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## OVERARCHING REQUIREMENTS FOR ALL FEDERAL PROGRAMS

### **Section 1 – Monitoring of Schools and Programs**

Overview of monitoring Title I, Part A; School Improvement 1003(g)(SIG); Title I, Part C; Title I, Part D; Title II, Part A; Title III, Part A; Title IV, Part B; Title IX, Part A-McKinney Vento Act; IDEA and any additional federal grants awarded.

The Georgia Department of Education requires that Miles Ahead Charter School monitor the implementation of Federal Programs and the expenditure of all funds associated with the program. The specific requirements are as follows:

Miles Ahead Charter School will accept funds from IDEA. Additional federal funds will be accepted as awarded.

Miles Ahead Charter School Program Directors will undergo training from GaDOE and other sources to maintain proficiency in program compliance requirements.

Miles Ahead Charter School Program Directors will provide technical assistance to the school.

Miles Ahead Charter School Program Directors' self-monitoring will include monitoring all program expenditures to verify that all program expenditures comply with program requirements.

Miles Ahead Charter School Program Directors will maintain all documentation the Local Educational Agency (LEA) may need for future auditing/monitoring according to the LEA Monitoring Form, which is issued annually by GaDOE.

LEA will undergo monitoring by GaDOE over a three-year cycle. LEA/Program Director will participate in training and technical assistance updated as provided by GaDOE prior to monitoring visit.

Every Student Succeeds Act (ESSA) requires the State Educational Agency (SEA) to monitor the implementation of program requirements and the expenditure of Federal Funds. Georgia's monitoring process consists of four major components.

1. Monitoring of Expenditures – LEA must submit for approval an annual budget through the Consolidated Application Process. Program Specialists review each application and budget to ensure that expenditures are appropriate for the program area before approving LEA budgets.
2. Single Audit – An LEA with single audit findings is flagged for technical assistance.
3. On-site Monitoring – An LEA on -site Cross-Functional Team visits an LEA to apply the criteria included in the *LEA Monitoring Form*.
4. Self – Monitoring Checklist – An LEA not receiving an on-site visit complete appropriate checklist and submit it to the Georgia Department of Education as required.

### **Communication and Monitoring**

Monitoring of districts is a critical component of ensuring that compliance is taking place at each school.

Monthly meetings are also held with leadership staff, which include the status and updates of Federal Programs. The Program Director utilizes phone calls, emails, meetings, and meeting minutes to monitor the programs and personnel. Specific budgetary items are discussed with the director of Finance, Chief Academic Officer, and Staff. Monthly reports are generated by the Finance Manager and reviewed for accuracy by the Program Director. Monthly payroll reports are generated by the Finance manager and verified by the Program Director. The COO approves all monthly payroll for the personnel and then it is approved by the Federal Program Director before final authorization is complete.

### **Onsite Monitoring Procedures**

All Federal Programs are subjected to on-going monitoring by the Federal Program Director and Special Education Director throughout the school year. Directors are located on-site and conduct frequent face-to-face visits and meetings. Feedback is also provided to the Program Directors. In addition, emails, meetings, and phone conversations take place throughout the year as a means of providing on-going monitoring and communication with sites.

### **Timeline for Monitoring of Federal Programs**

- August–May: The Federal Program Director and Special Education Director review the plans and the budgets to ensure that funds are being spent according to the plan and the plan has all the necessary components. Payroll is checked monthly, and the budget is reviewed monthly.
- June: Federal Program Director, Special Education Director and other Program Directors will attend the Federal Programs Conference to provide updates on any new guidelines and to provide guidance for IDEA.
- June: CLIP review.
- July: Submit CLIP
- August: Submit budget. Beginning of Year Inventory check.
- September –October: Annual meeting held.
- December: Submit budget amendment if needed. Collect first periodic certifications.
- January: Periodic Certifications completed. Middle of the Year Inventory check, check budget.
- February–March: Prepare and post surveys.
- March: Review data and survey for parents and staff. Conduct Needs Assessment.
- April-May: Review CLIP and Needs Assessment Plan.
- May: Final budget amendment for IDEA. Final revision of Districtwide Improvement Plan. Second Periodic Certification completed.

### **Monitoring of Neglected & Delinquent Facilities**

There are no facilities for neglected students in Miles Ahead Charter School.

### **Data Analysis**

Data review for Miles Ahead Charter School is compiled and discussed during administrative meetings and at the Board Meetings. Miles Ahead Charter School's Leadership Team meets regularly to analyze data with the intent of improving instruction. Leadership Team Members discuss this information with all staff to ensure that they fully understand the data presented. Miles Ahead Charter School also has a systematic process for staff to review and analyze data.

### **Results of Technical Assistance**

The Federal Program Director and the Special Education Director maintain a file of training and communication throughout the year which includes all staff training, handouts, meeting agendas, meeting notes, etc. Ongoing monitoring of the program is conducted by the Federal Program Director and Special Education Director to ensure compliance.

### **Equipment Inventory**

Inventory of all equipment and property, as defined by federal law, belonging to any Federal Program as well as items purchased with federal funds that can easily be pilfered will be identified and inventoried on an annual basis. Items identified to be inventoried will be labeled and will be verified by a designee of the building-level or program administrator each year. The completed and signed inventory is submitted to the Director/Coordinator of each Federal Program. Materials purchased for use in Federal Programs are to be utilized in the capacity for which they were purchased. Any equipment, materials and/or supplies purchased with Federal Funds are considered solely for the use of that program.

Federal Inventory is documented in a database that is updated each time equipment is purchased. All Federal Property is identified by a specific label or marking. The database includes a description of the item, serial number, FAIN number, vendor name, and date of purchase, funding, cost, school, equipment location, and current condition. Site personnel must annually verify the location and condition of the equipment and shall conduct periodic inventory reviews as provided by governing board policy.

### *Process for Monitoring Federal Programs*

The specific Program Director participates in training and updates from GaDOE and other sources to maintain proficiency in the IDEA Program's compliance requirements. The Directors receive technical assistance from Program Specialists at the Department of Education's annual Federal Programs' Conference, other program specific conferences, and regional meetings. On-going information/training to keep abreast of timelines and new guidance occurs through e-mail and phone calls with the area Program Specialists. The Federal Program Director is enabled with the necessary skills and knowledge to provide on-going technical assistance to the school staff.

The Federal Program Director begins working in early spring to collect and analyze data including various reports, surveys, and test data. RESA staff and/or outside experts may be utilized to provide data analysis workshops in addition to the on-going data analysis conducted on-site by school Administrators.

This data is utilized in conjunction with the annual needs assessments. Interpretation of this data guides academic planning, professional learning, and instructional purchases that are identified in the CLIP.

All Federal Program expenditures will be monitored by Miles Ahead Charter School's Program Director to verify that each program's expenditures comply with program requirements and that correct requisition procedures have been followed. Monthly reports from financial are requested expenditures and verify that the appropriate personnel are coded and paid from the IDEA budget.



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In addition, the Director will conduct on-site checks to ensure the purchases have been made and are being utilized in accordance with the budget submitted.

The Federal Program Director will monitor Miles Ahead Charter School's federal programs through face-to-face technical assistance meetings, as well as, completion of the periodic certifications, equity plan, migrant implementation plans, and notices to parents. Technical assistance is provided with the leadership team for instruction about the results. Federal Program updates and technical assistance are provided to the system administrators during administrative/leadership team meetings.

**ON-SITE PROCEDURES:** Following the Federal Programs Conference provided by GaDOE, program directors discuss updated information related to Federal Programs. Emails serve as calendar reminders for item due dates and completion of IDEA documentation. Departments are provided with technical assistance throughout the school year and by a variety of means which include meetings, phone calls, emails, etc.

#### *Procedures for Identification of High-Risk Schools*

Miles Ahead Charter School is a one school LEA and is currently not identified as a High-Risk School. In the event Miles Ahead Charter School is identified as a High-Risk School, procedures will be established by the school administration with direction from its Governing Board and input from stakeholders.

#### *Process/Procedure for Follow-up/Verification of Implementation of Required Corrective Action*

**System Level Process/Procedure:** After the on-site cross functional monitoring visit, the LEA will receive a comprehensive monitoring report which will contain recommendations, findings, and required actions. If a corrective action plan is required, the Federal Program Director will respond in a timely manner and submit the appropriate documentation to the appropriate office. Implementation of the corrective action plan will be monitored by the appropriate personnel.

#### *Process for Monitoring Expenditure of Funds*

All expenditure requisitions are submitted to the Federal Program Director for approval or rejection. The Federal Program Director will requisition to determine if the expenditure is allowable or unallowable based on program requirements and regulations, the annual needs assessment, CLIP, and budget. The director will then assign the function and object code for the purchase by referring to the budget sheets for each Federal Program on the consolidated application budget pages and submits the requisition to the Financial Director.

The Federal Program Director collaborates with the appropriate staff to ensure that all technology equipment and items purchased with federal funding are necessary and allowable according to identified needs and budget restrictions. The items purchased with federal funds that have a useful life of one or more years are tagged and inventoried.

