



Washtenaw Intermediate School District

August 12, 2025 Board of Education Meeting

Regular Meeting

Date and Time

Tuesday August 12, 2025 at 5:00 PM EDT

Location

1819 S. Wagner Rd, Ann Arbor, MI 48106

Agenda

Presenter

I. Opening Items

A. Call the Meeting to Order

President Mary
Jane Tramontin

B. Roll Call

TJ Greggs

II. Approval of the Agenda

A. July 30, 2025 Board Retreat Agenda Memo **Pg 5**

III. Communications

Presenter

IV. Public Participation

V. Consent Agenda

- A.** Approval: Minutes **Pg 10**
- B.** Superintendent's Recommendations
12-25-26 Reclassification Requests **Pg 17**
- C.** Superintendent's Recommendations
13-25-26 Staff Resignations **Pg 24**
- D.** Superintendent's Recommendations
14-25-26 Rescinded Staff Resignations **Pg 33**
- E.** Superintendent's Recommendations
15-25-26 Supplemental Services Pilot Plan for Whitmore Lake Public Schools **Pg 38**
- F.** Superintendent's Recommendations
16-25-26 Afghan Refugee School Impact (ARSI) Grant Amendment 2 **Pg 41**

VI. New Business

- A.** Updated WISD Policy – Second Read **Pg 47**
- B.** Update Head Start/GRSP Policies – Second Read **Pg 56**
- C.** Updated WISD Policy – First Read **Pg 84**
- D.** Authorization of Closed Session

VII. Other Items of Business

- A.** Board of Education Conferences **Pg 126**

VIII. Board of Education Reports

IX. Administrative Reports

- A.** Superintendent's Report

Presenter

X. Recess to Closed Session

XI. Reconvene to Open Session

XII. Closing Items

A. Adjourn Meeting

Coversheet

July 30, 2025 Board Retreat Agenda Memo

Section: II. Approval of the Agenda
Item: A. July 30, 2025 Board Retreat Agenda Memo
Purpose:
Submitted by:
Related Material: August 12, 2025 Board Memo.pdf



MEMORANDUM

TO: Board of Education

FROM: Naomi Norman, Superintendent

DATE: August 7, 2025

RE: Regular Board Meeting August 12, 2025

Agenda Item 2: Approval of the Agenda: President Tramontin will ask for approval of the agenda.

Agenda Item 3: Communications: There are no communications at this time.

Agenda Item 4: Public Participation: Members of the public who wish to address the Board may do so at this time.

Agenda Item 5 : Consent Agenda

A. Approval: Minutes: Approval of the minutes of the July 30, 2025, regular meeting.

B. Approval: Superintendent's Recommendations:

The Superintendent recommends the Board accept the following reclassification Requests:

012-25-26 Reclassification Request: Please see the staff reclassification requests for:
Kanika Spears, current position: General Ed Social Worker, 1.0 FTE, 205 workdays, Salary: per contract, no change, Unit II. Recommended position: WISD staff Social Worker, 1.0 FTE, 185 workdays, Salary: \$100,393, Unit II.

The Superintendent recommends the Board accept the following staff resignations:

013-25-26 Staff Resignations: Please see the staff resignations for:
Erica Rogers, effective August 4, 2025. Erica has been employed with the WISD since May 5, 2025, as a Teacher Assistant in our ASD Program.

L. Sofia Badillo, effective August 18, 2025. L. Sofia has been employed with the WISD since December 16, 2021, as a Teacher Assistant first at our LB Dexter Life-Skills program and recently at High Point.

Michele Danilowicz, effective August 1, 2025. Michele has been employed with the WISD since September 1, 2010, as a Teacher Consultant for the Visually Impaired.

Niema Lewis effective August 18, 2025. Niema has been employed with the WISD since March 9, 2020, as a Family and Community Partnership Specialist in our Early Childhood Department.

The Superintendent recommends the Board accept the following rescinded staff retirements:

014-25-26 Rescinded Staff Resignations: Please see the rescinded staff retirements for: Simonne Mildenstein was to be effective October 31, 2025. Simonne will continue her employment with the WISD as a Flex Teacher.

015-25-26 Supplemental Services Pilot Plan for Whitmore Lake Public Schools: Please see the board memo from Deputy Superintendent Cherie Vannatter. In order to provide appropriate special education support to students, WLPS is requesting a change from the current plan by switching a one (1) full-time teacher consultant for one (1) full-time teaching assistant. The total WISD support to the WLPS Supplemental Services Pilot Plan for 2025/2026 school year would be one (1) full-time speech and language pathologist, one (1) full-time teaching assistant, .8 ITE school psychologist, and one (1) registered behavior technician.

The Superintendent recommends that the Board of Education authorize the administration to continue to provide a Supplemental Services Pilot Plan to Whitmore Lake Public Schools by switching a one (1) full-time teacher consultant for one (1) full-time teaching assistant, as presented.

016-25-26 Afghan Refugee School Impact (ARSI) Grant Amendment 2: Please see the board memo from Director of Instruction Dr. Jennifer Banks. The ARSI initiative is designed to strengthen local education agencies' ability to promote academic achievement and successful integration of eligible Afghan refugee students into their school communities. Amendment 2 adds \$125,000.00 to the grant and revises the budget to support continuation of the Coordinator of Newcomer Supports position, for the total amount of \$712,718.00.

The Superintendent recommends that the Board of Education authorize the administration to accept the Afghan Refugee School Impact (ARSI) Grant Amendment 2 from the Michigan Department of Labor and Economic Opportunity in the amount of \$712,718.00, as presented.

Recommendation: The Superintendent recommends that the Board of Education approve the minutes and Superintendent's recommendations in the Consent Agenda, as presented. (Roll Call Vote)

Agenda Item 6: New Business:

A. Updated WISD Policy – Second Read: Please see the memo from Supervisor of Human Recourse and Legal Services Becky Mullins. The Policy Committee recommends the adoption of revised policy #3220 – Professional Staff Evaluation. A first read of the policy was done during the Board's retreat on July 30, 2025, which included highlights of the proposed changes.

Recommendation: Motion that the Board of Education approve the updated policy #3220 – Professional Staff Evaluation, as presented. (Roll Call Vote)

B. Update Head Start/GRSP Policies – Second Read: Please see the memo from Supervisor of Human Recourse and Legal Services Becky Mullins. The Washtenaw ISD Head Start and Early Head Start

Policy Council approved 5 policies on Wednesday, July 9th, 2025. All Head Start policies are reviewed annually by the Early Childhood Department. New policies and recommended changes are reviewed by the WISD Policy Committee, reviewed, and approved by the Head Start and Early Head Start Policy Council, and finally reviewed and approved by the Washtenaw ISD Board of Education.

Recommendation: Motion that the Board of Education approve the updated Head Start and Early Head Start Policies:

- 1) **Active Supervision**
- 2) **Attendance – Home Based**
- 3) **Disability Referral Process**
- 4) **Transportation**
- 5) **Van Usage**

(Roll Call Vote)

C. Updated WISD Policy – First Read: Please see the memo from Supervisor of Human Recourse and Legal Services Becky Mullins. The Policy Committee recommends the adoption of revised policies listed below. No action from the Board of Education is needed at this time.

- 1) PO 1130 – Conflict of Interest
- 2) PO 3110 – Conflict of Interest
- 3) PO 4110 – Conflict of Interest
- 4) PO 6110 – Grant Funds
- 5) PO 6111 – Internal Controls
- 6) PO 6112 – Cash Management of Grants
- 7) PO 6114 – Cost Principles-Spending Federal Dollars
- 8) PO 6325 – Procurement-Federal Grant Dollars
- 9) PO 6550 – Travel Payment and Reimbursement
- 10) PO 7310 – Disposition of Surplus Property
- 11) PO 7450 – Property Inventory

D. Authorization of Closed Session: The Board of Education has requested a closed session under Section 8(a) for the purpose of conducting the Superintendent's evaluation.

Recommendation: Motion that the Board of Education authorizes a closed session under Section 8(a) for the purpose of conducting the Superintendent's evaluation, as presented. (Roll Call Vote).

Agenda Item 7: Other Items of Business:

A. Board of Education Conference Date Finalization: Please see the memo from Superintendent Naomi Norman for the breakdown of the additional conferences.

Recommendation: Motion that the Board of Education to authorize the reimbursement of Board Members incurring expenses while on official duty for business of the Board of Education for the following 2025-26 Conferences:

National School Board Association (NSBA) – Advocacy & Equity Institute, with an estimated total expenditure of \$3,296.53.

**Michigan Head Start Association – 2025 Fall Assembly, with an estimated total expenditure of \$1,530.08.
(Roll Call Vote).**

Agenda Item 8: Board of Education Reports:

Agenda Item 9: Administrative Reports:

A. Superintendent’s Report: Superintendent Norman will address the board.

Agenda Item 10: Recess to Closed Session

Agenda Item 11: Reconvene to Open Session

Agenda Item 12: Adjournment

Coversheet

Approval: Minutes

Section:	V. Consent Agenda
Item:	A. Approval: Minutes
Purpose:	
Submitted by:	
Related Material:	7-30-25 Minutes.pdf



**WASHTENAW INTERMEDIATE SCHOOL DISTRICT
BOARD OF EDUCATION MEETING MINUTES**

Wednesday, July 30, 2025

The Washtenaw Intermediate School District Board of Education held the Board Retreat meeting on Wednesday, July 30, 2025, at the Peace Hub Community Center, 1515 S. Harris, Ypsilanti, MI 48198.

CALL TO ORDER

The meeting was called to order at 12:32 PM by President Mary Jane Tramontin

ATTENDANCE

The following members were present:

Mary Jane Tramontin, President
Steve Olsen, Vice President
Dorcas Musili, Secretary
Diane Hockett, Trustee
Sarena Shivers, Treasurer (Virtual)

The following member was absent:

Quorum was met.

Also present:

Naomi Norman, Superintendent
Cherie Vannatter, Deputy Superintendent
Brian Marcel, Associate Superintendent
Cassandra Harmon-Higgins, Executive Director, Human Resources and Legal Services
Matthew Cook, Chief Information Officer
Holly Heaviland, Executive Director, School and Community Partnerships
Deborah Hester-Washington, Executive Director, Special Education
Edward Manuszak, Executive Director, Early Childhood Programs
Ashley Kryscynski, Director of Communications and Public Relations
Tanner Rowe, Operations Director
Amy Olmstead-Brayton, Supervisor of Instruction
Dawn Stewart, Supervisor of Instructional Supports & Student Programs
Katherine Griswold, Member of the Public

APPROVAL OF THE AGENDA

Steve Olsen moved, Diane Hockett seconded, to move Item 8 of the agenda before Item 7, as presented.

Ayes: Mary Jane Tramontin, Steve Olsen, Dorcas Musili, Diane Hockett

Nays: None.

Motion carried.

COMMUNICATIONS: Executive Director of Early Childhood Dr. Edward Manuszak shared about the upcoming Early Childhood Conference and the donations received.

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FINANCIAL REPORTS – Associate Superintendent Brian Marcel reviewed the financial reports for June 2025.

CONSENT AGENDA

Diane Hockett motioned, Steve Olsen seconded, that the Board of Education approve the minutes and Superintendent's recommendations in the Consent Agenda, as presented.

Voting yes: Mary Jane Tramontin, Steve Olsen, Dorcas Musili, Diane Hockett

Voting no: None.

Motion carried.

Approval of Minutes

The Board approved the minutes of the June 24, 2025, regular meeting.

001-25-26

The Board approved the following employment recommendations:

- Aaron Walker as an Assistant Drone Aviation Instructor
- Danielle West as a MiSTEM Program Manager
- Nathalie Ruella as an Emotional Impairment Special Education Teacher at Progress Park
- Tim Genyk as a Teaching Assistant
- Tracy Welch-Konett as a Social Worker

002-25-26

The Board approved the following reclassification requests:

- Charlie Jones, Career Technical Education Data Entry & Reporting Specialist, 1.0 FTE, 210 Workdays, Non-Affiliate, to Career Technical Education Data Entry & Reporting Specialist II, 1.0 FTE, 210 Workdays, Non-Affiliate.
- Jackson Greenstone, Coordinator of CTE Special Populations, 1.0 FTE, 210 Workdays, Non-Affiliate, to Supervisor of CTE Special Populations, 1.0 FTE, 210 Workdays, Non-Affiliate.
- Marshaun Brooks, Coordinator of Career Technical Education (CTE), 1.0 FTE, 230 Workdays, Non-Affiliate, to Coordinator of Career Technical Education (CTE), 1.0 FTE, 230 Workdays, Non-Affiliate.
- VACANT, Flex Teacher LBP, 0.8 FTE, 185 Workdays, Unit II, to Flex Teacher LBP, 1.0 FTE, 185 Workdays, Unit II.

003-25-26

The Board authorized the administration to submit a proposal for the Ethel and James Flinn Foundation 2025 grant, as presented.

004-25-26

The Board authorized the administration to submit a proposal for the Reading Excellence and Advancing District Innovation Grant for the amount of \$187,500.00, as presented.

005-25-26

The Board authorized the administration to accept FY 2026 SNAP-Ed grant in the amount of \$360,746.00, as presented.

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006-25-26

The Board authorized the administration to approve the Contract Amendment with Boston University for the Next Generation Science Exemplar (NGSx) Program for a cost not to exceed \$54,625.00, as presented.

007-25-26

The Board authorized the administration to approve CGC Water Treatment & Plumbing as a pre-qualified contractor for EGLE Filter First services and products for potentially a five-year period (one year, with 4 one-year renewal options) and to utilize this contract to purchase materials and services for a cost not to exceed \$75,543.00, as presented.

008-25-26

The Board approved the contract with Sunbelt Staffing in an amount not to exceed \$315,000.00, as presented.

009-25-26

The Board authorize the administration to approve the contract with University of Michigan for audiology services in the amount of \$152,000.00, as presented.

010-25-26

The Board authorized the administration to continue to provide a Supplemental Services Pilot Plan to Ypsilanti Community Schools and increase our support to include an additional speech and language therapist and two additional school social workers, as presented.

011-25-26

The Board authorized the administration to accept the two new grants from AAACF, EmpowerMENT fund (\$15,000) and Arts and Culture (\$13,000) for a total amount of \$28,000, as presented.

OTHER ITEMS OF BUSINESS – Career and Technical Education Millage Cost Discussion: Superintendent Naomi Norman and the Board discussed options for the upcoming CTE Millage ballot, and the costs associated with them.

NEW BUSINESS – PreK-12 Strategic Investments in STEM Career Expose: Superintendent Naomi Norman shared the details of the MiSTEM and Michigan Department of Labor and Economic Opportunity grant with the Board.

Diane Hockett motioned, Dorcas Musili seconded, that the Board of Education authorize the administration to accept the Michigan Department of Labor and Economic Opportunity and MiSTEM grant in the amount of \$500,000.00, as presented.

Voting yes: Mary Jane Tramontin, Steve Olsen, Dorcas Musili, Diane Hockett

Voting no: None.

Motion carried.

NEW BUSINESS – 2025 TLC HVAC Replacement: Director of Operations Tanner Rowe discussed the choice for the HVAC system replacement at the TLC building with the Board.

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Steve Olsen motioned, Dorcas Musili seconded, that the Board of Education authorize the administration to utilize capital project funds to perform HVAC equipment replacement at the Teaching and Learning Center building in the amount not to exceed \$2,710,881.00, as presented.

Voting yes: Mary Jane Tramontin, Steve Olsen, Dorcas Musili, Diane Hockett

Voting no: None.

Motion carried.

NEW BUSINESS – Lincoln Consolidated Schools Technology Shared Services: Chief Information Office Matthew Cook shared details of the Lincoln Consolidated Schools contract to continue shared technology services with the Board.

Diane Hockett motioned, Dorcas Musili seconded, that the Board of Education approve the contract with Lincoln Consolidated Schools for the same purpose in the amount of \$2,513,812.88, as presented.

Voting yes: Mary Jane Tramontin, Steve Olsen, Dorcas Musili, Diane Hockett

Voting no: None.

Motion carried.

NEW BUSINESS – Gifted Healthcare Staffing Contract: Executive Director of Special Education Deborah Hester-Washington discussed the purpose of continuing to contract with Gifted Healthcare Staffing with the Board.

Steve Olsen motioned, Dorcas Musili seconded, that the Board of Education authorize the administration to approve the contract with Gifted Healthcare in the amount of \$925,000.00, as presented

Voting yes: Mary Jane Tramontin, Steve Olsen, Dorcas Musili, Diane Hockett

Voting no: None.

Motion carried.

NEW BUSINESS – Updated WISD Policy – First Read: Associate Superintendent Brian Marcel went over the changes made to Policy #3220 – Professional Staff Evaluations. Since this was a first read, no action from the Board was taken.

NEW BUSINESS – Update Head Start/GRSP Policies – First Read: Superintendent Naomi Norman shared the changes made to the following Head Start policies: *Active Supervision, Attendance – Home Based, Disability Referral Process, Transportation, and Van Usage*. Since this was a first read, no action from the Board was taken.

NEW BUSINESS – Local 3760 AFT Michigan, Unit I Tentative Agreement (2024-2027 Contract): Associate Superintendent Brian Marcel shared the final changes for the 2024-2027 CBA agreement with Unit I with the Board.

Dorcas Musili motioned, Steve Olsen seconded, that the Board of Education approve the Tentative Agreement of the three-year (July 1, 2024 – June 30, 2027) collective bargaining agreement reached with Unit I, as presented.

Voting yes: Mary Jane Tramontin, Steve Olsen, Dorcas Musili, Diane Hockett

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Voting no: None.

Motion carried.

NEW BUSINESS – Strategic Plan: Superintendent Naomi Norman shared the 2030 Strategic Plan. The Board reviewed the plan and made changes to the drafted vision statement and separated the Board Goals from the Strategic Plan for adoption purposes. "Washtenaw ISD is a community where people truly matter, all voices are heard, we show up for each other, learn together, and where we all thrive."

Diane Hockett motioned, Dorcas Musili seconded, that the Board of Education approve the 2030 Strategic Plan, as presented.

Voting yes: Mary Jane Tramontin, Steve Olsen, Dorcas Musili, Diane Hockett

Voting no: None.

Motion carried.

NEW BUSINESS – Board Goals 2025-2026: Superintendent Naomi Norman discussed the 2025-2026 Board Goals and made any changes with the Board.

Dorcas Musili motioned, Diane Hockett seconded, that the Board of Education approve the Board Goals for the 2025-2026 year, as presented.

Steve Olsen motioned, Dorcas Musili seconded, that the motion on the table be amended to reflect a change in Goal 1 to read, "Educate in a manner that meets the needs of each and every student inclusive of social identities, while building an organizational culture reflecting our shared values."

Voting yes: Mary Jane Tramontin, Steve Olsen, Dorcas Musili, Diane Hockett

Voting no: None.

Motion carried.

The original motion was changed to: The Board of Education approves the Board Goals for the 2025-2026 year, as amended.

Voting yes: Mary Jane Tramontin, Steve Olsen, Dorcas Musili, Diane Hockett

Voting no: None.

Motion carried.

BOARD OF EDUCATION REPORTS:

- Trustee Tramontin reminded the board about finalizing any other conferences they would like to attend during the 2025-26 year.

ADMINISTRATIVE REPORTS – Superintendent's Report:

Superintendent Naomi Norman spoke about the following:

- Superintendent Norman shared details about her discussion about special elections with the Washtenaw County Clerk Lawrence Kestenbaum.

RECESS TO CLOSED SESSION

The Board went into recess for break at 2:35 p.m.

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RECONVENE TO OPEN SESSION

The Board reconvened at 2:46 p.m. to continue the retreat.

ADJOURNMENT

The meeting was adjourned at 4:55 p.m.

Respectfully submitted,

Dorcas Musili, Secretary
Washtenaw ISD Board of Education

Coversheet

Superintendent's Recommendations

Section:	V. Consent Agenda
Item:	B. Superintendent's Recommendations
Purpose:	
Submitted by:	
Related Material:	Position Change_K. Spears.pdf

Washtenaw ISD Position Change / Upgrade Form

The supervisor of the position should complete and sign this form if you are anticipating an upgrade /reclassification, title/duties change and/or a salary/market increase for the position. Please note that the final decision on classification of the subject position will be made by the Executive Cabinet and the Superintendent.

Change Recommended

Please select all that apply

- ☒ Position change
- ☐ Salary Level /Wage
- ☐ Location
- ☐ FTE
- ☐ Bargaining Unit
- ☐ Work days
- ☐ Account Split
- ☐ Other

Employee Name:

Please enter the employee name, incumbent name, or "Vacant"

Kanika Spears

Department

Special Education

Lyn Arons

Current Position Title

General Ed Social Worker

Recommended Position Title

WISD staff Social Worker

Current Position Number

22.00.216.06

Recommended Position Number

26.71.216.03

Current Bargaining Unit

Unit II

Recommended Bargaining Unit

Unit II

per contract, no change

Recommended Pay Rate/ Salary Level

\$100,393

Current FTE

1.0

Recommended FTE

1

Current Number of Work Days

205

Recommended Number of Work Days

185

Should the Current Position Remain?

- ☒ Remain
- ☐ Delete

Current Account 1

11.1216.1440.000.2253.00000.0000

Current Account 4 Split**Recommended Account 1**

22.1216.1440.041.0000.00000.3800

Recommended Account 1 Split

100

Recommended Account 2**Recommended Account 2 Split****Recommended Account 3****Recommended Account Split 3****Recommended Account 4****Recommended Account 4 Split****Current Location**

Worksite/Desk Location

Bridge Team

Recommended Location

Worksite/Desk Location

Red Oak OR HP

Rational for Position Change

Briefly explain how this position has changed, giving concrete examples of the changes

interviewed for special education position and was recommended to move forward with HR process

List Positions/Employees Performing Similar Work

Do you know of/are you aware of any other positions or employees assigned/performing work similar to that of this position in its new description? If so, please list position titles or names of incumbents

replacing retiring SW staff member Mary Beth DiFranco

Department Head Comments

Department Head

Deborah Hester-Washington

06/12/2025

Finance Approval

- ☒ Approve
- ☐ Adjust, See Comments

Finance

SAP

06/18/2025

Human Resources Approval

- ☒ Approve
- ☐ Adjust, See Comments

Human Resources Comments

Human Resources / Executive Admin Review

CD Harmon-Higgins

06/12/2025

Superintendent Comments

WASHTENAW INTERMEDIATE SCHOOL DISTRICT

Position Description

Job Title: School Social Worker
Location: Various Locations
Department: Special Education Services
Reports To: Special Education Principal
Prepared By: Lyn Arons
Special Education Principal
Prepared Date: April 4, 2025
Approved By: Cassandra Harmon-Higgins, Esq.
Executive Director of Human Resources and Legal Services
Approved Date: April 4, 2025

The WISD's Mission is to educate, serve, and advocate with students, families, schools and the community. We disrupt racial inequities, build just educational systems, and expand access for all learners. We value human potential while striving to support current and future generations of Washtenaw County to enrich as many lives as we possibly can.

The WISD's Vision is to be a leader in empowering, facilitating, and delivering high-quality, boundary-spanning, educational system that educates all children through an equitable, inclusive, and holistic approach.

SUMMARY:

The School Social Worker evaluates, plans and implements services for students who attend the WISD special education programs within the education/community setting as well as assist in reading and collecting data which will lead to program development for individual students. This position works with and instructs classroom staff, related services staff, administrators and parents in the implementation of programming.

ESSENTIAL DUTIES AND RESPONSIBILITIES:

- Demonstrates a strong commitment to equity, social justice, and inclusion in all practices and position responsibilities.
- Demonstrates an awareness of and commitment to Trauma-Informed Care practices to support student success and growth within the educational setting.
- Demonstrates the ability to examine how his/her/their position (directly or indirectly) impacts educational inequities in student achievement outcomes.
- Engages in reflection and ongoing learning and development on critical concepts and terms identified in the Washtenaw ISD Educational Equity Policy including concepts such as cultural proficiency, racial equity, and systemic and structural inequities.
- Attends Individualized Education Planning ("IEP") Committee and any other meetings pertinent to the IEP process.
- Participates as an active member of a student support team.
- Provides support to students and their families.
- Consults with staff members and assists in program planning for students.
- Investigates and disseminates information related to student experiences in and out of school and assesses the impact of these experiences on student functioning in the program.
- Serves as liaison between school personnel, family and other agencies.
- Compiles student socio-emotional history and evaluations.
- Consults with case coordinator providing a supportive and interpretive liaison service among parents, school personnel and students.
- Provides materials and consultant services to the parents and educational staff so they may better understand and appreciate the nature and degree of the disability.
- Assists in evaluating supports for students.

- Collaborates with building administration, instructional staff, medical staff and other agencies to integrate students into the community, with emphasis on involving families, facilitating natural supports, and focusing instruction and behavioral strategies on long-term outcomes.
- Participates in special education program activities, staff meetings, student/staff meetings, program meetings, in-service activities and other meetings as determined necessary.
- Participates in district level staff meetings, in-service activities, staff development/special programs, school improvement teams and planning committees as appropriate to the assignment.
- Works cooperatively and communicates with District and constituent district staff, students and parents/guardians.
- Maintains accurate attendance records and appropriate reports.
- Adheres to District health and safety rules, policies and procedures.
- Supports WISD vision and mission to enhance achievement for all students.
- Supports a team-based approach to problem solving.
- Demonstrates operational knowledge of Internet and Web-related technologies.
- Demonstrates skills and comfort using the latest instructional online tools and technology.
- Performs such other tasks as may from time to time be assigned by the supervisor.
- Maintains regular predictable attendance.
- **OTHER RELATED DUTIES AS ASSIGNED.**

SUPERVISORY RESPONSIBILITIES:

- N/A.

QUALIFICATIONS:

To perform this job successfully, an individual must be able to perform each essential duty satisfactorily. Alternative requirements that may be appropriate and acceptable to the Board of Education may be considered. The requirements listed below are representative of the knowledge, skill and/or ability required. Reasonable accommodations may be made to enable individuals with disabilities to perform the essential functions.

