



**FLORIDA SCHOLARSHIP FUNDING ORGANIZATION (SFO)
APPLICATION**

2026-2027

Sunshine State Kids Foundation, Inc.

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1. FINANCIAL PLAN

On behalf of Sunshine State Kids Foundation, Inc., in partnership with Odyssey, we are submitting the enclosed multi-year budget to support our Scholarship Funding Organization (SFO) application.

This budget reflects a conservative, scalable financial plan designed to ensure strong stewardship of public funds, uninterrupted scholarship administration, and full compliance with all statutory and operational requirements. The budget aligns directly with the program design, organizational structure, and implementation approach outlined in our application.

Budget Structure and Assumptions. The financial plan spans three fiscal years and is built around a phased growth model. Year One reflects a controlled launch period, allowing the organization to establish strong operational foundations and high-quality service delivery before expanding capacity in subsequent years. While we feel confident that we will be able to seamlessly serve all Jewish students in Florida, we understand that based on timing constraints, it may be challenging to onboard the full amount of potential students in the first year. Years Two and Three scale responsibly to support increased scholarship volume while maintaining predictable costs and operational stability.

Scholarship distribution projections are based on anticipated student participation and statutorily defined award amounts. Administrative and operating costs are intentionally modest relative to total scholarship dollars distributed, ensuring that the overwhelming majority of funds are directed to students and families.

Staffing and Program Operations. Personnel expenses support a lean internal leadership structure focused on governance, financial controls, compliance, and family and school support. These roles are essential to meeting SFO statutory obligations, including audit readiness, fraud prevention, eligibility oversight, and stakeholder engagement. Staffing levels remain flat across the three-year period, reflecting a disciplined approach that relies on technology-enabled scale rather than staffing growth. We have existing donors that are committed to making this program succeed, as well as existing relationships with schools that will seamlessly onboard onto our new SFO.

Technology and Systems. Technology, cybersecurity, and IT costs reflect the contracted services provided by Odyssey, which include eligibility determination, application processing, fund administration, payment processing, ecommerce marketplace, reporting, and implementation support. These costs scale in proportion to program growth and are designed to reduce long-term administrative burden, improve accuracy, and ensure secure handling of sensitive student and family data. This approach eliminates the need for additional state staffing to support day-to-day operations. Odyssey is a seasoned provider that has ample experience managing these processes in several scholarship programs across the country.

Operating Expenses and Controls. Operating expenses include fundraising, professional services, insurance, compliance, training, and administrative infrastructure necessary to support

a statewide program. All expenses are governed by board oversight, segregation of duties, and internal controls to ensure transparency and fiscal accountability. No application or transaction fees are charged to families.

Financial Sustainability. The budget reflects a diversified and stable funding model. Core operating costs are supported by secured philanthropic commitments during the initial years, supplemented by authorized administrative funding as the program becomes operational. This structure ensures continuity of service regardless of enrollment timing or funding cycles and protects against operational disruption.

We appreciate the opportunity to submit this budget and welcome any questions or requests for clarification. Sunshine State Kids Foundation, Inc. is committed to operating as a responsible steward of public resources and to delivering timely, compliant, and family-centered scholarship administration for Florida students.

FLORIDA SCHOLARSHIP FUNDING ORGANIZATION (SFO)
Financial Plan - 3 Year

	2026-2027 Year 1	2027-2028 Year 2	2028-2029 Year 3	3 Year Total
Scholarship Assumptions:				
Children per Year	5,000	10,000	10,200	
Scholarship Grants	8,500	8,670	8,840	
Total Scholarships Distributed:	42,500,000	86,700,000	90,168,000	219,368,000
Income:				
State Funds	39,500,000	81,700,000	80,168,000	201,368,000
Fundraising - Corporate Tax Credits	3,000,000	5,000,000	10,000,000	18,000,000
Donations - Board Commitments	1,000,000	1,663,000	1,735,020	4,398,020
Donations - Community Fundraising	1,000,000	1,663,000	1,735,020	4,398,020
	44,500,000	90,026,000	93,638,040	228,164,040
Expenses:				
Salaries - Program Services:				
Executive Director - CEO	150,000	150,000	150,000	450,000
Chief Financial Officer - CFO	120,000	120,000	120,000	360,000
Chief Compliance Officer - CCO	90,000	90,000	90,000	270,000
Director of Scholarship Operations	75,000	75,000	75,000	225,000
Director of Family & School Support	75,000	75,000	75,000	225,000
Total Salaries	510,000	510,000	510,000	1,530,000
Operating Expenses:				
Fundraising and Marketing Expenses	150,000	150,000	150,000	450,000
Office Manager	8,500	8,500	12,500	29,500
Recruitment	10,000	10,000	10,000	30,000
Accounting	10,000	10,000	10,000	30,000
Legal	15,000	15,000	15,000	45,000
Travel	10,000	10,000	10,000	30,000
Rent	-	-	25,000	25,000
Utilities	-	-	5,000	5,000
Training Materials and Supplies	6,500	6,500	10,000	23,000
Insurance, Bank Charges, Fees & Interest	5,000	5,000	7,500	17,500
Total Operating Expenses	215,000	215,000	255,000	685,000
Total Expenses (Salaries, OpEx)	725,000	725,000	765,000	2,215,000
Tech License, Cybersecurity and IT Fees	1,275,000	2,601,000	2,705,040	6,581,040
Total Expenses (Salaries, OpEx, Tech Fees)	2,000,000	3,326,000	3,470,040	8,796,040
Net Revenue Less Expenses and Scholarships	-	-	-	-

2. GEOGRAPHIC REGION AND DEMAND ANALYSIS

The organization intends to serve eligible students throughout the State of Florida. All services will be available statewide. Initial outreach will focus on religious and faith-based educational communities that have expressed substantial interest in receiving greater support with scholarship access. Many of these schools operate with limited administrative capacity. They often rely on small office teams or volunteers, which creates challenges in navigating the complexity of scholarship applications, compliance requirements, and family guidance. Families in these communities frequently require assistance with documentation, technology access, and understanding program rules. These conditions contribute to a documented need for additional support structures that can ensure timely, accurate, and equitable participation.

There is also a broader statewide need related to processing times and responsiveness. As the primary provider has grown to serve a very large share of eligible students, the volume of applications and inquiries has increased significantly. Schools and families consistently report extended response times, delays in document review, and difficulty obtaining individualized guidance during peak periods. These challenges are natural for any large-scale organization. They highlight the importance of additional SGOs that can contribute operational capacity and provide more direct engagement with school communities.

The introduction of a second provider supports the same principle found in many sectors. Multiple organizations offering similar services encourage improved responsiveness, innovation, and service quality across the entire system. A diversified SGO landscape helps ensure that eligible families receive timely assistance, schools have access to knowledgeable support, and scholarship programs operate with greater efficiency.

As operational capacity grows, the organization will expand its outreach to include all private schools and eligible families across the state. The objective is to strengthen Florida's scholarship infrastructure by increasing access, improving service delivery, and ensuring that every eligible student can participate fully in available programs.

Operational Note: Sunshine State Kids Foundation, Inc. leverages a "mobile-first" platform specifically designed to bridge the digital divide. In similar markets, **84% of applications on this platform are submitted via mobile devices**, ensuring equitable access for families in rural Florida counties where broadband access may be limited. The application is designed to be completed for an entire family in **under five minutes** from any device.

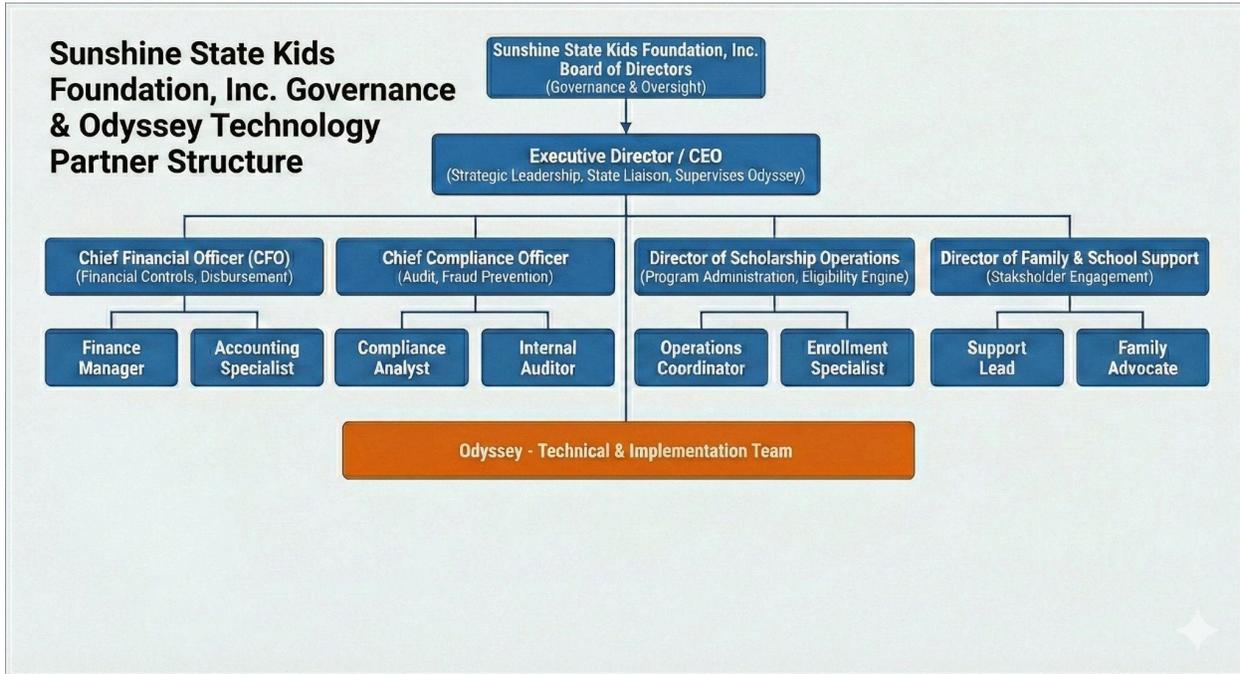
3. ORGANIZATIONAL CHART & MANAGEMENT STRUCTURE

Sunshine State Kids Foundation, Inc. maintains a clear separation of duties between organizational governance and technical execution. The internal team is structured to ensure strict regulatory compliance and financial oversight, while the contracted technology partner

manages the digital infrastructure.

A. Organizational Chart

The following chart illustrates the governance structure of Sunshine State Kids Foundation, Inc. and the supervisory relationship with Odyssey, the contracted technology partner.



B. Sunshine State Kids Foundation, Inc. Internal Leadership (SFO Roles & Responsibilities)

To maintain operational integrity and prevent conflicts of interest, Sunshine State Kids Foundation, Inc. utilizes the following role-based structure. These positions are responsible for policy decisions, audit compliance, and financial authorization.

Board of Directors

- **Role:** Governance & Oversight
- **Responsibilities:** Sets strategic goals, approves annual budgets, ensures the organization acts in accordance with its bylaws and mission, and oversees the performance of the Executive Director.

Executive Director / CEO

- **Role:** Strategic Leadership & State Liaison
- **Responsibilities:** Serves as the primary point of contact with the Florida Department of Education. responsible for the overall execution of the scholarship program, ensuring that SFO operations align with legislative requirements and organizational goals. **Explicitly responsible for the supervision and contract management of the technology partner**

(Odyssey).

Chief Financial Officer (CFO)

- **Role:** Financial Controls & Disbursement
- **Responsibilities:** Manages the segregation of operating funds from scholarship funds. Oversees internal and external financial audits, approves fund disbursement protocols, and monitors the solvency of the organization.

Chief Compliance Officer

- **Role:** Audit & Fraud Prevention
- **Responsibilities:** Enforces anti-fraud protocols, manages Conflict of Interest and Whistleblower policies, and conducts internal spot-checks of eligibility determinations. Responsible for reporting any irregularities to the Board and State.

Director of Scholarship Operations

- **Role:** Program Administration
- **Responsibilities:** Manages the daily workflow of the scholarship program. Liaison to the technical partner to ensure the "Eligibility Engine" is configured correctly. Oversees school eligibility verification and compliance with enrollment reporting.

