District Title I Coordinator will check MUNIS and budget to ensure that spending is allowable, aligned with their plan, and funds are available. Once that has been done, they will create/write and sign PO and return to school with approval to proceed in ordering.

Please see the Hart County School's Federal Grants Purchasing Addendum for more information related to procurement procedures using federal funds.

Supplement Not Supplant Methodology

All schools within the K-8 grade span are served in Hart County and therefore are exempt from this requirement.

Timely Expenditure of Funds and Carryover

In order to ensure 85% of grant funds are spent within the 15 month grant cycle, the District Federal Programs Director will run MUNIS reports quarterly to compare with district and school Title I budgets. Current spending balances will be shared with Principals and Title I Representatives at each school. Reminders to spend current year money within a given cycle will be included in this communication process.

Time and Effort

Each school's Title I Representative will be responsible for submitting appropriate time and effort documentation to the District Federal Programs Director monthly/bi-annually. All staff members paid 100% out of Title I funds will complete a semi-annual certification on or around December 15 for time served from July 1-December 31 AND on or around May 15 for time served from January 1-June 30. All staff members paid partially out of Title I funds will complete monthly Personnel Activity Reports (PAR). These reports will be submitted around the 5th of each month (ie, August's PAR report will be due September 5).

District Parent and Family Engagement Policy



Hart County Schools recognizes our students' families and local community members as essential partners in helping each student succeed. We commit ourselves to:

- Sharing information about student progress with the student's family.
- Offering practical suggestions to families on how they can support student learning at home.
- Including parent and family representation on our District Advisory Council (DAC), and in our decision-making process.

A presentation on the Title I, Part A program and parents' right to be involved will be shared at each school during the beginning of school activities each year. In addition to the annual meeting information regarding Title I will be available in the student handbook and on the school's webpage. A Parent/School Compact will be sent home with each child that outlines the partnership agreements between school staff, the parent/guardian and the student.

Each year the district will host a parent and family engagement event, such as the annual District Literacy Event. This event will encourage parents/guardians to sign their child(en) up for the summer reading program. Students will receive free books and parents will receive tips and strategies to help prevent the summer slide. Each Title I school will also host parent and family engagement activities annually.

Each school will select a parent representative to serve on the DAC committee each year. This committee will meet quarterly throughout the school year (4 times/year) to discuss and make decisions based on District/School Title I programming. All parents will have the opportunity to provide feedback on the policy through an end-of-year evaluation survey and a policy development/revision meeting held in May. Each Title I school will also have a Title I School Advisory Council (SAC) to oversee schoolwide programming.

Any comments or concerns regarding Hart County's Parent and Family Engagement Policy may be submitted to Hart County's Title I Coordinator, Megan Crump.

Megan Crump
Title I Coordinator
25 Quality Street, Munfordville, KY 42765
270-524-2631
megan.crump@hart.kyschools.us



Hart County School's Federal Grants Purchasing Addendum

These procedures will be used by the Hart County School District for the acquisition of property or services required under a federal award or subaward.

1. Hart County School District will maintain oversight to ensure all contractors perform in accordance with the terms, conditions, and specifications of their contracts or purchase orders.
2. The Hart County School District will demonstrate strong oversight of funds by:
 - a. avoiding acquisition of unnecessary or duplicative items
 - b. consolidating or breaking out procurements to obtain a more economical purchase, unless doing so results in the district lowering the contract amount and avoiding the more competitive procurement process (e.g., informal vs. formal procurement) which would be required at the higher cost threshold
 - c. Where appropriate, an analysis will be made of lease versus purchase alternatives, and any other appropriate analysis to determine the most economical approach.
3. The Hart County School District may enter into state and local intergovernmental agreements or inter-entity agreements where appropriate for procurement or use of common or shared goods and services. Competition requirements will be met with documented procurement actions using strategic sourcing, shared services, and other similar procurement arrangements.
4. The Hart County School District will use federal excess and surplus property instead of purchasing new equipment and property whenever such use is feasible and reduces project costs.
5. The Hart County School District will only award contracts to responsible contractors possessing the ability to perform successfully under the terms and conditions of a proposed procurement. Consideration will be given to such matters as contractor integrity, compliance with public policy, record of past performance, and financial and technical resources.
6. The Hart County School District will maintain records sufficient to detail the history of each procurement. These records will include, but are not limited to, rationale for the method of procurement, selection of contract type, contractor selection or rejection, and the basis for the contract price.
7. Avoidance of time-and-materials type contracts. The Hart County School District will use a time-and-materials type contract, only after a determination that no other contract is suitable and the contract must include a ceiling price that the contractor exceeds at its own risk. If awarding such a contract, the district will assert a high degree of oversight to have reasonable assurance that the contractor is using efficient methods and effective cost controls.
8. The Hart County School District will take all necessary affirmative steps to ensure that minority businesses, women's business enterprises, veteran-owned businesses, and labor surplus area firms are used when possible, in accordance with 2 CFR 200.321.