EDUCATION and/or EXPERIENCE:

- Master's Degree in social work REQUIRED.
- Minimum of 500 clock hours supervised social work practicum.
- Possesses experience with computer instruction and technology.
- Possesses the skills and desire to work in a collaborative team with others.
- Previous experience and training working with students who have a wide range of cognitive, physical and emotional abilities.
- Demonstrated ability to assist in interventions for students.
- Demonstrated ability to understand and be able to implement behavior intervention strategies.
- Demonstrated knowledge and understanding of the social workers role in a team environment.
- Such alternatives to the above qualifications as the Board may find appropriate and acceptable.
- Experience working with virtual online instructional setting.

CERTIFICATES, LICENSES, REGISTRATIONS:

- Eligible for temporary or full approval as school social worker through the MDE.
- Must hold valid social work license through the Michigan Dept. of Licensing and Regulatory Affairs.

LANGUAGE SKILLS:

- Ability to work with elementary and secondary students.
- Ability to read, analyze and interpret information including periodicals and professional journals.
- Ability to write routine reports and correspondence.
- Ability to effectively present information and respond to questions from groups of educators, parents, students and the general public.

TECHNICAL SKILLS:

- Ability to integrate technology into the everyday work flow is necessary.
- Ability to utilize District technology and work to maintain proficiency, as required skill sets change with technology and/or the needs of the District.
- Ability to use computer technology for research, data management, communications and other instruction.
- Ability to use a personal computer (PC) or MAC in a networked environment to utilize the Internet and other electronic communication mechanisms.
- Knowledge of productivity applications such as Microsoft Office (word processing, spreadsheets, database and presentation software) is required.
- Ability to use computer technology for research, data management, communications and other instruction.
- Ability to select and administer appropriate assessment tools and interpret results of assessment.
- Ability to use online instructional tools and technology.

MATHEMATICAL SKILLS:

- Ability to apply the concepts of basic math, algebra and geometry consistent with the duties of this position.

REASONING ABILITY:

- Highly proficient in subject areas of: reasoning, problem solving, organizational dynamics and emotional intelligence.
- Ability to apply common sense understanding to carry out instructions furnished in written, oral or diagram form.
- Ability to solve practical problems and deal with a variety of concrete variables in situations where only limited standardization exists
- Ability to interpret a variety of instructions furnished in written, oral, diagram or schedule form.

INTERPERSONAL SKILLS:

- Ability to build rapport with others and to serve diverse publics.
- Ability to take initiative, work well with others as a collaborative team member and exhibit good communication skills.
- Ability to work effectively and collaboratively with other departments, agencies and individuals.
- Ability to work creatively and skillfully with students.
- Ability to demonstrate initiative and understanding in working with students, staff and parents/guardians.

PHYSICAL DEMANDS:

The physical demands described here are representative of those that must be met by an employee to successfully perform the essential functions of this job. Reasonable accommodations may be made to enable individuals with disabilities to perform the essential functions.

While performing the duties of this job, the employee is regularly required to stand; walk; use hands to finger, handle or feel objects, tools, or controls; reach with hands and arms; talk or hear; and taste or smell. The employee is occasionally required to sit and stoop, kneel, crouch, or crawl. The employee must occasionally lift and/or move up to 50 pounds such as books and teaching material or when assisting in student interventions. Specific vision abilities required by this job include close vision, distant vision and the ability to adjust focus. The ability to travel to other buildings is required. The position requires the individual to sometimes work irregular or extended work hours and meet multiple demands from several people. The ability to travel to other buildings is required.

ENVIRONMENTAL ADAPTABILITY:

The work environment characteristics described here are representative of those an employee encounters while performing the essential functions of this job. Reasonable accommodations may be made to enable individuals

with disabilities to perform the essential functions.

The noise level in the work environment is quiet to loud depending upon the activity in the particular part of the day. The employee is frequently required to interact with the public and other staff. The employee is directly responsible for the safety and well-being of students. The employee is exposed to infections at a greater risk than the average person. Occasionally the employee may be required to be outdoors for a short period of time, and therefore subject to varying weather conditions, for purposes of accomplishing the essential functions of this job.

FUNCTIONS OF POSITION DESCRIPTION:

This position description has been prepared to define the general duties of the position, provide examples of work and to detail the required knowledge, skills and ability as well as the acceptable experience and training for the position. The description is not intended to limit or modify the right of any supervisor to assign, direct and control the duties of employees under supervision. The WISD retains and reserves any and all rights to change, modify, amend, add to or delete from any portion of this description in its sole judgment.

This position description is not a contract for employment.

The WISD is an equal opportunity employer, in compliance with the Americans with Disabilities Act. The District will provide reasonable accommodations to qualified individuals with disabilities and encourages both prospective and current employees to discuss potential accommodations with the employer.

TERMS:

This position is subject to terms, conditions, and calendar of the Master Agreement between the District and Unit II AFT Local 3760. Starting salary ranging (dependent upon experience) from \$47,180 - \$101,817.

Washtenaw Intermediate School District is a drug-free workplace.

It is the policy and commitment of the Washtenaw Intermediate School District not to discriminate on the basis of race, color, religion, national origin, sex, disability, age, height, weight, familial status, marital status, genetic information, sexual orientation or any legally protected characteristic, in its educational programs, activities, admissions, or employment policies in accordance with Title IX of the 1972 Educational Amendments, executive order 11246 as amended, Section 504 of the Rehabilitation Act of 1973 and all other pertinent state and Federal regulations.

Coversheet

Superintendent's Recommendations

Section:	V. Consent Agenda
Item:	C. Superintendent's Recommendations
Purpose:	
Submitted by:	
Related Material:	Resignation_L. Sofia Badillo.pdf Resignation_M. Danilowicz.pdf Resignation_N. Lewis.pdf Resignation_E. Rogers.pdf



TO: Naomi Norman, Superintendent; WISD Board of Education

FROM: Cassandra Harmon-Higgins, Esq. Executive Director of Human Resources

DATE: August 12, 2025

RE: Resignation Notification

Attached please find L. Sofia Badillo's letter of resignation, effective August 1, 2025. L. Sofia has been employed with the WISD since December 16, 2021, as a Teacher Assistant first at our LB Dexter Life-Skills program and recently at High Point.

The Administration recommends that the Board accepts L. Sofia's letter of resignation. We wish her well in her future endeavors.

CC: Cherie Vannatter, Deputy Superintendent
Brian Marcel, Associate Superintendent
File

Nicole Hubler

From: Lilia Badillo-Malek
Sent: Friday, August 1, 2025 1:04 PM
To: Nicole Hubler
Subject: Notification of resigning

Dear Nicole Hubler,

Please accept this email as formal notification that I am resigning from my position as Teacher Assistant with WISD. My last day of employment will be 08/01/2025

Due to unforeseen financial circumstances, I have been forced to move out of the state and can no longer continue my employment.

I want to thank you and WISD for the opportunity to work with such a wonderful team. I wish you and the district all the best.

Sincerely,
Lilia Sofia Badillo-Malek

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TO: Naomi Norman, Superintendent; WISD Board of Education

FROM: Cassandra Harmon-Higgins, Esq. Executive Director of Human Resources

DATE: August 12, 2025

RE: Resignation Notification

Attached please find Michele Danilowicz letter of resignation, effective August 18, 2025. Michele has been employed with the WISD since September 1, 2010, as a Teacher Consultant for the Visually Impaired.

The Administration recommends that the Board accepts Michele's letter of resignation. We wish her well in her future endeavors.

CC: Cherie Vannatter, Deputy Superintendent
Brian Marcel, Associate Superintendent
File

Nicole Hubler

From: Michele Danilowicz
Sent: Thursday, July 24, 2025 11:57 AM
To: Cassandra Harmon-Higgins
Cc: Nicole Hubler; Cherie Vannatter; Deborah Hester-Washington; Lynette Arons
Subject: Resignation

Hello Casandra,

I would like to let you know that I will not be returning to my position as a Teacher Consultant-Visually Impaired on August 18th 2025, as I am relocating to France with my family.

I am currently working summer services and plan to continue to work them until August 15th when I complete my summer students.

Please let me know if you have any questions.

Thank you,

Michele Danilowicz
she/her
Blind and Low Vision, Itinerant Teacher
Certified Orientation and Mobility Specialist

Washtenaw Intermediate School District



TO: Naomi Norman, Superintendent; WISD Board of Education

FROM: Cassandra Harmon-Higgins, Esq. Executive Director of Human Resources

DATE: August 12, 2025

RE: Resignation Notification

Attached please find Niema Lewis' letter of resignation, effective August 18, 2025. Niema has been employed with the WISD since March 9, 2020, as a Family and Community Partnership Specialist in our Early Childhood Department.

The Administration recommends that the Board accepts Niema's letter of resignation. We wish her well in her future endeavors.

CC: Cherie Vannatter, Deputy Superintendent
Brian Marcel, Associate Superintendent
File

August 1, 2025

Cassandra D, Harmon-Higgins, Esq.
Executive Director, Human Resources and Legal Services
Washtenaw ISD

RE: TWO WEEK NOTICE (Resignation)

Ms. Higgins:

This correspondence shall serve as an official two-week notice confirmation that I will no longer be working for the Early Childhood Department under Head Start as a Family & Community Partnership Specialist effective August 15, 2025. I have decided to medically retire after 26 years working in Head Start (HS). I have enjoyed the last five years at the WISD and the administrative team of early childhood. The WISD has accommodated my disability with integrity, respect, and privacy.

I have worked with some of the most intelligent and understanding people. Head Start has been rooted in my heart and will continue to be. I wish the ISD longevity in administering Head Start and the GSRP program. Should the program need anything after my departure. Please feel free to reach out with any questions or request.

Grateful,

Niema M. Lewis

Niema M. Lewis

Cc. Edward J. Manuszak II, PhD, Executive Director of Early Childhood
Cc. Alicia Kruk, Assistant Director, Preschool & Family Services
Cc. Kimberly Whiren, Preschool and Early Education Coordinator



TO: Naomi Norman, Superintendent; WISD Board of Education

FROM: Cassandra Harmon-Higgins, Esq. Executive Director of Human Resources

DATE: August 12, 2025

RE: Resignation Notification

Attached please find Erica Rogers' letter of resignation, effective August 4, 2025. Erica has been employed with the WISD since May 5, 2025, as a Teacher Assistant in our ASD Program.

The Administration recommends that the Board accepts Erica's letter of resignation. We wish her well in her future endeavors.

CC: Cherie Vannatter, Deputy Superintendent
Brian Marcel, Associate Superintendent
File

Nicole Hubler

From: Erica Rogers
Sent: Monday, August 4, 2025 7:22 AM
To: Melissa Paschall; Jennifer Parrelly; Nicole Hubler
Subject: Resignation Notice for Erica Rogers

Hello,

Thank you very much for the wonderful opportunity at High Point community. I will not be able to return as a teaching assistant this upcoming 2025/2026 school year.

Please accept this as my formal resignation. Let me know the best way to return my computer and iPad at your earliest convenience.

Thank you,
Erica Rogers

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Coversheet

Superintendent's Recommendations

Section:	V. Consent Agenda
Item:	D. Superintendent's Recommendations
Purpose:	
Submitted by:	
Related Material:	Rescind Retirement_S. Mildenstein.pdf



TO: Naomi Norman, Superintendent; WISD Board of Education

FROM: Cassandra Harmon-Higgins, Esq. Executive Director of Human Resources

DATE: August 12, 2025

RE: Rescind Retirement Notification

Attached please find Simonne Mildenstein's email rescinding her retirement that was going to be effective October 31, 2025. She will continue her employment with the WISD as a Flex Teacher.

CC: Cherie Vannatter, Deputy Superintendent
Brian Marcel, Associate Superintendent

Nicole Hubler

From: Nicole Hubler
Sent: Wednesday, August 6, 2025 3:14 PM
To: Simonne Mildenstein; Cherie Vannatter; Naomi Norman; Deborah Hester-Washington; Jennifer Parrelly; Melissa Paschall
Cc: Nancy Davis; Naomi Norman
Subject: RE: Retirement Notification

Hi Simonne,

I wanted to let you know that the Superintendents have accepted your rescinded retirement and look forward to you starting in your new Flex Teacher position on the 18th of August.

Thank you.

Nicole Hubler, Human Resources Specialist
Working remotely Tuesdays and Thursdays
Human Resources and Legal Services
Washtenaw Intermediate School District
1819 South Wagner Rd.
PO Box 1406
Ann Arbor, Michigan 48106-1406
Telephone: (734)994-8100 ext.1310
HR Fax: (734)994-1629

Disclaimer: This e-mail is intended solely for the above-mentioned recipient(s) and it may contain confidential or privileged information. If you have received it in error, please notify the sender immediately and delete the e-mail. You must not copy, distribute, disclose, store or take any action in reliance on it. Neither this information block, the typed name of the sender, nor anything else in this message is intended to constitute an electronic signature unless a specific statement to the contrary is included in this message.

From: Simonne Mildenstein <smildenstein@washtenawisd.org>
Sent: Tuesday, July 29, 2025 10:34 AM
To: Cherie Vannatter <cvannatter@washtenawisd.org>; Naomi Norman <nnorman@washtenawisd.org>; Deborah Hester-Washington <washington@washtenawisd.org>; Jennifer Parrelly <jparrelly@washtenawisd.org>; Melissa Paschall <mpaschall@washtenawisd.org>; Nicole Hubler <nhubler@washtenawisd.org>
Cc: Nancy Davis <ndavis@washtenawisd.org>
Subject: RE: Retirement Notification

I am formally rescinding my notice of retirement.

Thank You,
Simonne Mildenstein

From: Cherie Vannatter <cvannatter@washtenawisd.org>
Sent: Friday, June 6, 2025 11:47 AM
To: Simonne Mildenstein <smildenstein@washtenawisd.org>; Naomi Norman <nnorman@washtenawisd.org>; Deborah Hester-Washington <washington@washtenawisd.org>; Jennifer Parrelly <jparrelly@washtenawisd.org>; Melissa Paschall <mpaschall@washtenawisd.org>; Nicole Hubler <nhubler@washtenawisd.org>; Lynette Arons <LArons@washtenawisd.org>

Cc: Nancy Davis <ndavis@washtenawisd.org>

Subject: Re: Retirement Notification

Congratulations, Simonne.

I truly am going to miss having you here at the ISD. You have been an outstanding teacher and so flexible when we have needed to change your assignment. I wish you well in the future.

Cherie

Cherie Vannatter

Deputy Superintendent

Washtenaw Intermediate School District
1819 South Wagner Rd.
PO Box 1406
Ann Arbor, Michigan 48106-1406
Telephone: (734)994-8100 ext.1543
HR Fax: (734)994-1629

From: Simonne Mildenstein <smildenstein@washtenawisd.org>

Sent: Sunday, May 18, 2025 12:35 PM

To: Naomi Norman <nnorman@washtenawisd.org>; Cherie Vannatter <cvannatter@washtenawisd.org>; Deborah Hester-Washington <whashington@washtenawisd.org>; Jennifer Parrelly <jparrelly@washtenawisd.org>; Melissa Paschall <mpaschall@washtenawisd.org>; Nicole Hubler <nhubler@washtenawisd.org>; Lynette Arons <LArons@washtenawisd.org>

Cc: Nancy Davis <ndavis@washtenawisd.org>

Subject: Retirement Notification

May 18, 2025

To Whom It May Concern,

It is with mixed emotions that I share my plans to retire on October 31, 2025. I have loved working as a special education teacher for the past 32 years. I served the last 6 years at the WISD, and I am honored to end my career here.

Should you need any assistance in finding my replacement, I will gladly give my support. Please let me know how I can best help during this process and time of transition.

I want to thank Cheri, Jen, Melissa and Lyn for your support during these past 6 years at the WISD. During my time here I have worked with approximately 30 students and their families, providing not just instruction but also guidance, support and mentorship. I will always think back fondly on my time as a special education teacher.

Please let me know the steps I need to take to formally begin the retirement process. I have spoken with my financial advisor and will be in consult with him to complete this process in August.

Thank You for your tireless support and thoughtful guidance of Washtenaw Intermediate School District.

Sincerely,
Simonne Mildenstein
Special Education Teacher
Washtenaw Intermediate School District
High Point RM 33
SCI/ Young Adult

Coversheet

Superintendent's Recommendations

Section:	V. Consent Agenda
Item:	E. Superintendent's Recommendations
Purpose:	
Submitted by:	
Related Material:	2025-26 WLPS Pilot Program Memo.pdf 2025-26 WLPS Pilot Program.pdf



TO: Naomi Norman, Superintendent; WISD Board of Education

FROM: Cherie Vannatter, Deputy Superintendent 

DATE: August 5, 2025

RE: Supplemental Services Pilot Plan for Whitmore Lake Public Schools

I would like to recommend Washtenaw Intermediate School District (WISD) continue to provide a Supplemental Services Pilot Plan to Whitmore Lake Public Schools (WLPS). In order to provide appropriate special education support to students, WLPS is requesting a change from the current plan by switching a one (1) full-time teacher consultant for one (1) full-time teaching assistant.

The total WISD support to the WLPS Supplemental Services Pilot Plan for 2025/2026 school year would be one (1) full-time speech and language pathologist, one (1) full-time teaching assistant, .8 FTE school psychologist, and one (1) registered behavior technician.

I believe that providing this Supplemental Services Pilot Plan to Whitmore Lake Public Schools is a critical step in ensuring the success of all students.



Whitmore Lake Public Schools

8845 Main Street, Whitmore Lake, MI 48189

Melissa Heuker, Director of Student Services (734) 449-4464 x 5009

Memo of Understanding

Re: Supplemental Services Pilot Program for Whitmore Lake Public Schools

Date: 7/31/25

The purpose of the memo is to modify the agreement between Whitmore Lake Public Schools and Washtenaw Intermediate School District due to the LEA's evolving needs of students and appropriate staffing.

During the 2023-2024 school year, this program provided 1.5 teacher consultants, 1 speech language pathologist, 0.6 FTE school psychologist (3rd party contract), and 1 online learning teaching assistant.

During the 2024-2025 school year, this program provided 1 teacher consultant, 1 speech language pathologist, 0.8 FTE school psychologist (3rd party contracted), and 1 registered behavioral technician.

Whitmore Lake is proposing the following for the 2025-2026 school year: 1 speech language pathologist, 0.8 FTE school psychologist (3rd party contracted), 1 registered behavioral technician, and 1 teaching assistant. Whitmore Lake Public Schools will contract/employ the school psychologist and registered behavioral technician to be reimbursed quarterly by Washtenaw ISD. Washtenaw ISD will employ the speech language pathologist and teaching assistant and assign them to work full time in Whitmore Lake Public Schools.

*Melissa Heuker 7/31/25
Director of Student Services
Whitmore Lake Public Schools*

Coversheet

Superintendent's Recommendations

Section:	V. Consent Agenda
Item:	F. Superintendent's Recommendations
Purpose:	
Submitted by:	
Related Material:	ARSI Grant Amendment 2025 Memo.pdf ARSI22-8101 Amendment 2- Final.pdf



TO: Naomi Norman, Superintendent; WISD Board of Education

FROM: Dr. Jennifer Banks, Director of Instruction

DATE: July 31, 2025

RE: Afghan Refugee School Impact (ARSI) Grant Amendment 2

We recommend that the WISD Board of Education approve acceptance of the Afghan Refugee School Impact (ARSI) Grant Amendment 2 from the Michigan Department of Labor and Economic Opportunity in the amount of \$712,718.00. This represents an increase from the \$587,718.00 awarded in July 2024. The original award, received in July 2022, was \$368,718.00.

Amendment 2 adds \$125,000.00 to the grant and revises the budget to support continuation of the Coordinator of Newcomer Supports position.

The ARSI initiative is designed to strengthen local education agencies' ability to promote academic achievement and successful integration of eligible Afghan refugee students into their school communities.

Contact Dr. Jennifer Banks if you have questions.

CC: Dawn Stewart, Supervisor of Student Supports

Agreement#: ARSI22-8101 Amend 2

Amendment No. 2 to the

Grant Agreement Between

Michigan Department of Labor and Economic Opportunity and

Washtenaw County Intermediate School District

1. Period of Agreement

This agreement shall commence on August 1, 2022, and continue through September 30, 2026. This agreement is in full force and effect for the period specified.

2. Program Budget and Agreement Amount

The total agreement amount is increased from \$587,718.00 to \$712,718.00, and the Department's agreement amount is increased from \$587,718.00 to \$712,718.00.

3. Amendment Purpose

The purpose of the amendment is to add funding to the original agreement for \$125,000.00, and modify the budget as attached.

4. Original Agreement Conditions

It is understood and agreed that all other conditions of the original agreement remain the same.

5. Special Certification

The individual or officer signing this amendment certifies by his or her signature that he or she is authorized to sign this amendment on behalf of the responsible governing board, official or Grantee.

Agreement#: ARSI22-8101 Amend 2

6. Signature Section

For the Michigan Department of Labor and Economic Opportunity

Greg Rivet, Chief Administrative Officer
Executive Office
Department of Labor and Economic Opportunity
State of Michigan

Date

For the GRANTEE:

Authorized Official

Name

Title

Signature

Date

Grantee's Legal Name:

Washtenaw ISD

Mailing Address:

1819 Wagner Road

Ann Arbor, MI 48103

Agreement Number:

Agreement Amount:

Budget Period:

Attachment B.1

ARSI22-8101

\$368,718

10/1/2022 - 9/30/2024

TOTAL PROGRAM BUDGET SUMMARY

LINE ITEM	TOTAL PROGRAM BUDGET	LEO AGREEMENT BUDGET	(A) SERVICE CATEGORY	(B) SERVICE CATEGORY	(C) SERVICE CATEGORY	(D) SERVICE CATEGORY
SALARIES		\$ 218,486.20				
FRINGE BENEFITS		\$ 149,431.80				
OCCUPANCY						
COMMUNICATION	\$ -	\$ -				
SUPPLIES	\$ -	\$ -				
EQUIPMENT	\$ -	\$ 800.00				
TRANSPORTATION	\$ -	\$ -				
CONTRACTED SERVICES	\$ -	\$ -				
SPECIFIC ASSISTANCE TO INDIVIDUALS	\$ -	\$ -				
MISCELLANEOUS	\$ -	\$ -				
TOTALS:	\$ -	\$ 368,718.00	\$ -	\$ -	\$ -	\$ -
NUMBER OF UNITS TO BE PROVIDED:						
RATE PER UNIT OF SERVICE:				#DIV/0!	#DIV/0!	#DIV/0!
Service Category (A):			Service Category (D):			
Service Category (B):						
Service Category (C):						
Authority: P.A. 280 of 1939 Completion: Mandatory Penalty: Agreement Invalid			The Michigan Department of Labor & Economic Opportunity (LEO) does not discriminate against any individual or group because of race, religion, age, national origin, color, height, weight, marital status, genetic information, sex, sexual orientation, gender identity or expression, political beliefs or disability.			

Grantee's Legal Name:

Washtenaw Intermediate School District

Mailing Address:

1819 S. Wagner Rd.

Ann Arbor, MI 48103

Agreement Number:

Attachment B.2

ARSI22-8101

Agreement Amount:

\$344,000

Budget Period:

October 1, 2024 - September 30, 2026

TOTAL PROGRAM BUDGET SUMMARY

LINE ITEM	TOTAL PROGRAM BUDGET	LEO AGREEMENT BUDGET	(A) SERVICE CATEGORY	(B) SERVICE CATEGORY	(C) SERVICE CATEGORY	(D) SERVICE CATEGORY
SALARIES	\$ 202,324.00	\$ 202,324.00	\$ 202,324.00			
FRINGE BENEFITS	\$ 140,688.00	\$ 140,688.00	\$ 140,688.00			
OCCUPANCY	\$ -	\$ -				
COMMUNICATION	\$ -	\$ -				
SUPPLIES	\$ 988.00	\$ 988.00	\$ 988.00			
EQUIPMENT	\$ -	\$ -				
TRANSPORTATION						
CONTRACTED SERVICES	\$ -	\$ -				
SPECIFIC ASSISTANCE TO INDIVIDUALS	\$ -	\$ -				
MISCELLANEOUS	\$ -	\$ -				
TOTALS:	\$ 344,000.00	\$ 344,000.00	\$ 344,000.00	\$ -	\$ -	\$ -
NUMBER OF UNITS TO BE PROVIDED:				1.0		
RATE PER UNIT OF SERVICE:				\$ -	#DIV/0!	#DIV/0!
Service Category (A):	344000	Service Category (D):				
Service Category (B):						
Service Category (C):						

Authority: P.A. 280 of 1939
Completion: Mandatory
Penalty: Agreement Invalid

The Michigan Department of Labor & Economic Opportunity (LEO) does not discriminate against any individual or group because of race, religion, age, national origin, color, height, weight, marital status, genetic information, sex, sexual orientation, gender identity or expression, political beliefs or disability.

Coversheet

Updated WISD Policy – Second Read

Section:	VI. New Business
Item:	A. Updated WISD Policy – Second Read
Purpose:	
Submitted by:	
Related Material:	08.07.25 - Memo to B of Ed - 2nd Read 08.12.25.pdf PO 3220 - Professional Staff Evaluation.pdf



Washtenaw I S D

A REGIONAL EDUCATIONAL SERVICE AGENCY

DATE: August 7, 2025

TO: Naomi Norman, Superintendent and
Members of the WISD Board of Education

FROM: Becky L. Mullins
Supervisor, Human Resources and Legal Services

RE: Updated Policy – Second Read

The Policy Committee¹ recommends adoption of the revised policy #3220 – Professional Staff Evaluation

A first read of the policies was done during the Board's regular meeting on July 30, 2025, which included highlights of the proposed changes.

