



Board of Directors' Meeting

Tuesday, August 9, 2022

2:00 p.m.



Four Corners Charter School, Inc.

Tuesday, August 9, 2022 | 2:00 p.m.

Four Corners Charter School
9100 Teacher Lane
Davenport, FL 33837



Board Meeting Agenda

Call to Order

Roll Call

- I. **Public Comments**
- II. **Administrative**
 - Approval of June 7, 2022 FCCS Board Meeting Minutes
- III. **CSUSA Reports**
 - State Director Report
 - FSA Assessments – Data Analysis
 - 2022 Spring Survey Results
 - Principal Report
- IV. **Financials**
 - FY22 Q4 Financial Review
- V. **Old Business**
 - Governing Board Policy FL – Disqualification List of Certain Individuals
 - HVAC Update
- VI. **New Business**
 - LEA Resolution
 - CSUSA Reading Plan
 - Bus Purchase
 - Instructional Personnel Evaluation System
 - School Administration Evaluation Plan
 - Grants Process Manual
 - Out of Field Waivers
- VII. **Public Comments**
- VIII. **Adjournment**

◀ **Next Meeting: Tuesday - October 4, 2022 at 2:00 p.m.** ▶

BOARD MEETING MINUTES

Name of Foundation: Four Corners Charter School, Inc.

Board Meeting: **Tuesday, June 7, 2022**

School(s): Four Corners Charter School

The minutes of Sunshine Law meetings need not be verbatim transcripts of the meeting. These minutes are a brief summary of the events of the meeting.

Date:	Start	End	Next Meeting:	Next time:	Prepared by:
June 7, 2022	10:05 a.m.	10:51 a.m.	August 9, 2022	2:00 pm	M. Llanes/R. Weaver
Meeting Location:					
9100 Teacher Lane, Davenport, FL 33897					
Attended by:					
Board Members: Teresa Castillo, Chair Julius Melendez, Director Mollie Cunningham, Director Jon Arguello, Director Absent: James Miller, Director			Other Attendees: Rita Weaver, Board Governance Director Angela Barner, Osceola School District Finance Department Jodi Evans, CSUSA Deputy Director Maggie Llanes, Executive Coordinator for Board Governance		

CALL TO ORDER

- Pursuant to public notice, the meeting commenced at 10:05 a.m. with a Call to Order by Chair Teresa Castillo. Roll call was taken, and quorum established.

I. ADMINISTRATIVE

Approval of Board Meeting Minutes

- The board reviewed the minutes of the May 3, 2022, Four Corners Charter School, Inc. Board Meeting.

MOTION: Motion was made by Julius Melendez and seconded by Mollie Cunningham to approve the minutes of the May 3, 2022, for Four Corners Charter School, Inc. Board Meeting. Motion was approved unanimously. (4-0, 1 absent)

II. CSUSA Strategic Priorities Reports

Principal Report

Assistant Principal Joseph Childers shared with the Board that the school is focusing on training the 275 kids that signed up (34% of students attending) and summer bridge, now that school is out. FSA data shows 48% are proficient.

III. FINANCIALS

- FY22 Budget Amendment for Four Corners Charter School, Inc.
The board reviewed the FCCS, Inc. FY22 Budget Amendment and all questions were answered by Osceola Director of Finance, Ms. Angela Barner.

MOTION: Motion was made by Julius Melendez and seconded by Jon Arguello to accept the FY22 Budget Amendment for Four Corners Charter School, Inc. as presented. Motion was approved unanimously. (4-0, 1 absent)

IV. OLD BUSINESS

There was no Old Business.

V. NEW BUSINESS

Mental Health Plan Allocation

- The board reviewed the Mental Health Plan Allocation Plan for Four Corners Charter School and discussed the pros and cons of opting out of the District Mental Health Allocation Plan.

MOTION: Motion was made by Jon Arguello and seconded by Mollie Cunningham to opt out of the Osceola School District's Mental Health Plan Allocation for Four Corners Charter School, and approve the Mental Health Assistance Plan Allocation for Four Corners Charter School, as presented. Motion was approved unanimously. (4-0, 1 absent)

Governing Board Policy FL – Disqualification List of Certain Individuals

- The board discussed the Governing Board Policy FL – Disqualification List of Certain Individuals. The board discussed the rule, and the process that this policy would create as well as identifying the presiding officer and the individual appointed by the governing board to report to the FDOE, the individuals who are disqualified. Ms. Rita Weaver identified a flow chart that outlined this process and policy, and the board requested a copy as well as identifying School Board Attorney role, if any.

This item was unanimously tabled until August 9, 2022 Board Meeting.

Parent/Student Handbook

- The board reviewed the Parent/Student Handbook. All questions were answered by Ms. Weaver and Mr. Childers.

MOTION: Motion was made by Julius Melendez and seconded by Mollie Cunningham to approve the FY23 Parent/Student Handbook for Four Corners Charter School, as presented. Motion was approved unanimously. (4-0, 1 absent)

Parent Facilitator

- The board discussed the requirements of Parent Facilitator.

MOTION: Motion was made by Jon Arguello and seconded by Mollie Cunningham to appoint Evelyn Cordero as the Parent Facilitator for Four Corners Charter School, as presented. Motion was approved unanimously. (4-0, 1 absent)

FY23 Safety and Security Policy

- The board reviewed the FY23 Safety and Security Policy. The board discussed the requirements under the MSD Public Safety Act and this policy meets and exceeds those requirements. All questions were answered by Ms. Weaver.

MOTION: Motion was made by Julius Melendez and seconded by Mollie Cunningham to approve the FY23 Safety and Security Policy for Four Corners Charter School, as presented. Motion was approved unanimously. (4-0, 1 absent)

FY23 CSUSA Compensation Plan

- The board reviewed the FY23 CSUSA Compensation Plan.

MOTION: Motion was made by Julius Melendez and seconded by Mollie Cunningham to approve the FY23 CSUSA Compensation Plan for Four Corners Charter School, as presented. Motion was approved unanimously. (4-0, 1 absent)

The next board meeting is scheduled for Tuesday, August 9, 2022 at 2:00 p.m. at Four Corners Charter School.

VI. PUBLIC COMMENTS

- There were no public comments.

VII. ADJOURNMENT

Chairwoman, Teresa Castillo adjourned the June 7, 2022, Four Corners Charter School, Inc. Board Meeting at 10:51 a.m.

Teresa Castillo, Chairwoman

Date: _____



Denise Thompson

School Grade History

2019 2021 2022

B 58	B 58	B 58
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FOUR CORNERS CHARTER SCHOOL

Grade Structure: K-5 Total Enrollment: 1,031

% ED Students 80%

% Minority Students 61%

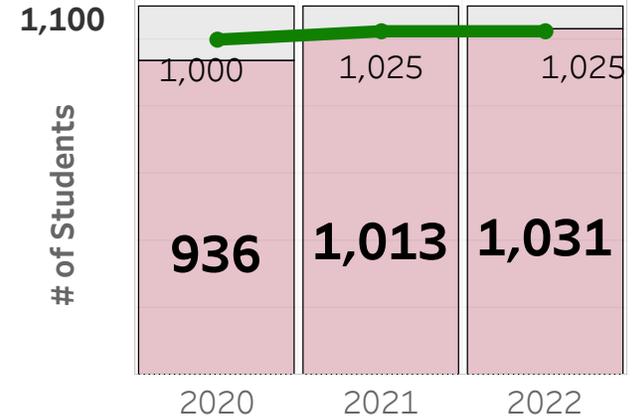
Equitable Outcomes-FL Federal Index

Year Over Year Comparisons

Overall	B	ED	B
58 58		55 58	
White	A	ELL	B
61 77		51 56	
Black	C	SWD	D
51 50		27 34	
Asian		Hispanic	C
		52 59	

Operational Excellence

Enrollment



% Prog Capacity	85%	92%	94%
% Target Met	94%	99%	101%

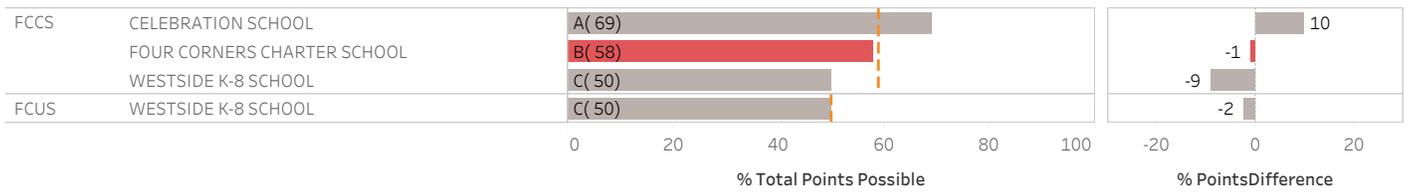
Note: Bar is colored when a school improved their prior year score. Lines represents 2019 scores.

Student Success, Teaching and Learning

	ELA	ELA LG	ELA LG Low 25	Math	Math LG	Math LG Low 25	Science	Social Studies	MS Accel	Grad Rate	C&C Accel	% of Total Points	Letter Grade
CSUSA FL	54	55	47	53	60	55	49	74	75	96	60	62	A
2022 Goals	58	67	65	57	65	62	57					62	A
2022 Actuals	52	61	53	59	68	63	52					58	B
2022 Projections	52	57	53	46	52	51	38					50	C
Diff Spring Actuals and Winter Projectio..	0	4	0	13	16	12	14					8	

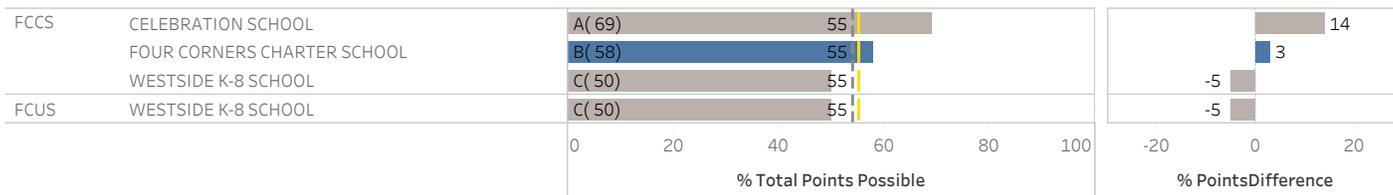
2022 CSUSA vs Local School Averages: % of Total Points

% Point Difference from Average



2022 CSUSA vs Local School Grade: % of Total Points

% Point Difference from District







FOUR CORNERS
CHARTER SCHOOL

CSUSA Spring 2021-2022

Staff, Parent and Student Stakeholder Satisfaction Survey



Survey Scale & Interpreting The Results

6 Point Scale

- 3 Levels of agreement with “**strongly agree**” being the most intense (on the positive feedback spectrum)
- 3 Levels of disagreement with “**strongly disagree**” being the most intense (on the negative feedback spectrum)

Reporting Total Agree

- Combination of “strongly agree”, “agree” and “somewhat agree” represents Total Satisfaction





FOUR CORNERS
CHARTER SCHOOL

CSUSA Survey Results

Spring 2021-2022

2021-2022 Spring Survey Summary

Participation Rate & Results Reliability

			2020-2021		2021-2022	
			Fall	Spring	Fall	Spring
Staff	Instructional	Responses Count	58	59	52	60
		Total Count	59	59	57	57
		Participation Rate	98%	100%	91%	100%
	Non-Instructional	Responses Count	21	23	11	23
		Total Count	21	21	28	28
		Participation Rate	100%	100%	39%	82%
Parent	Families	Responses Count	485	285	411	316
		Total Count	709	709	666	666
		Participation Rate	68%	40%	62%	47%
Student	All Students	Responses Count	156	126	149	132
		Total Count	187	187	171	171
		Participation Rate	83%	67%	87%	77%

Based on established benchmark, 2021-2022 Spring Survey participation rate has:

Parent **Moderate Reliability**

Staff **High Reliability**

Student **High Reliability**

High Reliability: 75% and above

Moderate Reliability: between 75% and 50%

Low Reliability: less than 50%

Parent:

High Reliability: 50% and above

Moderate Reliability: between 50% and 25%

Low Reliability: less than 25%

Student:

High Reliability: 40% and above

Moderate Reliability: between 20% and 40%

Low Reliability: less than 20%

School Results by Category

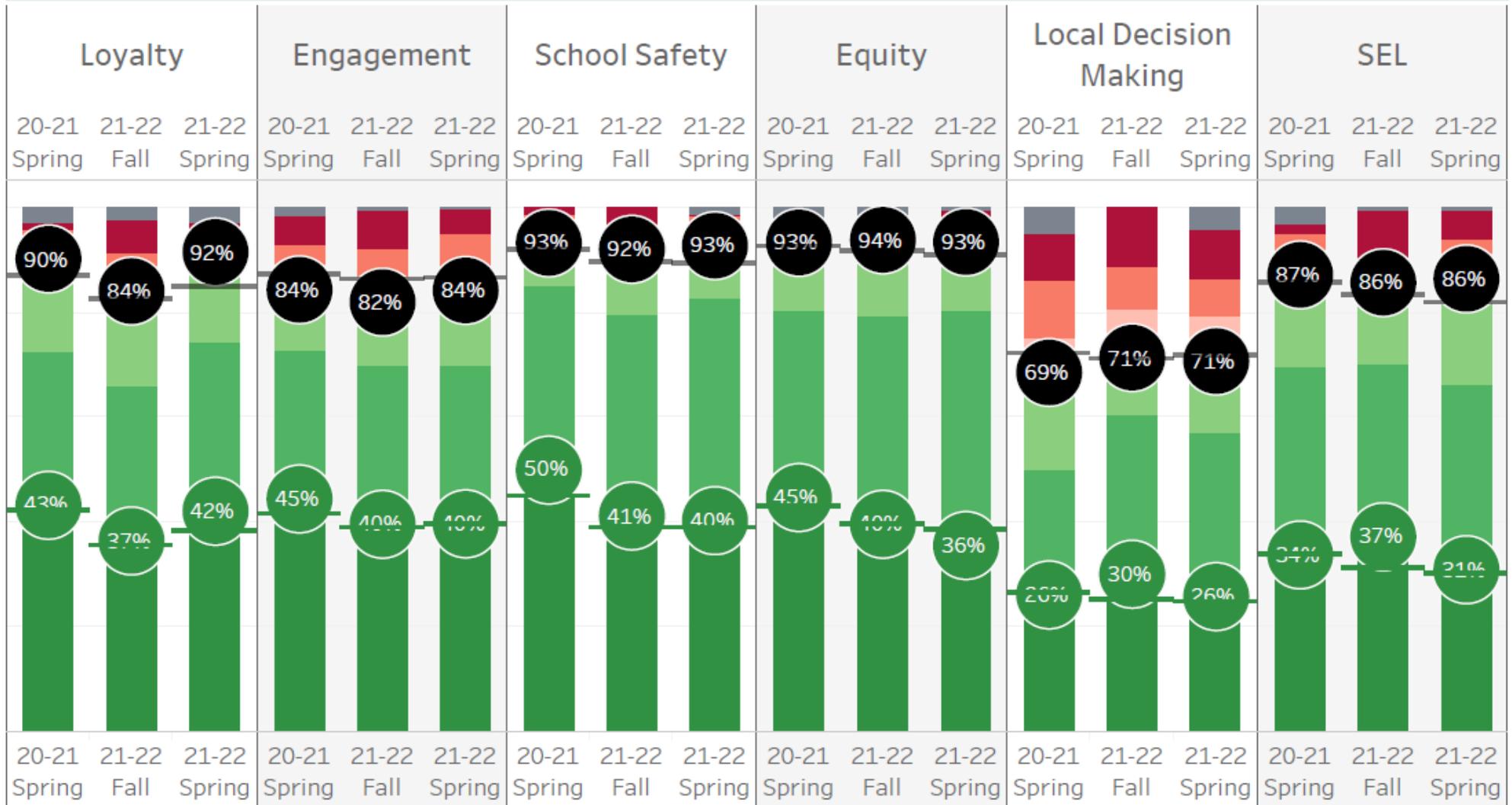
Top Survey Results:

- **Staff: Equity and Loyalty** received the highest levels of satisfaction from the FCCS staff – most agree that the school promotes equity for all and is respectful of different races and cultural backgrounds, they are also happy working at this school.
- **Parents:** the FCCS families have a generally favorable perception of the school, but **Safety** received the highest levels of satisfaction even outpacing the network average. They feel their students are safe at this school.
- **Students: Rigor and Relevance & Equity** received the highest level of satisfaction from the FCCS students – they mostly agree that they use technology to not only learn, but to also collaborate on projects and assignments and their teachers believe in they can learn.

Areas for Improvement:

- **Staff & Parents: Local Decision-Making** continues to receive the lowest levels of satisfaction for both stakeholder groups across the network as well as for the FCCS families and staff. Staff do not feel involved when changes are being made and parents do not feel we involve them with their child's learning goals or the classes/programs their child takes.
- **Students: Engagement** continues to be lowest performing category among the FCCS students. They do not readily talk about ideas from classes outside of school.

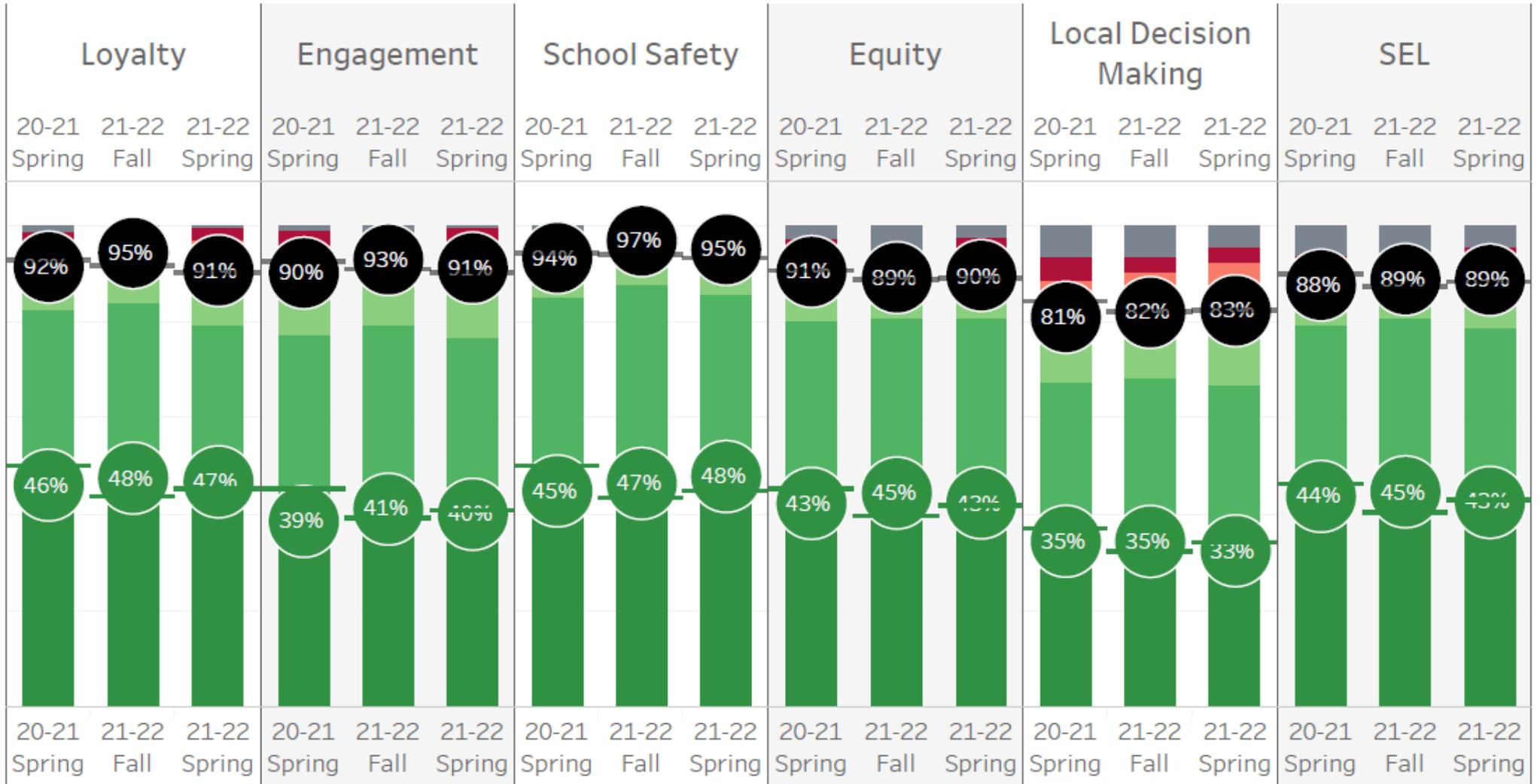
Staff Survey Results



Bar Chart Legend: ■ Strongly Agree | ■ Agree | ■ Somewhat Agree | ■ Somewhat Disagree | ■ Disagree | ■ Strongly Disagree | ■ I do not know

Circle & Line Legend: — Network Total Agree Average | — Network Strongly Agree Average | ● Total Agree | ● Strongly Agree

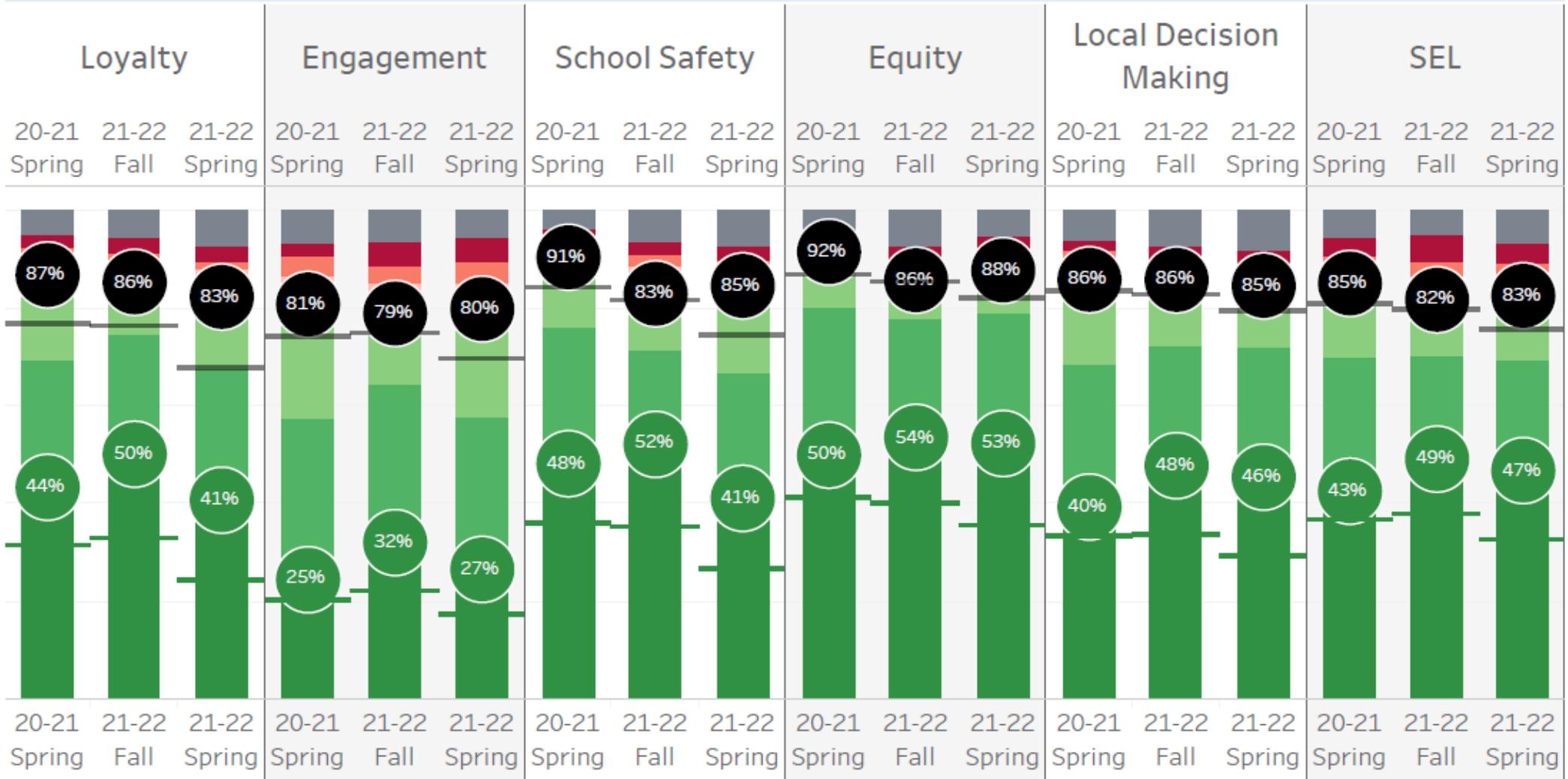
Parent Survey Results



Bar Chart Legend: ■ Strongly Agree | ■ Agree | ■ Somewhat Agree | ■ Somewhat Disagree | ■ Disagree | ■ Strongly Disagree | ■ I do not know

Circle & Line Legend: — Network Total Agree Average | — Network Strongly Agree Average | ● Total Agree | ● Strongly Agree

Student Survey Results



Bar Chart Legend: ■ Strongly Agree | ■ Agree | ■ Somewhat Agree | ■ Somewhat Disagree | ■ Disagree | ■ Strongly Disagree | ■ I do not know

Circle & Line Legend: — Network Total Agree Average | — Network Strongly Agree Average | ● Total Agree | ● Strongly Agree



CSUSA

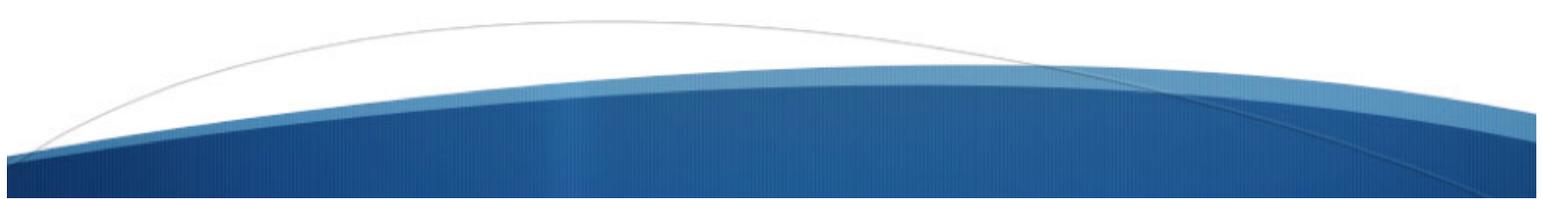
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III. Financials

- Informational
- For Discussion
- For Action

Notes:





Variance Analysis Report - Consolidated

FCCS-Four Corners Charter School

For the Period Ended 6/30/2022

	YTD Actuals	YTD Budget	Variance to Budget		Forecast	Amended Budget	Variance to Budget	
			\$ Change	% Change			\$ Change	% Change
Revenues								
State Sources								
FEFP	\$ 7,651,594	\$ 7,615,813	35,781	0%	\$ 7,651,594	\$ 7,615,813	35,781	0%
Capital Outlay	690,669	692,990	(2,321)	0%	690,669	692,990	(2,321)	0%
Other Revenue Sources								
Other Program Revenues	513,934	604,610	(90,676)	-15%	513,934	604,610	(90,676)	-15%
Interest Income	198	74	124	167%	198	74	124	167%
Special Revenue Sources								
Federal Grants Revenue	607,276	903,693	(296,417)	-33%	607,276	903,693	(296,417)	-33%
State Grants Revenue	20,120	3,848	16,272	423%	20,120	3,848	16,272	423%
Teacher Lead	14,282	-	14,282	-	14,282	-	14,282	-
Total Revenues	\$ 9,498,074	\$ 9,821,028	\$ (322,955)	-3%	\$ 9,498,074	\$ 9,821,028	\$ (322,955)	-3%
Expenses								
Instruction	4,357,176	4,089,625	(267,551)	-7%	4,357,176	4,089,625	(267,551)	-7%
Instruction Support Services	469,823	562,303	92,480	16%	469,823	562,303	92,480	16%
Board	12,123	13,200	1,077	8%	12,123	13,200	1,077	8%
School Administration	642,126	593,098	(49,028)	-8%	642,126	593,098	(49,028)	-8%
Facilities and acquisition	372,400	336,071	(36,329)	-11%	372,400	336,071	(36,329)	-11%
Fiscal Services	572,882	563,877	(9,005)	-2%	572,882	563,877	(9,005)	-2%
Food Services	99	-	(99)	-	99	-	(99)	-
Central Services	94,061	676,212	582,151	86%	94,061	676,212	582,151	86%
Pupil Transportation Services	222,653	226,777	4,124	2%	222,653	226,777	4,124	2%
Operation of Plant	1,914,334	2,054,384	140,050	7%	1,914,334	2,054,384	140,050	7%
Maintenance of Plant	1,143,817	767,478	(376,339)	-49%	1,143,817	767,478	(376,339)	-49%
Community Service	98,770	105,548	6,778	6%	98,770	105,548	6,778	6%
Total Expenses	\$ 9,900,264	\$ 9,988,574	\$ 88,309	1%	\$ 9,900,264	\$ 9,988,574	\$ 88,309	1%
Excess/(Deficit) of Rev over Exp	(402,191)	(167,546)	(234,645)	-	(402,191)	(167,546)	(234,645)	-
Add back Depreciation and Amortization	288,588	248,383	40,205	16%	288,588	248,383	40,205	16%
Net Change in Fund Balance	\$ (113,603)	\$ 80,838	\$ (194,440)	-241%	\$ (113,603)	\$ 80,838	\$ (194,440)	-241%
Enrollment	1,045	1,055	(11)	-1%	1,045	1,055	(11)	-1%
Rate Per Student	\$ 7,326	\$ 7,219	\$ 107	1%	\$ 7,326	\$ 7,219	\$ 107	1%

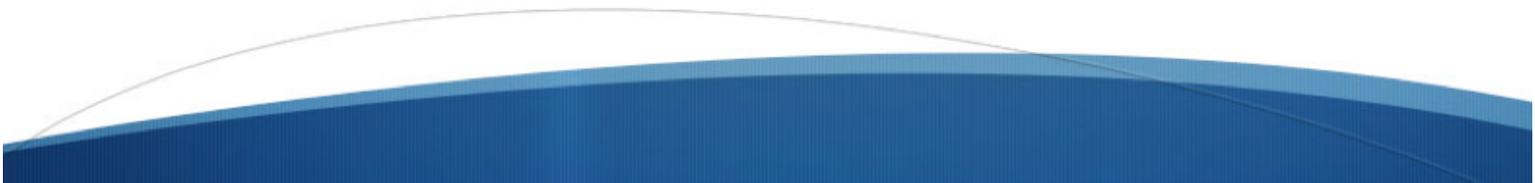
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IV. Old Business

- Informational
- For Discussion
- For Action

Notes:



[GOVERNING BOARD]

POLICY: DISQUALIFICATION LIST OF CERTAIN INDIVIDUALS

EFFECTIVE DATE: _____

On June 21, 2021, Governor DeSantis signed House Bill 131, which amended sections 1001.10, 1001.42, 1001.51, 1002.33, 1002.421, 1006.061, 1012.27, 1012.31, 1012.315, 1012.795, 1012.796, and 1012.797, F.S., with an effective date of July 1, 2021. The law requires the Department of Education to create and maintain a Disqualification List that will be used as a screening tool for charter schools that participate in state scholarships.