In the years when the system is not monitored by the Cross-Functional Monitoring Team, the Federal Program Director will complete a program specific Self-Monitoring Checklist and submit it to the correct department of GaDOE as required. Miles Ahead Charter School will follow the three-year cross functional monitoring schedule as published by GaDOE. The Federal Program Director and other appropriate staff members participate in state and regional monitoring training and technical assistance sessions that are held face-to-face and/or online.

**BUDGETS:** The Federal Program Director works with the Finance team to review monthly budget status sheets, the budget submitted through the consolidated application, as well as periodic payroll reports. These are used to monitor expenditures and verify that the appropriate personnel are coded and paid from federal

budgets.

**DATA ANALYSIS:** Miles Ahead Charter School utilizes a variety of means to provide a visual representation of data.

**Action Plans:** The Program Director presents data to the Board at a fall meeting each school year and provides a summary of all test data for board members. During the summer, administration personnel analyze progress toward CCRPI goals and the schoolwide plan. The data is reviewed with parents and community stakeholders ongoing. The stakeholders offer suggestions and approval of the CLIP implementation plans. The action plans describe critical issues, goals, timelines, and strategies for implementation.

**FEEDBACK ON SCHOOL IMPROVEMENT PLANS:** A minimum of two meetings are held to discuss and obtain stakeholder feedback regarding Miles Ahead Charter School's school improvement plans. Discussions in the first meeting include what is required for the development update and addition to the plans as related to the Schoolwide Program Checklist.

**MONITORING:** The Program Director meets with the staff, when appropriate, to discuss Federal Program budget expenditures and other requirements. The plans are reviewed, and a schoolwide checklist is provided to ensure all requirements of the program have been met.

There is continuing feedback between the Program Director, school leadership and GaDOE through emails, phone calls, on-site visits, and meetings.

**Needs assessment:** The needs assessment is provided by the annual needs assessment process provided through various methods and includes the data revealed from analysis of the Georgia Milestones Assessment System, and specific student needs. Schools must develop action plans for the areas in need of improvement and then plan expenditure accordingly.

**REQUISITION PROCESS:** The Federal Program Director approves the federal program budgets. The budgets are submitted and approved by the state. Miles Ahead Charter School adheres to the Internal Controls listed below:

- Submitting the requisition to the Program Director.
- The Program Director double-checks the account number with the approved school budget and the descriptions placed within the approved budget on the consolidated application.
- The Program Director forwards the requisition to the Finance team to sign and check the purchase against the budget submitted through the consolidated application.
- The Finance team forwards the requisition to the Finance Manager for the final signature.
- At this point, a purchase can be made.

Miles Ahead Charter School uses the GaDOE chart of accounts and Grant Accounting Online Reporting System (GAORS) to plan, budget, expend, and drawdown funds.

## **Section 2 – Comprehensive LEA Improvement Plan (CLIP)**

### Procedure for review and approval process for LEA Plans (CLIP)

The Comprehensive LEA Improvement Plan (CLIP) is updated annually using prior year data and needs assessment information. The CLIP serves as the plan detailing coordination of various Federal Programs and identification of needs and in turn budgeting for such needs with federal funds. Miles Ahead Charter School will ensure all stakeholders, including staff, families, and community members can be involved in the revision process. Parents and families can provide input during meetings, surveys, through review of the CLIP available at the school and through the school's webpage. Miles Ahead Charter School conducts multiple surveys each year that allow parents and families to provide input. Parent and family input is examined and considered from these surveys. Documentation includes sign-in sheets, agendas, meeting minutes, emails, and returned plan. Input is also sought from school leaders and staff members through meetings held in the Spring/Summer. The Executive Director gathers all input and updates the Consolidated Action Plan. The plan is submitted to the Chief Academic Officer for final approval. The schoolwide plan is posted on the school's website and continues to be a living document as the year progresses.

### Resolution Procedures for Unapproved Plans

If GaDOE requests revisions, the Executive Director retrieves the requested changes from the Audit Trail in the GaDOE portal. The Executive Director then ensures that requested changes are completed in the consolidated application. The Executive Director then resubmits the CLIP and requests approval from the Chief Academic Officer. This process is continued until the system's CLIP has been approved by GaDOE.

### Process for Submitting Revisions

All amendments to any documents are approved by the school's administration and Executive Director.

### Comprehensive Needs Assessment Procedures

Miles Ahead Charter School conducts an annual needs assessment. The process includes collection and examining information about the school and then utilizing that data in structured decision making that will determine priority goals, develop a plan, and allocate funds and resources. The needs assessment is conducted by gathering school data, surveys, and meetings with stakeholders.



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**Section 3 – Private Schools: Services to Eligible Private School Children**

As a State Commissioned Charter School, Miles Ahead Charter School is not required to provide services to students enrolled in private schools. If Miles Ahead Charter School begins to serve private school students, this handbook will be amended to reflect all requirements for services to private school children.

FIDUCIARY RESPONSIBILITY

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#### **Section 4 – Maintenance of Effort (MOE), Comparability, Assessment Security**

##### *Procedures for determining maintenance of effort (MOE), including funds to be excluded from MOE calculations*

GaDOE compares the fiscal effort of the preceding year to the second preceding fiscal year and makes the maintenance of effort determination available to the system through a marked “met” or “unmet” on the consolidated application. Documentation for MOE is only required for districts that do not meet the required maintenance of effort.

The school’s MOE calculations and allocations will be completed with coordination of the Executive Director, COO, and Special Education Program Director. The Federal Programs and Special Education Program at Miles Ahead Charter School follow all guidelines associated with the use of Federal Funds and MOE requirements. If any questions arise regarding MOE, the Executive Director, COO or Special Education Director will contact GaDOE for guidance. If the system does not meet MOE requirements, the system must lower their MOE through the exception listed. Documentation must be submitted to verify the exceptions to meet the MOE requirement before the system’s budget can be processed for approval. Miles Ahead Charter School follows the guidance set forth in 34 CFR 300.184 governing the expenditure of IDEA funds that states only approved special education and related services may be charged.

##### *Comparability of Services*

Miles Ahead Charter School is only one school and does not report comparability. If Miles Ahead Charter School begins to report comparability, this handbook will be amended to reflect all comparability requirements.

##### *Assessment Security Policy/Plan*

Miles Ahead Charter School Test Security Pan includes the following consequences for violation:

*It is the intent of Miles Ahead Charter School to administer all assessments with integrity and validity. Care is taken to ensure that all assessments are protected from any ethical violations and to maintain high program standards. Employees shall comply with Georgia Professional Standards Commission rules with regard to testing ethics. Employees who violate these provisions shall be subject to disciplinary action, up to and including termination.*

All certified staff members receive training annually on assessment procedures. Each year, all certified staff members are required to sign-off that he/she has reviewed Miles Ahead Charter School’s Test Security Plan.

## **Section 5 – Internal Controls, Expenditures, Inventory, Drawdowns, Cost Principles – All Programs**

### Allowability Procedures

Expenditures of Federal Funds: Federal Funds are utilized to provide only services that are not mandated by state or federal law to students enrolled in Miles Ahead Charter School who meet eligibility requirements for each program. The school may not use Federal Funds to supplant state or local funding and must use Federal Funds to supplement funds that would be made available from Non-Federal sources for the education of students (2 CFR Part 200, Subpart E). Expenditures are evaluated to ensure they are reasonable, allocable, and necessary.

### **Determining Allowability of Costs**

When using Federal Funds for purchasing, Miles Ahead Charter School will follow guidelines detailed in the most current federal regulations including those in EDGAR handbook as well as federal cost principals applicable to all federal programs. All costs must be allowable under the Federal cost principles and under the terms and conditions of the specific Federal award. Expenditures must be aligned with budgeted items in the approved grant application. When determining how the district will spend grant funds, the program director reviews the proposed cost to determine whether it is an allowable use of Federal Funds before obligating and spending those funds on the proposed goods and services. MACS uses the Comprehensive LEA Improvement Plan (CLIP) and Schoolwide Plans to determine prioritized needs. Source documentation is kept on file to determine allowability. Any questionable expense will be directed to the Area Program Specialist for further clarification.

### **Factors Affecting Allowability of Costs**

Miles Ahead Charter School staff must consider the following elements when determining the allowability of a cost. In accordance with the Federal cost principles, all costs budgeted and charged to a Federal grant must be:

- Necessary, Reasonable, and Allocable for the performance of the Federal award

A cost is reasonable if it does not exceed that which would be incurred by a prudent person under the circumstances prevailing at the time the decision to incur the cost was made. Reasonable means that sound business practices were followed, and purchases were comparable to current market prices.

A cost can be reasonable if it meets all the following conditions:

- Prudence was used in making the decision to incur the cost, considering the person's responsibilities to the school, its employees, the public, and the Federal Government.
- It is necessary to carry out the objectives of the grant program or is recognized as an ordinary cost to operate the organization.
- The school applied sound business practices; Federal, State, and Local law and regulations; terms and conditions of the award in making the decision.
- The price is comparable to that of the current fair market value for equivalent goods and services.

