

Walton County 21st Century Community Learning Center Operations Manual

21st Century Community Learning Centers provide academic enrichment opportunities during non-school hours for children. The programs provide a safe environment for academics, particularly for math, language arts, and reading through enrichment. The focus is on embedded learning through real-world projects and activities. The program is open to all students for registration, but is voluntary and serves a target number of students. Therefore, there may be a waiting list. The purpose is to provide activities that improve academic achievement, offer enrichment designed to reinforce and complement the regular school curriculum, and provide opportunities for families to be actively engaged in their child’s education. The centers expose lower income or lower performing students to opportunities and activities that would not normally be afforded to them. For students who have not been successful in the regular school day, more of the same is not likely to produce success. 21st Century Community Learning Center activities are often multi-disciplinary and designed to help students enjoy sessions where they simultaneously learn and master skills that have been giving them difficulty, and translate this into improvement in the regular school day. Walton County School District operates eleven 21st Century Community Learning Center sites, grades K-12. Measurable goals and objectives are set and include improvement in test and classroom grades, improvement in behavior, improvement in class participation, and family satisfaction with the program. Participating students will receive a healthy snack and transportation home each day.

Policies and Procedures

21st Century Community Learning Centers (21st Century Community Learning Center) shall follow all the policies set by Walton County Board of Education. The 21st Century Community Learning Center Advisory Council and/or administration may set procedures used only by 21st Century Community Learning Center sites. These procedures may only be more stringent and not less stringent than present policies and procedures set by the Walton County Board of Education.

Period of Performance and Availability

(2 CFR §200.77, 200.309, 00.403(g); 34 CFR §76.707)

The intent of federal funds is to benefit students in that fiscal year through the grant period as indicated on the Grant Award Notice (GAN). Upon receiving a grant, a copy of the award letter is given to the Finance Director and the Chief Financial Officer. The budget is not released until the date specified on the award letter. All amendments and extensions are copied to the Director of Finance. The year-to-date budget is monitored monthly by the Project Director to make sure funds are spent within the time availability and at a rate consistent to end with the end of the grant. 21st Century grant awards must be annually accepted and approved by the Board of Education. Programs must operate for the total number of hours and days as described in the approved grant. WCSD will comply with 21st Century grant administration procedures from award notification to close-out in accordance with all applicable laws and regulations.

Fiscal Management

21st Century follows the policies and procedures for fiscal management including tracking of 21st Century Community Learning Center funds as adopted by the Walton County Board of Education. Walton County School District shall follow the budgeting and accounting procedures found in the Financial Accounting Handbook or other guidance published by the State Board of Education. The Project Director must adhere to the Chart of Accounts and corresponding guidance found on the GaDOE website (also supplied in the 21st Century Subgrantee Operations Manual).

Allowability of Cost (2CFR §200.302(b)(7))

21st Century purchases must follow funding guidelines for allowable costs. WCSD follows guidelines as detailed in EDGAR, OMB Circulars, and applicable memos, letters, handbooks and/or other communication regarded allowable/unallowable purchases provided by the Georgia Department of Education. The Project Director will direct any questionable expenses to the 21st Century Finance Analyst for further clarification. All costs must be necessary, reasonable, and allocable and must be adequately documented. To determine whether a cost is reasonable, the following questions should be answered: 1) Do we really need this? 2) Is this directly related to the program need? 3) Do we have the capacity to use it? 4) Is the price fair? The Project Director has the responsibility of determining allowability of purchases. Considerations when making allowability determinations include:

- Does the purchase align with prioritized need?
- Does the purchase align with the program purpose?
- Does the purchase meet the “supplement not supplant” requirements?
- Is the purchase necessary and reasonable?
- Can the purchase be adequately documented?

A cost considered **reasonable** if, in its nature and amount, does not exceed that which would be incurred by a prudent person under the circumstances prevailing at the time the decision was made to incur the cost. A cost is considered **necessary** if it meets an existing, documented need. A cost is considered **allocable** if the goods or services being purchased are chargeable or assignable in accordance with relative benefits received and consideration should be given as to whether the cost is being incurred specifically for that federal program and necessary for operation of the program. WCSD 21st Century funds will only be used to pay for authorized items and activities to meet the needs of participating students and families. Purchases must be openly negotiated and/or researched so as to provide the best quality, price, and service for the students, including contracts with organizations to provide services. All purchases must be approved by the Project Director prior to purchase, and be purchased via the P.O. process underneath the fiscal agency’s internal controls. Costs will conform with federal law and grant terms, be incurred in accordance of the pre-approved budgets, and be consistent with state and local policies and procedures that apply uniformly to

both federally financed and other activities of the non-federal entity. Costs are tracked through budgets which are set up with specific items and services to be paid from each line. Schools are not given access to make purchases without going through the Project Director, nor are they given access to certain lines such as personnel and benefits. If the school wants to buy something not specifically named in the grant it must be approved by the Project Director.

Costs are adequately documented. The Project Director approves all purchases. Amendments will be submitted and approved by GaDOE as required by the federal award when necessary. Documentation of all funds management is located in the school district's accounting software (MUNIS). Costs will only be incurred during the period of performance for the grant award. Costs incurred before the award must be authorized by the awarding agency. Financial records adhere to Generally Accepted Accounting Principles (GAAP) and WCSO is audited annually to ensure that all costs are in accordance to GAAP. If an external auditor is used, the cost of the audit shall be paid from the funds being audited using an accounting system that complies with GAAP. 21st Century Community Learning Center is a reimbursement grant and all reimbursements are based only on actual expenses charged to the grant. 21st Century Community Learning Center is charged net cost – meaning that any discounts, refunds, credits, or other adjustments to purchase costs will be allocated back to the grant to ensure no overpayments are made. Costs must be accorded consistent treatment. Costs will not be charged to the federal award as a direct cost if other costs associated with the same purpose were charged as an indirect cost. WCSO federal programs are treated equally and indirect costs are charged based on the percentages set forth by Georgia Department of Education. All charges are applied using the same calculations. Costs incurred and charged to a federal award will not be used to match or in cost sharing requirements for other federal awards of the organization in either current or a prior period. The organization uses contributions for matches that are required by awards.

Federal funds can never be used to purchase incentives for students, teachers, or to entice participation in professional learning activities. Food for parent involvement activities must be considered "light refreshments." Light refreshments has been defined as donuts, fruit, muffins, juice, coffee, chips, pretzels, popcorn, raw vegetables and dip, nuts, cookies, brownies, punch, soda, and water. Light refreshments does not include pizza, sandwiches, or anything that could be considered any part of a meal. Federal funds can only be expended for those events that "build capacity." This means you can fund a snack for a workshop teaching parents a specific skill, but could not give snacks to parents volunteering.

The 21st Century Project Director pulls a year-to-date budget report monthly to monitor expenditures and to check for compliance. The Project Director works with Accountant and Director of Budget and Finance to ensure that the budgets are set up properly, keep accounting data reconciled, and follow grant guidelines. The Project Director attends all training on federal, state and local grants on program and

budget management. Regular meetings are held with Site Coordinators of 21st Century Community Learning Centers to assure grant guidelines are being followed. The Project Director will contact the Fiscal Analyst or consult EDGAR if there is a question about whether or not a purchase is allowable. WCSD will conform to any exclusions or limitations as set forth by the 21st Century grant.

Cash Management (2 CFR §200.302(b)(6), §200.305)

All School District bank accounts are opened under the District's Federal Tax Identification Number. Each bank account has a corresponding cash account in the accounting system, set up by the CFO, to record all transactions. These transactions flow directly to the general ledger. Bank statements are reconciled monthly to the cash accounts on the general ledger. Bank reconciliations should be signed and dated by the preparer. The preparer's supervisor or supervisor's designee must also sign and date the bank reconciliation, indicating their review of the reconciliation. There are no fees or other income for WCSD's 21st Century Community Learning Centers.

21st Century grants are administered on a reimbursement or draw down basis. The District does not receive the actual cash in advance. Reimbursements draw downs are made based on actual expenditures incurred for a reporting period. Federal and state grants, including 21st Century, with the Georgia Department of Education are reimbursed through the Grants Accounting Online Reporting System (GAORS). The Accountant will submit draw down requests each month for all state and federal grants. A Year-to-Date Budget Report is run after the final monthly payroll is posted to confirm expenditure draw amounts and used to submit the monthly draw request through GAORS. The draw request forms are approved by the Director of Budget and Finance. 21st Century accounting information is tracked separately for each grant award.