This Policy is to ensure the charter school governing board (the “Governing Board”) will comply with the newly created “Disqualification List” which will require employing entities, for purposes of this Policy such as the Governing Board, to both report qualified employees to the list and check the list for ineligible candidates prior to employment. Ineligible candidates would have committed offenses listed in section 1012.315, F.S., or engaged in sexual misconduct with a student. The Policy will also provide a list of definitions, including sexual misconduct, instructions for reporting an individual, removing an individual and executing separation affidavits.

A. Definitions.

a. In this Policy, the terms are defined as follows:

- i. *“Clear and convincing evidence or material”* means evidence relied upon at hearing, or the material or information relied upon in the absence of a hearing, such as videos, witness statements, and admissions, is of such weight and credibility that they produce a firm belief, without hesitancy of a fact;
- ii. *“Conviction”* means an adjudication of guilt by a court, after a determination of guilt by verdict or a plea of guilt; as well as where a person is found guilty, plead guilty or plead nolo contendere and adjudication of guilt is withheld;
- iii. *“Covered position”* means a position held by instructional personnel, administrative personnel and educational support persons, as defined by s. 1012.01(2), (3) and (6), F.S., and as determined by the charter school which may include, but is not limited to, those positions listed in "Exhibit A" attached hereto;
- iv. *“Department”* means the Department of Education;
- v. *“Educator certificate”* means any certificate awarded under s. 1012.55, F.S., and identified in Rule 6A-4.002, F.A.C.;
- vi. *“Employment”* or *“employed”* means any person performing services in a covered position for the charter school school, regardless of whether the person is hired and paid directly by the charter school, or hired and paid through a contract the charter school has with a third party;
- vii. *“Reporting entity”* for purposes of this policy is the charter school governing board

- viii. “*Sexual misconduct with a student*” means any behavior or act, whether physical, verbal or electronic, by a person in a covered position with a prekindergarten through 12th grade student, regardless of the age or consent of the student, which is intended to erotically stimulate either person or which is likely to cause such stimulation. Examples of sexual misconduct with a student may include all of the following conduct:
1. Making lewd or lascivious remarks to a student or performing such acts in the presence of a student;
 2. Kissing a student, intentionally touching a student's breast(s) or sexual organs, regardless of whether the student is clothed;
 3. Sending, providing or exchanging nude or semi-nude pictures with a student or a request for the same; and
 4. Any attempt to engage, or offer to engage, a student in any behavior or act which would constitute sexual misconduct with a student, if completed.

B. The Role of the Governing Board.

- a. The Governing Board will ensure that only persons subject to the Disqualification List are submitted to the Department for placement on the Disqualification List.
- b. The Governing Board shall designate a person, either the (<BOARD TO SELECT POSITION>) responsible for providing information and responding to Department inquiries related to the Disqualification List.

C. Reporting Requirements of the Governing Board.

- a. In order to submit a person for inclusion on the Disqualification List, the Governing Board will issue and maintain a written report adopted in accordance with the procedures set forth herein.
- b. After investigation by the Governing Board, the Governing Board shall cause a final order or written report to be issued by the Governing Board which shall include the following information:
 - i. A determination that the person is ineligible for employment with Governing Board or related entity;
 - ii. The determination is based upon a finding, supported by clear and convincing evidence or material, that the person committed either sexual misconduct with a student, as defined by this Policy, or has been convicted, as defined by this Policy, of one of the crimes listed in s. 1012.315, F.S.; and
 - iii. The sexual misconduct or crime occurred on or after June 1, 2022, while the person was employed by the reporting entity in a covered position.
- c. The Governing Board then, following the issuance of the written report or final order, shall utilize the reporting website provided by the Department at <http://fldoe.org/disqualificationlist> and the report, separate from the written report noted above, shall include the following:
 - i. The name, date of birth and last four numbers of the social security number of the person to be included on the list;

- ii. The date and number of the final order or report;
- iii. The information that must be included in the final order or report as noted herein
- iv. Confirmation that the person was provided written notice of the consequence of placement on the Disqualification List, as set forth in the capitalized language found in this Policy.

D. Procedural Process.

- a. In order to ensure that any person submitted for inclusion on the Disqualification List by Governing Board receives a level of process comparable to persons submitted by a school district, prior to submission of a person for the list, the Governing Board has adopted the following procedures:
 - i. The Governing Board shall provide written notice to the individual that the Governing Board intends to submit the person for inclusion on the Disqualification List at least ten (10) days prior to the submission to the Department;
 - ii. The written notice provided to the individual will include the reason for potential inclusion on the Disqualification list for a reason included in Florida Statutes or Florida Administrative Code.
 - iii. If the individual intends to dispute the intended action by the Governing Board for submission to the Disqualification List, the individual submitted for inclusion on the Disqualification List then has five (5) calendar days to provide a written response (the "Response") to the Governing Board which shall include any and all evidence contrary to the notice provided by the Governing Board. The Response must include all exhibits and/or witness statements in support of the individual's position contrary to the Governing Board's notice as no other evidence will be received by the Governing Board following submission of the Response.
 - iv. Upon receipt of the Response, the Governing Board shall set the matter on the next available Governing Board public agenda for final disposition by the Governing Board (the "Hearing"). The Governing Board will provide written notice to the individual of the opportunity to contest the intended action and the date of the Governing Board. The individual shall be given ten (10) minutes to present its case to the Governing Board, not including the response time to any questions from the Governing Board. The individual will not be permitted to bring any additional witnesses or present any additional evidence not already included in the Response.
 - v. The Hearing shall be presided over by the (<**Governing Board Attorney, Area Director, etc.**>) (the "Presiding Officer") who shall, at the Hearing, disclose any and all conflicts of interest and relationship to the individual. The Presiding Officer shall be a neutral party and the recommendation and determination shall be made by the Presiding Officer for adoption by the Governing Board where the intended action is contested.

- vi. The Governing Board, in accordance with the procedures above, shall issue a written report that includes the information and findings which caused the person to be included on the Disqualification List based upon a finding, supported by clear and convincing evidence or material, that the person committed either sexual misconduct with a student, as defined by this rule, or has been convicted, as defined by this rule, of one of the crimes listed in s. 1012.315, F.S.; and
- vii. ; including any consideration of the Response or evidence presented at the Hearing.
- viii. The Governing Board shall report a person to the Disqualification List within 48 hours of the date when the final order or report is final and filed with the Governing Board.
- ix. The Governing Board will provide written notice to any individual submitted for inclusion on the Disqualification List either by certified mail to the last known address, in person, or via electronic mail of the consequences of inclusion on the list, and shall include the following statement: “ANY PERSON ON THE DISQUALIFICATION LIST MAINTAINED BY THE FLORIDA DEPARTMENT OF EDUCATION UNDER S. 1001.10(4), F.S., MAY NOT SERVE OR APPLY TO SERVE AS AN EMPLOYEE OR CONTRACTED PERSONNEL AT A PUBLIC SCHOOL OR PRIVATE SCHOOL THAT PARTICIPATES IN A STATE SCHOLARSHIP PROGRAM UNDER CHAPTER 1002, F.S. A PERSON WHO KNOWINGLY VIOLATES THIS PROVISION COMMITS A FELONY OF THE THIRD DEGREE, PUNISHABLE AS PROVIDED IN S. 775.082, F.S., OR S. 775.083, F.S.”
- x. The Governing Board shall permanently maintain all records related to the determination to submit a person for inclusion on the Disqualification List.

E. Removal from Disqualification List. The process for submitting, considering and ruling upon a request for removal from the Disqualification List is set forth below.

- a. A request for removal may be submitted by the Governing Board that submitted the person for the list and must:
 - i. Be in writing and submitted to the list accessible at <http://fldoe.org/disqualificationlist>;
 - ii. Identify which paragraph of s. 1001.10(4)(c), F.S., is relied upon for the request for removal and provide details demonstrating the basis of removal;
 - iii. Include a copy of the final order or report which resulted in placement on the list and the current address of the Governing Board; and
 - iv. Include certified or notarized documentary evidence supporting the request.
- b. It is understood by the Governing Board and any individual previously reported to the Disqualification List that removal from the disqualification list is subject to the sole and absolute discretion of the Department.

F. Effective Date.

- a. This policy became effective _____, 2022. The Governing Board reserves the right to change provisions of this Policy at any time in the future.

G. Applicable State Laws

- a. **FLA. STAT. ANN § 1001.10, 1001.42, 1001.51, 1002.33, 1002.421, 1006.061, 1012.27, 1012.31, 1012.315, 1012.795, 1012.796, and 1012.797.**

EXHIBIT A

COVERED EMPLOYEES

1. **INSTRUCTIONAL PERSONNEL.**—“Instructional personnel” means any K-12 staff member whose function includes the provision of direct instructional services to students. Instructional personnel also includes K-12 personnel whose functions provide direct support in the learning process of students. Included in the classification of instructional personnel are the following K-12 personnel:
 - a. *Classroom teachers.*—Classroom teachers are staff members assigned the professional activity of instructing students in courses in classroom situations, including basic instruction, exceptional student education, career education, and adult education, including substitute teachers.
 - b. *Student personnel services.*—Student personnel services include staff members responsible for: advising students with regard to their abilities and aptitudes, educational and occupational opportunities, and personal and social adjustments; providing placement services; performing educational evaluations; and similar functions. Included in this classification are certified school counselors, social workers, career specialists, and school psychologists.
 - c. *Librarians/media specialists.*—Librarians/media specialists are staff members responsible for providing school library media services. These employees are responsible for evaluating, selecting, organizing, and managing media and technology resources, equipment, and related systems; facilitating access to information resources beyond the school; working with teachers to make resources available in the instructional programs; assisting teachers and students in media productions; and instructing students in the location and use of information resources.
 - d. *Other instructional staff.*—Other instructional staff are staff members who are part of the instructional staff but are not classified in one of the categories specified in paragraphs (a)-(c). Included in this classification are primary specialists, learning resource specialists, instructional trainers, adjunct educators certified pursuant to s. [1012.57](#), and similar positions.
 - e. *Education paraprofessionals.*—Education paraprofessionals are individuals who are under the direct supervision of an instructional staff member, aiding the instructional process. Included in this classification are classroom paraprofessionals in regular instruction, exceptional education paraprofessionals, career education paraprofessionals, adult education paraprofessionals, library paraprofessionals, physical education and playground paraprofessionals, and other school-level paraprofessionals.
2. **ADMINISTRATIVE PERSONNEL.**—“Administrative personnel” includes K-12 personnel who perform management activities such as developing broad policies for the governing board and executing those policies through the direction of personnel at all levels within the district. Administrative personnel are generally high-level, responsible personnel who have been assigned the responsibilities of systemwide or schoolwide functions, comparable to positions such as superintendents, assistant superintendents,

deputy superintendents, school principals, assistant principals, career center directors, and others who perform management activities. Broad classifications of K-12 administrative personnel are as follows:

- a. *instructional administrators*.—Included in this classification are persons with administrative or policymaking duties who have broad authority for management policies and general school operations related to the instructional program. Such personnel often report directly to the school superintendent and supervise other administrative employees. This classification includes assistant, associate, or deputy superintendents and directors of major instructional areas, such as curriculum, federal programs such as Title I, specialized instructional program areas such as exceptional student education, career education, and similar areas.
- b. *noninstructional administrators*.—Included in this classification are persons with administrative or policymaking duties who have broad authority for management policies and general school operations related to the noninstructional program. Such personnel often report directly to the governing board and supervise other administrative employees. This classification includes assistant, associate, or deputy superintendents and directors of major noninstructional areas, such as personnel, construction, facilities, transportation, data processing, and finance.
- c. *School administrators*.—Included in this classification are:
 - i. School principals or school directors who are staff members performing the assigned activities as the administrative head of a school and to whom have been delegated responsibility for the coordination and administrative direction of the instructional and noninstructional activities of the school. This classification also includes career center directors.
 - ii. Assistant principals who are staff members assisting the administrative head of the school. This classification also includes assistant principals for curriculum and administration.
- d. EDUCATIONAL SUPPORT EMPLOYEES.—“Educational support employees” means K-12 employees whose job functions are neither administrative nor instructional, yet whose work supports the educational process.
 - i. Other professional staff or nonadministrative/noninstructional employees are staff members who perform professional job functions which are nonadministrative/noninstructional in nature and who are not otherwise classified in this section. Included in this classification are employees such as doctors, nurses, attorneys, certified public accountants, and others appropriate to the classification.

(b) Technicians are individuals whose occupations require a combination of knowledge and manual skill which can be obtained through about 2 years of post-high school education, such as is offered in many career centers and Florida College System institutions, or through equivalent on-the-job training.

(c) Clerical/secretarial workers are individuals whose job requires skills and training in clerical-type work, including activities such as preparing, transcribing, systematizing, or preserving written communications and reports or operating equipment performing those functions. Included in this classification are secretaries, bookkeepers, messengers, and office machine operators.

(d) Skilled crafts workers are individuals who perform jobs which require special manual skill and a thorough and comprehensive knowledge of the processes involved in the work which is

acquired through on-the-job training and experience or through apprenticeship or other formal training programs. Lead workers for the various skilled crafts areas shall be included in this classification.

(e) Service workers are staff members performing a service for which there are no formal qualifications, including those responsible for: cleaning the buildings, school plants, or supporting facilities; maintenance and operation of such equipment as heating and ventilation systems; preserving the security of school property; and keeping the school plant safe for occupancy and use. Lead workers in the various service areas shall be included in this broad classification.



CAC1814921

February 18,2021

Proposal Number:

Four Corners Charter School
9100 Teacher Lane
Davenport, FL 33897
ATTN: Chris Kober
RE: Controls, VAV's, Ex Fans

Subject: (CONTROLS) *Four Corners Charter School - Honeywell WEBs EMS Install ABC Mechanical is pleased to offer the following scope of work for your consideration and approval. ABC is proposing to install a Honeywell N4 WEBs control system. The Honeywell N4 control system is completely web accessible with no need for proprietary third-party software so you can log in and monitor your system using a standard web browser. Through the web interface, you can adjust schedules, run trend reports, check, and respond to alarms and make configuration changes such as adjusting set points. The WEBs controller is open protocol so it can be configured with any standard Tridium engineering tool regardless of branding. In addition, this system offers unparalleled scalability for future upgrades and no moving parts for amazing reliability. The WEB-8100 will be licensed with an embedded workbench so that the engineering tool is contained on the controller.*

(VAV's Boxes and Exhaust Fans) *ABC Mechanical is pleased to quote the following project. Provide labor and materials to replace 82 VAV Boxes and 10 Exhaust Fans for RTU's and replace existing Exhaust Fans. We will be removing some roof top exhaust fans and will be adding exhaust fans to classroom bathrooms to operate off light switches. Exhaust fans that are removed will be capped and electrical terminated.*

(Rooftop Package Units) *Add GPS devices for air filtration for 10 rooftop package units. Replace all (10) chill water vales on AHU's and repair insulation as needed. Provide Test and Balance on all (10) AHU's.*

(Chillers and Pumps) *Provide new chill water isolation valves at the chillers. Replace all pressure differential controls in mechanical room. Provide Test and Balance for chiller plant.*

NOTE: *This project will be proposed as 1 Project, or as Controls, VAV's or by Building. (Controls must be done as 1 project and before VAV's can be replaced.)*

800 Corporate Drive, Suite 124, FT. LAUDERDALE, FL 33334

PHONE: (954) 202-9926 FAX: (954) 416-4029

Invoices: invoices@abc-mechanical.com ; Service: service@abc-mechanical.com



CAC1814921

Total Project Investment: \$688,200.00

Controls Project: \$288,900.00

VAV Project: \$399,300.00

Scope of work will include: Controls

1. Front End Control Panel

- a. Install new 18"x18" control cabinet.
- b. Install enclosed battery backup with BACnet communication for WEB-8100 controller.
- c. Install Honeywell WEB-8100 controller for remote access and Graphical User Interface.
- d. Install (2) BACnet MSTP/TCP-IP routers to support communication between buildings.

2. AHUs (Total of 10)

- a. Demo existing controls and sensors.
- b. Re-use existing controls enclosure.
- c. Install new 75VA 24VAC Transformer with reset.
- d. Install Honeywell Unitary Spyder controller.
- e. Install static pressure transducer in supply duct.
- f. Install discharge temperature sensor in supply air duct.
- g. Install enthalpy sensor in return air duct before outside air influence.
- h. Install Co2 sensors in return duct before outside air influence.
- i. Wire to existing outside air damper actuators.
- j. Wire to existing VFD and include new start/stop relay with HOA switch.
- k. Install CT to read motor current for status indication.
- l. AHU 3-4 only – Install temperature/humidity sensor in Kitchen.
- m. AHU 3-4 only – Install temperature/humidity sensor in Dry Storage.
- n. AHU 3-4 only – Install Glycol Bottle temperature sensor in Walk-In Cooler.
- o. AHU 3-4 only – Install Glycol Bottle temperature sensor in Walk-In Freezer.

3. Chiller Plant

- a. Remove all existing controllers/sensors from chiller plant.
- b. Re-use existing controls enclosure.
- c. Install 100VA 24VAC power supply with 10A breaker and convenience outlet.
- d. Install new NEMA 4 rated chilled water isolation valve actuators on each Chiller (total of 3).
- e. Install new chilled water temperature sensors (Total of 6).

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ABC
MECHANICAL

CAC1814921

- f. Install relays with HOA switches for both pumps and the chillers (Total of 5).
- g. Install analog current sensors on pumps for status indication.
- h. Install outside air temperature/humidity combination sensor.
- i. Wire to existing water flow rate sensors.

4. VAVs (Total of 82)

- a. Remove all controllers/sensor from each VAV.
- b. Install discharge air temperature sensor.
- c. Install space temperature sensor.
- d. Install isolation relays for staged heat units.

5. Exhaust Fans

- a. Install Spyder controller in each building to tie into existing Exhaust Fan relays/CTs (Total of 24).
 - b. Install SIO module in K-5 building due to number of fans.
 - c. Re-use existing fan start/stop relay.
 - d. Re-use existing fan status CT for monitoring.
- 6. Install daisy-chain BACnet communication bus for all controlled devices.
 - 7. Program graphical user interface for system operation/monitoring.
 - 8. Set up unit schedules and set points per customer direction.
 - 9. Set up data trending on designated controller points.
 - 10. Set up alarms for email notification as well as historical trending.
 - 11. Integrate system with Niagara Enterprise server located at CSUSA headquarters in Ft. Lauderdale, FL.
 - 12. Provide 4 hours of customer training on new system usage.

Total Controls Investment: \$288,900.00

Clarifications / Exclusions

- 1.** All work to be performed during normal hours 7:00 AM to 4:00 PM
- 3.** ABC provides a 1-year labor warranty only and assumes no responsibility for any manufactures warranties.
- 4.** ABC not responsible for providing any valves or dampers not specifically called out in this proposal.
- 5.** Customer will be required to provide a static IP address and port forwarding to the new Honeywell Webs- N4 controller for remote access.

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CAC1814921

Scope of work will include: VAV's and Exhaust Fans

Complete VAV Box Project: \$399,300.00

- Provide engineering to size and install new VAV's and Fan Powered Boxes
- Demo (82) existing fan coil units.
- Furnish and install new vav boxes with electric heat. (82)
- Provide labor and materials to disconnect electrical and re-connect electrical to VAV boxes
- Furnish and install GPS filtration devices to existing rooftop AHU's. (10)
- Provide labor and materials to install electrical for air filtration devices.
- Provide labor to materials to install new chill water valves to existing air handler units and chillers. (10)
- Provide labor and materials to install new roof top exhaust fans with dampers.
- Start up and check operation.
- Dispose of 82 VAV boxes properly.

Building 1: Install 19 New VAV Boxes and Exhaust Fans: \$109,319.00

- Demo (19) existing VAV boxes.
- Furnish and install new vav boxes with electric heat. (19)
- Provide labor and materials to disconnect electrical and re-connect electrical to VAV boxes
- Furnish and install GPS filtration devices to existing rooftop AHU's. (2)
- Provide labor and materials to install electrical for air filtration devices.
- Provide labor to materials to install new chill water valves to existing air handler units.
- Provide labor and materials to install new roof top exhaust fans with dampers.
- Start up and check operation.
- Dispose of 19 existing VAV boxes.

Building 2: Install 30 VAV Boxes and Exhaust Fans \$136,503.00

- Demo (30) existing VAV boxes.
- Furnish and install new vav boxes with electric heat. (30)
- Provide labor and materials to disconnect electrical and re-connect electrical to VAV boxes
- Furnish and install GPS filtration devices to existing rooftop AHU's. (4)
- Provide labor and materials to install electrical for air filtration devices.
- Provide labor to materials to install new chill water valves to existing air handler units.
- Provide labor and materials to install new roof top exhaust fans with dampers. (8)

800 Corporate Drive, Suite 124, FT. LAUDERDALE, FL 33334

PHONE: (954) 202-9926 FAX: (954) 416-4029

Invoices: invoices@abc-mechanical.com ; Service: service@abc-mechanical.com



CAC1814921

- Start up and check operation.
- Dispose of 30 existing VAV boxes.

Building 3: Install 33 VAV Boxes and Exhaust Fans \$153,478.00

- Demo (33) existing VAV boxes.
- Furnish and install new vav boxes with electric heat. (33)
- Provide labor and materials to disconnect electrical and re-connect electrical to VAV boxes
- Furnish and install GPS filtration devices to existing rooftop AHU's. (4)
- Provide labor and materials to install electrical for air filtration devices.
- Provide labor to materials to install new chill water valves to existing air handler units.
- Provide labor and materials to install new roof top exhaust fans with dampers.
- Start up and check operation.
- Dispose of 33 existing VAV boxes.

Clarifications / Exclusions

1. All work to be performed during normal hours 7:00 AM to 4:00 PM unless noted.
2. Proposal good for thirty (30) days.
3. ABC not responsible for providing any valves, actuators or dampers not specifically called out in this proposal.

Please call me if you have any questions or would like any additional information. Please sign below and return via fax or email indicating your acceptance.

Accepted by: _____

Date:

Regards:

Ron LaFoy
GENERAL MANAGER
ABC MECHANICAL, LLC
CAC#1814921
561-714-6477

800 Corporate Drive, Suite 124, FT. LAUDERDALE, FL 33334

PHONE: (954) 202-9926 FAX: (954) 416-4029

Invoices: invoices@abc-mechanical.com ; Service: service@abc-mechanical.com



Invoice

#INV-ABCM-5480

7/31/2022

ABC Mechanical
800 Corporate Drive
Suite 124
Fort Lauderdale FL 33334
United States

Bill To

Four Corners Charter School
9100 Teacher Lane
Davenport FL 33837
United States

Ship To

Four Corners Charter School
9100 Teacher Lane
Davenport FL 33837
United States

TOTAL

\$344,100.00

Due Date: 7/31/2022

Terms	Due Date	PO #	Sales Rep	Shipping Method
Due on receipt	7/31/2022			

Quantity	Item	Rate	Amount
1	HVAC PROJECT P2022-10 Total Project Cost		\$688,200.00
1	HVAC PROJECT P2022-10 50% Deposit Paid on CK#100763 INV-ABCM-3854		(\$344,100.00)

Total	\$344,100.00
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INV-ABCM-5480

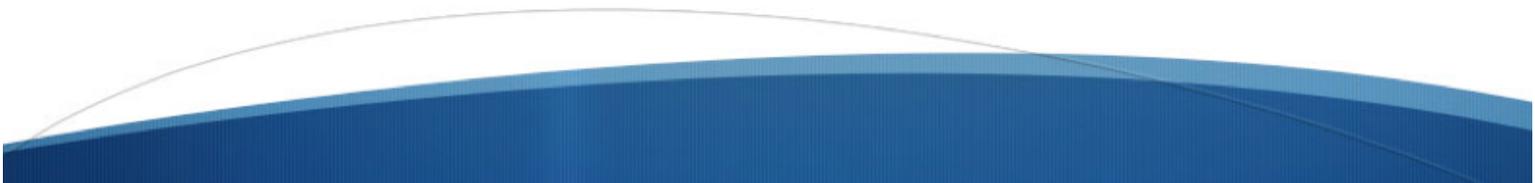
Section Cover Page



V. New Business

- Informational
- For Discussion
- For Action

Notes:



**RESOLUTION BY
THE BOARD OF DIRECTORS OF
FOUR CORNERS CHARTER SCHOOL, INC.**

The undersigned, as the Chairman of the Board Directors of Four Corners Charter School, Inc., a Florida not-for-profit corporation (the “Corporation”), following the holding of a formal meeting and receipt/sending of notice; do hereby waive all formal requirements; and consent in writing to the adoption of the following resolution, taking said action in of the governing board and a meeting of the Directors whereby the Chairman of the Corporation has been given authorization to execute said resolution.

The following Resolutions were duly adopted, and that the same have not in any way been modified or rescinded, but are in full force and effect; and that the said governing board members and/or directors and/or members of the Corporation have duly ratified and affirmed the same in the form hereinafter set forth.

“RESOLVED, that the United States Congress, through action by the U.S. Department of Education (Department) awarded ESSER grants to State educational agencies (SEAs), and established in the Coronavirus Aid, Relief, and Economic Security (CARES) Act, Pub. L. No. 116-136 (March 27, 2020), and further funded under the Coronavirus Response and Relief Supplemental Appropriations (CRRSA) Act, 2021, Pub. L. No. 116-260 (December 27, 2020) and the American Rescue Plan (ARP) Act of 2021, Pub. L. No. 117-2 (March 11, 2021), for the purpose of providing local educational agencies (LEAs) that receive funds under part A of title I of the Elementary and Secondary Education Act of 1965 (ESEA), including charter schools that are LEAs, with emergency relief funds to address the impact the COVID-19 pandemic has had, and continues to have, on elementary and secondary schools across the Nation.

FURTHER RESOLVED, that Section 1002.33(25)(a) & (b), Florida Statutes, provides that “[a] charter school system’s governing board shall be designated a local educational agency for the purpose of receiving federal funds, the same as though the charter school system were a school district, if the governing board of the charter school system has adopted and filed a resolution with its sponsor and the Department of Education in which the governing board of the charter school system accepts the full responsibility for all local education agency requirements.”

FURTHER RESOLVED, that the Corporation, as a charter school system’s governing board in each county as more particularly described in “**Exhibit A**” attached hereto, agree to and shall be designated as a local educational agency for the purpose of receiving federal funds, specifically and only as it relates to the receipt and reimbursement of ESSER funds, the same as though the charter school system were a school district.

FURTHER RESOLVED, that this resolution shall be adopted and filed with the Corporation’s Sponsor in each county where the Corporation operates a charter public school and the Florida Department of Education and the Corporation accepts the full responsibility for all local education agency requirements as it relates to the receipt and reimbursement of ESSER funds.