Enclosure

¹ Steve Olsen (Board Trustee), Mary Jane Tramontin (President), Naomi Norman (Superintendent), Brian Marcel (Associate Superintendent), Cherie Vannatter (Deputy Superintendent), Cassandra Harmon-Higgins (Executive Director of Human Resources and Legal Services), and Becky Mullins (Supervisor of Human Resources and Legal Services)

Book: Policies for ISD Update

Section: ~~Special Update - November 2023~~

Title: PROFESSIONAL STAFF EVALUATION

Code: po3220

Status: Active

3220 - PROFESSIONAL STAFF EVALUATION

“Professional Staff” for the purpose of this policy is defined in Policy 3120. “Teacher” shall be defined as per the Michigan Teacher Tenure Act. “Instructional staff” shall mean an employee that is subject to the Federation of WISD Employees, Unit II, collective bargaining agreement.

The Board of Education, through the powers derived from the School Code and other relevant statutes, is responsible for the employment and discharge of all personnel. To carry out this responsibility, with involvement of professional staff, the Board delegates to the Superintendent the function of establishing and implementing a rigorous, transparent, and fair performance evaluation system that does at least all of the following:

A. all employees, upon employment and at the beginning of each school year, will be apprised of the specific evaluative procedures and criteria prior to conducting any formal evaluation;

~~A.B.~~ _____ evaluates the employee's job performance in a year-end evaluation, while providing timely and constructive feedback.

~~Teachers~~ Professional staff rated ~~highly effective or, as of July 1, 2024,~~ effective on the three (3) most recent consecutive year-end evaluations ~~may will be~~ evaluated at least every three (3) years ~~every other year or, as of July 1, 2024, every third year, at the District's discretion.~~

~~B.C.~~ _____ for teachers, establishes clear approaches to measuring student growth and provides professional staff with relevant data on student.;

~~C.D.~~ _____ evaluates an employee's job performance, ~~using rating categories of highly effective, effective, minimally effective, and ineffective prior to July 1, 2024 and~~ using rating categories of effective, developing, and needing support ~~as of July 1, 2024,~~ which, for teachers, take into account student growth and assessment data or student learning objectives.

~~Before the 2024-2025 school year, forty percent (40%) of the annual year-end evaluation shall be based on student growth and assessment data. Beginning in the~~

~~2024-2025 school year, t~~Twenty percent (20%) of the year-end evaluation must be based on student growth and assessment data or student learning objectives metrics.

Evaluations must also comply with the following:

1. The portion of an ~~teacher's~~ instructional employee's year-end evaluation that is not based on student growth and assessment data or student learning objective metrics shall be based primarily on their performance as measured by an evaluation tool that is based on objective criteria ~~a teacher's performance as measured by the District.~~
2. ~~Prior to July 1, 2024, for core content areas in grades and subjects in which state assessments are administered, fifty percent (50%) of student growth must be measured using the state assessments, and the portion of student growth not measured using state assessments must be measured using multiple research-based growth measures or alternative assessments that are rigorous and comparable across schools within the District. Student growth also may be measured by student learning objectives or nationally normed or locally adopted assessments that are aligned to state standards, or based on achievement of individualized education program goals.~~
3. ~~Prior to July 1, 2024, the portion of a teacher's evaluation that is not measured using student growth and assessment data or using the evaluation tool developed or adopted by the District shall incorporate criteria enumerated in section M.C.L. 380.1248(1)(b)(i) to (iii) that are not otherwise evaluated under the tool. (See Policy 3131) After July 1, 2024, the portion of a teacher's evaluation that is not measured using student growth and assessment data or student learning objectives metrics, or using the evaluation tool developed or adopted by the District, must be based on objective criteria.~~
4. ~~Prior to July 1, 2024, if there are student growth and assessment data available for a teacher for at least three (3) school years, the annual year-end evaluation shall be based on the student growth and assessment data for the most recent three (3) consecutive school-year period. If there are not student growth and assessment data available for a teacher for at least three (3) school years, the annual year-end evaluation shall be based on all student growth and assessment data that are available for the teacher.~~
-
2. ~~As of July 1, 2024, the following apply:~~ Evaluations and feedback concerning the evaluation must be provided in writing to the employee ~~teacher~~; if a written evaluation is not provided, the employee ~~teacher~~ is deemed effective. ~~if required by circumstances described in M.C.L. 380.1249, a teacher must be designated as~~

~~unevaluated; and if a teacher receives an unevaluated designation, the teacher's rating from the immediately prior school year must be used.~~

3. Instructional staff must not be assigned an evaluation rating and must be designated as unevaluated for a school year if any of the following apply to the employee:

- i. The employee worked less than sixty (60) days in that school year;
- ii. The employee's evaluation results were vacated through the grievance procedure described in MCL 380.1249(1);
- ~~+~~iii. There are extenuation circumstances and the employee and the employer agree to designate the professional staff member as unevaluated.

If instructional staff receive an unevaluated designation, the employee's rating from the immediately prior school year must be used for any public reporting purposes.

~~D.~~E. _____ uses the evaluations, at a minimum, to inform decisions regarding ~~all of the~~ following:

~~1.~~ the effectiveness of employees, so that they are given ample opportunities for improvement.

~~2. prior to July 1, 2024, promotion, retention, and development of employees, including providing relevant coaching, instruction support, or professional development, and after July 1, 2024, development of employees, including providing relevant coaching, instruction support, or professional development~~

~~3. prior to July 1, 2024, whether to grant tenure or full certification, or both, to employees, using rigorous standards and streamlined, transparent, and fair procedures~~

~~4. prior to July 1, 2024, removing ineffective tenured and untenured employees after they have had ample opportunities to improve, and providing that these decisions are made using rigorous standards and streamlined, transparent, and fair procedures~~

~~E.~~F. provides a mid-year progress report for every teacher who is in the first year of probation or has received a rating of ~~minimally effective or ineffective or, after July 1, 2024,~~ needing support or developing on the most recent year-end evaluation

This mid-year report shall supplement and not replace the year-end evaluation. The mid-year report shall:

1. ~~prior to July 1, 2024,~~ be based, at least in part, on student growth and assessment data or student learning objective metrics~~achievement;~~
2. be aligned with the teacher's individualized development plan;
3. include specific performance goals and any recommended training for the remainder of the school year, as well as a written improvement plan developed in consultation with the teacher that incorporates the goals and training.

~~F.~~G. For instructional staff, includes ~~classroom~~ observations in accordance with the following:

1. If an employee is to be observed, an employee will be informed in advance of the day on which he/she/they are to be observed for one of their scheduled observations, in order that the objectives or purposes of the work activity period being observed may be discussed in advance between the parties. Monitoring of employee performance shall be done openly and with the full knowledge of the employee at the time of the observation;
- ~~1.~~2. must include review of the lesson plan, State curriculum standards being taught, and student engagement in the lesson and, ~~as of July 1, 2024,~~ the items described in this paragraph must be discussed during a post-observation meeting between the observer and the ~~employee~~teacher;
- ~~2.~~3. must include multiple observations unless the instructional staff member~~teacher~~ has received an effective or ~~higher~~ rating on the last two (2) year-end evaluations;
- ~~3.~~4. observations need not be for an entire class period but,~~as of July 1, 2024~~ must not be less than fifteen (15) minutes;
- ~~4.~~5. Additional observation(s) may be scheduled or ~~one (1) observation may be~~ unscheduled;
- ~~5.~~6. the school administrator responsible for the ~~teacher~~employee's performance evaluation shall conduct at least one (1) of the observations;

Other observations may be conducted by other observers who are trained in the use of the evaluation tool as described below. The employee shall have the subsequent right to be observed by a second supervisor and or Administrator

mutually agreed upon by the Federation and the Employer, when so requested by the employee.~~These other observers may be teacher leaders.~~

~~6.7.~~ the District shall ensure that, within thirty (30) calendar days after each observation, the teacher is provided with written feedback from the observation

~~G.H.~~ for the purposes of conducting annual year-end evaluations under the performance evaluation system, the District will adopt and implement one (1) or more of the evaluation tools for teachers that are included on the list established and maintained by the Michigan Department of Education ("MDE")

~~The e~~ Evaluation tool(s) shall be used consistently among the schools operated by the District so that all similarly situated ~~teachers~~ professional staff are evaluated using the same evaluation tool.

~~H.I.~~ the District will post on its public website all of the following information about the measures it uses for its performance evaluation system for teachers:

1. The research base for the evaluation framework, instrument, and process or, if the District adapts or modifies an evaluation tool from the MDE list, the research base for the listed evaluation tool and an assurance that the adaptations or modifications do not compromise the validity of that research base.
2. The identity and qualifications of the author or authors or, if the District adapts or modifies an evaluation tool from the MDE list, the identity and qualifications of a person with expertise in teacher evaluations who has reviewed the adapted or modified evaluation tool.
3. Either evidence of reliability, validity, and efficacy or a plan for developing that evidence or, if the District adapts or modifies an evaluation tool from the MDE list, an assurance that the adaptations or modifications do not compromise the reliability, validity, or efficacy of the evaluation tool or the evaluation process.
4. The evaluation frameworks and rubrics with detailed descriptors for each performance level on key summative indicators.
5. A description of the processes for conducting classroom observations, collecting evidence, conducting evaluation conferences, developing performance ratings, and developing performance improvement plans.
6. A description of the plan for providing evaluators and observers with training.

~~I.J.~~ the District shall also:

1. provide training to instructional staff~~teachers~~ on the evaluation tool(s) used by the District in its performance evaluation system and how each evaluation tool is used

This training may be provided by a district or by a consortium consisting of the District, the intermediate school district, or a public school academy.

2. ensure that training is provided to all evaluators and observers

The training shall be provided by an individual who has expertise in the evaluation tool or tools used by the District, which may include either a consultant on that evaluation tool or framework or an individual who has been trained to train others in the use of the evaluation tool or tools. The District may provide the training in the use of the evaluation tool or tools if the trainer has expertise in the evaluation tool or tools.

3. by not later than September 1, 2024, and every three (3) years thereafter, each individual who conducts an evaluation of a teacher shall complete rater reliability training provided by the District that complies with M.C.L. 380.1249

The staff evaluation program shall aim at the early identification of specific areas in which the individual professional staff member needs help so that appropriate assistance may be provided or arranged for. At any observation conference and on the written evaluation, the administrator/evaluator will avoid generalities and specifically point out the employee's strengths and weaknesses and suggestions for improvement. A supervisor offering suggestions for improvement to a professional staff member shall not release that professional staff member from the responsibility to improve. If a professional staff member, after receiving a reasonable degree of assistance, fails to perform assigned responsibilities in a satisfactory manner, dismissal, or non-renewal procedures may be invoked. A teacher rated as ~~ineffective or, as of July 1, 2024,~~ needing support on three (3) consecutive year-end evaluations must be dismissed from employment as a teacher with the District. In such an instance, all relevant evaluation documents may be used in the proceedings.

~~Prior to July 1, 2024, if a non-probationary teacher is rated as ineffective on an annual year-end evaluation, the teacher may request a review of the evaluation and the rating by the Superintendent. The request for a review must be submitted in writing within twenty (20) days after the teacher is informed of the rating. Upon receipt of the request, the Superintendent shall review the evaluation and rating and may make any modifications as appropriate based on review. However, the performance evaluation system shall not allow for a review as described in this subdivision more than twice in a three (3) school-year period.~~

~~-~~
After July 1, 2024, if an instructional staff member~~teacher~~ that is not probationary is rated as needing support, the staff member~~teacher~~ may request a review of the evaluation rating by the

superintendent. ~~must be provided with the options related to review of the evaluation, including a written response~~

1. The request for review must be submitted in writing thirty (30) calendar days after the employee is informed of the rating. Upon receipt of the request, the superintendent shall review the evaluation and rating and make any modifications as appropriate.
2. The employee must receive a written response regarding this review by no later than thirty (30) days after the receipt of the request for review and before making any modifications.
3. If the written response does not resolve the matter, the employee or the Federation may request mediation as provided for in 1947 PA 336, 423.201 to 423.217. The request for mediation must be submitted in writing within thirty (30) calendar days after the employee receives the written response from the school district. Within fifteen (15) days of the receipt of the request, the superintendent must provide written response to the employee and the Federation stating the mediation will be scheduled as appropriate.

An instructional staff member that is not probationary is rated as needing support on two (2) consecutive year-end evaluations may use the contract's grievance procedure, including arbitration, if applicable, to grieve the second evaluation rating. If the collective bargaining agreement does not contain a grievance procedure that ends in binding arbitration, the teacher may request binding arbitration by filing a demand for arbitration with the American Arbitration Association within thirty (30) calendar days after the teacher receives the grievance process written response from the Superintendent. The arbitration is subject to the Uniform Arbitration Act, 2012 PA 371, MCL 691.1681 to 691.1713. The arbitration must adhere to both of the following:

1. The arbitrator must be selected through procedures administered by the American Arbitration Association in accordance with its rules.
2. The arbitrator has the authority to issue any appropriate remedy.

~~, the ability to request mediation, and when appropriate, utilization of the grievance process or binding arbitration as set out in M.C.L. 380.1249.~~

The District shall not assign a student to be taught in the same subject area for two (2) consecutive years by a teacher who has been rated as ~~ineffective or, after July 1, 2024, as~~ needing support on the teacher's two (2) most recent annual year-end evaluations. If the District is unable to comply with this and plans to assign a student to be taught in the same subject area for two (2) consecutive years by a teacher who has been rated as ~~ineffective or, after July 1, 2024, as~~ needing support on the teacher's two (2) most recent annual year-end evaluations, the Board will notify the student's parent or legal guardian in writing not later than July 15 immediately preceding the beginning of the school year for which the student is assigned to the teacher, that the District is unable to comply and that the student has been assigned to be taught in the same subject area for a second consecutive year by a teacher who has been rated as ~~ineffective or, as of July 1, 2024, as~~ needing support on the teacher's two (2) most recent annual year-end evaluations. The notification shall include an explanation of why

the Board is unable to comply. ~~After July 1, 2024, if~~ a teacher requests a review of the teacher's evaluation under the amendments to the statute, the Board must not issue the notification until the review process is complete.

Evaluations shall be conducted of each professional staff member as stipulated in the Teacher Tenure Act (if applicable), the revised School Code, a negotiated agreement or contract, Staff Manual, the Superintendent's administrative guidelines, and as directed by the Michigan Department of Education. A professional staff member shall be given a copy of any documents relating to the staff member's performance which are to be placed in the personnel file. The employee may provide comments, which shall be attached to the final evaluation. All copies of the final evaluations will be signed by both the employee and the evaluator. There shall be no additions, deletions, or corrections after the signatures are affixed. Copies of evaluations shall be furnished to prospective employers upon written request of the employee and at the employee's expense.

This policy shall not deprive a professional staff member of any rights provided by State law or contractual rights consistent with State law.

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Legal References

M.C.L. 380.1249 (as amended)

Coversheet

Update Head Start/GRSP Policies – Second Read

Section:	VI. New Business
Item:	B. Update Head Start/GRSP Policies – Second Read
Purpose:	
Submitted by:	
Related Material:	Active Supervision.pdf Disability Referral Process.pdf Home-Based Attendance Policy.pdf Transportation Policy.pdf Van Usage Policy.pdf

**WASHTENAW INTERMEDIATE SCHOOL DISTRICT
OPERATIONAL POLICIES AND PROCEDURES
HEALTH PROGRAM SERVICES**

Performance Standard: 1302.47 (5)(iii)	GSRP Implementation Manual Section: Classroom Requirements – Class Size and Ratio	Licensing #: R400.8125 (1) R400.8158 (2)(a)
Early Childhood Executive Director or Designee Approval Date:	Policy Council Approval Date:	Governing Board Approval Date:
Pages: 7	Effective Date: 9/1/24	Date of Last Revision:

SUBJECT: Active Supervision

OPERATIONAL POLICY:

A program must establish, train, implement, and enforce a system of safety practices that ensure children are always kept safe. The safety of all children is the highest priority. It is everyone's responsibility to ensure that all children are accounted for and safe. All classroom staff are required to know the number of children in their care and the location of each child at all times. All Licensing and Regulatory Affairs (LARA) and WISD guidelines regarding staff to child ratios must be followed at all times.

OPERATIONAL PROCEDURE (procedure subject to change):

All staff in each classroom will count the number of children present in the classroom/group each time a child enters or exits the classroom for whatever reason. Children as a group or individual children must be counted and accounted for each time a threshold is crossed. A threshold is defined as an entrance or exit/doorway. An example of crossing a threshold would be exiting the classroom (doorway) and entering the gym/gross motor room or bathroom (doorway). The process would be repeated when exiting the gym/gross motor room or bathroom (doorway) and re-entering the classroom (doorway). A face to name head count will be implemented and documented at the beginning and end of the day, at any division of the group of students, and before and after transitioning to the playground, and will be documented on the tracking form.

Required Tools for Maintaining Head Count in the Classroom

1. White Boards

- a. White boards will be used to track the total number of children currently present in the classroom.
- b. White boards do not need to list the total number of children enrolled in the classroom, only those currently present.
- c. White boards will be updated throughout the day (e.g., for children who arrive late/leave early, leave the classroom with an adult, etc.)

2. Picture-based System

- a. A picture-based system will be posted and used in the classroom in addition to the count on the white board. (Note: staff will periodically update children's photos during the school year if/when there is change/growth)

- b. This system will reflect whether a child is absent or present as well as the child's location.
- c. When a child or children (less than half of the children/group) leave the classroom, this picture-based system will be used to track children's transitions in and out. The number on the white board will reflect this change as well.

Steps for maintaining head count when children are in another learning environment

1. A laminated portable picture board will be transported with the group when the class leaves the classroom. This will be used to account for any child or children (less than half of the children/group) who separate from the group. (e.g., The class is on the playground, but a child needs to leave to use the bathroom, see the nurse, etc.).
2. During transitions into and out of the classroom, there will be a teacher at the front and rear of the group when possible.

Steps to be taken when children are moving outside of the classroom

1. **A count and roll call should be taken.** Take a count/roll call before leaving the area. The count total and names should agree with the information listed on the Name to Face Tracking Sheet.
2. **Check for all children.** One teacher checks the area for children who are not in the group. If indoors, check all bathrooms and other possible "hiding" areas. If outdoors, check equipment, especially those with tunnels, houses, etc.
 - a. Do not leave the area until all the children are accounted for.
 - b. If help is needed, call the Director/Principal for assistance.
3. **Write the count on your tracking sheet and initial.**
4. **Upon crossing any threshold count the children and take another roll call.** Count the children upon entering the new area (e.g., playground, classroom, or common area) and take another roll call. The total and names should agree with the information written on the tracking sheet for step 3 above. Initial.
5. **Account for all children arriving or departing throughout the day.** Note on the tracking sheet the time and circumstance for every child who arrives or departs from the group. For example,
 - a. *Allison departed with her mother, 12:30 p.m.; returned 1:30 pm*
 - b. *Patrick joined the group, at 3:45 pm*
 - c. The classroom sign in sheet should always match the number of children in the classroom.
6. **Before leaving the room/playground, take a count/roll call.** The total and names should agree with the information you wrote on the tracking sheet.

7. **Check for all children.** One teacher should walk around the area to check for any children not in the group.
 - a. Do not leave the area until all the children are accounted for.
 - b. If help is needed, call the Director/Principal for assistance.
8. **Upon entering a room/playground count the children and take a roll call.** The total and names should agree with the information written on the tracking sheet.

Transitioning to and from Transportation

Documentation should be maintained for children entering and exiting the bus. Documentation should include verification that transportation staff have received and released children to center staff and/or parent(s). Adult/child ratio on the bus is 1:10 (bus driver can be included in this ratio).

Non-Classroom Staff

If a child is found to be separated from their classroom, the child should be taken immediately to the Director/Principal. The Director/Principal will immediately take steps to determine whose classroom the child belongs with and return the child to that group. If the Director/Principal is not available, the Family Support Specialist or other assigned personnel will take on that role.

Supervision

ALL staff must receive Active Supervision training within the first 30 days of the start of the program year, or within 30 days of hire for new employees hired later within the year. The content for this training will be provided to all programs by WISD. All training documentation, including a sign in sheet, must be uploaded into ChildPlus.

Substitute Teaching staff must receive Active Supervision training prior to subbing in a classroom. This may be conducted by the center staff as designated by the program Director/Principal. Teaching staff supervise preschool children primarily by sight. Supervision for short intervals by sound is permissible if teachers conduct frequent and on-going checks on children who are out of sight (i.e., in the library area, toileting, or napping). Teaching staff are aware and position themselves in the classroom and on the playground (see *Playground Supervision Policy*) to ensure that they have a view of children and are actively engaged. However, when possible, staff should supervise by positioning themselves to see as many children as possible.

Note: Children are never to be allowed out of the classroom without adult supervision, i.e., to go to the office as an errand or to a cubby in the hallway.

Opening and Closing Supervision

During opening and closing, there should always be at least two staff in the building when children are present. If a child is at the center/school after closing hours, two staff must remain. One may be a member of the leadership team.

Notifications

Staff must notify the center Director/Principal immediately if a child is found unsupervised or if staff cannot account for a child.

Parents/Caregivers must be notified of the incident and provided with support by the subrecipient staff or connection to outside resources as requested and available to them and their child.

A center must make a verbal report to the Department of Child Care Licensing within 24 hours of the occurrence of any child that was lost or left unsupervised.

A center must notify the Washtenaw ISD Early Childhood Executive Director within 24 hours of the occurrence of any child that was lost or left unsupervised.

The WISD Mental Health/Behavioral Support Specialist should be notified. Parents/Caregivers should be provided with this person's contact information to allow them to contact the specialist directly, if needed.

Consequences

Without exception, any staff person found responsible for leaving a child unattended will receive disciplinary action.

Ongoing Monitoring

Center management or designee must ensure that policies are being implemented consistently by verifying Attendance Sheets at various times during the day. The Active Supervision Monitoring Checklist will be completed once during the first week of school and monthly thereafter, following this schedule:

- First week of school in September & January: Early Childhood Specialist
- October and March: WISD Health Specialist
- November, December, February, April & May: Center Management or designee

This will be documented on an Active Supervision Monitoring Checklist form and uploaded into ChildPlus.

The expectations outlined on this Checklist are:

1. At all times, teachers must know how many children and which children are in their classroom regardless of primary caregiving situations.
2. Teachers must know how many children and which children are in their classroom without stopping to count.
3. Staff follow program procedures listed above including the use of whiteboard, picture-based tracking systems and name to face tracking.
4. Staff members must communicate with one another to maintain accountability for all children at all times and should contact a supervisor immediately if the classroom is out of ratio.
5. Children must be counted at each major transition (going outdoors, coming indoors to include going and coming from bus) using the Name to Face Tracking Sheet. A roll call (verbally

calling out each child's name) will also be done at this time. The count and roll call will be verified on the Tracking Sheet and initialed by the teachers involved.

6. The classroom environment must be set up so that staff can see children easily.
7. Whether inside the classroom or in another area, staff will scan the environment to know where children are and should be positioned to be able to see children.

Additionally, substitutes and other staff working in the classroom or program must be oriented to the procedure for tracking children.

If, upon completion of the Active Supervision Monitoring Checklist, a classroom is found to be not utilizing all aspects of the Child Head Count procedures outlined above, the Director/Principal should be notified immediately. WISD and program staff will work together to provide support and any materials needed to bring the classroom/staff into compliance. A repeat Active Supervision Monitoring Checklist will be completed within the following two weeks to show that corrections were made and that there is adherence to the policy.

All Active Supervision Monitoring Checklists should be entered into Child Plus per the instructions below.

Entering Active Supervision Monitoring Checklist into ChildPlus

Under the "Management" tab, select "Active Supervision Checklist *program year*". This will bring up all completed Monitoring Checklists that have previously been entered. Select the green button to Add Active Supervision Monitoring Checklist.

ChildPlus Desktop

Services To-Do List Entry Express **Management** Dashboard Reports Setup Enter Report # TRY CHILDPLUS ONLINE Community Help

Personnel Professional Development* Community Resources In-Kind PIR Internal Monitoring Fees CLASS® Active Supervision Checklist 2024-2025 Advisory Committees Agency Documents

ChildPlus Training Request Classroom Teaching Staff Change Request Community Partnership Agreements 24-25 Community Resource Requests Daily Desk References EHS Forms EHS Socializations

Enrollment Information Updates Family / Volunteer Training Forms Menus New Staff Request Parent Communication 2024-2025 Parent Handbook Parent/Policy Committee Policies/Procedures Policy Council

Program Calendar Recruitment 2024-2025 Selection 2024-2025

Active Supervision Checklist 2024-2025

Active Supervision Monitoring Checklist 2024-2025 Print All Records Add Active Supervision Monitoring Checklist

Drag a column header here to group by that column

Staff member filling out f...	Agency-Site-Classroom	Date	Time	Teacher:	Assistant:	Part of daily routine:	# of stu
No records have been entered. Click "Add Active Supervision Monitoring Checklist" above to add one.							

A new window will pop up with the form. Complete all fillable sections and upload the paper version, if applicable. Scroll back to the top to select “Save.”

Active Supervision Monitoring Checklist

Print Save Cancel Add

Active Supervision Monitoring Checklist

Use this checklist when monitoring Active Supervision Policies and Procedures.

Agency-Site-Classroom

< No Agency > < No Site > < No Classroom >

Entering Active Supervision Training Sign In Sheets into ChildPlus

Under the “Management” tab, select “Professional Development,” then select “Trainings.” Search for the appropriate Active Supervision Trainings tab for school district and program year:

Name	Service Area	Format	Active	Legacy
ACTIVE SUPERVISION TRNG AA 24-25	Health		<input checked="" type="checkbox"/>	<input type="checkbox"/>
ACTIVE SUPERVISION TRNG LINC 24-25	Health		<input checked="" type="checkbox"/>	<input type="checkbox"/>
ACTIVE SUPERVISION TRNG WL 24-25	Health		<input checked="" type="checkbox"/>	<input type="checkbox"/>
ACTIVE SUPERVISION TRNG YPSI 24-25	Health		<input checked="" type="checkbox"/>	<input type="checkbox"/>

Click on the tab, then select “Details,” then “Attachments:”

ACTIVE SUPERVISION AA 23-24

Details

Attachments

Attendees

Details

Service Area

Level

Location

Location Note

ACTIVE SUPERVISION AA 23-24

Health

Health

Off-Site

☒ Active

Agency

Required

Ann Arbor Public Schools

Format

Credit Type

Credit Hours

Hours

0

0

Training Notes

Save

Cancel

Select “Add Attachment” then “Select File” to attach your file, then select “Save.”

