

Policy Development Committee Agenda

4/15/2022

7:00 A.M. ~ Gilford High School Library

Policies to Review

IKAH – Grading Disabled Students: Grades K-12

IKFC – Alternate Diploma for Students with Significant Cognitive Disabilities

DAF-P – Employee Time and Effort Reporting Procedures

KED – Facilities or Services – Grievance Procedures (Section 504)

Student Handbooks

GRADING DISABLED STUDENTS: GRADES K-12

For students with I.E.P.'s, the Special Education Team will determine how the student is to be graded for each subject.

Students with I.E.P.'s who can master regular education curriculum content will be graded using grade level standards. Students who cannot master curriculum content at the grade level will be graded as indicated in the I.E.P.

1. Grading in the Regular Classroom:

- A. Students who can master grade level curriculum content for any/all subject areas will be graded in those subject areas using grade level standards.
- B. Students who cannot master grade level curriculum content for any/all areas will have modifications and individual goals written in the I.E.P. For those subject areas in which classroom goals, objectives/benchmarks, and grading standards are inappropriate, the I.E.P. will indicate the system of grading.

2. Grading in Content Areas Provided by Special Education Teachers:

- A. Grading will be based on the goals and objectives/benchmarks in the I.E.P.

3. Grading for Learning Lab Support Services and Related Services:

- A. Grading will be on the basis of goals and objectives/benchmarks of the I.E.P. When grading is appropriate, the letter grade will reflect student progress on the I.E.P.

Adopted: 5/17/99

Policy Committee question: What about 504 students?

NHSBA sample policy. This policy is recommended to adopt the provisions of the federal Every Student Succeeds Act ("ESSA") which allow the awarding of a "state-defined" Alternate Diploma to certain students with the most significant cognitive disabilities.

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IKFC - ALTERNATE DIPLOMA FOR STUDENTS WITH SIGNIFICANT COGNITIVE DISABILITIES

(Download policy)

Category: Recommended

Related Policies: IHBA, IHBI, IKF

A. PURPOSE. The purpose of this policy is to meet the requirements of the federal Every Student Succeeds Act ("ESSA") to establish and allow the awarding of a District Alternate Diploma to certain students with the most significant cognitive disabilities.

B. INTRODUCTION. Under ESSA, states may adopt alternate content standards and alternate assessments for students with the most significant cognitive disabilities. In states that have adopted such alternative content standards, ESSA allows local school boards to adopt policies allowing certain students with significant cognitive disabilities the ability to earn an Alternate Diploma based on the alternative content standards.

An Alternate Diploma provides students who may have ordinarily earned certificates of attendance, or completion under New Hampshire Administrative Rule Ed. 306.27(q), with the option to earn a diploma.

New Hampshire has adopted Dynamic Learning Maps (DLM) as an alternate assessment tool. The DLM assessment measures yearly student progress, and provides independent standards which align with the NH Statewide Assessment.

Accordingly, this policy authorizes the District to award an Alternate Diploma in accordance with the below requirements and conditions.

C. ELIGIBILITY.

Consistent with ESSA, the Alternate Diploma may be awarded to students who:

1. Have significant cognitive disabilities;
2. Have a current Individualized Education Program ("IEP"); and
3. **Have the option to participate in the state authorized alternate assessment based on recommendations of the IEP team.** (currently DLM).

The Alternate Diploma is NOT available to students without IEP's, including students with Section 504 plans.

D. DETERMINATION OF AWARD.

The determination to award and the Alternate Diploma is the responsibility of the student's IEP team, including the student's parent(s)/guardian(s). The IEP team's consideration of the

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appropriateness of an Alternate Diploma should be included in transition planning beginning at age sixteen (16). Details of this decision shall be included in the student's IEP transition plan in accordance with Ed. 1109.03.

E. TIME OF AWARD.

The student may choose (~~individually~~ or through the IEP team **process**) to receive the Alternate Diploma at one (1) of three (3) times: ***Policy Committee question: Legally, does a student have the right to do this on their own?***

1. At graduation with common age peers;
2. At the conclusion of the student's IEP; or
3. Upon reaching age twenty-one (21).

If the student participates in the traditional graduation ceremony, the student will be included in the graduation program with no difference in listing from his/her peers awarded a regular diploma.

F. EFFECT OF AWARD AND CONTINUED ELIGIBILITY.

1. Under 34 CFR 300.102 (a)(3), the awarding of any document other than regular high school diploma shall not terminate a child's eligibility for a free and appropriate public education ("FAPE"). Accordingly, earning an Alternate Diploma does not end a student's eligibility for special education services. Rather, students who have earned the Alternate Diploma, and are otherwise eligible for special education services, may continue to receive such services and may continue working towards meeting the requirements for the regular high school diploma.
2. Alternate Diplomas awarded under this policy are counted in the state graduation rate, while certificates of attendance or equivalency are not.

G. IMPLEMENTATION.

The Superintendent, with the assistance of the [Director of Special Education/Student Services Director] is directed to establish, and make available procedures and administrative rules to implement this policy.