The 21st Century Community Learning Center Project Director works with Director of Finance to ensure that budgets are set up properly and follow grant guidelines. 21st Century Community Learning Center supply purchasing is managed by the Administrative Grants Coordinator who works with the Procurement Department and utilizes the procedures set forth under district internal controls regarding purchasing. Purchase Orders are required prior to all purchases and contract work to be done by individuals or organizations. The Project Director approves all PO's. The Site Coordinators and bookkeepers are notified by email of approval of requests. Invoices are accepted only after services are performed. They are checked against the purchase order and the budget and must be approved by the Project Director and Assistant Superintendent prior to payment. Processes and documentation of all aspects of cash management is kept in the district's accounting software (MUNIS). All Budget transfers have to be approved by the Project Director and Assistant Superintendent and PO's must be approved by the Procurement Coordinator. All of these positions are at the Board of Education and not in the schools. Anything unusual is either reported to the Project Director, Assistant Superintendent or Director of Finance immediately. All Site Coordinators/21st Century Community Learning Centers have copies of

OMB circulars and the lists of allowable and unallowable expenses. The Project Director and Assistant Superintendent sign approvals of reimbursements for phone, mileage or any allowable expense paid up front by individuals. WCSD has comprehensive internal controls established that are strictly adhered to regarding personnel, asset management, procurement, inventory, bank reconciliation, bank transfers, cash receipts & receivables, accounting, cash disbursements, and budgets. This ensures 1) effectiveness and efficiency of operations, 2) reliability of financial reporting, 3) compliance with applicable laws and regulations, and 4) safeguarding assets to ensure they are used solely for the authorized purposes.

Presently, there are no fees or other income for 21st Century Community Learning Centers.

The Walton County Board of Education requires that any local school funds collected from students and from other sources for student activities shall be expended for the purpose of the project, including school related incidental expenses incurred by teachers and other school personnel. All purchases and/or contracts for or on behalf of students shall be made in accordance with the procedures of the district. Principals are required to submit quarterly reports to the Superintendent showing all receipts and disbursements from student funds. The principal of each school shall establish and maintain under his or her control a bank account for the deposit of all funds derived from any activity occurring within each school or a separately numbered account for each activity, including clubs, athletics, or other student activity generating funds. The principal shall also establish a general funds or account for all profits received from the sale of soft drinks, pictures, or undesignated fund-raising activities. The general fund or account shall be expended only for programs or activities within the school where the funds were raised unless the Board of Education has granted its prior approval. The principal shall be responsible for the integrity of each account of the local and pupil funds accounts and insure that all funds are properly deposited. The school principal and district superintendent are the only two individuals authorized to sign school activity fund checks. Districts are allowed, with GaDOE approval, to consolidate federal ESSA grant funds from several programs in order to pay for the costs associated with the administration of those programs. However, Walton County School District does not consolidate funds.

Drawdowns

Funds are drawn down from the state's Grants Accounting Online Reporting System (GAORS) based on actual program expenditures. No excess cash balances are maintained at the district level. If the district must draw down greater than 10% of the total amount of any grant at one time, a written explanation will be provided to GaDOE.

- It is the responsibility of the appropriate Project Directors and Finance Department personnel to work cooperatively to review all expenditures on a monthly basis after budget approval before funds are drawn down from GAORS. Moreover, the following practices are observed:
- Coordinators for each federal program must reconcile their respective budgets monthly to ensure that all expenditures charged to their program are allowable.

- Finance Department personnel will perform periodic reviews of the general ledger, including federal accounts and fund sources.
- The Accountant will draw down funds monthly based on actual expenditures and on an after-the-fact, reimbursement basis only.
- The Finance Department personnel who process the draw down from GAORS provides a copy of the draw down report to the appropriate Project Director
- Once the drawdown funds are received into the district's bank account, Finance Department personnel create a journal entry in Munis.
- Finance Department personnel reconcile all bank statements and perform periodic review of the general ledger.
- Project Directors ensure that equipment/supplies are purchased and received during the period of performance of each grant award.

Completion Reports

At the end of each fiscal year, Finance Department personnel generate a report from Munis that compares the total amount of the original grant award to the total amount of funds that were expended. The coordinator for each federal program reviews and signs off that the expenditure report and approved budget match and that a completion report can be entered and submitted to GaDOE. Completion reports are due to GaDOE no later than 30 days after the initial 15 month period of availability ends (i.e, October 30). Original completion reports are kept on file in the Finance Department and copies are provided to appropriate Project Directors.

Procurement (2CFR §200.318; 2CFR §200.319; 2 CFR §200.320)

The Walton County School District shall ensure that the process of procuring goods and services is fair and equitable by taking the following measures:

- Incorporating a clear and accurate description of the technical requirements for the material, product, or service to be procured. The description must not, in competitive procurements, contain features which unduly restrict competition. The description may include a statement of the qualitative nature of the material, product or service to be procured and, when necessary, must set forth those minimum essential characteristics and standards to which it must conform if it is to satisfy its intended use.
- Avoid providing detailed product specifications.
- When it is impractical or uneconomical to make a clear and accurate description of the technical requirements, a “brand name or equivalent” description will be used as a means to define the performance or other salient requirements of procurement. The specific features of the named brand which must be met by offers will be clearly stated.

- Identify all requirements which the offers must fulfill and all other factors to be used in evaluating bids or proposals.
- Ensure that all prequalified lists of persons, firms, or products which are used in acquiring goods and services are current and include enough qualified sources to ensure maximum open and free competition. Also, the school system will not preclude potential bidders from qualifying during the solicitation period.

WCSD Methods

Micro purchase – for acquisition of supplies or services, the aggregate dollar amount of which does not exceed \$10,000, which are completed without soliciting competitive quotations if the price is reasonable, and are distributed equitably among qualified suppliers.

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

When spending federal funds, employees of the school district shall engage in comparative buying and obtain bids and quotes whenever appropriate. Large purchases are to be solicited using written quotations or formal solicitations. The detailed specification is to be provided in writing to at least three vendors known to be able to supply the needed goods or services, with the written responses and any notations made regarding those responses retained and evaluated. Large purchases require a cost or price analysis, sealed bids, and/or competitive proposals. Cost analysis means evaluating the separate cost elements that make up the total price, including profit. Price analysis generally means evaluating the total price. 21st Century Community Learning Centers posts open bids on the Procurement Page of the WCSD website and utilizes a rubric system to compare submitted bids before selection is made.

Whenever possible, a minimum of 3 bids are reviewed.

The Board of Education may reject any or all bids. The Board may in its judgment consider such factors as service, location, and timeliness of delivery; therefore, they may accept the bid that appears to be in the best interest of the school system even if it is not the lowest bid. 21st Century Community Learning Centers posts open bids on the Procurement Page of the WCSD website and utilizes a rubric system to compare submitted bids before selection is made. The Board reserves the right to waive any formalities in or reject any or all bids or any part of any bid.

Purchases Requiring Bids

The procurement of goods and services must be in accordance with WCSD BOE Policy DJED – Bids and Quotations. Employees who have been delegated the responsibility for the purchase of goods and services shall utilize the highest standards for proper and ethical purchasing procedures. Competitive purchasing shall be used whenever possible, and prospective vendors shall be given equal consideration

to compete for the provision of goods and services to the School District. The right of any vendor to compete shall not be unreasonably withheld.

Purchases of less than \$3,000 may be made using the discretion of the buyer. Unless otherwise directed by the Superintendent or his/her designated representative, no formal competition is required – but is recommended when circumstances make it practical to do so. Purchases of at least \$3,000 but less than \$25,000 may be solicited by telephone or Internet search. At least three vendors known to be able to supply the needed goods or services must be contacted and a written log of the request and the quotations must be made and retained. 21st Century Community Learning Centers posts open bids on the Procurement Page of the WCSD website and utilizes a rubric system to compare submitted bids before selection is made. Whenever possible, a minimum of 3 bids are reviewed. The Board reserves the right to waive any formalities in or reject any or all bids or any part of any bid. Purchases of at least \$25,000 but less than \$100,000 are to be solicited using written quotations. The detailed specification is to be provided in writing to at least three vendors known to be able to supply the needed goods or services, with the written responses and any notations made regarding those responses retained. Fax solicitations and/or responses are acceptable, as are electronic (email, web-based, etc.) transmissions. The Board reserves the right to waive any formalities in or reject any or all bids or any part of any bid. Purchases of \$100,000 or more are to be solicited using formal solicitations requiring sealed responses and public openings. This will include Invitations to Bid, Requests for Proposal, and related solicitation methods. A formal solicitation shall appear continuously on the Walton County School District website at least four weeks prior to the bid opening. Additionally, newspaper advertising must appear on at least two separate dates within ten days of posting the formal solicitation. If a mandatory pre-bid conference is being used, the second newspaper ad shall appear prior to the date of that conference.

