

## Review Standards for CSP Documents

List of Required Documents with Minimum Standards	Additional Information
<p><b>Non-Profit Documentation</b></p> <ul style="list-style-type: none"> <li>___ 1. Articles of Incorporation as a Florida Non-Profit</li> <li>___ 2. Include most current Annual Report and/or Amended and Related Articles filed through <a href="http://www.sunbiz.org">www.sunbiz.org</a></li> <li>___ 3. Include fictitious name detail, if applicable</li> </ul>	
<p><b>Management Organization (MO) Questionnaire</b></p> <ul style="list-style-type: none"> <li>___ 1. All questions have been answered completely with adequate explanation</li> <li>___ 2. Form is signed by board chair or school administrator. This form may <b>not</b> be signed by a MO representative/employee.</li> </ul> <p>If sub-recipient is using or planning on using a MO:</p> <ul style="list-style-type: none"> <li>___ 3. Includes name of MO the school will/has contract with</li> <li>___ 4. Include a copy of the signed contract (must be uploaded prior to release of Implementation funds)</li> <li>___ 5. MO contract may not include provisions that allow the MO to take possession of equipment purchased with CSP or public funds. Regardless of threshold, all furniture, fixtures and equipment (Including computer hardware) must be accountable and reverted back to the school district.</li> </ul>	<p>All sub-recipients must complete this questionnaire, regardless of use of management organization.</p> <p>If sub-recipient is using or planning on using a MO, responses must be substantive and allow FDOE to evaluate the independence of the governing board from the MO.</p>
<p><b>Executed Charter Contract</b></p> <ul style="list-style-type: none"> <li>___ 1. Verify Contract is for sub-recipient school</li> <li>___ 2. Verify in correct District</li> <li>___ 3. Verify school name matches name on CSP grant application. <ul style="list-style-type: none"> <li>o If school name is different, correct name must be confirmed with school, district, and MSID database that the charter contract is for correct CSP applicant.</li> <li>o If school name is different due to fictitious name, fictitious name detail must be provided with non-profit documentation.</li> </ul> </li> <li>___ 4. Contract is signed by both Sponsor and Governing Board <ul style="list-style-type: none"> <li>o May accept Sponsor (District) School Board minutes showing approval of contract. School must submit signed contract once received</li> </ul> </li> </ul>	
<p><b>Signed Lease</b></p> <ul style="list-style-type: none"> <li>___ 1. Includes physical address</li> <li>___ 2. School name matches charter contract</li> <li>___ 3. Address matches MSID database</li> <li>___ 4. If requesting rent for up to 3 months prior to the first day of school, verify lease effective date</li> <li>___ 5. Lease does not include any additional charges for renovations done</li> </ul>	<p>Lease may not include any provision that allows the landlord to take possession of equipment/materials under any circumstance (typically in the Surrender portion of a standard</p>

<p>to the property</p> <p>___ 6. Lease does not include provisions that allow Landlord/Lessor to take possession of any equipment purchased with public funds under any circumstance. Regardless of threshold, all furniture, fixtures and equipment (including computer hardware) must be accountable and reverted back to the school district.</p> <p>___ 7. If sub-recipient purchases or builds school location, mortgage documentation must be provided.</p>	<p>lease). If lease includes this language, sub-recipient must negotiate an amendment or addendum.</p> <p>* See Uniform Guidance § 200.452 Maintenance and repair costs.</p>
<p><b>Co-Location Questionnaire*</b></p> <p>___ 1. Questionnaire must be completed and signed by board chair or school administrator regardless of co-location status.</p> <ul style="list-style-type: none"> <li>○ MSID numbers for sub-recipient school and additional co-located school(s) must be included</li> </ul> <p>___ 2. Answers should be responsive and thorough (simple yes or no is not sufficient)</p> <p>___ 3. Answers should provide clear evidence that all schools are operating and publicizing as separate schools</p> <p>___ 4. Confirm address against MSID database for co-location status</p>	<p>Schools must be clearly separate. Funds, students, and equipment must not be shared between co-located schools.</p> <p>*Section 5202(d)(1) of the ESEA provides that “[a] charter school may not receive...more than one grant for [planning and implementation activities].”</p>
<p><b>Governing Board By-Laws</b></p> <p>___ 1. By-laws must state that a quorum (a majority of the members of the board or committee) is required</p> <p>___ 2. By-laws may not allow for board members to be compensated (except for travel reimbursement)</p>	

## Board Policies

Board policies (sections A- E below) must be school-specific and uploaded into FLCSP.org as one complete document along with evidence of approval by the affiliated Governing Board. Do not copy and paste the requirements and utilize them as a written and adopted policy.

Co-located schools should clearly note the school's name and MSID number or other identifying number for each policy. If the same policy is submitted for multiple schools, board minutes confirming adoption for the subgrantee school must be uploaded with the policy.

*For expedited processing, provide the CSP Grant Specialist the page numbers where each of the items listed below may be located within the policy manual uploaded to FLCSP.org.*

### A. Procurement Policy

Written policy must:

- \_\_\_ 1. Include school procurement policy for purchases under \$10,000 (micro purchases)
- \_\_\_ 2. Require at least three price or rate quotes for purchases of \$10,000 to \$250,000 (simplified acquisition)
- \_\_\_ 3. Require procurement by competitive proposals or solicitations for purchases over \$250,000
- \_\_\_ 4. Require written justification for any sole-source procurements

Charters are not required to comply with a districts own purchasing policies under Section 1002.33(5)(b)1.d., F.S.

