

FINANCIAL POLICY & PROCEDURES

Amended May 26, 2020

In addition to the enclosed mentioned policies and procedures as adopted by DuBois Integrity Academy Inc. Governance Boards, the Board shall adhere to rules, policies, and procedures as outlined in the "DIA" Charter School Contract, the Employee Handbook, and all local, state, and federal laws with regards to public charter schools.



DUBOIS INTEGRITY ACADEMY

GOVERNANCE BOARD

Mrs. Deatrix (Dee) Morris RETUSAF LTC, Board Chair

Mrs. Sonya Lewis, MED, 35 Yr. Veteran Educator, Board Vice Chair

Mr. Charles Merritt, Jr. CPA, Board Treasurer

Mr. Robert (Bo) Culver, CPA, Board Secretary

Attorney Robert L. Mack, Board Member Dr

Kenneth Mitchell, Retired Air Force, Board Member

Gwynetta Ross, Realtor, Board Member

EXECUTIVE ADMINISTRATION

Craig Cason, Founder & Executive Director

Dr. Stephanie Payne, Principal

Dr. Jamela Worrell, Vice Principal

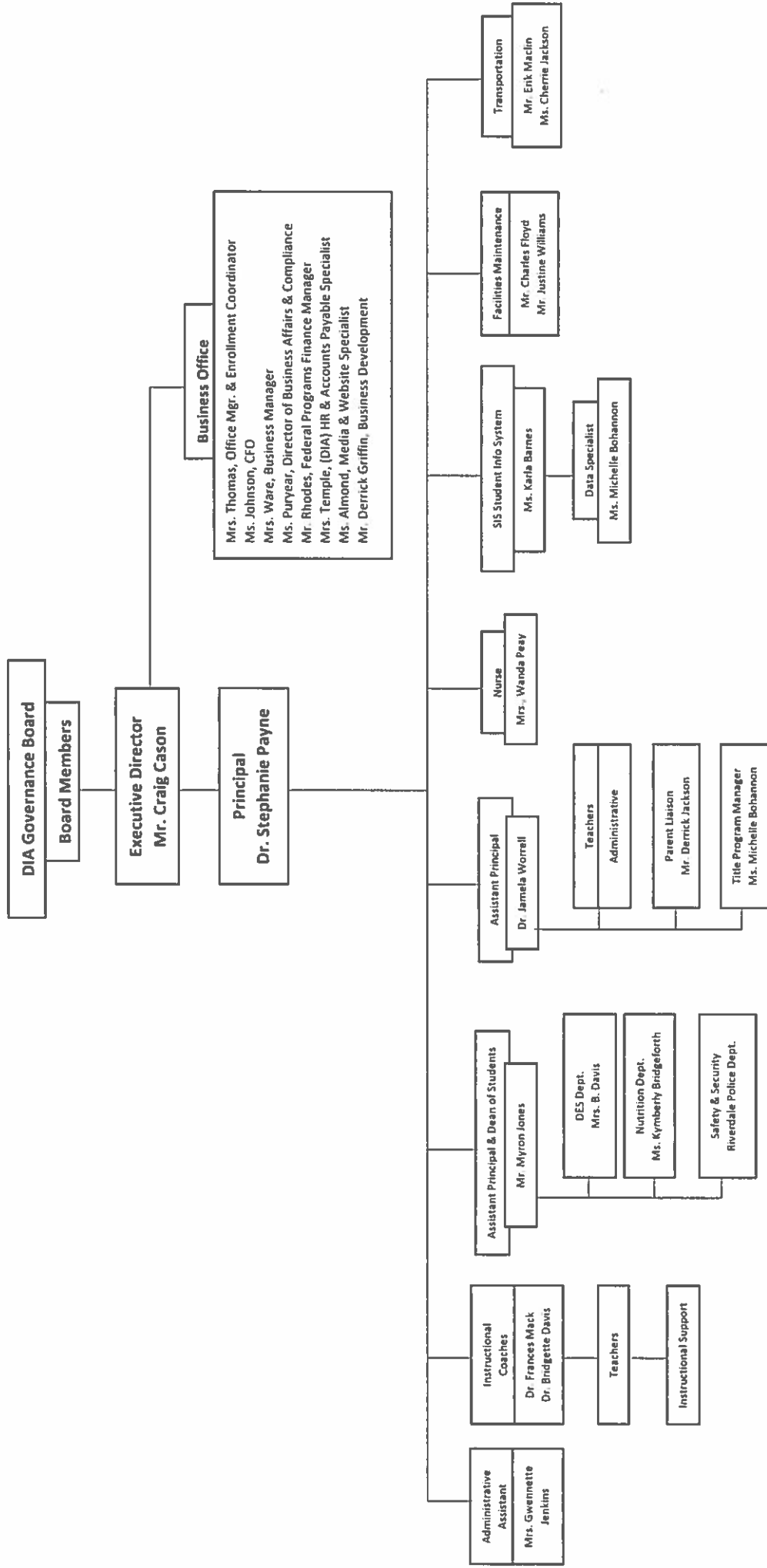
Myron Jones, Vice Principal & Dean of Students