In compliance with Section 2 CFR 200.320, any purchases in excess of \$150,000 including contract modifications will require a cost or price analysis, sealed bids, and/or competitive proposals. Cost analysis means evaluating the separate cost elements that make up the total price, including profit. Price analysis generally means evaluating the total price.

Sole source bids may be used only when one or more of the following circumstances apply:

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

No purchase or contract shall be divided into parts for the purpose of avoiding the competitive bid process. 21st Century Community Learning Centers posts open bids on the Procurement Page of the WCSD website and utilizes a rubric system to compare submitted bids before selection is made. Whenever possible, a minimum of 3 bids are reviewed. The Board reserves the right to waive any formalities in or reject any or all bids or any part of any bid. Any bid may be withdrawn prior to the scheduled time for the opening of bids.

Suspension & Debarment (2 CFR 180.220)

Public school districts are subject to the non-procurement debarment and suspension regulations implementing Executive Orders 12549 and 12689, 2 CFR part 180. These regulations restrict awards, sub awards, and contracts with certain parties that are debarred, suspended, or otherwise excluded from or ineligible for participation in Federal assistance programs or activities, including school funding.

Each Project Director is responsible for checking the System for Award Management (SAM) database, found at <https://www.sam.gov/portal/SAM/##11>, to ensure that vendors are not on the list of suspension and/or debarment. Evidence of the verification will be in the form of a search result screenshot signed, dated, scanned and kept on file.

The Walton County School District does not purchase any goods or services in any amount from any vendor or contracted person/company identified on this website as being suspended or debarred.

Conflict of Interest (2 CFR 200.318(c))

It is the policy of WCSD to avoid doing business with individuals or organizations who have a conflict of interest or the appearance of a conflict of interest. Employees of the Walton County School District who are engaged in the selection, awarding, and/or administration of contracts and/or grant awards shall abide by the following:

- No employee, officer, or agent may participate in the selection, award, or administration of a contract supported by a federal award if he or she has a real or apparent conflict of interest.
- Such a conflict of interest would arise when the employee, officer, or agent, any member of his or her immediate family, his or her partner, or an organization which employs or is about to employ any of the parties indicated herein, has a financial or other interest in or a tangible personal benefit from a firm considered for a contract.
- Instances where conflict of interest may occur shall include those of the grant applicant, its affiliates, proposed consultants, subcontractors, or other key personnel. Past interest shall be limited to within one year of the date of the applicant’s grant proposal and include any person owning more than 20% interest in the applicant, an applicant’s corporate officers, board members, senior management, any employee who is responsible for making decisions or taking

action on the application or any resulting agreement where the decision or action can have an economic or other impact on the interests of a regulated or affected organization.

- Officers, employees, and agents of the Walton County School District may neither solicit nor accept gratuities, favors, or anything of monetary value from contractors or parties to subcontracts.
- 21st Century employees shall not accept payment from booster clubs, parent organizations or groups, students, or parents of students. Employees shall not solicit sales from students or their parents or advertise or endorse products or services aimed at students or their parents.
- Employees may not charge 21st Century Community Learning Center participants for tutoring.
- Unless a clinic, camp, or similar activity is officially sponsored by the school district and approved by the Board of Education, employees who have prior approval of the board to conduct clinics, camps, etc., and wish to use school district property must lease such property from the Board of Education.
- Employees shall maintain integrity with students, colleagues, parents, patrons, or businesses.
- Violation of these standards will result in reporting of said personnel to the Superintendent of Schools and if appropriate, local authorities. Any misconduct could result in suspension, loss of employment, and any other consequences that are applicable by law.
- Any violation of these procedures must be disclosed in writing, in a timely manner. All violations of federal criminal law involving fraud, bribery, or gratuity violations potentially affecting the federal award must be reported as failure to make disclosures can result in (remedies for noncompliance, including suspension and debarment).

Mandatory Disclosures (2 CFR 200.113)

If any employee becomes aware of any violation of federal criminal law involving fraud, bribery, or gratuity violations, he/she must disclose such in writing in a timely manner.

Time and Effort (2 CFR §200.430)

Charges to a federal fund for employee compensation, including salaries, wages, and benefits, must be based on records that accurately reflect the work performed. Employee who provide supplemental instruction outside of school hours must clock in and also complete a paper log of their specific activity. The appropriate Project Director will ensure that a semi-annual periodic certification or personnel activity reports are completed and maintained for all employees paid with federal funds.

Beginning in FY18, GaDOE has allowed increased flexibility regarding Time & Effort. The Walton County School District has elected to use the following procedures:

A semi-annual periodic certification will be maintained for any employee who worked on one federal grant or one cost objective (job). These certifications will be completed after-the-fact. The first certification will

be completed on the last work day in December and the second periodic certification will be completed at the end of the school year on the last day of June. The forms are signed by a supervisor having first-hand knowledge of the work performed by the employee, and are kept on file in the office of the appropriate Project Director. A Personnel Activity Report (PAR) will be maintained for any employee who works on more than one federal grant and/or more than one cost objective (job). These “split-funded” personnel paid in any part with federal funds are required to maintain monthly time logs. The logs are signed by the employee, the employee’s supervisor, and the appropriate Project Director.

Supplanting

21st Century Community Learning Center funds will be used to provide services not being provided by Title I or any other Federal, State or local funds that the Walton County School District (WCSD) or the contributing partners might receive. Funds will **supplement** (increase) other funding **not supplant** (replace). WCSD cannot use 21st Century Community Learning Center funds to supplant funds that would, in the absence of 21st Century Community Learning Center funds, have been spent on participating students.

Matching funds

Matching funds are placed in a fund with a separate number than 21st Century fund number.

Volunteer time is tracked by the Site Coordinator and reported to the Project Director. The time is calculated by what would be paid to the same person if they were being paid. Partners that teach classes appear on the schedule and calendars. Accepted industry standards for donations are used to determine cash match. For instance, if facility use is the approved cash match WCPS has a published cost for use schedule. The schedule and the calculations are maintained in the cash match notebook if appropriate. Project Director maintains all cash matching information.

Oversight of 21st Century programs at the schools is provided by Site Coordinators and Project Director. The Project Director is responsible for staying up to date on Federal OMB circulars and 21st Century state regulations, and communicating to Site Coordinator. Oversight of the Site Coordinators is provided by the Project Director. Oversight of Project Director is provided by Assistant Superintendent for compliance for programs and Coordinator of Budget and Finance for finance procedures

Inventory

The Elementary and Secondary Education Assistance Act of 1965 (ESEA) reauthorized by the Every Student Succeeds Act of 2015 (ESSA) requires that Local Educational Agencies (LEAs) implement and maintain financial management systems that substantially comply with federal systems management requirements. These requirements state that districts shall provide “effective control over and accountability for all funds, property, and other assets. Recipients shall adequately safeguard all assets and assure they are used solely for authorized purposes”.

The purchase of any equipment using 21st Century funds must be pre-approved by the Project Director who will ensure that the equipment is necessary for identified area of need and that it meets all requirements of the federal program for which it is being purchased.

An inventory of tangible personal property having a useful life of more than one year will be maintained. This includes all items purchased under state object codes 615 (expendable equipment) and 616 (expendable computer equipment) as well as other items generally considered to be inventory and pilferable items. Inventories will be maintained in the InTrack database and will include the following: description of property, serial number or other identification number, funding source, FAIN number, title holder, acquisition date, purchase price, percent allocated to the source, location of asset, disposal date, sale price of property.