Director of Family & School Support

- **Role:** Stakeholder Engagement
- **Responsibilities:** Leads the customer support strategy. Manages escalations for complex family applications and ensures schools are properly trained on the administrative portal.

C. Contracted Technical & Implementation Team (Provided by Odyssey)

Sunshine State Kids Foundation, Inc. has secured a partnership with Odyssey to provide the technical backbone for the program. The following key roles are assigned to the Florida implementation to ensure military-grade security and scalability.

Odyssey is the only tech provider in the country that offers a fully integrated and automated ESA administration platform that manages the full lifecycle of an ESA program, from application processing to payment processing to customer support. Their software is built specifically for state educational programs and is designed to automate complex workflows, reduce administrative costs, and improve access for families and schools.

Odyssey's team will be responsible for leading the technical implementation and deployment of software for purposes of scholarship eligibility determination, award granting, and fund processing. Their best-in-class technical team will ensure that system functionality, scalability, and security is consistently maintained at the highest standard.

The Odyssey team is best-in-class with experienced ESA implementers.



Their implementation team is led by **Mike Platek** who has 16 years of experience delivering complex software solutions across the government, including in the defense, finance, and education sectors. A graduate of West Point with a major in Computer Science with Honors and a Bronze Star recipient, Mike previously served as an Army Infantry Officer in Iraq, where he commanded a 187 person team. Mike has previously led technical deployments for agencies such as the U.S. Department of Defense, Department of Justice, and Securities and Exchange Commission. Mike also has extensive experience in risk analysis and remediation from his time as an auditor for Goldman Sachs. At Odyssey, Mike has led successful school choice program launches in more than six states, including Iowa, Georgia, Louisiana, Wyoming, and Utah - and is currently leading the implementation for the Texas Education Freedom Account program. Mike is directly supported by a high-performing implementation team that brings precision, adaptability, and hands-on experience executing ESA program launches across multiple states. **Andrew Shoman**, Senior Implementation Manager, brings over a decade of experience managing high-stakes technical deployments and system implementations. A West Point graduate and former U.S. Army Captain, Andrew's disciplined approach will provide Florida with seamless and on-time delivery of ESA program milestones. **Devon Dekowski**, Implementation Manager, is a U.S. Army veteran and former Booz Allen consultant who has managed software rollouts for federal agencies and currently oversees implementations for Utah school choice programs at Odyssey. **Andrea Seda Segarra** and **Sofia Halverson**, both Implementation Associates, bring deep experience coordinating application reviews, system testing, and bilingual stakeholder support. Together, they have supported the successful rollout of ESA programs in Georgia, Louisiana, Wyoming, Utah, and Iowa, ensuring on-time delivery, smooth go-lives, and operational readiness for hundreds of thousands of families, providers, and vendors.

Their implementation team is underpinned by a deep bench of technical and operational leaders with experience at some of the most respected financial and financial technology companies in the world. **Sam Ratcliffe**, Odyssey's Chief Technology Officer, spent nearly a decade at Stash, where he led engineering for a platform serving over 4 million users and managing more than

\$3 billion in deposits. He oversees all strategic technology aspects of Odyssey's ESA platform, including integrations, security, and scalability. **Cheryl Wu**, Head of Product, brings 20 years of experience in product leadership at Visa, Wells Fargo, and Marqeta. She has led teams developing financial platforms, infrastructure, digital banking tools, and payment processing for hundreds of millions of users across highly regulated environments. **Geoff Buesing**, Odyssey's Head of Engineering, previously served as Principal Software Engineer at Stitch Fix, where he scaled core e-commerce and supply chain systems for nearly 3.5 million users. Geoff oversees all engineering execution and platform delivery. **Ayush Chakravarthy**, Product Manager, brings over a decade of civic tech and public-sector experience, including work on digital services for the U.S. Department of Veterans Affairs and Library of Congress, and will ensure the platform reflects the needs of families, schools, and administrators across Florida. Together, Sam, Cheryl, Geoff, and Ayush will ensure the Florida ESA platform is secure, intuitive, and built to handle scale from day one.

Rounding out their team are experts in stakeholder engagement, policy, and family support who bring deep experience from both the public and private sectors. **Lauren Bender**, Head of Strategy & Growth, has worked in communications and strategy for Apollo Global Management, where she advised C-suite executives on messaging, crisis response, and public-private partnerships, including projects like professional sports team bids and stadium developments. At Odyssey, she has overseen marketplace growth across six states and secured strategic partnerships with national retailers like Amazon to expand access for families. Odyssey's marketplace and financial teams are led by individuals with more than 68 years of combined experience in finance, compliance, vendor operations, and fulfillment, ensuring the Florida ESA Program runs with precision and accountability. **Jon Freed**, Chief Financial Officer, brings 15 years of financial leadership experience, including senior roles at Rothschild & Co. (\$78 billion AUM) and Beyond Better Foods, where he advised on over \$8 billion in transactions. At Odyssey, Jon oversees daily financial operations, disbursements, audits, and reporting for multiple state programs, having successfully processed over \$300 million in compliant funding across school choice programs. **Paul Hopwood**, Supply Chain and Fulfillment Manager, brings an unmatched 38 years of experience leading logistics and inventory operations for companies such as BARK, Feather, and CoEdition. At Odyssey, he manages multi-state fulfillment, third party logistics ("3PL") relationships, and warehouse operations to ensure timely, compliant product delivery to families. Together, this team ensures that funds are safeguarded, providers and vendors are properly vetted, and families receive the goods and services they need without delay.

Additional key team members for the Florida ESA team include Joseph Connor (Founder and CEO), Kaitlyn Rogers (Implementation Operations Lead), Ross Pila (Marketplace Operations Manager), Jelad Salik (Quality Assurance Engineer), Ryan Brink (Senior Software Engineer), Jeremy Dennen (Senior Software Engineer), Brigette Sklar (Product Designer), and Robert Torres (Finance and Operations Analyst). Each team member brings specialized skills and deep experience to support the successful launch, ongoing operation, and continuous improvement of the Florida ESA Program.

4. CRITERIA AND METHODOLOGY FOR EVALUATING SCHOLARSHIP ELIGIBILITY

Sunshine State Kids Foundation, Inc. will leverage Odyssey's proprietary software as the cornerstone of their joint partnership.

Odyssey leverages a "Hybrid Verification Model" that combines strict adherence to state policy with intelligent automation. This section outlines the specific eligibility rules parents must meet (Policy) and the technical method used to confirm them (Methodology).

A. Eligibility Policy Framework

In accordance with Florida statutes and program guidelines, Sunshine State Kids Foundation, Inc. in partnership with Odyssey will evaluate all applicants against the following policy criteria:

1. Student Eligibility Requirements:

- **Residency:** The student must be a resident of Florida or a dependent child of an active-duty member of the United States Armed Forces with Permanent Change of Station (PCS) orders to Florida.
- **Age:** A student entering kindergarten must be five (5) years old on or before September 1st of the school year. First-time applicants aged 5 or 6 must provide a birth certificate or passport to confirm age.
- **Public School Eligibility:** The student must be eligible to enroll in grades K-12 in a Florida public school.

2. Public School Enrollment Prohibition:

- A student cannot be enrolled in a public school full-time while receiving scholarship funds.
- Parents must agree to withdraw their student from public school to access FES/FTC funds. The system checks against DOE records to ensure no cross-enrollment.

3. Award Prioritization Policy:

Applications are processed on a first-come, first-served basis, but awards are distributed based on the following statutory priority tiers:

- **Priority 1:** Renewal students (those who utilized funding in the previous school year).
- **Priority 2:** Household income up to 185% of the Federal Poverty Level (FPL) or students in foster/out-of-home care.
- **Priority 3:** Household income between 185% and up to 400% FPL.
- **Priority 4:** Household income greater than 400% FPL.

4. Household Definition:

To determine accurate prioritization, parents must list all household members. This includes any person residing at the same address. Income documentation is required for all members 18 years or older who share expenses/income.

B. Methodology: The Eligibility Engine

Odyssey determines applicant eligibility with their proven automated Eligibility Engine, a configurable rules-based system designed to verify complex eligibility requirements and priorities with speed, precision, and full fidelity to state law. For Florida, they will tailor the Eligibility Engine to fully align with all verification and prioritization criteria for a given scholarship program, ensuring that each applicant is reviewed quickly and accurately, ingesting data from the student application, external APIs, and automated document uploads that enable real-time identity verification and eligibility determinations within seconds. They will tailor their Eligibility Engine to meet the criteria of both the FES-OS scholarship and the UA scholarship criteria.

At the core of their platform is a hybrid model – at scale, this hybrid model can review 95% of standard applications automatically using intelligent automation, while pairing with expert reviewers for the remaining 5%. This approach has enabled Odyssey to successfully and accurately verify eligibility for hundreds of thousands of students, even in states with highly detailed and complex statutory requirements.

As the Florida program is universal, they will not need to check for income criteria, though they are able to do this, if needed. They typically verify this, in addition to various other criteria, via Application Programming Interface (API). If an API integration fails for a specific parent, Odyssey’s system will dynamically switch to a document upload/OCR methodology. Odyssey’s system uses software to authenticate the document, ensure the document submitted clearly references the applicant, and extract the household income. If the necessary information cannot be extracted, the Eligibility Engine will place the student into an “Under Review” category for a member of our support team to visually verify the student’s documents and information.

Combination of Automated and Manual Review. Odyssey recognizes that while technical automation is the key to processing applications at scale, there is still a need for humans to review. While their automated Eligibility Engine and Priority Engine successfully verify 95% of our applicants, approximately 5% of applications are flagged for manual review. A manual document review becomes necessary either because external data sources and document-matching systems cannot confirm eligibility, or because the applicant has reached the maximum number (3) of submission attempts, an intentional safeguard.

In those cases, the Odyssey platform seamlessly transitions the application to Odyssey’s internal manual verification team. Any documents the applicant has already submitted are securely transferred for review. If additional information is needed, the family is promptly notified with clear instructions on what to submit.

Odyssey’s in-house team consists of full-time, U.S.-based professionals who are highly trained in evaluating residency, income, and citizenship documentation. These reviewers have supported ESA programs in six states and apply consistent standards in accordance with each state’s rules. For Florida, they will be trained specifically on FES and UA policies and documentation protocols to ensure accuracy and compliance.

As the only ESA administrator that has consistently implemented API-based verification systems, Odyssey brings extensive experience standing up secure, production-ready integrations with government partners, often in a matter of weeks.

Specific Verification Criteria:

- **Residency:** Verified via API integration or OCR (Optical Character Recognition) validation of leases, mortgage statements, or utility bills. The system uses AI to match applicant names to documents.
- **Income (Prioritization):** Extracted directly from tax documents to verify household size and income against Federal Poverty Levels (FPL).
- **Public School Cross-Check:** Integration with DOE data (via API or secure file transfer) to prevent cross-enrollment errors.
- **Citizenship:** Verified via the **USCIS Systematic Alien Verification for Entitlements (SAVE) API** or visual inspection of birth certificates/passports.
- **Disability Status (FES-UA):** Dynamic document collection for IEPs/medical diagnoses,

verified against state statutory lists.

- **Active Duty Military:** Verification of military orders for stationing status by specialized team members with military experience.

To start, their system's integrations will determine proof of Florida residency of participating parents. Odyssey's dynamic application process will collect the necessary documents based on the parent's responses while filling out the application. For the majority of parents, Odyssey's document upload/OCR engine will allow the parent to upload either a lease agreement, mortgage statement, state driver's license, state ID, voter registration certificate, letter from a government agency, or a notarized affidavit of residency. These documents will be validated using their software, including AI, to match the applicant name to the document and ensure the document proves the applicant resides in the state of Florida. Various controls are implemented in this system to prevent fraudulent or expired documents from passing the validation check. If a residency document cannot be verified using AI, then the application is placed in an "Under Review" category to be visually inspected by an Odyssey support team member before making an eligibility decision.