9. The Hart County School District will, as appropriate and to the extent consistent with law, provide a preference for the purchase, acquisition, or use of goods, products, or materials produced in the United States. The requirements of 2 CFR 200.322 will be included in all contracts and purchase orders for work or products.

10. The Hart County District will ensure full and open competition for procurement transactions using federal funds, including but not limited to, excluding contractors that develop specifications, statements of work, requirements, etc. from competing for such contracts; not specifying a particular brand name in a proposal; and/or not taking an otherwise arbitrary action. 2 CFR 200.319.

11. The Hart County School District will perform a cost-benefit or price analysis in connection with every procurement action in excess of the state/local requirements of \$40,000, including contract modifications. The methods and degree of analysis will depend on the facts of each individual procurement, but as a starting point, the district will make independent estimates of costs before receiving bids or proposals. 2 CFR 200.324.

12. Upon request and consistent with 2 CFR 200.325, the Hart County School District will make available to KDE the technical specifications on proposed procurements where KDE believes such review is needed to ensure that the item or service specified is the one being proposed for acquisition.

13. For construction or facility improvement contracts exceeding the state/local requirements of \$40,000, the Hart County School District will ensure appropriate bonding requirements are met. 2 CFR 200.326.

14. The Hart County School District's contracts will contain the applicable provisions described in Appendix II to 2 CFR Part 200. All contracts made by the district under the federal award will include the following provisions, as applicable:

a) Contracts for more than the simplified acquisition threshold (\$250,000) or a lower amount set by state/local requirements (currently set at \$40,000 per KRS 45A.385), must address administrative, contractual or legal remedies in instances where contractors violate or breach contract terms, and provide for sanctions and penalties as appropriate.

b) All contracts in excess of \$10,000 must address termination for cause and for convenience, including the manner by which it will be effected and the basis for settlement.

c) All contracts that meet the definition of 'federally assisted construction contract' will include the equal opportunity clause provided under 41 CFR 60-1.4(b).

d) Construction (including renovation, decoration and maintenance) contracts in excess of \$2,000 will include a provision for compliance with the Davis-Bacon Act.

e) Contract Work Hours and Safety Standards Act. All contracts awarded by the district over \$100,000 that involve the employment of mechanics or laborers will include a provision for compliance with 40 U.S.C 3702 and 3704.

f) Contracts awarded by the district in excess of \$150,000 will contain a provision that requires the parties to agree to comply with applicable requirements of the Clean Air Act and the Federal Water Pollution Control Act.

g) Debarment and Suspension. The district will not award any contract to a party listed on the governmentwide exclusions in the System for Award Management (SAM.gov).

h) Byrd Anti-Lobbying Amendment. The district will ensure that contractors that

apply or bid for an award exceeding \$100,000 file the required certification, and that each tier certifies to the tier above that it will not and has not used federal appropriated funds to pay any person or organization for influencing or attempting to influence an officer or employee of any agency, member of Congress, officer or employee of Congress, or an employee of a member of Congress in connection with obtaining any federal contract, grant or award.

i) Procurement of recovered materials. As applicable, the district will ensure contractors are in compliance with section 6002 of the Solid Waste Disposal Act, as amended by the Resource Conservation and Recovery Act.

j) Prohibition on certain telecommunications and video surveillance services or equipment. The district will ensure the contractor does not subcontract, procure or obtain equipment, services or systems that uses covered telecommunications equipment or services as a substantial or essential component of any system, or as critical technology as part of any system. As described in Public Law 115–232, section 889, covered telecommunications equipment is telecommunications equipment produced by Huawei Technologies Company or ZTE Corporation (or any subsidiary or affiliate of such entities).

k) Domestic preferences for procurements. As appropriate, practicable and to the extent consistent with law, the district will ensure the contractor agrees to provide a preference for the purchase, acquisition or use of goods, products, or materials produced in the United States (including but not limited to iron, aluminum, steel, cement and other manufactured products).

Methods of Procurement Using Federal Funds

For federal funds, the following methods must be used:

1. Micro-purchases up to \$1,000 may be made without obtaining quotes.
2. Small purchases between \$1,000 and \$40,000 may be made after soliciting at least three (3) quotes from qualified sources.
3. Purchases over \$40,000 must be conducted in accordance with state law, including sealed bids, requests for proposals and reverse auctions, as appropriate.
4. Noncompetitive procurements at any price are allowed with federal funds in the following circumstances: (i) micro-purchases; (ii) single source; (iii) emergency/exigency does not permit delay from publicly advertising; (iv) prior approval from the awarding agency to conduct a noncompetitive procurement; (v) ran a competitive solicitation but did not receive responses.