21st Century equipment orders and shipments are handled at the Central Office. The Administrative Coordinator orders and receives the item(s), removes shipping tickets and opens the containers to label and process the inventory utilizing InTrack before issuing the item(s) to the program site. The tickets are maintained at the Central Office. Site Coordinators sign-off on receipt of the items and the location of the items. Materials purchased for use will be labeled as such and will be utilized in the capacity for which they were purchased. Any equipment, materials and/or supplies purchased with federal funds are considered solely for the use of that program. Equipment shall be retained and continue to be listed in InTrack for as long as there is need for such equipment to accomplish the purpose of the program for which it was purchased. Safeguards are in place to prevent theft, loss, or damage. 21st Century Equipment is typically kept in the Site Coordinator's office or in the location designated as a safeguard location as pre-approved by the Fiscal Analyst through the 21st Century Community Learning Center Technology Request for Approval. A check-out system is implemented when applicable and necessary to assure the equipment is used only during program hours.

Inventory of all equipment and property belonging to 21st Century will be identified and physically checked at least once yearly. This physical check will verify the existence, current utilization, continued need, and condition of each item listed. Documentation of completed inventory checks will be kept on file in the federal program office. The Project Director or Administrative Coordinator will also randomly check equipment, and may request an additional full physical inventory check at any time. Any discrepancies noted during physical inventory check must be addressed. This may mean moving a piece of equipment to another location, updating the inventory list, or further investigating to determine the status of a piece of equipment.

Requests for maintenance or repair of federally-funded equipment are made using the electronic technology work order process. In the case of equipment that is unable to be repaired, the Project

Director determines whether the equipment should be disposed of. Once a piece of equipment that was purchased with federal funds is no longer needed for its originally intended purpose, it can be designated as surplus. Items that are no longer usable need to be disposed of. A disposition form must be completed for any item that is declared surplus because it has met its originally intended purpose or because it is no longer usable. The date of disposition must be entered into the InTrack database. Once a disposition form has been completed and the disposition date has been entered into InTrack, the item can be repurposed or disposed of.

When computer equipment is no longer operational, it will be recycled or disposed. A Disposition Form must be completed and submitted and approved by the Project Director prior to the disposal of any computer equipment. Inventory records will be corrected and maintained in the InTrack database. The Technology Department assists with disposition of computer equipment following the above procedures.

In the event equipment or technology purchased with federal funds is lost, stolen, or damaged, the following procedure will be followed:

1. Complete form.
2. Submit form to Project Director
3. Make corrections to the inventory in the InTrack database.

Records regarding equipment that has been disposed of shall be maintained by the school and/or district for at least five (5) years following the final disposition of the item.

GaDOE provides flexibility regarding purchases of software, computers, and equipment that cross grant periods as follows:

- Purchases may extend beyond one year to take advantage of cost reductions if the students in the current fiscal year receive benefits from the purchase.
- If instructional software licenses are purchased after January, the district must provide an explanation within the budget description indicating how many students in the current fiscal year will benefit from the purchase.

Travel (2 CFR §200.474(a))

All travel must be preapproved by the Project Director. The Walton County School District Travel Policy will be followed once approved. Employees of the Walton County School District will be reimbursed for actual and necessary travel expenses incurred in the performance of their official duties. Employees will also be reimbursed for travel expenses incurred while participating in staff development activities approved by the school district. Reimbursements for travel expense will be made in accordance with the Statewide Travel Policy published by the State Accounting Office of Georgia. All travel reimbursement requests are sent to Accounts Payable for processing. The appropriate reimbursement form should be typed, signed by the employee, and signed/approved by their supervisor. Itemized detailed original

receipts should be attached to the form when appropriate. Travel reimbursement requests must be completed within 10 business days after the return to work or the expense is incurred. All reimbursements will be paid within 30 days of Accounts Payable receiving a complete, non-problematic form. Information required when requesting travel reimbursement includes:

- Itinerary of the event attended (This should include the daily schedule of the individual)
- Registration receipt
- Meal expenses
- Lodging receipt
- Mileage, airfare receipt, rental car receipt, or a description of transportation used (i.e. bus with students)
- An explanation of any unusual expenses or expenses which exceed the established limits
- Explanation of the purpose of the trip
- Account numbers
- Employee signature and date
- Approval signature and date (From each department being charged)

Only when employees travel more than 50 miles from their home or headquarters may they be reimbursed for lodging expenses. Employees who must travel shall be responsible for obtaining the lowest rate possible by avoiding the “deluxe” hotels and motels.

Eligible meals may be reimbursed on a per diem basis designed to cover the cost of the meals (including the taxes and tips), based on the number of meals per day for which the employee is eligible. While reimbursement at the per diem rate is allowable, federal programs prefer that all receipts to be attached to the travel expense report for verification and for future audit needs. Meal costs in excess of the state-determined per diem amount will not be reimbursed. Meal costs will also not be reimbursed if meals are provided as part of the workshop/conference. Travel expense reports may be selected for audit at any time and all required receipts must be retained by the employee for three years after the travel date if not attached to the expense report.

Any travel costs that are charged directly to a federally funded source must have documentation justifying that participation of the individual is necessary to the federal program.

Mileage

Mileage must be documented on a “Travel Expense Statement”. According to State Travel Regulations, “Reimbursement for business use of a personally-owned vehicle is calculated per mile, from point of departure after deduction for normal commuting mileage, based on the current reimbursement rate.”

Employees may be reimbursed for the mileage incurred from the point of departure to the travel destination but NOT for their normal commuting mileage. During the normal workweek, the point of departure will be either the employee's residence or headquarters; whichever is nearer to the destination point. If leaving from the residence you must deduct the normal commuting mileage to and from the worksite. Employees traveling by personal vehicles and requesting reimbursement must record the actual odometer readings on the expense statement. Parking fees and tolls paid may be reimbursed and employees are expected to obtain receipts for these expenses. If it is not possible to obtain a receipt, a written explanation should be included on the expense statement.

Lodging

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

- Lodging must be documented on a "Travel Expense Statement"
- Employees are responsible for making their own reservations and guaranteeing them.
- Employees are responsible for submitting a copy of the tax exemption form for state and local hotel/motel excise taxes if staying at a hotel in Georgia. Any tax paid, must have an explanation of why it was not waived. For example, "paid with personal credit card", "state does not allow" or "\$5 State Hotel Motel Fee."
- Employees must travel more than 50 miles.

Employees should use the least expensive rates for lodging. Any rates above this requires written authorization prior to the trip. Expenses must be broken down by date. Receipts are required.

Subsistence

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

- Meal reimbursement cannot exceed the following: Breakfast - \$6.00; Lunch - \$7.00; Dinner - \$15.00. Meals in Chatham, Cobb, DeKalb, Fulton, Glynn, and Richmond counties cannot exceed the following: Breakfast - \$7.00; Lunch - \$9.00; Dinner - \$20.00.
- Meal reimbursement for out of state overnight travel are generally eligible for per diem amounts designed to cover the cost of three (3) meals per day for all days on travel status other than the day of departure and the day of return. Employees are eligible for 75 percent (75%) of the total per diem rate on the first and last day of travel.
- Expenses must be broken down on the expense report per meal.
- Taxes and tips are allowed and should be included in the total. However, this total should not exceed the per meal rate.

Expenditures

Each budget is reviewed and approved by the Project Director. The budgets are input into the district accounting system (MUNIS) to match the Consolidated Ap. All expenditures require prior approval. Prior

approval is obtained by completing a requisition in the school system financial software, MUNIS.

Requisitions must include:

- Complete vendor information including phone number (and fax number if applicable)
- Ship to information including the address for the school
- Appropriate account number assigned by the system coordinator, principal or designee based on the budget sheets
- Sufficient detail to determine whether each item is allocable, reasonable, and necessary.
- If a requisition is over \$3000, three quotes must be obtained and attached to the requisition in Munis.
- No purchase or contract shall be divided into parts for the purpose of avoiding the above requirements.

Upon completion, requisitions are sent electronically to the Project Director who reviews the requisition to assure that the purchase is included in the Schoolwide/School Improvement Plan/Equity Plan and that the expense is allocable, reasonable, and necessary. If approved, the Project Director then signs off on the requisition which forwards the requisition to the Finance Department for approval and conversion to a purchase order. If rejected by the Project Director or by Finance Department personnel, a reason for rejection is entered into Munis and is then visible at the system level. The Chief Financial Officer issues final approval and Munis then automatically sends the approved purchase order to the originator of the requisition/purchase order (the 21st Century Community Learning Center Administrative Coordinator) to place the order. When the ordered item arrives, the 21st Century Community Learning Center Administrative Coordinator reviews what is received with what was ordered and “receives” the item or items in Munis. Any disputes are reconciled between the 21st Century Community Learning Center Administrative Coordinator and the vendor.