Dr. Willie Herenton, CEO, DuBois Charter School Consortium

**DUBOIS INTEGRITY ACADEMY
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A. ORGANIZATIONAL CHART



B. SEGREGATION OF DUTIES RELATING TO FINANCIAL CONTROLS

The school's Executive Director will be responsible for the school operations within the scope of operating policy and budgetary approval by the Governing Board. The school's on-site administration/faculty and staff will report directly to the Principal, who then reports to the Executive Director, who then reports to the Governance Board. The CMO (DuBois Charter School Consortium), contracted by the Board, will provide day to day financial reporting, oversight and forecasting services that will be approved by the Executive Director and reported to the Governance Board for final oversight and review.

The Board will be responsible for:

1. Reviewing and approving a preliminary and final budget(s) prior to the beginning of the fiscal year;
2. Reviewing monthly and quarterly as well as annual financial statements, which include a balance sheet and statement of revenue, expenditures and changes in fund balance, at each public Board meeting
3. Annually adopting and maintaining operating budget for the school
4. Retaining the services of a certified public accountant/auditor to conduct the annual independent financial audit;
5. Establishing the Audit Committee
6. Reviewing and approving the audit report, including audit findings and recommendations;
7. Reporting to all applicable legal agencies including the charter school's sponsor
8. Overseeing the school's Executive Director and all financial matters delegated to the Executive Director.

Third Party Vendor for School Funds

- The Governance Board has contracted with MySchoolBucks and has mandated that DIA will no longer accept cash for any funds collection activity inclusive of Before/Aftercare, Field Trips, Fundraisers and all related activities.
- The Business Manager will be responsible for account reconciliation and providing appropriate allocation information to related school staff.
- The Executive Director will be presented reconciliation statements from MySchoolBucks on a monthly basis.
- This policy became effective 8/1/2018.

FUNDS (Checks/Money Orders) Collection Policy.

In the event that checks/money orders are collected, the Executive Director will ensure that the following policies are followed:

- The Business Manager will disburse 3-part receipt books to all schoolteachers/staff members that will be collecting funds after recording receipt book number for record keeping purposes.
- The Office Manager or Accounts Receivable Clerk will verify funds collected and counted by the person(s) collecting monies related to DuBois Integrity Academy, Inc. and will sign off on the total received as reconciled by receipts. (White copy to parent. Yellow copy turned into the

Administrative Office (Office Manager or Account Receivable Clerk) with funds,; Pink copy stays in book and turned into the Administrative Office (Office Manager or Account Receivable Clerk) , once receipt book has been completely used.

- All voided receipts will remain in the book. No tearing receipts out of book.
- The Office Manager or Accounts Receivable Clerk upon verification of funds collected by the school staff, will record the amount.
- The Office Manager or Account Receivable Clerk will turn over all funds and accounting documents to the Business Manager. The Business Manager shall ensure that the total funds collected in checks and money orders totals the receipts received.
- The Business Manager shall deposit funds in the school's local bank and record the deposit in the school's Financial System.
- The Office Manager or Account Receivable Clerk will record the receipts and list in numerical order to be reconciled later upon receipt of all completed receipt books.
- When all receipts in a book have been used, the receipt book should be returned to the Administrative Office for reconciliation by the Office Manager who together with the Business Manager will sign off on the completed reconciliation. Any discrepancies will be duly noted and reported to the Executive Director for appropriate action.

Credit Card Usage Policy

All Credit Card purchases must adhere to the following policies.