FURTHER RESOLVED, that the Corporation hereby authorizes the chairperson to execute and sign any and all documents approved by the Corporation's legal counsel necessary to effectuate this resolution."

The action described herein shall be effective as of the _____ day of June, 2022.

IN WITNESS WHEREOF, the undersigned, being Chairman of the Board of Directors of this Corporation, have hereunto set their hands and seals for these purposes.

Four Corners Charter School, Inc.,

Name: _____

Title: _____

EXHIBIT A

I. Osceola

- i. Four Corners Charter School



CSUSA K-12 READING PLAN

2022-2023

Pending

Approval

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Introduction

The reading curriculum for CSUSA Schools is based on a foundation of text exemplars and authentic texts, per the high rigor put forth by the Florida State Standards (including the transition to the new FL BEST standards).¹ CSUSA applies a standards-based approach to reading instruction that focuses on mastery through the use of a Guaranteed and Viable Curriculum (GVC), the core of its education model. The GVC is based on the research of Robert Marzano as published in *What Works in Schools: Translating Research Into Action (2003)* and *The New Art and Science of Teaching (2017)*. The GVC provides all students with equal opportunity to master the standards, and the time in which to reach mastery. The use of the GVC ensures that individual teachers do not have the option to disregard or replace assigned content. Teachers focus individualized reading instruction utilizing CSUSA created curriculum maps, which group and arrange the standards in a logical way to ensure all grade level standards can be taught within the school year. Instruction will incorporate a variety of authentic texts, with a blend of literary and informational texts in all grade levels. As referenced in *Just Read, Florida!* an effective program incorporates a wide range of diverse texts. The research-based curriculum is aligned to the rigor, depth, and intent of the standards and includes a range of diverse print and media. Along with other resources described further in this plan, CSUSA Schools will utilize a core reading resource, SAVVAS MyView Literacy (K-5) and Houghton Mifflin Into Literature (6-12). Core reading programs are augmented with diagnostic assessments, leveled texts, intervention and supplemental resources, as well as various other components to meet the needs of all students. The program provides support in building a strong foundation in reading and utilizing critical thinking skills within the reading activities.

The primary goal of the implementation of the reading curriculum is to teach children to understand what they read, and to become life-long readers through systematic, direct instruction of the Standards aligned to the six components of reading: phonemic awareness, phonics, fluency, vocabulary, comprehension and oral language. CSUSA has incorporated the six components of reading into the GVC, providing curriculum maps with corresponding standards assessments and vocabulary that will assist teachers in systematic instruction of the standards. In the curriculum maps, standards are logically grouped and sequenced, building from simple to more complex skills and taught to mastery, as monitored through formative assessments. Phonemic awareness and phonics skills are scaffolded in blending, segmenting, deleting, and other skills. Research has identified specific skills children must learn in order to read well. According to the Report of the National Reading Panel Teaching Children to Read, the best instructional reading programs include: use of the alphabet (phonemic awareness and phonics), fluency (guided oral reading and independent, silent reading), and comprehension (vocabulary and text comprehension).

Research from *Florida Center for Reading Research* and *Just Read Florida!* will be continually reviewed in order to formulate a research-based reading curriculum based on the needs of the students. CSUSA Schools will implement an ELA block that includes time for all BEST ELA Strands in kindergarten through fifth grades. The ELA block will include whole group instruction and small group instruction utilizing a research-based sequence of reading instruction, with differentiation for specific student learning needs, timely and specific feedback, and high-student engagement to ensure the greatest impact of a full instructional block. There will be instruction for communication/writing, and further vocabulary development, including integration of science and social studies within the ELA block. In addition to the ELA block, there will be an additional block of time dedicated to targeted intervention, remediation or enrichment based on student need, which is aligned with Response to Intervention (RtI), described further in this plan.

No matter the grade level, students in need of additional support will be provided the extra minutes of

¹ A review of the CSUSA Reading Plan for K-12 and guidelines provided by Just Read, Florida! is conducted annually to ensure alignment with current Florida state statute.

support either in a push-in or pull-out setting, possibly within a non-required specials period. Middle and high school grades will follow a similar plan, dependent on course scheduling. If students qualify based on data and assessments, they will receive intensive reading instruction or remedial support.

Research informs us that there is an instructional difference between annual growth for students who are on grade-level and catch-up growth for students that are below or significantly below grade-level (Fielding, Kerr and Rosier 2007). Addressing literacy and reading for those who are multiple years behind grade-level is not a single year process, in fact, it is only after 2-3 years of comprehensive reading instruction of more than 200 minutes per day that students begin to cross the threshold of grade-level performance (50th percentile). With this in mind CSUSA Schools intend to provide extended instructional minutes to students below grade level through extended-day learning opportunities, remediation, additional tutoring, and in-school interventions.

Table 1.1 below describes a sample progression plan to increase instructional minutes in reading in grades K-5.

Table 1.1

Sample Progression Plan of Instructional Reading Minutes Grades K-5		
On Grade Level Instructional Plan	Strategic Instructional Plan	Intensive Instructional Plan
90-minute uninterrupted reading block	90 minute uninterrupted reading block	90-minute uninterrupted reading block
30-minute additional block for ELA instruction	30-minute additional block for ELA instruction	30-minute additional block for ELA instruction
	30-minute Remediation/ Enrichment block	30-minute Remediation/ Enrichment block
		30-minute intervention block
		60-minute tutoring session (3 x/week)

K-5 Remediation/Enrichment

Students receive targeted instruction in core reading classes during a specific time block. Students are grouped based on their various levels of performance on grade-level standards. The groups are adjusted accordingly based on formative assessment data to ensure students continuously receive personalized instruction. For example, students that are below grade level may receive remedial instruction focused on foundation or comprehension skills, while novel studies or vocabulary application may be the focus for students on grade level. Students above grade level may be participating in an enrichment block where they are incorporating critical thinking and project-based learning to enhance their levels of understanding.

K-5 Intervention

Students who have been identified as having substantial reading deficiencies, as defined by [FL Rule 6A-6.053](#), receive targeted, intensive instruction during a specific intervention time block. They are grouped based on their various levels of performance within the domains of reading and are instructed based on those targeted skill gaps. The groups are adjusted accordingly based on screening, diagnostic and progress-monitoring data to ensure students continuously get the support they need.

The following table provides an example of an elementary schedule beginning with a remediation/enrichment block, a core integrated ELA block, and a separate block for intervention. See the school addendums for individual schools' schedules.

Table 1.2

Sample Elementary Schedule	
Time	Monday – Friday Schedule
8:00 am – 8:40 am	Remediation/Enrichment Block
8:40 am – 10:10 am	ELA Block – 90 Minutes Uninterrupted Reading Instruction
10:10 am – 10:40 am	Additional ELA Block - Integrated Social Studies and Science Content
10:40 am -11:10 am	Intervention Block
11:10 am – 11:40 am	Lunch
11:40 pm – 12:25 pm	Specials
12:25 pm – 12:55 pm	Guided PE
12:55 pm – 2:25 pm	Mathematics
2:25 pm – 3:00 pm	Science/Social Studies Experiential Block

6-12 Intervention

In middle and high school, students who need remediation as determined by their performance on state and interim assessments will receive intensive instruction through intensive reading support during a double ELA block, a push-in/pull out model or a separate intensive reading course, in addition to their scheduled English Language Arts course. Students are grouped based on their various levels of performance and targeted skill gaps. Throughout the class, groups are adjusted based on formative and progress monitoring data to ensure students continuously get the support they need. Research-based instructional strategies for intervention, such as guided reading (Fountas & Pinnell, 2003, 2013), close reading (Fisher & Frey, 2014) and literature circles (Marzano, Pickering & Pollack, 2001; Daniels, 2002; Langer, 2002; Barone & Barone, 2012; Helgeson, 2017) will be included.

Descriptions of the programs and resources used for intervention will be explained in detail further in Attachment A. Individual schools are not limited to the resources listed in this attachment. The resources used by the individual schools can be found in the school addendums.

Table 2.1 that follows, aligned with Response to Intervention (RTI) described further in this plan, describes the progression plan to increase reading instructional minutes in grades 6-12 to ensure that students achieve mastery of grade level expectations.

Table 2.1

Progression Plan of Instructional Reading Minutes 6-12		
On Grade Level Instructional Plan	Strategic Instructional Plan	Intensive Instructional Plan
50-102 minute integrated Reading/ELA block	50-102 minute integrated Reading/ELA block	50-102 minute integrated Reading/ELA block
	50-minute intensive reading class (OR) intensive scaffolded support in reading during a double block/remediation block (OR) intensive scaffolded support in reading during a push-in/pull-out model	50-minute intensive reading class (OR) intensive scaffolded support in reading during a double block/ remediation block (OR) intensive scaffolded support in reading during a push-in/pull-out model
		30-minute intervention sessions
		60-minute tutoring session

Table 2.2 and Table 2.3 provide examples of middle school schedules including intensive reading instruction. Both examples include a double block of integrated reading/ELA instruction.

Table 2.2

Sample Middle School Schedule w/ Separate Intensive Course		
Period	Time	Subject
	8:00 am – 8:24 am	Homeroom/Advisory
1	8:26 am – 9:16 am	Integrated Reading/ELA
2	9:18 am – 10:08 am	Integrated Reading/ELA
3	10:10 am – 11:00 am	Math
4	11:02 am – 11:52 am	Intensive Reading
5	11:54 am – 12:44 pm	Science
	12:46 pm – 1:16 pm	Lunch
6	1:18 pm – 2:08 pm	World History
7	2:10 pm – 3:00 pm	PE
	3:00 pm	Dismissal

Table 2.3

Sample Middle School Schedule w/o Separate Intensive Course		
Period	Time	Subject
	8:00 am – 8:24 am	Homeroom/Advisory
1	8:26 am – 9:16 am	Integrated Reading/ELA
2	9:18 am – 10:08 am	Integrated Reading/ELA (option for interventions through push-in model)
3	10:10 am – 11:00 am	Math
4	11:02 am – 11:52 am	Creative Writing (option for interventions through push-in model)
5	11:54 am – 12:44 pm	Science
	12:46 pm – 1:16 pm	Lunch
6	1:18 pm – 2:08 pm	World History
7	2:10 pm – 3:00 pm	PE
	3:00 pm	Dismissal

The Comprehensive Core Reading Program (CCRP)

The Comprehensive Core Reading Plan (CCRP) is the basis of reading instruction provided to all students at all levels as a critical component of the GVC. SAVVAS MyView Literacy (K-5) is the state approved core-reading program for kindergarten through fifth grade. It is a comprehensive, research-based program, which provides for the implementation of an integrated approach, and supports the creation of a strong reading foundation required for the development of literacy skills needed for the success of 21st century learners. It correlates to the BEST standards across all grade levels, and addresses the six areas of reading: phonological awareness, phonics, fluency, vocabulary, comprehension, and oral language. It also provides for explicit, systematic instruction, guided reading, and ample practice opportunities which allow students to master necessary reading skills. This research-based instructional approach is provided during the uninterrupted 90-minute reading block, and will incorporate a variety of authentic texts, with a blend of literary and informational texts in all grade levels. This combination of short stories, novels, non-fiction texts, poetry, and drama will prepare the student for real-life reading application. Text exemplars provide exposure to more complex text to challenge the students, allowing them to reach higher standards of success. The literature and non-fiction texts, supplemented with exemplar texts, suggested in the curriculum maps, are to be used for close, analytic reads.

A portion of the block will consist of teachers providing the designated reading lesson for the day, and the remainder of the time will be differentiated for students to receive targeted small-group instruction or complete independent activities tailored to practice necessary reading skills from the lesson. Small-group instruction and corrective feedback will be provided, and independent work will be monitored. Teachers will use texts and materials at the student's instructional level, and progress to more complex text as necessary.

HMH Into Literature, a comprehensive English Language Arts program with an integrated reading and writing approach, will be utilized in grades 6-12. The program correlates to the BEST standards for all grade levels and contains multiple resources that include a reading focus. For example, resources such as an interactive work text, The Close Reader, is provided for close reading as are digital tools to enhance students' ability to analyze and identify critical information within a variety of rigorous text structures. Into Literature can also be utilized to facilitate Guided Reading, which research shows to be an effective strategy for proficient reading (Fountas & Pinnell, 1996, 2003, 2013). Additionally, Into Literature includes vast supplemental novels for the use of book studies and Literature Circles, a research-proven effective reading instructional strategy (Daniels, 2002; Langer, 2002; Marzano, Pickering & Pollack, 2001; Barone & Barone, 2012; Helgeson, 2017).

Supplemental Intervention Reading Program (SIRP)

Based on benchmark, interim and formative assessment data, students will receive additional instruction and practice on identified skills. Teachers will provide additional instruction outside of the 90-minute reading block in times such as the RtI block, through content area integration, during enrichment activities, and during any other opportunity to support student achievement of individual learning goals. Programs, resources and assessments used during SIRP are described in detail in Attachment A. Individual schools are not limited to the resources listed in Attachment A. The resources used by the individual schools can be found in the school addendums.

Comprehensive Intervention Reading Programs (CIRP)

CSUSA Schools will meet the individual needs of students who, based on diagnostic data, have been identified to have significant skill deficiencies and/or read one or more years below grade level. Students will receive additional instruction outside of the 90-minute reading block and the SIRP interventions through the use of an evidence-based intervention program in a small-group setting. These students will receive more frequent progress monitoring to ensure accelerated progress toward grade level expectations. Students will not be pulled out of core subjects for this additional reading instruction. For example, the comprehensive reading instruction could occur during dedicated intervention times, an extension of an ELA block, or during non-required electives. Programs, resources, and assessments used during CIRP are described in Attachment A. Individual schools are not limited to the resources listed in the school addendums.

Response to Intervention

CSUSA Schools will use a Response to Intervention model based on a Multi-Tiered System of Supports (MTSS) to provide high quality instruction and interventions matched to the needs of each individual student. This model is aligned with all federal and state laws to ensure all students make appropriate learning gains. Each student's performance will drive future instructional decisions. This will be in place for all students in need of reading intervention, including students who have previously been identified as meeting Exceptional Student Education (ESE) eligibility requirements, students with 504 plans, and English Language Learners (ELL). Students with IEPs qualify for Tier 2 and Tier 3 services in the same manner as all other students, in addition to any services and accommodations that they are already receiving through their IEP. CSUSA Schools will follow the district's guidelines for 1011.62(9), F.S., and FL Rule 6A-6.053, where all students in grades kindergarten through 12 requiring Tier III intensive reading interventions will be taught by a teacher who is certified or endorsed in reading.

The RtI model includes:

- Tier 1 – Standards-Based Classroom Learning. All students participate in general education learning that includes: universal screenings to target groups in need of specific instructional and/or behavioral support and implementation of the Florida Standards (BEST) and NGSSS. This is implemented through standards-based classroom structure, differentiation of instruction, flexible grouping, progress monitoring, formative assessments, and positive behavior supports.
- Tier 2 – Needs-Based Learning. In addition to Tier 1, targeted students participate in standard intervention protocol processes for identifying and providing evidence-based interventions based on student need, on-going progress monitoring to measure student response to intervention and guided decision-making. Instruction occurs in small-groups in addition to the time allotted for core instruction.
- Tier 3 – SST-Driven Learning. In addition to Tier 1 and Tier 2, targeted students participate in intensive, formalized problem solving to identify individual student needs; targeted evidence-based interventions tailored to individual needs; evidence-based curriculum resources; frequent progress monitoring; and analysis of student response to intervention(s). The time spent on instruction for Tier 3 students is in addition to the combined Tier 1 and Tier 2 amounts.

See Addendum for a draft of a Reading Intervention Process and Procedures Manual for CSUSA Schools.

CSUSA Schools ensure that behavior does not impact the reading acquisition process. Through a collaborative problem-solving model, the multi-disciplinary team, which may include school counselor, teacher, curriculum resource teacher, administrator will systematically review performance data of all students and identify interventions as needed to improve student performance. This team will work with teachers on implementation of these interventions with fidelity and progress monitoring. The team will meet regularly to discuss how to better enable learning for students at each of the three intervention tiers.

CSUSA Schools will offer ELL students instructional services through a Mainstream/Inclusion English Language Arts and Mainstream/Inclusion for Core/Basic subject areas model. Sheltered instruction may be offered to students in grades 6 –12 as needed via English Through ESOL and Developmental Language Arts Through ESOL. Mainstream/inclusion instruction provided to ELL students will be equal in amount, sequence, and scope to the instruction provided to the non-ELL students at the same grade levels. ACCESS Can Do Descriptors will be used as a tool to help differentiate instruction, according to what the student should be able to do based on the student’s stage of English language proficiency. Instruction will be supported through the use of differentiated ESOL instructional strategies, accommodations, materials, and assessments, which are monitored by the ELL committee and documented in lesson plans. The effectiveness of these ESOL strategies will be determined by the teachers’ observations, administrative classroom walk-throughs, data chats, and site visits. In addition, the curriculum, textbooks, and other instructional materials used by ELL students will be comparable to those used by their non-ELL counterparts. Supplemental text and materials will also be provided as needed for language acquisition and reading instruction.

ESOL components are included within the SAVVAS MyView Literacy (K-5) reading program, such as leveled texts, to supplement the lesson and provide differentiated support to ELL students. All students, including ELL students, who are performing below grade level will be referred to the RtI process. Interventions that will be provided include push-in/pull-out support and small-group instruction. Progress Monitoring Plans (PMP) will be created for all students, including ELL students, to properly document types and frequency of interventions. The ESOL coordinator will take part in monitoring these PMPs to ensure ELLs are making adequate progress based on performance of class and benchmark assessments. The state required assessment, ACCESS for ELLs, will be administered as appropriate.

Students in CSUSA Schools who have been identified and qualify for a Gifted Education Program, each have an Educational Plan (EP). The schools’ gifted teachers work collaboratively with the instructional team to support the students in the achievement of their EP goals. Strategies utilized will allow students to be academically challenged and will focus on higher-order thinking skills. The team works together to review student data and identify enrichment areas which may be targeted through differentiated instruction. Through differentiated activities, gifted students’ studies may encompass holistic projects that include components such as the development of advanced research skills, complex creative thinking and problem-solving, communication skills for a variety of audiences, and use of technology to promote the desire for learning on self-selected and/or teacher-selected topics.

Between diagnostic and interim assessment periods, teachers will administer a variety of assessments to students in need of intervention, or to those who are not responding to interventions. The norm-based Northwest Education Association (NWEA) assessment or other comparable assessments are used as the universal screenings for all grade levels, K-10 to determine student need for intervention. For the complete breakdown of diagnostic tools used and frequency of assessment during the RtI process, see Assessment section beginning on page 15.

All elements of progress monitoring will be shared with parents through the report card and data conferences, conducted throughout the year. Parents will have the option to schedule conferences as

needed with the teacher. This connection between home and school will enhance students' ability to achieve annual progress.

Reading Program Specifications

In order to make reading a "primary focus," all objectives from the *Just Read Florida!* Reading Program Specifications that follow will be implemented at CSUSA Schools.

Specification 1: Professional Development

- Comprehensive Initial Professional Development
- Professional Development for Everyone
- Frequent and Continuous Professional Development
- Professional Development to Impact Change
- Professional Development Led by School-site Expertise

CSUSA Schools will provide professional development for all teachers through the model of continuous improvement. All teachers will be provided research-based professional development targeted on school improvement goals. Teachers will meet in professional learning communities weekly by grade level teams, facilitated by their team leads, to analyze student data and design units and accompanying lessons. Additionally, team leads participate in monthly leadership meetings with administrators. Based on administrative/support walk-throughs, site visit feedback, and student performance, teachers will be provided specific, differentiated professional development from mentor teachers, administrators, curriculum specialists, or curriculum resource teachers (CRTs). At least one CRT will be on staff at all CSUSA Schools, and a regional curriculum specialist will be assigned for support. Professional development will be provided at least monthly, in addition to weekly grade level meetings, and on designated teacher professional development days. Teachers will meet for data chats with mentor teachers and administrators, after benchmark assessment periods, to analyze student reading progress, and develop an action plan for professional development. These data chats can include reading intervention strategies, teaching reading in content areas, and many other literacy development opportunities. Professional development will have an emphasis on dyslexia, multisensory interventions and explicit instructional approaches. The transition to Florida's BEST Standards will also be an area of focus for professional development and PLCs. A sample professional development agenda is shown in Table 3 that follows. In addition to the following network-wide plan, see the school addendums for individual schools' customized professional development plans.

Table 3

Sample Professional Development Agenda	
Curriculum Mapping Unit Instructional Focus Assessment Resources Lesson Planning Accommodations	8:30-10:00
Break	10:00-10:15
Data Analysis Data Tracking Small Group Instruction	10:15-11:45
Break	11:45-1:00
Instructional Software Usage Analysis Progress Analysis Lesson Planning Implications	1:00-2:00
Wrap Up	2:00-2:30
Work Session	2:30-4:00

In preparation for their highly supportive roles within CSUSA Schools, CRTs attend training workshops each year to further professional knowledge on how to best serve CSUSA Schools. In order to facilitate professional development to the teachers throughout the year, CRTs attend Curriculum Cadres and webinars provided by curriculum specialists.

Principals and Assistant Principals have their own professional development institutes over the summer to prepare for the coming year, with regard to best practices, new regulations, and any other expectation within their roles. Principals and Assistant Principals attend meetings to receive support within their positions.

CSUSA also has a professional development plan for New Teacher Induction (NTI) prior to orientation at the school level. Additional opportunities for NTI will be provided throughout the year as teachers are hired. Returning teachers receive at least one full week of professional development prior to the start of the new school year for Returning Teacher Orientation (RTO). These two-week trainings are provided by CSUSA, and are facilitated by Curriculum Specialists, site-based administrators, and Curriculum Resource Teachers. During the first days of NTI/RTO, all teachers new to the school will receive comprehensive training that ensures their understanding and implementation of the GVC. In subsequent days, all teachers will receive training based on the Marzano works, *What Works in Schools: Translating Research into Action (2003)*, and *Classroom Instruction That Works: Research-Based Strategies for Increasing Student Achievement (2001)*. This professional development will support all areas of reading instruction, including the use of targeted instruction, differentiated instruction, formative and summative assessments, tracking and monitoring progress, and working with special needs students such as ELL and students with disabilities.

Teachers have to complete required coursework to obtain proper ESOL endorsement, as well as follow state guidelines for professional certificate renewal. In addition, teachers and administrators are encouraged to exemplify the commitment to lifelong learning, by seeking professional development outside of the requirements of CSUSA Schools.

Professional development based on reading instructional software programs occurs throughout the year. Both CSUSA and the individual software companies provide these trainings. Training formats include face-to-face, train-the-trainer, network wide webinars and continuous follow up visits and support. Trainings are also provided by core textbook publishers throughout the year on appropriate, new uses of resources, including ways to best utilize provided materials to reach struggling readers.

Specification 2: Administrative Practices in Support of Reading

- 2.1 Reading as a School-wide Priority
- 2.2 In-service and Evaluation Processes Focused on Reading
- 2.3 Resource Focus on Reading Achievement

School leaders will set high expectations for student achievement in reading and will develop a culture of excellence with a focus on reading. The frequent administrative/support walk-throughs and site visit feedback will be targeted to track teachers' mastery of high-probability, research-based instructional strategies. These measures ensure that teachers implement the reading plan with fidelity and that resources are allocated and used to deliver the strongest impact on student achievement in reading.

High-quality reading programs and materials will continuously be chosen to meet the needs of students. Feedback from teachers can be gathered at each biweekly data chat, as well as from results from each interim assessment and benchmark assessment provided by the Northwest Evaluation Association (NWEA) or other comparable assessments to evaluate the effectiveness of each chosen instructional program. These assessments are described further in this plan. Classroom libraries will be supplemented by the purchase of novels and other fiction and nonfiction texts for students to read within classroom instruction, as well as for personal reading pleasure, to increase motivation and foster a love for reading in students. The Curriculum Resource Teacher will collaborate with the reading and content area teachers to create text sets or collections of books around a topic of inquiry at varying levels of complexity. If an individual school has received a Title I designation, there also could be additional resources and personnel, such as a reading coach, to assist with the selection of materials.

The principal will clearly articulate the vision, mission, and expectations that all children can read, and assist in establishing reading as a priority. Schools may support reading as a priority by spearheading a Reading Challenge in which all students will be expected to read a specific number of books at their independent level throughout the year.

Table 4 below provides CSUSA guidelines for the number of books that may be read by each student:

Table 4

Sample Reading Challenge Goals	
Grade Level	Number of Books
Kindergarten	100
1 st - 5 th Grade	50
6 th - 12 th Grade	30
Number of Books by Pages	
Grade Level K – 2 picture books K- 2 chapter books	# of Pages = 1 Book 1 book
3 rd – 5 th grade	50 pages
6 th – 12 th	75 pages 100 pages
Number of Articles	
Grade Level	# of Articles = 1 Book
K - 2nd	articles
3 rd – 5 th	articles
6 th – 12 th	5 articles
Reading Plus Instructional Software Program	
3 combos = 1 book	

Teachers can monitor students’ independent reading, and check for comprehension in a variety of ways including, but not limited to, student created illustrations, summaries, and verbal explanations. Progress toward the school-wide goal will be tracked and celebrated on hallway or classroom displays. This challenge will also provide for a home-school connection with reading, in addition to their regular daily homework assignments from core courses. Parents will be required to sign a reading log or tracking system to monitor students’ independent reading at home. Parents can facilitate deeper understanding of texts by being the “teacher” at home, asking their children questions about what they are reading and providing support for any book reports or projects that may need to be completed. Students are encouraged to use their local library or borrow from the leveled classroom libraries in order to fulfill the reading challenge guidelines. Students may have the opportunity to use tablets or e-readers as well.

Staff members may also participate in a similar reading challenge. This can further promote CSUSA Schools’ vision of creating the desire for students to be life-long learners as teachers will be role models, demonstrating their love for learning through reading.

CSUSA Schools may also have a Literacy Committee or Reading Leadership Team in order to develop programs and activities that will promote reading throughout the school.

Specification 3: High Quality Reading Instruction is a Dynamic System

- 3.1 Propels Student Learning in Essential Reading Components
- 3.2 Expends Efficient Use of Instructional Time
- 3.3 Contains Systematic Set of Assessment Practices
- 3.4 Differentiated Instruction

Essential Reading Components

The six components of reading will be taught explicitly with structured practice to ensure mastery. Speaking and listening skills is an essential component of literacy. Expressive and receptive oral language skills will be provided throughout the English Language Arts instructional block. Opportunities for students in all grades will be provided to engage in developmentally appropriate collaborative partner, small group and whole class discussions. These discussions will include vocabulary development, guided practice, demonstrating understanding by summarizing and retelling, reporting on topics and relating key details of stories in a logical fashion, presentations and picture chats.

Phonemic awareness skills, such as phoneme blending and phoneme deletion, will be scaffolded beginning with simpler phonemes, and building to more complex phonemes. Phonics skills and decoding strategies will be taught systematically and sequentially so that students understand how letters represent sounds and sounds blend together to make words that contain meaning. The curriculum supports students enhancing their phonics skills within their writing. In addition to explicit whole group instruction, these skills are further mastered through small group instruction, centers, and cooperative learning activities.

Teachers will provide fluency instruction on three levels of text: high frequency word fluency, phrase fluency, and text fluency. Students will set individual goals for fluency, and teachers will track progress toward achievement through regular fluency assessments.

To build academic vocabulary, teachers will choose the most important vocabulary words to teach, and following a six-step process to teach new words so that students develop a deep understanding of the word (Marzano). Students are first provided a description or example of the word (verbally and in non-linguistic form). Students then restate this description in their own words, and also create a picture or symbol to represent the word. Students interact with this new word in various higher-order activities throughout the week, as well as with each other. They may also participate in games with the word for further motivation and connections.

Reading process and literary analysis skills will be taught through direct instruction of content cluster skills, and modeling of metacognitive, comprehension strategies (Keene and Harvey & Goudvis). This is supported through guided reading with leveled texts. By providing direct, systematic instruction for all six components of reading, CSUSA Schools will ensure that all students achieve annual growth in reading.

Using an integrated approach, writing will be a part of all content areas. Included in this approach will be elements from direct skill instruction and the process-oriented methodology including frequent opportunities for students to engage in, and apply specific skills in a variety of communication activities. Additionally, writing skills will be strengthened across the curriculum through responding to text and the use of writing strategies such as, planning, revising, editing, peer review and collaboration. Furthermore, text production and process writing approaches will be incorporated. Technology, such as word processing will be utilized as support.

Efficient Use of Instructional Time

In order to maximize instructional time, teachers are requested to map out their lessons minute-by-minute. This ensures for “bell-to-bell” instruction, with research-based strategies implemented to engage students within learning the entire time. These lesson plans are approved by administrators and implemented with fidelity throughout the year. With administrative approval, teachers may adjust their plans as the year progresses to best fit the needs of students. These minutes are posted in the classroom for all students, as well as visitors, to see. This makes all stakeholders aware of what is happening in the classroom, and assists with appropriate instructional pacing.

Teachers are also expected to map out their lesson plans in a very structured, research-based manner, following the guidelines of using an introduction, modeling, guided practice, independent practice, and closure within every lesson and every subject.