The following procedures will be used for Invoices:

- Receipt of Invoice: Invoice is received by district receptionist and forwarded to Account Payable Specialist.
- As stated above the 21st Century Community Learning Center Administrative Coordinator will match the order as he or she receives it with the purchase order and will “receive” it in the financial software. The purchase order cannot be paid unless the item is received in the system.
- The Accounts Payable Specialist compares vendor invoices to purchase orders. If these items match, the invoice is entered as an accounts payable. If not, the Accounts Payable Specialist alerts the 21st Century Community Learning Center Administrative Coordinator or the Project Director who work together to determine a solution.

- The Accounts Payable Specialist charges the expenditures to the proper fund/program designated on the purchase order by the 21st Century Community Learning Center Administrative Coordinator in the system financial software.
- If invoices received that are charged to a federal program exceed the amount of purchase orders, the Accounts Payable Specialist alerts the 21st Century Community Learning Center Administrative Coordinator who work together with the Project Director and determine a solution.
- Disbursement is not made until the invoice is validated as owned by the district and received on the system by the 21st Century Community Learning Center Administrative Coordinator
- Open purchase order reports are provided by Accounts Payable or Purchasing Specialist to 21st Century Community Learning Center Administrative Coordinator monthly and upon request to determine whether goods or services have in fact been received but not invoiced by the vendor. Contact is made with the vendor to secure an invoice if such instances are noted.

Contracted Services

At various times, district requires services that cannot be performed by regular staff personnel. The district must obtain these services by contracting with an individual for the performance of these services. There are three (3) documents required for payment for contracted (non-employee) services to occur. First, an Internal Revenue Service W-9 Form (Request for Taxpayer Identification Number and Certification) must be completed and on file in the Accounts Payable Department. Second, an E-Verify affidavit, driver's license/state issued I.D., or a Georgia Professional License Number Certificate, as appropriate, is required by state law to verify work eligibility of public contracts. Third, there shall be a written contract between the district and the independent contractor. A copy of the contract must be attached to the purchase requisition(s).

The contract should provide the following information:

- The contractor's exact legal name (this should match the IRS Form W-9).
- The contractor's address.
- The contractor's social security number or Federal Tax Identification number (this should match the IRS Form W-9).
- The date(s) of service to be performed. This should always be a future date.
- The type of services to be performed (detailed description breakdown)
- The amount to be paid. If business expenses are to be included, they should also be specified.
- The contractor must sign and date the contract.
- The superintendent or designee must sign and date the contract.

Payments to contractors are made through the Accounts Payable Department on the weekly disbursement schedule just as any other vendor. Payments made to an independent contractor in the

amount of \$600 or more in any calendar year will be reported to the Internal Revenue Service on an Internal Revenue Service Form 1099-Misc.

Transportation Plan

WCSD transportation policies are followed by the 21st Century Community Learning Center program. Bus issues follow same protocol as day school. Only the Superintendent, Project Director, or Transportation Director can approve cancellation or changes of transportation. WCSD buses may be used for the transportation of students and district personnel to and from school related activities. Buses shall not travel on private roads or driveways. Buses are approved to transport students in afterschool programs and activities. Buses are also approved to transport students from schools to Boys and Girls clubs, 4-H, and to daycare facilities within the school attendance zone. All students participating in activity trips or other school-sponsored excursions must be transported in Walton County Public Schools school buses, or, if approved by the Superintendent or his/her designee, other appropriate modes of transportation, such as common public carriers or chartered buses. The district will provide homeless students, students with disabilities, and students with limited English proficiency services that are comparable to services offered to other students in the school, including transportation services. All vehicles used and drivers employed for transportation purposes shall conform to the specifications, standards, requirements, and qualifications established by the State Board of Education and regulations of the Walton County Board of Education. Students shall receive instruction annually in safe riding procedures. Bus drivers shall read bus safety rules monthly to reinforce the safety of students being transported. In situations where school buses or charter buses are not provided, the parent/guardian shall be responsible for providing transportation. Site Coordinators are responsible for submitting student transportation lists one week before transportation is provided. *Board Policy ED/JGG*

Reporting Fraud, Waste, Abuse & Noncompliance

21st Century Community Learning Centers provide a confidential means for reporting suspected wrongdoing involving fraud, waste & abuse of and school assets or resources. Reportable activities may include, but are not limited to:

- Neglect of duty - Noncompliance with applicable rules, laws and regulations; misuse or abuse of time during work hours.
- Misuse of Property - Negligence in the care and handling of property, unauthorized or inappropriate use of property or equipment, intentional abuse or destruction of property, theft of property, or of another employee's property.
- Falsification of Information - Falsification of personnel records, time records, or any other and employee record or report.

How to report Fraud, Waste, Abuse & Noncompliance Complaints

If unsure how to proceed with a concern, contact Robin Bryant, Director of Finance during normal business hours at (770) 266-4439 for guidance prior to completing the [Fraud, Waste, Abuse & Noncompliance Reporting Form](#)

- **In person or writing:** The Finance Department is located in the Walton County Board Office at 200 Double Springs Church Road, Monroe, GA 30656
- **By phone:** (770) 266-4439.
- **Online:** Complete and submit the [Fraud, Waste, Abuse & Noncompliance Reporting Form](#).

We define abuse, fraud and waste as:

- "Abuse" means the excessive or improper use of something, or the employment of something in a manner contrary to the natural or legal rules for its use; the intentional destruction, diversion, manipulation, misapplication, maltreatment, or misuse of resources owned or operated by the locality; or extravagant or excessive use so as to abuse one's position or authority.
- "Fraud" means the intentional deception perpetrated by an individual or individuals, or an organization or organizations, either internal or external to local government that could result in a tangible or intangible benefit to themselves, others, or the locality or could cause detriment to others or the locality. Fraud includes a false representation of a matter of fact, whether by words or by conduct, by false or misleading statements, or by concealment of that which should have been disclosed, which deceives and is intended to deceive.
- "Waste" means the intentional or unintentional, thoughtless or careless expenditure, consumption, mismanagement, use, or squandering of resources owned or operated by the locality to the detriment or potential detriment of the locality. Waste also includes incurring unnecessary costs because of inefficient or ineffective practices, systems, or controls.
- "Noncompliance" means not following guidelines set forth by local, state and federal regulations and grant requirements.

Complaint Procedures Regarding the 21st Century Community Learning Center program: Please try to resolve complaints for WCSD 21st Century Community Learning Center with WCSD 21st Century Community Learning Center or the school district before moving forward on a formal complaint. For complaints about 21st Century Community Learning Center please call Anne Mitchell at 770-207-3173 for county resolution or for a copy of the complaint form. To initiate a formal complaint, a person must submit the 21st Century Community Learning Center Complaint Form to the Walton County School District. This complaint form may be obtained by contacting Anne Mitchell, Walton County School District at (770) 207-3173, or 200 Double Springs Church Road, Monroe, GA 30656. You may also contact Nathan Schult, Program Manager, 21st Century Community Learning Centers, Office: (404) 232-1197, Cell: (404) 326-3107, ncshult@doe.k12.ga.us.

Information and Communication

The Project Director attends all Federal, State, Local and 21st Century grant meetings. The Project Director is responsible for keeping the Superintendent and Curriculum and Instruction Department informed about goals, services and overall student progress and evaluation of the program. Principals receive information from the Project Director at called meetings and at principal meetings. Informally

emails are sent from the Project Director to all Site Coordinators and Principals to relay information about services, monitoring and compliance. The Project Director and Site Coordinators communicate regularly about 21st Century Community Learning Center issues and information via email, visits and meetings. Attendance at these meetings is maintained by the Projects Director.

Information about the goals, services, policies and procedures, student progress and evaluation of the program plus location, times and dates of operation will be disseminated to students and parents in a number of ways accounting for language and literacy barriers. The Site Coordinator sets up a booth at school open house prior to school opening and at parent activities after school opens. Program information such as schedule and previous year evaluation summary is dispersed, applications are available for prospective students and registration is provided for returning students. The schools, district and community will receive information about progress, successes and evaluation. 21st Community Learning Center information (including the Operations Handbook, Staff Handbook, Student / Parent Handbook, Sustainability Plan, and Program Evaluation Reports) are posted on the WCSO website.