1. Only one credit card will be issued for the school to the Board Treasurer. The Board Treasurer is the Administrator for the Credit Card.
2. The Credit Card Administrator will authorize use of the credit card for school related purchases only based on the following guidelines:
 - A. Credit card purchases will be based on approved reoccurring charges, selected pre-paid school travel related services, specific curriculum purchases and school supplies.
 - B. The card number and related documents will be secured by the Business Manager in the school safe.
 - C. The Credit Card Administrator will maintain possession of the physical credit card at all times.
 - D. All credit card transactions require a signed purchase order approved by the Executive Director.
 - E. All credit card transactions over \$1,000.00 require additional written approval from the /Credit Card Administrator.
 - F. The credit card may not be utilized without prior written approval by the Executive Director. Purchases over \$1,000.00, must have additional written approval from the Credit Card Administrator/Treasurer.
 - G. The Credit Card Administrator, Credit Card Transaction Approver and Credit Card Facilitator have acknowledged their understanding of credit card use and procedures by signing a Credit Card Usage Agreement.
 - H. The Credit Card cannot be utilized under any circumstances for personal use or for items unrelated to school purchases or services.
 - I. Any changes to the Credit Card Policy must be approved by the Governance Board before implementing the change.
3. The Business Manager, with the appropriate approval is the only authorized credit card transaction facilitator. The Business Manager will provide account of all credit card expenditures to the Credit Card Administrator, the Executive Director, and the CFO on a

bi-monthly basis.

4. The CFO will provide a monthly reconciliation of the credit card account and verify that all procedures have been followed according to policy.
5. Violation of the Credit Card policy could result in a written warning, additional training and/or immediate termination based on the severity of the violation.

A. RECORDS AND ACCOUNTS

1. Chart of Accounts

DuBois Integrity Academy, Inc. shall utilize the standard state codification of accounts, as contained in the Financial and Program Cost Accounting and Reporting for Georgia schools, as a means of codifying all transactions pertaining to its operations.

(A) Bank Accounts

The Governance Board shall approve all banking and financial institutions used by each school. The Board Chairperson, Board Treasurer, Executive Director or other Board appointed designee is authorized to conduct all financial transactions in accordance with the policies set by the Governance Board. The school shall establish at least two (2) bank accounts, which shall include an operating account and internal funds (Expense) account and any other accounts deemed necessary by the Governance Board.

(B) Operating Account

All funds generated by the Georgia DOE Program and other revenue shall be deposited into the operating account for the corresponding school. The operating account shall be used to fund all operating expenses of the school, in accordance with the school's operating budget, including but not limited to, facility costs, payroll and supplies.

(C) Internal Funds Account (Expense)

All funds generated by school personnel of a particular school are for the benefit of that school or a school-sponsored activity. The internal funds account shall be used to fund school expenses as determined by the school's operating budget.

(D) Petty Cash

DuBois will maintain a petty cash account, not to exceed \$300.00 at any given time, with the exception of special usage designated and authorized by the Treasurer.

1. Prior approval from the Executive Director and Business Manager must be obtained before expenses will be reimbursed, in accordance with the reimbursement policy. All disbursements must be recorded on a petty cash disbursement log and a receipt must be attached. Funds spent without manager approval may not be reimbursed.
2. All cash reimbursements require proof of receipt of expenditures.
3. The Business Manager shall be responsible for all petty cash disbursements and receipts.

4. The Business Manager shall reconcile petty cash monthly, or when the fund is less than \$25.00.
5. Petty Cash is replenished by the Executive Director at the request of the Business Manager and approval of the Board Treasurer as needed.
6. No loans, temporary or otherwise, are to be made to employees from petty cash funds.
7. The Executive Director shall randomly audit the petty cash account at least twice per fiscal year.

(D) Check Signing Authority

a. Authorized signatories on all bank accounts.

- (1) Chair of the Governance Board
- (2) Treasurer of the Governance Board
- (3) Governance Board Vice Chair
- (4) Governance Board Secretary
- (5) Or Governance Board Designee, as approved by the Governance Board by a majority vote.

b. Check Signatures

- (1) Operating Accounts - All for purchases outside of "normal operations", (i.e. mortgage, rent, payroll, checks, etc.) over \$25,000.00 will require any two (2) of the above-named authorized signatories. No check may be signed by an individual who is also the payee.
- (2) Internal Accounts - All internal funds checks must be signed with one of the above signatures (1) signatures. No check may be signed by an individual who is also the payee.

- c. Except as noted above, all checks and contractual agreements for \$25,000 and more require specific approval of the Governance Board.

2. Reports

(a) Monthly Reports

DuBois Integrity Academy shall provide the Governance Board monthly financial statements which shall include a balance sheet, a statement of revenues and expenditures and changes in fund balance prepared in accordance with Generally Accepted Accounting Principles and in a format to include a detail of all revenue and expenditure activities compared to budgeted amounts relating to its operations. At the conclusion of each quarter the Financial Manager/CEO or Contracted Accounting Firm shall prepare a quarterly report to be presented to the Governance Board.