- There were no significant deviations from the established practices of the organization which may unjustifiably increase the cost.
- The school has the capacity to use what is being purchased.

**Necessary Costs:** Necessary is determined by the needs of the program. The expenditure must be necessary to achieve an important objective of the program. It means it is vital or required to meet the objectives of the grant or for the grant to be successful. Miles Ahead Charter School uses the System Improvement Plan/CLIP and Schoolwide Plans to determine prioritized needs. Source documentation is kept on file to determine allowability.

When determining whether a cost is necessary, the district considers:

- Whether the cost is needed for the proper and efficient performance of the grant program:
- Whether the cost is identified in the approved budget or application:
- Whether there is an educational benefit associated with the cost:
- Whether the cost aligns with identified needs based on results and findings from a needs assessment:
- Whether the cost addressed program goals and objectives and is based on program data:
- Allocable to the Federal award: A cost is allocable to the Federal award if the goods or services involved are chargeable or assignable to the Federal award in accordance with the relative benefits received. This means that the Federal Grant Program derived a benefit in proportion to the funds charged to the program.
- Consistent with policies and procedures that apply uniformly to both federally financed and other activities of the district:
- Conform to any limitations to exclusions set forth as cost principles:
- Consistent treatment: A cost cannot be assigned to a Federal award as a direct cost if any other cost incurred for the same purpose in like circumstances has been assigned as an indirect cost under another award.
- Adequately documented: All expenditures must be properly documented with original source documentation that is clearly written and maintained on file with accounting records.
- Documentation could include purchase orders, requisitions, invoices, travel authorizations, contracts, time and effort records, copies of checks, etc.
- Determined in accordance with Generally Accepted Accounting Principles (GAAP):
- Not included as a match or cost-share of another Federal program, unless the specific Federal program authorizes Federal costs or treated as such:
- The net of all applicable credits: Applicable credits refer to reduction of expenditures that operate to offset or reduce the expense of items allocable to the Federal award: Examples of such transactions are purchase discounts, rebates or allowances, adjustments for overpayments, or credits. All such credits received by the district relate to the Federal award shall be credited to the Federal award.

A cost is allocable to a Federal award or cost objective if the goods or services involved are chargeable or assignable in accordance with the relative benefits received.

- Incurred specifically for the award.
- Benefits for both award and other award and other work can be distributed in proportions that may be approximated using reasonable methods.
- Necessary for the overall operation of the entity and assignable to the award in accordance with their part.
- Can only charge in proportion to the value received by the program.

In summary, for a cost to be allowable under a Federal Grant Program, Miles Ahead Charter School ensures it meets all the following conditions:

- reasonable in cost
- necessary to accomplish the objectives of the grant program
- aligns to LEA prioritized needs
- bases on an identified need, concern, or area of weakness within the grant program
- appropriate under the authorizing program guidelines
- consistent with the underlying needs of the program in that it benefits the intended population of students or teachers for which the funds are appropriated
- allocable to the grant based on the relative benefits received
- authorized or not prohibited under state or local laws or regulations
- consistent with policies, regulations, and procedures that apply to all activities, including other grants and state and local activities
- treated consistently as either a direct cost or indirect cost
- determined in accordance with GAAP
- not used to meet cost sharing or matching requirements of another Federal grant (unless specifically permitted in the other program regulations).
- consistent with the terms and conditions of the grant award
- adheres to Period of Performances
- avoids conflict of interest
- follows procurement methods
- budgeted in the approved grant award
- adequately documented with appropriate supporting source documentation
- the net of any applicable credits such as rebates or discounts
- allowable under the Federal cost principles
- remains consistent with the Non-Federal purchasing procedures
- in most cases, supplemental to the core foundation program of the school (supplement no supplant)

Miles Ahead Charter School employees are required to follow these rules for charging these specific expenditures to Federal award.

*Procurement Procedure/Method of Conducting Technical Evaluations of Proposals and Selecting Recipients/Bids and Quotations Procedures*

The following steps are followed in the expenditures of Federal funds after the budget, which is part of the Consolidated Application, is approved.

- Purchase order forms are housed in the business office and are numbered and therefore cannot be copied.
- Each purchase order is submitted to the Executive Director who then approves or rejects the purchase order. Approvals or rejections are dictated by the allowable/unallowable expenditures as dictated by federal cost principles, the annual needs assessment, CLIP and budget. The purchase order is forwarded to the Director of Operations who assigns the program code, function and object code for the purchase.
- The Purchase Order is forwarded to the CFO and submitted for purchase.
- The CFO forwards the Purchase Order to the Director of Operations.



- When the purchases are received, the packing slip is checked against the original order. Packing slip is forwarded to the CFO.
- All items costing shelf life greater than 1 year are labeled appropriately and inventoried by the appropriate persons. Inventories are maintained and monitored by the Executive Director.
- Upon receipt of an invoice, the CFO matches the invoice, purchase order, and packing slip.
- The Director of Operations processes checks for payment. Checks are processed, posted to the ledger and mailed to vendors.

### **Methods for Procuring with Federal Funds**

There are five methods that must be used when making purchases with Federal funds. In some cases, these Federal methods are less restrictive than the state and local requirements, if so then the local or state requirements must be followed. In all cases, the more restrictive requirements must be followed when making purchases with Federal funds.

**Micro-Purchases (Purchases up to \$10,000):** Micro-Purchases are purchases of supplies or services using normal acquisition procedures, the aggregate amount does not exceed \$10,000. To the extent practicable, Miles Ahead Charter School distributes micro-purchases equitable among qualified suppliers. Micro-purchases may be awarded without soliciting competitive quotations if Non-Federal entity considers the cost reasonable.

**Small Purchases (Purchases between \$10,000 and \$250,000):** The Federal threshold for small purchases is \$250,000. For purchases of goods or services between \$10,000 and \$250,000 using Federal funds Miles Ahead Charter School must obtain price or rate quotations from an adequate number (at least two) of qualified sources through a “relatively simple and informal process”. Competitive bidding is a Miles Ahead Charter School discretion.

**Simplified Acquired Threshold:** One of the three following methods must be used for purchases above \$250,000 when using Federal funds: sealed bids, competitive proposals, or non-competitive proposals (sole sources).

### **Sealed Bids**

Bids are publicly solicited, and a firm fixed price contract is awarded to the responsible bidder whose bid, conforming to all the material terms and conditions of the invitations for bids, is the lowest in price. A complete, adequate, and realistic specifications or purchase description is available: two or more responsible bidders are willing and able to compete effectively for the business: the procurement lends itself to a firm fixed price contract and the selection of the successful bidder can be made principally on the basis of price. The invitation for bids must be publicly advertised. All bids will be opened at the time and place prescribed in the invitation for bids. The bids must be opened publicly. Where specified in bidding documents, factors such as discount, transportation cost, and life cycle costs must be considered in determining which bid is the lowest. Any and all bids may be rejected if there is sound documentation reason.

### **Competitive Proposals**

A competitive proposal is normally used with more than one source submitting an offer, and sealed bids are not appropriate. Request for proposals must be publicized and identify all evaluation factors and their relative importance. Proposals must be solicited from an adequate number of qualified sources. Contracts must be awarded to the responsible firm whose proposal is most advantageous to the program, with price and other factors considered.

### **Noncompetitive Proposals (Sole Sourcing)**

Procurement by noncompetitive proposals is procurement through solicitation of a proposal from only one source and may be used when using Federal funds only when one or more of the following circumstances apply:

- The item is available only from a single source. This must be documented.
- The public emergency for the requirement will not permit a delay resulting from competitive solicitation.
- After solicitation of a number of sources, competition is determined inadequate.

### **Cost/Price Analysis for Federal Procurements in Excess of \$250,000.**

Miles Ahead Charter School will make independent estimates of the goods and services being procured before receiving bids or proposals to get an estimate of how the goods and services are valued in the current market. To accomplish this, after bids and proposals are received, but before awarding a contract, the district will conduct either a price analysis or cost analysis, depending on the type of contract, in connection with every procurement with Federal funds in excess of \$250,000.

**Cost Analysis Non-Competitive Contracts:** The cost analysis involves a review of proposed costs by expense category, which includes an analysis of whether the costs are allowable, allocable, reasonable and necessary to carry out the contracted services. The cost analysis must be used for all non-competitive contracts, including sole source. When performing a cost analysis, the Director Of Operations negotiates a profit as a separate element of the price. To establish a fair and reasonable profit, consideration is given to the complexity of the work to be performed, the risk borne by the contractor, the contractor's investment, the amount of subcontracting, the quality of its record of past-performance, and industry profit rates in the surrounding geographical area for similar work.

**Price Analysis Competitive Contracts:** The price analysis determines if the lump sum price is fair and reasonable based on current market value for comparable products or services. In general, the price analysis can only be used with competitive contracts and is usually used with fixed price contracts. Total cost must be reasonable in comparison to current market value for comparable products and services.