Reading processes and literary analysis skills will be taught through direct instruction of content cluster skills and by modeling of metacognitive comprehension strategies (Keene and Harvey & Goudvis). This is supported through guided reading with leveled texts. Students will have access to leveled readings and activities in targeted small groups and centers used for individualized instruction and practice. Highly qualified teachers will appropriately group students by level and differentiate instruction targeted to particular groups’ needs through scaffolded, guided reading lessons. Additionally, instructional software, which adapts to student’s individual needs will be used.

Students move into independent practice when they have proven they have understood the concept, and the purpose is to master the objective. During this time, teachers can work with small-groups, and focus on targeted instruction using research-based strategies such as Guided Reading, and implement differentiated and skill-specific centers. This allows teachers to provide extra assistance to those who are not ready to move on to the independent practice stage and hone in on particular deficiencies. Lastly, a closure activity is conducted, whether it is in the form of an exit-slip, or turn-and-talk response, in order to gauge final understanding of the concept taught within the lesson. This effective use of instructional time plan applies to all subject areas, not just reading. For those students who are in need of extra instructional time and support, see the sample schedules provided.

Assessment

At the beginning of every school year, teachers will analyze previous year’s state assessment scores and identify each student’s reading level through a variety of assessments. Examples of assessments that may be available for CSUSA Schools are shown in Table 5.1 below. See the school addendums for specific progress monitoring assessments used at individual schools and Attachment B for an overview of CSUSA assessments and reports.

Table 5.1

Grades K-2 Sample Reading Assessments		
Category	Assessment	Frequency
Screening	NWEA MAP Growth; STAR; iReady or comparable assessments	Up to 3 times a year
Diagnostic	iReady; DIBELS; Fountas & Pinnell Benchmark Assessment System	1-3 times a year
Progress Monitoring	Fountas & Pinnell Benchmark Assessment System; STAR; Easy CBM; iReady, Other tools based on school programs	Minimum of every 3-4 sessions within a 6-8-week intervention cycle
Outcome Measures	NWEA MAP Growth; Easy CBM, State Assessments, Instructional Focus Assessments	Range: by unit → 3 times a year

Table 5.2

Grades 3-5 Sample Reading Assessments		
Category	Assessment	Frequency
Screening	NWEA MAP Growth; DIBELS; iReady	Up to 3 times a year
Diagnostic	iReady; DIBELS; DAR; Fountas & Pinnell Benchmark Assessment System	1- 3 times a year
Progress Monitoring	Fountas & Pinnell Benchmark Assessment System; FAST/Cambium; Easy CBM; iReady; STAR; DIBELS; Other tools based on school programs	Minimum of every 3-4 sessions within a 6-8-week intervention cycle.
Outcome Measures	NWEA MAP Growth; Easy CBM, State Assessments, Instructional Focus Assessments	Range: by unit → 3 times a year

Table 5.3

Grades 6-12 Sample Reading Assessments		
Category	Assessment	Frequency
Screening	NWEA MAP Growth; iReady (6 th - 8 th)	Up to 3 times a year
Diagnostic	DIBELS (6 th Grade); DAR; iReady (6 th - 8 th); Fountas & Pinnell Benchmark Assessment System	1-3 times a year
Progress Monitoring	Easy CBM; Fountas & Pinnell Benchmark Assessment System; FAST/Cambium (6-10); iReady (6 th - 8 th); Other tools based on school programs	Minimum of every 3-4 sessions within a 6-8-week intervention cycle.
Outcome Measures	NWEA MAP Growth; Easy CBM; State Assessments, Instructional Focus Assessments	Range: by unit → 3 times a year

In addition to the assessments above, fluency assessments such as oral reading fluency checks using scaffolded discussion templates, will provide data regarding reading level progress. For those students with disabilities for whom participation in the regular state assessments has been deemed not appropriate per their Individualized Education Plans, alternative options will be provided per the Florida state guidelines. CSUSA Schools will be in compliance with all guidelines and requirements, including assessments for students with Individual Education Plans and English Language Learners. For those third grade students who do not meet standardized testing passing requirements, CSUSA Schools will utilize state approved alternative assessments for good cause promotion. Teachers will administer formative and summative standard based assessments that are designed to evaluate whether a student has mastered a specific standard at the lowest level that was taught. Each assessment will measure the academic performance of each student on a particular standard, based on content that has been introduced and practiced multiple times.

NWEA MAP Growth, or a comparable assessment, may be administered three times per year, as well as interim assessments will provide data regarding progress toward the state-mandated assessment, and are described as follows:

- NWEA Interim Formative Assessments - The Northwest Evaluation Association (NWEA) MAP Growth assessments are nationally normed, and proven to be effective at targeting student achievement and determining skills students need to improve performance. NWEA uses a scale score (RIT) that continues through each grade level, which enables us to monitor growth from one grade level to the next, as well as determine exactly how far above or how far below grade level a student is. NWEA currently provides the Measures of Academic Progress (MAP). These assessments are adaptive and computer-based, which help prepare students for the format of the state assessments as well. NWEA MAP tests students with engaging, ability-appropriate content. NWEA is an adaptive assessment; therefore, as a student responds to questions, the test difficulty adjusts to the level of the student.

Assessments are followed by a decision-making process to determine the next action to take to meet students' needs. Teachers use data from NWEA MAP, interim assessments, and class assessments to drive the decision-making process with regard to differentiated instruction. This decision making includes re-teaching, changing the instructional strategies, or modifying the developed product to demonstrate understanding. Student groupings will change in classes periodically depending on the activity level and ability level. Teachers will integrate formative assessments throughout activities to make adjustments. Continuously assessing, reflecting, and adjusting content, process, and product enables teachers to best meet the needs of each individual student.

For students receiving targeted intervention, for example those receiving Tier 2 or Tier 3 support, the decision-making process will be more formal. After every 3-4 intervention sessions there will be an analysis of the progress monitoring to determine the success of the intervention. After 6-8-weeks there will be a meeting to analyze the data to determine if the student needs to continue with the intervention, if the intervention needs to be modified, or if the student has met their goals and no longer needs the intervention. Time frames may be adjusted based on LEA guidelines.

Differentiated Instruction

CSUSA Schools will follow the belief that differentiated instruction includes:

- A teacher's response to student needs
- The recognition of students' varying background knowledge and preferences
- Student-centered instruction that addresses students' differences
- A blend of whole-group and small-group instruction.

Research states that teachers can differentiate in various ways: with the content students are learning; the process or environment in which the material is being taught; and the product that is developed to demonstrate learning. Teachers will take into consideration the students' readiness for learning, their interest, and their learning profiles.

Research-based best practices with regard to differentiating include:

- For student readiness: focusing on the standard for the content being taught and the objective that must be mastered, but content may be at various levels (i.e. students may read higher-level text yet still master the same standard as students reading on-level text).
- For student interest: allowing students to choose from a list of options of how they will demonstrate mastery (i.e. some students may complete a project, whereas others might write an essay).
- For student learning profile: addressing various individual student differences in learning styles (i.e. students that are tactile learners can use manipulatives, whereas students who are visual learners can use pictures).

Using assessments describe previously in the plan, students will be assessed at the beginning of the school year to determine basic reading development and to detect the presence of any difficulty. Based on the instructional implications of the diagnostic screening, students will be provided instruction to meet their individual needs with an emphasis on cooperative learning and small group instruction. Cooperative groups are flexible based on progress monitoring of reading skills. The reading lesson segments can incorporate differentiated texts—for on-level, advanced, below-level, and ELL students. Teachers will utilize various rigorous and standards-based center resources to engage students in reading activities to deepen their understanding of reading skills through hands-on activities, the use of manipulatives (i.e. word sorts, letter tiles, and dry erase boards), and integration of technology (i.e. listening centers, Reading Plus).

To further enhance learning for those students who are higher-level, including gifted learners, CSUSA Schools will emphasize using higher-order thinking skills and higher-order tasks to challenge the students. These tasks are utilized as students master concepts and deepen their understanding, and ultimately will benefit all levels of learners. The activities are to enrich college-ready skills, such as problem-solving, critical thinking, synthesizing, analysis, connections, creativity, metacognition, evaluation of decision-making, and transferring knowledge. Not only can these be applied within the reading program, but also across all content areas. Examples of higher-order activities that can be utilized include, but are not limited to:

- Cooperative learning groups
- Student-created artifacts
- Cross-curricular projects
- Inductive learning
- Real-world application projects
- Circle of knowledge
- Evaluations and Critiques
- Research projects
- Debates
- Mock trials

Specification 4: Reading Text Materials and Resources

- 4.1 Materials Aligned with Student Reading Levels
- 4.2 Comprehensive Instructional Materials
- 4.3 Wide Assortment of Diverse Text
- 4.4 Flexible Use of Text
- 4.5 Appropriate Use of Technology

The Comprehensive Core Reading Plan (CCRP) Materials: CSUSA Schools will use SAVVAS MyView Literacy (K-5) and Houghton Mifflin Harcourt Into Literature (6-12). As all reading resources are consistently reviewed and evaluated, this choices may change in the future if new, more effective, research-based resources are determined. As stated previously, these proposed program includes a range of diverse print and media aligned with the Florida's BEST Standards. Within the programs there are diagnostic assessments, leveled texts, intervention and supplemental resources, as well as various other components to meet the needs of all students.

Accompanying instructional materials such as workshop kits, decodable books, and leveled guided reading sets will be used for differentiated instruction during the K-5 90-minute reading block, and during the regularly scheduled double block of middle school ELA as illustrated on the sample student schedules in this document. This integrated reading and ELA block will infuse reading instruction for all students through the use of research-based strategies such as close reading experiences and novel studies with the use of exemplar texts. The increase in complexity will be accomplished by exposing students to authentic texts. Classroom libraries and/or digital libraries are also available to meet the diverse needs of students' reading levels and cultural backgrounds. Students will have the opportunity to utilize these resources at school and at home.

Supplemental Intervention Reading Program (SIRP) Materials

CSUSA Schools will meet the individual needs of students during the school day, by the adding to the 90-minutes of core reading instruction through the Supplemental Intervention Reading Program. Based on classroom and benchmark data, students will receive additional instruction and practice on identified skills. Teachers will provide additional instruction outside of the 90-minute reading block in times such as the RtI block, through content area integration, during enrichment activities, and any other opportunity, to support student achievement of individual learning goals. A comprehensive list of programs, materials and resources for SIRP is detailed in Attachment A. See the school addendums for the list of resources utilized by individual schools, along with descriptions of how the programs are implemented. Individual schools are not limited to the resources listed in Attachment A. CSUSA is dedicated to increase the resources and materials used to support SIRP at the 6-12 grade levels.

Comprehensive Intervention Reading Programs (CIRP) Materials: CSUSA Schools will meet the individual needs of students who, based on diagnostic data, have been identified to have significant skill deficiencies, and/or read one or more years below grade level, these students will be given additional instructional minutes using an evidence-based intervention program. In addition to SIRP intervention, students will receive this additional instruction outside of the regularly scheduled reading block, in a small-group setting, with more frequent progress monitoring, to ensure accelerated progress toward grade level expectations. Various materials and strategies will be utilized to aid those students needing extra support in meeting and exceeding a year's worth of learning. A comprehensive list of programs, materials and resources for CIRP is detailed in Attachment A. See the school addendums for the list of resources utilized by individual schools, along with descriptions of how the programs are implemented. Individual schools are not limited to the resources listed in Attachment A. CSUSA is dedicated to increase the resources and materials used to support CIRP at the 6-12 grade levels.

Attachment C demonstrates a sample of the decision-making process through which students are identified for strategic or intensive support. For students who have not responded to a specific reading intervention delivered with fidelity and with the initial intensity (time and group size) provided, reading intervention instruction and/or materials will be changed based on student data. Also, reflected in Attachment C are examples of materials that may be utilized during the intervention process. Listed materials will be utilized as the resource, such as FCRR, for research-based reading acquisition strategies. When students are not responding to an intervention their supports are increased, and/or the intervention being used is changed. Assessment and progress monitoring is continued in order to determine and target the deficiency.

Use of Technology and Digital Materials

A primary focus of CSUSA Schools is utilizing technology as an effective way to increase student engagement and interaction with learning, as well as for real-world application. CSUSA Schools will do the same and leverage many digital curriculum assets to enhance the offerings for remediation, enrichment and direct classroom instruction. The goal of technology usage is to create an interactive classroom, taking technology out of the hands of the teachers and place it within the hands of students, for an optimal experiential learning environment. Teachers will be trained to integrate technology into the student-learning environment to increase academic achievement for each student.

With the integration of technology, all students will have targeted access to curricular resources, assessment, technology-based intervention, and enrichment enhancing differentiation. Teachers and students will have technology integrated in the classroom through a variety of modalities. For students, this may include:

- Flat screen televisions with interactive tablets
- SMART/Interactive Panel Boards
- Laptop computers
- Computer labs
- Tablets
- Document cameras
- Production room

CSUSA Schools will utilize digital texts and materials in addition to the traditional texts used in schools. All of the textbook programs used will have a digital book component for both school and home. CSUSA Schools will work to build a partnership with a local library as well to obtain more access to digital content. Materials will consistently be reviewed and updated based on impact on student achievement, with digital texts as a priority to meet student needs.

Pending Board Approval

Attachment A

Evidence-Based Intervention Resources, Programs, and Materials

Examples of Evidence-Based Assessments

Additional evidence-based assessments may be used at the individual school level.

Name of Assessment	Type of Assessment	Frequency
NWEA MAP Growth (K-12)	Screening/ Diagnostic	up to 3 times per year
Fountas and Pinnell Benchmark Assessment System (K-5)	Screening, Diagnostic and/or Progress Monitoring	up to 3 times per year
STAR Earrly Literacy/Reading State Assessments (K-2)	Screening	3 times per year
MyView (K-5)	Screening/ Diagnostic	Ongoing, as needed
DIBELS (through 6 th grade)	Diagnostic	Ongoing, as needed
Easy CBM (K-12)	Progress Monitoring	Ongoing, as needed
FAST Progress Monitoring (3-10)	Progress Monitoring	2 times per year, plus summative FAST
DAR (K-12)	Diagnostic	Ongoing, as needed
i-Ready (K-8)	Screening/ Diagnostic	1 to 3 times per year

Examples of Evidence-Based Intervention Resources, Programs, and Materials

Additional evidence-based programs, resources and materials may be used at the individual school level.

Resources/ Program	Grade Level	Phonics	Phonemic Awareness	Fluency	Comprehension	Vocabulary	Oral Language
Leveled Literacy Intervention (LLI)	K-12	x	x	x	x	x	x (K-2)
Lexia Core 5	K-5	x	x	x	x	x	x
Lexia Power Up	6-12		x	x	x	x	
Foundations	K-3	x	x	x	x	x	
i-Ready	K-8	x	x		x	x	
Reading Plus	3-12			x	x		
Reading Horizons	4-12			x	x	x	x
Phonics for Reading	2-6	x	x	x			
Intensive Reading	MS Course	x	x	x	x	x	x
Edgenuity MyPath	6-12				x	x	
STARI	6-8			x	x		
FCRR	K-12	x	x	x	x	x	x
Scholastic Reading Kits	K-5	x	x	x	x	x	x
Exact Path	K-12	x	x	x	x	x	x
Spire	1-8	x	x	x	x	x	x

*See school specific addendums for details.

Attachment B

CSUSA Assessment and Data Reference Sheet

NWEA – Northwestern Evaluation Association

Name	Description
MAP (Measures of Academic Progress) Growth	<ul style="list-style-type: none"> • Administered up to three times annually • Grades 2-5, 6-10, 11-12 students that retake a reading course • Computer-based, Adaptive • Data: RIT score, student’s instructional level • K-2 Test includes audio support (for K-1 and non-reading 2nd grade students)
MAP for Reading Fluency (Optional)	<ul style="list-style-type: none"> • Leverages speech recognition technology and automatic scoring to measure oral reading fluency, reading comprehension, and foundational reading skills – and delivers immediate results to teachers
Surveys	<ul style="list-style-type: none"> • Grades 2+ • Used to test students outside of the testing window • Not a replacement for MAP assessments • Cannot be used in growth calculations (not enough questions) • Computer-based, Adaptive • Data: RIT score • Limited questions and reporting (no goal area RIT scores)
Skills Checklists	<ul style="list-style-type: none"> • Grades K and 1 • Skill specific assessments for early literacy and numeracy • 28 Math Checklists, 10 ELA Checklists • Does not replace MAP
Kindergarten Screener	<ul style="list-style-type: none"> • Pre-screener for incoming Kindergarteners • 30 questions each (early literacy and early numeracy) • Does not replace MAP

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Teacher Level Reports	
Name	Notes
Class Report	<ul style="list-style-type: none"> • Mean & median class RIT • Goal area performance RIT • Student percentile rankings • Lexile range (Reading MAP only) • National and district comparisons
Class Breakdown	<ul style="list-style-type: none"> • Student groupings by 10-point RIT bands • Student groupings by subject and goal area • Direct access to Learning Continuum
Achievement Status and Growth*	<ul style="list-style-type: none"> • Student growth projections • Student status and growth percentiles • Growth projection attainment • Percent of students who met growth projection • Percentage of overall RIT met • Quadrant graphs of student status and growth percentiles • National and district comparisons
Student Progress	<ul style="list-style-type: none"> • Student and parent friendly summary report of student
Student Profile Report	<ul style="list-style-type: none"> • student learning continuum • goal setting per subject area and projected student proficiency performance • Historical data over time • National and district comparisons
Learning Continuum	<ul style="list-style-type: none"> • Skills students are ready to learn, reinforce and introduce • Organized by RIT band, subject, goal area and sub-goal area • Can be grouped and filtered by grade, standard and topic
MPG Class Report	<ul style="list-style-type: none"> • Skills Checklist and Kindergarten Screener results per class • Class summary information provided
MPG Student Report	<ul style="list-style-type: none"> • Skills Checklist and Kindergarten Screener results per student

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School Level Reports	
Name	Notes
District Summary	<ul style="list-style-type: none"> • Grade level achievement on MAP assessments • Historical results by test • Mean RIT, Median RIT and Goal Area Mean RIT • Only available after window closes. Prior to closed window pull ASG by grade pool
Student Growth Summary*	<ul style="list-style-type: none"> • Grade level growth projection and performance on MAP assessments by subject for a specified testing season • Grade level mean RIT, growth projections • % of students in a grade level who met growth projection • Grade level status and growth percentiles • Only available after window closes. Prior to closed window pull ASG by grade pool
Projected Proficiency Summary	<ul style="list-style-type: none"> • Reading • Math • ACT
Grade Report	<ul style="list-style-type: none"> • Mean & median grade level RIT • Goal area performance grade level RIT • Student Percentile Rankings • Lexile Range • National and district comparisons

Progress Learning

Assessments	
Standards-Based Instructional Focus Assessments (IFAs)	<ul style="list-style-type: none"> • Grades K-12 • Standards assessed according to the pacing of the CSUSA Curriculum Maps • Aligned to Florida Standards (BEST) • Computer based
Supplemental Benchmark Assessments	<ul style="list-style-type: none"> • Select priority courses • Standards-based and cumulative • Administered 1-3 times per year
Teacher Created Formative Assessments	<ul style="list-style-type: none"> • Florida standards (BEST) aligned item bank • Computer based

Fountas & Pinnell Benchmark Assessment System

- Mandatory for all Kindergarten and 1st graders as well as any low performing 2nd graders (additional students/grade levels may be tested as the school deems necessary)
- Administered a minimum of 3 times per year, consistent with NWEA testing windows
- One-on-one reading assessment using Fountas & Pinnell Benchmark Assessment System
- Areas Assessed: accuracy, comprehension, self-correction, fluency (optional: writing about reading)
- Teacher identifies student's independent and instructional reading level

Pending Board Approval

Reading Intervention Decision Tree

Pending Board Approval

Incremental

Description	One-Time Costs	Annual Expense (Savings)	Total
Purchase of 3 buses	135,000		135,000
2 Drivers' wages		93,500	93,500
Insurance for 2 buses		9,000	9,000
Fuel for 2 buses		18,000	18,000
Maintenance for 3 buses	20,000	5,000	25,000
Elimination of 2 A&S routes		(137,000)	(137,000)
Total	155,000	(11,500)	143,500

All-In

Description	FY23 Budget	Proposal + Existing	Variance
Purchase of 3 buses	-	135,000	(135,000)
Drivers' wages	50,646	144,146	(93,500)
Insurance	-	13,500	(13,500)
Fuel	7,700	25,700	(18,000)
Maintenance	-	25,000	(25,000)
A&S bus service	342,218	137,556	204,662
Total	400,564	480,902	(80,339)



Instructional Personnel Evaluation System



Purpose

The purpose of this document is to provide the district with a template for its instructional personnel evaluation system that addresses the requirements of Section 1012.34, Florida Statutes (F.S.), and Rule 6A-5.030, Florida Administrative Code (F.A.C.). This template, Form IEST-2017, is incorporated by reference in Rule 6A-5.030, F.A.C., effective April 2018.

Instructions

Each of the sections within the evaluation system template provides specific directions but does not limit the amount of space or information that can be added to fit the needs of the district. Where documentation or evidence is required, copies of the source documents (e.g., rubrics, policies and procedures, observation instruments) shall be provided at the end of the document as appendices in accordance with the Table of Contents.

Before submitting, ensure the document is titled and paginated.

Submission

Upon completion, the district shall email this form and any required supporting documentation as a Microsoft Word document for submission to DistrictEvalSysEQ@fldoe.org.

Modifications to an approved evaluation system may be made by the district at any time. Substantial revisions shall be submitted for approval, in accordance with Rule 6A-5.030(3), F.A.C. The entire template shall be sent for the approval process.

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Part I: Evaluation System Overview

In Part I, the district shall describe the purpose and provide a high-level summary of the instructional personnel evaluation system.

The Charter Schools USA Instructional Evaluation System is a comprehensive, multi-component assessment of a teacher's instructional practice and professional growth, and the academic growth of their students. Instructional practice and professional growth have the largest impact on a teacher's score (55%) with Student performance (growth) accounting for 45% of the final evaluation.

Part II: Evaluation System Requirements

In Part II, the district shall provide assurance that its instructional personnel evaluation system meets each requirement established in section 1012.34, F.S., below by checking the respective box. School districts should be prepared to provide evidence of these assurances upon request.

System Framework

- The evaluation system framework is based on sound educational principles and contemporary research in effective educational practices.
- The observation instrument(s) to be used for classroom teachers include indicators based on each of the Florida Educator Accomplished Practices (FEAPs) adopted by the State Board of Education.
- The observation instrument(s) to be used for non-classroom instructional personnel include indicators based on each of the FEAPs, and may include specific job expectations related to student support.

Training

- The district provides training programs and has processes that ensure
 - Employees subject to an evaluation system are informed of the evaluation criteria, data sources, methodologies, and procedures associated with the evaluation before the evaluation takes place; and
 - Individuals with evaluation responsibilities and those who provide input toward evaluations understand the proper use of the evaluation criteria and procedures.

Data Inclusion and Reporting

- The district provides instructional personnel the opportunity to review their class rosters for accuracy and to correct any mistakes.
- The district school superintendent annually reports accurate class rosters for the purpose of calculating district and statewide student performance, and the evaluation results of instructional personnel.
- The district may provide opportunities for parents to provide input into performance evaluations, when the district determines such input is appropriate.

Evaluation Procedures

- The district's system ensures all instructional personnel, classroom and non-classroom, are evaluated at least once a year.
- The district's system ensures all newly hired classroom teachers are observed and evaluated at least twice in the first year of teaching in the district. Each evaluation must include indicators of student performance; instructional practice; and any other indicators of performance, if applicable.
- The district's system identifies teaching fields for which special evaluation procedures or criteria are necessary, if applicable.
- The district's evaluation procedures comply with the following statutory requirements in accordance with section 1012.34, F.S.:
 - The evaluator must be the individual responsible for supervising the employee; the evaluator may consider input from other personnel trained on the evaluation system.
 - The evaluator must provide timely feedback to the employee that supports the improvement of professional skills.
 - The evaluator must submit a written report to the employee no later than 10 days after the evaluation takes place.
 - The evaluator must discuss the written evaluation report with the employee.
 - The employee shall have the right to initiate a written response to the evaluation and the response shall become a permanent attachment to his or her personnel file.
 - The evaluator must submit a written report of the evaluation to the district school superintendent for the purpose of reviewing the employee's contract.
 - The evaluator may amend an evaluation based upon assessment data from the current school year if the data becomes available within 90 days of the end of the school year.

Use of Results

- The district has procedures for how evaluation results will be used to inform the
 - Planning of professional development; and
 - Development of school and district improvement plans.
- The district's system ensures instructional personnel who have been evaluated as less than effective are required to participate in specific professional development programs, pursuant to section 1012.98(10), F.S.

Notifications

- The district has procedures for the notification of unsatisfactory performance that comply with the requirements outlined in Section 1012.34(4), F.S.
- The district school superintendent shall annually notify the Department of Education of any instructional personnel who
 - Receive two consecutive unsatisfactory evaluation ratings; or
 - Are given written notice by the district of intent to terminate or not renew their employment, as outlined in section 1012.34(5), F.S.

District Self-Monitoring

- The district has a process for monitoring implementation of its evaluation system that enables it to determine the following:
 - Compliance with the requirements of section 1012.34, F.S., and Rule 6A-5.030, F.A.C.;
 - Evaluators' understanding of the proper use of evaluation criteria and procedures, including evaluator accuracy and inter-rater reliability;
 - Evaluators provide necessary and timely feedback to employees being evaluated;
 - Evaluators follow district policies and procedures in the implementation of evaluation system(s);
 - Use of evaluation data to identify individual professional development; and,
 - Use of evaluation data to inform school and district improvement plans.

Part III: Evaluation Procedures

In Part III, the district shall provide the following information regarding the observation and evaluation of instructional personnel. The following tables are provided for convenience and may be customized to accommodate local evaluation procedures.

- Pursuant to section 1012.34(3)(b), F.S., all personnel must be fully informed of the criteria, data sources, methodologies, and procedures associated with the evaluation process before the evaluation takes place. In the table below, describe when and how the following instructional personnel groups are informed of the criteria, data sources, methodologies, and procedures associated with the evaluation process: classroom teachers, non-classroom teachers, newly hired classroom teachers, and teachers hired after the beginning of the school year.

Instructional Personnel Group	When Personnel are Informed	Method(s) of Informing
Classroom and Non-Classroom Teachers	Returning Teacher Orientation (RTO) – 1 week prior to school starting	Face to face delivery of materials and content, virtual, on demand training, handouts, emails and on-site professional development.
Newly Hired Classroom Teachers	New Teacher Induction (NTI) – 2-3 weeks prior to school starting	Face to face delivery of materials and content, virtual, on demand training, handouts, emails and on-site professional development.
Late Hires	Mid-year NTI and/or New Teacher Onboarding – within 90 days of hire date	Face to face delivery of materials and content, virtual, on demand training, handouts, emails and on-site professional development.

- Pursuant to section 1012.34(3)(a), F.S., an observation must be conducted for each employee at least once a year, except that a classroom teacher who is newly hired by the district school board must be observed at least twice in the first year of teaching in the school district. In the table below, describe when and how many observations take place for the following instructional personnel groups: classroom teachers, non-classroom teachers, newly hired classroom teachers, and teachers hired after the beginning of the school year.

Number of Observations	When Observations Occur	When Observation Results are Communicated to Personnel
All Classroom and Non-Classroom Instructional staff members, hired before or after the beginning of the school year		
Frequency can range from weekly to a minimum of quarterly.	Frequency of non-evaluative observations is differentiated by teacher needs, as determined by deliberate practice plans, student data and other informal observations.	Immediately in the online evaluation platform.

- Pursuant to section 1012.34(3)(a), F.S., a performance evaluation must be conducted for each employee at least once a year, except that a classroom teacher who is newly hired by the district school board must be evaluated at least twice in the first year of teaching in the

school district. In the table below, describe when and how many summative evaluations are conducted for the following instructional personnel groups: classroom teachers, non-classroom teachers, newly hired classroom teachers, and teachers hired after the beginning of the school year.

Instructional Personnel Group	Number of Evaluations	When Evaluations Occur	When Evaluation Results are Communicated to Personnel
For all Classroom and Non-Classroom Instructional Staff Members			
Teachers returning to the building from the prior year	1	End-Year evaluation: Annually in the spring of each year prior to the last day of school	End-Year evaluation: In one-on-one conferences between staff member and the school leadership team, prior to the end of the school year.
All new teachers to the profession, state of Florida, Charter Schools USA and/or the school building. <i>*This is also encouraged when buildings have a new leader</i>	2	Baseline evaluation: Prior to January 20 th or within a 90-day period from hire date, whichever is later. End-Year evaluation: Annually in the spring of each year prior to the last day of school.	Baseline evaluation: In one-on-one conferences between staff member and the school leadership team. End-Year evaluation: : In one-on-one conferences between staff member and the school leadership team.

Part IV: Evaluation Criteria

A. Instructional Practice

In this section, the district shall provide the following information regarding the instructional practice data that will be included for instructional personnel evaluations.