(b) Audited Statements

Each year DuBois Integrity Academy, Inc. shall retain an independent auditor to conduct an annual audit of its financial statement. The audit shall be submitted to the respective Sponsor on or before the

contractual date required by each district.

On or before April 1st of each year each school shall establish an audit committee. The audit committee shall establish factors to use for the evaluation of audit services to be provided by a licensed certified public accounting firm qualified to conduct audits in accordance with government auditing standards as adopted by the Georgia Board of Accountancy. Such factors shall include, but are not limited to, ability of personnel, experience, ability to furnish the required services, and such other factors as may be determined by the committee to be applicable to its particular requirements.

Responsibilities of the audit committee include:

- Overseeing the financial reporting and disclosure process
- Monitoring choice of accounting policies and principles
- Overseeing hiring, performance and independence of the external auditors
- Oversight of regulatory compliance, ethics, and whistleblower hotlines
- Monitoring the internal control process
- Overseeing the performance of the internal audit function
- Discussing risk management policies and practices with management.

The Governance Board shall inquire of qualified firms as to the basis of compensation, select a firm recommended by the audit committee, and negotiate a contract based on any of the following criteria:

- If compensation is not one of the evaluation factors, and is not used to evaluate auditing firms, then the Governance Board shall negotiate a contract with the firm.
- If compensation is one of the evaluation factors and is used to evaluate auditing firms, then the Audit Committee will, based on a request for proposal, recommend an auditing firm. The Board of Directors shall select the highest-ranked qualified firm based on the Audit Committee's predetermined criteria or the committee must document in its public records the reason for not selecting the highest-ranked qualified firm.
- The Governance Board may select a firm recommended by the audit committee and negotiate a contract with one of the recommended firms using an appropriate alternative negotiation method for which compensation is not the sole or predominant factor used to select the firm.

In negotiations with firms, the Governance Board may allow a designee to conduct negotiations on its behalf.

Every procurement of audit service shall be evidenced by a written contract embodying all provisions and conditions of the procurement of such services. For purposes of this section, an engagement letter signed and executed by both parties shall constitute a written contract. The written contract shall, at a minimum, include the following:

- a) A provision specifying the services to be provided and fees or other compensation for such services.
- b) A provision requiring that invoices for fees or other compensation be

submitted in sufficient detail to demonstrate compliance with the terms of the contract.

- c) A provision specifying the contract period, including renewals, and conditions under which the contract may be terminated.

Written contracts entered into pursuant to subsection above may be renewed. Such renewals may be done without the use of the auditor selection procedures provided in this section. Renewal of a contract must be in writing.

3. State of Financial Emergency

If a school's internal audit or annual financial audit reveals a state of financial emergency as defined in deficit financial position, the auditor shall notify the Du Bois Integrity School Governance Board, the Sponsor and the Department of Education. The internal auditor shall report such findings in the form of an exit interview to the Chair of the Governance Board and his/her designee within seven working days after finding the state of financial emergency or deficit position. A final report shall be provided to the entire Governance Board, the Sponsor and the Department of Education within fourteen working days after the exit interview. If the school is in a state of financial emergency, the school shall file a detailed financial recovery plan with the Sponsor.

4. Annual Budget

Every year a budget for each school shall be developed in accordance with Financial and Program Cost Accounting and Reporting by the GaDOE and presented to the Governance Board. The proposed budget shall cover projected revenue and expenses needed to operate the school on a day-to-day basis.

- 1 The Governance Board shall meet during any regular meeting, special meeting or workshop to review, discuss and/or approve the budget.
- 2 By law, After July 1, 2016, The School's Board may not approve an annual operating budget unless the school has held at least two public meetings to provide an opportunity for public input on the proposed budget. State law does not distinguish an original annual operating budget from a revised operating budget. Accordingly, if the school identifies the need to revise its budget during the school year, the school should conduct two public meetings to provide an opportunity for public input on the revised budget. A state charter school may utilize regularly scheduled meetings or meetings held for other purposes, if the school also utilizes a portion of the meeting to allow public comments on the proposed budget. The two meetings cannot within the same 7 calendar days. The state charter school must advertise the meetings in a local newspaper of general circulation in which other legal announcements for the jurisdiction are advertised.
- 3 After the budget is approved by the Governance Board, the approved budget will be placed on the school's website.

D) PURCHASING AND EXPENDITURES

- a. Accurate records of all transactions shall be kept and reports on expenditures shall be given to the

Governance Board on a monthly basis.