They also can provide proof that the child is a citizen or national of the United States or was lawfully admitted in the United States: Odyssey can utilize the **USCIS Systematic Alien Verification for Entitlements (SAVE) API, or a comparable federal data service, if available, to electronically verify a child's lawful immigration status.** Alternatively, Odyssey can harness the document upload/OCR process to gather the required documentation to prove citizenship or lawful admittance. After submission, Odyssey's Eligibility Engine will match the data from the document with the applicant information and attempt to extract the necessary information to conduct an eligibility decision. If the necessary information cannot be verified, the Eligibility Engine will place the student into an "Under Review" category for an Odyssey support team member to visually verify the student's documents and information.

Specifically for the UA scholarship, they also have ample experience determining disability status and prioritization. Odyssey's dynamic application will be configured to collect proof of disability as necessary based on the applicant's responses. If applicable based on the applicant responses, Odyssey will use its document upload/OCR process to upload and extract the necessary information to validate a disability. Once again, the support team will be notified to visually inspect any disability documents that cannot be verified. Odyssey has experience verifying proof of disability from our other state programs in Louisiana and Nebraska. In Louisiana, our system verified disability by performing a matching process with a state database and in Nebraska, our system individually reviewed and validated each separate submission of proof of disability.

Odyssey's system dynamically reacts to applicant information collected during the process. If the parent indicates they are on active duty, Odyssey will prompt the parent to upload active duty military orders that place the family within the state of Florida. To evaluate the residency criteria for the household, these documents will be reviewed by specialized team members with former military experience who can assess whether the orders indicate a permanent change of duty station or a temporary assignment.

In addition, they are extremely experienced in cross-Verification with Departments of Education to verify whether any students are enrolled in public school. If an API is available, Odyssey will send the necessary student information to DOE via a real-time API and

receive a flag indicating whether or not the student meets the public school criteria. This flag will be automatically incorporated into the Odyssey Eligibility Engine to determine student status alongside other program criteria. Depending on available capabilities, Odyssey can also perform a secure file transfer to send and receive the necessary data regarding the public school criteria. Once the data is transferred, Odyssey will incorporate the results with other student data to update a student's eligibility status as necessary. Odyssey has structured similar integrations in other states to verify public school data.

Odyssey's applicant eligibility solution is built for scale and designed to minimize administrative overhead and reduce costs for our state partners. By automating the majority of determinations and routing only exceptions for manual review, they eliminate the need for state staff to review each application. Every decision is fully logged and auditable, giving the state agency transparency without requiring day-to-day involvement by the staff. This provides families with a seamless experience while ensuring every decision meets the program's standards. With Odyssey's technology backing SFO operations, you will gain a scalable, high integrity eligibility engine that lifts the operational burden while maintaining full control.

In cases where any prioritization is needed, Odyssey's system allocates awards to eligible applicants starting with the highest-priority group and proceeding to the next only after all higher-priority applicants have been processed. Once all program funds are allocated, Odyssey maintains a protected internal waitlist. This list is automatically updated in real time as space becomes available due to withdrawals or funding reallocations and automatically offers scholarships to students who are selected from the waitlist. The waitlist can be segmented by priority groups as needed.

Importantly, across their operations, no additional staffing is required from the State or nonprofit partners to determine eligibility. With Odyssey, the prioritization process becomes effortless for both the SFO and Florida families. This means fewer bottlenecks, less waiting time, fewer errors, and faster access to information for families. The Odyssey Priority Engine can provide consistency and fairness and inspire trust in the program, all with minimal lift from external teams.

Odyssey is the only provider in the country offering a fully integrated, end-to-end eligibility verification system that is built for ESA programs. **Their system requires zero (0) staffing from the Florida Department of Education.** From residency to citizenship to disability and school enrollment, their platform verifies every requirement automatically, while their in-house team handles 100% of manual reviews, so the state or nonprofit partners never have to.

Unlike ESA programs operating in states like Arizona and Tennessee, Odyssey does not offload the burden of manual document review onto the state. In those programs, state agencies must review and complete application by application identity verification and eligibility decisions with no automated solutions to help. This approach is easier for vendors, but slows down the application process, delays awards and funding, results in a higher error rate than software, and results in large, bloated agency teams.

In contrast, Odyssey's team handles every step of the manual review process and provides quick eligibility determinations, reducing delays for families and eliminating document-level administrative burden. All review decisions and actions are fully logged and auditable through the administrative portal. Their in-house team handles every step, keeping families moving forward and the program running smoothly and on budget.

With Odyssey, the State of Florida gains a partner that not only can meet the full scope of eligibility requirements with a highly automated and labor saving method. Every verification,

from income to citizenship to school enrollment, is handled through a proven combination of real-time automation and in-house review by Odyssey. Odyssey's system saves the Florida Department of Education millions of dollars annually by ensuring all eligibility decisions are conducted by Odyssey in an auditable fashion - and ensuring that no cross-enrollment errors exist. This allows us to provide fast and accurate determinations backed by the only Eligibility Engine in the country built specifically for ESA programs.

D. Eligibility Screening for the Family Empowerment Scholarship for Students with Unique Abilities (FES-UA)

As stated above, they have experience processing applications and prioritizing students for applicants seeking to participate in the Family Empowerment Scholarship for Students with Unique Abilities. Eligibility determinations follow all statutory requirements under s. 1002.394, Florida Statutes.

1. Qualifying Disability Verification

The platform verifies that the student has a documented diagnosis or educational identification that meets Florida's definition of a qualifying disability. Acceptable documentation includes:

- An Individualized Education Plan (IEP) from a Florida school district.
- A medical or psychological diagnosis from a licensed professional.
- Other state-recognized documentation confirming the student meets the criteria outlined in statute.

Uploaded documents are reviewed for validity, completeness, and currency. The system provides real-time alerts if additional verification is required to prevent delays in processing.

5. APPLICATION PROCESS, DEADLINES, AND FEES

A. The Application Workflow

Sunshine State Kids Foundation, Inc., in partnership with Odyssey, will offer a comprehensive, mobile-optimized process designed for accessibility, speed, and strict compliance:

Odyssey delivers the most accessible and efficient ESA application process in the country today. The Odyssey platform is fully developed and purpose-built to ensure prospective ESA parents can quickly and securely submit applications and receive near instant verification and eligibility determinations. On average, ESA applicants using the Odyssey platform complete the five step application process in under five minutes. Once submitted, applications are automatically reviewed by Odyssey's Eligibility Engine, with identity verification and eligibility determinations typically returned in seconds. The platform is designed to be mobile first, enabling over 84% of applicants to complete the application process entirely on their phones, an essential feature in rural areas with limited internet connectivity.

For Florida, Odyssey will deploy their fully developed and production ready application system to support applicant processing for the Florida ESA program. The Odyssey platform offers the following comprehensive suite of features that streamline every step of the application process for Florida families.

1. **Account Creation:** Secure setup with Multi-Factor Authentication (MFA).
2. **Household Profile: Multi-Student Application Support** allows parents to submit a single application for all children in the household, ensuring accurate logic for sibling prioritization.
3. **Identity Proofing:** Real-time ID scanning against third-party databases.
4. **Document Upload:** The system accepts standard file formats and provides **instant feedback** if a document is blurry or invalid, allowing immediate correction.
5. **Attestation & Submission:** Digital signatures on state-mandated agreements.
6. **Eligibility Validation:** Upon submission, applications undergo automated eligibility verification, including Florida residency confirmation, age and grade-level checks, cross-matching against public school enrollment databases, and checks for duplicate scholarship applications through other SGOs. Applications are also prioritized based on state-defined criteria.

Importantly, the Odyssey platform supports fully customizable application configurations. This enables Odyssey to adjust and tailor the application experience to meet the unique needs of both the FES and UA scholarships in the state of Florida. Odyssey has extensive experience customizing applications as each of their six ESA programs have distinct processes ensuring full alignment with their program rules and requirements. Odyssey's platform provides tools for pre-launch testing by the Comptroller, and all customizations are subject to internal quality assurance review before deployment. Once a parent submits an application, authorized parties can securely access application data, view residency and income documentation, and review real-time eligibility decisions.

The screenshot displays the 'Welcome Parent!' dashboard. On the left, there is a navigation menu with 'Dashboard', 'Profile', and 'Log Out'. The main content area shows a form for 'Address Details'. The form includes a 'Preferred Language' dropdown set to 'English', a 'Street Address' field with '307 Mesquite Street', an optional 'Apt, suite, etc.' field, a 'City' field with 'Abbott', a 'State' dropdown set to 'Texas', and a 'ZIP Code' field with '76621'. At the bottom of the form, there are 'Previous' and 'Save & Next' buttons.

Welcome Parent!

 Dashboard

Step 3 of 4: Parent ID Information

Parent ID Information

Enter the Parent or Guardian's ID Information.

How many people reside in your household? *

3

How many people reside in your household?

Parent/Guardian 1 ID Type *

Social Security Number

Parent/Guardian 1 ID *

394-03-4934

Add Spouse Information

Real Time Identity Verification, Eligibility Determination, and Prioritization: Odyssey has developed an Automated Eligibility Engine that delivers real time identity verification and eligibility determination without any human intervention. The Odyssey solution was uniquely designed and built for ESA programs to process complex, multifaceted eligibility criteria, such as household income, residency, prior public school enrollment, special education status, citizenship, and participation in other state-supported services. As part of the application flow, the solution can verify parent and student identity, assess the application data using the Program's eligibility criteria, and issue an eligibility determination. Odyssey's Priority Engine can then prioritize the application for award accordingly. The best part of this technology is that it has been tested at scale in other states and succeeded - most recently it will be leveraged to run the Texas Education Freedom Account program, which will be the single largest ESA launch in the country. In addition:

- For the Iowa ESA program, the Automated Eligibility Engine processed 45,322 applications and verified identity and conducted eligibility determinations for 34,873 students or 76%. In the first 24 hours, it processed 9,503 applications and verified and made determinations for 9,453 students, or 99.5%, with no human intervention.
- For the Louisiana GATOR program, the Automated Eligibility Engine processed 39,197 applications, and verified identity for 28,486 applications, or approximately 73%. In the first 24 hours, it processed 7,191 applications and verified 6,394, or 89%, with no human intervention.

Odyssey is the only experienced ESA administrator that can offer an automated identity, eligibility and priority solution for the Florida ESA program.



Registration

Create your account to get started

First Name *

Last Name *

Email Address *

Create Password *

Must be at least 8 characters and include at least one uppercase letter, lowercase letter, number, and special character (e.g., !, @, #, \$).

Confirm Password *

Re-enter your password to confirm

Create Account

Already have an account? [Sign in](#)

Here is a sample of the login page.

Welcome Bobby!

Please verify your email address to continue using your account

Resend Verification Email

Dashboard

Step 1 of 3: Parent/Guardian 1

Parent/Guardian 1

Please be sure to use the same name as printed on your State ID/Driver's License.

Legal First Name *

Please be sure to use the same name as printed on your State ID/Driver's License.

Bobby

Legal Middle Name

Enter text...

Legal Last Name *

Please be sure to use the same name as printed on your State ID/Driver's License.

David

Email Address *

testflorida@withodyssey.com

Phone Number *

Enter phone number...

Welcome Bobby!

Dashboard

What is the household size you list on your tax return (Yourself, spouse, children, dependents, etc.) *

Enter number...

Are you or another legal guardian of the student currently an active duty military member? *

- Yes
No

Address Details *

Enter current residential address.

Street Address

Start typing an address...

Apt, suite, etc. optional

Apt, suite, etc. (Optional)

City

State

Utah

ZIP Code

12345

What email did you use for the previous program administrator's 2025/2026 Utah Fits All application? This email will be used to verify returning parents and students. *

If you previously submitted an application before May 2025, please provide the email address you used for that application.

Enter email address...

Are you, or another legal guardian of the student(s) included in this application a Utah Fits All provider on the Odyssey marketplace or the owner of a Utah Fits All Approved School? *

- Yes
No

Parent/Guardian 1 ID Type *

Social Security Number

Parent/Guardian 1 ID *

XXX-XX-XXXX

Previous

Save & Next

Account Info

Log Out

Step 2 of 3: Student Information

Student Information

All eligible students within a household may be included in this application. To add additional students, click on the "Add Another Student" button.