1. Pursuant to section 1012.34(3)(a)2., F.S., at least one-third of the evaluation must be based upon instructional practice. At **Charter Schools USA**, instructional practice accounts for **55%** of the instructional personnel performance evaluation.
2. Description of the step-by-step calculation for determining the instructional practice rating for classroom and non-classroom instructional personnel, including cut points for differentiating performance.

The instructional practice component of the IES, 55% of the final evaluation, is comprised of two tools; the Teacher Feedback and Evaluation Tool (35%) and a teacher's Deliberate Practice Plan (20%).

The TFET – Evaluating core effective practices and instructional strategies

Evaluative and non-evaluative versions of the Teacher Feedback and Evaluation Tool (TFET) are based on the research of Robert J. Marzano, with connections to the Florida Educator

Accomplished Practices (FEAPs), and the State of Florida-adopted Marzano Evaluation Model. Specifically, the research base for the TFET includes:

- Marzano, Robert J. *What Works in Schools: Translating Research into Action*. Arlington, Virginia: Association for Supervision and Curriculum Development, 2003, 2013.
- Marzano, Robert J. *The Art and Science of Teaching*. Arlington, Virginia: Association for Supervision and Curriculum Development, 2007.
- Marzano, Robert J. et.al. *Classroom Instruction that Works: Research-Based Strategies for Increasing Student Achievement*. Upper Saddle River, New Jersey: Prentice Hall, 2004.
- Marzano, Robert J. et.al. *Classroom Management That Works: Research-Based Strategies for Every Teacher*. Upper Saddle River, New Jersey: Prentice Hall, 2008.
- Marzano, Robert J. *Classroom Assessment & Grading that Work*. Arlington, Virginia: Association for Supervision and Curriculum Development, 2006.

The TFET is first organized by nine domains that incorporate strategies and behaviors observed both inside and outside of the classroom. Additionally, it supports Charter Schools USA's (CSUSA) continuous improvement framework which balances both traditional educational priorities as well as the unique challenges of charter schools. Talent Development is one of nine Strategic Priority areas that work cohesively to drive student success, the outcome core to CSUSA schools. These priority areas, working in tandem, ensure that the energies, abilities, and specific knowledge of all employees throughout the school and the organization are focused on improving the quality of services required to increase student academic performance and foster student learning.

Student Success (All segments of **Inside the Classroom**, and **Planning and Preparing**) constitutes 76% or, a majority, of the TFET. In its entirety, the TFET will be used as an annual evaluative assessment of classroom and non-classroom¹ full time instructional staff member performance and will constitute **35%** of the final summative evaluation. The TFET will also be chunked into smaller non-evaluative segments (see below) to be used throughout the year to provide ongoing instructor feedback and inform the planning of professional development and the development of school and CSUSA-wide improvement plans (rule 6A-5.030.(3).(d).1.d). The TFET informs teachers and school leaders on appropriate deliberate practice goals, please see the **Deliberate Practice Plan** section below.

Segments and weighting of the TFET (evaluative weighting):

Domain	Indicators	Weight
Well-Managed Learning Environment	3	9%
Equitable Learning Environment	5	15%
High Expectations Learning Environment	2	6%
Supportive Learning Environment	3	9%
Active Learning Environment	3	9%
Progress Monitoring & Feedback Learning Environment	2	6%
Planning & Preparing Learning Environment	4	12%
Data-Driven Instruction Learning Environment	3	10%

¹ For non-classroom teachers, school leaders will use their discretion as to which elements apply and how, to a teacher's unique role in the building. Elements will be eliminated entirely in the most extreme circumstances.

Operational Performance	8	24%
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- **Inside of the Classroom (76%)**
 - Well-Managed Learning Environment
 - Equitable Learning Environment
 - High Expectations Environment
 - Supportive Learning Environment
 - Active Learning Environment
 - Progress Monitoring and Feedback
 - Planning and Preparing Learning Environment
 - Data-driven Instruction Learning Environment
- **Outside of the Classroom (24%)**
Operational Performance

To ensure the integrity of the system and inter-rater reliability, all evaluators will utilize a common rubric, participate in professional development, and use a common core of effective practices.

The alignment outlined above will be used for both evaluative and non-evaluative observations ensuring consistent, clear, and specific feedback to teachers throughout the year and on their end-year evaluative TFET.

Scoring the TFET (Final)

The process to assign a final TFET score and rating is as follows:

- **Step 1:** Rate observed elements at each of the following levels: Innovating (4), Applying (3), Developing (2), Beginning (1), Not Using (0) or Not Observed (no value given).
- **Step 2: Average the indicator scores for each domain.**
- **Step 3:** Calculate the weighted average of the 9 TFET domain scores and place the resulting score on the TFET scale below. Please see **Segments and weighting of the TFET** above.

The final TFET rating scale is as follows:

Highly Effective	Effective	Needs Improvement/ Developing	Unsatisfactory
3.5 – 4.0	2.5 – 3.49	1.5 – 2.49	1.0 – 1.49

All observation results will be calculated electronically via the School's instructional improvement system, a process that will be overseen by the School's management company's Human Resources Department, and with final approval by the School's principal. The TFETs final rating scale is designed to maintain a high level of rigor in instructional practice. The scale used for the final combined evaluation is more aligned with state staff evaluation trends. Additional details of the evaluation process and evaluation protocols can be found below in sections 5 and 6.

DPP – Deliberate Practice Plan: Instructional staff professional goals setting

The deliberate practice score is the second element in the instructional practice component of the Teacher Evaluation System and will account for 20% of a teacher’s final rating.

All teachers will identify three TFET indicators to focus on and develop throughout the year. Each selected element will become a goal in the teacher’s Deliberate Practice Plan (DPP). The DPP will be created, reviewed and monitored collaboratively with the school leadership team.

The school leadership team evaluates growth on each of the three goals. The annual baseline values are determined by the prior year TFET score², or Baseline TFET in the case of a new teacher. Growth from the baseline to end-year TFET is determined by the table below. The final DPP score is the average of all three goals’ growth scores. For example, a teacher whose growth scores were 3, 3, and 2 would receive a DPP score of 2.6. This final score is placed on the same rating scale as the final TFET score. Thus a DPP of 2.6 is “Effective.”

Highly Effective (4)	Effective (3)	Developing (2)	Beginning (1)	Unsatisfactory (0)
Grows 4 levels	Grows 3 levels	Grows 2 level	Grows 1 level	Achieves no growth
<u>or</u> grows to Innovating	<u>or</u> grows to Applying	<u>or</u> grows to Developing	<u>or</u> grows to Beginning	<u>or</u> scores Not Using

B. Other Indicators of Performance

In this section, the district shall provide the following information regarding any other indicators of performance that will be included for instructional personnel evaluations.

1. Pursuant to section 1012.34(3)(a)4., F.S., up to one-third of the evaluation may be based upon other indicators of performance. At **Charter Schools USA**, other indicators of performance account for **0%** of the instructional personnel performance evaluation.
2. Description of additional performance indicators, if applicable.
3. Description of the step-by-step calculation for determining the other indicators of performance rating for classroom and non-classroom instructional personnel, including cut points for differentiating performance.

C. Performance of Students

In this section, the district shall provide the following information regarding the student performance data that will be included for instructional personnel evaluations.

1. Pursuant to section 1012.34(3)(a)1., F.S., at least-one third of the performance evaluation must be based upon data and indicators of student performance, as determined by each school

² All new teachers will receive a Baseline TFET evaluation to drive DPP goals and baseline scores after their 90 days.

district. This portion of the evaluation must include growth or achievement data of the teacher’s students over the course of at least three years. If less than three years of data are available, the years for which data are available must be used. Additionally, this proportion may be determined by instructional assignment. At **Charter Schools USA**, performance of students accounts for **45%** of the instructional personnel performance evaluation.

2. Description of the step-by-step calculation for determining the student performance rating for classroom and non-classroom instructional personnel, including cut points for differentiating performance.

Student Performance Measures

For the term of this plan (2022-2025), historical student growth on nationally normed assessments will be utilized (Northwest Evaluation Association’s Measures of Academic Progress—NWEA MAP, or Curriculum Associates’ i-Ready Diagnostic Assessment) as a measure of Student Performance.

Student Assessments

The School will base 45% of the overall performance rating on data and indicators of student academic performance and learning growth assessed annually by nationally normed assessments. Growth for students with disabilities and English language learners will be incorporated per the specifications of Florida statute.

For all full-time instructional staff members in roles, grades– including “newly hired” teachers, the School, pursuant to Florida Statute 1012.34, section 7 (b), will utilize three years of nationally normed growth data in math and ELA. Growth ratings will be assigned according to normative growth trends and across both math and ELA for a teacher’s students. All students in grades K-10 are monitored and assessed at least two times per year with MAP or i-Ready. These nationally normed, interim assessments, measure student achievement and growth in ELA and mathematics. Assessments are aligned to the Florida Standards Assessment as well as college and career readiness standards (ACT/SAT – MAP Only). At all grade levels MAP/i-Ready assessments are adaptive and computer-based. They also provide audio support for beginning readers.

After each MAP/i-Ready administration, each student receives a scale score growth target for normative/typical growth. These targets are provided by the vendors and represent the status (percentile) and growth norms drawn from over 5 million students’ assessment results nationwide. A student’s grade and instructional level impact their projected growth target. Students in the same grade, but at different achievement percentiles/levels, receive growth targets tailored to their ability level and the average growth achieved nationwide by students in the same grade and scoring at the same percentile/level at the beginning of the year. Each spring, MAP/i-Ready calculates the total percentage of students meeting their typical growth targets using the following equation:

$$\text{Percentage of Students who Met or Exceeded their Projected RIT / Typical Growth Target} = \frac{\text{Count of Students who Met or Exceeded their Projected RIT / Typical Growth Target}}{\text{Count of Students with Available Growth Projections and Scores}}$$

When this value exceeds 50%, average student growth, exceeds that of typical students nationwide.³ Three years of ratings will be used when valid and reliable data are available, with the most recent year carrying the most weight. Preliminary value ratings associated with performance on this metric are presented in the table below. These values are subject to change pending the schools' distribution of growth scores and updates to the normative distributions from NWEA and Curriculum Associates.

	% of Students Meeting RIT /Typical Growth Targets ¹
1 - Unsatisfactory	<20%
2 - Needs Improvement	20% - 40%
3 - Effective	41% - 54%
4 - Highly Effective	≥ 55%

For any staff member that has a school-wide impact, the School, pursuant to Florida Statute 1012.34, section 7 (b), will utilize the school-wide student learning growth (student growth measure) in math and ELA. The school-wide student learning growth measure for full-time instructional staff members without personal MAP/i-Ready data, will be measured by aggregate school-wide growth in math and ELA.

Roster Validation Procedures –Each school will use the processes and procedures required by CSUSA as well as the district procedure to verify and align class rosters with district systems for the analysis of VAM scores.

D. Summative Rating Calculation

In this section, the district shall provide the following information regarding the calculation of summative evaluation ratings for instructional personnel.

1. Description of the step-by-step calculation for determining the summative rating for classroom and non-classroom instructional personnel.
2. Pursuant to section 1012.34(2)(e), F.S., the evaluation system for instructional personnel must differentiate across four levels of performance. Using the district's calculation methods and cut scores described above in sections A – C, illustrate how a fourth-grade teacher and a ninth grade English language arts teacher can earn a highly effective and an unsatisfactory summative performance rating respectively.

³ If NWEA growth data is not available for a teacher, the school leader will determine the most appropriate measure of student achievement or growth relative to the teacher's curriculum and instruction. Kindergarten teachers will be evaluated using winter to spring growth norms, per the recommendation of the Northwest Evaluation Association. Teachers of 11th and 12th grade students may be evaluated by their students' achievement on College and Career Readiness benchmarks and/or graduation eligibility when MAP/i-Ready growth data is not available.

TES Evaluation Criteria

The TES evaluation criteria will be based on three years (when available⁴) of student academic growth, and current year instructional practice. The Teacher Feedback and Evaluation Tool (TFET) and Deliberate Practice Plan (DPP) comprise the Instructional Practice component.

Final Evaluation weighting ⁵

The metrics used to determine the final TES rating, along with each metric's weight in the final rating, are as follows:

- Student Academic Performance:
 - Student Performance Measure: 45%
- Instructional Practice:
 - Teacher Feedback Evaluation Tool (TFET) Score: 35%
 - Deliberate Practice Plan (DPP) Score: 20%

Details of the scoring and evaluation of teacher performance on Student Performance Measures, the TFET and the DPP are presented above in sections 1, 2 and 3 respectively.

Once Student Performance, TFET and DPP scores (1-4) are determined, they are combined according to the weighting above and assigned a rating based on the scale below:⁶

Highly Effective	Effective	Needs Improvement/ Developing	Unsatisfactory
3.05 – 4.00	1.65 – 3.04	1.15 – 1.64	0.75 – 1.14

The distinction between Needs Improvement and Developing is relative to the staff member's verifiable years of experience. Per rule 6A-5.030.(3).(d).1.c.(VII) the school may also amend an evaluation based upon assessment data from the current school year if the data becomes available within ninety(90) days after the close of the school year.

⁴ For full time instructional staff members with less than 3 years of data, years available will be used. Please see section **C. Student Performance Measures**, for details on instructional staff members without student growth results.

⁵ Pursuant to Florida statute 1012.01(3)(a).

⁶ CSUSA may adjust this scale in any year where there is a significant misalignment (defined as more than +/- 7% difference) between the distribution of CSUSA teachers and the state as a whole for any final performance rating category relative to the prior year.

Appendix A – Evaluation Framework Crosswalk

In Appendix A, the district shall include a crosswalk of the district's evaluation framework to each of the Florida Educator Accomplished Practices (FEAPs).

Alignment to the Florida Educator Accomplished Practices	
Practice	Evaluation Indicators
1. Instructional Design and Lesson Planning	
<i>Applying concepts from human development and learning theories, the effective educator consistently:</i>	
a. Aligns instruction with state-adopted standards at the appropriate level of rigor;	10, 19
b. Sequences lessons and concepts to ensure coherence and required prior knowledge;	12, 19
c. Designs instruction for students to achieve mastery;	9, 10, 12, 17-23
d. Selects appropriate formative assessments to monitor learning;	23, 24
e. Uses diagnostic student data to plan lessons; and,	23, 24
f. Develops learning experiences that require students to demonstrate a variety of applicable skills and competencies.	10, 16, 19-22
2. The Learning Environment	
<i>To maintain a student-centered learning environment that is safe, organized, equitable, flexible, inclusive, and collaborative, the effective educator consistently:</i>	
a. Organizes, allocates, and manages the resources of time, space, and attention;	2, 3, 4
b. Manages individual and class behaviors through a well-planned management system;	3, 5, 27
c. Conveys high expectations to all students;	8, 9, 10, 11, 18, 31
d. Respects students' cultural linguistic and family background;	6, 7, 13
e. Models clear, acceptable oral and written communication skills;	10, 14, 18, 25
f. Maintains a climate of openness, inquiry, fairness and support;	1, 4, 5, 6, 7, 8, 11, 12, 13
g. Integrates current information and communication technologies;	15, 22
h. Adapts the learning environment to accommodate the differing needs and diversity of students; and	4-8
i. Utilizes current and emerging assistive technologies that enable students to participate in high-quality communication interactions and achieve their educational goals.	15, 22
3. Instructional Delivery and Facilitation	
<i>The effective educator consistently utilizes a deep and comprehensive knowledge of the subject taught to:</i>	
a. Deliver engaging and challenging lessons;	9, 10, 11,
b. Deepen and enrich students' understanding through content area literacy strategies, verbalization of thought, and application of the subject matter;	7, 14, 21,
c. Identify gaps in students' subject matter knowledge;	23, 24
d. Modify instruction to respond to preconceptions or misconceptions;	11, 12, 17, 23, 24
e. Relate and integrate the subject matter with other disciplines and life experiences;	7, 19, 21,
f. Employ higher-order questioning techniques;	9, 10, 16, 21
g. Apply varied instructional strategies and resources, including appropriate technology, to provide comprehensible instruction, and to teach for student understanding;	10, 16, 17, 21, 23
h. Differentiate instruction based on an assessment of student learning needs and recognition of individual differences in students;	8, 10, 12, 23
i. Support, encourage, and provide immediate and specific feedback to students to promote student achievement;	8, 9, 11, 13, 17, 18
j. Utilize student feedback to monitor instructional needs and to adjust instruction.	23, 24

4. Assessment	
<i>The effective educator consistently:</i>	
a. Analyzes and applies data from multiple assessments and measures to diagnose students' learning needs, informs instruction based on those needs, and drives the learning process;	9, 17, 23
b. Designs and aligns formative and summative assessments that match learning objectives and lead to mastery;	17, 23,
c. Uses a variety of assessment tools to monitor student progress, achievement and learning gains;	9, 17, 23, 24
d. Modifies assessments and testing conditions to accommodate learning styles and varying levels of knowledge;	8, 12, 17, 23
e. Shares the importance and outcomes of student assessment data with the student and the student's parent/caregiver(s); and,	18, 24
f. Applies technology to organize and integrate assessment information.	23, 24, 26
5. Continuous Professional Improvement	
<i>The effective educator consistently:</i>	
a. Designs purposeful professional goals to strengthen the effectiveness of instruction based on students' needs;	25, 32,
b. Examines and uses data-informed research to improve instruction and student achievement;	21, 23, 32
c. Uses a variety of data, independently, and in collaboration with colleagues, to evaluate learning outcomes, adjust planning and continuously improve the effectiveness of the lessons;	9, 17, 18, 25, 32, 33
d. Collaborates with the home, school and larger communities to foster communication and to support student learning and continuous improvement;	8, 24, 28, 30, 31, 33
e. Engages in targeted professional growth opportunities and reflective practices; and,	32, 33
f. Implements knowledge and skills learned in professional development in the teaching and learning process.	21, 23, 25, 32, 33
6. Professional Responsibility and Ethical Conduct	
Understanding that educators are held to a high moral standard in a community, the effective educator:	
a. Adheres to the Code of Ethics and the Principles of Professional Conduct of the Education Profession of Florida, pursuant to Rules 6A-10.080 and 6A-10.081, F.A.C., and fulfills the expected obligations to students, the public and the education profession.	27, 29, 30, 31,33

Appendix B – Observation Instruments for Classroom Teachers

In Appendix B, the district shall include the observation rubric(s) to be used for collecting instructional practice data for classroom teachers.

Rating TFET Elements – Evaluation Protocols and Rubrics

Each indicator on the TFET utilizes a comprehensive, five-category scale, relative to observations and feedback inside and outside of the classroom.

TFET Rubric					
Innovating (4)	Applying (3)	Developing (2)	Beginning (1)	Not Using (0)	Not Observed (No Value Given)
<p>Teacher monitors impact of strategy and adjusts for those who are not initially responding to strategy so that 90-100% of students get to the intended learning outcome.</p> <p>Teacher is a network leader in this indicator and has had positive impact on the CSUSA community at large.</p>	<p>Teacher fluently uses this strategy and monitors it's impact on student learning outcomes so that 70-89% of students get to the intended learning outcome.</p> <p>Teacher is seen as a leader in this indicator and shares practices within school community.</p>	<p>Teacher use of the strategy was appropriate and correct. Teacher builds fluency with use of this strategy.</p> <p>Teacher focus on this indicator is growing and teacher is able to achieve the desired effect.</p>	<p>Teacher identified the appropriate strategy but use of the strategy was ineffective.</p> <p>Teacher was beginning to focus on this indicator but efforts were not effective.</p>	<p>Strategy was called for, but not exhibited.</p> <p>This indicator was appropriate but not addressed during this time period.</p>	<p>Instructional strategy was neither called for nor used during this portion of the lesson.</p>

Appendix C – Observation Instruments for Non-Classroom Instructional Personnel

In Appendix C, the district shall include the observation rubric(s) to be used for collecting instructional practice data for non-classroom instructional personnel.

Rating TFET Elements – Evaluation Protocols and Rubrics

Each indicator on the TFET utilizes a comprehensive, five-category scale, relative to observations and feedback inside and outside of classrooms.

TFET Rubric					
Innovating (4)	Applying (3)	Developing (2)	Beginning (1)	Not Using (0)	Not Observed (No Value Given)
<p>Teacher monitors impact of strategy and adjusts for those who are not initially responding to strategy so that 90-100% of students get to the intended learning outcome.</p> <p>Teacher is a network leader in this indicator and has had positive impact on the CSUSA community at large.</p>	<p>Teacher fluently uses this strategy and monitors it's impact on student learning outcomes so that 70-89% of students get to the intended learning outcome.</p> <p>Teacher is seen as a leader in this indicator and shares practices within school community.</p>	<p>Teacher use of the strategy was appropriate and correct. Teacher builds fluency with use of this strategy.</p> <p>Teacher focus on this indicator is growing and teacher is able to achieve the desired effect.</p>	<p>Teacher identified the appropriate strategy but use of the strategy was ineffective.</p> <p>Teacher was beginning to focus on this indicator but efforts were not effective.</p>	<p>Strategy was called for, but not exhibited.</p> <p>This indicator was appropriate but not addressed during this time period.</p>	<p>Instructional strategy was neither called for nor used during this portion of the lesson.</p>

Appendix D – Student Performance Measures

In Appendix D, the district shall provide the list of assessments and the performance standards that will apply to the assessment results to be used for calculating the performance of students assigned to instructional personnel. The following table is provided for convenience; other ways of displaying information are acceptable.

Student Performance Measures		
Teaching Assignment	Assessment(s)	Performance Standard(s)
Grades K-12 (including non-classroom instructional personnel)	Northwest Evaluation Association’s Measures of Academic Progress: Math and ELA or iReady (K-8)	The percent of a teacher’s students meeting their customized normative growth targets in Math, ELA and/or Science from the fall to the spring.
Non-Classroom Instructional Personnel	Northwest Evaluation Association’s Measures of Academic Progress: Math and ELA	The percent of a teacher’s students meeting their customized normative growth targets in Math, ELA and/or science from the fall to the spring. .

Appendix E – Summative Evaluation Forms

In Appendix E, the district shall include the summative evaluation form(s) to be used for instructional personnel.

TFET Score Summary Example

The screenshot displays a web-based evaluation tool. At the top, there is a navigation bar with a search function and various menu items. Below this, a notification states 'You have a ticket response waiting for you in your Support Tickets List'. The main area is titled 'Regular Observation #2' and includes a 'Save Regular Observation #2' button and a 'Start Timer' button. A search bar is present with the text 'Charter Schools USA Instructional Staff (v.2021)'. The interface shows a rubric for 'Domain 1: Well Managed Learning Environment'. The first item is '1.1 Students demonstrate respectful student-student and student-teacher interactions in a positive classroom climate - Mark As - View Marks'. The rubric has five columns: 'Not Using', 'Beginning', 'Developing', 'Applying', and 'Innovating'. The 'Applying' column is highlighted in green, indicating the selected score. Below the rubric, there are sections for 'Comments' and 'NOTES'. The second item is '1.2 Students' instructional time is protected - Mark As - View Marks', also with a rubric and 'Applying' column highlighted.

DPP Score Summary

The screenshot shows a web-based form for 'Sandbox, CCA - Deliberate Practice Plan'. It features a navigation bar and a 'CCA Sandbox' dropdown. The main content area is titled 'Selecting the Indicators' and includes a radio button selection for 'CHECKLIST ITEM: Deliberate Practice Plan (New Teacher)'. Below this, there are three sections for selecting indicators. Each section has a 'Focus Indicator #' dropdown menu and a text area for 'Indicator #1 Action Steps and Resources'. At the bottom, there is a 'STAFF SIGNOFF CONFIRMING THIS SECTION IS COMPLETE' section with a declaration text and an 'Admin Signoff: is Required' label.

Final Scoring Example

i You have a ticket response waiting for you in your [Support Tickets List](#)

A J - Teachers - FL

Location: Charter School

Assigned Evaluator(s): J (Primary), D

This document has not been viewed by the staff member

[View Full PDF](#) - [Delete Finalization](#)

Charter Schools USA Instructional Staff (v.2021) Finalization Worksheet Evaluation Ending Jun 2022

Employee Effectiveness Rubric: Click Here to Calculate EER	Not Yet Assigned	35.0%	Not Yet Assigned
Deliberate Practice Plan:	0.00	20.0%	0.00
Student Performance Measure:	0.00	45.0%	0.00
Final Rating:		0.00	Unsatisfactory

Range	Rating
3.05 to 4.00	Highly Effective
1.65 to 3.04	Effective
1.15 to 1.64	Needs Improvement/Developing
less than 1.15	Unsatisfactory

Final Evaluator Comments



School Administrator Evaluation System



Purpose

The purpose of this document is to provide the district with a template for its school administrator evaluation system that addresses the requirements of Section 1012.34, Florida Statutes (F.S.), and Rule 6A-5.030, Florida Administrative Code (F.A.C.). This template, Form AEST-2017, is incorporated by reference in Rule 6A-5.030, F.A.C., effective April 2018.

Instructions

Each of the sections within the evaluation system template provides specific directions, but does not limit the amount of space or information that can be added to fit the needs of the district. Where documentation or evidence is required, copies of the source documents (e.g., rubrics, policies and procedures, observation instruments) shall be provided at the end of the document as appendices in accordance with the Table of Contents.

Before submitting, ensure the document is titled and paginated.

Submission

Upon completion, the district shall email this form and any required supporting documentation as a Microsoft Word document for submission to DistrictEvalSysEQ@fldoe.org.

Modifications to an approved evaluation system may be made by the district at any time. Substantial revisions shall be submitted for approval, in accordance with Rule 6A-5.030(3), F.A.C. The entire template shall be sent for the approval process.

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Part I: Evaluation System Overview

In Part I, the district shall describe the purpose and provide a high-level summary of the school administrator evaluation system.

The Charter Schools USA Administrator Evaluation System is a comprehensive, multi-component assessment of a Leader's instructional leadership and the academic growth of their School. Instructional Leadership has the largest impact on a Leader's score- 55%, with Student performance (growth) accounting for 45% of the final evaluation.

Part II: Evaluation System Requirements

In Part II, the district shall provide assurance that its school administrator evaluation system meets each requirement established in section 1012.34, F.S., below by checking the respective box. School districts should be prepared to provide evidence of these assurances upon request.

System Framework

- The evaluation system framework is based on sound educational principles and contemporary research in effective educational practices.
- The observation instrument(s) to be used for school administrators include indicators based on each of the Florida Principal Leadership Standards (FPLSs) adopted by the State Board of Education.

Training

- The district provides training programs and has processes that ensure:
 - Employees subject to an evaluation system are informed of the evaluation criteria, data sources, methodologies, and procedures associated with the evaluation before the evaluation takes place; and
 - Individuals with evaluation responsibilities and those who provide input toward evaluations understand the proper use of the evaluation criteria and procedures.

Data Inclusion and Reporting

- The district may provide opportunities for parents and instructional personnel to provide input into performance evaluations, when the district determines such input is appropriate.

Evaluation Procedures

- The district's system ensures all school administrators are evaluated at least once a year.
- The district's evaluation procedures comply with the following statutory requirements in accordance with section 1012.34, F.S.:
 - The evaluator must be the individual responsible for supervising the employee; the evaluator may consider input from other personnel trained on the evaluation system.
 - The evaluator must provide timely feedback to the employee that supports the improvement of professional skills.

- The evaluator must submit a written report to the employee no later than 10 days after the evaluation takes place.
- The evaluator must discuss the written evaluation report with the employee.
- The employee shall have the right to initiate a written response to the evaluation and the response shall become a permanent attachment to his or her personnel file.
- The evaluator must submit a written report of the evaluation to the district school superintendent for the purpose of reviewing the employee's contract.
- The evaluator may amend an evaluation based upon assessment data from the current school year if the data becomes available within 90 days of the end of the school year.

Use of Results

- The district has procedures for how evaluation results will be used to inform the
 - Planning of professional development; and
 - Development of school and district improvement plans.
- The district's system ensures school administrators who have been evaluated as less than effective are required to participate in specific professional development programs, pursuant to section 1012.98(10), F.S.

Notifications

- The district has procedures for the notification of unsatisfactory performance that comply with the requirements outlined in Section 1012.34(4), F.S.
- The district school superintendent shall annually notify the Department of Education of any school administrators who
 - Receive two consecutive unsatisfactory evaluation ratings; or
 - Are given written notice by the district of intent to terminate or not renew their employment, as outlined in section 1012.34(5), F.S.

District Self-Monitoring

- The district has a process for monitoring implementation of its evaluation system that enables it to determine the following:
 - Compliance with the requirements of section 1012.34, F.S., and Rule 6A-5.030, F.A.C.;
 - Evaluators' understanding of the proper use of evaluation criteria and procedures, including evaluator accuracy and inter-rater reliability;
 - Evaluators provide necessary and timely feedback to employees being evaluated;
 - Evaluators follow district policies and procedures in the implementation of evaluation system(s);
 - Use of evaluation data to identify individual professional development; and,
 - Use of evaluation data to inform school and district improvement plans.

Part III: Evaluation Procedures

In Part III, the district shall provide the following information regarding the observation and evaluation of school administrators. The following tables are provided for convenience and may be customized to accommodate local evaluation procedures.