- b. Purchases over \$1,000.00 shall be recorded on a purchase order form. All purchase orders forms must be approved by the Executive Director or designee prior to being ordered.
- c. Checks will be issued against valid invoices only and not quotes or purchase orders. Invoices must be attached to a purchase order or requests for payment or a Statement of Work (SOW), when they are outside of the operating budget.
- d. Copies of all purchase orders shall be maintained on file and shall be matched to the order when items are received. All packing slips shall be verified against purchase orders when items arrive.

E) CONTRACTS

1. Consultant Agreements

The Principal may request the services of consultants to provide training and advisory services, so long as such amount is in accordance with the school's annual budget and approved by the Executive Director. Travel and expenses for consultants may be paid in accordance with the Travel and Transportation Fees Policy. No payment shall be made to the consultant until all services and supportive documentations have been completed.

(NOTE: Consultant Agreement listed as Exhibit 3)

2. Other Agreements

All other agreements for services shall be approved by the Governance Board.

The Executive Director or designee shall conduct an annual inventory evaluation of all property owned or leased by the school.

- 3. Expenditures from school funds shall be based upon the annual budget. The Governance Board shall be notified of expenditures not included on the annual budget or of expenditures that have exceeded the amount budgeted. All expenditures shall be paid for by check, unless specifically authorized to utilize other methods such as DIA credit card or ACH Payment. The exception is expenditures paid from Petty Cash according to Petty Cash policy.

F. School Fundraising

- 1) All fundraising projects conducted by the school shall be for the direct benefit of the students and shall contribute to the educational and extracurricular experiences of students. All fundraising projects must be approved by the Principal or designee prior to starting.
- 2) Money derived from any school fundraising project or activity shall be deposited in each respective school's internal funds account and accurate accounting records shall be maintained.
- 3) The determination of the fundraising projects and activities for school shall be the responsibility of the Principal, and shall conform to the following conditions:
 - a. Fundraising activities and projects must be authorized by the Principal. When presenting a

fundraising idea to the Principal, students and staff shall explain the need and propose how the funds may be utilized.

b. All fundraising requests shall be submitted to the Principal in writing.

4) The parent-teacher organization (PTO) may sponsor fundraising activities provided school-work and class time are not adversely affected.

G. Public Fees

Fees charged to the public shall be approved by the Governance Board. Fees may be charged to the public for copying records and materials, renting or leasing equipment or facilities, in-service and other training, or as deemed necessary by the Principal.

H. TRAVEL AND TRANSPORTATION

1. General Conditions

- All travel (whether in-state or out-of-state) by faculty and/or staff must be authorized and approved by the Principal. The Principal shall not authorize or approve any travel without the approval of the Executive Director and must state the purpose of the travel and that such travel is directly related to the official business of the school.
- When more than one employee is going to the same destination, travel shall be pooled whenever practical.
- Employees will be reimbursed for actual expenses incurred, including mileage, tolls, parking, lodging, airfare, rental car, registration fees and parking. Employees must present receipts for all expenses.
- All requests for travel reimbursement must be submitted on the appropriate Expense Form and must be submitted within thirty days of travel. Failure to submit reimbursement requests in a timely manner may cause the reimbursement to be forfeited by the employee.

2. In-State Travel

- Expenses for authorized travel by an employee may be paid for the use of his or her personal car while used during travel on school business. Travel conducted inside the county shall be reimbursed at the maximum rate allowed by the State of Georgia.

3. Out-of-State Travel

- One Day Trips

Expenses for authorized travel by employees which does not require an overnight stay shall be reimbursed at the maximum mileage rate established by the State of Georgia.

- Overnight Trips

Expenses for authorized travel by employees requiring absence in excess of one day shall

be reimbursed for travel expenses based on GaDOE guidelines.

4. Executive Director Travel

- All Executive Director travel must adhere to the school policy. All travel expensed to the credit card or any other travel reimbursements must be approved by the Governance Board Treasurer.

5. Student Travel

Student travel outside of the state requires approval from the Governance Board. Student travel inside the state must be approved by the Principal. A travel plan should be submitted that includes a specific agenda of activities, costs, chaperones, transportation and travel time.

I. FOODSERVICES

The Executive Director or designee shall be responsible for procuring food services for students from the outside vendor. The source of food service for students must be from a certified and licensed vendor by the GaDOE. Free and/or reduced food services shall be provided to qualified students.

J. INVENTORY AND PROPERTY RECORDS

The word "property" as used in this section means fixtures and other tangible personal property of a non-consumable nature the value of which is \$2,000 or more and the normal expected life of which is 2 years or more. These assets are posted in the record of capitalized property and depreciated over an estimated useful life rather than expenses in the year of acquisition.