Student Information 1

Student's Legal First Name *

Enter text...

Student's Legal Middle Name

Enter text...

Student's Legal Last Name *

Enter text...

Date of Birth *

Month



DD

YYYY

Student Social Security Number *

Enter text...

Identity Document *

Please upload the student's birth certificate, government ID, school ID, or any other document that can be used to verify the student's identity. This document will not be shared with any other entity and will only be used for internal auditing procedures.



Click to upload or drag and drop

Accepted: .PDF, .JPG, .JPEG, .PNG, .HEIC

Max size: 10 MB

Same Address as Parent/Guardian

Please select the grade level in which your child will be enrolled during the Spring 2026 semester. *

Please select the grade level in which your child will be enrolled during the Spring 2026 semester. *

Select an option...

If awarded the scholarship, will you disenroll them from their public school or Local Education Agency (LEA)? *

- Yes
- No
- N/A

If awarded the scholarship, will you forgo using the Statewide Online Education Program (SOEP) for this student, or officially withdraw from SOEP before opting-in and accepting UFA funds? *

- Yes
- No
- N/A

Has the student received funds from the Carson Smith Scholarship or Carson Smith Opportunity Scholarship Program this school year? *

- Yes
- No

Is this student a returning UFA participant? *

- Yes
- No

+ Add Student

< Previous

Save & Next >

Please note that all these fields are completely customizable. You are viewing a demo application for the Utah Fits All scholarship, which is one of their largest ESA programs. Every field here is customizable to fit the program's needs and guidelines. Importantly, they tailor an application form to the specific scholarship type. In Utah, for example, they run two different scholarship programs and could tailor a similar approach for FES and UA needs.

Finally, and importantly, before they ask a parent to submit the application, they are asked that they click through several program and state-specific attestations.

Step 3 of 3: Attestations

Attestations

Please review and acknowledge the following statements by checking each box.

- I affirm that I have full and legal authority to complete this application and request a scholarship for the prospective participating student(s) and to attest to and take all of the actions herein listed.
- I affirm that all information provided in support of the application for participation in the Utah Fits All Scholarship Program is true, correct, and complete and that any negligent or willful misrepresentation made by the applicant may result in ineligibility to participate in the program and subject the applicant to civil and/or criminal penalties provided by law.
- I understand that the State and Odyssey will take action if my information is incorrect or if any improper benefits are awarded to the Utah Fits All Scholarship Program account of any of the students included in my application.
- I acknowledge that I am familiar with and will comply with all Utah statutory and regulatory program requirements.
- I understand this agreement is binding for as long as I participate and each child participates in the program and applies to any information given or benefit received.
- I confirm the student(s) included in this application have not been claimed on another application.
- I hereby certify that I authorize the Utah State Tax Commission to release my Utah individual income tax return information pertaining to the three most recent tax years to Odyssey acting as the program manager of the Utah Fits All Scholarship program. I understand that this information may be used to process my Utah Fits All Scholarship application and for purposes of auditing the Utah Fits All Scholarship program.
- The qualifying provider selected by the parent for the student's enrollment or engagement can provide education services for the student.
- A qualifying provider may not provide the same level of disability services that are provided in a public school;
- Upon agreeing to establish a scholarship account, I agree to assume full financial responsibility for the education of the scholarship student, including the balance of any expense incurred at a qualifying provider or for goods that are not paid for by the scholarship student's scholarship account.
- Agreeing to establish this scholarship account has the same effect as a parental refusal to consent to services as described in 34 C.F.R. Sec. 300.300, issued under the Individuals with Disabilities Education Act, 20 U.S.C. Sec. 1400 et seq.;
- My child's enrollment in this program is not intended to be a withdrawal of consent to services as described in 34 C.F.R. Sec. 300.300, issued under the Individuals with Disabilities Education Act, 20 U.S.C. Sec. 1400 et seq.;

I understand that scholarship funds may not be used to pay a home-based education service provider who is a relative of the participating student.

I understand that scholarship funds may not be used to pay a parent, step-parent, or legal guardian of a participating student to provide educational services.

If this application is for more than one student, I confirm that the participating student is a sibling as defined herein for purposes of obtaining award priority status in the program. A biologically or legally adopted brother or sister residing in the same household, or residing with a child having the same legal guardian.

I, hereby understand and consent to the agreements outlined in this application.

I understand that once this application is submitted, no edits can be made to the information provided. If any changes are needed, my application must be closed, and I will need to start a new one.

I affirm that I have verified and included profiles for all students I am applying for, and I understand that I cannot add additional students after submitting this application.

Full Name *

Enter text...

Parent/Guardian Signature *

By typing my name, I am signing this agreement. Enter your full name (first and last).

Click to sign...

Date *

12/04/2025 

[< Previous](#) [Submit](#)

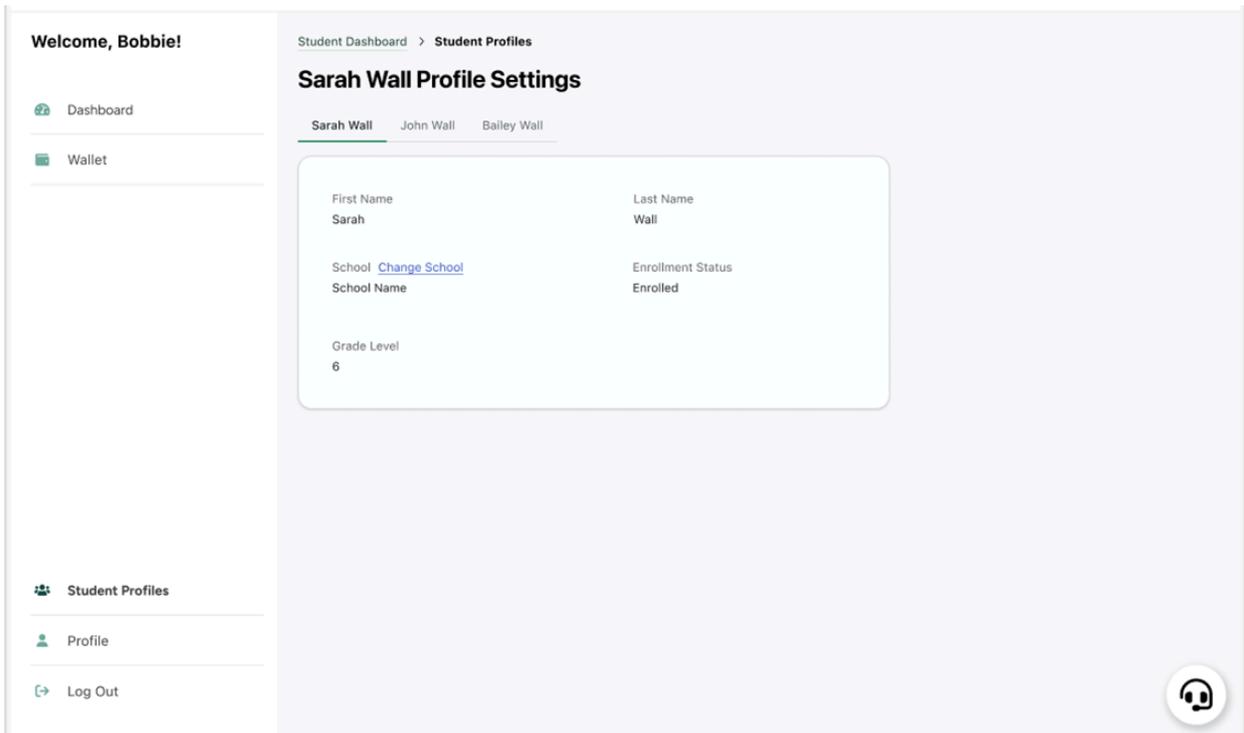
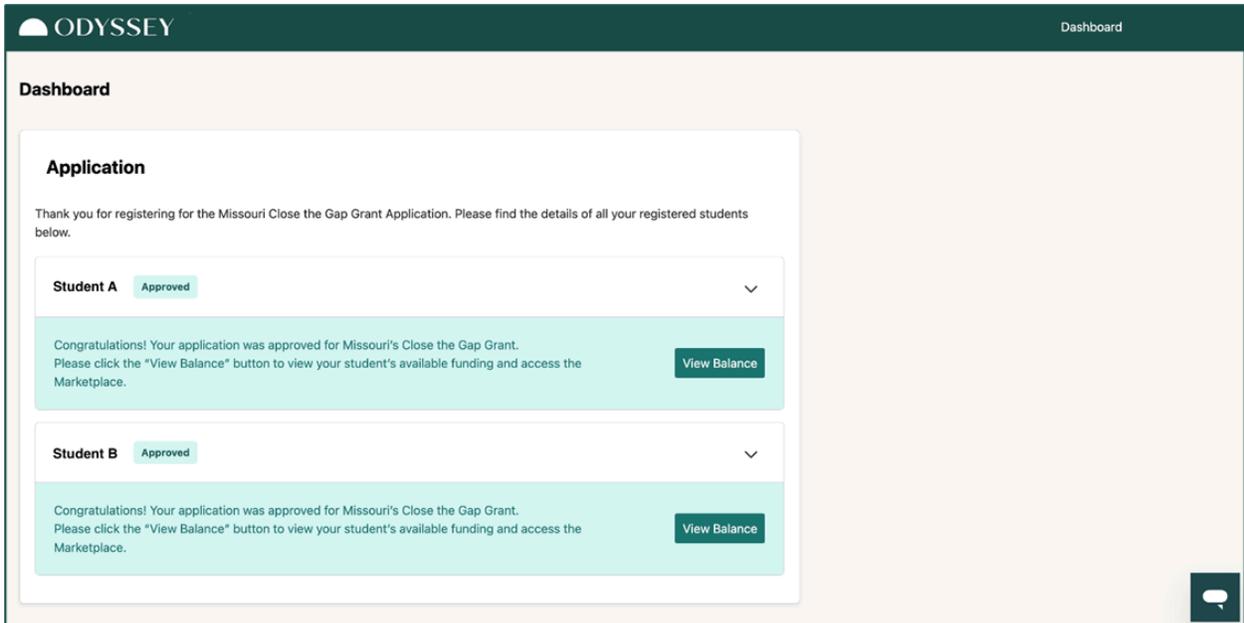
Applicants may pause and resume their application at any time prior to submission.

Importantly, they make sure that every applicant agrees to participate in the scholarship program pursuant to relevant statute, rules, and regulations. Accordingly, they require them to check several attestations that are customized per state. Additionally, they require them to sign an agreement, embedded in the application, that they will comply with program rules.

Real Time Application Tracking: After submission, applicants can track the status of each child's application in a dedicated student dashboard, which displays real time updates. This transparency empowers families to track their application process and reduces customer support requests.

Post-Approval Enrollment Steps:

Following approval, parents must select a participating private school, provide the student's scholarship identifier, and complete the school confirmation process. Schools and parents must both approve tuition and fee amounts within the Odyssey portal to complete enrollment.



B. Verification & Compliance Standards

- **Mandatory Public School Cross-Checks:** Sunshine State Kids Foundation, Inc. in partnership with Odyssey performs mandatory cross-checks with state enrollment data to ensure students are not simultaneously funded as public-school enrollees, consistent with statutory requirements.
- **Document Review SLA:** Submitted documents are reviewed on a rolling basis, with status

updates provided to families within defined processing windows to ensure timely eligibility determinations.

- **Contingent Approval:** All approvals are contingent on continued compliance with statutory requirements. Application approval does not guarantee funding if subsequent verification reveals ineligibility.