All 21st Century Community Learning Center Site Coordinators have access to Infinite Campus where specific information about student's attendance and test scores, all grades, behavior issues, Pyramid of Intervention (POI) status, Special Education (IEP) and Educational Intervention (EIP) status are recorded. Students are marked as a participant in 21st Century Community Learning Center so the regular teacher can see a child's participation. That way a teacher knows to contact the Site Coordinator if there are specific academic or behavior issues. The Contracted Data Specialist keeps the Site Coordinator informed on specific 21st Century Community Learning Center data such as numbers, attendance and compliance on a regular basis. The external evaluator conducts regular site visits, focus groups, formal and informal surveys, and stakeholder interviews. She/he then provides results within 2 weeks. He/she provides a formative and summative evaluation report to the Project Director. These reports are submitted to the GaDOE 21st Century Department. The Project Director and Site Coordinators utilize all data collected through the above described means to make ongoing necessary revisions and/or adjustments to the program for student success.

Community Outreach

Grant award announcements and program information are made at the Walton County Partnership for Families, Children and Youth monthly meeting and the WCSO Board meeting. The Walton County Community Partnership Collaborative (Family Connections) will list the 21st Century Community Learning Center centers as a resource in all their publications and on their website, and a monthly update will be given at the Partnership meetings where members are made aware of the program and asked to encourage families to participate. This meeting has parents, community stakeholders, approximately 40 community organizations and all 21st Century Community Learning Center partners as participating members. The Project Director also reports results to the Advisory Council and school board. Newspaper articles will keep the

community informed about activities and successes. The Advisory Council will make recommendations and the final report will be released to the stakeholders; school personnel, 21st Century Community Learning Center staff, parents and partners. Copies of reports will be made available to the public at each school office. The Project Director is responsible for ensuring information is disseminated. All attempts will be made to communicate with families in students' primary language. Students and parents and other stakeholders will be informed about program services through newsletters (in students' primary language), fliers, school marquees, special mailings, the school's phone tree, district and school web pages, and other communications from the Project Director, Site Coordinators, and school administrations.

Partners and Advisory Council: 21st Century Community Learning Center is partnered with co-applicant Communities in Schools. The CIS Advisory Board serves as the 21st Century Community Learning Center Advisory Board overarching with 21st Century Community Learning Center Site Team Subcommittees underneath. Other numerous community partners such as FISH and The Partnership for Families, Children, and Youth can provide resources to assist staff in serving students.

Sustainability Plan

Through the efforts of the co-applicant, Communities In Schools of Walton County (CIS), The Partnership, and the Walton County School District (WCSD) data collection and evaluation efforts now more than ever have evidence that well thought out collaborative strategies make a difference in the families of Walton County and that afterschool programming is valuable to our students and families. See full WCSD 21st Century Community Learning Center Sustainability Plan. Also, the Partnership for Families, Children and Youth is a quasi-governmental collaborative that has been convening and coordinating efforts designed to improve the well-being of the families of Walton County since 1994. The goal is to build partnerships among organizations that advance the quality of life for families and to communicate to the community the value and potential of the combined services of the partners. Through this effort the Partnership hopes to achieve a continuum of services that address gaps in services and redirect efforts in a focused and responsive manner. Sustainability is established through system changes in service integration and delivery, partnership development, and support from partners and the community at large. In the present economic environment the Partnership recognizes it will be hard to produce new funding so the collaborative members' charge is to identify present resources and funds and to explore avenues of redirecting funds or modifying current job descriptions to better meet the needs of the community.

Subreceptients

There are no subreceptients to WCSD 21st Century Community Learning Centers.

Confidentiality

Staff will not disclose, publish or disseminate any information in any form (electronic, printed, verbal, written, etc.) that is obtained under the provisions of the Family Educational Rights and Privacy Act (FERPA) and Georgia State Statutes or developed for WCSD related to the personal information of the participants at the Community Learning Center. Staff will not use, publish or disseminate any information or work product available for personal use, nor will provide it to a third party for their use. Staff further agrees to take all reasonable precautions to prevent any unauthorized use, disclosure, publication or dissemination of any materials as stated above. In addition, failure to comply with this policy shall result in suspension or termination from employment and/or access to any and all 21st Century Community Learning Center activities in the future. All staff are trained annually on FERPA law. All staff sign a confidentiality agreement upon hiring.

Recruitment, Enrollment and Retention

The Site Coordinator promotes the 21st Century Community Learning Center program during the school's Open House Night as well as other school functions. Recruitment begins by sending invitations and applications home with targeted students. As applications are received, the 21st Century Community Learning Center Site Coordinator reviews student's records and works with the regular day to identify students for the afterschool program. Parents/Guardians are contacted via letters, emails, or phone calls regarding acceptance to the program and further details. Students may be placed on a waiting list. Site Coordinators also consult the school administration, day teachers, counselors, and special education teachers/directors to identify at risk, special education students and students receiving IEP or EIP services. Site Coordinators and day staff collaborate in order to provide appropriate accommodations for IEP and EIP students who participate in the program. 21st Century activities are offered and opened to private school students. To ensure that meaningful consultation with private school officials takes place, invitations to participate and consult with the 21st Century Project Director and staff take place prior to the program start and ongoing several times per year via receipt delivery. Each meeting is documented and has an agenda and sign-in. Private school officials submit an "Intent to Participate" form. Consultation is ongoing. No child is denied attendance based on race, color, religion, national origin, age, or disability. Regular and open communication between the Site Coordinator and parents/guardians takes place to help ensure retention and in order to optimize services for the students and families. The 21st Century Community Learning Center program will keep the program website updated the keep the community updated about the program. All materials can be made available in other languages when necessary.

ELL. Walton County School District collaborates with Walton County Chamber of Commerce, Piedmont Migrant Agency, DFACS, Walton County Family Connections, and social workers to monitor mobility, identification, and needs of the ELL population. As these students enter the school system the Home Language Survey is completed by the school to determine the language of students. All ELs are assessed annually on the state-adopted English proficiency measure with their continued eligibility for language assistance determined through a Language Assessment Conference (LAC). 21st Century hosts

ongoing activities for all parents, including parents of EL students. Every effort is made to inform the parents of EL's of ways they can assist their students academically. 21st Century follows the district's Translation and Interpretation Services Plan which guides staff in supporting parent in need of these services. Upon registration, the district asks parents to indicate their preferred language for receiving school information. To the extent practicable, communications are provided in the parent's preferred language. Resources available to translations and interpretation include Language Line, a phone based interpretation service with over 180 language options, a district-maintained list of approved interpreters (including sign language), and a contract with Carmazzi Global Solutions for professional translation of certain documents.

Parent and Family Engagement

21st Century Community Learning Centers have on-going communication to parents. A minimum of 5 parent literacy-related events shall be held each year. Parent involvement is defined as the participation of parents in regular, 2-way, meaningful communication involving learning. Site Coordinators engage in ongoing 2-way communication with parents about their child's experiences, successes, and challenges within the program. Parent events are designed to help parents who need literacy services themselves and also to help parents participate in their child's learning. Additionally, parents are always encouraged to drop-in or volunteer during the program. The goal is to ensure that parents and families receive extraordinary services and experiences that will lead to improved academic achievement.

Civil Rights

The Walton County Board of Education and 21st Century Community Learning Center does not discriminate on the basis of race, color, religion, national origin, age, disability, or in its employment practices, student programs and dealings with the public. It is the policy of the Walton County Board of Education to comply fully with the requirements of Title VI, Title IX, Section 504 of the Rehabilitation Act of 1973, the Americans With Disabilities Act (ADA), IDEA and all accompanying regulations. The Walton County Board of Education will not tolerate discrimination or harassment on the basis of race, color, religion, national origin, age, disability or by any employee or student. This policy also applies to non-employee volunteers who work subject to the control of school authorities.