- a. On occasion, items may be acquired as a group of multiple components with the intention that the group of components will be used together for one purpose. In these cases the group of items, which meet the above definition of property, may be recorded in the property records as the group rather than individually. This group of assets then will be utilized, accounted for and depreciated as one item rather than as individual items.
- b. The Principal shall be responsible for the care, custody, safekeeping and accounting of all school property. He/she may designate a School employee as the Property Clerk for the day-to-day management of School property and property records.
- c. Each item of property shall be marked or identified by each School.

The Principal or his/her designated representative shall:

Establish and maintain an adequate and accurate record of items of tangible personal property consisting of furniture, fixtures, equipment, audio-visual materials, and computer software.

See that a physical inventory of all such property is conducted annually by a person other than the custodian of the property. Any items or property which cannot be located or accounted for shall be reported to the Executive Director and Governance Board for official action. The completed and reconciled inventory shall be presented to the Governance Board.

Serve as the disposal officer for surplus property in compliance with State Board of Education Rules.

Each school employee shall be responsible to take those measures necessary to properly safeguard property under his/her control against loss, damage, or undue depreciation and shall do what is necessary to ensure the proper maintenance and safekeeping of the school property. The Principal shall also be responsible for initiating any requests for the use or disposal of school property. He/she shall be responsible for providing information pertaining to school property records. He/she shall report, when received, property acquired from sources other than the School funds such as from the parent-teacher organization (PTO) and similar sources.

In the event the school incurs a loss or theft of property, a written report identifying specific property damaged or lost shall be submitted to the Principal.

If theft is suspected, the loss must be reported to law enforcement authorities and an insurance claim filed.

The Principal shall report to the Executive Director & the Board any property that has been lost or stolen if not recovered within thirty (30) days after the discovery of the loss or theft except major losses shall be reported to the Board immediately. Such report shall include a recommendation that the property record be made inactive and any information applicable to personal liability shall also be reported.

K. INVENTORY AND PROPERTY RECORDS FOR ITEMS PURCHASED WITH CHARTER SCHOOL PROGRAM (CSP) GRANT FUNDS

- a. All equipment/inventory items with 600 series object codes that were purchased with title I grant funds, regardless of individual unit cost, will be labeled as follows:

Property of (Insert School District Name)

- i. (Insert) School Name
- ii. (Insert) Inventory ID/Serial
- iii. Number of items Purchased with Federal Title I Funds

- b. All Title I funded capital purchases of equipment/inventory items with 600 series object codes will be inventoried and labeled as stated above, regardless of individual unit cost. The school will maintain an inventory report for all Title I funded equipment/inventory items with 600 series object codes using the format provided by the Department of Education. The inventory report will be updated when new items are purchased, items are disposed/given a final disposition, and during each biannual inventor.

L. INTERNAL FUNDS CORPORATE PROGRAM

BEFORE AND AFTER CARE

1. Receipt of Funds and Transfer of Funds to Business Manager

Payments for the Before and After Childcare Services are made to the Child Care Coordinator or

assigned school representative via MySchoolBucks or money order. If paid by money order, a receipt is completed utilizing a 3-part receipt form. Payments and receipts are handled as follows:

School personnel are required to obtain a pre-numbered receipt books from the school's Administrative Office. It is prohibited for any staff personnel to purchase, borrow or trade a receipt book from any other source unless special approval has been received by the Business Manager. The Administrative Office maintains a log of all receipt books issued to the school staff. The assigned individual/department must maintain the location of the receipt book at all times. No receipts may be pre-signed or altered (with correction fluid, ink pen, etc.) after the initial receipt has been prepared and issued, unless initialed by all parties (issuing and receiving parties). Once a receipt book has been completed, it is returned to the Administrative Office with the third copy intact.

Receipt Distribution – The receipts are to be used in numerical order and copies distributed in the following order:

- The original or first copy of the receipt is given to the payer.
- The second copy of the receipt should be maintained in numerical order and turned in to the Business Manager at the Administrative Office with the funds collected with the deposit transmittal, in a locked Money Bag.
- The third copy of the receipt is maintained in numerical order in the receipt book in the assigned department until all receipts are used.

When all receipts in a book have been used, the book should then be returned to the Administrative Office and exchanged for a new book.

Void Receipts – In the event a receipt must be voided, all three (3) copies are to be retained in the receipt book. **DO NOT DESTROY ANY PORTION OF A VOIDED RECEIPT.**

Deposit Reconciliation – The pre-numbered receipts are to be reconciled by the Office Manager in the Administrative Office to the amounts submitted on each deposit transmittal.