ACTIVE SUPERVISION AA 23-24

Attachments ▾

This Training does not have any attachments.

Add Attachment

Options

Save

Cancel

DRAFT

ACTIVE SUPERVISION MONITORING CHECKLIST

Use this checklist when monitoring Active Supervision Policies and Procedures.

Classroom # _____ Date: _____ Time: _____

Teacher: _____ Assistant: _____

Part of daily routine: _____

of students present: _____ # of students absent: _____

of students away from group: _____

Observed	Not Observed	N/A	
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Staff member can state the number of children under their supervision and account for students not with the group.
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Staff member counts the children under their supervision by matching name to face.
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Staff member follows the program's standard procedures. <ul style="list-style-type: none"> - Tracking forms are being completed for each transition observed. - White boards are being used. - Classroom has student's pictures and are being moved when student leaves classroom.
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Staff member communicates with co-workers to ensure accountability for children is maintained.
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Staff member informs supervisors immediately if the classroom or program area is over ratio.
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Staff members are positioned to be able view children.
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Classroom Environment is set up so that staff can supervise children.
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Staff are scanning the environment to know where students are at.

Notes/Comments:

Reviewer's Signature: _____

Classroom Staff Signature: _____

**WASHTENAW INTERMEDIATE SCHOOL DISTRICT
OPERATIONAL POLICIES AND PROCEDURES
DISABILITY SERVICES**

Performance Standard #: 1302.33	GSRP Implementation Manual Section: Classroom Assessment Section	Licensing #: N/A
Executive Director or Designee Approval Signature: Date:	Policy Council Approval Signature: Date:	Operational Policy Approval Signature: Date:
Page(s): 6	Effective Date: 9/1/24	Date of Latest Revision:

SUBJECT: Disability Referral Process – Classroom and Home-based

OPERATIONAL POLICY:

The Individuals with Disabilities Education Act (IDEA) along with Michigan Administrative Rules for Special Education (MARSE), require programs to identify, locate and evaluate all children with disabilities, from birth through 21 years of age, who are in need, or may be in need, of special education and related services. Programs will identify children with suspected disabilities using the established screening and ongoing assessment policy and procedures and refer children for further evaluation and determination of special education eligibility.

OPERATIONAL PROCEDURE (procedures are subject to change):

Program staff will identify children with suspected disabilities and facilitate referrals to Early On (birth -3) and Special Education (Over age 3). Screenings, ongoing assessment, anecdotal notes, case notes, on-going observations and/or parent concerns will be the documentation used to support the referral for evaluation. The classroom teacher will consult with the parent, sharing all relevant information, and initiate the referral to the appropriate program.

For LEAs operating Head Start and/or GSRP:

1. Following the identification of a child with a suspected disability and discussion with the parents/guardians, program staff will initiate their district's referral procedure.
2. Provide all relevant screening and assessment data to the appropriate special education team members. Head Start and GSRP teaching teams will be represented and included in the Individual Education Plan (IEP) team process.

For community-based partners operating GSRP:

1. Following the identification of a child with a suspected disability and discussion with the parents/guardians, program staff will assist families in completing a Build Up MI Referral. The referral will be sent to the appropriate LEA based on their home address and resident district.

2. Provide all relevant screening and assessment data to the parents/guardians, requesting that they:
 - a. Share screening and assessment data with the evaluation team
 - b. Complete necessary paperwork to provide consent to speak with the teaching team
 - c. Request that a member of the teaching team or other program representative be included as a member of the Individual Education Plan (IEP) team

For programs operating Center-based or Home-based Early Head Start:

1. Following the identification of a child with a suspected disability and discussion with the parents/guardians, program staff will facilitate a referral to the WISD Early On program.
2. Provide all relevant screening and assessment data to the parents/guardians and the Early On team and request that parent/caregivers:
 - a. Complete necessary paperwork to provide consent to speak with the teaching team
 - b. Include a member of the teaching team on the Individualized Family Services Plan (IFSP) team

Use the resources and links below to submit a referral:

To submit an **Early On** referral:

- Center-based programs will submit a referral through the [Early On Michigan website](#) using the link provided.
- Home-based programs will submit a referral to the WISD Early Intervention Coordinator.

To submit a **Special Education** referral through [BuildUp MI](#) using the link provided.

ChildPlus Data Entry Instructions:

When screening and/or assessment data indicates that a child may potentially have a developmental delay it must be documented under the Disability Tab as a Concern by:

1. Select the Disability Tab (outlined in green)
2. Click on “Concerns” (outlined in blue)
3. Click the green Add Concern button (outlined in red)

ance Birth **Disability** Education Enrollment Family Services Health Immunizations Mental Health PIR Transportation

hments **Concerns** IEP IFSP PIR

Add Concern

not have any concerns. Use the Add Concern button to create one.

To complete the concern:

1. Add the date the concern was identified, the Category/developmental domain of concern, the status of the concern (should be “Intervention or Referral Needed” when a referral is being made), and the name of the staff person responsible for the referral and follow-up (outlined in green)
2. Under Activity Notes, provide a brief overview of the concern (outlined in blue)
3. Click the green Save button (outlined in red)

Add Concern

Date Identified
Required 5/14/2025

Category Social Emotional

Status Intervention or Referral Need...

LEA or Part C Agency

Responsible Staff Kruk, Alicia

Activity Notes

7/01/2025 4:16 p.m. Alicia Kruk Developmental and behavioral screenings indicate a potential developmental delay. Results can be found under the Education Tab.

Save Cancel Add

Once the Concern has been created, document the referral by:

1. Click Add Activity (outlined in green)

Concern ...

Date Identified* Date Closed**

Category Closed Reason**

LEA or Part C Agency

Activities

Complete	Activity	Date	Status
✓	Concern Identified	5/14/2025	Intervention or Referral Needed

7/01/2025 4:16 p.m. Alicia Kruk Developmental and behavioral screenings indicate a potential developmental delay. Results can be found under the Education Tab.

*To edit Date Identified, edit the Concern Identified activity.
 **To edit Date Closed or Closed Reason, edit the Concern Closed activity.

2. Enter the Activity Date, add the name of the individual responsible for submitting and following up on the referral in the Responsible Staff box and add an Activity Note providing a brief overview of the Activity (outlined in green)

Concern Activity

Activity Date Required

Activity Type Required

Status

Responsible Staff

Activity Notes

7/01/2025 4:32 p.m. Alicia Kruk Submitted referral to our special education team.

3. In the Activity Type field, click the dropdown and the appropriate referral type as indicated here:
 - a. For LEA's operating Head Start or GSRP, select Referral - Internal (outlined in blue)
 - b. For community partners operating GSRP, select Referral - External (outlined in red)
 - c. For children enrolled in the Home-based Early Head Start program, select Referral - Internal (outlined in blue)
 - d. For children enrolled in a Center-based Early Head Start classroom, programs will select Referral - External (outlined in red)

Concern Activity

Activity Date
Required

5/20/2025

Activity Type
Required

Referral - Internal

Referred To

Diagnosis

Referral for Evaluation

☐ Referred for evaluation

If a child did not receive an evaluation, please select the primary reason:

Primary Reason PIR

Status

Responsible Staff

Kruk, Alicia

Activity Notes

7/01/2025 4:32 p.m. Alicia Kruk Submitted referral to our special education team.

Add Notes

OK

Cancel

4. Under Referral for Evaluation, check the Referred to evaluation to determine IDEA eligibility (outlined in green)
5. Click the green OK button (outlined in blue)

Concern Activity

Activity Date
Required

5/20/2025

Activity Type
Required

Referral - Internal

Referred To

Referral for Evaluation

☒ Referred for evaluation to determine IDEA eligibility PIR

Status

Responsible Staff

Kruk, Alicia

Activity Notes

7/01/2025 4:32 p.m. Alicia Kruk Submitted referral to our special education team.

Add Notes

OK

Cancel

- To ensure that your changes are saved, click the green Save button (outlined in red)

Concern

Date Identified*

5/14/2025

Date Closed**

Category

Social Emotional

Closed Reason**

LEA or Part C Agency

Add Activity

Complete	Activity	Date	Status
✓	Referral - Internal	5/20/2025	
	7/01/2025 4:32 p.m. Alicia Kruk Submitted referral to our special education team.		
✓	Concern Identified	5/14/2025	Intervention or Referral Needed
	7/01/2025 4:16 p.m. Alicia Kruk Developmental and behavioral screenings indicate a potential developmental delay. Results can be found under the Education Tab.		

*To edit Date Identified, edit the Concern Identified activity.

**To edit Date Closed or Closed Reason, edit the Concern Closed activity.

Close Concern

Save

Cancel

**WASHTENAW INTERMEDIATE SCHOOL DISTRICT
OPERATIONAL POLICIES AND PROCEDURES
ELIGIBILITY, RECRUITMENT, SELECTION, ENROLLMENT, ATTENDANCE**

Performance Standard #: 1302.22(c)	GSRP Implementation Manual Section: N/A	Licensing #: N/A
Executive Director or Designee Approval Date:	Policy Council Approval Date:	Governing Board Approval Date:
Page(s):	Effective Date:	Date of Latest Revision:

SUBJECT: Attendance in Home-Based Option

OPERATIONAL POLICY:

Home-based participants must be provided a minimum of 46 home visits scheduled weekly and lasting 90 minutes during the program year. Home-visitors must implement strategies to promote attendance and a process to ensure children and families are safe and are not experiencing barriers to participation. Home Visits canceled by the program or home visitor must be made up. Missed and canceled home visits need to be rescheduled to meet this minimum requirement.

OPERATIONAL PROCEDURE (procedure subject to change):

Home-based WISD staff (Home-Based Parent Educators and Family Support Specialists) must implement a process to ensure that children and families are safe when they cancel, or when they are not present for a home visit. If a family is not at home when the home visitor arrives for a home visit, the program home visitor must attempt to contact the family to ensure the child's well-being and determine the reason for the absence. A make-up home visit will be scheduled.

If a family's attendance rate falls below 75% (missing an average of one home visit per month) two months, the program must analyze the cases of absenteeism.

The analysis must include:

1. A study of the pattern of absences for the child, including the reasons for absences as well as the number of absences that occur.
2. A study of patterns and trends in the program and on individual caseloads that relates to absences.
3. A review and reflection on the parent/caregiver and home visitor relationship and history.

Following the analysis of absenteeism, an attendance plan must be developed. The family will have one month following the date of the attendance plan to show improvement. If an improvement is not made within two months of the attendance plan, the family will be exited from the program, and a new family will be selected from the waitlist.

If no contact has been made with the family and was attempted and documented with no response in 30 days, a letter must be sent to the family notifying them that if they do not schedule a home visit within 7 days of the date of the letter, they will be exited from the program. All communication must be documented in Child Plus, and a copy of the letter must be attached in the Enrollment tab.

OPERATIONAL PROCEDURE (Subject to change as needed):

Home visits cancelled by the family or WISD staff must be rescheduled. In order to mitigate low attendance rates for participants, the following steps will be taken:

Home Visits Cancelled by the Family:

A family can receive up to 11 (25%) home visits virtually in a program year, counting toward the required 46 home visits. Virtual home visits are allowable to avoid a cancellation due to illness in the home and to make up missed home visits.

Illness in the home:

If a home visit is cancelled due to an illness in the family, a virtual home visit should be offered in its place. If the family declines a virtual home visit during their scheduled home visit, the visit must be made up either virtually or in person.

Scheduling Conflict (family has scheduled another appointment during the weekly home visit time)

If a family cancels a home visit due to a scheduling conflict, they must reschedule the home visit. It is ideal to schedule another time during the week, though this may not always be possible. If there is not another agreeable time for the family and home visitor during the week, it can be scheduled for the future.

If a family refuses to re-schedule a weekly home visit, or if a family refuses to schedule or reschedule a cancelled weekly home visit, the program must record the reason for the missed home visit. Staff will remind families of the attendance policy, and that cancelled home visits must be made up.

If a family is not present for a scheduled home visit and does not contact their home visitor to notify them, this will be counted as a “No Show”. Families with more than two “No Show” incidents during a program year will be exited from the program.

Home Visits Cancelled by Staff

Illness:

If a home visit is cancelled due to an illness of a staff member, an alternative date and time to make up the visit will be offered upon the staff member's return.

Training or Other Conflict:

If a home visit is cancelled due to a training or other scheduling conflict, an alternative date and time to make up the visit will be offered prior to the missed home visit. (Example: if staff has a training scheduled at the end of the month, the visit may be held prior to the training date, or a make-up date will be scheduled).

Snow Day:

If a home visit is cancelled due to a program closure for snow/weather days, an alternative date and time to make up the visit will be offered.

Promoting Regular Attendance:

1. Staff will inform families about program policies and attendance expectations. This should occur in several ways but not limited to:
 - o During the application process, orientation, home visits, parent/teacher conferences, newsletters, websites, flyers, and handbook.
2. Information provided should include but is not limited to:
 - o Why regular attendance is important for the child and family.
 - o How staff will follow up if there are unexplained absences/chronic absenteeism.
 - o Attendance Plans must be initiated and completed with families missing an average of one home visit (25%) per month.
3. Home visitors may send reminders to families via phone or text reminding them of scheduled home visits. A family does not have to confirm again that they have scheduled a home visit for it to occur. Home visitors are expected to plan for and travel to each home visit, even when a family does not reply to a reminder.

Attendance Tracking:

Home-based staff will enter attendance in ChildPlus, at a minimum, each week on Friday. See the operational procedure for Attendance Tracking for detailed instructions on data entry.

Monitoring:

1. WISD will run reports and review attendance twice a month to ensure all data is being entered. If any attendance is missing, the WISD ERSEA specialist will contact staff and follow up to ensure all data is being entered.

2. Program staff must have a system to run and review the above ChildPlus reports to be utilized for review and data. All reports utilized must be attached in internal monitoring each month.
3. A corrective action plan (CAP) will be created if found non-compliant/concern.

Home-based attendance will be monitored using the following ChildPlus Reports:

Report Number	Report Name	Guidance
2305	Monthly Attendance	To view an entire month's worth of attendance for a classroom and quickly determine which participants have an ADA below 85%
2330	Consecutive Absences	This report is designed to list participants who have had a certain number of consecutive absences. This report can be utilized by staff to figure out which families need to be contacted about excessive absenteeism.
1080	Attendance Improvement Plan	To track the number of plans created
2309	Absence Reasons	Displays statistics related to absences

**WASHTENAW INTERMEDIATE SCHOOL DISTRICT
OPERATIONAL POLICIES AND PROCEDURES
FINANCIAL AND ADMINISTRATIVE REQUIREMENTS - TRANSPORTATION**

Performance Standard: Subpart F - 1303	GSRP Implementation Manual Section: MDE Pupil Transportation Act of 1990	Licensing #: R400.8710, R400.8720, R400.8730, R400.8740, R400.8750, R400.8760, R400.8770
Early Childhood Executive Director or Designee Approval Date:	Policy Council Approval Date:	Governing Board Operational Policy Approval Date:
Page(s): 6	Effective Date:	Date of Latest Revision:

SUBJECT: Transportation

OPERATIONAL POLICY:

A program that provides transportation services must comply with all provisions of the Head Start Program Performance Standards and the State of Michigan Licensing rules and regulations. If a program does not provide transportation services, for all or a portion of the children, it must provide reasonable assistance. This includes providing information about public transit availability to the families of such children to arrange transportation to and from its activities and providing information about these transportation options in recruitment announcements.

Any individual providing transportation services to children in the Head Start and GSRP programs, whether they are employees of the sub-recipient or partner or are employed by a contracted transportation company, must complete background check requirements as described in the **Safety Practices Policy**.

OPERATIONAL PROCEDURE (subject to change):

Each agency must assist families who need transportation, in order for children to attend the program.

When an agency has decided not to provide transportation services, either for all or a portion of the children, it must provide reasonable assistance to the families of such children to arrange transportation to and from its activities. The specific types of assistance being offered must be made clear to all prospective families in the recruitment announcements.

Each agency providing transportation services is responsible for compliance with the applicable requirements of this policy. When an agency provides transportation through another organization or an individual, the agency must ensure the transportation provider complies with the requirements of this policy.

Each agency providing transportation services must ensure that each vehicle used in providing such services is equipped with:

1. a communication system to call for assistance in case of an emergency
2. safety equipment for use in an emergency, including a charged fire extinguisher that is properly mounted near the driver's seat and a sign indicating its location

3. a first aid kit and a sign indicating the location of such equipment
4. a seat belt cutter for use in an emergency evacuation and a sign indicating its location.
5. height- and weight-appropriate child restraint systems
6. a reverse beeper.

Each agency providing transportation services must ensure that any auxiliary seating, such as temporary or folding jump seats, used in vehicles of any type providing such services are built into the vehicle by the manufacturer as part of its standard design, are maintained in proper working order, and are inspected as part of the annual inspection required under Sec. 1310.13(a) of this subpart.

Each agency providing transportation services must ensure that all accidents involving vehicles that transport children are reported in accordance with applicable State requirements.

Each agency must ensure that children are only released to a parent or legal guardian, or other individual identified in writing by the parent or legal guardian. This regulation applies when children are not transported and are picked up from the classroom, as well as when they are dropped off by a vehicle. Agencies must maintain lists of these individuals, including alternates in case of emergency. Up-to-date child rosters must be maintained at all times to ensure that no child is left behind, either in the classroom or on the vehicle at the end of the route.

Each agency providing transportation must ensure that vehicles are maintained in safe operating condition at all times. The organization operating the vehicle must establish and implement procedures for:

1. a thorough safety inspection of each vehicle on at least an annual basis through an inspection program licensed or operated by the State
2. systematic preventive maintenance on such vehicles
3. daily pre-trip inspection of the vehicle by the driver

Each agency providing transportation services, either directly or through an arrangement with another organization or an individual, to children enrolled in its program must ensure that:

1. On a vehicle equipped for use of such devices, any child weighing 50 pounds or less is seated in a child restraint system appropriate to the height and weight of the child while the vehicle is in motion.
2. Baggage and other items transported in the passenger compartment are properly stored and secured, and the aisles remain clear, and the doors and emergency exits remain unobstructed at all times.
3. There must be at least one bus monitor on board at all times, with additional bus monitors provided as required, such as when needed to accommodate the needs of children with disabilities or to ensure the adult child ratio.

4. Except for bus monitors who are assisting children, all vehicle occupants must be seated and wearing height and weight- appropriate safety restraints while the vehicle is in motion.

Each agency providing transportation must ensure that people that drive vehicles, at a minimum:

1. Have a valid Commercial Driver's License (CDL) for vehicles in the same class as the vehicle the driver will be operating.
2. Meet any physical, mental, and other requirements established under applicable law or regulations as necessary to perform job-related functions with any necessary reasonable accommodations.

Each agency providing transportation services must ensure that there is an applicant review process for use in hiring drivers, that applicants for driver positions must be advised of the specific background checks required at the time application is made, and that there are criteria for the rejection of unacceptable applicants. The applicant review procedure must include, at minimum:

1. All elements specified in 45 CFR 1304.52(b), with additional disclosure by the applicant of all moving traffic violations, regardless of penalty.
2. A check of the applicant's driving record through the appropriate State agency, including a check of the applicant's record through the National Driver Register, as required by the State.
3. After a conditional offer of employment to the applicant and before the applicant begins work as a driver, a medical examination performed by a licensed doctor, establishing that the individual possesses the physical ability to perform any job-related functions with any necessary accommodation(s), must be obtained.

The agency must ensure that all drivers receive the required annual training prior to transporting any child enrolled in the agency's program.

1. Drivers must receive a combination of classroom instruction and behind-the-wheel instruction sufficient to enable each driver to:
 - a. operate the vehicle in a safe and efficient manner
 - b. safely run a fixed route, including loading and unloading children following the Active Supervision policy to account for each child by:
 - i. using name to face recognition,
 - ii. documenting each transition at every threshold, and,
 - iii. documenting during a staff or parent exchange of each child.
 - c. correctly stop at railroad crossings and perform other specialized driving maneuvers
 - d. administer basic first aid in case of injury
 - e. handle emergency situations, including vehicle evacuation procedures
 - f. operate any special equipment, such as wheelchair lifts, assistance devices or special occupant restraints
 - g. conduct routine maintenance and safety checks of the vehicle
 - h. maintain accurate records as necessary
 - i. drivers must also receive instruction on the topics listed in 45 CFR 1304.52(k)(1)

2. The provisions of the Head Start Program Performance Standards for Children with Disabilities (45 CFR 1308) relating to transportation services for children with disabilities.
 - a. Drivers must receive refresher training courses and any additional necessary training to meet the requirements applicable in the State where the agency operates.
 - b. Each agency providing transportation services must ensure that drivers qualify under the applicable driver training requirements in its State
 - i. The annual evaluation of each driver includes an on-board observation of road performance.
 - ii. Before bus monitors begin their duties, they are trained on child boarding and exiting procedures, use of child restraint systems, required paperwork, emergency response, emergency evacuation procedures, use of special equipment, child pick-up and release procedures and pre and post trip vehicle checks.

Each agency providing transportation services must ensure that in planning fixed routes the safety of the children being transported is the primary consideration. The agency must also ensure that the following basic principles of trip routing are adhered to:

1. The time a child is in transit to and from the Head Start program must not exceed one hour unless there is no shorter route available, or any alternative shorter route is either unsafe or impractical.
2. Vehicles must not be loaded beyond the maximum passenger capacity at any time.
3. Vehicles must not be required to back up or make “U” turns, except when necessary for reasons of safety or because of physical barriers.
4. Stops must be located to minimize traffic disruptions and to provide the driver a good field of view in front of and behind the vehicle.
5. When possible, stops must be located to eliminate the need for children to cross the street or highway to board or leave the vehicle.
6. If children must cross the street before boarding or after leaving the vehicle because curbside drop off or pick up is impossible, they must be escorted across the street by the bus monitor or another adult.
7. Specific procedures must be established for the use of alternate routes in the case of hazardous conditions that could affect the safety of the children who are being transported, such as ice or water build up, natural gas line breaks, or emergency road closing. In selecting among alternatives, transportation providers must choose routes that comply as much as possible with the requirements of this section.

Route Changes

Timing of Changes

1. Routes can be changed no more than once a month.
2. Route sheets are provided to drivers prior to their first run of the month.
3. Times are finalized and provided to the school by Wednesday at 5:00 p.m. the week before the changes occur so that bus times can be updated on bus tags.

4. Attendance sheets are provided weekly, prior to their first run of the week and drivers are to be notified no later than the Thursday prior of any changes on the route.
5. Any emergency cards must be provided to transportation prior to the student starting on the bus.
6. All changes must be requested through the school.
7. No changes are to occur directly through transportation and no last-minute changes are to be made.

Removal

1. Driver is to track attendance and provide it to the transportation supervisor.
2. Supervisor is to provide a list of student no-shows once a week to the site director, listing at minimum of those students that haven't ridden the entire week.
3. The school is responsible for informing transportation whether that student should be removed from the bus list.
4. If a student is to be removed from the route; that change must occur at the end of the month.

Pedestrian Safety

Each agency must provide training for staff, parents and children in pedestrian safety. The training provided to children must be developmentally and age appropriate and an integral part of their program experiences. The need for an adult to accompany a preschool child while crossing the street must be emphasized in the training provided to parents and children. The required transportation and pedestrian safety education of children and parents must be provided within the first thirty days of the program year.

Each agency providing transportation services, directly or through another organization or an individual, must ensure that children who receive such services are taught:

1. safe riding practices
2. safety procedures for boarding and leaving the vehicle
3. safety procedures in crossing the street to and from the vehicle at stops
4. recognition of the danger zones around the vehicle
5. emergency evacuation procedures, including participating in an emergency evacuation drill conducted on the vehicle the child will be riding

Each agency providing transportation services must provide training for parents that:

1. emphasize the importance of escorting their children to the vehicle stop and the importance of reinforcing the training provided to children regarding vehicle safety
2. complements the training provided to their children so that safety practices can be reinforced both in Head Start and at home by the parent.

Each agency providing transportation services must ensure that at least three bus evacuation drills are conducted during the program year. Documentation of these drills should be included in the Internal Monitoring section of the FA2 in ChildPlus for the month that they occurred.

Each agency providing transportation services must develop activities to remind children of the safety procedures. These activities must be developmentally and age-appropriate, individualized, and be an integral part of the Head Start program activities.

Each agency must specify any special transportation requirements for a child with a disability when preparing the child's Individual Education Plan (IEP) or Individual Family Service Plan (IFSP), and ensure that special transportation requirements in a child's IEP or IFSP are followed, including:

1. special pick-up and drop-off requirements
2. special seating requirements
3. special equipment needs
4. any special assistance that may be required
5. any special training for bus drivers and monitors

Internal monitoring of transportation services will be conducted quarterly by each delegate agency that provides transportation to enrolled children. Designated staff at each delegate agency will ride the bus once a quarter and complete the Bus Ride Along Checklist. The completed checklist will be uploaded to Child Plus under the FA2 in the month that the monitoring occurred. The Grantee Quality Assurance Specialist will conduct internal monitoring of transportation services twice per year in October and March. A Bus Ride Along Checklist will be completed by the Quality Assurance Specialist and uploaded to Child Plus under the FA2 in the month that the monitoring occurred. The Bus Ride Along Checklist is attached to this policy.