C. Security & Data Privacy

- **Security:** In a sector that has suffered from recent data breaches, Odyssey can proudly state that they have never had a data breach in their years of administering programs. Families can confidently trust them to safeguard their personal information thanks to their robust data privacy and cybersecurity standards. Odyssey ensures compliance with several federal and legislative mandates that have significantly shaped the development of our platform to prioritize security, privacy, and data integrity, including FERPA, IDEA, HIPAA, and COPPA compliance and SOC 2 Type 2 certification.
- **Operational Safeguards:** User accounts cannot be shared with schools or service providers. Sunshine State Kids Foundation and Odyssey enforce strict access controls and monitors accounts for unauthorized access patterns.
- **ADA Compliance:** Odyssey is committed to ensure access for all users, including individuals with disabilities. The platform supports key accessibility features such as screen reader compatibility, keyboard navigation, and touch-friendly interfaces. Odyssey has implemented streamlined menus, clear content structure, and mobile-responsive design to promote intuitive navigation across devices. Accessibility is an ongoing priority as they continue to enhance the platform.
- **Testing Functionality:** Odyssey employs a multi-environment testing framework to validate all software components prior to launch. Each deployment undergoes end-to-end testing in a secure staging environment that mirrors production architecture, including simulated integrations with identity verification services, payment processors, and third-party APIs. Their team executes automated and manual test suites covering functional, regression, and performance scenarios, while program-specific business logic and usability are validated through scripted UAT workflows. Error handling, edge cases, and data validation rules are stress-tested to ensure compliance and system stability. All defects are tracked, triaged, and resolved in coordination with product and engineering teams prior to release, ensuring a secure and seamless go-live experience.
- **Mobile Optimized Experience:** The Odyssey application will work optimally on desktop, smartphones, tablets, and laptops and on all major web browsers and operating systems, including Microsoft Edge, Google Chrome, Apple Safari, and Mozilla Firefox, as well as Android and iOS. Odyssey's application automatically adjusts to different screen sizes and resolutions to provide a seamless experience for all families. More than 84% of applications for our state programs are completed on mobile phones, a feature that particularly benefits busy parents on the go and from rural areas across Florida.
- **Built and Tested for High Volume:** Odyssey has successfully administered ten high volume enrollment periods for state agencies and processed over 300,000 applications from start to finish. They have highlighted some of their recent high volume enrollment

periods. In the coming months, they will be managing the Texas ESA application cycle which will process 100,000 student applications for one year.

D. Deadlines (Deadline Driven Enrollment)

- **Smart Windows:** The portal, powered by Odyssey, opens/closes based on Sunshine State Kids Foundation, Inc. enrollment dates.
- **Application Locking:** Once the application deadline passes, all submissions are locked to preserve the integrity of the enrollment cycle. Only families qualifying under state-defined exceptions may submit or modify applications after the deadline.
- **Deadline Exceptions:** Sunshine State Kids Foundation, Inc. accommodates state-defined exception categories that allow certain families to apply outside the standard enrollment windows. These applications follow an expedited processing workflow.
- **Notifications:** Automated alerts sent to parents regarding missing info or upcoming deadlines via in-app alerts and email.
- **Real-Time Tracking:** Parents can track the status of each child's application in a dedicated student dashboard.

E. Fees

- **Application Fee:** Sunshine State Kids Foundation, Inc. does not charge any application or processing fees to families, nor does Odyssey require any transaction fees at any point in the lifecycle of an applicant, from application submission through to marketplace purchase.
- **Platform Efficiency:** The automated system is designed to minimize administrative costs, maximizing funds available for scholarships.

6. DEADLINES FOR ATTENDANCE VERIFICATION AND SCHOLARSHIP PAYMENTS

A. Funding Accounts

Each eligible FES-UA student will receive an individualized Education Savings Account (ESA) administered by Sunshine State Kids Foundation, Inc. in partnership with Odyssey. Fund management will be controlled through the Odyssey portal. The account will be established upon DOE confirmation of eligibility and funded according to the state's quarterly deposit schedule.

- **Individual, Immutable Ledger:** Every account operates on a double-entry ledger that records all deposits, encumbrances, direct payments, reimbursements, and remaining balances.
- **Restricted Use:** Funds may only be used for authorized expenses under s. 1002.394, Florida Statutes. Parents cannot take possession of scholarship dollars at any time.
- **Transparency:** Families can view real-time balances, encumbrances, and transaction histories through the parent dashboard.

- **Rollover Rules:** Unused funds roll over each year in accordance with statutory limits until the student ages out or becomes ineligible.

B. State Disbursement and Distribution Schedule

Sunshine State Kids Foundation, Inc. follows the state-established funding timeline.

- **Quarterly Funding:** Funds are deposited into ESA accounts quarterly following DOE's release schedule, typically: September, November, February, and April.
- **Eligibility Verification Prior to Funding:** Before each quarterly distribution, Sunshine State Kids Foundation, Inc., in partnership with Odyssey, reconfirms:
 - student enrollment status
 - non-participation in public school
 - compliance with all program requirements
- **Funding Release:** Funding is only released after these verifications are completed.

C. Direct Pay to Providers

Sunshine State Kids Foundation, Inc. works with Odyssey to support payment functionality directly to vendors to reduce out-of-pocket burden on families and ensure proper use of funds. We do this primarily through a robust, state-curated e-commerce marketplace that is hosted by Odyssey. In addition to a robust marketplace, we make direct payments to schools via a school portal.

Odyssey's dynamic platform does not begin and end with the parent portal. In addition, they have unique portals for all stakeholders involved in scholarship management. This includes a school portal, a vendor portal for any marketplace providers, and an admin portal that can be accessed by all SFO operators.

Once a parent applies and is deemed eligible, they are able to select a school. Odyssey will work with us to pre-populate a list of schools from which the parent can select. The school then needs to confirm that the child will in fact be attending the school. The school also has the ability to indicate that the student has withdrawn or did not attend said school. Once the school confirms, the parent will be prompted to "opt in" to the program and confirm their attendance status before any payments can be processed.

Once the school confirms the student's enrollment, the school can then set tuition for the school in the portal. Once this happens, the parent will be notified and then the parent will be able to confirm the tuition amount on their end. Once both the parent and the school have approved the tuition amount, the parent - provided that they are in fact approved for funding and have been funded - then the parent can then request to make a payment via their digital wallet.

Odyssey makes payments directly to schools once parents indicate that they would like to make a tuition payment via digital wallet. They can do this at any cadence, but typically recommend that payments be made quarterly, bi-annually, or once a year. If they make payments multiple times a year, they can freeze payment cadences if the student withdraws from the given school.

- **Approved Providers:** Private schools, therapists, specialized service providers, and public-school districts electing to participate may receive payments directly from ESA accounts.
- **ACH Settlement:** All provider payments are made through the ACH network, ensuring

timely settlement and complete transaction documentation.

- **Preventing Overspending:** Once a parent selects where they'd like to allocate their funds, the system automatically "earmarks" those funds in the student's account until settlement occurs, creating an itemized ledger in their individual wallet and preventing overspending.

D. Reimbursement Process

Parents who choose to pay out-of-pocket for eligible expenses may request reimbursement through the ESA portal. However, Odyssey's marketplace makes it easy for any item to be onboarded onto the marketplace so that parents are never in a position where they have to pay out of pocket.

- **Submission Requirements:** Reimbursement requests must include an itemized invoice or receipt, proof of payment, and documentation demonstrating the item or service is statutorily eligible via the Odyssey platform.
- **Real-Time Validation:** Uploaded documents are scanned for completeness, legibility, and eligibility indicators. Parents receive immediate alerts if corrections are needed.
- **Processing Window:** Reimbursements are reviewed on a rolling basis and processed within defined service-level timeframes.
- **Payment Method:** Approved reimbursements are issued via ACH to the parent's designated bank account.

E. Expense Eligibility and Compliance Checks

To ensure proper stewardship of state funds:

- **Automated Flags:** The system automatically identifies and holds purchases that require additional documentation or may be prohibited under statute.
- **Frequency Controls:** Certain categories (e.g., digital devices, PE equipment) enforce purchase-frequency limits as indicated in the purchasing policy.

F. Withdrawal, Transfer, or Ineligibility

If a student withdraws from a participating program, enrolls full-time in public school, or becomes statutorily ineligible, Sunshine State Kids Foundation, Inc. will immediately:

- freeze remaining ESA funds
- reconcile pending payments
- comply with DOE directives for returning or reallocating funds or keep the funds available per statute.

This prevents unauthorized use and ensures compliance with state rules.

G. Oversight and Audit Controls

- **Audit Trails:** Every transaction is logged and permanently recorded.
- **Internal Controls:** Segregation of duties is enforced across approval, payment, and reconciliation processes.
- **DOE Reporting:** Sunshine State Kids Foundation, Inc. provides required financial and programmatic reports to DOE in accordance with rule and statute.

7. PURCHASING POLICIES & AUTHORIZED EXPENSES

Sunshine State Kids Foundation, Inc. has established comprehensive purchasing policies to ensure that all scholarship funds are utilized strictly for authorized educational purposes in accordance with Florida statutes and program rules.

Please refer to the attached "Sunshine State Kids Foundation, Inc. Purchasing Guide" (formerly the FES-UA Purchasing Guide and FTC Parent Handbook) for the complete and detailed policy.

The policy document covers:

- **Authorized Expenses:** Detailed lists of eligible instructional materials, tuition, specialized services, and curriculum.
- **Prohibited Items:** A comprehensive list of ineligible expenses.
- **Pre-Authorization:** Procedures and requirements for obtaining approval for high-value or specialized items.

8. CONFLICT OF INTEREST AND WHISTLEBLOWER POLICIES

A. Conflict of Interest Policy

1. Purpose

The purpose of this Conflict of Interest Policy is to protect Sunshine State Kids Foundation, Inc.'s interest when it is contemplating entering into a transaction or arrangement that might benefit the private interest of an officer, director, or employee of the Organization.

2. Prohibited Interests

Consistent with the requirements for Florida Scholarship Funding Organizations (SFOs), no officer, director, or employee of Sunshine State Kids Foundation, Inc. may have a direct or indirect financial interest in any eligible private school, eligible postsecondary educational institution, private tutoring facility, or other provider/vendor receiving scholarship funds.

3. Definitions

- **Interested Person:** Any director, principal officer, or member of a committee with governing board delegated powers, who has a direct or indirect financial interest.
- **Financial Interest:** A person has a financial interest if the person has, directly or indirectly, through business, investment, or family:
 - An ownership or investment interest in any entity with which the Organization has a transaction or arrangement;
 - A compensation arrangement with the Organization or with any entity or individual with which the Organization has a transaction or arrangement.

4. Duty to Disclose

In connection with any actual or possible conflict of interest, an interested person must disclose the existence of the financial interest and be given the opportunity to disclose all material facts

to the directors and members of committees with governing board delegated powers considering the proposed transaction or arrangement.

5. Violations of the Conflicts of Interest Policy

If the governing board or committee has reasonable cause to believe a member has failed to disclose actual or possible conflicts of interest, it shall inform the member of the basis for such belief and afford the member an opportunity to explain the alleged failure to disclose. If, after hearing the member's response and after making further investigation as warranted by the circumstances, the governing board or committee determines the member has failed to disclose an actual or possible conflict of interest, it shall take appropriate disciplinary and corrective action, up to and including removal from the board or termination of employment.

B. Whistleblower Policy

1. General

Sunshine State Kids Foundation, Inc. requires directors, officers, and employees to observe high standards of business and personal ethics in the conduct of their duties and responsibilities. As employees and representatives of the Organization, we must practice honesty and integrity in fulfilling our responsibilities and comply with all applicable laws and regulations.

2. Reporting Responsibility

It is the responsibility of all directors, officers, and employees to comply with the Code and to report violations or suspected violations in accordance with this Whistleblower Policy.

3. No Retaliation

No director, officer, or employee who in good faith reports a violation of the Code shall suffer harassment, retaliation, or adverse employment consequence. An employee who retaliates against someone who has reported a violation in good faith is subject to discipline up to and including termination of employment. This Whistleblower Policy is intended to encourage and enable employees and others to raise serious concerns within the Organization prior to seeking resolution outside the Organization.

4. Reporting Violations

The Organization has an open door policy and suggests that employees share their questions, concerns, suggestions, or complaints with someone who can address them properly. In most cases, an employee's supervisor is in the best position to address an area of concern. However, if you are not comfortable speaking with your supervisor or you are not satisfied with your supervisor's response, you are encouraged to speak with the Chief Compliance Officer or anyone in management whom you are comfortable in approaching. Supervisors and managers are required to report suspected violations of the Code of Conduct to the Organization's Compliance Officer.