Internet Guidelines for Use

The Walton County Public School System takes no responsibility for any information or materials that are transferred through the Internet. Because of the size of the Internet, many kinds of materials eventually find their way onto the system. Should a user happen to find materials which may be deemed inappropriate while using his or her Walton County Public School System Internet account, he or she shall refrain from downloading this material and shall not identify or share the location of this material. Be aware that the transfer of certain kinds of materials is illegal and punishable by fine or jail sentence. The primary purpose of the Internet connection is educational. It is essential that everyone who uses this

connection understand that purpose. Anyone using the Internet connection for non-educational purposes shall immediately log off should any significant system slow-down occur. Failure to abide by these regulations shall result in suspension of their Internet account, pending administrative review. The Walton County Public School System makes no guarantees, implied or otherwise, regarding the reliability of the data connection. The Walton County Public School System shall not be liable for any loss or corruption of data resulting while using the Internet connection. The Walton County Public School System reserves the right to examine all data stored in the machines involved in the Internet link to make sure that all users are in compliance with these regulations. No user shall use this Internet link to perform any act that may be construed as illegal or unethical, including the use of the link to gain unauthorized access to other systems on the network. The Walton County Public School System administration reserves the right to change these rules at any time without notice. The Walton County Public School System strongly condemns the illegal distribution of software, otherwise known as pirating. Any students or employees caught transferring such files through the Internet, and any whose accounts are found to contain such illegal files, shall immediately have their accounts permanently revoked. In addition, all users should be aware that software piracy is a federal offense and is punishable by fine or imprisonment

Employment

Open positions may be posted on the WCSO website. Site Coordinators may also recruit prospective applicants per program needs. Applications are reviewed by and filtered through 21st Century Community Learning Center management. All applicants, including current certified teachers, are required to fill out an application and submit necessary paperwork for hiring. Site Coordinators interview potential candidates and then refer them to the 21st Century Community Learning Center Human Resources Representative for application. By Walton County School District policy, **all applicants, contractors and volunteers** have a **national background check** and receive HR training before working with students. **Only** eligible applicants with **clear checks** or passed BOE approval are **employed**. **Internal (current Walton County School District) applicants** complete an internal hire packet which includes application, 21stCCLC policy documents, and the national background check form. Day staff may not start working in 21st Century Program until clearing the initial national background check. Additionally, all employees of the 21st Century Program must undergo an **annual national background check**. In the event the criminal record check reflects the employee or volunteer has been charged with, pleaded to or been convicted of an offense other than a minor traffic violation, at the recommendation of HR the Superintendent shall bring the matter to the Board of Education at its next meeting or sooner, if warranted, for a decision. If the Superintendent elects, the employee may continue in the employment of the school district pending final Board decision. All offenses not previously cleared by the Professional Standards Commission will be reported to the Professional Standards Commission. The employee will be required to provide documentation of all offenses previously cleared by the Professional Standards Commission.

Mandated Reporter

All 21st Century Community Learning Center employees are mandated reporters. If any complaints of rape, sexual assault, child sexual abuse, or other crimes are received, these complaints should be immediately forwarded to Student Services, who will contact the appropriate child protective agencies and/or law enforcement authorities. Failure to report suspected criminal acts as required by law by any employees could result in disciplinary action.

All employees are required to report known or suspected cases of child abuse, neglect, or dependency and, to the extent possible all acts alleged to have been committed by any adult against a child that would constitute abuse, neglect or dependency if they were perpetrated by a child's parent, guardian, custodian or caretaker. The report shall be made immediately at the time the employee becomes aware of or suspects that a child has been abused or neglected or is a dependent child. The employee shall make the report to the school counselor or to an administrator. If the school counselor and administrators are not in the building, the report shall be made to the 21st Century Community Learning Center Site Coordinator or to the Project Director. After the report is made verbally, the employee shall follow up the verbal report in writing. The Site Coordinator shall also report the information to the principal. Information regarding suspected cases of abuse, neglect, or dependency is confidential; therefore, employees must use discretion in discussing suspected cases with other employees. Such information should be discussed with other employees only when necessary to promote the best interests of the student. The employee must not discuss the information with non-21st Century Community Learning Center personnel except as required by law or authorized by the employee's immediate supervisor. DFCS is required to obtain more information from mandated reporters. Employees shall not conduct an investigation but shall gather enough information for DFCS to make a response determination. If an employee suspects immediate danger for the child or the child is afraid to go home, the employee shall inform the Site Coordinator or Project Director, who shall contact Student Services.

Professional Learning

Formal and informal methods will be used to gather systematic feedback from all participants to guide staff development and training needs. **All staff** must attend an **initial 21st Century**

Community Learning Center orientation covering the following items:

1. 21st Century Community Learning Center goals and objectives;
2. Review of Staff Handbook
3. responsibilities and guidelines for 21st Century Community Learning Center staff;
4. techniques for positive behavior management;
5. techniques for effective instruction; and
6. 21st Century Community Learning Center Policy and Procedures.

A staff needs assessment will be conducted. A plan will be developed around this assessment. Regular staff meetings will be held. One of the purposes of meetings is to survey staff for development needs,

evaluate needs, and organize needed professional development. Training for staff, partners, and parents will be organized by the Project Director and Site Coordinators. Project personnel will be encouraged to participate in school district professional development opportunities that are relevant to their needs. The district's Staff Development Coordinator will work closely with the Project Director to meet the needs of the staff. Project Director and/or Site Coordinators will attend state and regional 21st Century Community Learning Center meetings. The **Staff Professional Development Plan** will be developed and included in the Staff Handbook each year. Professional Development specific to 21st Century Community Learning Centers and effective after school programming will be implemented.

Staff Evaluation and Actions

All classroom instructors will be observed by Site Coordinator at a minimum twice a year. All classroom instructors and Site Coordinators will be evaluated by direct supervisor mid-year and annually with the 21st Century Community Learning Center evaluation form and procedures contained on the form, locally developed instruments. Administrative and service area personnel will be evaluated using the appropriate procedures and instruments developed by the Walton County School District Human Resources. If instructors are not performing satisfactorily the Site Coordinator meets with the instructor outlining what needs to be improved and how to make those improvements. The instructor is reevaluated within 20 days. If the instructor has not improved they are dismissed from the program. A record of classroom observations and evaluations and any performance documentation will be maintained by the Site Coordinator.

Cell Phones Usage – Staff and Student

Cell phones are to be turned off or placed in the vibrate mode during the program. **Neither Staff nor Students are not to have cell phones out during instruction unless the phone is being used for instruction purposes.** Staff members will not be called to the school telephone except in cases of emergency. In cases less urgent, the office staff shall relay a message. Staff Emergency Contact information is kept on file in the Site Coordinator’s office and in the front office.

Emergency

Each teacher shall have an emergency envelope near the doorway of his/her room with a copy of the School Safety Plan, a current class roll, class schedule, student medical information. This folder should also include a copy of the emergency communication information (who contacts whom if there is no intercom available). Information shall be updated regularly and staff shall take the envelope with you anytime you leave your classroom with your class. Refer to your emergency procedures chart for further information. Each classroom must have a copy of the Walton County Safety codes flip chart. Staff shall review these safety codes and place the flip chart with your emergency folder. Each classroom must have a fire drill evacuation route map posted near the classroom door and one in the emergency

envelope. At least 6 emergency drills shall be conducted during program hours each school year and include fire, weather, and lockdown. Procedures for drills are outlined in detail in Staff and Parent/Student Handbooks.

Field Trips

Pre-approval is required for field trip expenses. The Site Coordinator shall work with the Project Director on the approval process. Permission Slips with parent contact numbers are to be collected. Prior to leaving campus for a field trip, cell phone numbers are to be shared between the field trip staff/chaperones, the Site Coordinator, an administrator and the Project Director. Staff shall follow the procedures below if ANY field trip emergency arises.