### **Contract Administration**

Miles Ahead Charter School awards contracts only to responsible contractors possessing the ability to perform successfully under the terms and conditions of a proposed procurement. Miles Ahead Charter School considers such matters as contractor integrity and business ethics, compliance with public policy, ability to complete the project on time in accordance with specifications, record of past performance, and the contractor's financial and technical resources.

Miles Ahead Charter School will check references where possible and engage in practical activities such as checking with the local Better Business Bureau and the Secretary of State's office to ensure there are no outstanding complaints against the contractor if applicable.

Miles Ahead Charter School will award a contract to a contractor who has the appropriate experience, expertise, qualifications, and any required certifications, necessary to perform the work. Contractors should also have financial resources to sustain the project while the initial work is being completed and during each service period until he or she submits invoices of payment to the Miles Ahead Charter School as work is completed. Contractors should have the proper equipment necessary to complete the contracted work.

### **Debarment and Suspension**

Miles Ahead Charter School will not contract/subcontract with or award sub-grants to any person or company who is debarred or suspended from receiving Federal funds. The finance office will verify the status as the System for Award Management (SAM.gov) website before any procurement transaction expected to equal or exceed \$25,000 is paid with Federal funds. <https://www.sam.gov/portal/SAM/##11>

Miles Ahead Charter School may also refer to the suspension and debarment list by state:

<https://www.gsaig.gov/content/suspension-and-debarment-sites-state>

Miles Ahead Charter School maintains the following oversights to ensure that contractors perform in accordance with the terms, conditions, and specifications of their contracts. The schools are responsible to ensure that the terms, specifications, and conditions of the contract are being met. If there is a problem noted, it is the responsibility of the school to notify the Program Director regarding the situation.

The contract should include clearly defined deliverables and terms. Miles Ahead Charter School maintains a copy of the written, signed contract for services to be performed, records on the services performed, date of services, purpose of services, documentation that the contractor was not paid before services were performed, and records of all payments made to the contractor. These documents will ensure that services are consistent and satisfactorily performed as described by the contract.

### **Vendor Selection**

Vendor will be selected on the following criteria;

- the purposed price
- the reputation of the vendor and the vendor's goods or services
- the quality of the vendor's goods or services
- the extent to which the goods or services meet the district's needs
- the vendor's past relationship with the school
- the impact on the ability of the school to comply with laws and rules relating to historically underutilized businesses
- the total long-term cost to the school to acquire the vendor's good and services
- the vendor's response time and compatibility of goods/products purchased already in the district

### **Settlement of Issues Arising Out of Procurement**

Miles Ahead Charter School is responsible for the settlement of all contractual and administrative issues arising out of procurements made with Federal funds. These issues include, but are not limited to, source evaluation (analyzing information in order to assess their credibility), protests, disputes, and claims. Violation of law will be referred to the local, state, or federal authority having proper jurisdiction. The Director of Operations, Executive Directive, and/or the Instructional Leader are responsible for handling and coordinating the settlement of any contractual and administrative issues arising out of procurements.

### **Protest Procedures to Resolve Disputes**

Miles Ahead Charter School will exhaust all efforts to resolve disputes relating to procurements made with Federal funds. The protester must exhaust all administrative remedies with the school before pursuing a protest with a Federal agency. The Director of Operations, Executive Directive, and/or Instructional Leader are responsible for handling and coordinating any disputes relating to procurement.

### **Capital/Equipment Purchases**



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Miles Ahead Charter School will request prior approval from the program manager for any purchases for capital equipment as defined by federal regulations. Once prior approval is received, documentation will be attached to the budget in the consolidated application.

### **Compensation and Leave**

Federal and State guidelines regarding expenditure of Federal funds are followed, including funding utilized for personnel compensation and employee leave. Federal funds expended on personnel are monitored separately through payroll reports and timekeeping reports. Periodic certifications for Federal programs verify that duties and schedules are consistent with the positions. Periodic certification are collected twice yearly (December/January and May/June) for those federally funded staff members who are paid 100% with Federal funds. Once the signature is obtained, the Periodic Certification is attached to a payroll record for the specific period of time and kept on file. Split-funded personnel will use a timekeeping system to document the amount of time spent on Federal program duties. Other expenses are documented through purchase orders, which have been approved through the requisition process, and through travel authorizations, which are submitted through documentation including information for reimbursements on mileage and meals.

**PAYROLL:** Program Directors receive a monthly report by fund that shows the names of the personnel paid with Federal funds. The monthly report is reviewed by the Executive Director to ensure that the report matches personnel names submitted on the budget sheet. If the names do not match, an in depth review occurs and any discrepancies are resolved through payroll transfers and/or journal entries. The payroll report is reviewed monthly by the Executive Director.

### **Conflict of Interest Policy**

Miles Ahead Charter School Board of Directors CONFLICT OF INTEREST POLICY

Miles Ahead Charter School's Board of Directors adopts the following policy, which shall be effective as of the date this policy is adopted by the Board.

Section 1: Definition: (a) "Board Member" means an individual serving on the governing board of directors of Miles Ahead Charter School (b) "Board Chair" means the individual serving on the Miles Ahead Charter School governing board who has been elected and serves as the chair pursuant to the Miles Ahead Charter School bylaws (c) "Key Personnel" means individuals serving as employees or consultants for the school in a management capacity.

Section 2: Policy Statement: Board Members must demonstrate unconflicted loyalty to the interests of Miles Ahead Charter School. All Board Members and Key Personnel shall conduct their personal business and private affairs to avoid any potential or actual conflict of interest between themselves and Miles Ahead Charter School and shall take immediate and appropriate action to resolve any conflict of interest which actually arises. All Board Members and Key Personnel shall report to the Board Chair any facts or circumstances which they know, or should know, have resulted or will result in a potential or actual conflict of interest on the Annual Conflict of Interest Disclosure. The Board Chair shall have ultimate and final responsibility for determining whether a potential or actual conflict of interest exists and for enforcement of this policy.

Section 3: Avoiding Potential or Actual Conflicts: In order to avoid situations which potentially, or in fact, give rise to a conflict of interest, Board Members and Key Personnel shall not engage in any of the following activities, except as authorized by a prior, written resolution of the disinterested Directors



following full disclosure by the affected Board Member or Key Personnel.

- (1) No Board Member or Key Personnel or blood or marital relation of such individual shall accept except on behalf of Miles Ahead Charter School, any money or valuable thing because of any purchase, sale, investment or loan made by or for Miles Ahead Charter School, nor shall any person pecuniary interest in any such purchase, sale, investment, or loan.
- (2) No Board Member, Key Personnel, blood or marital relation of such individual shall obtain any loan from Miles Ahead Charter School, nor, without consent of the disinterested Board Members, hold or acquire a financial interest in any enterprise which is in competition with Miles Ahead Charter School or which to the knowledge of the individual has any business relationship with Miles Ahead Charter School as a vendor or which to the knowledge of the individual has any outstanding loan from Miles Ahead Charter School or is negotiating any such loan.
- (3) No Board Member or Key Personnel or blood or marital relation of such individual shall accept gifts, gratuities, favors, or services of any kind from any person, firm or corporation doing business or seeking to do business with Miles Ahead Charter School under circumstances in which it might be inferred that the donor's purpose was to influence the individual in the performance of his/her duties. However, a gift may be accepted under the following circumstances: (a) The gift has no more than token value; and (b) It is the normal exchange of hospitality or a customary gesture of courtesy between persons doing business together.
- (4) No Board Member or Key Personnel or blood or marital relation of such individual shall divulge to others confidential information regarding Miles Ahead Charter School or use such information for personal profit.
- (5) No Board Member or Key Personnel or blood or marital relation of such individual shall accept or maintain any position with any other business in which position would conflict or might reasonably conflict with the individual's performance his/her duties and responsibilities on behalf of Miles Ahead Charter School, without full disclosure of the Board.
- (6) Board Members must not use their position to obtain employment or special consideration at Miles Ahead Charter School, or any company with which Miles Ahead Charter School contracts, for themselves, any blood or marital relation or close associates. If a Board Member desires employment at Miles Ahead Charter School, he or she must first resign his/her duties as a Board Member.
- (7) Board Members shall avoid any self-dealing transaction as defined in Miles Ahead Charter School's Bylaws. The Board may resolve to allow for such transaction, but only after disclosure and approval in accordance with Miles Ahead Charter School's Bylaws and any other applicable governing documents.
- (8) No Board Member or Key Personnel or blood or marital relation of such individual shall engage in any other activity or take any other action not enumerated herein where the interests of the Board Member or Key Personnel may compete or conflict with the interests of Miles Ahead Charter School.

Section 4: Conflict of Interest Annual Disclosure: Each Board Member and Key Personnel, as applicable, shall submit a fully executed copy of the Annual Conflict of Interest Disclosure to Miles Ahead Charter School on or before September 1 of each school year. The Board Chair will note receipt of the Disclosures in the minutes of the board meeting and will take whatever action he/she deems appropriate to resolve any potential or actual conflicts disclosed in the Disclosures.

Section 5: Effective Date: This policy shall become effective for all Board Members and Key Personnel upon its adoption by the Board. All new Board Members and Key Personnel shall complete the Disclosure upon assumption of their responsibilities.