5. Compliance Officer

The Organization's Chief Compliance Officer is responsible for investigating and resolving all reported complaints and allegations concerning violations of the Code and, at his/her discretion, shall advise the Executive Director and/or the audit committee. The Compliance Officer has direct access to the audit committee of the board of directors and is required to report to the audit committee at least annually on compliance activity.

MANDATORY FORMS & CERTIFICATIONS included

IEPC-SFO-1 Form: A fully executed and signed Scholarship Funding Organization Application Form.

IRS Determination Letter: Copy of the 501(c)(3) not-for-profit tax-exempt status determination letter from the Internal Revenue Service.

State Incorporation: Copy of incorporation and active registration with the Florida Division of Corporations (Sunbiz), Office of the Secretary of State.

Surety Bond / Letter of Credit: Proof of surety bond or letter of credit in the amount of [Insert Amount: 25% of anticipated funds or \$100,000, whichever is greater], securely protecting state scholarship funds.

Background Screening: Level 2 criminal background screening results for all owners and operators as required by statute.

A copy of the organization's purchasing handbook (s. 1002.395(6)(t), F.S)

NONPROFIT SCHOLARSHIP-FUNDING ORGANIZATION
PARTICIPATION APPLICATION
FOR NEW SCHOLARSHIP-FUNDING
ORGANIZATION



If your nonprofit charitable organization desires to participate, please complete this form and submit it to the **Department of Education** with information as requested below. If you have any questions, contact the Office of Independent Education and Parental Choice at: Telephone (850) 245-0502 or FAX (850) 245-0875 or by mail to: 325 W. Gaines Street, Suite 1044, Tallahassee, FL 32399-0400.

INFORMATION REQUIRED ABOUT YOUR ORGANIZATION

Sunshine State Kids Foundation, Inc.

(Name of Organization)

Yosef Rosengarten

(Principal Contact)

yossr26@gmail.com

(E-mail)

917-647-9197

(Phone)

(Fax)

5870 Stirling Road

(Mailing Address)

(Mailing Address Cont.)

Hollywood

(City)

33021

(Zip Code)

Yosef Rosengarten

(Name of Principal Officer or Legal Representative)

CHARITABLE SFO ASSURANCES / VERIFICATION

WHICH BEST DESCRIBES YOUR ORGANIZATION? (Circle one)

Municipal (serving one city or county)

Regional

Statewide

WHICH SCHOLARSHIP PROGRAM(S) DOES YOUR ORGANIZATION PLAN TO ADMINISTER?

- Florida Tax Credit Scholarship Program
- Family Empowerment Scholarship
- New Worlds Scholarship Accounts

TO BE CONSIDERED AS AN ELIGIBLE SFO, PLEASE SUBMIT THE FOLLOWING DOCUMENTATION TO THE DEPARTMENT OF EDUCATION:

- A signed IEPC-SFO-1 form.
- A copy of your IRS Determination Letter as a 501(c)(3) not-for-profit organization.
- A copy of your organization's incorporation and registration with the Florida Division of Corporations, Office of the Secretary of State.
- Level 2 criminal background screening results for owners and operators.

- A description of your organization's financial plan that demonstrates sufficient funds to operate throughout the school year.
- A description of the geographic region that the organization intends to serve and an analysis of the demand and unmet need for eligible students in that area.
- The organization's organizational chart.
- A description of the criteria and methodology that the organization will use to evaluate scholarship eligibility.
- A description of the application process, including deadlines and any associated fees.
- A description of the deadlines for attendance verification and scholarship payments.
- A copy of the organization's policies on conflict of interest and whistleblowers.
- A copy of a surety bond or letter of credit in an amount equal to 25 percent of the scholarship funds anticipated for each school year or \$100,000.00, whichever is greater.
- A copy of the organization's purchasing handbook (s. 1002.395(6)(t), F.S).

PLEASE REVIEW THE FOLLOWING DECLARATIONS:

- I have read and agree to comply with Florida Administrative Code 6A-6.0952 related to the Family Empowerment Scholarship Program, 6A-6.0960 related to the Florida Tax Credit Scholarship Program, and 6A-6.0962 related to New Worlds Scholarship Accounts, if applicable.
- I have read and agree to comply with Florida Statutes Sections 1002.394, 1002.395, 1002.411, and 212.099, if applicable.
- I will notify the Department of Education within 7 days if personal or corporate bankruptcy is filed within the next year.
- I have not filed for personal or corporate bankruptcy in a corporation of which I owned more than 20 percent in the last 7 years.

I HEREBY ATTEST THAT AS THE PRINCIPAL OFFICER OF THE ABOVE-NAMED SCHOLARSHIP FUNDING ORGANIZATION ALL OF THE DOCUMENTATION SUBMITTED AND INFORMATION PROVIDED AS A RESULT OF THIS FORM IS TRUE AND CORRECT.

Signed by:


 Signature of Principal Officer

Yosef Rosengarten

 Please print or type signature name

12/19/2025

 Date

NOTARIZATION ENCOURAGED



JUDAH VORCHHEIMER
 NOTARY PUBLIC-STATE OF NEW YORK
 No. 01VO6353384
 Qualified in Rockland County
 My Commission Expires 01-23-2029

FOR DOE PURPOSES ONLY:

Date Received:	_____
Received by:	_____
Action:	_____ _____
Authorization:	_____
	Date: _____
SFO Notified:	_____
DOR Notified:	_____
DABT Notified:	_____

NOTE: Section 1002.395, F.S., requires the Department of Education to annually notify and provide a list of eligible Scholarship Funding Organizations to the Department of Revenue and the Division of Alcoholic Beverages and Tobacco of the Business and Professional Regulation by March 15 for the upcoming fiscal year.



Department of the Treasury
Internal Revenue Service
Tax Exempt and Government Entities
P.O. Box 2508
Cincinnati, OH 45201

SUNSHINE STATE KIDS FOUNDATION INC
5870 STIRLING RD
HOLLYWOOD, FL 33021

Date:
11/21/2025
Employer ID number:
41-2464146
Person to contact:
Name: Mr. Maiden
ID number: 0085956
Telephone: 877-829-5500
Accounting period ending:
December 31
Public charity status:
170(b)(1)(A)(vi)
Form 990 / 990-EZ / 990-N required:
Yes
Effective date of exemption:
November 7, 2025
Contribution deductibility:
Yes
Addendum applies:
No
DLN:
26053717006575

Dear Applicant:

We're pleased to tell you we determined you're exempt from federal income tax under Internal Revenue Code (IRC) Section 501(c)(3). Donors can deduct contributions they make to you under IRC Section 170. You're also qualified to receive tax deductible bequests, devises, transfers or gifts under Section 2055, 2106, or 2522. This letter could help resolve questions on your exempt status. Please keep it for your records.

Organizations exempt under IRC Section 501(c)(3) are further classified as either public charities or private foundations. We determined you're a public charity under the IRC Section listed at the top of this letter.

If we indicated at the top of this letter that you're required to file Form 990/990-EZ/990-N, our records show you're required to file an annual information return (Form 990 or Form 990-EZ) or electronic notice (Form 990-N, the e-Postcard). If you don't file a required return or notice for three consecutive years, your exempt status will be automatically revoked.

If we indicated at the top of this letter that an addendum applies, the enclosed addendum is an integral part of this letter.

Keep a copy of this letter for your records.

We sent a copy of this letter to your representative as indicated in your power of attorney.

Sincerely,

Stephen A. Martin

Stephen A. Martin
Director, Exempt Organizations
Rulings and Agreements



Department of the Treasury
Internal Revenue Service
Tax Exempt and Government Entities
P.O. Box 2508
Cincinnati, OH 45201

YISROEL M FLORANS
2312 FOREST CIR
TOMS RIVER, NJ 08755

Date: 11/21/2025
Taxpayer ID number: 41-2464146
Taxpayer or applicant name: Sunshine State Kids Foundation Inc
Form or application number: 1023
Person to contact: Name: Mr. Maiden
ID number: 0085956
Telephone: 877-829-5500

Dear Representative:

We're sending the enclosed material to you because of a power of attorney or other authorization we have on file.

If you have questions, contact the person listed at the top of this letter.

Sincerely,

Stephen A. Martin

Stephen A. Martin
Director, Exempt Organizations
Rulings and Agreements

Enclosures:
Letter 947

ARTICLES OF INCORPORATION
In compliance with Chapter 617, F.S., (Not for Profit)

2025 NOV 10 AM 10:14

ARTICLE I: NAME

The name of the corporation shall be **SUNSHINE STATE KIDS FOUNDATION INC.**

ARTICLE II: PRINCIPAL OFFICE

Principal street address: 5870 STIRLING RD., HOLLYWOOD, FL 33021

Mailing address: 5870 STIRLING RD., HOLLYWOOD, FL 33021

ARTICLE III: PURPOSE

The purpose for which the corporation is organized is:

- a. To provide scholarships and financial assistance to students K-12.
- b. Said organization is organized exclusively for charitable, religious, educational and scientific purposes, including, for such purposes, the making of distributions to organizations that qualify as exempt organizations under Section 501 (c) (3) of the Internal Revenue Code, or corresponding section of any future federal tax code.
- c. Upon dissolution of the organization, assets shall be distributed for one or more exempt purposes within the meaning of section 501 (c) (3) of the Internal Revenue Code, or corresponding section of any future federal tax code, or shall be distributed to the federal government, or to a state or local government, for a public purpose. Any such assets not disposed of shall be disposed of by the Court of Common Pleas of the county in which the principal office of the organization is then located, exclusively for such purposes or to such organization or organizations, as said Court shall determine, which are organized and operated exclusively for such purposes.
- d. No party of the net earnings of the corporation shall inure to the benefit of any member, trustee, director, officer of the corporation, or any private individual (except that reasonable compensation may be paid for services rendered to or for the corporation), and no member, trustee, officer of the corporation or any private individual shall be entitled to share in the distribution of any of the corporate assets on dissolution of the corporation.
- e. No substantial part of the activities of the corporation shall be carrying on the propaganda, or otherwise attempting to influence legislation (except as otherwise provided by the Internal Revenue Code section 501(h), or participating in, or intervening in (including the publication of distribution of statements), any political campaign on behalf of any candidate for public office.

ARTICLE IV: MANNER OF ELECTION

The manner in which the directors are elected and appointed is as provided for in the bylaws.

ARTICLE V: INITIAL DIRECTORS

YOSEF D ROSENGARTEN, DIRECTOR	5870 STIRLING RD HOLLYWOOD, FL 33021
ABRAHAM MAYER, DIRECTOR	5870 STIRLING RD HOLLYWOOD, FL 33021
LEONARD Y SCHWINDER, DIRECTOR	5870 STIRLING RD HOLLYWOOD, FL 33021

2025 NOV 10 AM 10:14

ARTICLE VI: REGISTERED AGENT

The name and Florida street address of the registered agent is:
NUCO FILINGS CORP.
155 OFFICE PLAZA DRIVE, 1ST FLOOR
TALLAHASSEE, FL 32301

ARTICLE VII: INCORPORATOR

The name and address of the incorporator is:
YOSEF D ROSENGARTEN
5870 STIRLING RD
HOLLYWOOD, FL 33021

Having been named as registered agent to accept service of process for the above stated corporation at the place designated in this certificate, I am familiar with and accept the appointment as registered agent and agree to act in this capacity

/s/Elliott Teitelbaum
Elliott Teitelbaum, REGISTERED AGENT

11/7/2025
DATE

I submit this document and affirm that the facts stated herein are true. I am aware that any false information submitted in a document to the Department of State constitutes a third degree felony as provided for in s.817.155, F.S.