**WASHTENAW INTERMEDIATE SCHOOL DISTRICT
OPERATIONAL POLICIES AND PROCEDURES
FINANCIAL AND ADMINISTRATIVE SERVICES**

Performance Standard: 1303.70 (a)(b) 1303.71 (d)	GSRP Implementation Manual Section:	Licensing #:
Early Childhood Executive Director or Designee Approval Date:	Policy Council Approval Date:	Governing Board Operational Policy Approval Date:
Page(s): 2	Effective Date:	Date of Latest Revision/Review:

SUBJECT: Van Usage and Family Transportation - WISD Staff

OPERATIONAL POLICY:

WISD Early Childhood Department staff members may access the department van for use in transporting materials to and from family and community events, attending professional development (when multiple staff members attend together), transporting items needed for programming, and transporting families enrolled in Washtenaw ISD Early Childhood programs in order to attend program activities, to obtain needed resources, and, or, for children enrolled in Head Start or Early Head Start, transporting families without reliable transportation to annual physicals, immunization appointments, dental appointments that are required.

Under no circumstances should staff provide transportation to families in their own vehicle.

WISD staff members must submit both a copy of their valid driver's license and copy of their auto insurance prior to being approved to drive the van. It is the responsibility of each team member's supervisor to ensure that this documentation is provided to the WISD Human Resources supervisor.

OPERATIONAL PROCEDURE (procedure subject to change):

WISD staff members in the Early Childhood Department, following submission of required documentation and approval from their supervisor, will follow the following procedure to use the van.

General use:

1. WISD staff members will use the Van Request Form, located at the Early Childhood Department Office Professional's desk, to reserve the day/time. Staff may also contact the Early Childhood Department Office Professional to reserve the van for them. Requests will be fulfilled on a first-come, first-served basis.
2. On the day of the reservation, staff will pick up the keys from the Early Childhood Department Office Professional, and sign the request form.
3. When the van is returned, staff will complete the Van Request Form and note the mileage and gas level.
4. When the gas level is low, a Supervisor must be notified to ensure the van is fueled.

Transportation of children and families:

In order to reduce barriers to participation, WISD staff will offer families enrolled in Washtenaw ISD Early Childhood programs transportation to program related activities or requirements when other means of transportation are unavailable. The following events and activities are allowable:

- Home-based Early Head Start socializations
- Program planned events including:
 - Health Expos
 - Parent Committee Meetings
 - Policy Council
- Activities and appointments necessary to fulfill program requirements and support family well being including:
 - Obtaining resources in the community when a family need is identified, and supporting progress toward Family Partnership Goals. (i.e. DHS appointments, emergency food, etc.)
 - Accessing community agency services and items to support family needs and case management.
 - Traveling to medical and dental appointments required for program participation (following the Early and Periodic Screening, Diagnostic and Treatment (EPSDT) requirements)

All families being transported by WISD staff must comply with the requirements in this section. WISD staff will notify each family of these requirements and confirm that the family has access to the items below prior to scheduling transportation.

1. Parents must use their own child car seat(s) that are appropriate for the child's age, height and weight of each child being transported.
2. Parents must install the car seat in the van themselves, without WISD assistance. Only certified Car Seat Technicians may provide instruction on proper installation of car seats.
3. Following installation of the car seat(s), parents must confirm that they have installed their own car seat and are taking responsibility for their child's safety during transportation by signing the Parent and Family Transportation Verification form.

Coversheet

Updated WISD Policy – First Read

Section:	VI. New Business
Item:	C. Updated WISD Policy – First Read
Purpose:	
Submitted by:	
Related Material:	Board Memo - 1st Read - 08.12.25.pdf PO 1130 - Conflict of Interest.pdf PO 3110 - Conflict of Interest.pdf PO 4110 - Conflict of Interest.pdf PO 6110 - Grant Funds.pdf PO 6111 - Internal Controls.pdf PO 6112 - Cash Management of Grants.pdf PO 6114 - Cost Principles-Spending Federal Funds.pdf PO 6325 - Procurement-Federal Grants & Funds.pdf PO 6550 - Travel Payment & Reimbursement.pdf PO 7310 - Disposition of Surplus Property.pdf PO 7450 - Property Inventory.pdf



DATE: August 7, 2025

TO: Naomi Norman, Superintendent and
Members of the WISD Board of Education

FROM: Becky L. Mullins
Supervisor, Human Resources and Legal Services

RE: Updated Policies – First Read

The Policy Committee¹ recommends adoption to the following proposed policies as attached:

WISD Board Policies -

Policy #1130 - Conflict of Interest
Policy #3110 - Conflict of Interest
Policy #4110 - Conflict of Interest
Policy #6110 - Grant Funds
Policy #6111 - Internal Controls
Policy #6112 - Cash Management of Funds
Policy #6114 - Cost Principles-Spending Federal Funds
Policy #6325 - Procurement-Federal Grants & Funds
Policy #6550 - Travel Payment & Reimbursement
Policy #7310 - Disposition of Surplus Property
Policy #7450 - Property Inventory

These revisions should be adopted in order to maintain accurate policies that align with the current legislative changes.

Enclosure

¹ Steve Olsen (Board Trustee), Mary Jane Tramontin (Board Vice President), Naomi Norman (Superintendent), Brian Marcel (Associate Superintendent), Cherie Vannatter (Deputy Superintendent), Cassandra Harmon-Higgins (Executive Director of Human Resources and Legal Services), and Becky Mullins (Supervisor of Human Resources and Legal Services)

Book: Policies for ISD Update
 Section: Vol. 39, No. 1 - EDGAR UGG - September 2024 ISD
 Title: CONFLICT OF INTEREST
 Code: po1130
 Status: Active

1130 - CONFLICT OF INTEREST

Staff members, officers, and agents shall perform their official duties in a manner free from conflict of interest. To this end:

- A. The maintenance of unusually high standards of honesty, integrity, impartiality, and professional conduct by the ~~School~~ District's Board members, employees, officers, and agents is essential to ensure the proper performance of school business as well as to earn and keep public confidence in the ~~School~~ District.

To accomplish this, the Board of Education has adopted the following guidelines which apply to all District ~~employees, officers, and agents, and Board members~~ including members of the Board ~~Board members, employees, officers, and agents~~ to assure that conflicts of interest do not occur. These guidelines are not intended to be all-inclusive, nor to substitute for good judgment on the part of all ~~employees, officers, agents, and Board members~~ and agents ~~Board members, employees, officers, and agents~~.

1. No ~~employee, officer, or agent, or Board member~~ Board member, employee, officer, or agent shall engage in or have a financial or other interest, directly or indirectly, in any activity that conflicts or raises a reasonable question of conflict with ~~the employee's, officer's, agent's, or Board member's~~ his/her the Board member's, employee's, officer's, or agent's duties and responsibilities in the school system. When a staff member determines that the possibility of a personal interest conflict exists, ~~members/he the staff member's~~ should, prior to the matter being considered by the Board or administration, disclose ~~his/her the staff member's~~ interest (such disclosure shall become a matter of record in the minutes of the Board).
2. No ~~staff member, officer, or agent, or Board member~~ Board member, employee, officer, or agent shall use ~~his/her their~~ position to benefit either ~~himself/herself themselves~~ or any other individual or agency apart from the total interest of the ~~School~~ District.
3. If the financial interest pertains to a proposed contract with the District, the following requirements must be met.

~~The staff member, officer, or agent, or Board member~~ The District Board member, employee, officer, or agent shall disclose the direct financial interest in the contract to the Board, with such disclosure made a part of the official Board minutes. If ~~his/her the~~ direct financial interest amounts to \$250 or more or five percent (5%) or more of the contract cost to the District, ~~the staff member, officer, or agent, or Board member~~ the Board member, employee, officer, or agent shall make the disclosure in one (1) of two (2) ways:

- a. In writing, to the Board President at least seven (7) days prior to the meeting at which the vote on the contract will be taken. The disclosure shall be made public in the same manner as the Board's notices of its public meetings. (See Bylaw 0165)
- b. By announcement at a meeting at least seven (7) days prior to the meeting at which a vote on the contract is to be taken. The ~~staff member, officer, or agent, or Board member~~ Board member, employee, officer, or agent must use this method of disclosure if ~~his/her the~~ financial interest amounts to \$5,000 or more.
4. ~~Employees, officers, and agents, and Board members~~ Board members, employees, officers, and agents shall not engage in business, private practice of their profession, the rendering

of services, or the sale of goods of any type where advantage is taken of any professional relationship ~~the employee, officer, agent, or Board member~~ the Board member, employee, officer, or agent may have with any student, client, or parents of such students or clients in the course ~~of the employee's, officer's, agent's, or Board member's~~ of the Board member's, employee's, officer's, or agent's employment or professional relationship with the ~~School~~ District.

Included, by way of illustration rather than limitation, are the following:

- a. the provision of any private lessons or services for a fee;
 - b. the use, sale, or improper divulging of any privileged information about a student or client gained in the course of the ~~employee's, officer's, or agent's, or Board member's~~ Board member's, employee's, officer's, or agent's employment or professional relationship with the District through ~~his/her~~ access to ~~School~~ District records;
 - c. the referral of any student or client for lessons or services to any private business or professional practitioner if there is any expectation of reciprocal referrals, sharing of fees, or other remuneration for such referrals;
 - d. the requirement of students or clients to purchase any private goods or services provided by ~~an employee, officer, or agent, or Board member~~ a Board member, employee, officer, or agent or any business or professional practitioner with whom any ~~employee, officer, or agent, or Board member~~ Board member, employee, officer, or agent has a financial or other relationship, as a condition of receiving any grades, credits, promotions, approvals, or recommendations.
5. ~~Employees, officers, and agents, and Board members~~ Board members, employees, officers, and agents shall not make use of materials, equipment, or facilities of the ~~School~~ District in private practice. Examples would be the use of facilities before, during, or after regular business hours for service to private practice clients, or the checking out of items from an instructional materials center for private practice.
- B. Should exceptions to this policy be necessary in order to provide services to students or clients of the ~~School~~ District, all such exceptions will be made known to the employee's supervisor and will be disclosed to the Superintendent ~~before~~ entering into any private relationship.
- C. ~~Employees, officers, and agents can not participate in the selection, award, or administration of a contract supported by a Federal grant/award if s/he has a real or apparent conflict of interest. Such a conflict of interest would arise when the employee, officer, or agent, any member of his/her immediate family, his/her partner, or an organization which employs or is about to employ any of the parties described in this section, has a financial or other interest in or a tangible personal benefit from a firm considered for a contract.~~ No Board member, employee, officer, or agent with a real or apparent conflict of interest may participate in the selection, award, or administration of a contract supported by the Federal award. A conflict of interest includes when the employee, officer, agent, or Board member, any member of their immediate family, their partner, or an organization that employs or is about to employ any of the parties indicated herein, has a financial or other interest in or a tangible personal benefit from and entity considered for a contract.

~~[SELECT OPTION #1 OR OPTION #2]~~

~~[] [OPTION #1]~~

~~An employee, officer, agent, and Board member of the District may neither solicit nor accept gratuities, favors, or anything of monetary value from contractors[] Employees, officers, and agents can not solicit or accept gratuities, favors, or anything of monetary value from contractors or parties to subcontracts.~~

~~[OR]OR~~

~~[OPTION #2]~~

~~Pursuant to Federal rules, the District has set standards for situations where the financial interest is not substantial or the gift is an unsolicited item of nominal value. For purposes of this section, "nominal value" means that the gift has a monetary value of \$ _____ or less.] Employees, officers, and agents shall not solicit or accept gratuities, favors, or anything of monetary value from contractors or parties to subcontracts involved with Federal grant funds. Employees, officers, and agents may, however, accept a gift of unsolicited items of "nominal value" from a contractor or party to subcontracts that do not involve Federal grant funds. For purposes of this section, "nominal value" means that the gift has a monetary value of \$ _____ or less.~~

~~[END OF OPTIONS]~~

~~[In accordance with M.C.L. 380.634, the Michigan Department of Education (MDE) adjusts the limits on the value of gifts that may be accepted from vendors or potential vendors for Intermediate School District employees. The fiscal year 2023-20242021-22 cap for gifts was \$7364.]~~ Pursuant to Federal rules, the District has set standards for situations where the financial interest is not substantial or the gift is an unsolicited item of nominal value. For purposes of this section, "nominal value" means that the gift has a monetary value as established in accordance with M.C.L. 380.634, the Michigan Department of Education (MDE). (The nominal value for 2024-25 is \$76 or less).

- D. ~~If to the extent~~ that the District has a parent, affiliate, or subsidiary organization that is not a State, local government, or Indian tribe, the ~~School~~-District may not conduct a procurement action involving the parent, affiliate, or subsidiary organization if the ~~School~~-District is unable, or appears to be unable, to be impartial in conducting a procurement action involving a related organization.
- E. ~~Employees, officers, and agents, and Board members~~ Board members, employees, officers, and agents must promptly disclose any potential conflict of interest which may lead to a violation of this policy to the ~~School~~-District. Upon discovery of any potential conflict of interest, the ~~School~~-District will disclose, in writing, the potential conflict of interest to the appropriate Federal ~~awarding~~-agency or, if applicable, the pass-through entity.

The District will also ~~disclose, in a timely manner, all violations of Federal criminal law involving fraud, bribery, or gratuity that affect a Federal award to the appropriate Federal awarding agency or, if applicable, the pass-through entity~~ promptly disclose whenever, in connection with the Federal award (including any activities or subawards thereunder), it has credible evidence of the commission of a violation of Federal criminal law involving fraud, conflict of interest, bribery, or gratuity violations found in Title 18 of the United States Code or a violation of the civil False Claims Act (31 U.S.C. 3729-3733). The disclosure must be made in writing to the Federal agency, the agency's Office of Inspector General, and pass-through entity. The District is also required to report matters related to recipient integrity and performance in accordance with Appendix XII of 2 C.F.R. Part 200.

- F. ~~Employees, officers, and agents, and Board members~~ Board members, employees, officers, and agents found to be in violation of this conflict of interest policy will be subject to disciplinary action, up to and including termination, as permitted by applicable Board policy.

~~[DRAFTING NOTE: The School District has discretion over the appropriate disciplinary actions. For example, the School District may suspend or terminate the individual's employment, transfer the individual, end the District's professional relationship with that individual, or temporarily re-assign the individual. All disciplinary actions must be in accordance with applicable Federal, State, and local law, as well as any collectively bargained agreements.]~~

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Legal References

2 C.F.R. 200.112, 200.113, 200.318

M.C.L. 380.634, 380.1805(1)

Book: Policies for ISD Update
 Section: Vol. 39, No. 1 - EDGAR UGG - September 2024 ISD
 Title: CONFLICT OF INTEREST
 Code: po3110
 Status: Active

3110 - CONFLICT OF INTEREST

Staff members, officers, and agents shall perform their official duties in a manner free from conflict of interest. To this end:

- A. The maintenance of unusually high standards of honesty, integrity, impartiality, and professional conduct by the ~~School~~ District's Board members, employees, officers, and agents is essential to ensure the proper performance of school business as well as to earn and keep public confidence in the ~~School~~ District.

To accomplish this, the Board of Education has adopted the following guidelines which apply to all District ~~employees, officers, and agents, and Board members~~ including members of the Board ~~Board members, employees, officers, and agents~~ to assure that conflicts of interest do not occur. These guidelines are not intended to be all-inclusive, nor to substitute for good judgment on the part of all ~~employees, officers, agents, and Board members~~ and agents ~~Board members, employees, officers, and agents~~.

1. No ~~employee, officer, or agent, or Board member~~ Board member, employee, officer, or agent shall engage in or have a financial or other interest, directly or indirectly, in any activity that conflicts or raises a reasonable question of conflict with ~~the employee's, officer's, agent's, or Board member's~~ his/her the Board member's, employee's, officer's, or agent's duties and responsibilities in the school system. When a staff member determines that the possibility of a personal interest conflict exists, ~~members/he the staff member's~~ should, prior to the matter being considered by the Board or administration, disclose ~~his/her the staff member's~~ interest (such disclosure shall become a matter of record in the minutes of the Board).
2. No ~~staff member, officer, or agent, or Board member~~ Board member, employee, officer, or agent shall use ~~his/her their~~ position to benefit either ~~himself/herself themselves~~ or any other individual or agency apart from the total interest of the ~~School~~ District.
3. If the financial interest pertains to a proposed contract with the District, the following requirements must be met.

~~The staff member, officer, or agent, or Board member~~ The District Board member, employee, officer, or agent shall disclose the direct financial interest in the contract to the Board, with such disclosure made a part of the official Board minutes. If ~~his/her the~~ direct financial interest amounts to \$250 or more or five percent (5%) or more of the contract cost to the District, ~~the staff member, officer, or agent, or Board member~~ the Board member, employee, officer, or agent shall make the disclosure in one (1) of two (2) ways:

- a. In writing, to the Board President at least seven (7) days prior to the meeting at which the vote on the contract will be taken. The disclosure shall be made public in the same manner as the Board's notices of its public meetings. (See Bylaw 0165)
- b. By announcement at a meeting at least seven (7) days prior to the meeting at which a vote on the contract is to be taken. The ~~staff member, officer, or agent, or Board member~~ Board member, employee, officer, or agent must use this method of disclosure if ~~his/her the~~ financial interest amounts to \$5,000 or more.
4. ~~Employees, officers, and agents, and Board members~~ Board members, employees, officers, and agents shall not engage in business, private practice of their profession, the rendering

of services, or the sale of goods of any type where advantage is taken of any professional relationship ~~the employee, officer, agent, or Board member~~ the Board member, employee, officer, or agent may have with any student, client, or parents of such students or clients in the course ~~of the employee's, officer's, agent's, or Board member's~~ of the Board member's, employee's, officer's, or agent's employment or professional relationship with the ~~School~~ District.

Included, by way of illustration rather than limitation, are the following:

- a. the provision of any private lessons or services for a fee;
 - b. the use, sale, or improper divulging of any privileged information about a student or client gained in the course of the ~~employee's, officer's, or agent's, or Board member's~~ Board member's, employee's, officer's, or agent's employment or professional relationship with the District through ~~his/her~~ access to ~~School~~ District records;
 - c. the referral of any student or client for lessons or services to any private business or professional practitioner if there is any expectation of reciprocal referrals, sharing of fees, or other remuneration for such referrals;
 - d. the requirement of students or clients to purchase any private goods or services provided by ~~an employee, officer, or agent, or Board member~~ a Board member, employee, officer, or agent or any business or professional practitioner with whom any ~~employee, officer, or agent, or Board member~~ Board member, employee, officer, or agent has a financial or other relationship, as a condition of receiving any grades, credits, promotions, approvals, or recommendations.
5. ~~Employees, officers, and agents, and Board members~~ Board members, employees, officers, and agents shall not make use of materials, equipment, or facilities of the ~~School~~ District in private practice. Examples would be the use of facilities before, during, or after regular business hours for service to private practice clients, or the checking out of items from an instructional materials center for private practice.
- B. Should exceptions to this policy be necessary in order to provide services to students or clients of the ~~School~~ District, all such exceptions will be made known to the employee's supervisor and will be disclosed to the Superintendent ~~before~~ entering into any private relationship.
- C. ~~Employees, officers, and agents can not participate in the selection, award, or administration of a contract supported by a Federal grant/award if s/he has a real or apparent conflict of interest. Such a conflict of interest would arise when the employee, officer, or agent, any member of his/her immediate family, his/her partner, or an organization which employs or is about to employ any of the parties described in this section, has a financial or other interest in or a tangible personal benefit from a firm considered for a contract.~~ No Board member, employee, officer, or agent with a real or apparent conflict of interest may participate in the selection, award, or administration of a contract supported by the Federal award. A conflict of interest includes when the employee, officer, agent, or Board member, any member of their immediate family, their partner, or an organization that employs or is about to employ any of the parties indicated herein, has a financial or other interest in or a tangible personal benefit from and entity considered for a contract.

~~[SELECT OPTION #1 OR OPTION #2]~~

~~[] [OPTION #1]~~

~~An employee, officer, agent, and Board member of the District may neither solicit nor accept gratuities, favors, or anything of monetary value from contractors[] Employees, officers, and agents can not solicit or accept gratuities, favors, or anything of monetary value from contractors or parties to subcontracts.~~

~~[OR]OR~~

~~[OPTION #2]~~

~~Pursuant to Federal rules, the District has set standards for situations where the financial interest is not substantial or the gift is an unsolicited item of nominal value. For purposes of this section, "nominal value" means that the gift has a monetary value of \$ _____ or less.] Employees, officers, and agents shall not solicit or accept gratuities, favors, or anything of monetary value from contractors or parties to subcontracts involved with Federal grant funds. Employees, officers, and agents may, however, accept a gift of unsolicited items of "nominal value" from a contractor or party to subcontracts that do not involve Federal grant funds. For purposes of this section, "nominal value" means that the gift has a monetary value of \$ _____ or less.~~

~~[END OF OPTIONS]~~

~~[In accordance with M.C.L. 380.634, the Michigan Department of Education (MDE) adjusts the limits on the value of gifts that may be accepted from vendors or potential vendors for Intermediate School District employees. The fiscal year 2023-20242021-22 cap for gifts was \$7364.]~~ Pursuant to Federal rules, the District has set standards for situations where the financial interest is not substantial or the gift is an unsolicited item of nominal value. For purposes of this section, "nominal value" means that the gift has a monetary value as established in accordance with M.C.L. 380.634, the Michigan Department of Education (MDE). (The nominal value for 2024-25 is \$76 or less).

- D. ~~If to the extent~~ that the District has a parent, affiliate, or subsidiary organization that is not a State, local government, or Indian tribe, the ~~School~~-District may not conduct a procurement action involving the parent, affiliate, or subsidiary organization if the ~~School~~-District is unable, or appears to be unable, to be impartial in conducting a procurement action involving a related organization.
- E. ~~Employees, officers, and agents, and Board members~~ Board members, employees, officers, and agents must promptly disclose any potential conflict of interest which may lead to a violation of this policy to the ~~School~~-District. Upon discovery of any potential conflict of interest, the ~~School~~-District will disclose, in writing, the potential conflict of interest to the appropriate Federal ~~awarding~~-agency or, if applicable, the pass-through entity.

The District will also ~~disclose, in a timely manner, all violations of Federal criminal law involving fraud, bribery, or gratuity that affect a Federal award to the appropriate Federal awarding agency or, if applicable, the pass-through entity~~ promptly disclose whenever, in connection with the Federal award (including any activities or subawards thereunder), it has credible evidence of the commission of a violation of Federal criminal law involving fraud, conflict of interest, bribery, or gratuity violations found in Title 18 of the United States Code or a violation of the civil False Claims Act (31 U.S.C. 3729-3733). The disclosure must be made in writing to the Federal agency, the agency's Office of Inspector General, and pass-through entity. The District is also required to report matters related to recipient integrity and performance in accordance with Appendix XII of 2 C.F.R. Part 200.

- F. ~~Employees, officers, and agents, and Board members~~ Board members, employees, officers, and agents found to be in violation of this conflict of interest policy will be subject to disciplinary action, up to and including termination, as permitted by applicable Board policy.

~~[DRAFTING NOTE: The School District has discretion over the appropriate disciplinary actions. For example, the School District may suspend or terminate the individual's employment, transfer the individual, end the District's professional relationship with that individual, or temporarily re-assign the individual. All disciplinary actions must be in accordance with applicable Federal, State, and local law, as well as any collectively bargained agreements.]~~

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Legal References

2 C.F.R. 200.112, 200.113, 200.318

M.C.L. 380.634, 380.1805(1)

Book: Policies for ISD Update
 Section: Vol. 39, No. 1 - EDGAR UGG - September 2024 ISD
 Title: CONFLICT OF INTEREST
 Code: po4110
 Status: Active

4110 - CONFLICT OF INTEREST

Staff members, officers, and agents shall perform their official duties in a manner free from conflict of interest. To this end:

- A. The maintenance of unusually high standards of honesty, integrity, impartiality, and professional conduct by the ~~School~~ District's Board members, employees, officers, and agents is essential to ensure the proper performance of school business as well as to earn and keep public confidence in the ~~School~~ District.

To accomplish this, the Board of Education has adopted the following guidelines which apply to all District ~~employees, officers, and agents, and Board members~~ including members of the Board ~~Board members, employees, officers, and agents~~ to assure that conflicts of interest do not occur. These guidelines are not intended to be all-inclusive, nor to substitute for good judgment on the part of all ~~employees, officers, agents, and Board members~~ and agents ~~Board members, employees, officers, and agents~~.

1. No ~~employee, officer, or agent, or Board member~~ Board member, employee, officer, or agent shall engage in or have a financial or other interest, directly or indirectly, in any activity that conflicts or raises a reasonable question of conflict with ~~the employee's, officer's, agent's, or Board member's~~ his/her the Board member's, employee's, officer's, or agent's duties and responsibilities in the school system. When a staff member determines that the possibility of a personal interest conflict exists, ~~members/he the staff member's~~ should, prior to the matter being considered by the Board or administration, disclose ~~his/her the staff member's~~ interest (such disclosure shall become a matter of record in the minutes of the Board).
2. No ~~staff member, officer, or agent, or Board member~~ Board member, employee, officer, or agent shall use ~~his/her their~~ position to benefit either ~~himself/herself themselves~~ or any other individual or agency apart from the total interest of the ~~School~~ District.
3. If the financial interest pertains to a proposed contract with the District, the following requirements must be met.