### **Travel Policy and Procedures**

Miles Ahead Charter School applies the State of Georgia Travel Policy established by the State Accounting Office to all travel on behalf of Miles Ahead Charter School. The following steps are used to document registration and travel expenditures:

- The employee receives permission from the Executive Director to attend a federally funded activity.
- Registration Fees, if applicable, may be paid at the school/district level or may be paid by the employee and included on the travel reimbursement form.
- After attending the activity, the employee submits a travel reimbursement form with the appropriate supporting documentation attached. This form is submitted to the Director of Operations for his/her signature.
- The Executive Director submits the completed and signed travel form to the Director of Operations.
- The Director of Operations submits the approved travel form to the CFO who enters the travel form for processing and payment.

### **Stipend Procedure**

Any stipends included in the approved grant budget are paid out through payroll processing upon receipt of supporting documentation of attendance at the approved event. The Executive Director accumulates and verifies the documentation and remits this to the Director of Operations for processing.

### **Reimbursement Procedure**

Prior approval is required for all reimbursements by completion of a purchase order designated for reimbursement and signed by the Director of Operations and Executive Director. Once the purchase order has been signed, the staff member can proceed with the activity/purchase and follow by submitting a completed reimbursement form.

### **Inventory**

#### **Miles Ahead Charter School Management of Inventory Policy and Procedure**

#### **Definitions:**

Equipment – any nonexpendable, tangible single item purchased for the school having a useful life of more than one year and a per-unit acquisition cost of at least \$5,000, as well as technology related items costing less than \$1,000 limited to pilferable items such as computers, laptops, DVD players, projectors, iPads, etc.  
Supplies – any tangible personal property not defined as equipment including, but not limited to, items such as books, desks, etc.

#### **Policy Statement:**

Miles Ahead Charter School shall, in accordance with 2 C.F.R. Part 200, maintain and adhere to the required guidelines for the management of the school's equipment and supplies.

1. Purpose

- The purpose of this policy is to provide guidelines for school officials regarding the management of the school's equipment and supplies.
- To ensure the maintenance and implementation of adequate controls for the procurement, location, custody, and security of equipment purchased with Federal, State, Local, and Grant funds. To present a uniform method of maintaining the Miles Ahead Charter School School's fixed and capital asset records, Inventory personnel and school principals are responsible for tracking, monitoring, and safeguarding all inventories within the MACS. Following all lists will increase accountability and avoid potential loss, replacement, and displacement.

## 2. Policy

- Inventory maintenance is to comply with government auditing standards to avoid penalties and reduction in state funding.
- Inventory will only be altered, removed, or destroyed with appropriate MACS Board Office approval.
- Inventory will not be loaned or rented without the Board of Directors' approval.
- Inventory purchased with categorical funds for special programs will only be transferred outside the program area with District Department approval.
- To verify inventory accuracy, a complete inventory of all classrooms and offices will be done at the end of each school year. This includes all fixed assets, critical control assets, textbooks, etc.
- MACS property can only be used for MACS business. Suppose MACS property is requested to be removed from MACS facilities to pursue job-related activities at other locations. In that case, the school principal or facility supervisor must approve a Request for Off-Campus Use of Equipment Form Equipment to be authorized for off-campus use, including audio-visual equipment, laptop computers, or other equipment required for off-site presentations or training purposes. The original document will be filed with the school inventory records to reconcile year-end school inventory reports. The requester is to keep a copy of this document for accountability purposes.

## 3. Procedures

- Categorical funds are allocated from specific monies or grants only for use by designated specialized programs.
- Disposition means the final status of an asset (e.g., sale, scrap, donation, surplus, or transfer to another school, school district, etc.) when it is removed from the inventory of assets.



- Fixed Asset (Capital Asset) means a permanent item with a life of at least three years, is tangible, and must work as an independent unit. These assets include moveable equipment, buildings, building components, land, and land improvements. Capital The asset threshold is \$1,000.00.
- Gift-in-kind means an item of tangible or intangible nature other than cash or securities. The gift can be something consumable or non-consumable.
- Inventory means property, equipment, or materials owned and its aggregated value.
- Obsolescence means that an item is no longer helpful.
- A surplus implies that the department no longer needs a thing from which it was initially obtained.
- Threshold Level means the monetary value beginning point assigned to inventory that will be tracked and maintained on an inventory system. The inventory tracking threshold is \$500.00.
- Inventory Management: Inventory personnel is responsible for the monitoring and safeguarding of inventory by the following guidelines:
  - Conduct required district inventory audits at all District locations, including warehouses, schools, maintenance facilities, office locations, etc.
  - Compile data from contracts, purchase orders, and invoices to maintain inventory records.
  - Compile and maintain inventory records for tracking, auditing, and maintaining inventory.
  - Verify that all merchandise purchased by schools and departments is processed according to the procedure.
  - Complete required reports by district, state, and federal requirements.
  - Review files to determine surplus, obsolete, and nonfunctioning inventory recommendations.
  - Complete all inventory procedures expeditiously and professionally is to MACS policy.
  - School/department employees delegated with inventory maintenance are responsible for following the guidelines.
- Gifts-in-kind: All donated items should be processed through the Inventory Control if they meet the requirements according to the “Fixed Asset Threshold.”
- Surplus inventory is intended for school use only.
- Before declaring the list as surplus, district personnel for Inventory Control should be contacted to verify whether a transfer to another school/department is appropriate.



- A checklist officially deemed as “surplus” must have a Declaration of the surplus form completed and sent to district personnel for Inventory Control with a copy to the appropriate school/department inventory contact person and the right school/department head.
  - The Purchasing Department has been authorized to sell all surplus inventories.
  - The Purchasing Department will determine when the excess property is sufficient to sell by public auction through Govdeals.net or by sealed bid. The Purchasing Department will coordinate the sale.
4. Disposition of Inventory
- At the end of each school year, all Principals shall furnish a list of all inventories that have been damaged, broken, or has no valuable life to district personnel for inventory control. They will then be reviewed and disposed of accordingly. Once documentation with the appropriate signatures verifies that equipment has been sold, donated, missing, stolen, or no longer in the system, it may be deleted via the Equipment Deletion Form (EDF).
5. Tagging
- A numbered barcode tag identifies items recorded in the equipment inventory database. The primary purposes of tagging are to provide an accurate method of identifying assets as district property, control the location of all physical assets, and provide a link to asset records for physical inventories. Upon receipt, a district asset barcode label is assigned and affixed to the items.
6. Asset Records
- Asset records shall be created for all newly acquired inventory items. An inventory database will be created and maintained to include the following information:
    - Asset Tag Number
    - Asset Type
    - Description of the Item
    - Location (building and room number)
    - Serial Number
    - Make
    - Model
    - Funding Source
    - Unit Cost
    - Purchase Date
    - P.O. Number
    - Current Status
    - Disposition
    - Disposition Date
7. Receipt & Delivery of Equipment

- Direct Shipments: Schools or facilities to which equipment must be delivered directly from the carrier to the facility (e.g., office furniture, etc.) or Technology (Computer Central Processing Units, etc.) shall notify the Purchasing Department of the arrival of the equipment to schedule a time for inventory and tagging of the equipment. The facility administrator must notify the Purchasing Department and submit an Equipment Acquisition Form (EAF) to the Purchasing Department.
  - Receipt & Delivery of Shipments: The equipment will be placed in the designated room per inventory records. This information will be included in the following inventory listing provided for the administrator in charge of end-of-year inventory.
  - Inspection: All equipment items will be visually inspected upon delivery except for equipment requiring installation by a company representative. Visible exterior damage will be noted on the shipper's delivery ticket and the Inventory copies of the purchase order. Concealed damage will be pointed out on the replica of the purchase order.
  - Partial Shipments: When partial shipments of purchase orders are received, items shall be placed on hold until back orders have been
  - received. Any requests from the purchaser to deliver partially shipped items must be documented on the inventory copy of the purchase order as a partial delivery.
8. Computer Listing of Property
- A copy of the computer listing of each building inventory will be sent to the building administrator annually. Any variations between the inventory and facility inventory shall be reported immediately to the Purchasing Department using the Equipment Acquisition Form (EAF), Equipment Transfer Log (ETL), or Equipment Deletion Form (EDF).
9. Accountability for Equipment
- The building administrator is responsible for all equipment in schools or facilities under their supervision.
10. Employee-Owned Items
- Miles Ahead Charter School School will assume no responsibility for employee-owned items. Such items must be removed when the employee ceases to be employed by the MACS.
11. Missing Items
- All missing items must be reported immediately. Upon discovery of the missing item(s), the building administrator shall notify the Security Department immediately to file a police report, request an investigation and a copy of the police report. If the item(s) are to be deleted from the inventory database, an Equipment Deletion Form (EDF) must be submitted with appropriate documentation.