/s/ Yosef D. Rosengarten
Yosef D Rosengarten, INCORPORATOR

11/7/2025
DATE

FINANCIAL COMMITMENT LETTER

(Credit Commitment – \$2,000,000)

Tunic Capital LLC
2071 Flatbush Avenue, Suite 22
Brooklyn, NY 11234

Date: December 9, 2025

Re: Commitment to Provide Credit Facilities – \$2,000,000

To Whom It May Concern:

Tunic Capital LLC (“Lender”) is pleased to issue this Financial Commitment Letter (the “Commitment Letter”) confirming our intention to make available to Sunshine State Kids Foundation Inc., a federally recognized nonprofit organization (the “Borrower”), a credit facility in an aggregate principal amount not to exceed Two Million (\$2,000,000) Dollars (the “Credit Facility”).

1. Purpose of Credit.

The Credit Facility is being provided to support the establishment, administration, and ongoing management of a Scholarship Funding Organization (“SFO”) in the State of Florida, including but not limited to:

- Scholarship program development and administration
- Regulatory, compliance, and reporting expenses associated with SFO operations
- Organizational, staffing, and administrative costs
- Outreach, application management, and scholarship award processing
- Any other activity directly required to operate a Florida-approved SFO

Use of funds for any purpose unrelated to the SFO is prohibited without the Lender’s prior written approval.

2. Nature of Commitment.

This Commitment Letter represents the Lender’s agreement to extend credit to the Borrower as follows:

- Total Commitment: Up to \$2,000,000.

- Form: Term loan, line of credit, or standby facility.
- Availability: Upon execution of definitive agreements and Borrower notice.
- Disbursement: In one or multiple advances as permitted under the final loan documents.

4. Term.

The commitment set forth herein shall remain valid until December 31, 2028, and as extended from time to time in writing by the Borrower and Lender.

5. No Assignment.

This Commitment Letter may not be assigned, transferred, or pledged without the Lender's prior written consent.

6. Governing Law.

This Commitment Letter shall be governed by and interpreted in accordance with the laws of the State of Florida.

We look forward to supporting your organization's efforts in the establishment and management of the SFO in Florida.

Sincerely,

Tunic Capital LLC

By:  _____

Name: David Katz

Title: Authorized Officer

FLORIDA SCHOLARSHIP PURCHASING HANDBOOK



2026-2027 School Year

Effective July 1, 2026

Covering the following programs:

- Family Empowerment Scholarship for Students with Unique Abilities (FES-UA)
- Personalized Education Program (PEP)
- Florida Tax Credit Scholarship (FTC) & FES-Educational Options

This handbook complies with s. 1002.395(6)(t), Florida Statutes. It includes enhanced internal controls regarding fraud prevention, conflict of interest, and documentation standards specific to this SGO.

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1 Introduction and Statutory Authority

1.1 Purpose of this Handbook

This Purchasing Handbook serves as the official policy guide for the administration of Florida's K-12 scholarship programs managed by Sunshine State Kids Foundation, Inc., It consolidates rules for the Family Empowerment Scholarship for Students with Unique Abilities (**FES-UA**), the Personalized Education Program (**PEP**), and the Florida Tax Credit Scholarship (**FTC**).

This document fulfills the requirements of s . 1002.395(6)(t), Florida Statutes, which mandates that Scholarship Funding Organizations (SFOs) provide parents with a handbook detailing authorized uses, prohibited items, and documentation standards.

1.2 Annual Updates and Revision Timeline

As required by law:

- This handbook is published annually by ****July 1****.
- In the event of legislative changes or Florida Department of Education (DOE) rule updates, revisions to this handbook will be published on the [SGO Name] website within ****30 days**** of such changes.
- Parents are responsible for adhering to the most current version of the handbook available online.

1.3 Handbook Feedback

We welcome feedback to improve this guide. Parents may submit suggestions for updates or clarifications via the Feedback Form on our website.

1.4 Program Definitions

- **FES-UA (Unique Abilities):** A scholarship for students with specific disabilities to customize their education (s. 1002.394). Funds may be used for tuition, therapy, curriculum, and technology.
- **PEP (Personalized Education Program):** A parent-directed educational option for students who are not full-time private school students (s. 1002.394). PEP students operate under a Student Learning Plan (SLP) but are **not** registered as home education students under s. 1002.41.
- **FTC / FES-EO:** Scholarships primarily for private school tuition (s. 1002.395).

2 General Purchasing Policies

The following policies apply to **ALL** scholarship programs unless otherwise noted.

2.1 Educational Benefit

All items and services purchased with scholarship funds must provide a demonstrable educational benefit. To meet this standard, an item must:

1. Explicitly support academic instruction or a defined learning goal.
2. Advance the student's academic progress.
3. Be appropriate for the student's age and ability level.
4. Be used directly by the student.

Items that are primarily recreational, household in nature, or used by the entire family do not meet this standard.

Documentation Request: The SGO reserves the right to request additional documentation, such as lesson plans, academic justification, or student-specific goals, to establish the educational benefit of any purchase.

2.2 Safety and Appropriateness

The SGO shall deny any item that poses a health or safety risk to the student. Items must also meet manufacturer minimum age requirements for safety purposes.

2.3 No Cash Purchases

Cash payments to private sellers are **not eligible** for reimbursement. All purchases must be trace- able. Acceptable forms of payment include checks, credit cards, debit cards, or digital payments (PayPal/Venmo) where a distinct transaction record is generated.

2.4 Shipping Guidelines

All items must be shipped to a residential address within the State of Florida.

- ****Marketplace Orders:**** Must ship to the FL address on file.
- ****Reimbursements:**** Items purchased out-of-pocket must be shipped to a FL address (or FL P.O. Box).
- ****Exception:**** Active-duty military families with PCS orders may have items shipped to their stationed location.

2.5 Refunds and Rebates (Mandatory Return)

Strict Policy: Any and all refunds for items purchased with scholarship funds must be credited back to the students scholarship account.

- Refunds may **never** be issued to the parent as cash, store credit, or gift cards.

- **Subscription Proration:** If a student withdraws or cancels a subscription, the unused portion must be refunded to the SGO.
- Accepting a cash refund for a scholarship purchase is a violation of program rules and may result in account suspension.

2.6 Multi-User Items (Strict Proration)

For subscription services or items that may be used by the whole family (e.g., internet, streaming services):

- If a "single-user" version of the subscription exists, reimbursement will be capped at the single-user rate, regardless of the family plan purchased.
- The SGO does not reimburse for the "Family Plan" upcharge.

2.7 Conflict of Interest (Family Restrictions)

Strict Policy: Immediate family members (parents, stepparents, guardians, siblings, grandparents) **may not** receive scholarship funds for providing services to their own beneficiary. This prohibition includes:

- Tutoring services.
- Choice Navigator services.
- Homework help.
- Music or Art lessons.
- Any other compensated service.

3 Personalized Education Program (PEP) Specifics

PEP is a distinct educational pathway authorized under s. 1002.394, F.S. It allows parents to direct their child's education using an Education Savings Account (ESA).

3.1 PEP vs. Home Education

While PEP is similar to homeschooling, it is legally distinct:

- **PEP Students:** Are registered with an SGO (like us), adhere to a Student Learning Plan (SLP), and receive state funding. They are legally defined as "PEP Students," not home education students.
- **Home Education Students:** Are registered with the district superintendent under s. 1002.41 and do **not** receive PEP funding (unless they are FES-UA).

3.2 PEP Accountability Requirements

To maintain eligibility, PEP students must:

- Submit a ****Student Learning Plan (SLP)**** annually to the SGO.
- Take a ****nationally norm-referenced test**** annually (e.g., MAP, IOWA, CLT) and submit scores to the SGO.
- Complete an annual sworn compliance statement.

3.3 PEP Allowable Uses & Restrictions

- **Allowable:** Curriculum, instructional materials, tuition for part-time tutoring, hybrid private schools, FLVS (private pay), standardized testing fees, Lab fees, Musical instruments, Sensory materials, School supplies, Learning manipulatives, Stand-alone online classes and Curriculum rules for "publicly available" materials
- **Restricted:** Unlike FES-UA students, PEP students are **NOT** eligible for:
 - **Medical Therapies:** ABA, Speech, OT, PT, or other specialized services.
 - **Technology:** Computers, laptops, and tablets are considered standard school supplies and are not reimbursable for PEP (unless explicitly authorized by future statute).
 - **College Savings:** Contributions to Florida Prepaid or 529 plans are ****not eligible**** for PEP students.

4 Authorized Expense Categories & Eligibility Matrix

4.1 Consolidated Eligibility Matrix

Use this chart to quickly determine if a category is eligible for your student's specific scholarship program.

Category	FES-UA	PEP	FTC / FES-EO
Tuition & Fees	✓ Eligible	✓ Eligible	✓ Eligible
Curriculum	✓ Eligible	✓ Eligible	✓ Eligible
Computers / Tablets	✓ Eligible	X Prohibited*	X Prohibited
Specialized Services (Therapies)	✓ Eligible	X Prohibited	X Prohibited
Sensory Materials	✓ Eligible	✓ Eligible	X Prohibited
Choice Navigator	✓ Eligible	✓ Eligible	✓ Eligible
College Savings	✓ Eligible	X Prohibited	X Prohibited
VPK / Readiness	✓ Eligible	X Prohibited	X Prohibited
Home Ed Eval	✓ Eligible	X Prohibited	X Prohibited

4.2 Tuition and Fees

Eligible Programs: FES-UA, PEP, FTC.

- **Allowable:** Registration, tuition, books, testing fees, uniforms (required vendor only).
- ****FTC/FES-EO Note:**** Funds may only be used for other purchases after all school tuition and required fees are fully obligated.
- **Documentation Required:** Invoice from school/provider showing student name, fee break-down, service dates, and zero balance/proof of payment and proof of payment. The school must be an eligible private school listed in the DOE directory.

4.3 Instructional Materials & Curriculum

Eligible Programs: FES-UA, PEP, FTC (restricted).

- **Allowable:** Textbooks, workbooks, online curriculum subscriptions, manipulatives (globes, maps, blocks).
- **Documentation Required:** Itemized receipt listing specific book titles or items. General receipts saying "Books" or "Amazon Order" are not accepted and proof of payment.

4.4 Technology and Digital Devices

Eligible Programs: **FES-UA ONLY** (PEP/FTC Prohibited)

- **Allowable:** Laptops, desktops, tablets, printers, monitors.
- **Frequency Limit:** Once every two (2) years per item type.
- **Replacement:** Early replacement requires a **Police Report** (theft) or **Repair Shop Letter** (irreparable damage).
- **Documentation Required:** Receipt showing make, model, and serial number and proof of payment.

4.5 Specialized Services (Therapies)

Eligible Programs: **FES-UA ONLY** (PEP/FTC Prohibited)

- **Allowable:** ABA, Speech, OT, PT, Music Therapy, Horse Therapy (PATH certified center).
- **Documentation Required:** Invoice showing provider license number, dates of service, specific service code/description, and proof of payment.

4.6 Tutoring, Homework Help, and Pre-Teaching

Eligible Programs: FES-UA, PEP, FTC.

4.6.1 Services Under \$50 per Hour

- No credential required if the service is academic in nature.
- **Documentation Required:** Invoice with provider name, contact info, dates of service, subject taught, hourly rate, and proof of payment.

4.6.2 Services \$50 per Hour or More

The provider must meet **one** of the following criteria:

- Valid or expired Florida teaching certificate.
- Bachelors degree in the relevant subject area.
- Three years of experience teaching or tutoring the subject (resume or LinkedIn).
- Enrollment in a related postsecondary program.
- National or industry certification in an academic field.

4.6.3 High-Cost Tutoring Services

Any reimbursement request for tutoring services that appears unreasonable in cost or frequency will be subject to a review of educational need, pricing, and eligibility. Contracts or cumulative services exceeding typical market rates may require additional justification or pre-authorization.

4.6.4 Immediate Relative Restriction

Tutoring or academic support **cannot** be provided by:

- Parents or Guardians.
- Grandparents.
- Siblings.
- Aunts, uncles, or cousins.
- Anyone living in the same household.
- Household employees.

Exception: A credentialed relative may only provide services through a fully documented, licensed business and only with pre-authorization.