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- a. In writing, to the Board President at least seven (7) days prior to the meeting at which the vote on the contract will be taken. The disclosure shall be made public in the same manner as the Board's notices of its public meetings. (See Bylaw 0165)
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Included, by way of illustration rather than limitation, are the following:

- a. the provision of any private lessons or services for a fee;
 - b. the use, sale, or improper divulging of any privileged information about a student or client gained in the course of the ~~employee's, officer's, or agent's, or Board member's~~ Board member's, employee's, officer's, or agent's employment or professional relationship with the District through ~~his/her~~ access to ~~School~~ District records;
 - c. the referral of any student or client for lessons or services to any private business or professional practitioner if there is any expectation of reciprocal referrals, sharing of fees, or other remuneration for such referrals;
 - d. the requirement of students or clients to purchase any private goods or services provided by ~~an employee, officer, or agent, or Board member~~ a Board member, employee, officer, or agent or any business or professional practitioner with whom any ~~employee, officer, or agent, or Board member~~ Board member, employee, officer, or agent has a financial or other relationship, as a condition of receiving any grades, credits, promotions, approvals, or recommendations.
5. ~~Employees, officers, and agents, and Board members~~ Board members, employees, officers, and agents shall not make use of materials, equipment, or facilities of the ~~School~~ District in private practice. Examples would be the use of facilities before, during, or after regular business hours for service to private practice clients, or the checking out of items from an instructional materials center for private practice.
- B. Should exceptions to this policy be necessary in order to provide services to students or clients of the ~~School~~ District, all such exceptions will be made known to the employee's supervisor and will be disclosed to the Superintendent ~~before~~ entering into any private relationship.
- C. ~~Employees, officers, and agents can not participate in the selection, award, or administration of a contract supported by a Federal grant/award if s/he has a real or apparent conflict of interest. Such a conflict of interest would arise when the employee, officer, or agent, any member of his/her immediate family, his/her partner, or an organization which employs or is about to employ any of the parties described in this section, has a financial or other interest in or a tangible personal benefit from a firm considered for a contract.~~ No Board member, employee, officer, or agent with a real or apparent conflict of interest may participate in the selection, award, or administration of a contract supported by the Federal award. A conflict of interest includes when the employee, officer, agent, or Board member, any member of their immediate family, their partner, or an organization that employs or is about to employ any of the parties indicated herein, has a financial or other interest in or a tangible personal benefit from and entity considered for a contract.

~~[SELECT OPTION #1 OR OPTION #2]~~

~~[] [OPTION #1]~~

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~~Pursuant to Federal rules, the District has set standards for situations where the financial interest is not substantial or the gift is an unsolicited item of nominal value. For purposes of this section, "nominal value" means that the gift has a monetary value of \$ _____ or less.] Employees, officers, and agents shall not solicit or accept gratuities, favors, or anything of monetary value from contractors or parties to subcontracts involved with Federal grant funds. Employees, officers, and agents may, however, accept a gift of unsolicited items of "nominal value" from a contractor or party to subcontracts that do not involve Federal grant funds. For purposes of this section, "nominal value" means that the gift has a monetary value of \$ _____ or less.~~

~~[END OF OPTIONS]~~

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- D. ~~If to the extent~~ that the District has a parent, affiliate, or subsidiary organization that is not a State, local government, or Indian tribe, the ~~School~~-District may not conduct a procurement action involving the parent, affiliate, or subsidiary organization if the ~~School~~-District is unable, or appears to be unable, to be impartial in conducting a procurement action involving a related organization.
- E. ~~Employees, officers, and agents, and Board members~~ Board members, employees, officers, and agents must promptly disclose any potential conflict of interest which may lead to a violation of this policy to the ~~School~~-District. Upon discovery of any potential conflict of interest, the ~~School~~-District will disclose, in writing, the potential conflict of interest to the appropriate Federal ~~awarding~~-agency or, if applicable, the pass-through entity.

The District will also ~~disclose, in a timely manner, all violations of Federal criminal law involving fraud, bribery, or gratuity that affect a Federal award to the appropriate Federal awarding agency or, if applicable, the pass-through entity~~ promptly disclose whenever, in connection with the Federal award (including any activities or subawards thereunder), it has credible evidence of the commission of a violation of Federal criminal law involving fraud, conflict of interest, bribery, or gratuity violations found in Title 18 of the United States Code or a violation of the civil False Claims Act (31 U.S.C. 3729-3733). The disclosure must be made in writing to the Federal agency, the agency's Office of Inspector General, and pass-through entity. The District is also required to report matters related to recipient integrity and performance in accordance with Appendix XII of 2 C.F.R. Part 200.

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Legal References

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M.C.L. 380.634, 380.1805(1)

Book: Policies for ISD Update

Section: Vol. 39, No. 1 - EDGAR UGG - September 2024 ISD

Title: Vol. 39, No. 1 - EDGAR UGG - September 2024 Revised GRANT FUNDS

Code: po6110

Status: Active

Revised Policy - Vol. 39, No. 1 - EDGAR/UGG Revisions

6110 - GRANT FUNDS

It is the objective of the Board of Education to provide equal educational opportunities for all students within the District. Government agencies, as well as foundations, businesses, and individuals, periodically offer both human and material resources to the District that would benefit students and the educational program. Therefore, it is the intent of the Board to consider grant proposals and applications for their potential to enhance educational opportunities, the educational environment, and the physical and mental growth for each student.

The Superintendent shall review new Federal education legislation and prepare proposals for programs the Superintendent ~~s/he~~ deems would be of aid to the students of this District. The Superintendent shall approve each such proposal prior to its submission, and the Board shall approve all grants resulting from such proposals.

The Board regards available Federal funds of aid to local school districts and communities as a public trust. ~~It~~ The Board forbids the use of Federal monies for partisan political activities and for any use that would not be in accordance with Federal regulations and guidelines.

No Federal funds received by the District shall be used (1) to develop or distribute materials, or operate programs or courses of instruction directed at youth, that are designed to promote or encourage sexual activity, whether homosexual or heterosexual; (2) to distribute or to aid in the distribution by any organization of legally obscene materials to minors on school grounds; (3) to provide sex education or HIV-prevention education in schools unless that instruction is age appropriate and includes the health benefits of abstinence; or (4) to operate a program of contraceptive distribution in schools.

Grant Proposal Development

- A. All grant proposals must support at least one (1) District goal or priority.
- B. For projects where grant funds will not cover the entire cost of project implementation, additional fund sources must be identified, documented, and approved during the internal review process.

Grant Proposal Internal Review

- A. Each grant proposal shall be reviewed and approved by the Superintendent prior to submission to the funding source.
- B. ☒ The Superintendent shall present the following proposals to the Board for approval:
 - 1. ~~(-) Government-funded proposals, regardless of the amount;~~
 - 2. ☐ Proposals with budgets exceeding \$50,000.00; or first-time formula-type grants with budgets exceeding \$100,000.00
 - 3. ~~(-) Multi-school or District-wide proposals.~~

Mandatory Disclosures

- The District must promptly disclose whenever they have credible evidence of a violation of Federal criminal law potentially affecting the Federal award including, but not limited to, any fraud, embezzlement, bribery, gratuity violations, identity theft, or sexual assault and exploitation, or a violation of the civil False Claims Act (2 C.F.R. 175.105) regarding the obligation to report credible information related to conduct prohibited by the Trafficking Victims Protection Act, 22 U.S.C. 7104c.

- The disclosure must be made in writing to the Federal agency, the agency's Office of Inspector General, and the pass-through entity.

-

Whistleblower Protections

- An employee of the District may not be discharged, demoted, or otherwise discriminated against as a reprisal for disclosing information to the appropriate agency or individual that the employee reasonably believes is evidence of gross mismanagement of a Federal contract or grant, a gross waste of Federal funds, an abuse of authority relating to a Federal contract or grant, a substantial and specific danger to public health or safety, or a violation of law, rule, or regulation related to a Federal contract or grant. See Policy 1411/3211/4211 - Whistleblower Protection and Policy 8900 - Anti-Fraud.

Grant Administration

- A. The administration of grants will adhere to all applicable Federal, State, local, and grantor rules and regulations, including the terms and conditions of the Federal awards, as well as District policies and administrative guidelines.
- B. The Superintendent is responsible for the efficient and effective administration of grant awards through the application of sound management practices.
- C. The Superintendent is responsible for administering grant funds in a manner consistent with underlying agreements, applicable statutes, regulations, and objectives, and the terms and conditions of the grant award.
- D. The District, in recognition of its unique combination of staff, facilities, and experience, shall employ internal controls, including the organizational and management strategies necessary to assure proper and efficient administration of grant awards.
- E. All Federal funds received by the District will be used in accordance with the applicable Federal law and regulations and the terms and conditions of the Federal award. The Superintendent shall require that each draw of Federal monies be aligned with the District's payment process (whether reimbursement, cash advance, or a combination). If funds are permitted to be drawn in advance, all draws will be as close as administratively feasible to the related program expenditures and that, when restricted, such monies are used to supplement programs and funding and not to supplant or replace existing programming or current funding.

Maintenance of Effort (MOE) and Maintenance of Equity (MOEquity) requirements of the Federal program will be met in accordance with the requirements of the specific funded program. The District shall maintain appropriate documentation and records to substantiate compliance or to justify allowable exceptions, exemptions, or waivers.

- F. ☒ The Superintendent is authorized to sign related documents for grant administration, including documents required for submittal of grant proposals.

~~() Written amendments requiring the Superintendent's signature shall be presented to the Board for approval.~~

- G. ☒ Employee positions established through the use of grant funding shall terminate if and when the related grant funding ceases.

~~H. () Program reports including, but not limited to, audits, audit, site visits, and final reports shall be submitted to the Superintendent for review and distribution to the Board and other appropriate parties.~~

Financial Management

The financial management of grant funds shall be in compliance with all applicable Federal, State, local, and grantor rules, regulations, and assurances as well as District policies and administrative guidelines.

The District shall provide for the following:

- A. ~~Identification, in District accounts, of all grant awards received and expended and the programs under which they were received. For Federal programs and awards, identification shall include the Catalog of Federal Domestic Assistance (CFDA) title and number, Federal award identification number and year, name of the Federal agency, and name of the pass-through entity, as applicable.~~ of all Federal awards received and expended and the Federal programs under which they were received. Federal program and Federal award identification must include, as applicable, the Assistance Listings title and number, Federal award identification number, year the Federal award was issued, and name of the Federal agency or pass-through entity.
- B. Accurate, current, and complete disclosure of the financial results of each Federal award or program in accordance with the reporting requirements of the grant.
- C. Effective control over and accountability for all funds, property, and assets. The District must safeguard all assets and ensure they are used solely for authorized purposes. ~~Records that adequately identify the source and application of funds provided for Federally-funded activities. These records must contain information pertaining to Federal awards, authorizations, obligations, unobligated balances, assets, expenditures, income, and interest and be supported by source documentation.~~
- ~~D. Effective control over, and accountability for, all funds, property, and other assets. The District must adequately safeguard all assets and assure that they are used solely for authorized purposes.~~

~~D.—~~

Further, the District must:

1. establish and maintain effective internal control over the Federal award that provides reasonable assurance that the District is managing the Federal award in compliance with the U.S. Constitution, Federal statutes, regulations, and the terms and conditions of the Federal award;
 2. comply with the U.S. Constitution, Federal statutes, regulations, and the terms and conditions of the Federal award;
 3. evaluate and monitor the District's compliance with statutes, regulations, and the terms and conditions of the Federal award; and
 4. take prompt action when instances of noncompliance are identified. ~~including noncompliance identified in audit findings;~~
 5. ~~take reasonable measures to safeguard protected personally identifiable information and other information the Federal awarding agency or pass-through entity designates as sensitive consistent with applicable Federal, State, local, and tribal laws regarding privacy and obligations of confidentiality.~~
- E. ~~Comparison of expenditures with budget amounts for each Federal award.~~ Take reasonable cybersecurity and other measures to safeguard information including protected personally identifiable information (PII) and other types of information. This also includes information the Federal awarding agency or pass-through entity designates as sensitive or other information the

District considers sensitive and is consistent with applicable Federal, State, local, and tribal laws regarding privacy and obligations of confidentiality.

- F. Actual expenditures or outlays must be compared with budgeted amounts for each Federal award.
- G. Recordkeeping and written procedures to the extent required by Federal, State, local, and grantor rules and regulations pertaining to the grant award and accountability including, but not limited to, the following areas:
 - 1. cash management in accordance with 2 C.F.R. 200.305
 - 2. allowability of costs in accordance with subpart E and the terms and conditions of the Federal award
 - 3. conflict of interest
 - 4. procurement
 - 5. equipment management
 - 6. conducting technical evaluations of proposals and selecting recipients
 - 7. compensation and fringe benefits
 - 8. travel
- H. Disclosure of any potential conflict of interest and all mandatory violation disclosures potentially affecting the Federal award/grant to the Federal awarding agency or pass-through agency in accordance with applicable Federal policy.
- I. Insurance coverage for real property and equipment, if applicable, equivalent to such property owned by the District.

Audit Requirements

A single or program-specific audit (2 C.F.R. 200.514, 2 C.F.R. 200.507) is required for any year if the District expends \$1,000,000 or more in Federal awards during the District's fiscal year. When Federal awards expended are less than \$1,000,000, the District may be exempt from Federal audit requirements (2 C.F.R. 200.501) for that year. However, in all instances, the District's records must be available for review or audit by appropriate officials of the Federal agency, pass-through entity, and the Government Accountability Office (GAO).

The District shall:

- A. arrange for the audit required in accordance with 2 C.F.R. 200.509 and make sure that the audit is properly performed and submitted in accordance with 2 C.F.R. 200.512;
- B. prepare financial statements including the schedule of expenditures of Federal awards in accordance with 2 C.F.R. 200.510;
- C. promptly follow up and take corrective action on audit findings, including preparing a summary schedule of prior audit findings and a corrective action plan (2 C.F.R. 200.511); and
- D. provide the auditor access to personnel, accounts, books, records, supporting documentation, and any other information needed for the auditor to perform the audit.

Certifications and Records Retention

Financial reports must include a certification, signed by an official who is authorized to legally bind the District. The certification should state:

"I certify to the best of my knowledge and belief that the information provided herein is true, complete, and accurate. I am aware that the provision of false, fictitious, or fraudulent information, or the omission of any material fact, may subject me to criminal, civil, or administrative consequences including, but not limited to, violations of U.S. Code Title 18, Sections 2, 1001, 1343 and Title 31, Sections 3729-3730 and 3801-3812"

Each certification must be maintained pursuant to the requirements of 2 C.F.R. 200.334. The District shall retain all Federal award records for three (3) years from the date of submission of the final financial report.

Program Income

Program income means gross income earned by a grant recipient that is directly generated by a supported activity or earned as a result of the Federal award during the grant's period of performance.

It includes, but is not limited to, income from fees for services performed, the use or rental of real or personal property acquired under Federal awards, the sale of commodities or items fabricated under a Federal award, license fees and royalties on patents and copyrights, and principal and interest on loans made with Federal award funds. Interest earned on advances of Federal funds is not program income. Except as otherwise provided in Federal statutes, regulations, or the terms and conditions of the Federal award, program income does not include rebates, credits, discounts, and interest earned on any of them. Additionally, taxes, special assessments, levies, fines, and ~~other such~~ similar revenues raised by a recipient are not program income ~~unless the revenues are specifically identified in the Federal award or Federal awarding agency regulations as program income. Finally, proceeds~~ Proceeds from the sale of real property, equipment, or supplies are not program income. Finally, license fees and royalties for copyrighted material, patents, patent applications, trademarks, and inventions made under the Federal award subject to 37 C.F.R. Part 401 are not program income.

Unless it has received prior approval to use a different method or the terms and conditions of the grant authorize a different method, the District uses the deduction method of accounting for program income. Under the deduction method, program income is deducted from total allowable costs to determine the net allowable costs. Program income will only be used for current costs unless the District is otherwise directed by the Federal ~~awarding~~ agency or pass-through entity.

2 C.F.R. 200.56, 200.71, 200.77, 200.80, 200.112, 200.302, 200.307

2 C.F.R. 200.309, 200.310, 200.313, 200.318-.320, 200.343(b)&(e)

2 C.F.R. 200.501-511

20 U.S.C. 7906

34 C.F.R. 75.707, 76.563, 76.565, 76.707

Compliance Supplement for Single Audits of State and Local Governments

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Legal References

2 C.F.R. 200.56, 200.71, 200.77, 200.80, 200.112, 200.302, 200.307

2 C.F.R. 200.309, 200.310, 200.313, 200.318-.320, 200.343(b)&(e)

2 C.F.R. 200.501-511

20 U.S.C. 7906

34 C.F.R. 75.707, 76.563, 76.565, 76.707

Compliance Supplement for Single Audits of State and Local Governments

Classification Topic Revised

Book: Policies for ISD Update
Section: Vol. 39, No. 1 - EDGAR UGG - September 2024 ISD
Title: INTERNAL CONTROLS
Code: po6111
Status: Active

Revised Policy - Vol. 39, No. 1 - EDGAR/UGG Revisions

6111 - INTERNAL CONTROLS

The Superintendent shall establish, document, and maintain effective internal control over financial grants and awards that provide reasonable assurance that the program and funds are managed in compliance with the ~~applicable~~ U.S. Constitution, statutes, regulations, and the terms and conditions of the awards. The District will have a process that provides reasonable assurance regarding the achievement of the following objectives:

- A. effectiveness and efficiency of operations;
- B. reliability of reporting for internal and external use; and
- C. compliance with applicable laws and regulations.

These internal controls should comply with the guidance in "Standards for Internal Control in the Federal Government" issued by the Comptroller General of the United States or the "Internal Control-Integrated Framework" issued by the Committee of Sponsoring Organizations of the Treadway Commission (COSO).

The internal controls must provide reasonable assurance that transactions are properly recorded and accounted for in order to permit the preparation of reliable financial statements and Federal reports; maintain accountability over assets; and demonstrate compliance with Federal statutes, regulations, and the terms and conditions of the Federal award. The internal controls must also provide reasonable assurance that these transactions are executed in compliance with Federal statutes, regulations, and the terms and conditions of the Federal award that could have a direct and material effect on a Federal award, as well as any other Federal statutes and regulations that are identified in the Compliance Supplement. Finally, the District's internal controls must provide reasonable assurance that all Federal funds, property, and other assets are safeguarded against loss from unauthorized use or disposition.

The District shall:

- A. comply with the U.S. Constitution, Federal statutes, regulations, and the terms and conditions of the Federal ~~awards~~ award;
- B. evaluate and monitor its compliance with statutes, regulations, and the terms and conditions of the award;
- C. take prompt action when instances of noncompliance are identified ~~including noncompliance identified in audit findings~~; and
- D. take reasonable cybersecurity and other measures to safeguard protected ~~"personally identifiable information" ("PII") and other information the awarding agency or pass-through entity designates as sensitive or the District considers sensitive consistent with applicable Federal, state, local, and tribal laws and District policies regarding privacy and obligations of confidentiality~~ information including protected "personally identifiable information" (PII) and other types of information. This also includes information the Federal agency or pass-through entity designates as sensitive or other information the District considers sensitive and is consistent with applicable Federal, State, local, and tribal laws regarding privacy and responsibility over confidentiality.

PII is defined at 2 C.F.R. ~~200.79~~ 200.1 as "information that can be used to distinguish or trace an individual's identity, either alone or when combined with other personal or identifying information

that is linked or linkable to a specific individual."

However, the definition of PII is not ~~anchored~~attached to any single category of information or technology. Rather, it requires a case-by-case assessment of the specific risk that an individual can be identified.

Suggested resources:

- A. "Standards for Internal Control in the Federal Government" issued by the Comptroller General of the United States;
- B. "Internal Control Integrated Framework" (commonly referred to as the Green Book) issued by the Committee of Sponsoring Organizations of the Treadway Commission;
- C. "Compliance Supplement" issued by the U.S. Office of Management and Budget; and
- D. Internal control guidance issued by the U.S. Department of Education.

2 C.F.R. 200.1
2 C.F.R. 200.~~61~~.62
~~2 C.F.R. 200.79~~
2 C.F.R. 200.303

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Legal References

2 C.F.R. 200.1
2 C.F.R. 200.62
2 C.F.R. 200.303

Classification	Topic	Revised
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Book: Policies for ISD Update
Section: Vol. 39, No. 1 - EDGAR UGG - September 2024 ISD
Title: CASH MANAGEMENT OF GRANTS
Code: po6112
Status: Active

Revised Policy - Vol. 39, No. 1 - EDGAR/UGG Revisions

6112 - CASH MANAGEMENT OF GRANTS

In order to provide reasonable assurance that all assets, including Federal, State, and local funds, are safeguarded against waste, loss, unauthorized use, or misappropriation, the Superintendent shall implement internal controls in the area of cash management.

The District's payment methods shall minimize the time elapsing between the transfer of funds from the ~~United States Treasury~~ Federal agency or the Michigan Department of Education (MDE) (pass-through entity) and disbursement by the District, regardless of whether the payment is made by electronic fund transfer, or issuance or redemption of checks, warrants, or payment by other means.

The District shall use forms and procedures required by the grantor agency or pass-through entity to request payment. The District shall request grant ~~funds~~ fund payments in accordance with the provisions of the grant. Additionally, the District's financial management systems shall meet the standards for fund control and accountability as established by the awarding agency.

The Superintendent is authorized to submit ~~requests for advance payments and reimbursements at least monthly when electronic fund transfers are not used, and as often as deemed appropriate when electronic transfers are used, in accordance with the provisions of~~ payment requests as often as necessary when electronic fund transfers are used or at least monthly when electronic transfers are not used. See the Electronic Fund Transfer Act (15 U.S.C. 1693-1693r).

When the District uses a cash advance payment method, the following standards shall apply:

- A. The timing and amount of the advance payment requested ~~will~~ must be as close as is administratively feasible to the actual disbursement by the District for direct program or project costs and the proportionate share of any allowable indirect costs.
- B. The District shall make timely ~~payment~~ payments to contractors in accordance with contract provisions.
- C. Whenever possible, advance payment requests by the District must be consolidated to cover anticipated cash needs for all Federal awards received by the recipient from the awarding Federal agency or MDE.
- D. ~~To the extent~~ If available, the District shall disburse funds available from program income (including repayments to a revolving fund), rebates, refunds, contract settlements, audit recoveries, and interest earned on ~~such~~ Federal funds before requesting additional cash payments. **[DRAFTING NOTE: It is generally recommended that the District request that program income be added to their total award, but separating program income out and then noting how to address these applicable credits.]**
- E. The District shall account for the receipt, obligation, and expenditure of funds.
- F. Advance payments will be deposited and maintained in insured accounts whenever possible.
- G. Advance payments will be maintained in interest-bearing accounts unless the following apply:
 1. The District receives less than ~~\$120,000~~ 250,000 in Federal ~~awards~~ funding per year.

2. The best ~~reasonably~~ available interest-bearing account would not reasonably be expected to earn interest in excess of \$500 per year on Federal cash balances.
3. The depository would require an average or minimum balance so high that it would not be feasible within the expected Federal and non-Federal cash resources.
4. A foreign government or banking system prohibits or precludes interest-bearing accounts.
- ~~4.5. An interest-bearing account is not readily accessible (for example, due to public or political unrest in a foreign country).~~
- H. Pursuant to Federal law and regulations, the District may retain interest earned in an amount up to \$500 per year for administrative costs. Any additional interest earned on Federal ~~advance payments deposited in interest-bearing accounts must be remitted—funds must be returned~~ annually to the Department of Health and Human Services Payment Management System ("PMS") through an electronic medium using either the Automated Clearing House ("ACH") network or a Fedwire Funds Service payment. ~~Remittances shall include pertinent information of the payee and nature of payment in the memo area (often referred to as "addenda records" by Financial Institutions) as that will assist in the timely posting of interest earned on Federal funds. Pertinent details include the Payee Account Number ("PAN") if the payment originated from PMS, or Agency information if the payment originated from Automated Standard Application for Payment ("ASAP"), National Science Foundation ("NSF"), or another Federal agency payment system.~~
- I. All interest in excess of \$500 per year must be returned to PMS regardless of whether the District was paid through PMS. Instructions for returning interest can be found at <https://pms.psc.gov/grant-recipients/returning-funds-interest.html>.
- J. All other Federal funds must be returned to the payment system of the Federal agency. Returns should follow the instructions provided by the Federal agency. All returns to PMS should follow the instructions provided at <https://pms.psc.gov/grant-recipients/returning-funds-interest.html>.

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Legal References

2 C.F.R. 200.305

Classification	Topic	Revised
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Book: Policies for ISD Update
Section: Vol. 39, No. 1 - EDGAR UGG - September 2024 ISD
Title: COST PRINCIPLES - SPENDING FEDERAL FUNDS
Code: po6114
Status: Active

Revised Policy - Vol. 39, No. 1 - EDGAR/UGG Revisions

6114 - COST PRINCIPLES - SPENDING FEDERAL FUNDS

The Superintendent is responsible for the efficient and effective administration of grant funds through the application of sound management practices. Such funds shall be administered in a manner consistent with all applicable Federal, State, and local laws, the associated agreements/assurances, program objectives, and the specific terms and conditions of the grant award.

Cost Principles

A cost is reasonable if it does not exceed an amount that a prudent person would incur under the circumstances prevailing when the decision was made to incur the cost. Except where otherwise authorized by statute, costs shall meet the following general criteria in order to be allowable under Federal awards:

- A. Be necessary and reasonable for proper and efficient performance and administration of the Federal award and be allocable thereto under these principles.

To determine whether a cost is reasonable, consideration shall be given to:

1. whether a cost is ~~a type~~ generally recognized as ordinary and necessary for the operation ~~of the District~~ or the proper and efficient performance of the Federal award;
2. the restraints or requirements imposed by such factors as sound business practices, arm's length bargaining, Federal, State, local, tribal, and other laws and regulations;
3. market prices for comparable ~~goods or services~~ costs for the geographic area;
4. whether the individuals concerned acted with prudence in the circumstances considering their responsibilities to the District, its employees, its students or membership (if applicable), the public at large, and the Federal Government; and
5. ~~whether the cost represents any significant deviation from the established practices or Board of Education policy which may unjustifiably increase the expense~~ the degree to which the cost represents a deviation from the Board of Education's established written policies and procedures for incurring costs.

While Federal regulations do not provide specific descriptions of what satisfies the "necessary" element beyond its inclusion in the reasonableness analysis above, whether a cost is necessary is determined based on the needs of the program. Specifically, the expenditure must be necessary to achieve an important program objective. A key aspect in determining whether a cost is necessary is whether the District can demonstrate that the cost addresses an existing need, and can prove it.

When determining whether a cost is necessary, consideration may be given to whether:

1. the cost is needed for the proper and efficient performance of the grant program;
2. the cost is identified in the approved budget or application;
3. there is an educational benefit associated with the cost;
4. the cost aligns with identified needs based on results and findings from a needs assessment;

5. the cost addresses program goals and objectives and is based on program data.