## 12. Surplus Property

- Schools/Departments with items on their equipment inventory that are not being used and cannot be used in the School System may request that they be declared surplus using the Equipment Transfer Log (ETL).
- Sale of Surplus Property: The Executive Director of Operations is responsible for preparing a list of unusable items for Board approval declaring any surplus property no longer needed by the School System or where future needs do not justify cost maintenance and storage. The Purchasing Department will prepare and submit the initial list to the Executive Director of Operations for Board approval to sell surplus property. Surplus items will be sold on Govdeals.net or by sealed bid.
- Disposal of Surplus Property: no one may sell, scrap, salvage for parts, or otherwise dispose of any BOE property until all documentation has been completed and approved.
- Deletion of Property from the Database: Once there is documentation with appropriate signatures verifying that equipment has been sold, donated, missing, stolen, or otherwise no longer in the system, it may be deleted from the system via the Equipment Deletion Form (EDF).

## 13. Grants

- Equipment obtained by loan, gift, etc., in connection with state or federal grants or contracts, shall be reported as an acquisition.

## 14. Inventory of Equipment

- Equipment purchased using state or federal grant funds shall be included in the district inventory but coded separately from equipment purchased using District funds.

## 15. Accountability for Property

- In contractual agreements between the grantor and the MACS, where title to all grant or contract-furnished property remains vested with the grantor, the Board of Education will maintain accountability for this property. The equipment will be added to the school/department inventory, appear on the inventory listings, and have an inventory tag affixed. The title will be removed upon the return of the equipment to the grantor.

### **Procedures for Equipment**

Equipment purchased with federal funds will be used to support core academic subjects only. The Director of Operation's Technology Designee supervises this equipment and staff members are required to submit materials for printing, laminating, etc. The Director of Operation's Technology Designee provides information during pre-planning each year describing procedures of use for equipment purchased with federal funds. If materials are submitted by a staff member and are not to support core academic subjects, the material will be returned to the staff member.

### **Cash Management- Drawdowns Internal Controls:**



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The CFO shall receive both formal and informal training and is familiar with the Federal and State Grant Guidelines of Cash Management/Payment.

The CFO closes the books each month to ensure that the expenditures are recorded in the right month and to the correct fund source.

The CFO runs a report to determine the funds expended to for various federal programs. The CFO prepares the supporting documentation for drawdowns and forwards it to the program director and/or Executive Director who reviews the documentation and approves and signs off on the amount to be requested, which is equal to the expenditure printout minus any previous drawdowns.

The CFO or designee then creates and submits a DE0147. The supporting documentation and corresponding DE0147 is kept on file to justify funds drawn.

The Director of Operations keeps a check on balances for each grant. The Director of Operations and the Executive Director monitor drawdowns to help ensure students receive the maximum benefits of the federal program and Miles Ahead Charter School does not exceed the maximum allowable carryover per program. A monthly expenditure report by function and object code is generated by the Director of Operations for the Executive Director to monitor expended funds vs. Budgeted funds. The Board's policies and procedures help to ensure correct Cash Management activities. The organization understands the need of appropriate cash management.

Significant aspects of controls are tested as part of the Miles Ahead Charter School's annual independent financial audit conducted by the Georgia Department of Audits and Accounts or another qualified independent auditor.

Copies of the following are kept in the Director of Operation's office.

Completion reports for previous fiscal years.

Accounting records to support the results of outlays (expenditures indicated in the completion report).

**Draw Down:**

The CFO is responsible for drawing down federal funds. After the original budget is approved, the Director of Operations prepares requests for reimbursement (DE0147) in the GaDOE portal through the DAORS module based on prior expenditures. Timely drawdowns are made to help ensure Miles Ahead Charter School does not exceed the maximum allowable carryover. A report is generated for funds requested are on a reimbursement basis only. Miles Ahead Charter School requests reimbursement of funds so that excess cash balances are not maintained. In the rare event that excess balances exist, they will be promptly withdrawn and returned to GADOE.

**Cash Management Expenditures**

Miles Ahead Charter School's primarily uses checks for payment of expenditures. For vendors that do not allow check payment, Miles Ahead Charter School will use a credit card or digital transfer for purchases. A copy of the bank statement will be attached to the purchase order for financial records of expenditures purchased with federal funds.

**Procedures for Transferability**





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When funds are transferred into a program, the funds become subject to all rules and regulations of the receiving program. Miles Ahead Charter School will notify the state, in writing, of its intent to transfer funds each year at least 30 days prior to the transfer and prior to submitting the budget for approval. Each month, funds will be drawn down from the transferring program first (until there is \$0 balance) before drawing down any funds from the program receiving transferred funds.

### **Section 6 - Within District Allocation Procedures**

#### General LEA Selection and Allocation Requirements

Miles Ahead Charter School is a single school LEA and does not allocate funds within the district.

Miles Ahead Charter School is neither under a state ordered nor court ordered desegregation plan. Miles Ahead Charter School's attendance zone is coterminous with Cobb County. We adhere to open enrollment guidelines per state guidance.

Miles Ahead Charter School is not a residential treatment facility.

#### Rank Ordering and Allocation Procedures

Miles Ahead Charter School is a single school LEA.

#### Equitable Services for Private School Participants

As a State Commissioned Charter School, Miles Ahead Charter School is not required to provide services to students enrolled in private schools.

## **INDIVIDUAL FEDERAL PROGRAMS**

### **Section 7 - Title 1, Part A: Notice to Parents**

Miles Ahead Charter School will provide notice to parents of participating English Learners not later than 30 days after the beginning of the school year. For those children who have not been identified as ELs during the school year, the LEA shall notify the children's parents during the first two weeks of the EL being placed in a supplemental language program funded by Title I or Title III.

### **Section 8 - Title 1, Part A: Parent and Family Engagement**

*Meaningful Consultation with Parents, Families, and the Community*

Miles Ahead Charter School will use a checklist to ensure that required Title I documentation is completed at the required time. The Parent and Family Engagement Input Checklist provided by GaDOE will also be used for documentation.

#### *Procedures on How Parents Are Able to Provide Input on the Parent and Family Engagement Policy*

Miles Ahead Charter School will have a Parent and Family Engagement Plan. The School Parent and Family Engagement Plan is reviewed and revised annually with parents, families, and other stakeholders (teachers, administrators, and other school personnel). All Title I parents, families, teachers, administrators, and other school personnel in the school are invited to the meetings to provide input. The Federal Programs Director will be responsible for collecting the required information (agenda, meeting notes, and sign in sheets). Notifications of the meetings are sent home as a paper copy in each child's communication folder, emailed as an invitation, shared on social media, and included in the school newsletter. Also parents may review and provide feedback by viewing the plan, which will be available on the school website. The Parent and Family Engagement Policy checklist is applied to the policy. The revision date will be clearly marked on each plan. Additionally, parents and families complete surveys in the spring regarding parent and family engagement practices and activities. The Federal Programs Director will be responsible for setting up meetings and collecting required information (agenda, meeting notes, and sign in sheets).

Parent and Family Engagement workshops and activities will be planned for the following year from the annual spring survey results. Many opportunities will be provided for building strong parent capacity. The purpose is to ensure effective engagement of all parents and families and to support a partnership among the school, parents, families, and the community to improve student academic achievement through at minimum, the following activities:

- Annual meetings
- Conferences
- E-mail communications



- Phone calls
- Coffee Chats
- Celebrations of Learning
- Volunteering
- Open Houses
- Newsletters/flyers/brochures
- Website information
- Board of Education meetings

*Procedures on How Parents Are Able to Provide Input on the School Parent Compact*

Miles Ahead Charter School will have School-Parent Compacts. It is the responsibility of the Federal Programs Director to make sure that our compact is reviewed and revised annually. The review and revision will occur in the spring of the year. Revision dates will be clearly marked on the compact. Parents and families will be notified using a variety of methods of meeting dates at each site to review the school compact. The Federal Programs Director, who serves as the Parent and Family Engagement Coordinator, will collect feedback regarding compacts. Also, parents may review and provide feedback by viewing the compact, which will be available on the school webpage.

School parent compacts will include responsibilities for the teacher, parent and families, and students. Compacts will be distributed to all parties involved for signatures in the fall of the year following additional revisions if necessary. Copies of the signed parent compacts are kept on file and a copy will be maintained by the Federal Programs Director.

*Procedures on How Parents and Families Are Able to Provide Input on Building Capacity*

Information is provided to school personnel and parents on how to build parent capacity through presentations made during meetings, through response to parent needs on surveys, and through student handbooks, newsletters/flyers.

Parent and Family Engagement workshops and activities will be planned for the following year from the annual spring survey results. Many opportunities will be provided for building strong parent capacity. The purpose is to ensure effective engagement of all parents and families and to support a partnership among the school, parents, families, and the community to improve student academic achievement through at minimum, the following activities:

- Annual meetings
- Conferences
- E-mail communications
- Phone calls
- Coffee Chats
- Celebrations of Learning
- Volunteering
- Open Houses
- Newsletters/flyers/brochures
- Website information
- Board of Education meetings

*Input into the 1% set-aside for Parent and Family Engagement Activities*

Miles Ahead Charter School will develop and implement policies and procedures for the use of federal



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program set-asides for parent and family engagement activities when required under its feral program budget.