1. Pursuant to section 1012.34(3)(b), F.S., all personnel must be fully informed of the criteria, data sources, methodologies, and procedures associated with the evaluation process before the evaluation takes place. In the table below, describe when and how school administrators are informed of the criteria, data sources, methodologies, and procedures associated with the evaluation process.

Personnel Group	When Personnel are Informed	Method(s) of Informing
School Administrators	Annually in June and October. As well as ongoing training monthly.	Administrators will be informed of the criteria, data sources, methodologies, and procedures associated with the evaluation process during the annual leadership conferences held in June and in October. There will be ongoing maintenance training throughout the year at monthly leadership meetings.
New and Late Hires	New and Late Hires: October, January, June. Or as needed via online training.	New and Late hires will be informed of the criteria, data sources, methodologies, and procedures associated with the evaluation process at the National Leadership Conference in October or onboarding training in January or at the National Leadership Conference in June. Online training will be available as needed.

2. Pursuant to section 1012.34(3)(a)3., F.S., evaluation criteria for instructional leadership must include indicators based upon each of the FPLSs adopted by the State Board of Education. In the table below, describe when and how evidence of demonstration of the FPLSs is collected.

Personnel Group	When Evidence is Collected	Method(s) of Collection
Existing School Administrators as well as New and Late Hires	Frequency can range from weekly to a minimum of quarterly. Leaders are differentiated by needs, as determined by deliberate practice plans, student data and other informal observations.	Ongoing observations and feedback through formal notification and face to face follow-up. Acceptable forms of communication include, but are not limited to—Personnel Action Form, Improvement Plans, LPE tool, email, verbal feedback or one on one professional development.

3. Pursuant to section 1012.34(3)(a), F.S., a performance evaluation must be conducted for each employee at least once a year. In the table below, describe when and how many summative evaluations are conducted for school administrators.

Personnel Group	Number of Evaluations	When Evaluations Occur	When Evaluation Results are Communicated to Personnel
School Administrators as well as New and Late Hires	1	End-Year evaluation: Annually in the spring of each year prior to the last day of school	End-Year evaluation: In one-on-one conferences between staff member and the school leadership team, prior to the end of the school year.

Part IV: Evaluation Criteria

A. Instructional Leadership

In this section, the district shall provide the following information regarding the instructional leadership data that will be included for school administrator evaluations.

1. Pursuant to section 1012.34(3)(a)3., F.S., at least one-third of the evaluation must be based upon instructional leadership. In _____ County, instructional leadership accounts for _____% of the school administrator performance evaluation.
2. Description of the step-by-step calculation for determining the instructional leadership rating for school administrators, including cut points for differentiating performance.

Leadership Performance Evaluation

The Charter Schools USA family of schools has developed the Principal Evaluation System for 2015-16 and beyond with the ultimate goal of increasing student learning growth by improving the quality of instructional, administrative and supervisory services. Fifty-five percent (55%) of the LES will be comprised of the Leader Performance Evaluation (LPE) instrument which is based on the research of Robert J. Marzano and clearly connects to the Florida Principal Leadership Standards and the standards of the National Association of Elementary School Principals. Specifically, the research base for the LPE includes:

Leadership Assessment

- Marzano, Robert J. et.al. *School Leadership that Works*. Arlington, Virginia: Association for Supervision and Curriculum Development, 2005
- Marzano, Robert J. and Timothy Waters. *District Leadership that Works*. Bloomington, Indiana: Solution Tree Press, 2009
- Maxwell, John *The 21 Irrefutable Laws of Leadership*. Nashville, Tennessee: Thomas Nelson, Inc. 2007

Leading Faculty Development for Instructional Improvement

- Marzano, Robert J. *What Works in Schools: Translating Research into Action*. Arlington, Virginia: Association for Supervision and Curriculum Development, 2003

- Marzano, Robert J. *The Art and Science of Teaching*. Arlington, Virginia: Association for Supervision and Curriculum Development, 2007
- Marzano, Robert J. et.al. *Classroom Instruction that Works: Research-Based Strategies for Increasing Student Achievement*. Upper Saddle River, New Jersey: Prentice Hall, 2004
- Marzano, Robert J. et.al. *Classroom Management That Works: Research-Based Strategies for Every Teacher*. Upper Saddle River, New Jersey: Prentice Hall, 2008
- Marzano, Robert J. *Classroom Assessment & Grading that Work*. Arlington, Virginia: Association for Supervision and Curriculum Development, 2006

The Leader Evaluation System (LES) for all school administrators is based on sound educational principles and contemporary research in effective educational practices. (See the reference list previously cited.) Primarily consisting of the research of Robert J. Marzano and aligned to the Florida Leadership Principal Standards, the LPE is designed to draw on and incorporate educational leadership practices, including the 21 responsibilities of a school leader, the precepts of continuous improvement and others developed from Marzano's 35 years of research. These educational best practices are the foundation for the 119 elements within the LPE that measure administrator proficiency on the host of skills and tasks necessary to lead a school, its faculty and students, to success in improving student performance.

Instructional Leadership Evaluation Framework

Leader Performance Evaluation

With domains organized according to the 5 strategic priorities—1. Student Success, 2. Maximized Resources, 3. Development and Innovation, 4. Customer Focused Operational Performance and 5. World Class Team and Culture – the LPE's evaluation criteria reflect the comprehensive range of instructional leadership practices expected of each CSUSA principal and a balanced approach to quality and continuous improvement based on Robert S. Kaplan and David P. Norton's *The Balanced Scorecard* (1996). The 5 strategic priorities represent CSUSA's approach to addressing the unique challenges of charter schools, and to ensuring that the energies, abilities, and specific knowledge of all employees throughout the school and the organization are focused on improving the quality of services needed to increase student learning growth.

These priorities are also aligned to the domains of the Marzano Teacher Evaluation Model, recognizing that school leaders are the drivers of effective instruction in a building:

- **Academic Excellence/ Student Success (29 Elements 24% of LPE):** An unwavering focus on implementing CSUSA's research-based Educational Model based on Marzano's research.
 - Domain 1: Student Achievement*
 - Domain 2: Instructional Leadership
 - Domain 4: Professional and Ethical Behavior*
- **Culture of Excellence/ World Class Team and Culture (41 Elements 35% of LPE):** The intangible quality that inspires team members to volunteer their best every day, commits to their professional growth, and maximizes their effectiveness to increase student learning. It is also the component that supports team members in finding satisfaction and meaning in their work.

- Domain 2: Instructional Leadership
 - Domain 3: Organizational Leadership
 - Domain 4: Professional and Ethical Behavior *
- **Financial Health/ Maximized Resources (11 Elements 9% of LPE):** A commitment to sound business practices to ensure financial viability and the ability of the school to invest in educational programs and resources to increase student learning growth.
 - Domain 3: Organizational Leadership
 - Domain 4: Professional and Ethical Behavior *
 - **Growth/ Development and Innovation (5 Elements 4% of LPE):** The unique challenges of a charter school to create and meet enrollment demands, which form the basis for the school's financial health.
 - Domain 3: Organizational Leadership
 - Domain 4: Professional and Ethical Behavior *
 - **Customer Focused Operational Performance (33 Elements 28% of LPE):** The school-wide efforts to ensure a safe and orderly environment and the secure maintenance of student records.
 - Domain 3: Organizational Leadership
 - Domain 4: Professional and Ethical Behavior

Included in the alignment with CSUSA 5 strategic priority areas, the LPE addresses the statutory requirement that performance measures emphasize principal proficiency in recruiting and retaining effective teachers, improving the effectiveness of teachers, removing ineffective teachers, measures related to the effectiveness of classroom teachers in the school, the administrator's appropriate use of evaluation criteria and procedures, and other leadership practices that result in student learning growth. The indicators are based on evidence of leadership practice and include the following:

- ***Recruiting and Retention of Effective and Highly Effective Teachers:*** The indicators that address these areas follow, along with a description of what each leader will be rated on:
 - **67-70** – These indicators address following hiring guidelines that include:
 - Using salary worksheets, requisitions and approval process for staffing positions, as well as ensuring proper certifications and education before extending offers
 - Working with Charter Schools USA's Education Team to ensure the best staffing configuration to support school success
 - Working within budget constraints
 - Helping recruit for other schools in the network
 - **76-81** – These indicators focus on following guidelines for Compensation Management and Staff Recognition, including:
 - Supporting and advocating pay for performance
 - Facilitating staff understanding of benefits
 - Finding ways to make staff feel appreciated
 - Fairly allocates incentive bonuses based on performance

- **87** - Looking to encourage and develop people.
 - The latter is evidenced by the leader's use of recognition programs within the school, as well as programs to build up staff – such as staff meals, celebrations and the encouragement to participate in the Leading Edge leadership development program
- **97-98** – These indicators rate the leader on Followership and positive relations with staff.
 - Staff's public support of school leaders
 - The leader's understanding that good leaders require good followers
 - Staff does not criticize school leadership to peers, parents or students
 - Staff raises concerns to appropriate leaders at appropriate times
- ***Addressing Ineffective Teachers:*** Leader practices in addressing ineffective teachers are targeted by the following indicators:
 - **63-66** – These indicators rate the leader on following guidelines for Human Resources as follows:
 - Adherence to Human Resources policies
 - Following progressive discipline guidelines, including maintaining appropriate documentation
 - Reaching out to HR appropriately to address sensitive HR matters
 - Ability to be called on to help support peers in sensitive or difficult HR matters
 - These elements include evidence that when requesting to dismiss an employee, the leader has appropriate documentation in place; and that the leader does not terminate without HR involvement and contacts HR on sensitive matters prior to taking action
- ***Improvement in the Percentage of Instructional Personnel Rated as Highly Effective and Effective*** Indicators rate on the leaders' as follows:
 - **72-74** These indicators rate the leader on the following criteria:
 - Conducting regular classroom and building walk through
 - Maintenance of appropriate performance documentation
 - Ensuring bi –annual TFET for all new teaching hires, annual for returning teachers and evaluations are completed for all staff in a timely manner
- ****High Effect Size Indicators:*** High Effect Size indicators focus on feedback practices, facilitating professional learning, clear goals and expectations, instructional resources, high effect size strategies and instructional initiatives. They are incorporated in the Leader Performance Evaluation (LPE) in the following indicators:
 - Feedback Practices: 3, 4, 6, 9-11, 15, 20, 95, 96
 - Facilitating Professional Learning: 23-29, 71, 96, 104-118
 - Clear Goals and Expectations: 7, 8, 71, 76, 77, 83, 96, 115
 - Instructional Resources: 85, 88, 96, 104-109
 - High Effect Size Strategies: 10, 79-81, 87, 91- 96
 - Instructional Initiatives

- Monitoring Text Complexity: 1, 4, 5, 29, 96
- Interventions: 1, 4, 6, 29, 96
- Instructional Adaptations: 3, 8, 9, 55, 59, 93, 96
- ESOL Strategies: 3, 9, 11, 20, 31

The LPE is also 100% in alignment with the Florida Principal Leadership Standards and includes indicators that reflect the following:

- ***The Effectiveness of Classroom Teachers in the School:*** All the elements within the Academic Excellence section address effectiveness of teachers. The indicator numbers and what each leader is rated on follows:
 - **1-29** - A range of performance, including:
 - Involvement in the design and implementation of curriculum and instruction
 - Ensuring colleagues, faculty and staff are aware of the most current theories and practices and making the discussion of these a regular aspect of the school's culture
 - Establishing clear academic goals for the entire school and keeping those goals in the forefront of the school's attention
 - Monitoring and evaluating the effectiveness of teacher instructional practices and their impact on student learning
 - Designing improvement plans based on benchmark data
 - Providing timely and specific feedback to teachers, including on high effect size strategies
 - Managing the organization, operations and facilities to provide faculty with quality resources and time for professional learning
- ***The administrator's appropriate use of evaluation criteria procedures.*** Elements in the Performance Planning and Review section. rate a leader's evaluation of staff members, including:
 - **71-75** - These indicators address the following criteria:
 - Ensuring that staff Deliberate Practice Plans are completed and align to school wide goals
 - Performance of regular classroom and building walkthroughs
 - Maintenance of appropriate performance documentation
 - Conducting bi-annual evaluative Teacher Feedback Evaluation Tool (TFET) reviews for all new teaching hires and annual for returning teachers

Evaluation Rating Criteria - Rating Labels

The evaluator will utilize four comprehensive rating labels that will ultimately translate to the four labels required by Florida statutes. The scale is as follows:

- ***Level 4: Innovating*** (example: The leader has a deep understanding of instruction and assessment and innovates school wide strategies. The leader recognizes accomplishments and acknowledges failures while motivating continuous improvement)

- *Level 3: Applying* (example: The leader has a solid understanding of instruction and assessment and regularly monitors and evaluates effective instructional school practices and ensures it impacts student achievement.)
- *Level 2: Developing* (example: The leader has been in a leadership role for more than three years and has a basic understanding of instruction and assessment but struggles with implementation and monitoring the effectiveness of academic goals.)
- *Level 1: Beginning* (example: The leader has been in a leadership role for three years or less and has a basic understanding of instruction and assessment but struggles with implementation and monitoring the effectiveness of academic goals.)
- *Level 0: Not Using* (ex. Leader demonstrates little or no evidence of involvement in instruction and assessment)

Rubrics and weighting scales

The 119 elements in the LPE have been grouped by CSUSA's 5 strategic priority areas: 1. Student Success, 2. Maximized Resources, 3. Development and Innovation, 4. Customer Focused Operational Performance and 5. World Class Team and Culture to ensure a balanced approach to continuous improvement throughout the School. To summarize, the Domains of the 5 strategic priorities align to the 4 Domains of the Florida Principal Leadership Standards (FPLS) as follows:

- Student Success (29 elements, 24% of LPE) → EPLS Domains 1, 2 & 4
- World Class team and Culture (41 elements, 35% of LPE) → EPLS Domains 2, 3 & 4
- Maximized Resources (11 elements, 9% of LPE) → EPLS Domain 3 & 4
- Development and Innovation (5 elements, 4% of LPE) → EPLS Domain 3 & 4
- Customer Focused Operational Performance (33 elements, 28% of LPE) → FPLS Domain 3 & 4

The LPE elements are weighted by the percentage shown above and incorporate the wide range of responsibilities that fall within the principal's realm that are ultimately calculated to measure the instructional leadership portion of the evaluation. *Final weights will be determined by the number of elements receiving a score of 0-4, Not Observed ratings will be excluded from the weighting determination.*

Computation of Final LPE Score:

- **Step 1:** Rate observed elements at each of the following levels: Innovating (4), Applying (3), Developing (2), Beginning (1), Not Using (0) or Not Observed (no value given).
- **Step 2:** Find the average score for each of the 5 LPE Priority Area segments.
**These segment ratings will range from 1 to 4.*
- **Step 3:** Calculate the weighted average of the 5 LPE segment scores and place the resulting score, ranging from one to four, on the LPE scale below. Please see **Rubrics and weighting scales** of the LPE above for segment weights.

The final LPE rating scale is as follows:

Highly Effective	Effective	Needs Improvement/ Developing	Unsatisfactory
3.5 – 4.0	2.5 – 3.49	1.5 – 2.49	1.0 – 1.49

All observation results will be calculated and overseen by Charter Schools USA’s Human Resources Department, and with final approval by the leader’s Area Director. CSUSA Area Directors are responsible for completing all Principal Evaluations, the principal will complete assistant principal evaluations and the principal and assistant principal will complete all other leadership evaluations in the building. The LPE tool’s final rating scale is designed to maintain a high level of rigor in a leader’s instructional leadership evaluation. The scale used for the final combined evaluation is more aligned with state staff evaluation trends. Additional details of the evaluation process and evaluation protocols can be found below in subsequent sections.

B. Other Indicators of Performance

In this section, the district shall provide the following information regarding any other indicators of performance that will be included for school administrator evaluations.

1. Pursuant to section 1012.34(3)(a)4., F.S., up to one-third of the evaluation may be based upon other indicators of performance. At **Charter Schools USA**, other indicators of performance account for **0%** of the school administrator performance evaluation.
2. Description of additional performance indicators, if applicable.
3. Description of the step-by-step calculation for determining the other indicators of performance rating for school administrators, including cut points for differentiating performance.

C. Performance of Students

In this section, the district shall provide the following information regarding the student performance data that will be included for school administrator evaluations.

1. Pursuant to section 1012.34(3)(a)1., F.S., at least one-third of the performance evaluation must be based upon data and indicators of student performance, as determined by each school district. This portion of the evaluation must include growth or achievement data of the administrator’s school(s) over the course of at least three years. If less than three years of data are available, the years for which data are available must be used. Additionally, this proportion may be determined by administrative responsibilities. At **Charter Schools USA**, performance of students accounts for **45%** of the school administrator performance evaluation.
2. Description of the step-by-step calculation for determining the student performance rating for school administrators, including cut points for differentiating performance.

Student Performance Measures

For the term of this plan (2018-2021), historical student growth on nationally normed assessments will be utilized (Northwest Evaluation Association’s Measures of Academic Progress—NWEA MAP) as a measure of Student Performance. The school will base **45 percent** of the performance rating on data and indicators of student academic performance and learning growth assessed annually by internal, nationally normed MAP assessments. Growth for students with disabilities and English language learners are incorporated when scores are available.

Growth ratings will be assigned according to normative growth trends and across both math and ELA for all tested students in the school building. All students K-10 are monitored and assessed at least two times per year with MAP; students in grades 11 and 12 at least once per year. These nationally normed, interim assessments, measure student achievement and growth in ELA and mathematics. MAP assessments are aligned to the Florida Standards Assessment as well as college and career readiness standards (ACT/SAT). At all grade levels MAP assessments are adaptive and computer-based. They also provide audio support for beginning readers.

After each MAP administration, each student receives a RIT (scale score) growth target. These targets are provided by NWEA and represent the status (percentile) and growth norms drawn from over 10 million students’ assessment results nationwide annually. A student’s grade and instructional level impact their projected growth target. Students in the same grade, but at different achievement percentiles, receive growth targets tailored to their ability level and the average growth achieved nationwide by students in the same grade and scoring at the same percentile at the beginning of the year. Each spring, on the Achievement Status and Growth Report, NWEA calculates the total percentage of students meeting their RIT growth targets school-wide and for each class, grade level and subject using the following equation:

$$\text{Percentage of Students who Met or Exceeded their Projected RIT} = \frac{\text{Count of Students who Met or Exceeded their Projected RIT}}{\text{Count of Students with Available Growth Projections and Scores}}$$

When this value exceeds 50%, average student growth, exceeds that of typical students nationwide.¹ Three years of ratings will be used when available, with the most recent year carrying the most weight. Preliminary value ratings associated with performance on this metric are presented in the table below. These values are subject to change pending the schools’ distribution of growth scores and updates to the normative distributions from NWEA.

	% of Students Meeting RIT Growth Targets¹
1 - Unsatisfactory	<20%
2 - Needs Improvement	20% - 40%
3 - Effective	41% - 54%
4 - Highly Effective	≥ 55%

¹ If NWEA growth data is not available for a teacher, the school leader will determine the most appropriate measure of student achievement or growth relative to the teacher’s curriculum and instruction. Kindergarten teachers will be evaluated using winter to spring growth norms, per the recommendation of the Northwest Evaluation Association. Teachers of 11th and 12th grade students will be evaluated on the progress their students make on College and Career Readiness benchmarks—progress on MAP relative to NWEA’s ACT and SAT linking studies.

Roster Validation Procedures –Each school will use the processes and procedures required by CSUSA as well as the district procedure to verify and align class rosters with district systems for the analysis of VAM scores.

D. Summative Rating Calculation

In this section, the district shall provide the following information regarding the calculation of summative evaluation ratings for school administrators.

1. Description of the step-by-step calculation for determining the summative rating for school administrators.
2. Pursuant to section 1012.34(2)(e), F.S., the evaluation system for school administrators must differentiate across four levels of performance. Using the district’s calculation methods and cut scores described above in sections A – C, illustrate how an elementary principal and a high school principal can earn a highly effective and an unsatisfactory summative performance rating respectively.

LES Evaluation Criteria

The LES evaluation criteria will be based on three years (when available²) of student academic growth, and current year instructional practice. The Leader Performance Evaluation (LPE) and Leader Growth Plan (LGP) comprise the Instructional Practice component.

Final Evaluation weighting ³

The metrics used to determine the final LES rating, along with each metric’s weight in the final rating, are as follows:

- Student Academic Performance:
 - Student Performance Measure: 45%
- Instructional Practice:
 - Leader Performance Evaluation (LPE) Score: 55%

Details of the scoring and evaluation of leader performance on Student Performance Measures and the LPE are presented above in sections 1, and 2 respectively.

Once Student Performance and LPE scores (1-4) are determined, they are combined according to the weighting above and assigned a final rating based on the scale below:

Highly Effective	Effective	Needs Improvement/ Developing	Unsatisfactory
3.05 – 4.00	1.65 – 3.04	1.15 – 1.64	1.00 – 1.14

All evaluation results will be calculated and overseen by Charter Schools USA’s Human

² For leaders with less than 3 years of data, years available will be used. Please see section C. **Performance of Students**, for details.

³ Pursuant to Florida statute 1012.01(3)(a).

Resources Department, and with final determination by the leader's State Director, Area Director, Charter Schools USA's Senior Vice President of Education and Chief of schools, all of whom supervise school leaders. CSUSA State and Area Directors of Education are responsible for completing all Principal Evaluations, the principal will complete assistant principal evaluations and the principal and assistant principal will complete all other leadership evaluations in the building. Per rule 6A-5.030.(3).(d).1.c.(VII) the school may amend an evaluation based upon assessment data from the current school year if the data becomes available within ninety(90) days after the close of the school year.

Appendix A – Evaluation Framework Crosswalk

In Appendix A, the district shall include a crosswalk of the district's evaluation framework to each of the Florida Principal Leadership Standards (FPLSs).

The abbreviations used are as follows:

- SS – Student Success
- OP – Customer Focused Operational Performance
- WC – World Class Team and Culture
- MR – Maximized Resources
- DI – Development and Innovation

Alignment to the Florida Principal Leadership Standards	
Practice	Evaluation Indicators
Domain 1: Student Achievement	
1. Student Learning Results	
<i>Effective school leaders achieve results on the school's student learning goals.</i>	
a. The school's learning goals are based on the state's adopted student academic standards and the district's adopted curricula; and,	SS – 1, 4, 6-8, 29
b. Student learning results are evidenced by the student performance and growth on statewide assessments; district-determined assessments that are implemented by the district under Section 1008.22, F.S.; international assessments; and other indicators of student success adopted by the district and state.	SS - 7, 8, 29
2. Student Learning as a Priority	
<i>Effective school leaders demonstrate that student learning is their top priority through leadership actions that build and support a learning organization focused on student success.</i>	
a. Enables faculty and staff to work as a system focused on student learning;	SS – 2, 16, 23, 24, 28 WC – 83; MR - 110
b. Maintains a school climate that supports student engagement in learning;	SS – 2, 10, 16, 22, 23, 28 WC – 82, 86, 89
c. Generates high expectations for learning growth by all students; and,	WC - 83
d. Engages faculty and staff in efforts to close learning performance gaps among student subgroups within the school.	SS – 6-9, 20
Domain 2: Instructional Leadership	
3. Instructional Plan Implementation	
<i>Effective school leaders work collaboratively to develop and implement an instructional framework that aligns curriculum and state standards, effective instructional practices, student learning needs and assessments.</i>	
a. Implements the Florida Educator Accomplished Practices as described in Rule 6A-5.065, F.A.C., through a common language of instruction;	SS - 5
b. Engages in data analysis for instructional planning and improvement;	SS – 3, 8, 9, 11, 20 OP – 55, 56, 59, 60
c. Communicates the relationships among academic standards, effective instruction, and student performance;	SS – 1, 4-8,10, 11, 26, 27, 29; WC – 83
d. Implements the district's adopted curricula and state's adopted academic standards in a manner that is rigorous and culturally relevant to the students and school; and,	SS – 1, 5, 8, 27 OP – 47, 48
e. Ensures the appropriate use of high quality formative and interim assessments aligned with the adopted standards and curricula.	SS – 1, 6, 8
4. Faculty Development	

Alignment to the Florida Principal Leadership Standards	
Practice	Evaluation Indicators
<i>Effective school leaders recruit, retain and develop an effective and diverse faculty and staff.</i>	
a. Generates a focus on student and professional learning in the school that is clearly linked to the system-wide strategic objectives and the school improvement plan;	SS – 3, 7, 8, 10, 16, 22, 23, 28, 29; WC - 87
b. Evaluates, monitors, and provides timely feedback to faculty on the effectiveness of instruction;	SS – 3, 8, 9, 11, 20 WC - 87
c. Employs a faculty with the instructional proficiencies needed for the school population served;	WC - 87
d. Identifies faculty instructional proficiency needs, including standards-based content, research-based pedagogy, data analysis for instructional planning and improvement, and the use of instructional technology;	SS – 3, 9, 11 WC - 87
e. Implements professional learning that enables faculty to deliver culturally relevant and differentiated instruction; and,	WC - 87
f. Provides resources and time and engages faculty in effective individual and collaborative professional learning throughout the school year.	SS – 5, 9, 27 WC - 87
5. Learning Environment	
<i>Effective school leaders structure and monitor a school learning environment that improves learning for all of Florida's diverse student population.</i>	
a. Maintains a safe, respectful and inclusive student-centered learning environment that is focused on equitable opportunities for learning and building a foundation for a fulfilling life in a democratic society and global economy;	SS – 17-19, 22, 29
b. Recognizes and uses diversity as an asset in the development and implementation of procedures and practices that motivate all students and improve student learning;	SS – 1
c. Promotes school and classroom practices that validate and value similarities and differences among students;	SS – 3
d. Provides recurring monitoring and feedback on the quality of the learning environment;	SS – 3 OP – 47, 48, 49
e. Initiates and supports continuous improvement processes focused on the students' opportunities for success and well-being; and,	SS – 5
f. Engages faculty in recognizing and understanding cultural and developmental issues related to student learning by identifying and addressing strategies to minimize and/or eliminate achievement gaps.	SS – 27
Domain 3: Organizational Leadership	
6. Decision Making	
<i>Effective school leaders employ and monitor a decision-making process that is based on vision, mission and improvement priorities using facts and data.</i>	
a. Gives priority attention to decisions that impact the quality of student learning and teacher proficiency;	WC – 94 MR - 114
b. Uses critical thinking and problem solving techniques to define problems and identify solutions;	SS – 17; OP - 37 WC – 93
c. Evaluates decisions for effectiveness, equity, intended and actual outcome; implements follow-up actions; and revises as needed;	SS – 3, WC – 92,
d. Empowers others and distributes leadership when appropriate; and,	SS – 15, 16, 23, 26, 28
e. Uses effective technology integration to enhance decision making and efficiency throughout the school.	WC – 63

7. Leadership Development	
<i>Effective school leaders actively cultivate, support, and develop other leaders within the organization.</i>	
a. Identifies and cultivates potential and emerging leaders;	WC – 67, 71
b. Provides evidence of delegation and trust in subordinate leaders;	SS – 26, 29
c. Plans for succession management in key positions;	WC – 69, 70
d. Promotes teacher-leadership functions focused on instructional proficiency and student learning; and,	SS – 5, 26, 29
e. Develops sustainable and supportive relationships between school leaders, parents, community, higher education and business leaders.	SS – 12, 25, WC – 69, 70 MR - 113
8. School Management	
<i>Effective school leaders manage the organization, operations, and facilities in ways that maximize the use of resources to promote a safe, efficient, legal, and effective learning environment.</i>	
a. Organizes time, tasks and projects effectively with clear objectives and coherent plans;	SS – 15; OP – 30, 32, 35, 39, 44, 51, 52, 53, 55, 56, 57, 59, 60 WC – 91, 100, 101
b. Establishes appropriate deadlines for him/herself and the entire organization;	OP – 30, 40, 62 WC – 64, 90, 91, 101
c. Manages schedules, delegates, and allocates resources to promote collegial efforts in school improvement and faculty development; and,	OP – 33, 34 WC – 68, 91, 98, 99 MR – 104, 107, 109
d. Is fiscally responsible and maximizes the impact of fiscal resources on instructional priorities.	OP – 31, 54 WC – 76-78, 85, 91, 94 MR – 104 – 106, 108, 111, 112, 114, 115, 117, 118
9. Communication	
<i>Effective school leaders practice two-way communications and use appropriate oral, written, and electronic communication and collaboration skills to accomplish school and system goals by building and maintaining relationships with students, faculty, parents, and community.</i>	
a. Actively listens to and learns from students, staff, parents, and community stakeholders;	SS – 12, 13 OP – 43, 55, 56, 58, 61, 62; WC – 66, 81; MR - 111
b. Recognizes individuals for effective performance;	SS – 10; WC – 79-81, 97
c. Communicates student expectations and performance information to students, parents, and community;	SS – 12, 21 OP – 36, 41, 55; WC – 82, 95
d. Maintains high visibility at school and in the community and regularly engages stakeholders in the work of the school;	SS – 12, 13, 14, OP – 35-38, 59 WC – 72, 88, 96; MR - 113
e. Creates opportunities within the school to engage students, faculty, parents, and community stakeholders in constructive conversations about important school issues.	SS – 12, 13, 14, 15, 26 OP – 42, 55, 56, 61 WC – 74, 95, 96, 99, 95
f. Utilizes appropriate technologies for communication and collaboration; and,	SS – 12, 13 OP – 43, 45, 46; WC - 75
g. Ensures faculty receives timely information about student learning requirements, academic standards, and all other local state and federal administrative requirements and decisions.	OP – 41, 46 WC – 65, 73, 84

Domain 4: Professional and Ethical Behavior	
10. Professional and Ethical Behavior	
<i>Effective school leaders demonstrate personal and professional behaviors consistent with quality practices in education and as a community leader.</i>	
a. Adheres to the Code of Ethics and the Principles of Professional Conduct for the Education Profession in Florida, pursuant to Rules 6A-10.080 and 6A-10.081, F.A.C.;	OP – 50; DI -102, 103
b. Demonstrates resiliency by staying focused on the school vision and reacting constructively to the barriers to success that include disagreement and dissent with leadership;	SS – 16, 23, 28
c. Demonstrates a commitment to the success of all students, identifying barriers and their impact on the well-being of the school, families, and local community;	SS – 12, 13; DI - 116
d. Engages in professional learning that improves professional practice in alignment with the needs of the school system;	OP – 47; G - 119
e. Demonstrates willingness to admit error and learn from it; and,	SS – 10; DI – 103
f. Demonstrates explicit improvement in specific performance areas based on previous evaluations and formative feedback.	DI - 119

Appendix B – Observation Instruments for School Administrators

In Appendix B, the district shall include the observation rubric(s) to be used for collecting instructional leadership data for school administrators.