Legal References:

20 U.S.C. §7801 (23) - Every Student Succeeds Act (§ 8101(a)(23))

34 CFR 300.102 (a)(3); 300.43; and 300.320(b)

RSA 193-E - Adequate Public Education

Ed 306.27(q)(4)- Minimum Standards/High School Requirements/Equivalency Diplomas

Ed 1109.03- When and IEP is in Effect...Transition Services

EMPLOYEE TIME AND EFFORT REPORTING PROCEDURES

This procedure applies to all employees of the Gilford School District for tracking time and effort funded in whole or in part by federal grants.

1. Purpose

The purpose of this procedure is to ensure the Gilford School District is in compliance with 2 CFR 200.430 related to federally funded employees. Compliance with 2 CFR 200.430 can be assured by following the procedures described herein.

2. Statutory Requirement

2 CFR 200.431 reads as follows;

“Any employee funded by federal grants must maintain documentation showing that their time is allocable to a federal program.” The difference between single and multiple cost objectives is determined by how an employee’s time is spent working, not how the employee is funded.

A. Single Cost Objective Employees

1. Employees whose salaries are funded under a single federal grant cost objective are required to report their time and effort through periodic (semiannual January 1-June 30 and July 1 –December 31) certifications.

- a) Semiannual certifications are due 30 days from the end of the period.
 - i. January 1-June 30 semiannual certifications are due no later than July 30.
 - ii. July 1-December 31 semiannual certifications are due no later than January 30.

2. The key to determining whether an employee is working on a single cost objective is whether the employee’s salary and wages can be supported in full from the federal grant alone, or if the employee’s salary is also paid with non-federal funds. If the employee’s duties could be paid in full from the federal source, then the employee has a single cost objective.

3. The reporting requirements for the semiannual certification are as follows:

- The employer’s name
- The employee’s name and position

- The name of the federal program and cost objective under which the employee was 100% funded
- The reporting period (semiannual, at minimum)
- A statement reporting the employee worked solely on that program for the period covered by the certification
- The dated signature of the employee and supervisor with firsthand knowledge of the employee's activities

4. In addition, the certification must meet the following requirements:

- Must be completed once in each six-month period
- Must be prepared after the work is performed
- Must account for total activity performed during the reporting period

B. Multiple Cost Objective Employees

1. Employees who work on multiple activities or cost objectives are required to maintain monthly personnel activity reports (PARs) to support the distribution of their salaries or wages.

2. The key to determining whether an employee is a multiple cost objective employee is whether the employee's salary and wages are paid by more than one federal award program, by more than one set-aside (i.e. administrative and state-level/leadership set-asides) within one federal award program, or by federal award program(s) and non-federal programs.

3. The PAR reporting requirements are as follows:

- The employer's name
- The employee's name and position
- A certification statement certifying the distribution of time and effort is correct
- The dated signature of the employee and supervisor with firsthand knowledge of the employee's activities

4. In addition, the PAR must meet the following requirements:

- Must be prepared after the work is performed
- Must account for total activity for which the employee is compensated

- Must be prepared to coincide with each pay period
- Must agree with supporting documentation

3. Gilford Time and Effort Reporting Requirements

A. Exiting Employees

1. When an employee is preparing to exit their current position at the school, the employee must submit a final signed and dated PAR, in paper or electronically, to their supervisor the day they exit.
2. If an employee exits the school and did not complete a final PAR or semiannual certification, the supervisor with firsthand knowledge of the employees work may sign for that former employee.
3. The supervisor must submit a final summary PAR for the exiting employee to the central office and kept in the grant file for three years. This may be in paper format or electronically. The documents will be located in the human resource office file cabinet (distinctly labeled), or it may be scanned and filed as a pdf under the google drive (distinctly labeled).

B. Semi-Annual Certification

1. Employees that are funded by a single cost objective are required to complete, sign and date the semi-annual certification. This can be done either in paper form or a google certification requiring both the employee and supervisors signature and date. Stipend Time and Effort will be available in electronic or paper format. The electronic document will need to be converted to a PDF.

Human Resource Director will generate the appropriate semi-annual certification based on payroll activity grant vouchers. Certifications will be delivered to grant managers / supervisors and reviewed for accuracy. Once collected and reviewed the supervisor will sign, date and return all completed documents (paper or electronic) to the central office.

2. The semi-annual certification must be completed per #2. A. above. The certification document can be obtained through the central office.

C. Personal Activity Report (PAR)

1. The Superintendent's office will provide a PAR google spreadsheet to each school department that has employees whom work on multiple cost objectives and paid by multiple sources.
2. Time off, such as annual, sick or holiday, is no longer to be allocated based on the employees allocations. The employee will take their lump sum of time off.
3. These spreadsheets are to be completed "after the fact" (after the work has been completed). Once an employee has entered in the required information for the pay period, the employee will sign and date the document and give it to their supervisor to sign and date. A supervisor's signature indicates agreement that the time documented by the employee is accurate to the best of their knowledge.
4. Once the PAR is fully executed, with signatures (Due to COVID 19, signatures can be electronic, typed or physical signature) they are to be either delivered interoffice mail to the Central Office and stored in the appropriate grant time and effort folder, or scanned / saved in the appropriate google document folder.
5. The Business Administrator will review payroll vs. time and effort and make adjustments accordingly.

