

Review Standards for CSP Documents

List of Required Documents with Minimum Standards	Additional Information
<p>Non-Profit Documentation</p> <ul style="list-style-type: none"> • Articles of Incorporation as a Florida Non-Profit • Future budget amendments require grant specialist verification of Officer/Director Detail with most current Annual Report and/or Amended and Related Articles filed through www.sunbiz.org 	
<p>GEPA Plan</p> <ul style="list-style-type: none"> • Admissions, program, school will be made available to all students and families in service area • Outreach plan ensures equitable access to, and participation in, the school in compliance with Section 427 of GEPA • Ability to assist students and families with limited English proficiency 	<p>GEPA plan should be tailored to the school it represents.</p>
<p>Management Organization (MO) Questionnaire</p> <ul style="list-style-type: none"> • Completed (regardless of use of MO) • Includes name of MO the school will/has contract with • All questions have been answered completely with adequate explanation • Form is signed • If MO contract is executed, a copy must be included <ul style="list-style-type: none"> ○ A copy of the signed contract must be uploaded prior to release of Implementation funds • MO contract must 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. 	<p>All sub-recipients must complete this questionnaire, regardless of MO status.</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>Charter Contract</p> <ul style="list-style-type: none"> • Verify Contract is for Sub-recipient school <ul style="list-style-type: none"> ○ Verify in correct District ○ Verify School Name matches name on CSP grant application. If different, must confirm with school, district, and MSID database that the charter contract is for correct CSP applicant. • Contract is signed by both Sponsor and Governing Board <ul style="list-style-type: none"> ○ May accept Sponsor (District) School Board minutes showing approval of contract ○ School must submit signed contract once received 	

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<p>Signed Lease</p> <ul style="list-style-type: none"> • Includes physical address • Verify the following <ul style="list-style-type: none"> ○ School name matches charter contract OR address is on record with Sponsor (District) ○ Address matches MSID database and flcsp.org (CSP Grant Director verifies complete) • Confirm address against MSID database for co-location status • Confirm lease effective date against budget if requesting funds for up to 3 months' rent within Implementation I budget <ul style="list-style-type: none"> ○ Confirm lease does not include any additional charges for renovations done to the property* • Lease may 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. • If sub-recipient purchases or builds school location, mortgage documentation must be provided 	<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 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>Co-Location Questionnaire*</p> <ul style="list-style-type: none"> • Questionnaire must be completed and signed. <ul style="list-style-type: none"> ○ MSID numbers for sub-recipient school and additional co-located school(s) must be included • Answers should be responsive and thorough (simple yes or no is not sufficient) • Answers should provide clear evidence that all schools are operating and publicizing as separate schools 	<p>Schools must be clearly separate.</p> <p>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>Governing Board By-Laws</p> <ul style="list-style-type: none"> • Quorum is a majority of the members of the board or committee • Board members may not be compensated (except for travel reimbursement) 	

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<p>Procurement Policy**</p> <ul style="list-style-type: none"> • Market analysis must be completed for all <i>aggregated</i> purchases exceeding \$3,000 and for <i>individual</i> purchases exceeding \$1,500, unless using a District approved vendor <ul style="list-style-type: none"> ○ Must maintain documentation (quotes, price comparisons, or analysis, etc.) ○ Written justification for approved vendor must be documented • If using District approved vendor, documentation of approved vendor status must be maintained in file • Formal Bid process required for purchases more than \$100,000* • Written justification for any sole-source procurements 	<p>Note: Charter schools must follow the rules of their representative district as fiscal agent.</p> <p>See Uniform Guidance §200.318, §200.319 and §200.320 for further details of Procurement Policy requirements.</p>
<p>Enrollment/Admissions Policy**</p> <ul style="list-style-type: none"> • Policy is specific to school (co-located schools must conduct separate enrollments and lotteries) • Application periods have or will have established beginning and ending dates <ul style="list-style-type: none"> ○ Registration period dates are made public • Subsequent application windows, if necessary, have or will have beginning and ending dates • Lottery conducted if number of applications exceeds seats available • Waiting list must be created through random lottery selection (first come/first serve not permitted) • 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): <ul style="list-style-type: none"> ○ 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 <ul style="list-style-type: none"> ▪ School MUST share the governing board • Weighted lottery permitted only to provide additional opportunities for students seeking to transfer from a failing public school • 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>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.</p> <p>Lottery exemptions do not transfer between co-located schools.</p> <p>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.</p> <p>All enrollment applications must be retained for a minimum of 7 years from the start of the CSP cohort grant period.</p>
<p>Conflict of Interest Policy**</p> <ul style="list-style-type: none"> • Board members, and their spouse and children, prohibited from being officer, partner, director, proprietor, or owner of a material interest on any business entity that is doing business with the school. • Board members prohibited from having any employment or contractual relationship with any business entity doing business with the school that would pose a recurring or significant conflict between private interests and public duties. • Allowable exceptions to 2 restrictions above: 	<p>*The first three exceptions to the left are often found in the school's Procurement Policy. If this is the case, the school may choose to simply reference the Procurement Policy in the Conflict of Interest Policy.</p>

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<ul style="list-style-type: none"> ○ Business is obtained through competitive bidding process* ○ Business is only source of supply* ○ Total amount of funds that changes hands in any calendar year is \$500 or less* ○ Board member is stockholder, officer, or director of bank that is used by school and school did not favor bank solely because of that board member ● If Board member meets one of the exceptions, he/she must abstain from any discussion/vote on that matter and must disclose interest in writing ● School employee or spouse may not serve on board ● Management company employee or spouse may not serve on board 	<p>See Uniform Guidance §200.112 and § 200.318 for further details regarding Conflict of Interest within the General Procurement Standards.</p>
<p>Segregation of Financial Duties Policy**</p> <ul style="list-style-type: none"> ● Specifies duties by position/person responsible for completing financial tasks ● 2 or more people involved in cash receipts/deposits ● 2 or more persons required for the approval of CSP purchases more than \$1,500. ● Check Signers do not maintain the ledger ● Person who reconciles bank accounts cannot be an authorized check signer 	<p>For helpful information outlining appropriate segregation of duties go to GAO Standards for Internal Control in the Federal Government</p>
<p>Inventory Control Policy**</p> <ul style="list-style-type: none"> ● All CSP purchased property with 600 object codes must be tagged <ul style="list-style-type: none"> ○ Property of [District/School Name] ○ Inventory item ID/serial # ○ Purchased with CSP funds ● Inventory must be logged and labelled upon receipt of equipment <ul style="list-style-type: none"> ○ Inventory report should include the following fields: Item number, Item Description, Funding Source, Acquisition Date, cost, location/room#, Condition, and Disposition date ● Full inventory will be conducted at a minimum twice yearly 	<p>The threshold to determine Capitalized vs. Non-capitalized expenditures depends on the district’s local policies.</p> <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>

****Board approved Policies and Procedures Manual inclusive of: Procurement Policy, Enrollment/Admissions Policy, Conflict of Interest Policy, Inventory Control Policy, and Segregation of Financial Duties must be uploaded into FLCSP.org as one complete document.**

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