4.6.5 Supervision is Not Tutoring

The following activities are **ineligible** for reimbursement:

- Watching or supervising homework without instruction.
- Babysitting or behavioral supervision.
- Monitoring screen time.
- Sitting beside a student without providing instruction.

4.7 Electives and Enrichment

Eligible Programs: FES-UA and PEP.

- **Art:** Paint, brushes, canvas, clay, kilns.
- **Music:** Instruments (purchase/rental), lessons, sheet music.
- **Gardening:** Soil, seeds, pots, fruit trees (max 7-gal), raised beds.
- **Cooking/Sewing:** Fabric, sewing machines, mixers, blenders.
- **Prohibited:** Commercial-grade equipment, live animals, permanent landscaping.
- **Documentation Required:** Itemized receipt. For lessons: Invoice with dates and rate, and proof of payment..

4.8 Physical Education (P.E.)

Eligible Programs: FES-UA, PEP.

- **Allowable:** Sports equipment (balls, nets, rackets), weights, non-motorized bicycles, kayaks, individual trampolines.
- **Lessons:** Dance, martial arts, swimming, team sports.
- **FTC/FES-EO Note:** PE Lessons are eligible, but individual equipment is prohibited.
- **Documentation Required:** Receipt clearly identifying item. For lessons: Invoice showing dates and student name and proof of payment.

4.9 Field Trips

Eligible Programs: FES-UA, PEP.

- **Allowable:** Museums, zoos, science centers, historical sites.
- **FL Theme Parks:** Max \$299/year. (Disney, Universal, SeaWorld, etc.).
- **Documentation Required:** Ticket stub or receipt showing student admission price. Family memberships must be prorated, and proof of payment.

4.10 Internet Resources

Eligible Programs: FES-UA, PEP.

- **Allowable:** Residential internet service, mobile hotspots.
- **Prohibited:** Starlink RV/Business, cable TV bundles.
- **Documentation Required:** Monthly bill showing service address (must match student address) and proof of payment.

4.11 College Savings Programs

Eligible Programs: FES-UA ONLY

- **Eligible:** Stanley G. Tate Florida Prepaid College Program, Florida 529 Savings Program.
- **PEP Status: X Prohibited** (as per State Authorized Use Chart).
- **Documentation Required:** Statement showing contribution to the specific beneficiary account and proof of payment.

4.12 VPK and School Readiness

Eligible Programs: FES-UA ONLY

- **Eligible:** Tuition and fees for approved VPK or School Readiness providers.
- **PEP Status: X Prohibited.**

4.13 Annual Home Education Evaluation

Eligible Programs: FES-UA ONLY

- **Eligible:** Fees for portfolio review by a certified teacher.
- **PEP Status: X Prohibited** (PEP students take norm-referenced tests, not portfolio evaluations).

4.14 Camp Eligibility Policy

This section explains how camp-related expenses are treated under each scholarship program. Camp eligibility varies significantly by program and must follow strict statutory compliance.

4.14.1 FTC and FES-EO (Private School Scholarships)

- ****Policy:**** Camp expenses are ****not eligible**** under FTC or FES-EO. These scholarships may only be used for private school tuition, approved fees, and specific instructional materials.
- ****Prohibited:**** Recreational, sports, academic, summer, day, or overnight camps.

4.14.2 FES-UA and PEP (ESA Track)

Camp expenses may be eligible ****only**** when the program meets strict instructional and credentialing standards. Camps considered recreational or nonsupervised are prohibited.

- ****Eligible Camps:****
 - Academic or skill-based camps that provide structured instruction or
 - Programs led by a credentialed instructor (teacher certificate, degree, professional cert).
 - In all cases the camps must be directly aligned to the student's educational goals or IEP needs. We may need professional documentation substantiating this connection.

- Programs providing documented, curriculum-driven instruction.
- ****Ineligible items****
 - Recreational, sport, or general day camps.
 - Programs primarily focused on leisure, childcare, or entertainment.
 - Non direct camp costs, including transportation, food, lodging, or apparel.
 - Programs lacking credentialed instructional staff.

4.14.3 Out-of-State Camps

Any camp held outside the state of Florida or any overnight camp, as they will be overnight should receive ****Pre-Authorization****. Approval is not guaranteed and must demonstrate:

- The educational necessity of the program.
- Availability of qualified instructional staff.
- A direct benefit to the student's academic development.

4.14.4 Documentation Requirements (UA & PEP Only)

****Pre-Authorization is NOT required**** for in-state camps if the parent provides the following documentation with their reimbursement request:

- Detailed invoice or receipt and proof of payment.
- Program description outlining instructional content.
- Reasonable proof of provider ability to provide the necessary service (e.g., license, certification).
- Dates of attendance.
- A statement describing the educational benefit to the student. Medical or professional documentation of need may be required.

Programs failing to meet instructional standards or documentation requirements will be denied.

5 Provider & Claims Procedures

5.1 Claim Submission Deadlines

Reimbursement requests must be submitted no later than ****July 31**** following the end of the school year in which the expense was incurred.

5.2 Pre-Authorization Deadline

Pre-authorization requests for the current school year are accepted until ****May 29****. Requests submitted after this date may not be processed in time for end-of-year purchasing.

5.3 Appeals Process

If a reimbursement request is denied, the parent may file an appeal.

1. **Notification:** The parent receives a denial notice stating the specific reason.
2. **Appeal Submission:** Parents may submit one (1) appeal per denied item within 30 days of the denial notification.
3. **Documentation:** The appeal must include new or clarified information (e.g., corrected receipt, educational justification).
4. **Final Decision:** Appeals will only be reviewed through this established process. Email appeals are not accepted. After the appeal decision is made, additional appeals for the same item will not be reviewed. The SGO's decision on the appeal is final based on statutory guidelines.

6 Travel and Out-of-State Policy

6.1 Out-of-State Activities

Generally, scholarship funds are intended for use within Florida. However, certain educational activities may be reimbursed if they occur out-of-state but within the United States.

- **Requirement:** ALL out-of-state activities require ****Pre-Authorization****.
- **Allowable:** Academic camps, specialized therapy centers not available in FL, historical field trips.
- **Documentation:** Must provide proof of attendance and educational itinerary.

6.2 Travel Expenses

Strictly Prohibited: Scholarship funds may **never** be used for:

- Airfare or train tickets.
- Hotel or lodging costs.
- Rental cars or ride-shares (Uber/Lyft).
- Gas or mileage reimbursement.
- Meals during travel.

7 Item Frequency Limits

To ensure funds are available for diverse needs, the following frequency limits apply to purchasing specific items. These limits apply per student, regardless of whether they switch scholarship programs.

Item Category	Frequency Limit
Computers / Laptops / Tablets (FES-UA)	1 every 2 years
Monitors / Printers (FES-UA)	1 every 2 years
Televisions (max 55")	1 every 2 years
Smartwatches (FES-UA)	1 every 2 years
Musical Instruments	1 every 2 years
Exercise Equipment (Treadmill, etc.)	1 every 2 years
Bicycles	1 every 2 years
Furniture (Desk, Chair)	1 every 2 years
Theme Park Tickets	1 per school year
Zoo/Museum Memberships	1 per institution/year

Exceptions: Items lost or broken before the 2-year limit may be replaced only with Pre-Authorization and required documentation (Police Report/Repair Letter).

8 Compliance & Accountability

8.1 Program Violations

The following actions constitute violations of the scholarship program:

- Purchasing non-educational or prohibited items.
- Accepting cash, store credit, or gift cards in exchange for returned scholarship items.
- Sharing account credentials with providers.
- Falsifying documents or invoices.
- Paying immediate family members for services.

8.2 Consequences

- **Denial of Funds:** Reimbursement requests will be rejected.
- **Repayment:** Parents may be required to repay misused funds to the SGO.
- **Account Suspension:** The scholarship account may be frozen pending investigation.
- **Termination:** Repeated or egregious violations will result in permanent removal.
- **Fraud Referral:** Suspected fraud will be reported to the FL DOE and Dept. of Financial Services.

8.3 DOE Authority

Parents acknowledge that the Florida Department of Education (DOE) retains the ultimate authority to:

- Determine student eligibility.
- Revoke a scholarship for non-compliance.
- Remove a provider from the program.
- Require the repayment of ineligible expenses.

A Consolidated Prohibited Items List

This list fulfills the statutory requirement for a "routinely updated list of prohibited items."

A.1 Universal Prohibitions (All Programs)

- **Motorized Vehicles:** Golf carts, go-karts, dirt bikes, electric scooters, hoverboards, jet skis, boats.
- **Animals:** Live pets, therapy animals, livestock, and pet food/housing.
- **General Household Items:** Furniture (couches, dining tables), large appliances (refrigerators, stoves, washing machines), home decor, cleaning supplies, groceries.
- **Home Improvements:** In-ground/above-ground pools, fences, sheds, permanent playground structures, flooring, lighting fixtures, irrigation systems, chicken coops.
- **Entertainment (Non-Educational):** Video game consoles (Xbox, PlayStation, Nintendo Switch), cable TV, streaming services (Netflix/Hulu).
- **Internet:** Starlink RV or Business internet services (Residential only allowed).
- **Travel:** Gas, mileage, airfare, hotels, rental cars.
- **Resale Tickets:** Tickets from scalpers or secondary markets (StubHub, eBay).
- **Services by Family:** Any compensated service provided by an immediate relative.
- **Inflatables:** Bouncy houses, giant inflatable slides.

A.2 FTC / PEP Specific Prohibitions

- Computers, laptops, tablets, e-readers.
- Medical therapies (ABA, Speech, OT, PT).
- Assistive technology devices.
- Medical devices and non-educational supplements.

A.3 FTC / FES-EO Specific Prohibitions

- Furniture.
- Field trips.
- Internet service.
- Individual PE equipment.

B Items Requiring Pre-Authorization

The following items or services require SGO review and approval **prior** to purchase. **Any item or service NOT explicitly listed as eligible in this guide requires Pre-Authorization.**

1. **Out-of-State Activities:** Any activity occurring outside Florida.
2. **Replacement Technology (FES-UA):** Replacement before the 2-year limit.
3. **Large Televisions:** TVs between 40-55 inches.
4. **Specialized Camps:** To verify academic/specialized criteria.
5. **Full-Time Tutoring:** Services exceeding standard part-time hours.
6. **Ceramic Kilns:** Due to installation/safety requirements.
7. **Non-School Field Trips:** Independent family trips.
8. **High-Risk Purchases:** Any item deemed "high risk" by the SGO audit team (e.g., items exceeding reasonable market rates, items frequently subject to fraud, or items that deviate from standard educational use).
9. **Custom Curriculum:** Materials not publicly available.
10. **Adaptive Exercise Equipment:** Specialized equipment for P.E.

C Glossary of Terms

Choice Navigator: An individual who helps parents select educational options and curriculum. They do not oversee the student's instruction but act as a consultant.

Educational Benefit: Products or services that support and advance a student's academic or functional goals.

Eligible Student: A student who meets the requirements for one of the Florida scholarship programs and has been awarded funds by the SGO.

Instructional Materials: Tools used for learning, including books, workbooks, digital courses, and manipulatives.

Parent: A resident of this state who is the natural or adoptive parent, legal guardian, or person otherwise having primary responsibility for an eligible student (s. 1000.21).

PEP (Personalized Education Program): A parent-directed educational option under s. 1002.394 where the student is not enrolled full-time in a private or public school.

Pre-Authorization: The process of obtaining SGO approval for specific items or services before a purchase is made.

Provider: An individual or organization authorized to provide services (like tutoring or therapy) to scholarship students.

SGO (Scholarship Funding Organization): A non-profit organization authorized by the state to administer scholarship funds.

D Statutory Compliance Crosswalk

Statutory Requirement (s. 1002.395(6)(t))	Handbook Section
Policies for authorized uses of scholarship funds	Section 4
Routinely updated list of prohibited items	Appendix A
Items/services requiring pre-authorization	Appendix B
Definition of "Parent" and "Provider"	Glossary (Appendix E)
Requirement to publish/update annually	Section 1.2
PEP-specific requirements (s. 1002.394)	Section 3
Documentation and Receipt Standards	Section 4 & 5
Refund policies	Section 2.5