Failure to follow this procedure could result in disciplinary action, including an audit finding to be shared with the Executive Director.

DIA's Administrative Office may be contacted at 770-629-1534, if you have questions.

2. Data Entry by Office Manager or Account Receivable Clerk

The Business Manager provides the data entry of all payments into to the system, verifying payments and recording the denominations in cash and coins and listing checks by check number, payer and amount. All checks and money orders are endorsed using a DIA endorsement stamp. The deposits are then prepared, listing cash, coins and checks and transferred to the bank for deposit in a money bag. Deposit receipts are kept on file by month and date order and are entered into the bookkeeping system. Deposits are made daily with the exception of cash received under \$1,000.00.

Refer to section L-1 for details on funds verification and receipt reconciliation.

3. CAPS – Childcare and Parent Services

The Childcare and Parent Services (CAPS) program is designed to help low income families afford safe quality childcare. This service is provided by the Georgia counties local Department of Family and Children Services (DFCS). Parents requiring or seeking assistance may contact CAPS and apply for assistance with their childcare services. At the parents' request, the school's CAPS Provider Number is provided and the school is notified via the CAPS System as to whether the child has been accepted into the assistance program.

The Business Manager provides an updated CAPS list to the Childcare Coordinator at the beginning of each month. At the end of each month, the Childcare Coordinator returns the completed attendance list to the Administrative Office that is initialed daily by each parent that has a child or children in attending BAC (Before and Aftercare). The Business Manager uses this list to key and upload the attendance to the CAPS System for payment to the DuBois Integrity Academy.

CAPS provide payment to the school's Internal Funds Account (BAC) via ACH. This entry is entered into the bookkeeping system.

4. Returned or Reversed Payments

Returned items are primarily returned by banks due to insufficient funds or closed accounts. The bank returns should always provide a reason for the return. The information received is safeguarded as a return. A charge of no less than \$30.00, plus the amount of the return is to be collected on the returned item.

The Business Manager notifies the Head of the School's Childcare Services, providing the name of the payer/parent, name of the student, date and amount of the return. The funds are to be collected expeditiously, but no later than 10 business days from date of notification to original payor. The Childcare Coordinator notifies the Head of Childcare Services who then notifies the Business Manager of that payment has been made.

G. GRANT PROCUREMENT POLICY

- 1. Application:** The Charter School, and its employees, officers and agents, will follow the policies set forth herein (the "CSP Procurement Policy") with respect only to the procurement of supplies and other expendable property, equipment, real property, and other services purchased by the Charter School with federal funds awarded under the Public Charter Schools Program.
- 2. Conflicts of Interest:** No employee, officer, or agent shall participate in the selection, award or administration of a contract supported by the Charter Schools Program grant, if a real or apparent conflict of interest would be involved. A conflict would arise when the employee, officer or agent, any member of his or her immediate family, his or her partner, or an organization which employees or is about to employ any of the parties indicated herein, has a financial or other interest in the firm selected for an award. The officers, employees, and agents of the Charter School shall neither solicit nor accept gratuities, favors or anything of monetary value from contractors, or parties to sub-agreements. Any Board member with a real or perceived conflict of interest will not vote and will recuse himself/herself from the meeting

during discussion. The Charter School's Conflict of Interest Policy shall be applicable to any selection, award or administration of a contact subject to this CSP Procurement Policy.

3. **Competition:** All procurement transactions subject to this CSP Procurement Policy shall be conducted in a manner to provide, to the minimum extent practical, open and free competition. Each employee, officer and agent of the Charter School responsible for the procurement of goods and services subject to the CSP Procurement Policy (each such employee, officer or agent referred to hereinafter as a "Procurement Officer" of the Charter School) shall be alerted to organizational conflicts of interest as well as noncompetitive practices among contractors that may restrict or eliminate competition or otherwise restrain trade. In order to ensure objective contractor performance and eliminate unfair competitive advantage, contractors that develop or draft specifications, requirements, statements of work, invitation for bids, or requests for proposals shall be excluded from competing for procurements for the Charter School. Awards must be made to the bidder or offeror whose bid or offer responsive to the solicitation and is most advantageous to the Charter School, price, quality and other factors considered. Solicitations shall clearly establish all requirements that the bidder or offeror shall fulfill in order for the bid or offer to be evaluated by the Charter School. Any and all bids or officers may be rejected when it is in the Charter School's interests to do so.