4. Record Retention

2 CFR 200.333 States that "financial records, supporting documents, statistical records, and all other non-Federal entity records pertinent to a Federal award must be retained for a period of three years from the date of submission of the final expenditure report or for Federal awards that are renewed quarterly or annually, from the date of the submission of the quarterly or annual financial report, respectively, as reported to the Federal awarding agency or pass-through entity in the case of a subrecipient."

5. Internal Control

- A. The Human Resource Director will be responsible to verify all necessary certifications are turned in and report any outstanding to the Superintendent. The completed time and effort certifications will be stored in the clearly marked grant file cabinet located in the Human Resource Office or electronically as long as it is clearly marked.

6. References

2 CFR 200.430

2 CFR 200.333

7. **Definitions**

Matching/Cost Sharing- means a portion of the project or program costs not borne by the federal government, and therefore covered by some other source. Although the two terms are often used interchangeably, the term *matching* is actually a specific type of cost sharing, typically used when a sponsor requires the grantee to "match" the sponsor funding according to a specified ratio.

Cost Objective- A program, function, activity, award, organizational subdivision, contract, or work unit for which cost data is desired and for which provision is made to accumulate and measure the cost of processes, products, jobs, capital projects, etc. A cost objective may be a major function of the non-Federal entity, a particular service or project, a Federal award, or an indirect (Facilities & Administrative (F&A) cost activity, as described in 2 CFR 200, Subpart E- Cost Principles.

FACILITIES OR SERVICES – GRIEVANCE PROCEDURE (SECTION 504)

The Gilford School District provides the following Notice of Procedural Safeguards to parents/guardians, and ~~handicapped~~ **disabled** persons, as required by 34 C.F.R. Sections 104.7, 104.8, 104.22 (4) (f), and 104.36 of the Regulations implementing Section 504 of the Rehabilitation Act of 1973.

The District does not discriminate on the basis of ~~handicap~~ **disability** in admission or access to, or treatment or employment in, its programs and activities.

The District provides a grievance procedure with appropriate due process rights. ~~Esther Kennedy is the designated employee,~~ **The District 504 Coordinator** is charged with coordinating efforts to comply with Section 504. The parent/guardian of ~~handicapped~~ **disabled** students or any ~~handicapped~~ **disabled** person may use the grievance procedure established by the Gilford School Board.

Grievance Procedure: As the parent/guardian of a ~~handicapped~~ **disabled** student or as a ~~handicapped~~ **disabled** person, you have the right to notify the above designated employee with your complaint.

Any qualified disabled person who has a grievance shall discuss it first with the appropriate building level 504 coordinator in an attempt to resolve the matter informally at that level.

The designated employee will make an initial response to the complainant within ten (10) days of receipt of complaint. The parties will attempt to work out their differences promptly and equitably informally. A written record of the resolution of the complaint should be made within ten (10) working days of completion.

If that effort fails, you may (a) request a meeting with the superintendent and, if that does not resolve the matter, you may (b) request the school board places the matter on it's agenda. You may be represented by anyone of your choosing, may present information through documents and other evidence and witnesses, and may examine witnesses presented by the school district.

Within ten (10) working days of either of the above options, a written record should be made of the decision.

If the grievance is not resolved to the aggrieved party's satisfaction, the aggrieved party, no later than five (5) school days after receipt of the Coordinator's decision,

Current GSD Policy for review and reaffirm. This policy is required by law.

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may submit a written request for a hearing with the local School Board regarding the alleged discrimination through the Superintendent of Schools. The hearing will be held within thirty (30) calendar days of the written request. The School Board must provide the aggrieved party with a written decision on the appeal within ten (10) calendar days after the hearing.

The decision of the School Board is final pending any further legal recourse as may be described in current local district, state or federal statutes pertaining to Section 504 of the Rehabilitation Act of 1973.

~~Section D Procedural Safeguards: As required by Section 104.36, as the parent/guardian of a student, who because of handicap needs or is believed to need special instruction and related services, you have the right, with respect to any action regarding identification, evaluation, and placement to:~~

- ~~1. Notice of referral/identification, evaluation, and placement process, with appropriate consent form.~~
- ~~2. Examine all relevant records~~
- ~~3. At an impartial hearing, at any time, with respect to any actions regarding identification, evaluation, or placement of persons who need or are believed to need special education and related services, an opportunity for participation by you and representation of counsel as provided under the Individuals with Disabilities Act.~~
- ~~4. A review process.~~

Legal References:

Section 504 of the Rehabilitation Act of 1973

34 C.F.R. § 104.7(b), Adoption of Grievance Procedures

(Adopted: 4/20/09)