A cost is allocable to the Federal award if the ~~goods or services involved are chargeable or cost~~ is assignable to ~~the that~~ Federal award in accordance with the relative benefit received. This standard is met if the cost: is incurred specifically for the Federal award; benefits both the Federal award and other work of the District and can be distributed in proportions that may be approximated using reasonable methods; ~~and or~~ is necessary to the overall operation of the District and is assignable in part to the Federal award in accordance with these cost principles ~~mentioned here~~.

- B. Conform to any limitations or exclusions set forth in the cost principles in 2 C.F.R. Part 200 or in the terms and conditions of the Federal award, including prohibitions regarding costs incurred for telecommunications and video surveillance services or equipment or as a substantial or essential component of any system or as critical technology as part of any system. Such prohibition also applies to funds generated as program income, indirect cost recoveries, or to satisfy cost share requirements.
- C. Be consistent with policies and procedures that apply uniformly to both Federally-financed and other activities of the District.
- D. Be accorded 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 allocated to a Federal award as an indirect cost under another award.
- E. Be determined in accordance with generally accepted accounting principles.
- F. Be representative of actual cost, net of all applicable credits or offsets.

The term "applicable credits" refers to those ~~receipts or reductions of expenditures that operate to offset or reduce expense items~~ transactions that offset or reduce direct or indirect costs allocable to the Federal award. Typical examples of such transactions are: purchase discounts; rebates or allowances; recoveries or indemnities on losses; insurance refunds or rebates; and adjustments of overpayments or erroneous charges. To the extent that such credits accruing to or received by the ~~State~~ District relating to the Federal award, they shall be credited to the Federal award, either as a cost reduction or a cash refund, as appropriate.

- G. Be not included as a match or cost-share, unless the specific Federal program authorizes Federal costs to be treated as such.
- H. Be adequately documented:
 1. in the case of personal services, the Superintendent shall implement a system for District personnel to account for time and efforts expended on grant-funded programs to assure that only permissible personnel expenses are allocated;
 2. in the case of other costs, all receipts and other invoice materials shall be retained, along with any documentation identifying the need and purpose for such expenditure if not otherwise clear.
- I. Administrative closeout costs may be incurred until the due date of the final report(s). If incurred, these costs must be liquidated prior to the due date of the final report(s) and charged to the final budget period of the award unless otherwise specified by the Federal agency.

~~Be~~ All other costs must be incurred during the approved budget period.

The budget period means the time interval from the start date of a funded portion of an award to the end date of that funded portion during which recipients are authorized to ~~carry out authorized work and expend~~ incur financial obligations the funds awarded, including any funds carried forward or other revisions pursuant to ~~the law~~ 2 C.F.R. 200.308. Prior written approval from the Federal ~~awarding~~ agency or State pass-through entity may be required to carry forward unobligated balances to subsequent budget periods unless waived.

Selected Items of Cost

The District shall follow the rules for selected items of cost at 2 C.F.R. Part 200, Subpart E when charging these specific expenditures to a Federal grant. When applicable, District staff shall check costs against the selected items of cost requirements to ensure the cost is allowable. In addition, State, District, and program-specific rules, including the terms and conditions of the award, may deem a cost as unallowable and District personnel shall follow those rules as well.

The following rules of allowability must apply to equipment and other capital expenditures:

- A. Capital expenditures for general purpose equipment, buildings, and land are ~~unallowable~~allowable as direct charges, ~~except~~but only with the prior written approval of the Federal ~~awarding~~agency or pass-through entity.
- B. Capital expenditures for special purpose equipment are allowable as direct costs, provided that items with a unit cost of \$~~5,000~~10,000 or more have the prior written approval of the Federal ~~awarding~~agency or pass-through entity.
- C. Capital expenditures for improvements to land, buildings, or equipment ~~that~~which materially increase their value or useful life are ~~unallowable~~allowable as a direct cost ~~except~~but only with the prior written approval of the Federal ~~awarding~~agency or pass-through entity.
- D. All Federally-funded contracts in excess of \$2,000 related to construction, alterations, repairs, painting, decorating, etc. must comply with Davis-Bacon prevailing wage requirements.
- E. Allowability of depreciation on buildings, capital improvements, and equipment shall be in accordance with 2 C.F.R. 200.436 and 2 C.F.R. 200.465.
- F. When approved as a direct cost by the Federal ~~awarding~~agency or pass-through entity under Sections A-C, capital expenditures will be charged in the period in which the expenditure is incurred or as otherwise determined appropriate and negotiated with the Federal ~~awarding~~agency.
- G. The District may claim the unamortized portion of any equipment written off as a result of a change in capitalization levels by continuing to claim the otherwise allowable depreciation on the equipment, or by amortizing the amount to be written off over a period of years negotiated with the cognizant agency for indirect cost.
- H. If the District is instructed by the Federal ~~awarding~~agency to otherwise dispose of or transfer the equipment, the costs of such disposal or transfer are allowable.
- I. Equipment and other capital expenditures are unallowable as indirect costs.

Statutory requirements may limit the allowability of costs. Any costs that exceed the maximum amount allowed by statute may not be charged to the Federal award. Only the amount allowable by statute may be charged to the Federal award.

Payments made for costs determined to be unallowable by the Federal agency, cognizant agency for indirect costs, or pass-through entity must be refunded (with interest) to the Federal Government.

Prior Written Approval

To avoid subsequent disallowance or dispute based on unreasonableness or nonallocability, the District may seek the prior written approval of the Federal agency (or, for indirect costs, the cognizant agency for indirect costs) before incurring the cost. The absence of prior written approval on any element of cost will not, in itself, affect the reasonableness or allocability of that cost unless prior approval is specifically required for allowability.

Cost Compliance

The Superintendent shall require that grant program funds are expended and are accounted for consistent with the requirements of the specific program and as identified in the grant application. Compliance monitoring includes accounting for direct or indirect costs and reporting them as permitted or required by each grant. Costs incurred for the same purpose in like circumstances shall be treated consistently as either direct or indirect costs, but may not be double charged or inconsistently charged as both.

Determining Whether a Cost is Direct or Indirect:

The association of costs with a Federal award (rather than the nature of the procurement transaction) determines whether costs are direct or indirect. Costs incurred for the same purpose in like circumstances must be treated consistently as direct or indirect.

- A. Direct costs are those costs that can be identified specifically with a particular final cost objective, such as a Federal award, or other internally or externally funded activity, or that can be directly assigned to such activities relatively easily with a high degree of accuracy.

These costs may include: salaries and fringe benefits of employees working directly on a grant-funded project; purchased services contracted for performance under the grant; travel of employees working directly on a grant-funded project; materials, supplies, and equipment purchased for use on a specific grant; program evaluation costs or other institutional service operations; and infrastructure costs directly attributable to the program (such as long-distance telephone calls specific to the program, etc.). Direct costs may also include capital expenditures if approved by the Federal ~~awarding~~-agency or pass-through entity, as well as capital expenditures for special purpose equipment with a unit cost of less than ~~\$5,000~~10,000.

If a cost benefits two (2) or more projects or activities in proportions that can be determined without undue effort or cost, the cost must be allocated to the projects based on the proportional benefit.

- B. Indirect costs are those that have been incurred for a common or joint purpose benefitting more than one (1) cost objective and not readily assignable to the cost objectives specifically benefitted without effort disproportionate to the results achieved. Costs incurred for the same purpose in like circumstances shall be treated consistently as either direct or indirect costs.

These costs may include: general data processing, human resources, utility costs, maintenance, accounting, etc.

Federal education programs with supplement, not supplant, provisions must use a restricted indirect cost rate. In a restricted rate, indirect costs are limited to general management costs. General management costs do not include divisional administration that is limited to one (1) component of the District, the governing body of the District, compensation of the Superintendent, compensation of the chief executive officer of any component of the District, and operation of the immediate offices of these officers.

The salaries of administrative and clerical staff should normally be treated as indirect costs. Direct charging of these costs may be appropriate only if all of the following conditions are met:

1. Administrative or clerical services are integral to a project or activity.
2. Individuals involved can be specifically identified with the project or activity.
3. Such costs are explicitly included in the budget or have the prior written approval of the Federal ~~awarding~~-agency.
4. The costs are not also recovered as indirect costs.

Where a Federal program has a specific cap on the percentage of administrative costs that may be charged to a grant, that cap shall include all direct administrative charges as well as any recovered indirect charges.

Effort should be given to identify costs as direct costs whenever practical, but allocation of indirect costs may be used where not prohibited and where indirect cost allocation is approved ahead of time by the

Michigan Department of Education (MDE) or the pass-through entity (Federal funds subject to 2 C.F.R. Part 200 pertaining to determining indirect cost allocation).

~~Equipment and other capital expenditures are unallowable as indirect costs.~~

Timely Obligation of Funds

Financial obligations are orders placed for property and services, contracts and subawards made, and similar transactions that require payment under a Federal award that will result in expenditures by a recipient or subrecipient under a Federal award. ~~This term is used when referencing a recipient's or subrecipient's use of funds under a Federal award.~~

The following list illustrates when funds are determined to be obligated under the U.S. Department of Education ("USDOE") regulations:

If the obligation is for:

- A. Acquisition of property - on the date which the District makes a binding written commitment to acquire the property.
- B. Personal services by an employee of the District - when the services are performed.
- C. Personal services by a contractor who is not an employee of the District - on the date which the District makes a binding written commitment to obtain the services.
- D. Performance of work other than personal services - on the date when the District makes a binding written commitment to obtain the work.
- E. Public utility services - when the District receives the services.
- F. Travel - when the travel is taken.
- G. Rental of property - when the District uses the property.
- H. A pre-agreement cost that was properly approved by the Secretary (USDOE) under the cost principles in 2 C.F.R. Part 200, Subpart E - Cost Principles - on the first day of the project period.

Period of Performance

All financial obligations must occur during the period of performance. ~~Period of performance means the total estimated time interval between the start of an initial Federal award when the District is permitted to carry out the work authorized by the grant and the planned end date. The period of performance may include one (1) or more funded portions or budget periods.~~ Period of performance means the time interval between the start and end date of a Federal award, which may include one (1) or more budget periods. Identification of the period of performance shall be specific to the Federal award and consistent with 2 C.F.R. 200.211 and does not commit the Federal agency to fund the award beyond the currently approved budget period. The period of performance is dictated by statute and will be indicated in the grant award notification ("GAN"). As a general rule, State-administered Federal funds are available for obligation within the year that Congress appropriates the funds for. However, given the unique nature of educational institutions, for many Federal education grants, the period of performance is twenty-seven (27) months. This maximum period includes a fifteen (15) month period of initial availability, plus a twelve (12) month period for carryover. For direct grants, the period of performance is generally identified in the GAN. Note, however, that certain Federal awards have specific requirements that restrict the use of funds beyond the initial period of performance.

In the case of a State-administered grant, financial obligations under a grant may not be made until the application is approved or is in substantially approvable form, whichever is later. In the case of a direct grant, a grantee may use grant funds only for obligations it makes during the grant period unless an agreement exists with the ~~awarding~~ agency or the pass-through entity (e.g., MDE) to reimburse for pre-approval expenses.

If a Federal ~~awarding~~ agency or pass-through entity approves an extension, or if the District extends under C.F.R. 200.308(e)(2), the Period of Performance will be amended to end at the completion of the extension.

If a termination occurs, the Period of Performance will be amended to end upon the effective date of termination. If a renewal is issued, a distinct Period of Performance will begin.

For both State-administered and direct grants, regardless of the period of availability, the District shall liquidate all financial obligations incurred under the award not later than ninety (90) calendar days after the ~~end of the funding period unless an extension is authorized~~ conclusion of the period of performance of the award (or an earlier date as agreed upon by MDE and the District). Any funds not obligated within the period of performance or liquidated within the appropriate timeframe are said to lapse and shall be returned to the ~~awarding~~ agency. Consequently, the District shall closely monitor grant spending throughout the grant cycle.

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Legal References

2 C.F.R. 200.216, 200.344(b), 200.403-.407, 200.413(a)-(c), 200.430(a), 200.431(a), 200.439(b)(2), 200.458

2 C.F.R. 200.474(b)

34 C.F.R. 76.707-.708(a), 75.703

Classification Topic Revised

Book: Policies for ISD Update
Section: Vol. 39, No. 1 - EDGAR UGG - September 2024 ISD
Title: Vol. 39, No. 1 - EDGAR UGG - September 2024 Revised PROCUREMENT - FEDERAL GRANTS/FUNDS
Code: po6325
Status: Active

Revised Policy - Vol. 39, No. 1 - EDGAR/UGG Revisions

6325 - PROCUREMENT – FEDERAL GRANTS/FUNDS

Procurement of all supplies, materials, equipment, and services paid for from Federal funds or District matching funds shall be made in accordance with all applicable Federal, State, and local statutes and/or regulations, the terms and conditions of the Federal grant, Board of Education policies, and administrative procedures.

The Superintendent shall have and use a procurement and contract administration system in accordance with the USDOE requirements (2 C.F.R. 200.317-.326), including affirmative steps for small businesses, and minority-owned businesses and, women's-women-owned business-enterprises, veteran-owned businesses, and labor surplus area firms for the administration and management of Federal grants and Federally-funded programs. The District shall maintain oversight that requires contractors to perform in accordance with the terms, conditions, and specifications of their contracts or purchase orders. Except as otherwise noted, procurement transactions shall conform to the provisions of the District's documented general purchasing Policy 6320 and AG 6320A.

When required by Federal program legislation, all Federally-funded contracts in excess of \$2,000 related to construction, alteration, repairs, painting, decorating, etc. must comply with Davis-Bacon prevailing wage requirements.

All District employees, officers, and agents who have purchasing authority shall abide by the standards of conduct covering conflicts of interest and governing the actions of its employees, officers, and agents engaged in the selection, award, and administration of contracts as established in Policy 1130, Policy 3110, and Policy 4110 – Conflict of Interest.

The District will avoid acquisition of unnecessary or duplicative items. ~~Additionally, consideration~~ Consideration shall be given to consolidating or breaking out procurements to obtain a more economical purchase, ~~and where appropriate, an analysis shall be made of lease versus purchase alternatives and any other appropriate analysis to determine the most economical approach.~~ When appropriate, an analysis shall be made between leasing and purchasing property or equipment to determine the most economical approach. These considerations are given as part of the process to determine the allowability of each purchase made with Federal funds.

To foster greater economy and efficiency, the District may enter into State and local intergovernmental agreements where appropriate for procurement or use of common or shared goods and services.

Competition

All procurement transactions ~~for the acquisition of property or services required under a~~ under the Federal award paid for from Federal funds or District matching funds shall be conducted in a manner that ~~encourages~~ provides full and open competition and that is in accordance with 2 C.F.R. Part 200, good administrative practice, and sound business judgment. ~~In order to promote~~ To ensure objective contractor performance and eliminate unfair competitive advantage, the District shall exclude any contractor that has developed or drafted specifications, requirements, statements of work, or invitations for bids ~~or requests for proposals~~ from competition for such procurements.

~~Some of the situations considered to be restrictive of competition include, but are not limited to, the following~~ Examples of situations that may restrict competition include, but are not limited to:

- A. unreasonable requirements on firms ~~in order~~ for them to qualify to do business;
- B. unnecessary experience and excessive bonding requirements;
- C. noncompetitive pricing practices between firms or between affiliated companies;
- D. noncompetitive contracts to consultants that are on retainer contracts;
- E. organizational conflicts of interest;
- F. specification of only a "brand name" product instead of allowing for an "or equal" product to be offered and describing the performance or other relevant requirements of the procurement; and
- G. any arbitrary action in the procurement process.

~~Further, the District does not use statutorily or administratively imposed State, local, or tribal geographical preferences in the evaluation of bids or proposals, unless 1) an applicable Federal statute expressly mandates or encourages a geographic preference; or 2) the District is contracting for architectural and engineering services, in which case geographic location may be a selection criterion provided its application leaves an appropriate number of qualified firms, given the nature and size of the project, to compete for the contract.~~

To the extent that the District uses a pre-qualified list of persons, firms, or products to acquire goods and services that are subject to this policy, the pre-qualified list includes enough qualified sources as to ensure maximum open and free competition. The District allows vendors to apply for consideration to be placed on the list at any time. ~~[INSERT FREQUENCY; SEE DRAFTING NOTE].~~

~~[DRAFTING NOTE: The District shall allow vendors not on the pre-qualified list to apply for placement on the list periodically. The District may determine how frequently the pre-qualified list becomes open for new vendors or whether it is open continuously.]~~

The District shall require that all prequalified lists of persons, firms, or products which are used in ~~acquiring goods and services are current and include enough qualified sources to provide maximum open and free competition~~ procurement transactions are current and include enough qualified sources to provide maximum open competition. When establishing or amending prequalified lists, the District (or subrecipient) must consider objective factors that evaluate price and cost to maximize competition. The District shall not preclude potential bidders from qualifying during the solicitation period.

To the extent consistent with established practices and legal requirements applicable to the recipient or subrecipient, this subpart does not prohibit recipients or subrecipients from developing written procedures for procurement transactions that incorporate a scoring mechanism that rewards bidders that commit to specific numbers and types of U.S. jobs, minimum compensation, benefits, on-the-job training for employees making work products or providing services on a contract, and other worker protections. This subpart also does not prohibit recipients and subrecipients from making inquiries of bidders about these subjects and 2 C.F.R. Revisions 2024: Unofficial Comparison Version assessing the responses. Any scoring mechanism must be consistent with the U.S. Constitution, applicable Federal statutes and regulations, and the terms and conditions of the Federal award.

Solicitation Language (Purchasing Procedures)

The District shall have written procurement procedures (in accordance with 2 C.F.R. 200.319(d)) that require that all solicitations made pursuant to this policy incorporate a clear and accurate description of the technical requirements for the ~~material, product, or service to be procured. Such description shall not, in competitive procurements, contain features which unduly restrict competition. property, equipment, or service being procured.~~ The description may include a statement of the qualitative nature of the ~~material and/or product property, equipment, or service to be procured and, when necessary, shall~~ material. ~~When necessary, the description must set forth those minimum essential characteristics and standards to which it shall conform if it is to satisfy its intended use the property, equipment, or service shall conform.~~ Detailed product specifications should be avoided if at all possible.

When it is impractical or uneconomical to ~~make a clear and accurate description of~~ clearly and accurately describe the technical requirements, a "brand name or equivalent" description ~~may be used as a means to~~

~~define the performance or other salient requirements of procurement. The specific features of the named brand which shall be met by offers shall be clearly stated; and identify all requirements which the offerors shall fulfill and all other factors to be used in evaluating bids or proposals~~ of features to provide procurement requirements may be used. The specific features of the named brand must be clearly stated and the District must identify any additional requirements which the offerors must fulfill and all other factors that will be used in evaluating bids or proposals.

The Board will not approve any expenditure for an unauthorized purchase or contract.

Procurement Methods

The District shall have and use documented procedures, consistent with the standards described above for the following methods of procurement:

A. Informal Procurement Methods

~~When the value of the procurement for property or services~~ Informal procurement methods for small purchases expedite the completion of transactions, minimize administrative burdens, and reduce costs. Informal procurement methods may be used when the value of the procurement transaction under a Federal award does not exceed the simplified acquisition threshold, or a lower threshold established by the State, formal procurement methods are not required. The ~~District may use informal procurement methods to expedite the completion of its transactions and minimize the associated administrative burden and cost. The informal methods used for procurement of property or services at or below the simplified acquisition threshold~~ informal procurement methods include:

1. Micro-Purchases

Procurement by micro-purchase is the acquisition of supplies or services, the aggregate dollar amount of which does not exceed \$_____ **[not to exceed \$10,000]** fifty percent (50%) of the amount allowed by State statute for a single item (For 2024-2025, micro-purchase level is \$15,256). To the ~~maximum~~ extent practicable, the District should distribute micro-purchases equitably among qualified suppliers. Micro-purchases may be made without soliciting competitive quotations if the Superintendent considers the price to be reasonable based on research, experience, purchase history, or other relevant information, and ~~documents are filed accordingly~~ maintains documents to support its conclusion. The District shall maintain evidence of this reasonableness in the records of all purchases made by this method.

~~[] Unless otherwise defined by State or local law, Districts are responsible for determining and documenting an appropriate micro-purchase threshold based on internal controls, an evaluation of the risk, and its documented procurement procedures. The micro-purchase threshold used by the District shall be authorized or not prohibited under State, local, or tribal laws or regulations. An eligible District may self-certify a threshold up to \$50,000 on an annual basis and must maintain documentation to be made available to the Federal agency or pass-through entity and auditors in accordance with C.F.R. 200.334A District which is qualified as a low-risk auditee for the most recent audit (C.F.R. 200.520) may increase the micro-purchase threshold up to \$_____ **[SEE DRAFTING NOTE].** An eligible District may self-certify the micro-purchase threshold on an annual basis after completing the annual internal institutional risk assessment to identify, mitigate, and manage financial risks. The self-certification, in accordance with C.F.R. 200.334, must include a justification, clear identification of the threshold, and supporting documentation of any of the following: the qualifications listed above.~~

- a. ~~a qualification as a low-risk auditee, in accordance with the criteria in C.F.R. 200.520;~~
- b. ~~an annual internal institutional risk assessment to identify, mitigate, and manage financial risks; or~~
- c. ~~For public institutions, a higher threshold is consistent with State law.~~

~~[DRAFTING NOTE: The Federal regulation allows for a \$50,000 threshold, however, the Revised School Code provides for a lower amount (\$29,572 for the 2023-24 fiscal year \$26,046 for the 2021-22 year). While this authority is allowed for an entity qualified as a low-risk auditee, Neola does not suggest its use due to the complexity and subjectivity of the mechanism.]~~

2. Small Purchases

Small purchases include the acquisition of property or services, the aggregate dollar amount of which is higher than the micro-purchase threshold but does not exceed ~~the simplified acquisition threshold of \$~~ the competitive bid threshold established by the State of Michigan under M.C.L. Section 623a. Small purchase procedures require that price or rate quotations shall be obtained from ~~[CHOOSE AN OPTION] ()~~ [ENTER AMOUNT; SEE DRAFTING NOTE] (X) an adequate number of ~~[END OF OPTION]~~ qualified sources. ~~[DRAFTING NOTE: 1. The competitive threshold for the 2023-24 fiscal year is \$29,572, effective October 23, 2023 2021-22 year is \$26,046, effective October 7, 2021. 2. Unless the pass-through entity or State law defines the number of quotes required, the District may define in policy how many quotations are adequate. The number must be greater than one (1).]~~

Districts are responsible for determining an appropriate simplified acquisition threshold based on internal controls, an evaluation of risk, and its documented procurement procedures which must not exceed the threshold established in the Federal Acquisition Regulations (FAR). When applicable, a lower simplified acquisition threshold used by the ~~non-Federal entity~~ District must be authorized or not prohibited under State, local, or tribal laws or regulations.

B. Formal Procurement Methods

When the value of the procurement for property or services under a Federal award exceeds the simplified acquisition threshold, or a lower threshold established by the State, formal procurement methods are required. Formal procurement methods require following documented procedures. Formal procurement methods also require public advertising unless a non-competitive procurement method can be used in accordance with the standards on competition in C.F.R. 200.319 or non-competitive procurement. The formal methods of procurement are:

1. Sealed Bids

Sealed, competitive bids shall be obtained when the purchase of, and contract for, single items of supplies, materials, or equipment which amounts to more than the amount allowed by Michigan statute and when the Board determines to build, repair, enlarge, improve, or demolish a school building/facility the cost of which will exceed the amount allowed by Michigan statute. ~~[DRAFTING NOTE: The fiscal year 2021-22 2023-2024 base pertaining to construction, renovation, repair, or remodeling and the base pertaining to procurement of supplies, materials, and equipment is \$26,046, effective October 7, 2021 \$29,572, effective October 23, 2023.]~~

In order for sealed bidding to be feasible, the following conditions shall be present:

- a. a complete, adequate, and realistic specification or purchase description is available;
- b. two (2) or more responsible bidders ~~are~~ have been identified as willing and able to compete effectively for the business; and

- c. the procurement lends itself to a firm, fixed-price contract and the selection of the successful bidder can be made principally based on ~~the basis of~~ price.

When sealed bids are used, the following requirements apply:

- a. Bids shall be solicited in accordance with the provisions of State law and Policy 6320. Bids shall be solicited from ~~{CHOOSE OPTION} ()~~ {ENTER AMOUNT} (X) an adequate number of ~~{END OF OPTION}~~ qualified suppliers, providing sufficient response time prior to the date set for the opening of bids. The invitation to bid shall be publicly advertised.
- b. The invitation for bids ~~will include product/contract specifications and pertinent attachments and shall define the items and/or services required in order for the bidder to properly respond~~ must define the items or services with specific information, including any required specifications, for the bidder to properly respond.
- c. All bids will be opened at the time and place prescribed in the invitation for bids; bids will be opened publicly.
- d. A firm, fixed-price contract ~~award will be made~~ is awarded in writing to the lowest responsive bid and responsible bidder. ~~Where specified in bidding documents~~ When specified in the invitation for bids, factors such as discounts, transportation costs, and life cycle costs shall be considered in determining which bid is lowest. Payment discounts ~~may~~ must only be used to determine the low bid when the District determines they are a valid factor based on prior experience ~~indicates that such discounts are usually taken.~~
- e. The Board reserves the right to reject any or all bids, but must document and provide a justification for all bids it rejects for sound documented reason.

