

## Review Standards for CSP Grant Required Documents

Below is a list of documents required of CSP subgrantees prior to the release of CSP grant funds. All documents must be uploaded by the subgrantee to the Florida CSP Grant Tracking System ([www.flcsp.org](http://www.flcsp.org)-referred to as “FLCSP”).

Required Documents with Minimum Standards:	Additional Information:
<p><b>Non-Profit Documentation</b></p> <p>Documentation uploaded to FLCSP must include:</p> <ul style="list-style-type: none"> <li>___ 1. <a href="#">Articles of Incorporation as a Florida Non-Profit</a>;</li> <li>___ 2. Most current Annual Report and/or Amended and Related Articles filed through the <a href="#">Division of Corporations - Florida Department of State (myflorida.com)</a>; and</li> <li>___ 3. Fictitious name detail from: <a href="http://search.sunbiz.org/Inquiry/CorporationSearch/ByName">http://search.sunbiz.org/Inquiry/CorporationSearch/ByName</a>, if applicable. <i>A copy of the fictitious name request or application does not meet this requirement.</i></li> </ul>	
<p><b>Management Organization (MO) Questionnaire</b></p> <p>The MO questionnaire is provided to subgrantees by the program office. The questionnaire uploaded to FLCSP must:</p> <ul style="list-style-type: none"> <li>___ 1. Include answers to all applicable questions with adequate explanation;</li> <li>___ 2. Include the MO name, if applicable; and</li> <li>___ 3. Include the signature of the school’s board chair or school administrator. <i>This form may not be signed by a consultant or MO representative.</i></li> </ul> <p>If the subgrantee has contracted with a MO, or is planning to use a MO:</p> <ul style="list-style-type: none"> <li>___ 4. Include a copy of the signed contract <b>with</b> the questionnaire; and</li> <li>___ 5. The contract may not include provisions that allow the MO to take possession of equipment purchased with CSP or public funds under any circumstance. Regardless of threshold, all furniture, fixtures and equipment (including computer hardware) must be accountable and revert to the school district.</li> </ul>	<p>All subgrantees must complete the MO questionnaire, regardless of the use of a MO.</p> <p>If the subgrantee is using or planning to use a MO, responses must be substantive and allow FDOE to evaluate the independence of the governing board from the MO.</p>
<p><b>Executed Charter Contract</b></p> <p>The executed charter contract must include:</p> <ul style="list-style-type: none"> <li>___ 1. The district name;</li> <li>___ 2. The signatures of the sponsor and school representative(s); and</li> <li>___ 3. The school name. <ul style="list-style-type: none"> <li>• The school name on the executed contract must match the school name provided to the program office.</li> <li>• If school name is different, include an explanation with the charter contract.</li> </ul> </li> </ul>	

<ul style="list-style-type: none"> <li>• If school name is different due to fictitious name, the fictitious name detail must be provided with non-profit documentation.</li> <li>• If the contract has been approved by the district, but a copy is not yet available, documentation including the school and district name showing district approval may be uploaded for conditional approval. However, full approval will not be granted until the executed contract is provided.</li> <li>• The CSP Grant Specialist will cross-check the school name with the district and MSID database.</li> </ul>	
<p><b>Signed Lease or School Building Purchase Documentation</b></p> <p>Documentation uploaded to FLCSP must:</p> <ul style="list-style-type: none"> <li>___ 1. Include the school’s complete physical address (building number, street name, city, state and zip code) and match the school address in <a href="#">FLDOE’s MSID database</a>;</li> <li>___ 2. Include the correct school name;</li> <li>___ 3. Not include provisions that allow the Landlord/Lessor to take possession of equipment purchased with public funds under any circumstance. (Regardless of threshold, all furniture, fixtures and equipment, including computer hardware, must be accountable and revert to the school district if the school closes; and</li> <li>___ 4. Include the lease effective date of at least three months prior to the first day of school if the school is requesting grant funds for rent 3 months prior to the first day of school.</li> </ul>	<p>Lease may not include provisions that allows the landlord to take possession of equipment/materials purchased with public funds under any circumstance (typically in the Surrender portion of a standard lease). If lease includes this language, the subgrantee must negotiate an amendment or addendum.</p>
<p><b>Co-Location Questionnaire</b></p> <p>The co-location questionnaire is provided to subgrantees by the program office. The questionnaire uploaded to FLCSP must:</p> <ul style="list-style-type: none"> <li>___ 1. Be completed and signed by the school’s board chair or school administrator regardless of co-location status. <b>(This form may not be signed by a consultant or MO representative.);</b></li> <li>___ 2. Include answers to all applicable questions with adequate explanation;</li> <li>___ 3. Include answers that provide clear evidence that all schools are operating and publicized as separate schools if co-located*;</li> <li>___ 4. Include the complete school names and six-digit MSID number (two-digit district &amp; four-digit school number) of each school, if co-located. CSP Grant Specialists will confirm addresses against MSID database for co-location status.</li> </ul>	<p>Co-located schools must be clearly separate. Funds, students, and equipment must <b>not</b> be shared between co-located schools.</p> <p>*Section 5202(d)(1) of the ESEA provides that “[a] charter school may not receive...more than one grant for [planning and implementation activities].”</p>
<p><b>Governing Board By-Laws</b></p> <ul style="list-style-type: none"> <li>___ 1. By-laws must state that a quorum (a majority of the members of the board or committee) is required.</li> <li>___ 2. By-laws may not allow for board members to be compensated (except for travel reimbursement).</li> </ul>	

## Board Policies

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

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

*For expedited processing, upload this form with the school's policy manual and include the page numbers for each of the items listed below.*

### A. Procurement Policy

School's policy must include the following four requirements:

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

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

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

### B. Enrollment/Admissions Policy

The school's enrollment/admissions policy must:

- \_\_\_ 1. State that a lottery is conducted if the number of applications exceeds the number of seats available (first come/first serve not permitted);
- \_\_\_ 2. Only include lottery exceptions for the students below during the CSP grant period:
  - Siblings of enrolled students
  - Children of founding board members
  - Children of staff
  - Automatic enrollment of students in the immediate prior grade of an affiliate charter school (**Schools MUST share the governing board**)
    - *Exceptions for students of military families is not permitted during the grant period.*
    - *Lottery exceptions are not required, but may be included so long as the total number of students allowed under this exemption constitutes only a small percentage of the school's total enrollment.*
- \_\_\_ 3. Include a policy specific to the subgrantee school, if co-located. (Co-located schools must conduct separate enrollments and lotteries).

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

Lottery exemptions do not transfer between co-located schools.

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

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

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

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