Observation Rubric by Domain for the Leader Performance Evaluation

CSUSA Leader Performance Evaluation (LPE)			
ACADEMIC EXCELLENCE			
Guaranteed and Viable Curriculum: Directly involved in the design and implementation of curriculum and instruction as evidenced by implementing the practices of involvement, monitoring, and intellectual stimulation.			
Innovating (4)	Applying (3)	Developing/Beginning (2)	Not Observed (1)
Principal has a deep understanding of curriculum design and innovates school wide practices in instruction, with continuous improvement within all school stakeholders and network of CSUSA schools.	Principal has a solid understanding of curriculum design and regularly monitors effective school practices and ensures it is part of the school culture.	Principal has a basic understanding of curriculum design but struggles with implementation and monitoring the effectiveness of school practices.	Principal demonstrates little or no evidence of involvement in design of curriculum.
Challenging Goals and Effective Feedback: Directly involved in the design and implementation of curriculum and instruction identified by implementing the practices of instruction and assessment, focus, monitoring/evaluating and affirmation.			
Innovating (4)	Applying (3)	Developing/Beginning (2)	Not Observed (1)
Principal has a deep understanding of instruction and assessment and innovates school wide strategies in effective instructional practices. Principal recognizes accomplishments and acknowledges failures while motivating continuous improvement on areas of growth and network of CSUSA schools.	Principal has a solid understanding of instruction and assessment and regularly monitors and evaluates effective instructional school practices and ensures it impacts student achievement.	Principal has a basic understanding of instruction and assessment but struggles with implementation and monitoring the effectiveness of academic goals.	Principal demonstrates little or no evidence of involvement in instruction and assessment.

Parent and Community Involvement: Directly involved in establishing strong communication with parents and all stakeholders by developing relationships and reaching out to the community.			
Innovating (4)	Applying (3)	Developing/Beginning (2)	Not Observed (1)
Principal has a deep understanding of establishing strong lines of communication with parents and community members. Principal has well established procedures and routines for all stakeholders. Continues to develop strong relationships with all community members and network of CSUSA schools.	Principal has a solid understanding of establishing strong lines of communication with parents and community members. Principal provides opportunities for community involvement and school activities/projects.	Principal has a basic understanding of establishing strong lines of communication with parents and community members but struggles with developing opportunities with community involvement and school activities/projects.	Principal demonstrates little or no evidence of involvement in developing strong lines of communication or community involvement.
Safe and Orderly Environment: Directly involved in the design and implementation of operating procedures and maintaining a safe and orderly environment by monitoring and evaluating effective school practices.			
Innovating (4)	Applying (3)	Developing/Beginning (2)	Not Observed (1)
Principal has a deep understanding of design and implementation of operating procedures and maintains a safe and orderly environment and monitors and evaluates the effectiveness of school practices and student discipline. Principal continuously communicates clear expectations for all stake holders involved as evidenced by the school culture.	Principal has a solid understanding of design and implementation of operating procedures and maintains a safe and orderly environment and regularly monitors and evaluates effective student discipline.	Principal has a basic understanding of design of school operational procedures and maintains an orderly environment but struggles with implementation and monitoring the effectiveness of a safe and orderly environment.	Principal demonstrates little or no evidence of involvement of design and implementation of operating procedures and maintaining a safe and orderly environment.
Collegiality and Professionalism: Directly establishes the norms of conduct that develops collegiality and professionalism among staff as evidenced by monitoring and evaluating school policies and allowing input from staff.			
Innovating (4)	Applying (3)	Developing/Beginning (2)	Not Observed (1)
Principal has a deep understanding of establishing norms that foster collegiality and professionalism and innovates school wide practices of collaboration regarding important policies and network of CSUSA schools.	Principal has a solid understanding of establishing norms that foster collegiality and professionalism and regularly monitors and fosters discussion amongst teachers about policies.	Principal has a basic understanding of establishing norms that foster collegiality and professionalism but struggles with monitoring and involving teachers in important decisions.	Principal demonstrates little or no evidence of involvement in development of a collegiate and professional school culture.

OPERATIONAL PERFORMANCE			
Registration/Student Records: Ensures a smooth running registration process with secure maintenance of school records.			
Innovating (4)	Applying (3)	Developing/Beginning (2)	Not Observed (1)
Principal is a recognized leader in helping others with these activities.	Principal is aware of the CSUSA and school rules and procedures and adheres to them.	Principal is aware of the CSUSA and school rules and procedures but does not adhere to them or does not actually complete or follow through with attempts to monitor and evaluate these activities	Principal makes not attempt to monitor and evaluate these activities
Governing Board Relations: Works to establish and maintain positive relations with the school's governing board.			
Innovating (4)	Applying (3)	Developing/Beginning (2)	Not Observed (1)
Principal is a recognized leader in establishing and maintaining positive relations with the governing board and helps others with these activities.	Principal is aware of the responsibilities with the governing board and adheres to them.	Principal is aware of the responsibilities with the governing board but does not adhere to them or does not actually complete or follow through with them.	Principal makes no attempt to engage with governing board.
Facilities: Follows CSUSA guidelines for facilities.			
Innovating (4)	Applying (3)	Developing/Beginning (2)	Not Observed (1)
Principal coordinates and communicates with the facilities department to ensure repair and maintenance of the building while taking into consideration the needs of other schools and does not demand more than his/her share of resources.	Principal coordinates and communicates with the facilities department to ensure repair and maintenance of the building.	Principal is aware of the responsibilities to communicate and coordinate with the facilities department but not follow through with the department to ensure repair and maintenance of the building.	Principal makes no attempt to coordinate or communicate with the facilities department to ensure repair and maintenance of the building.

Communications: Supports CSUSA Communications Function			
Innovating (4)	Applying (3)	Developing/Beginning (2)	Not Observed (1)
Principal is a recognized leader in helping others with these activities.	Principal supports the CSUSA communications function.	Principal is aware of the responsibilities to support CSUSA communication functions but does not adhere to them or follow through with attempts to meet these functions.	Principal makes no attempt to support the communication functions of CSUSA.
District/State Rules: Complies with all Federal, State and District rules.			
Innovating (4)	Applying (3)	Developing/Beginning (2)	Not Observed (1)
Principal is a recognized leader in helping others to comply with Federal, State, and District rules.	Principal complies with Federal, State, and District rules.	Principal is aware of Federal, State, and District rules but does not adhere to them or does not actually complete them or follow through with attempts to adhere to them.	Principal makes no attempt to comply with Federal, State, and District rules.
Vendors: Effectively manages vendors and coordinates with CSUSA liaison			
Innovating (4)	Applying (3)	Developing/Beginning (2)	Not Observed (1)
Principal not only manages vendors with coordination with CSUSA but seeks out and creates new vendor partnerships.	Principal manages vendors and coordinates vendor services with CSUSA.	Principal attempts to manage vendors and coordinate vendor service with CSUSA.	Principal makes no attempt to neither manage vendors nor coordinate vendor service with CSUSA.
Strategic Planning: Ensure that the school is involved in the Strategic Planning process			
Innovating (4)	Applying (3)	Developing/Beginning (2)	Not Observed (1)
Principal is a recognized leader in the strategic planning process and leads the strategic planning process for others.	Principal engages in the strategic planning process where the plan is completed on time, is aligned to the CSUSA plan, and addresses all strategic planning priorities.	Principal engages in the strategic planning process but the plan is not completed on time, is not aligned to the CSUSA plan, and does not address all strategic planning priorities.	Principal makes no attempt to engage in the strategic planning process.

Professional Protocols: Red Carpet Customer Service			
Innovating (4)	Applying (3)	Developing/Beginning (2)	Not Observed (1)
Principal is a recognized leader in helping others demonstrate professional protocols.	Principal is aware of and demonstrates professional protocols.	Principal is aware of professional protocols but does not demonstrate them or follow through with them.	Principal makes no attempt to perform these activities.
CULTURE OF EXCELLENCE			
Human Resources Policy: Follows CSUSA guidelines for Human Resources			
Innovating (4)	Applying (3)	Developing/Beginning (2)	Not Observed (1)
Principal is seen as the leader in helping others adhere to CSUSA HR Policy.	Principal is aware and adheres to CSUSA HR policy.	Principal is aware of CSUSA HR policy but does not adhere to or follow through with attempts to do so.	Principal makes no attempt to adhere to CSUSA HR Policy.
Hiring: Follows CSUSA guidelines for Hiring			
Innovating (4)	Applying (3)	Developing/Beginning (2)	Not Observed (1)
Principal is seen as the leader in helping others adhere to CSUSA Hiring Policy.	Principal is aware and adheres to CSUSA Hiring policy.	Principal is aware of CSUSA Hiring policy but does not adhere to or follow through with attempts to do so.	Principal makes no attempt to adhere to CSUSA Hiring Policy.
Performance Planning and Review: Follows CSUSA guidelines for Performance Planning and Review			
Innovating (4)	Applying (3)	Developing/Beginning (2)	Not Observed (1)
Principal is the recognized leader and helps others in meeting these expectations.	Principal is aware of CSUSA's performance expectations and adheres to them.	Principal is aware of CSUSA's performance expectations but not completing these activities.	Principal makes no attempts to perform these activities.
Compensation Management: Follows CSUSA guidelines for Compensation Management			
Innovating (4)	Applying (3)	Developing/Beginning (2)	Not Observed (1)
Principal is recognized as the leader in the support and implementation of pay for performance initiatives and understanding of benefits.	Principal is aware of CSUSA's pay for performance initiatives, understanding of benefits and successfully implements them.	Principal is aware of CSUSA's pay for performance initiatives, understanding of benefits but does not follow through with expectations.	Principal does not openly support CSUSA's pay for performance initiatives and/or understands benefits.

Staff Recognition: Directly involved in the design and implementation of Staff Recognition activities			
Innovating (4)	Applying (3)	Developing/Beginning (2)	Not Observed (1)
Principal is recognized as the leader in implementing in staff recognition programs.	Principal successfully implements staff recognition activities.	Principal attempts to perform staff recognition activities but unsuccessfully.	Principal makes no attempts to perform these activities.
CSUSA Values: Supports CSUSA Values			
Innovating (4)	Applying (3)	Developing/Beginning (2)	Not Observed (1)
The Principal is the recognized leader in helping others demonstrate CSUSA's Values.	The Principal is aware of and demonstrates CSUSA's values.	The Principal is aware of CSUSA's values but does not demonstrate them or follow through with attempts to do so.	Principal makes no attempt to perform these activities related to CSUSA's Values
Leadership: Follows CSUSA guidelines for Leadership			
Innovating (4)	Applying (3)	Developing/Beginning (2)	Not Observed (1)
Principal is seen as a leader in demonstrating Marzano's 21 responsibilities.	Principal exhibits Marzano's 21 responsibilities of a leader.	Principal attempts to exhibit Marzano's 21 responsibilities of a leader.	Principal does not perform any of Marzano's 21 responsibilities of a leader
Followership: Ensures positive relations with staff.			
Innovating (4)	Applying (3)	Developing/Beginning (2)	Not Observed (1)
Principal is the recognized leader in helping others demonstrate followership.	Principal is aware of and demonstrates CSUSA's expectations in regards to followership.	Principal is aware of CSUSA's expectations in regards to followership but does not demonstrate them or follow through with attempts to do so.	Principal makes no attempt to perform these activities.
Professional Protocols - Attendance: Follows CSUSA guidelines for Professional Protocols			
Innovating (4)	Applying (3)	Developing/Beginning (2)	Not Observed (1)
Principal is the recognized leader in helping others demonstrate CSUSA's professional protocols.	Principal is aware of and demonstrates CSUSA's professional protocols.	Principal is aware of CSUSA's professional protocols but does not demonstrate them or follow through with attempts to do so.	Principal makes no attempt to perform these activities related to professional protocols.

Professional Protocols - Dress: Follows CSUSA guidelines for Professional Protocols - Dress			
Ethics: Follows CSUSA guidelines for Code of Ethics			
Innovating (4)	Applying (3)	Developing/Beginning (2)	Not Observed (1)
Principal is the recognized leader in helping others adhere to the Code of Ethics/CSUSA Ethics Agreement.	Principal is aware and adheres to the Code of Ethics/CSUSA Ethics Agreement.	Principal is aware of the Code of Ethics/CSUSA Ethics Agreement. but does not demonstrate them.	Principal makes no attempt to adhere to the Code of Ethics/CSUSA Ethics Agreement.
FINANCIAL HEALTH			
Budget Development and Management: Complies with all budget policies and procedures.			
Innovating (4)	Applying (3)	Developing/Beginning (2)	Not Observed (1)
Principal is a recognized leader in helping others with these financial activities.	Principal is aware of the CSUSA and school financial rules and procedures and adheres to them.	Principal is aware of the CSUSA and school financial rules and procedures but does not adhere to them or does not complete or follow through with attempts to meet them.	Principal makes no attempt to perform these financial activities.
Business Administrator Relations: Works to establish and maintain positive relations.			
Innovating (4)	Applying (3)	Developing/Beginning (2)	Not Observed (1)
Principal is a recognized leader in helping others with these activities.	Principal establishes a collegial working relationship with the Bookkeeper, Business Administrator, Business Manager, Regional Business Administrator, and/or VP of School Finance and collaborates with business personnel.	Principal is aware of the responsibilities to establish a collegial working relationship with the Bookkeeper, Business Administrator, Business Manager, Regional Business Administrator, and/or VP of School Finance but does not establish a collegial working relationship or collaborate with business personnel.	Principal makes no attempt to perform these activities.

Fundraising: Directly involved in the design and implementation of fundraising initiatives.			
Innovating (4)	Applying (3)	Developing/Beginning (2)	Not Observed (1)
Principal is a recognized leader in helping others with these activities.	Principal is aware of CSUSA and the school's grants and fundraising initiatives and participates in them in accordance with his/her talents.	Principal is aware of CSUSA and the school's grants and fundraising initiatives but does not participate in them in accordance with his/her talents.	Principal makes no attempt to perform these activities.
GROWTH			
Growth/Enrollment: Directly involved with the process of student enrollment, waiting list, recomital process and retention of students among all stakeholders involved. Monitors the registration and lottery process while making sure that it is aligned with CSUSA and all state requirements.			
Innovating (4)	Applying (3)	Developing/Beginning (2)	Not Observed (1)
Principal has a deep understanding of the process of student enrollment, recommittal, waiting list and regularly monitors the registration process on SIS and District mainframe. Principal shares best practices and state policies for enrollment and retention within the network of CSUSA schools.	Principal has a solid understanding of the process of student enrollment, recommittal, and waiting list, and regularly monitors the registration process on SIS and District mainframe.	Principal has a basic understanding of the process of student enrollment, recommittal, and waiting list. but struggles with monitoring the registration process on SIS and District mainframe.	Principal demonstrates little or no evidence of involvement in the process of student enrollment, recommittal, and waiting list procedures.
Professional Growth: Ensures alignment among CSUSA, school and professional goals.			
Innovating (4)	Applying (3)	Developing/Beginning (2)	Not Observed (1)
Principal has a deep understanding of the development of Professional Growth Plan and meets all goals.	Principal has a solid understanding of the development of Professional Growth Plan and mostly meets all goals.	Principal has a basic understanding of the development of Professional Growth Plan and partially meets goals.	Principal demonstrates little or no evidence of development of Professional Growth Plan or attainment of goals.

Appendix C – Student Performance Measures

In Appendix C, the district shall provide the student performance measures to be used for calculating the performance of students for school administrators.

Student Performance Measures		
Grade Levels Served	Assessment(s)	Performance Standard(s)
Grades K-10	Northwest Evaluation Association's Measures of Academic Progress: Math and ELA	The percent of the school's students meeting their customized normative growth targets in Math and ELA from the fall to the spring.
Grades 11-12	Northwest Evaluation Association's Measures of Academic Progress: Math and ELA	The percent of the school's students improving their projected ACT/SAT aligned scores from the prior year.

Appendix D – Summative Evaluation Forms

In Appendix D, the district shall include the summative evaluation form(s) to be used for school administrators.

Final Scoring Examples

School Leader			
Unsatisfactory		Highly Effective	
LPE	1.26 Unsatisfactory	LPE	2.85 Effective
Growth	1.00 Unsatisfactory	Growth	4.00 Highly Effective
FINAL SCORE	1.09 Unsatisfactory	FINAL SCORE	3.34 Highly Effective
Example Leader summary page:			
 <p>Charter Schools USA Leader Evaluation System 2018-2019 School Year</p> <p>Leader Name: _____ School: _____ Position: _____ Submitted to County: _____</p> <p>Final Score: Final Rating: </p> <div style="border: 1px solid black; padding: 5px; width: fit-content; margin: 10px auto;"> <p>55% Instructional Leadership: _____</p> <p>45% Student Performance _____</p> </div> <p>Area Director: _____ Signature: _____</p>			

Grant Procedures Manual

In support of Federal, State, Local and Private Sector grants

Pursuant to Requirements in 2 CFR Part 200: Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards, and Education Department General Administrative Regulations (EDGAR)

Effective January 15, 2019 (Revised May 2021)



Developed in Conjunction with Noble Education Initiative for use by Charter Schools USA

These grant policies and procedures are applicable to all federal, state, local and private sector grants awarded to CSUSA schools. All employees who deal with grants must be familiar with them and must fully comply with all requirements contained herein.

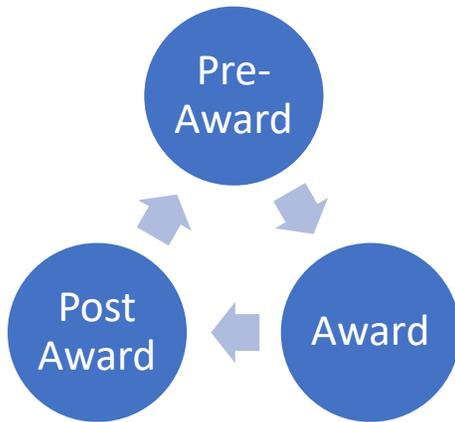
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Purpose: The purpose of this document is to establish policies and procedures that apply to all grant related actions. Sections contained herein provide specific procedures related to acquiring, expending, and managing grant funds.

The Grant Lifecycle - The grant process follows a linear lifecycle that includes creating the funding opportunity, applying, making award decisions, and successfully implementing the award and finally, closing out the award. The specific actions along the lifecycle are grouped into three main phases. While there are three phases to the grant process, they are all part of the full grant lifecycle and should not be separated or operated individually. The three phases are:

1. Pre-Award which includes the identification of funding opportunities and the application review and submission.
2. Award Phase includes the follow-on best and final specific question and answer criteria and the award decision and formal notification.
3. Post Award is the most active phase of the grant process and includes implementation, documentation, reporting, fund management and close-out.



Those that share in the responsibility for implementation, administration, and oversight include all senior members of Charter Schools USA (CSUSA), the school boards and foundations, the State Directors, Superintendents, School Principals, Grant Coordinators, School Operations Administrators (BMs), Teachers, Parents and Staff Members at all CSUSA schools.

These procedures cited in the manual shall constitute the administrative regulations for all grant related processes and procedures. The School boards and foundations, Superintendents, State Directors or designee, shall approve this CSUSA Grants Manual on an annual basis, or as appropriate, if federal, state or local changes in regulations or policy warrant immediate changes. These administrative regulations [procedures] are subject to Board/foundation review but shall not be adopted by the Board.

The primary goal of CSUSA is to manage our federal, state, local and private sector grants with the highest standard of integrity and to protect the assets of each school and to ensure that all financial transactions are performed in accordance with the Generally Accepted Accounting Principles (GAAP), board policies and all applicable laws and regulations.

Retention of Grant Related Records - All financial records for the current fiscal year shall be retained for audit purposes in accordance with Federal requirements for grant records retention. All grant related records will be maintained and immediately accessible for the year of grant award plus four years following final close-out of financial records for the grant. Destruction of records shall occur following the expiration of the records retention period. All destruction of records shall be accomplished in a manner

that ensure the information is burned, shredded or completely destroyed so that there is no pirating of the information by non CSUSA persons.

The Grant Coordinator shall maintain all grant-related records in primarily electronic format. Paper format can be maintained if electronic imaging is not possible. The back-up documentation of all expenditure draw-downs shall be scanned and maintained in electronic format if at all possible.

Confidentiality of Information - The information contained in the grant documents contains a substantial amount of confidential information. All staff is strictly prohibited from revealing confidential information to any unauthorized individuals. Unless required by Federal, state, and local statute, the Grant Coordinator is not required to permit public access to these records. The Grant Coordinator shall make all grant-related records available for access to the substantiated federal or state granting agency and/or pass-through entity upon request.

All business office staff shall adhere to the policies regarding confidential information. Among the most critical information is documentation related to employee's Personally Identifiable Information (PII) such as health, benefits, financial, or other personal information. PII is defined in Office of Management and Budget (OMB) Memorandum M-07-1616 and is information that can be used to distinguish or trace an individual's identity, either alone or when combined with other personal or identifying information that is linked or linkable to a specific individual.

Violators will be subject to discipline, employment termination, and/or may be reported to the appropriate legal authorities. Violations of some protected information, such as health or medical information, is also protected by federal law. Unless notified otherwise by the federal granting agency, the Grant Coordinator shall retain all financial and program records related to the grant award in accordance with the federal or state grant guidance. Upon request from the federal granting agency, the Grant Coordinator shall transfer the records to the requesting federal or state agency using a secure format. Other CSUSA staff shall be authorized to access the Grant Coordinator's records for job-or mission related purposes only. Use of the information for personal reasons or benefit will result in disciplinary action, up to and including employment termination. Each Grant Coordinator shall take appropriate steps to ensure that their respective computer system and grant records are managed in a controlled environment to prevent unauthorized access. At no time shall a computer system be logged onto a financial data system while unattended by the Grant Coordinator.

Grant Coordinator Training - Every Grant Coordinator is encouraged to attend at least one training and/or professional development opportunity per year to increase their knowledge, skills, abilities, and competency proficiency. The Grant Coordinator shall submit their request for training and/or professional develop to their State Director and the Director of Grants for review and approval. The training or professional development activity shall be directly job related and shall not impact grant related timelines or priorities.

Federal Regulations for Grants - All federal grant funds are subject to the compliance with Administrative and Programmatic regulations for each federal grant award.

When CSUSA or school policies conflict with the federal, state, or district regulations, all shall comply with the more restrictive federal and state grants management regulations.

The Office of Management and Budget's (OMB) *Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards* (commonly called "Uniform Guidance") was officially implemented

in December 2014 The Uniform Guidance is a "government-wide framework for grants management" and is an authoritative set of rules and requirements for Federal awards

The Uniform Guidance reduces the administrative burden on award recipients and guards against the risk of waste and misuse of Federal funds. OMB's Uniform Guidance does the following:

- Removes previous guidance that is conflicting and establishes standard language;
- Directs the focus of audits on areas that have been identified as at risk for waste, fraud and abuse;
- Lays the groundwork for Federal agencies to standardize the processing of data;
- Clarifies and updates cost reporting guidelines for award recipients.

Title 34, Code of Federal Regulations (CFR), § 75-79, § 81 to 86 and § 97-99 Education Department General Administrative Regulations (EDGAR) is currently in transition to the OMB Uniform Guidance. For awards made prior to 12/26/2014, EDGAR § 74 and 80 still apply. For awards made on or after 12/26/2014, 2 CFR § 200, which includes the substance formerly in parts 74 and 80, applies.

The EDGAR can be accessed at: <http://www2.ed.gov/policy/fund/reg/edgarReg/edgar.html> .

To ensure consistency with the EDGAR, the Grant Coordinator shall utilize the acronyms and definitions included in the EDGAR, Subpart A through E, for general terms related to the management of federal grant funds. Refer to the link above to access this information.

The Grant Coordinators and all CSUSA staff that support federal and state grants shall comply with all General Provisions of EDGAR (Subpart B). Specific areas of compliance are noted below:

Conflict of Interest – As required in 2 CFR 200.318(C)(1) and 2 CFR 200.318(C)(2), CSUSA maintains the following conflict of interest standard for the organization and all personnel. This standard will apply to all federal and state grant awards. CSUSA and all personnel shall disclose in writing any potential conflict of interest to the granting agency.

Employees and Board Members have an obligation to conduct business within guidelines that prohibit actual or potential conflicts of interest. This policy establishes only the framework within which Charter Schools USA wishes the business to operate. The purpose of these guidelines is to provide general direction so that employees and Board Members can seek further clarification on issues related to the subject of acceptable standards of operation.

For purposes of CSUSA, a conflict of interest occurs when there is an actual or perceived benefit to an individual as a result of their actions or decisions. A conflict also occurs when an employee or Board Member can influence a decision that may result in personal gain for that employee, Board Member, relative, or acquaintance as a result of CSUSA business. For the purposes of this policy, a relative is any person who is related by blood or marriage, or whose relationship with the employee or Board Member is like that of persons who are related by blood or marriage.

Transactions with outside firms must be conducted within a framework established and controlled at the executive level of CSUSA. Business dealings with outside firms should not result in unusual gains for those firms.

CSUSA shall comply with all additional conflict of interest requirements required by the federal or state granting agency. CSUSA shall disclose in writing to the granting agency and/or pass-through entities any violations of federal criminal law including fraud, bribery or gratuity violations affecting a federal and/or state grant award. Upon detection of any fraud, abuse or waste with federal and/or state grant funds, the CSUSA shall promptly notify the proper legal authorities and pursue appropriate criminal and/or civil

actions. In addition, CSUSA shall report to the granting agency and pass-through entity, the extent of the fraud or violations. In addition, CSUSA shall reclassify fraudulent expenditures made with federal and/or state grant awards to local school funds. The State Director, Superintendent, or designee, in coordination with the Grant Coordinator, shall be responsible for overseeing, reporting and documenting any fraud, abuse or waste of federal and/or state grant funds.

All CSUSA employees are prohibited from soliciting gifts or tokens from vendors or other parties who are affected by (or have an interest in) a federal or state grant award.

In addition, all CSUSA employees are prohibited from accepting unsolicited gifts or tokens from vendors or other parties who are affected by (or have an interest in) a federal or state grant award that exceeds a nominal individual value of \$25 and an aggregate value of \$100 in a fiscal year. The unsolicited gifts or tokens may not include drugs, tobacco or alcohol products.

CSUSA employees who violate this administrative directive shall be subject to disciplinary action, up to and including termination of employment. Violations that exceed the federal Conflict of Interest thresholds shall be reported to the federal or state granting agency and/or pass-through entity by the Superintendent, State Director or designee.

Pre-Federal Award Requirements - The federal awarding agency and pass-through entities are required to evaluate the risk of each school in respect to financial stability, quality of management system, history of performance (grants), audit reports and ability to effectively implement the grant program.

The Grant Coordinator in support of all CSUSA schools shall implement strategies as noted below to ensure that the risk level for federal grants management is determined to be “low”.

- Timely submission of all required programmatic and financial reports
- Comply with the federal grant award fiscal guidelines and allowable cost principles
- Ensure all grant-related staff are properly trained in their respective grant’s management role on at least an annual basis.
- Implement grant management procedures and internal controls

If a school is determined to be a “high risk”, the Grant Coordinator shall comply with all the additional requirements as imposed by the federal granting agency and/or pass-through entity. In addition, the Grant Coordinator supporting the school shall develop and implement strategies to correct the identified deficiencies in an effort to reduce the entity risk status.