2. Proposals

Procurement by proposals is a method in which either a fixed-price or cost-reimbursement ~~type~~ contract is awarded. ~~Proposals are generally~~ This method is used when conditions are not appropriate for the use of sealed bids or in the case of a recognized exception to the sealed bid method. ~~{DRAFTING NOTE: Like sealed bids, Federal law does not require a competitive proposal unless the procurement is for over \$250,000. The State/District may set a lower threshold for sealed bids and competitive proposals. Michigan law stipulates a threshold for which sealed bids are required. The competitive threshold for the 2023-24 fiscal year is \$29,572 effective October 23, 2023 2021-22 year is \$26,046, effective October 7, 2021. (See Policy 6320.)}~~

If this method is used, the following requirements apply:

- a. Requests for proposals ~~shall be publicized and~~ require public notice, and must identify all evaluation factors and their relative importance. ~~Any response to the publicized requests for proposals shall be considered to the maximum extent practical~~ To the maximum extent practicable, any proposals submitted in response to the public notice must be considered.
- b. Proposals shall be solicited from ~~{CHOOSE OPTION} ()~~ {ENTER AMOUNT} (X) an adequate number of ~~{END OF OPTION}~~ sources.
- c. The District ~~shall use its written method~~ must have written procedures for conducting technical evaluations ~~of the proposals received and for selecting recipients~~ and for making selections.

- d. Contracts ~~shall~~must be awarded to the responsible ~~firm~~offeror whose proposal is most advantageous to the ~~program, with price and other factors considered~~District considering price and other factors.

The District may use competitive proposal procedures for qualifications-based procurement of architectural/engineering (A/E) professional services whereby the competitors' qualifications are evaluated and the most qualified competitor is selected, subject to negotiation of fair and reasonable compensation. The method, where the price is not used as a selection factor, can only be used ~~in the procurement of to procure~~ A/E professional services. ~~It~~The method cannot be used to purchase other ~~types of services, though provided by~~ A/E firms that are a potential source to perform the proposed effort.

3. Noncompetitive Procurement

Procurement by noncompetitive proposals ~~allows for solicitation of a proposal from only one (1) source and~~ may be used only when one (1) or more of the following circumstances apply:

- a. ~~micro purchases~~the aggregate amount of the procurement transaction does not exceed the micro-purchase threshold;
- b. ~~the item is available only from~~the procurement transaction can only be fulfilled by a single source;
- c. the public exigency or emergency for the requirement will not permit a delay resulting from ~~publicizing~~providing public notice of a competitive solicitation;
- d. ~~the Federal awarding agency or pass-through entity expressly authorizes noncompetitive proposals in response to a written request from the District~~the District requests in writing to use a noncompetitive procurement method, and the Federal agency or pass-through entity provides written approval; or
- e. after ~~solicitation of a number of~~soliciting several sources, competition is determined to be inadequate.

Domestic Preference for Procurement

~~As appropriate and to the extent consistent with law, the District shall~~The District should, to the extent practicable ~~under a Federal award and consistent with law~~, provide a preference for the purchase, acquisition, or use of goods, products, or materials produced in the United States. Such requirements shall be included in all subawards, ~~including all~~ contracts, and purchase orders ~~for work or products~~ under the Federal award.

Procurement of Recovered Materials

The District must comply with Section 6002 of the Solid Waste Disposal Act, as amended by the Resource Conservation and Recovery Act of 1976, as amended, 42 U.S.C. 6962. These requirements include:

- A. procuring only items designated in the guidelines of the Environmental Protection Agency (EPA) at 40 C.F.R. part 247 that contain the highest percentage of recovered materials practicable, consistent with maintaining a satisfactory level of competition, where the purchase price of the item exceeds \$10,000 or the value of the quantity acquired during the preceding fiscal year exceeded \$10,000;
- B. procuring solid waste management services in a manner that maximizes energy and resource recovery; and
- C. establishing an affirmative procurement program for the procurement of recovered materials identified in the EPA guidelines.

The District should, to the greatest extent practicable and consistent with law, purchase, acquire, or use products and services that can be reused, refurbished, or recycled; contain recycled content, are biobased, or are energy and water efficient; and are sustainable.

This may include purchasing compostable items and other products and services that reduce the use of single-use plastic products.

Contract/Price Analysis

The District shall perform a cost or price analysis ~~in connection with every procurement action in excess of \$250,000, including contract modifications~~ for every procurement transaction, including contract modifications, in excess of the Simplified Acquisition Threshold (currently \$250,000). The method and degree of analysis conducted depend on the facts surrounding the particular procurement transaction. For example, the District should consider potential workforce impacts in their analysis if the procurement transaction will displace public sector employees. However, as a starting point, the District must make independent estimates before receiving bids or proposals. A cost analysis generally means evaluating the separate cost elements that make up the total price, while a price analysis means evaluating the total price, without looking at the individual cost elements. The District must not use the "cost plus a percentage of cost" and "percentage of construction costs" methods of contracting.

~~The method and degree of analysis are dependent on the facts surrounding the particular procurement situation; however, the District shall come to an independent estimate prior to receiving bids or proposals.~~ Costs or prices based on estimated costs for contracts under the Federal award are allowable only to the extent that the costs incurred or cost estimates included in negotiated prices would be allowable for the District according to cost principle requirements.

~~When performing a cost analysis, the District shall negotiate 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.~~

Time and Materials Contracts

The District uses a time-and-materials type contract only 1) after a determination that no other contract is suitable, and 2) if the contract includes a ceiling price that the contractor exceeds at its own risk. A time-and-materials type contract means a contract whose cost to the District is the sum of the actual costs of materials and direct labor hours charged at fixed hourly rates that reflect wages, general and administrative expenses, and profit.

~~Since~~Because this formula generates an open-ended contract price, a time-and-materials contract provides no positive profit incentive to the contractor for cost control or labor efficiency. Therefore, the District sets a ceiling price for each contract that the contractor exceeds at its own risk. Further, the District shall assert a high degree of oversight ~~in order~~ to obtain reasonable assurance that the contractor is using efficient methods and effective cost controls.

Suspension and Debarment

The District will award contracts only to responsible contractors ~~possessing~~that possess the ability to perform successfully under the terms and conditions of the proposed ~~procurement contract~~. All purchasing decisions shall be made in the best interests of the District and shall seek to obtain the maximum value for each dollar expended. When making a purchasing decision, the District shall consider such factors as 1) contractor integrity; 2) ~~compliance with~~ public policy; 3) compliance; 4) proper classification of employees; 5) record of past performance; and 6) ~~4)~~ financial and technical resources.

~~The Superintendent shall have the authority to suspend or debar a person/corporation, for cause, from consideration or award of further contracts. The District is subject to and shall abide by the nonprocurement debarment and suspension regulations implementing Executive Orders 12549 and 12689, 2 C.F.R. Part 180.~~

~~Suspension is an action taken by the District that immediately prohibits a person from participating in covered transactions and transactions covered under the Federal Acquisition Regulation (48 C.F.R. Chapter 1) for a temporary period, pending completion of an agency investigation and any judicial or administrative proceedings that may ensue. A person so excluded is suspended. (2 C.F.R. Part 180 Subpart G)~~

~~Debarment is an action taken by the Superintendent to exclude a person from participating in covered transactions and transactions covered under the Federal Acquisition Regulation (48 C.F.R. Chapter 1). A person so excluded is debarred. (2 C.F.R. Part 180 Subpart H).~~

The District shall not subcontract with or award subgrants to any person or company who is debarred or suspended. For contracts over \$25,000, the District shall confirm that the vendor is not debarred or suspended by either checking the Federal government's System for Award Management, which maintains a list of such debarred or suspended vendors, at www.sam.gov; collecting a certification from the vendor; or adding a clause or condition to the covered transaction with that vendor. (2 C.F.R. Part 180 Subpart C)

Bid Protest

The District maintains the following protest procedures to handle and resolve disputes relating to procurements and, in all instances, discloses information regarding the protest to the ~~awarding~~ agency.

A bidder who wishes to file a bid protest shall file such notice and follow procedures prescribed by the Request For Proposals (RFPs) or the individual bid specifications package for resolution. Bid protests shall be filed, in writing, with the Superintendent within seventy-two (72) hours of the opening of the bids in protest.

Within five (5) days of receipt of a protest, the Superintendent shall review the protest as submitted and render a decision regarding the merits of the protest and any impact on the acceptance and rejection of bids submitted. Notice of the filing of a bid protest shall be communicated to the Board and shall be so noted in any subsequent recommendation for the acceptance of bids and awarding of contracts.

Failure to file a notice of intent to protest, or failure to file a formal written protest within the time prescribed, shall constitute a waiver of proceedings.

Maintenance of Procurement Records

The District shall maintain records sufficient to detail the history of all procurements. These records will include, but are not necessarily limited to, the following: rationale for the method of procurement, selection of contract type, contractor selection or rejection, and the basis for the contract price (including a cost or price analysis).

Records Retention

~~The District must retain all Federal award records for three (3) years from the date of submission of the final financial report. For awards that are renewed quarterly or annually, the District must retain records for three (3) years from the date of submission of the quarterly or annual financial report, respectively. Records to be retained include, but are not limited to, financial records, supporting documentation, and statistical records. Other records retention requirements shall be in accordance with 2 C.F.R. 200.334.~~

~~The District must collect, transmit, and store Federal award information in an open file, non-licensed, and machine-readable formats. The District may substitute electronic versions of original paper records through duplication or other forms of electronic conversion, provided that the procedures are subject to periodic quality control reviews. Quality control reviews must ensure that electronic conversion procedures provide safeguards against the alteration of records and assurance that records remain in a format that is readable by a computer system.~~

2 C.F.R. 200.317-.326; Appendix II to Part 200
2 C.F.R. 200.334 - 200.336
2 C.F.R. 200.520

[Cross Reference: po6350]

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Legal References

2 C.F.R. 200.317-.326; Appendix II to Part 200

2 C.F.R. 200.334 - 200.336

2 C.F.R. 200.520

Cross References

po6350 - PREVAILING WAGE

Classification	Topic	Revised
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DRAFT

Book: Policies for ISD Update

Section: Vol. 39, No. 1 - EDGAR UGG - September 2024 ISD

Title: Vol. 39, No. 1 - EDGAR UGG - September 2024 Revised TRAVEL PAYMENT & REIMBURSEMENT

Code: po6550

Status: Active

Revised Policy - Vol. 39, No. 1 - EDGAR/UGG Revisions

~~[DRAFTING NOTE: Travel charges must be consistent with the District's established written policies. The District must allow costs for "above and beyond regular dependent care" if consistent with established written policy for all travel.]~~

6550 - TRAVEL PAYMENT & REIMBURSEMENT

Travel expenses incurred for official business travel on behalf of the Board of Education shall be limited to those expenses reasonably and necessarily incurred by the employee in the performance of a public purpose authorized, in advance, in accordance with administrative guidelines. Travel costs may include the transportation, lodging, subsistence, and related items incurred by employees who are in travel status on official business of the District.

Payment and reimbursement rates for per diem meals, lodging, and mileage shall be approved by the Board annually. The Board shall establish mileage rates ~~-(X)~~ in accordance with ~~(-)~~ not exceeding **[END-OF OPTION]** the Federal IRS prescribed mileage rate.

Employees are expected to exercise the same care incurring travel expenses that a prudent person would exercise if traveling on personal business and expending personal funds. Unauthorized costs and additional expenses incurred for personal preference or convenience will not be reimbursed.

Unauthorized expenses include but are not limited to alcohol, movies, fines for traffic violations, and the entertainment/meals/lodging of spouses or guests.

[X] Commercial airfare costs in excess of the basic least expensive unrestricted accommodations class offered by commercial airlines are unallowable except when such accommodations would (1) require circuitous routing; (2) require travel during unreasonable hours; (3) excessively prolong travel; (4) result in additional costs that would offset the transportation savings; or (5) offer accommodations not reasonably adequate for the traveler's medical needs. Instances of commercial airfare cost in excess of the basic least expensive unrestricted accommodations class must be justified and documented on a case-by-case basis.

~~**[]** Temporary dependent care costs (as dependent is defined in 26 U.S.C. 152) above and beyond regular dependent care that directly results from travel to conferences are allowable provided that (1) the costs are a direct result of the individual's travel for the Federal award; (2) the costs are consistent with the District's documented administrative guidelines for all entity travel; and (3) are only temporary during the travel period. Travel costs for dependents are unallowable, except for travel of a duration of six (6) months or more with prior approval of the Federal awarding agency. **[DRAFTING NOTE: Choosing this option requires this also to be applicable to all District policies.]**~~

~~**[]** The costs of identifying and providing locally available dependent care resources for conference participants are allowable as needed.~~

[X] Conference costs must be appropriate, necessary, and managed to minimize costs to the Federal award.

~~[DRAFTING NOTE: This draft policy includes the Federal rules for commercial airfare and temporary dependent care costs. Based on State or local laws and policies, Districts may decide that all temporary dependent care costs or commercial airfare costs in excess of the basic least expensive unrestricted accommodations class are unallowable under any circumstance.]~~

Travel payment and reimbursement provided from Federal funds must be authorized in advance and must be reasonable and consistent with the District's travel policy and administrative guidelines. For travel paid for with Federal funds, the travel authorization must include documentation that demonstrates that (1) the participation in the event by the individual traveling is necessary to the Federal award; and (2) the costs are reasonable and consistent with the District's travel policy.

All travel shall comply with the travel procedures and rates established in the administrative guidelines. All costs incurred with Federal funds must meet the cost allowability standards within Board Policy 6114.

To the extent that the District's policy does not establish the allowability of a particular type of travel cost, the rates and amounts established under 5 U.S.C. 5701-11, ("Travel and Subsistence Expenses; Mileage Allowances"), or by the Administrator of General Services, or by the President (or ~~his/her~~their designee), must apply to travel under Federal awards.

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Legal References

2 C.F.R. 200.474

Classification Topic Revised

Book: Policies for ISD Update

Section: Vol. 39, No. 1 - EDGAR UGG - September 2024 ISD

Title: Vol. 39, No. 1 - EDGAR UGG - September 2024 Revised DISPOSITION OF SURPLUS PROPERTY

Code: po7310

Status: Active

Revised Policy - Vol. 39, No. 1 - EDGAR/UGG Revisions

7310 - DISPOSITION OF SURPLUS PROPERTY

The Board of Education requires the Superintendent to review the property of the District periodically and to dispose of that material and equipment which is no longer usable in accordance with the terms of this policy.

A. Instructional Material

The District shall review instructional materials (i.e. textbooks, library books, manuals, support materials, etc.) periodically to determine the relevance of such materials to the present world and current instructional programs. The following criteria will be used to review instructional materials for redistribution and possible disposal:

1. concepts or content that do not support the current goals of the curriculum
2. information that may not be current
3. worn beyond salvage

B. Equipment

For purposes of this policy, equipment shall mean tangible personal property (including information technology systems), a unit of furniture or furnishings, an instrument, a machine, an apparatus, or a set of articles which retains its shape and appearance with use, is nonexpendable, having a useful life of more than one (1) year, and a per-unit cost that equals or exceeds \$10,000. ~~{DRAFTING NOTE: Districts should align the amount provided here to the amount chosen in Board Policy 7450 - Property Inventory} (-) to replace (X) as a single unit {END OF OPTION}~~ and does not lose its identity when incorporated into a more complex unit.

The District shall inspect the equipment used in the instructional program periodically, to determine the condition and usability of such equipment in the current educational program. Should the equipment be deemed no longer serviceable or usable, the following criteria will be used to determine possible disposal:

1. repair parts for the equipment no longer readily available
2. repair records indicate the equipment has no usable life remaining
3. obsolete and no longer contributing to the educational program
4. some potential for sale at a school auction
5. creates a safety or environmental hazard

C. Disposition

The Superintendent is authorized to dispose of obsolete instructional and other property by selling, it to the highest bidder, by donation to appropriate parties, or by proper waste removal in compliance with 2 C.F.R. 200.313(e) and 200.314.

When there is a residual inventory of unused supplies exceeding \$10,000 in aggregate value at the end of the period of performance, and the supplies are not needed for any other Federal award, the District may retain or sell the unused supplies. Unused supplies means supplies that are in new condition, not having been used or opened before. The aggregate value of unused supplies consists of all supply types, not just like-item supplies. The Federal agency or pass-through entity may be entitled to compensation in an amount prescribed in 2 C.F.R. 200.314.

Disposal of surplus property purchased with Federal funds shall be disposed of in accordance with Federal guidelines.

When original or replacement equipment acquired under a Federal award is no longer needed for the original project or program or for other activities currently or previously supported by a Federal ~~awarding~~-agency, the District shall request disposition instructions from the Federal ~~awarding~~-agency if required by the terms and conditions of the Federal award.

Disposition of the equipment will be made in accordance with disposition instructions of the Federal ~~awarding~~-agency.

~~Items of equipment with a current per unit fair market value of \$5,000 or less may be retained, sold or otherwise disposed of with no further obligation to the Federal awarding agency.~~

Except as provided in ~~§200.312~~200.313 Federally-owned and exempt property, paragraph (b), or if the Federal awarding agency fails to provide requested disposition instructions within 120 days, items of equipment with a current ~~per unit~~ fair-market value in excess of ~~\$5,000~~ \$10,000 (per unit) may be retained by the non-Federal entity or sold. The Federal awarding agency is entitled to an amount calculated by multiplying the current market value or proceeds from sale ~~by the Federal awarding agency's percentage of participation in the cost of the original purchase.~~ If the equipment is sold, the Federal ~~awarding~~-agency may permit the non-Federal entity to deduct and retain from the Federal share ~~\$500~~\$1,000 or ten percent (10%) of the proceeds, whichever is less, ~~for its selling and handling expenses~~to cover expenses associated with the selling and handling of the equipment.

The District may transfer title to the property to the Federal Government or to an eligible third party provided that, in such cases, the District shall be entitled to compensation for its attributable percentage of the current fair market value of the property.

When included in the terms and conditions of the Federal award, the Federal agency may permit the District to retain equipment, or authorize MDE to permit the District to retain equipment, with no further obligation to the Federal Government unless prohibited by Federal statute or regulation.

[CROSS REFERENCE: po7450]

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Legal References

2 C.F.R. 200.312, 200.313

Cross References

po7450 - PROPERTY INVENTORY

Classification Topic Revised

Book: Policies for ISD Update
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 Title: Vol. 39, No. 1 - EDGAR UGG - September 2024 Revised PROPERTY INVENTORY
 Code: po7450
 Status: Active

Revised Policy - Vol. 39, No. 1 - EDGAR/UGG Revisions

7450 - PROPERTY INVENTORY

As steward of this District's property, the Board of Education recognizes that efficient management and full replacement upon loss requires accurate inventory and properly maintained property records.

The Board shall

- ~~() conduct a complete inventory~~
- ~~() maintain a continuous inventory~~
- ~~of all District-owned equipment~~
- ~~() and supplies~~
- ~~() annually.~~
- ~~() every _____ years. {specify number; Federal regulations require at least once every two (2) years}~~
- ~~() at such intervals as will coincide with property insurance renewal.~~
- ~~() and Generally Accepted Accounting Principles ("G.A.A.P.") reporting requirements.~~

The Board shall maintain a continuous inventory of all District-owned equipment in accordance with the Generally Accepted Accounting Principles ("G.A.A.P.") reporting requirements.

For purposes of this policy, "equipment" shall mean tangible personal property (including information technology systems), a unit of furniture or furnishings, an instrument, a machine, an apparatus, or a set of articles which retains its shape and appearance with use, is nonexpendable, ~~-costs at least having a useful life of more than one (1) year, and a per-unit cost that equals or exceeds \$10,000~~ [DRAFTING NOTE: See also Policy 7310 - Disposition of Surplus Property to provide for a consistent threshold for such expenditures.]

~~() to replace~~

(X) as a single unit **[END OF OPTION]**

and does not lose its identity when incorporated into a more complex unit. When defining supplies for inventory purposes, no items will be counted whose total value is less than \$ _____. ~~[DRAFTING NOTE: The Federal threshold (2 C.F.R. 200.439) for a supply designation is \$10,0005,000 regardless of length of useful life, however, the District may set an early acquisition cost level for designation as supply. Capital expenditures with a unit cost of \$10,0005,000 or more require prior written approval of the Federal awarding agency or pass-through entity.]~~

It shall be the duty of the ~~() Superintendent () Business Manager~~ **(X) Finance Director [END OF OPTIONS]** to ensure that inventories are recorded systematically and accurately and property records of equipment are updated and adjusted annually by reference to purchase orders and withdrawal reports.

[X] Major items of equipment shall be subject to annual spot check inventory to determine loss, mislocation, or depreciation; any major loss shall be reported to the Board.

~~[] Property records of consumable supplies shall be maintained on a continuous inventory basis.~~

[X] The Finance Director shall maintain a system of property records which shall show, as appropriate to the item recorded, the:

- A. (X) description and identification (serial number or other identification number);
- B. (X) manufacturer;
- C. (X) year of purchase;
- D. (X) initial cost;
- E. (X) location;
- F. (X) condition and depreciation;
- G. ~~() evaluation in conformity with insurance requirements.~~

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The District is responsible for maintaining and updating property records when there is a change in the status of the property.

Equipment acquired in whole or in part under a Federal award will vest upon acquisition to the District, subject to the following conditions:

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- A. The equipment shall be used for the authorized purposes of the award project during the period of performance or until the equipment is no longer needed for the purposes of the project.
- B. ~~The equipment shall not be encumbered without the approval of the Federal awarding agency or the pass-through entity.~~ While the equipment is being used for the originally-authorized purpose, the District (or subrecipient) must not dispose of or encumber its title or other interests without the approval of the Federal agency or pass-through entity.
- C. The equipment may only be used and disposed of in accordance with the provisions of the Federal ~~awarding~~ agency or the pass-through entity and Policy 7300, ~~- Disposition of Real/Personal Property and Policy 7310, - Disposition of Surplus Property (), and AG 7310 - Disposal of District Property.~~
- D. The District must use equipment for the project or program for which it was acquired and for as long as needed, whether or not the project or program continues to be supported by the Federal award. The District must not encumber the equipment without prior approval of the Federal agency or pass-through entity.
- E. When no longer needed for the original project or program, the equipment may be used in other activities in the following order of priority:
 1. Activities under other Federal awards from the Federal agency that funded the original program or project; then
 2. Activities under Federal awards from other Federal agencies. These activities include consolidated equipment for information technology systems.
- F. During the time that equipment is used on the project or program for which it was acquired, the District must also make the equipment available for use on other programs or projects supported by the Federal Government, provided that such use will not interfere with the purpose for which it was originally acquired. First preference for other use of the equipment must be given to other programs or projects supported by the Federal agency that financed the equipment. Second preference must be given to programs or projects under Federal awards from other Federal agencies. Use for non-Federally funded projects is also permissible, provided such use will not interfere with the purpose for which it was originally acquired. The District should consider charging user fees as appropriate. If the District does use equipment to earn program income, it must not charge a fee that is less than a private company would charge for similar services unless specifically authorized by Federal

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statute.

- G. When acquiring replacement equipment, the District may either trade-in or sell the equipment and use the proceeds to offset the cost of the replacement equipment.
- H. Property records shall be maintained that include a description of the equipment, a serial number or other identification number, the source of funding for the equipment (including the Federal Award Identification Number (FAIN), title ~~-entity, acquisition date, cost of the equipment~~holder, acquisition date, cost of the property, percentage of Federal ~~participation in the project costs for the award under which the equipment was acquired~~agency contribution toward the original purchase, the location, use, and condition of the ~~equipment~~property, and ultimate disposition data, including date of disposal and sale price of the ~~equipment~~property.
- I. A physical inventory of the property must be ~~taken~~conducted and results reconciled with property records at least once every two (2) years.
- J. A control system shall be ~~-developed~~in place to provide ~~adequate safeguards to prevent~~ safeguards for preventing loss, damage, or theft of the property. Any such loss, damage, or theft ~~shall be of the property must be~~ investigated. The District must notify the Federal agency or pass-through entity of any loss, damage, or theft of equipment that will have an impact on the program.
- K. ~~Adequate~~Regular maintenance procedures shall be implemented to keep the property in ~~good proper working~~ condition.
- L. Proper sales procedures shall be established to ensure the highest possible return, in the event the District is authorized or required to sell the equipment/property.
- M. When ~~original or replacement~~equipment acquired under a Federal award is no longer needed for the original project/program or for activities currently or previously supported by a Federal ~~awarding agency, and except as otherwise provided by Federal statutes, regulations, or Federal awarding agency disposition instructions,~~ the District shall request disposition instructions from the Federal awarding agency or pass-through entity if required by the terms and conditions of the Federal award. Disposition of the equipment shall be made in accordance with the provisions of C.F.R. 200.313.

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[CROSS REFERENCE: po7310]

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Legal References

2 C.F.R. 200.313

Cross References

po7310 - DISPOSITION OF SURPLUS PROPERTY

Classification Topic Revised

Coversheet

Board of Education Conferences

Section:	VII. Other Items of Business
Item:	A. Board of Education Conferences
Purpose:	
Submitted by:	
Related Material:	Board Conference Travel 25-26 Memo.pdf



TO: WISD Board of Education

FROM: Naomi Norman, ^{mm}Superintendent

DATE: August 6, 2025

RE: Board of Education Conference Travel 2025-2026

I am recommending that the Board of Education authorize the reimbursement of Board members incurring expenses while on official duty for business of the Board of Education for additional 2025-26 conferences. The Board of Education made approvals for 2025-26 conference travel at the June 24, 2025, Board meeting, and additional details of conferences for the year are available. I am recommending the following conferences for reimbursement for board members:

National School Board Association (NSBA) – Advocacy & Equity Institute, Marriott Marquis in Washington DC February 1 - February 5, 2026; registration fee (\$990.00); hotel charges (\$359.00 nightly rate plus \$105 resort fee + \$62.84 tax/night), approximate total for 3 nights (\$1,370.53); round trip airline ticket (approx. \$400.00) shuttle to and from airport (\$300.00); meals for 4 days (\$236.00) for an estimated total expenditure per board member of **\$3,296.53**

Michigan Head Start Association – 2025 Fall Assembly, Grand Traverse Resort in Acme, MI September 25 – September 26, 2025; registration fee (\$475.00); hotel charges (\$359.00 nightly rate plus \$41.90 resort fee + \$48.18 tax/night), approximate total for 2 nights (\$528.08); driving mileage (\$350.00); meals for 3 days (\$177.00) for an estimated total expenditure per board member of **\$1,530.08**.