*Procedures on How SCA Provide Technical Assistance on Parent and Family Engagement Requirements*

Miles Ahead Charter School is a single school system LEA. The Associate Head of School and Federal Programs Director attends the Federal Programs Conference each year to receive updated information on Parent and Family Engagement requirements in addition to emails, webinars, newsletters and other communication from

GaDOE. Information is provided to school personnel and parents on how to build parent capacity during meetings, through response to parent needs on surveys, through information received from the GADOE Parent Engagement department, and through student handbooks, newsletters/flyers.

*Distribution of Multiple Ways and Accessibility*

Miles Ahead Charter School will distribute the School Compact and the Parent and Family Engagement Policy by sending a copy home in each student's communication folder. These plans as well as the School Improvement Plan are posted on the school website and available in the front office lobby. Input into the content of each plan is solicited during multiple meetings throughout the school year. All material are made available in an alternate language/presentation if requested.

*Development of School Parent and Family Engagement Policy/Plan, School-Parent Compact*

The School Parent and Family Engagement Policy/Plan and the School-Parent Compact will be developed to include all of the required components. Evidence of Building Capacity of School Staff and Parents Miles Ahead Charter School will maintain documentation to provide evidence that Miles Ahead Charter School is meeting the requirements for building capacity for involvement.

*Evidence of Building Capacity of School Staff and Parents*

Miles Ahead Charter School will maintain documentation to provide evidence that Miles Ahead Charter School is meeting the requirements for building capacity for involvement.

### **Section 9 - School Improvement (1003A)**

Miles Ahead Charter School is not classified as a CSI or TSI school.

### **Section 10 - School Improvement (1003G) (SIG)**

Miles Ahead Charter School is not a CSI or TSI school and does not receive School Improvement funding. In the event that Miles Ahead Charter School begins to receive these funds, this handbook will be amended to reflect all requirements for the funding.

### **Section 11 - Services for Homeless Children and Youth**

Miles Ahead Charter School will adhere to all governing board policies relating to services for students identified for assistance under the McKinney-Vento Homeless Assistance Act.

*Procedure for Education for Homeless Children and Youth*

#### **Procedure for Educating Homeless Students Identified Under McKinney-Vento Homeless Assistance Act**

##### **A. IDENTIFICATION**

Homeless children and youth will be identified through the following sources:

1. The designated Homeless Liaison will provide training to school staff during pre-planning each year in identifying students who may qualify as homeless. The information should include the importance of sensitivity in dealing with families experiencing homelessness. Staff should be provided with written materials and given opportunities to ask questions.

2. School personnel will inquire about homelessness upon enrollment of students through use of the enrollment application for the McKinney Vento Program. Information on eligibility will be shared with the Homeless Liaison for Miles Ahead Charter School. The designated Director of Student Information Systems shall be responsible for updating state reporting screens in the student data system for each eligible student with appropriate current criteria:

- 1) Code Homeless as “Yes”
- 2) Code Primary Night Shelter: 1 – Shelters: 2 – Double-Up:3 – 4: – Hotel/Motel

3. School personnel will notify the Homeless Liaison of any possible students in who are or may be homeless.
4. The Homeless Liaison will consult with community agencies to identify homeless students.

**B. SCHOOL SELECTION**

There is only one school within this LEA, so there are no requirements with regard to school selection within the LEA. Miles Ahead Charter School will support the school selection that is in the best interest of the student.

**C. ENROLLMENT AND WITHDRAWAL OF HOMELESS STUDENTS:**

- The Records Clerk or designee shall notify the Homeless Liaison when a homeless student is identified.
- The school shall provide the parent/guardian with information regarding homeless services.
- The school shall provide the parent/guardian with information regarding homeless services.
  - a. Homeless students qualify for free breakfast and lunch. To obtain free lunch for a homeless student the Parent/guardian or school must complete and sign a Student Residency Questionnaire and forward it to the Homeless Liaison to determine eligibility. If the student qualifies for free meals under the McKinney-Vento Homeless Assistance Act, the Homeless Liaison will contact the Nutrition Program about the student's immediate qualification for free lunch. Free lunch for homeless students will extend to the end of the school year
  - b. When students enroll without records (i.e., transcripts/grade reports, birth certificate, immunizations/health records) the Chief Academic Officer or designee shall
    - i. Contact the former school to request the student's records and discuss immunization information and tentative placement;
    - ii. Create a cumulative record if it is determined that the records are not available;
    - iii. Refer the student to public health and provide follow-up to ensure that the student has been immunized, if there are no immunization records;
  - c. Parents/Guardians shall provide the school with contact information.

**Withdrawal:**

Homeless students often leave school without officially withdrawing. If the school is contacted by another district for a homeless student's records, requested information shall be provided and school records sent within 10 days to the receiving school district.

**D. TRANSPORTATION:**

Miles Ahead Charter School does not provide schoolwide transportation. However, if the student continues enrollment at Miles Ahead Charter School while staying at the temporary residence, transportation will be provided to and from the school if requested by the Parent/Guardian/Caregiver/ Unaccompanied Youth. Provision of transportation assistance will be made in the best interest of the child. Requests for transportation may be made directly to the homeless liaison or the Chief Academic Officer.

#### **E. DISPUTE RESOLUTION**

1. If a dispute arises over enrollment:
  - a. The parent/guardian shall be provided with a written explanation of the school's decision, including the right to appeal.
  - b. The dispute shall be presented to the School's designated Homeless Liaison who will then consult with the Federal Programs Director.
  - c. If the matter is not resolved at that level, the family may appeal to Miles Ahead Charter School Board of Directors for a decision.
2. Once the decision has been reached, the parents/guardian shall be provided with a written explanation of the school's decision and the parent/guardian's right to appeal such a decision.

#### **F. ROLE OF THE HOMELESS LIAISON**

The role of the School's designated Homeless Liaison is to provide that:

1. Homeless student's and unaccompanied youth:
  - a. Are identified by school personnel;
  - b. Enroll in and have an equal opportunity to succeed in district;
  - c. Receive educational services for which they are eligible; and
  - d. Are referred to community agencies if other support resources are needed.
2. Parents/guardians of homeless students are made aware of educational and related opportunities available to their children and are provided with a meaningful opportunity to participate in their children's education.
3. Enrollment disputes are mediated in accordance with the McKinney-Vento Homeless Assistance Act;
4. Students who do not have immunization or medical records are assisted;
5. Collaborate and coordinate with State Coordinators for the Education of Homeless Children and Youth and community and district personnel responsible for providing education and related support services to homeless children and youth.
6. Assignment of Homeless Liaison: The Chief Academic Officer and/or Federal Programs Director will designate an employee to serve as the Homeless Liaison for students in Miles Ahead Charter School. The liaison will be familiar with community agencies and resources that would be beneficial for families experiencing homelessness.

#### *LEA Procedure for Providing Awareness & Contact Information*

The school counselor at Miles Ahead Charter School will be given posters on the educational rights of students experiencing homelessness to post at Miles Ahead Charter School. Additional posters will be housed in a communication folder. These plans as well as the School Improvement Plan will be posted on the school website and available in the front office lobby. Input into the content of each plan will be solicited during multiple meetings throughout the school year. All materials will be made available in an alternate language/presentation if requested.

#### *LEA Procedure for Providing Awareness and Contact Information*

The school counselor at Miles Ahead Charter School will be provided with posters explaining the educational rights of students experiencing homelessness that will be displayed at Miles Ahead Charter School. The posters have the name and contact information of the Homeless Liaison for Miles Ahead Charter School and the regional contact person for the Georgia Department of Education.

### **Section 12 – Services for Foster Care Children**

#### Transportation

Although Miles Ahead Charter School does not provide transportation for all students, we have contacted our local DFCS office to ensure they are familiar with our operational model, have our contact information, and have worked together to create a Foster Care Transportation Plan. We stand ready to coordinate with them to support transportation of any student in foster care if necessary, to maintain continuity at the student's school of origin.

### **Section 13 – Services for Neglected and Delinquent Children**

As a single charter school LEA authorized by the State Charter Schools Commission, Miles Ahead Charter School does not serve centers for neglected and delinquent children nor receive funding for these services.

### **Section 14 – Prevention and Intervention Programs for Children who are Neglected, Delinquent, or At-Risk**

As a single charter school LEA authorized by the State Charter Schools Commission, Miles Ahead Charter School does not receive funding for additional programs for children who are neglected, delinquent, or at-risk.

### **Section 15 – Title IV, Part A – Student Support and Academic Enrichment**

Authorized in December 2015, the Every Student Succeeds Act (ESSA) introduced a new block formula grant under the Title IV, Part A with a wide range of allowable uses. Title IV, Part A, Student Support and Academic Enrichment (SSAE) grants are intended to improve students' academic achievement by increasing the capacity of States, LEAs, schools, and local communities to:

1. Provide all students with access to a well-rounded education
2. Improve school conditions for student learning
3. Improve the use of technology in order to improve the academic achievement and digital literacy of all students (ESSA section 4101)

Miles Ahead Charter School will meet required program requirements of Title IV, Part A.