4. **Procedures Generally:** Procurement Officers shall avoid purchasing unnecessary items, and where appropriate, make an analysis of lease and purchase alternatives to determine which would be the most economical and practical procurement for the Charter School. Positive efforts shall be made by recipients to utilize small businesses, minority-owned firms and women's business enterprises whenever possible. The Charter School is responsible for settling and satisfying a contractual and administrative issues arising out of procurements, including but not limited to

5. disputes, claims, protests of award, source evaluation or other matters of contractual nature. The Charter School shall document and retain all bids received and conduct a price comparison analysis. The selection of any sole-source providers must be justified and documented. No charter school management company serving as a Procurement Officer shall be authorized to make all purchases subject to the CSP Procurement Policy without board or school leadership involvement and approval. Solicitation for goods and services subject to this CSP Procurement Policy shall include the following:
 - A. A clear and accurate description of the technical requirements for the material, product, or service to be procured. In competitive procurements, a description shall not contain features which unduly restrict competition.
 - B. Requirements which the bidder/offeror must fulfill and all other factors to be used in evaluating bids or proposals.
 - C. A description, whenever practicable, of technical requirements in terms of functions to be performed or performance required, including the range of acceptable characteristics or minimum acceptable standards.
 - D. The specific features of brand name or equal descriptions that bidders/offerors are required

to meet when these items are included in the solicitation.

- E. The acceptance, to the extent practicable and economically feasible, of products and services dimensioned in the metric system of measurement; and
 - F. Preference, to the extent practicable and economically feasible, for products and services that conserve natural resources and protect the environment and are energy efficient.
6. **Permissible Procurement Instruments:** The type of procuring instruments used (e.g., fixed price contracts, cost reimbursable contracts, purchase orders, and incentive contracts) shall be determined at the discretion of the charter School, but must be appropriate for the particular procurement and offer promoting the best interest of the program or project involved. In no event shall the “cost-plus-a percentage of cost” or “percentage of construction cost” methods of contracting be used.
 7. **Contractor Qualifications:** Contracts shall be made only with responsible contractors who possess the ability to perform successfully under the terms and conditions of the proposed procurement. Consideration shall be given to factors such as contractor integrity, record of past performance, and financial and technical resources or accessibility to other necessary resources.
 8. **Cost and price Analysis:** Some form of cost or price analysis must be made and documented in the procurement files in connection with every procurement action subject to this CSP Procurement Policy. Price analysis may be accomplished in various ways, including the comparison of price quotations submitted, market prices and similar indicator, tighter with discounts. Cost analysis is the review and evaluation of each element of cost to determine reasonableness, allocability, and allowability.
 9. **Contract Administration:** A system for contract administration shall be maintained to ensure contractor conformance with the terms and Specification of the contract, and to ensure adequate and timely follow up of all purchases. The Charter School shall evaluate contractor performance and document, as appropriate, whether contractors have met the terms, conditions, and specification of the contract.
 10. **Purchases more than \$500, less than \$25,000:** For all goods and services, including CSP purchases, whose cost is more than \$500.00, but less than \$25,000.00, the Procurement Officer shall ensure that the Charter school obtains at least three, written/printed quotations, estimates or advertisement for the goods or services, if feasible and written/printed note explaining the reason for the vendor selection. Two (2) or more persons are required for approval of CSP purchases over \$750.00 If the school des electronic banking and cannot show two authorized check signatures on the purchases over \$750.00, two signatures must be on a written/printed purchase requisition form.
 11. **Purchases \$25,000 or More:** For all goods and services whose cost is \$25,000.00 or greater, the Procurement Officer shall ensure that the Charter School obtains at least three bids and/or proposals. In addition, the following provisions shall apply.
 - A. Procurement records and files must include the following at the minimum:

1. Basis for contractor selection.
 2. Justification for lack of competition when competitive bids or offers are not obtained.
 3. Basis for award cost or price.
- B. Contracts shall contain contractual provisions or conditions that allow for administrative, contractual, or legal remedies in instances in which contract terms, and provide for remedial actions as may be appropriate.
- C. All contracts shall contain suitable provisions for termination by the Charter School, including the manner by which termination shall be effective and the basis for settlement. In addition, contracts must describe conditions under which the contract may be terminated for default, as well as conditions where the contract may be terminated, because of circumstances beyond the control of the contractor.
- D. All contracts must include a provision that a duly authorized representative of the Charter School must have access to any records of the contractor, which are directly pertinent to the specific program.
- E. The Charter School shall keep on file all pre-award review and procurement documents, such as request for proposals or invitations for bids and independent cost estimates.