1. Call the Police or an Ambulance;
2. Call the School or if it is after school hours, contact an administrator and Project Director immediately;
3. Call parent(s) - Refer to permission slip for contact numbers;
4. Stay with the child at all times. One teacher should be designated to accompany the student to a hospital if necessary;
5. The teacher should stay until a parent arrives
6. If returning to school with the student, a teacher should escort the student to the parent with a brief and factual explanation of the occurrence.
7. Any hostile parents should be directed to an administrator or Project Director.
8. Documentation of the incident should be made with the school administrator

Sexual Harassment

It is the policy of Walton County School District to provide an environment that is free from sexual harassment of any kind. This policy is taken very seriously and applies to all members of the school system, including employees and students. Complaints should be reported immediately. Walton County Schools will not tolerate sexual harassment of its students or employees by non-school personnel in programs sponsored or supported by the system as well. Persons found to be in violation of this sexual harassment policy shall be subject to disciplinary action which may include for employees, but is not limited to, written warning, demotion, transfer, suspension or dismissal. Violations of student discipline is found in the Code of Conduct. Complaints against non-school personnel shall be forwarded to the appropriate law enforcement agencies. **Legal Authority:** Sexual harassment is a form of sex discrimination which is prohibited by Title VII of the Civil Rights Act of 1964, and by Title IX of the Education Amendments of 1972. **Definition:** Sexual harassment includes, but is not necessarily limited to, conductor speech which entails unwelcome sexual advances, requests for sexual favors, taunts, threats, comments of a vulgar or demeaning nature, or demands which are intimidating or create a hostile environment for a student or employee, as well as physical contact. There may be other speech or

conduct which employees or students experience as illegal harassment which should be reported also; harassment can take many forms and it is not possible to itemize every aspect of the harassment forbidden by this policy. **Non-Reprisal:** No faculty, administrator or staff, applicant for employment, student, or member of the public may be subjected to reprisal or retaliation for action taken in good faith to seek advice concerning a sexual harassment matter, to file a sexual harassment complaint, or to serve as a witness or as a panel member in the investigation of a sexual harassment complaint. Walton County Schools will take appropriate and immediate action to respond to any retaliatory conduct. **False Accusations:** A complainant whose allegations are found to be both false and brought with malicious intent will be subject to disciplinary action, which may include for Walton County Schools employees, but is not limited to, written warning, demotion, transfer, suspension, or dismissal, and for student appropriate forms of discipline as found in the Code of Conduct. **Responsibility:** Individuals who are aware of or have experienced an incident of sexual harassment should promptly report the matter to one of the officials designated to receive informal or formal complaints. An initial course of action for any person who feels that he or she is being sexually harassed is for that person to tell or otherwise inform the harasser that the conduct is unwelcome and must stop. However, in some circumstances this course of action may not be feasible, may be unsuccessful, or the individual may be uncomfortable dealing with the matter in this way. To encourage persons experiencing alleged sexual harassment to come forward, Walton County Schools provides open channels of communication and both informal and formal complaint resolution procedures. Most complaints are handled informally, however informal procedures are optional, and complainants can choose to bypass them, discontinue them, or initiate a formal complaint while using them. The purpose of dealing with a complaint informally is to stop the offending behavior and to resolve the matter as expeditiously as possible. Complainants are encouraged to put their complaints in writing, although this is not required for informal or formal complaints. Students should be strongly encouraged to report known or suspected sexual harassment which they have observed or heard about. Employees must report known or suspected sexual harassment. Failure to do so could result in disciplinary action from school administration and potential personal liability. **Information, Counseling, and Informal Resolution:** Anyone may seek advice, information or counseling on matters related to sexual harassment without having to lodge a formal complaint. Persons who feel they are being harassed, or are uncertain as to whether what they are experiencing is sexual harassment, are encouraged to talk with their principal or designee or department directors. Students may seek advice or information from the school counselors or social workers as well. At this stage of the informal resolution process, the person seeking information and advice will be counseled as to the options for action available under this policy. To the extent possible, information disclosed through this advising process will be held in confidence unless and until the initiating individual agrees that additional people must be informed in order to facilitate a solution. The aim of informal complaint resolution is not to determine whether there was intent to harass but to ensure that the alleged offending behavior ceases and that the matter is resolved promptly at the lowest possible level. In attempting to resolve a complaint informally,

the principal or designee or department director receiving the harassment complaint may interview the alleged harasser, inform the alleged harasser of the complaint, question the alleged harasser about the alleged incidents, review Walton County Schools sexual harassment policy with the alleged harasser, and inform the alleged harasser that he or she must immediately stop any harassment that is ongoing or face swift disciplinary action. Written documentation will be kept of informal complaints as well as how the complaint was handled, but not in permanent files. This written documentation will be stored by the principal or director involved in the complaint.

Formal Complaint Resolution

The filing of a written complaint is requested, although not required, for a matter to be formally investigated and a determination made as to whether this policy prohibiting sexual harassment has been violated. If the complaint is oral, the person receiving the complaint shall promptly prepare a written statement of the complaint and shall have the complainant read and sign the statement if it accurately reflects the complaint made. Complainants wishing to file a formal complaint are encouraged to file their complaints within 90 days following the alleged incident of sexual harassment with their principal or designee or department directors to enable school officials the opportunity to deal with the allegations promptly and equitably. Formal complaint resolution procedures include conducting a thorough investigation that results in a formal written report of the investigator's findings of facts, conclusions, and recommended action to resolve the complaint. In this type of procedure, not only are the parties of the complaint interviewed but witnesses and other third parties also are interviewed. The alleged harasser will be informed of the allegations, the identity of the complainant, and the facts surrounding the allegations. The alleged harasser will be given an opportunity to respond to the allegations and evidence provided by the complainant and/or alleged victim, and to provide a statement of the facts as perceived by the alleged harasser.

Formal complaints should be reported to the following persons:

1. Complaint involving a Student. All formal complaints of sexual harassment involving a student, whether the complainant or alleged harasser, should be given to the appropriate principal or designee or department directors, preferably in writing, who will forward the allegations to the Title IX coordinator for Walton County Schools. Once the Title IX coordinator is aware of the allegations, he/she will immediately inform Student Services of the complaint, and the investigation will be conducted jointly.

2. Complaint involving an Employee. All formal complaints of sexual harassment involving an employee, whether the complainant or alleged harasser, should be given to the supervisor of the alleged harasser, preferably in writing, who will forward the allegations to the Title IX coordinator for Walton County Schools. The Title IX coordinator will coordinate a team to investigate the allegations. If for some reason the complainant is uncomfortable reporting the allegations to the principal or designee, department director or supervisor, the complainant may report their concerns directly to the Title IX coordinator.

Time Limits and Appeals

1. The investigative team shall have fifteen (15) work days to complete the investigation and prepare a written report to the complainant detailing any action to be taken in response to the complaint and the time frame in which such action will be taken and copies of this report shall be furnished to the complainant, the appropriate principal or designee, and the department director.
2. If the complaint is not resolved at the conclusion of the fifteen (15) day period or if the complainant is not satisfied with the resolution of the complaint, the complainant shall have the right, within five (5) work days of receiving a copy of the written report, to have the complaint referred to the Superintendent of schools.
3. The Superintendent shall have fifteen (15) work days to review the complaint and report of the investigative team and attempt to resolve the complaint. The Superintendent shall furnish to the complainant a written response setting forth either his or her approval of the action recommended by the investigative team or the action to be taken by the system in response to the complaint in lieu of that recommended by the investigative team and the time frame in which such action shall be taken.
4. If the complainant is dissatisfied with the response by the Superintendent, then the complainant shall have the right, within fifteen (15) work days of the receipt of the written response of the Superintendent, to have the complaint referred to the Board of Education. In order to have the board review the Superintendent's decision, the complainant must file with the Superintendent a written statement setting forth the reasons he or she disagrees with the response of the Superintendent and the action the complainant is requesting the system take. The complainant shall also include in the written response a request that his or her complaint be referred to the Board of Education.
5. Within thirty (30) work days of receipt of the written request of the complainant, the Superintendent shall present the matter to the Board of Education at its regular meeting or at a special meeting called for that purpose. The Board shall review the original complaint, the report of the investigative team, the response of the Superintendent, and the response of the complainant. In addition, the Board may, but is not required to, hear directly from any individuals with knowledge of any relevant facts relating to the complaint.
6. The Board of Education will either uphold the recommendation of the Superintendent or require the system to take some other action in response to the complaint. A copy of the action of the Board will be furnished to the complainant, either as a part of the minutes of the Board of Education or as a separate written statement. The Board shall be the final reviewing authority within the system.
7. This policy is not intended to deprive any employee of any right they may have to file a grievance pursuant to any other policy of the local Board of Education. This policy is not intended to provide an alternative process for resolving evaluation and employment disputes where there already exists a due process procedure mandated by state law or State Department of Education regulations, specifically including, but not limited to, hearings to be conducted pursuant to the Fair Dismissal Act of Georgia. The

complainant retains at all times the right to contact the Office of Civil Rights and/or the Equal Employment Opportunity Commission with regard to any allegations that the system has violated the statutes described above.

8. The school system shall be responsible for distributing and disseminating information relevant to this policy and procedure to students, applicants for employment and employees through appropriate procedures.

Policy Distribution and Training

This policy will be provided to all employees every year through trainings implemented by the Human Resources Department.