See 2 C.F.C. § 200.17 – 200.36, 2 C.F.R. § 200.320 Methods of Procurement for non-Federal entity; 2 C.F.R. §200.67 Micro-purchase; 2 C.F.R. §200.88 simplified acquisition threshold; Office of Management and Budget Memorandum, Implementing Statutory Changes to the Micro-Purchase and the Simplified Acquisition Threshold for Financial Assistance, dated June 20, 2018.

### B. Enrollment/Admissions Policy

- \_\_\_ 1. Lottery is conducted if number of applications exceeds seats available (first come/first serve not permitted)
- \_\_\_ 2. Lottery exceptions are not required, but may include (*so long as the total number of students allowed under this exemption constitutes only a small percentage of the school's total enrollment*):
  - Siblings of enrolled students
  - Children of **founding** board members
  - Children of staff
  - Automatic enrollment of students in the immediate prior grade of an affiliate charter school - **School MUST share the governing board**
- \_\_\_ 3. If school is co-located, policy is specific to school (co-located schools must conduct separate enrollments and lotteries)

Guiding principle is that all students have an equal chance of enrollment. Sub-recipient may not use a first come/first serve process at any time.

Lottery exemptions do not transfer between co-located schools.

Grant recipients should follow the stricter federal lottery guidelines listed to the left. **Schools may choose to utilize state exemptions only after CSP grant cycle is completed.**

All enrollment applications must be retained for a minimum of 7 years from the start of the CSP cohort grant period.

A charter school must recruit in a manner that does not discriminate against students of a particular race, color, national origin (including English language learners), religion, or sex, or against students with disabilities. Demographic information may be requested but responses are voluntary.

<p><b>C. Conflict of Interest Policy</b></p> <p>All CSP sub-grant recipients must provide a conflict of interest policy. The program office will ensure that the policy does not conflict with the following federal regulations:</p> <ul style="list-style-type: none"> <li>___ 1. Prohibits an employee, officer, or agent of the charter school from participating in the selection, award, or administration of any contract supported by Federal funds if: <ul style="list-style-type: none"> <li>○ The decision is likely to benefit that person or his or her immediate family member;</li> <li>○ The person is a public official or has a family or business relationship with the grantee; and</li> <li>○ If a real or apparent conflict of interest exists</li> </ul> </li> <li>___ 2. Prohibits Board members and immediate family members from having any employment or contractual relationship with any business entity doing business with the charter school unless the business is obtained through competitive bidding <ul style="list-style-type: none"> <li>○ Disclosure and recusal by that conflicted individual would apply during Board deliberations on such bids, but a conflicted company would not be prohibited from bidding</li> </ul> </li> <li>___ 3. Prohibits employees, officers and agents of the non-Federal entity from soliciting nor accepting gratuities, favors, or anything of monetary value from contractors or parties to subcontracts. <ul style="list-style-type: none"> <li>○ Standards for situations in which the financial interest is not substantial or the gift is an unsolicited item of nominal value may be set.</li> </ul> </li> </ul>	<p>CSP sub-grant recipients must avoid apparent and actual conflicts of interest when administering CSP funds.</p> <p>See 34 CFR 74.40-48, 75.524-525, and 80.36 (procurements) and Uniform Guidance § 200.318 (c)(1) for further details regarding Conflict of Interest within the General Procurement Standards.</p>
<p><b>D. Segregation of Financial Duties Policy</b></p> <ul style="list-style-type: none"> <li>___ 1. Policy must specify duties by position/person responsible for completing financial tasks.</li> </ul> <p>The program office will verify if the school divides or segregates key duties and responsibilities among different people to reduce the risk of error, misuse, or fraud. This includes separating the responsibilities for authorizing transactions, processing and recording them, reviewing the transactions, and handling any related assets so that no one individual controls all key aspects of a transaction or event.</p>	<p>Sub-recipients must have clear separation of financial duties. For helpful information outlining appropriate segregation of duties go to <a href="#">GAO Standards for Internal Control in the Federal Government</a></p>
<p><b>E. Inventory Control Policy</b></p> <ul style="list-style-type: none"> <li>___ 1. Full inventory of all CSP purchased property will be conducted at a minimum twice yearly</li> <li>___ 2. All CSP inventory must be logged and labelled upon receipt of equipment. Inventory report should include the following fields: <ul style="list-style-type: none"> <li>○ Item number, Item Description, Funding Source, Acquisition Date, cost, location/room#, Condition, and Disposition date</li> </ul> </li> <li>___ 3. All CSP purchased property with 600 object codes must be tagged: <ul style="list-style-type: none"> <li>○ Property of [District/School Name]</li> <li>○ Inventory item ID/serial #</li> <li>○ Purchased with CSP funds</li> </ul> </li> </ul>	<p>Regardless of threshold, all furniture, fixtures and equipment (Including computer hardware) with 600-series object codes must be accountable and reverted back to the school district.</p> <p>See Uniform Guidance § 200.312 Federally-owned and exempt Property and F.A.C. Rules 69I-72.003 Recording of Property, 69I-72.006 Inventory of Property.</p>