### **Section 16 – Title VI, Part B – Rural and Low-Income School Program**

Miles Ahead Charter School will not receive Title VI, Part B funding for Rural and Low-Income Schools Program. In the event Miles Ahead Charter School receives funding for the Rural and Low-Income Schools Program, this handbook will be amended to reflect all program requirements.

### **Section 17 – Title II, Part A – Supporting Effective Instruction**

The goal of the Title II-A program is for the school purpose of increasing academic achievement by improving the effectiveness of teachers, principals and other school leaders.

#### *Procedures for Ensuring an Annual Needs Assessment Is Conducted*

Miles Ahead Charter School will conduct an annual needs assessment. The needs assessment will be conducted by gathering information from school data, surveys and meetings with stakeholders. The process includes collecting and examining all information about the school/system and then utilizing the data in structured decision making that will determine priority goals, the development of a plan, and allocation of funds and resources.

The surveys will be open to all administrators, teachers and paraprofessionals. Input on areas of need for improvement is solicited from site and district leaders, community and secondary institutions, at federal program meetings and/or during monthly administrative meetings. Feedback will also be solicited from parents during the annual federal programs meetings and by the family engagement liaison staff members.

#### *Prioritization of Needs*

Internal and external stakeholders are involved in the planning process by assisting with the prioritizing of needs. Prioritization of needs is accomplished by analyzing data and reviewing the percentages on the answers to various survey questions. In addition, prioritization is discussed with stakeholders during meetings. The needs assessment data and meeting results will be discussed by the district Administration Team, consisting of the Chief Academic Officer, and various directors. The Administrative Team then combines the feedback from all stakeholders and creates a final prioritized list of needs.

#### *Procedure for Determining Effectiveness of Title II, A Funded Activities*

The Director of Federal Programs will draft the annual Effectiveness Plan based on current planned budget expenditures in accordance with school requirements. The Effectiveness Plan is revised and uploaded if a budget amendment is submitted due to a change in needs and/or a significant change in budgeted strategies. Effectiveness of federally funded activities is evaluated annually using available student achievement results, process data, and stakeholder perception data (ESEA Sec. 2101(2), Sec. 2122(b)(2); 2 CFR 2 CFR §200.328(a)). Historical and longitudinal data are reported and compared to evaluate the impact of interventions. Artifacts and evidence of implementation are collected as part of the ongoing monitoring process. This summary of program effectiveness is used to guide the development of the following year's program.

## **Section 18 – ESSA: Equity and Professional Qualifications**

### *Procedure for Developing the LEA Equity Plan*

Miles Ahead Charter School will provide evidence it is implementing an equity action plan for the two equity gaps and each corresponding equity intervention selected for improvement in each fiscal year.

### *Procedure for Ensuring Appropriate Hiring and Assignment of Professionally Qualified Teachers/Paraprofessionals*

Miles Ahead Charter School will allow for certification to be waived for content service area for teachers in grades K-5 through Miles Ahead Charter School's broad flexibility waiver as a charter school. Certification can be waived for teachers who are non-core academic teachers.

Instruction at Miles Ahead Charter School is provided by highly effective teachers and paraprofessionals who meet the requirements of Georgia. Each year, teacher certification and teaching assignments are reviewed to ensure that teachers meet the standards established by the state of Georgia. Teachers and paraprofessionals are reminded of renewal dates, procedures, and required coursework, if needed, to renew their certification. If any teacher is out of field, teaching assignments are changed, whenever possible, to meet compliance. For content field certifications, Miles Ahead Charter School will ensure the teachers have equivalent credentials if the content certification is waived by Miles Ahead Charter School. Staff members who must be out for long-term leave (e.g. maternity leave) will have their positions filled by substitutes who are certified teachers whenever possible.

Miles Ahead Charter School's Project Based Learning Coach provides an increased level of curriculum and instructional support for teachers new to Miles Ahead Charter School, new to a grade level or subject area, and at-risk teachers. The PBL Coach will also connect them with other staff members for peer observation and mentor opportunities to best fit their needs.

During the hiring process, the Chief Academic Officer will verify the educator's certification in PSC to determine if the potential employee meets the requirements for Professional Qualifications. If the potential employee does not meet the requirements, but a waiver is allowed, equivalent credentials will be determined and included in the employee's personnel file. Prior to each school year, the Chief Academic Officer will pull the out-of-field reports. For any employees who do not meet applicable federal, state, and/or local professional/certification requirements, the Chief Academic Officer will develop a plan in collaboration with the employee to ensure that necessary steps are taken to meet requirements. When applicable, Miles Ahead Charter School will provide notification to parents in a timely manner if the student has been assigned or has been taught for four or more consecutive weeks by a teacher who does not meet applicable certification/licensure requirements at the grade level and subject area in which the teacher has been assigned.

### *Procedure for Ensuring Parent Notification of Right to Request the Professional Qualifications of Teachers and Paraprofessionals*

#### Right to Know

Miles Ahead Charter School provides notification to parents on their right to information regarding a teacher or paraprofessional's professional qualifications, to include the following:

1. Whether the teacher/paraprofessional has met the Georgia Professional Standards Commission certification requirements for the grade level and subject area(s) in which the teacher provides instruction

2. Whether the teacher is teaching under an emergency or other provisional status through which Georgia qualifications or certification criteria have been waived
3. The college major and any graduate certification or degree held by the teacher
4. Whether the student is provided services by paraprofessionals, and if so, their qualifications.

Upon enrollment the system provides notification in a format that is understandable and will ensure that all parents can receive the information in multiple ways. This includes, but is not limited to, the student handbook and posting on the school website. To the extent practicable, the notification will be provided in a language that parents may understand.

#### Professional Learning Goals/Plans

Miles Ahead Charter School requires the initiation, development, and implementation of professional goals and plans for applicable staff.

#### **Section 19 – Title III, Part A – Language Instruction for English Learners (EL) and Immigrant (IMM) Students**

An ESOL program plan is designed to provide consistent and non-discriminatory procedures throughout Miles Ahead Charter School as recommended by the U.S. Office for Civil Rights, Department of Education. The Civil Rights Acts of 1964 requires local school districts to provide an alternative program of service when there are students who are limited English proficient and are unable to participate effectively in the district’s regular instructional program.

#### **Section 20 – Title I, Part C – Education of Migratory Children (MEP) Services**

Miles Ahead Charter School will identify migratory children with unmet needs to implement supplemental instructional and or support services during the regular school year and summer months using funds it received directly for such services or through the MEP consortium.

#### **Records Maintenance and Transfer**

The designated Director of Student Information Systems will obtain student records (to include academic, hearing, vision, dental, and immunization) from previous schools and should contact the Migrant Contact to assist with obtaining records when experiencing difficulty in obtaining records. The Migrant Student Information Exchange (MSIX) is to be accessed to gain information on previous school records. The Migrant Contact is to notify the MEP Consortium staff when students are withdrawn from school or change their address. Required MEP forms are to be completed by consortium staff.

#### **Identification and Recruitment**

Enrollment packages are to include the most recent Occupational Survey from the Georgia MEP. Surveys in languages other than English are also available on the Migrant Program of the DOE website. Once completed, the survey is to be reviewed by the designated Director of Student Information Systems for responses with either a “Yes” to a move within three years, or a “check” by a qualifying occupation. Surveys with either of these responses are to be scanned and emailed to the Migrant Contact who will then send the survey to either the Consortium Program Specialist or a Regional Recruiter to follow up to determine if a Certificate of Eligibility should be completed.

Upon notification by email from the Georgia Department of Education Migrant Program of New Participant Reports, the Migrant Contact is to access the reports through the MEP District Data Access on the DOE



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portal. The report is to be used to update the students as migrant in the Student Information System. In addition, the Nutrition Director for Miles Ahead Charter School is to be notified of the student's eligibility in the migrant program.

Once students reach their End of Eligibility for the Migrant Program, the Migrant Contact is responsible for mailing the letter to the parents on school letterhead. Copies of the letters are to be mailed to the Consortium Coordinator.

**Priority of Services**

Miles Ahead Charter School will follow the priority of services as determined by the MEP Consortium.

**Migrant Services Coordination**

The Migrant Contact or designated site personnel are to work with MEP Consortium personnel to coordinate services.

**Parent and Family Engagement/Advisory Councils**

Miles Ahead Charter School will participate in PAC meetings facilitated by the MEP Consortium.

**Professional Development**

Staff involved with the education of migrant students shall be given the opportunity to participate in training.

**Program Evaluation**

Miles Ahead Charter School will participate in program evaluation priorities completed by MEP Consortium.

**Section 21 – Individuals with Disabilities Education Act (IDEA) – Fiscal Indicators**

Miles Ahead Charter School will provide CEIS and High-Cost Fund documentation if applicable.

Miles Ahead Charter School will annually conduct the Excess Cost Calculation for base and final calculations and maintain documentation.

Miles Ahead Charter School will receive prior written notice when required for approval of equipment purchases with a per unit cost of \$5,000 or more.

**Section 22 – Individuals with Disabilities Act (IDEA)**

Refer to Special Education Resource Manual for all required documents and other components.



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