No pre-award expenses shall be made by the Grant Coordinator or CSUSA staff member prior to the approval of the federal granting agency or pass-through entity. Unauthorized pre-award expenses, if any, shall be paid from local operational funds,

Types of Grants - The school may be eligible to apply for “entitlement” or “competitive” federal grant funds. Entitlement grants are typically provided to schools each year on a noncompetitive basis. Federal entitlement grant funds include, but are not limited to Title I, Title II, Title III, Title IV Part A, and Individuals with Disabilities Education Act (IDEA). Competitive grants include, but are not limited to Charter School Planning and Implementation Grant, Charter School Facilities Grant, or any state or private grant that requires a proposal response and selects a limited number award recipients based on pre-set criteria.

Grant Application Process – The Grant Coordinator shall obtain the annual entitlement amounts from the appropriate state or district representative and begin the grant development process with the appropriate

stakeholders. The Grant Coordinator shall obtain the competitive grant information from federal, state, local or private activities and determine whether the grant(s) is appropriate for the schools supported. Some competitive grants may have matching-funds and/or in-kind payment requirements which may place a burden on the school's available financial resources.

The federal and state Department of Education (DOE) or webpages provides a wealth of information related to available grants; such as, general and fiscal guidelines, program guidelines, program-specific provisions and assurances, general provisions and assurances, debarment and suspension certification, lobbying certification, sample applications and deadlines and due dates for grant application, amendments and grant reporting. All Grant Coordinators involved in the management of federal grant awards shall be aware of these resources.

All grant applications that support student instruction at one or more campuses, must be developed in collaboration with the respective campus principal(s). Specific grant activities to support the academic program at a campus should be reflected in the school-wide plan, school improvement plan or school strategic plan.

The final approval of a grant application shall be the State Director, Superintendent or designee.

The Grants Coordinator shall work collaboratively with the Directors of Accounting and Finance to ensure that all grant budgets are identified using the appropriate account code structure.

No federal grant funds shall be budgeted, encumbered (committed, obligated or expensed) until the following has occurred:

- grant has been approved by the granting agency and a Notice of Grant Award (NOGA) has been issued; or
- the entitlement grant has been received by the Grant Coordinator and the grant application has been submitted to State DOE or DPI approving activity.

The finance department shall notify the grants management department when the funds have been budgeted and are ready for expenditure by the appropriate campus or department.

General Provisions and Assurances: General Provisions and Assurances apply to all grants administered by CSUSA. Additional provisions and assurances may apply to specific grants. The Grant Coordinator shall inform all staff involved in the expenditure of grant funds of the provisions and assurances for each grant program, as appropriate.

Certification Regarding Debarment, Suspension, Ineligibility, and Voluntary Exclusion: Per Executive Order 11246, as amended; Section 503 of the Rehabilitation Act of 1973, as amended 29 U.S.C. Section 793; and/or the Vietnam Era Veterans' Readjustment Assistance Act of 1974, as amended, 38 U.S.C. Section 4212, CSUSA will not use funds from federal, state, local or private grants, to purchase goods and services from vendors who have been debarred or suspended from doing business with the federal government.

Debarment is defined as an action taken by a government official to exclude a person or entity from participating in federal transactions. Suspension is defined as a disqualification from participating in federal transactions for a period because the company or individual is suspected of engaging in seriously improper conduct, which may lead to debarment.

To ensure that CSUSA is not doing business with vendors who have been suspended or debarred from doing business with the federal government, the Grant coordinator will review the System for Award Management (SAM) debarment list on a monthly basis. For information on how to find the list of debarred companies, refer to the Office of Federal Contract Compliance Programs (OFCCP) Debarred Companies website instructions at <https://www.dol.gov/ofccp/regs/compliance/preaward/debarlst.htm>.

All purchase orders with new or non-standard vendors will be checked against the SAM debarment list before the purchase order is approved. If a CSUSA vendor is found on this debarment list with a date that precedes payment to that vendor, the purchase order will be stopped and all activity with the vendor will be immediately terminated. Upon this finding, the Accounts Payable office will be immediately notified that this vendor has been debarred or suspended from doing business with the federal government.

The link to the current Executive Order 12549 is:

<https://obamawhitehouse.archives.gov/sites/default/files/omb/assets/omb/fedreg/2004/031126.pdf>

Lobbying Certification: For all federal grants in excess of \$100,000, the Grant Coordinator shall certify on the grant application that no federal grant funds are expended for the purpose of lobbying. The Purchasing Coordinator and Director of Finance shall ensure that all contract award documents utilizing federal grant funds contain statements specifying the limit of lobbying activity.

Budgeting Grant Funds: The Grant Coordinator in collaboration with the State Director, School Principal and SOA shall budget grant funds in the appropriate fund code as authorized by the granting agency. In addition, the function code/object class expenditure codes noted on the grant application shall be consistent with the budgeted account codes.

Federal grant funds shall be budgeted and available for use after receipt of the NOGA. Expenditures made prior to the NOGA will not be approved and the cost for the item will be redirected to operational funds.

Budget amendments, if any, shall be approved by the Grant Coordinator to ensure that the reclassification of funds is allowable under the grant management guidelines. Some grants allow a transfer of funds, up to 10% of the function/object class approved amount, but only within the same function/object class and if the new item does not require specific approval from the granting agency.

Federal regulations require that the school amend the grant application when schools deviate from the original scope or grant objectives. Other amendments may be necessary when the designated Grant Coordinator changes or when grant funded staff change.

The Grant Coordinator shall monitor the need for amendments at least quarterly throughout the grant period, at grant mid-year and six weeks prior to the grant amendment deadline. If an amendment is necessary for any of the reasons specified by the state DOE or in federal regulations, the Grant Coordinator shall initiate the amendment process and collaborate with the State Director, School Principal, and SOA prior to submission of the grant amendment. The approval process of a grant amendment shall be the same as the grant application process.

The Grant Coordinator shall be responsible for ensuring that the grant financial management ledger corresponds to the most recent grant NOGA.

Standards for Financial and Program Management - The school must comply with all requirements of federal grant awards including the provisions of the Federal Funding Accountability and Transparency Act (FFATA) and the Dun and Bradstreet Data Universal Numbering System (DUNS) as the Financial Assistance Use of Universal Identifier and Central Contractor Registration (CCR) system. As stated in 2 CFR § 25.100

all organizations who are applicants for Federal financial assistance, as well as the recipients and their direct subrecipients shall obtain a DUNS and register their company in the System for Award Management (SAM) as the repository for standard information. The SAM web site is <https://www.sam.gov/SAM/>.

FFATA Reporting - The Grant Coordinator shall report the following for all federal grant awards, as required by state DOE offices.

1. The following data about sub-awards greater than \$25,000
 - a. Name of entity receiving award [entity = school]
 - b. Amount of award
 - c. Funding agency
 - d. North American Industry Classification System (NAICS) code for contracts / Catalog of Federal Domestic Assistance (CFDA) program number for grants
 - e. Program source
 - f. Award title descriptive of the purpose of the funding action
 - g. Location of the entity
 - h. Place of performance
 - i. Unique identifier of the entity and its parent; and
 - j. Total compensation and names of top five executives (same thresholds as for primes)
2. The total compensation and names of the top five executives if:
 - a. More than 80% of annual gross revenues from the federal government, and those revenues are greater than \$25M annually; and
 - b. Compensation information is not already available through reporting to the State Education Agencies (SEA).

Financial Management: The grant financial management ledger will be used track budgets, commitments, obligations and expenses for all federal, state, local and private sector grant expenditures. The grant financial management ledger shall be maintained in a manner that provides adequate internal controls over the data integrity, security and accuracy of the financial information.

The information maintained shall include all grant allotments, periods of performance, grant type, school name and location, authorizations, obligations, unobligated balances, assets, expenditures, income and interest and be supported by source documentation. All expenditures of federal grant funds shall be in managed in accordance with CSUSA's written procedures such as cash management, accounts payable, purchasing, travel, allowable costs, capital asset tracking, contract management, and other procedures, as appropriate.

The financial management system shall be utilized to store, maintain, and report all required federal grant information. Consequently, the Grant Coordinator shall ensure that access to the data is restricted to authorized individuals in accordance with the grant focused data and access requirements specified in this manual. In addition, the Grant Coordinator shall retain all federal grant records in accordance with the

records retention requirements also set forth in this manual. The Grant Coordinator shall be responsible to ensure that all grant records are retained, stored and accessible, as appropriate.

A list of all federal grant awards shall be maintained to include all EDGAR required data and school-required information listed below:

- The CFDA title and number
- Federal award identification number and year
- Name of the Federal or state agency issuing the grant
- Name of the pass-through entity issuing the grant, if applicable

On at least a quarterly basis, the State Director, Superintendent, School Principal, SOA and Grant Coordinator shall review the status of each federal, state or private sector grant fund. The review shall include a comparison of budget to expenditures.

Internal Controls - The CSUSA internal control procedures over financial management shall be made available to all staff involved in the management of federal grant funds. The internal control procedures shall be reviewed on at least an annual basis and updated as appropriate. If any weakness in an internal control is detected, the internal control procedures shall be revised to incorporate the weakness(es) at either the annual review or as the need arises dependent upon the severity (materiality) of the weakness.

Adequate internal control is a key defense (but no guarantee) against fraud, waste and program abuse. All CSUSA staff have a responsibility to reduce the risk of fraud, waste and program abuse by implementing effective internal controls that adequately safeguards assets. In the event of conflict between these standards and federal statute or regulation, the federal statute or regulation will apply. Individuals who suspect fraud, waste, or program abuse may report the matter to the State Director of Superintendent.

In accordance with the Grants Management Common Rule codified by the federal Department of Education at 34 CFR § 80, CSUSA must maintain effective internal control and accountability for all grant and subgrant cash, real and personal property, and other assets. CSUSA staff must adequately safeguard all such property and must assure that it is used solely for authorized purposes.

The Office of Management and Budget (OMB) Circular A-133 Compliance Supplement is a useful tool in defining what constitutes “effective internal controls” in that it provides guidance for understanding and evaluating internal control. The guidance in Part 6 of the OMB Circular A-133 Compliance Supplement reflects the definition and description of internal control as published by the Committee of Sponsoring Organizations (COSO) of the Treadway Commission in its report, “Internal Control-Integrated Framework” (COSO Report).

Components of Internal Control - Internal controls shall be designed, implemented and evaluated based on the ability of the controls to provide reasonable assurance for compliance with applicable requirements in a cost-effective manner.

The OMB Circular A-133 Compliance Supplement provides assistance in complying with internal control and audit requirements by identifying types of compliance requirements and describing for each, the objective of internal control and certain characteristics of internal control that, when present and operating effectively, may ensure compliance with program requirements. The guidance, however, is not intended as a “checklist of required internal controls characteristics.” Judgment will need to be exercised in determining the most appropriate and cost-effective internal control in a given environment or circumstance to provide reasonable assurance for compliance with program requirements.

The types of compliance requirements are primarily described in Parts 3 and 6 of the Compliance Supplement. Part 3 provides fourteen types of compliance requirements that it identifies as being generic to most federal programs that are administered by entities subject to the audit requirements of OMB Circular A-133. Part 6 describes internal control characteristics for thirteen of these fourteen types of compliance requirements (all except those pertaining to special tests and provisions). The five components of internal control are:

- **Control Environment.** The control environment “sets the tone of an organization and influences the control consciousness of its people.” It provides structure and discipline and forms the foundation for all other components of internal control.
- **Risk Assessment.** Risk assessment refers to the “identification, analysis, and management of risks relevant to the preparation of financial statements that are fairly presented in conformity with generally accepted accounting principles [GAAP] (or another comprehensive basis of accounting).”
- **Control Activities.** Control activities are the policies and procedures that help ensure that management’s directives are carried out.
- **Information and Communication.** The identification capture and exchange of information in a form and timeframe that enables people to carry out their responsibilities.
- **Monitoring.** In relation to the COSO report and SAS 78, monitoring refers to the process used to assess the quality of internal control performance over time.

Fraud, Waste or Abuse - Fraud, program abuse, including waste, possible illegal expenditures, unlawful activity, violations of law, rules, or policies and procedures occurring under any grant are prohibited. Suspicion of such misuse must be reported to the State Director, Superintendent or designee no later than five business days from the date of discovery of such act.

Following internal investigation, CSUSA may elevate any report to the appropriate federal or state authority for action including, but not limited to:

- Further investigation
- Referral for prosecution under the federal or state laws
- Other corrective action, as may be appropriate

CSUSA shall ensure the confidentiality of all reports of violations as listed above except as provided by law or court order. No retaliation shall be taken against any person filing a report.

Bonds - If the granting agency requires that CSUSA in support of the school obtain bonding and/or insurance for a specific project, CSUSA shall ensure that the bonds are obtained from a company that holds a certificate of authority as specific in 31 CFR § 223, Surety Companies Doing Business with the United States. The Director of Finance, or designee, shall be responsible for obtaining insurance and/or bonding, as appropriate.

Payment - Payments to vendors shall be made promptly in accordance with federal regulations and state law.

If the school receives an advance payment from a federal granting agency, the Grant Coordinator shall ensure that the advanced funds are expensed in a timely manner. Excess funds may earn interest, which may require return to the federal granting agency if the interest meets the federal threshold.

The schools shall always seek reimbursement for federal grants. The Grant Coordinator shall coordinate with the schools to prepare and submit a “drawdown” of federal grant funds only after the payments have been made and distributed to the vendor via mail, e-payables or other delivery method. The drawdown of expended funds shall be net of all rebates, refunds, contract settlements, audit recoveries and interest earned, as appropriate. The Grant Coordinator working with the BMs shall be responsible for preparing the drawdown of federal grant funds. All drawdowns shall be reflected on the grant financial management ledger and recorded on the general ledger as a receivable when the drawdown process is complete, and funds are received. Upon receipt the funds will be posted to the cash account.

Cost sharing or matching funds - The Grant Coordinator over each federal grant award shall ensure that requirements for cost sharing and/or matching funds are approved through the grant approval process prior to the submission of the grant. At a minimum, the Grant Coordinator, Director of Finance, and Superintendent/State Director (or designee) must approve the commitment of all cost sharing and matching grant funds.

If cost sharing or matching funds are required as part of a federal grant award, the required direct or in-kind expenditures should be recorded and tracked on the grant financial management ledger. If matching grant funds are required in the General or Operational Fund, the school shall utilize a sub-object to separately track the expenditures for reporting and compliance purposes.

All staff paid with cost sharing and matching funds, shall be subject to the Time and Effort Documentation requirements.

Cost sharing and matching funds that are as a result of donated services or supplies, shall be recorded and tracked in accordance with the federal regulations (CFR §200.306).

Program Income - The school will not generate any program income as part of a federal grant award. The school will not retain any program income earned through a federal grant program.

Period of performance (Obligations) - All allowable grant expenditures shall be incurred during the grant period of performance (i.e. formal approval or begin date and end date/last date of expenditures) of the federal grant award as designated on the NOGA issued by the state or district. The Grant Coordinator shall notify the State Director, School Principals, BMs and the Directors of Finance and Accounting of the grant periods for each federal grant award to ensure compliance as noted below:

- No employee shall be hired and paid from federal grant funds except during the federal grant period.
- No purchase obligation shall be made from federal grant funds except during the federal grant period.
- No payroll or non-payroll expenditures shall be made from federal grant funds except during the federal grant period.

All obligations with federal grant funds must occur during the grant period of performance. Obligations that occur before or after the grant period of performance are not allowable costs. The obligations must be liquidated in accordance with the grant deadlines, especially as they relate to the final drawdown of federal grant funds.

The Grant Coordinator shall monitor the expenditures during the grant period of performance to ensure that the funds are spent in a systematic and timely manner to accomplish the grant purpose and activities.

Procurement Standards/Expenditure of Grant Funds - Expenditures of grant funds shall be through the purchasing, finance or payroll department processes in place for non-grant funds but shall have additional requirements as noted below to ensure full compliance with federal cost principles.

General Procurement Standards - CSUSA shall comply with all EDGAR federal regulations in the management of federal grant awards and state-administered grants. All purchases of equipment, materials and supplies will be made in accordance with all applicable laws and regulations, including state guidance where applicable (e.g., Chapter 143 Article 8 of the North Carolina General Statutes), CFR §200.318(a), Board policy and any school purchasing procedures. All employees involved in purchasing are expected to be familiar with these requirements

The CSUSA Charter Fiscal Agent will ensure that written specifications for desired products are descriptive, clear and incorporate the quality requirements and service needs of CSUSA schools. Unless otherwise mandated by federal or state guidance, CSUSA does not require a minimum number of bids, proposals or quotes required for the purchase of apparatus, goods, supplies and equipment (whether formally or informally bid); however, the Board encourages the SOA or Procurement Manager to obtain at least two (2) bids, proposals or quotes when feasible

Except as otherwise required by law or specified by the Board or governing body, the State Director is delegated the authority to award contracts for the purchase of equipment, material and supplies, involving amounts up to \$10,000. Any purchases or contracts involving expenditures greater than this amount must be approved by the Board or governing body, including noncompetitive proposals. The Director of Procurement and any additional staff deemed appropriate by the State Director will review submissions of bids, proposals or quotes to determine if they are responsive to the CSUSA school specifications and will make recommendations to the State Director. The State Director will award the contract based upon such recommendations or will make a recommendation to the Board or governing body for award of the contract.

The Grant Coordinator must approve any grant purchase prior to encumbrance. The State Director, accounting department, and principal also approve all grant purchases prior to encumbrance.

Equipment, materials and supplies are purchased in accordance with the following requirements.

Formal Bids (\$250,000 or more) - The purchase of apparatus, supplies, materials or equipment for expenditures of \$250,000 or more must be secured through the competitive bid process governed by federal and state guidance. The Procurement Manager or State Director, in consultation with the Director of Procurement is authorized to determine the best method for formally bidding a product or, as appropriate, utilizing one of the exceptions to formal bidding as provided below in section E. The Procurement Manager will oversee the use of any purchasing method and will ensure that all state requirements are met, including advertisement, sealed bids, maintaining records and public opening of bids. The Board authorizes the use of newspaper advertisement, electronic advertisement or both for formal bids; however, the Procurement Manager has the authority to determine which method will be used for a specific purchase or categories of purchases

Awards will be made to the lowest responsible bidder(s) whose bid/proposal meets the requirements and criteria set forth by CSUSA schools, taking into consideration quality, performance and the time specified in the proposal for the performance of the contract.

To be eligible for an award of a contract subject to federal and state guidance, the contractor and its subcontractors, if any, must demonstrate compliance with all applicable provisions of federal and state guidance, including the responsibility to use E-Verify. All contracts awarded must be in writing.

The Board permits the use of the following processes for contracts that require formal bidding.

1. Competitive Sealed Bids – A competitive sealed bid (or invitation to bid) may be used to request the cost of particular goods by providing detailed specifications in advance.
2. Reverse Auction - Pursuant to federal and state guidance, (1), CSUSA schools may use reverse auctions as an alternative to sealed bid procedures. For purposes of this policy, reverse auction means a real-time purchasing process in which bidders compete to provide goods at the lowest selling price in an open and interactive environment. The Procurement Manager or State Director in consultation with the Director of Procurement, will determine whether reverse auctions are appropriate for a specific purchase or category of purchases. To conduct a reverse auction, the Procurement Manager may use a third party, may use the state's electronic procurement system or, if appropriate equipment is available, may conduct the auction via school equipment.
3. Exceptions to Formal Bids – Any of the processes outlined below in section E can be used in lieu of formal bidding, if all requirements of state law are met.

Small Purchase (\$10,000.01 to \$250,000) - The purchase of apparatus, supplies, materials or equipment for expenditures of \$10,000.01 to \$250,000 must be secured through the small purchase process (three separate vendor quotes) governed by federal and state guidance. The Procurement Manager, in consultation with the State Director is authorized to determine the best method for informally bidding a product. The Procurement Manager will oversee the use of any purchasing method and will ensure that all state requirements are met. Awards will be made to the lowest responsible bidder(s) whose bid or proposal meets the requirements and criteria set forth by CSUSA schools, taking into consideration quality, performance and the time specified in the proposal for the performance of the contract.

1. Quotations – Small Purchase requirements may be met by the solicitation of quotes from prospective vendors. Quotations may be solicited and submitted via telephone, fax, email or website. Telephone quotes must be placed in writing before a final contract will be awarded. Written quotations must be on the vendor's letterhead or an official quotation.

Purchases of \$10,000 or less

1. Micro Purchases § 200.67 - Acquisition of supplies or services, the aggregate dollar amount of which does not exceed \$10,000 (or \$2,000 in the case of acquisitions for construction subject to the Davis-Bacon Act). Micro-purchases may be awarded without soliciting competitive quotations.

Records of all informal bids will be kept and will be available for public inspection. Such records will include the date the bid is received, from whom it is received, and for what item

Electronic Bidding: Pursuant to federal and state guidance, CSUSA schools may receive bids electronically in addition to or instead of paper bids. If electronic bids are used for purchases that must be formally bid, procedures for receipt of electronic bids must be designed to ensure the security, authenticity and confidentiality of the bids to at least the same extent as provided with paper bids. The Procurement

Manager, in consultation with the State Director, will determine whether electronic bidding is appropriate for a specific purchase or category of purchases

Exceptions to the Formal and Informal Bidding Requirements: CSUSA SCHOOLS may utilize the following purchasing options instead of pursuing competitive bidding for non-federal purchases. Formal or informal bidding is not required if any of these processes are used. The Procurement Manager is responsible for gathering information to document the basis for the use of any exceptions to the competitive bidding requirements. The Procurement Manager, in consultation with the State Director, will determine whether using one of the following exceptions is appropriate for a specific purchase or group of purchases

1. Purchases from Other Governmental Agencies – Pursuant to federal and state guidance, CSUSA schools may contract for the purchase, lease or other acquisition of apparatus, supplies, materials, or equipment from any other federal, state or local governmental agency
2. Special Emergencies – Pursuant federal and state guidance, competitive bidding is not required in cases of special emergencies involving the health and safety of people or their property. For an emergency to exist under the statute, the following factors must exist: (1) the emergency must be present, immediate and existing; (2) the harm cannot be averted through temporary measures; and (3) the emergency must not be self-created by CSUSA schools
3. Competitive Group Purchasing – Pursuant to federal and state guidance, CSUSA schools may make purchases through a competitive bidding group purchasing program, through which another entity uses a competitive process to establish contracts on behalf of multiple entities at discount prices
4. State Term Contract – Pursuant to federal and state guidance, CSUSA schools may purchase products included in state term contracts with the state vendor for the price stipulated in the state contract, if the vendor is willing to extend CSUSA schools the same or more favorable prices, terms and conditions as established in the state contract
5. Sole Source Items – Pursuant to federal and state guidance, upon approval of the Board, CSUSA schools may purchase an item through a single/sole source contract under the following circumstances: (1) when performance or price competition is not available; (2) when a needed product is available from only one source of supply; or (3) when standardization or compatibility is the overriding consideration. When requesting a purchase under the sole source exception, the State Director will provide the Board with documentation that justifies the use of the exception
6. “Piggybacking” or Previously Bid Contracts – Pursuant to federal and state guidance, upon approval of the Board of education, CSUSA schools may purchase from any supplier that, within the previous 12 months, has contracted to furnish the needed item to the federal government, to any state government, or to any agency or political subdivision of the federal government or any state government. Before recommending a purchase using the piggybacking exception, the Procurement Manager will ensure that the following requirements are met: (1) the price and other terms and conditions of the contract are at least as favorable as the prior contract; (2) the contract was entered into following a bid process substantially similar to that required by North Carolina General Statutes; (3) the same vendor is used; and (4) notice of intent to award the contract without bidding is publicly advertised at least 10 days prior to the regularly-scheduled Board meeting at which the contract will be approved. Before approving the contract, the Board must determine that using the contract is in the best interest of CSUSA schools.
7. Purchases of Information Technology Goods and Services – Pursuant to federal and state guidance, CSUSA schools may purchase or lease information technology through contracts established by the State Office of Information Technology Services. The Procurement Manager will work with the information technology department to ensure that any such purchases meet

the needs of CSUSA schools In addition, CSUSA schools also may purchase information technology goods and services by using a request for proposal (RFP) Pursuant to federal and state guidance,, provided that the following requirements are met: (1) notice of the request is provided consistent with the formal bidding notice requirements and (2) contracts are awarded to the person or entity that submits the best overall proposal as determined by the Procurement Manager. The RFP should describe the scope of work, general terms and conditions, specifications of the product needed by CSUSA schools, and the application process. The information technology supervisor will assist the purchasing officer in reviewing the responsiveness of any RFP submitted pursuant to this subsection. RFPs will be evaluated using the “best value” method as defined in federal and state guidance, so that the school can select the most appropriate technological solution to meet CSUSA schools ’s objectives. However, in situations where the purchasing officer considers the purchase to be highly complex or is unable to clearly determine what the optimal solution for CSUSA Schools is, the “solution-based solicitation” or “government-vendor partnership” method may be used. The Procurement Manager may negotiate with the proposer to obtain a final contract that meets the best needs of CSUSA Schools, as long as the alterations based on such negotiations do not deprive proposers/potential proposers of the opportunity to compete for the contract and do not result in the award of the contract to a different person or entity than it would have been if the alterations had been included in the RFP.

8. Gasoline, Fuel and Oil Purchases – Pursuant to federal and state guidance, CSUSA schools may purchase gasoline, fuel and oil products without using formal competitive bidding. However, such purchases are subject to the informal bidding requirements described above.
9. Used Products – Pursuant to federal and state guidance, CSUSA schools may purchase previously used apparatus, supplies, materials or equipment without using formal competitive bidding. Before purchasing used products, the Procurement Manager will ensure that the products are in good, usable condition and will be sufficient to meet CSUSA school’s needs for a reasonable period

Historically Underutilized Businesses §200.321: CSUSA schools will take the following affirmative steps to assure the use of historically underutilized businesses when possible:

1. Placing qualified small and minority businesses and women's business enterprises on solicitation lists.
2. Assuring that small and minority businesses, and women's business enterprises are solicited whenever they are potential sources.
3. Dividing total requirements, when economically feasible, into smaller tasks or quantities to permit maximum participation by small and minority businesses, and women's business enterprises.
4. Establishing delivery schedules, where the requirement permits, which encourage participation by small and minority businesses, and women's business enterprises.
5. Using the services and assistance, as appropriate, of such organizations as the Small Business Administration and the Minority Business Development Agency of the Department of Commerce.

Requiring the prime contractor, if subcontracts are to be let, to take the affirmative steps listed in 1 through 5.

Contract cost and price §200.323: CSUSA schools will perform a cost or price analysis in connection with every procurement action in excess of the Simplified Acquisition Threshold (\$250,000) including contract modifications. The method and degree of analysis is dependent on the facts surrounding the procurement situation, but as a starting point, CSUSA schools will make an independent estimate before receiving bids or proposals.

The cost analysis or price analysis, as appropriate for the situation, will be documented in the procurement files. Accordingly, CSUSA schools performs a cost or price analysis in connection with every federal procurement action in excess of \$250,000 including contract modifications, as follows:

Cost Analysis → **Noncompetitive Contracts:** A cost analysis involves a review of proposed costs by expense category, and the federal cost principles apply, which includes an analysis of whether the costs are allowable, allocable, reasonable, and necessary to carry out the contracted services. In general,

- A cost analysis must be used for all noncompetitive contracts, including sole source contracts.
- The federal cost principles apply.
- All noncompetitive contracts must also be awarded and paid on a cost-reimbursement basis, and not on a fixed-price basis.
- In a cost-reimbursement contract, the contractor is reimbursed for reasonable actual costs incurred to carry out the contract.
- Profit must be negotiated as a separate element of the price in all cases where there is no competition.

When performing a cost analysis, profit is negotiated as a separate element of the price. To establish a fair and reasonable profit, consideration is given to the complexity of the work to be performed, the risk borne by the contractor, the contractor's investment, the amount of subcontracting, the quality of its record of past performance, and industry profit rates in the surrounding geographical area for similar work.

Price Analysis → **Competitive Contracts:** A price analysis determines if the lump sum price is fair and reasonable based on current market value for comparable products or services. In general,

- A price analysis can only be used with competitive contracts and is usually used with fixed-price contracts. It cannot be used with noncompetitive contracts.
- Compliance with the federal cost principles is not required for fixed-price contracts, but total costs must be reasonable in comparison to current market value for comparable products or services.

A competitive contract may be awarded on a fixed-price basis or on a cost-reimbursement basis. If awarded on a cost-reimbursement basis, the federal cost principles apply and costs are approved by expense category, and not a lump sum

A cost analysis will be completed for any noncompetitive contract over \$250,000. A price analysis will be used for all competitive contracts over \$250,000. The analysis will be conducted by the Director of Procurement or the designated staff member for the contract. Analyses should include prior procurements and other market research. The analysis should yield an acceptable price range prior to receiving bids/proposals. Administrative oversight is provided by the Chief Financial Officer.

Costs or prices based on estimated costs for contracts are allowable only to the extent that costs incurred, or cost estimates included in negotiated prices would be allowable costs under the federal cost principles.

Rebates and credits §200.406 - Applicable credits refer to those receipts or reduction-of expenditure type transactions that offset or reduce expense items allocable to the Federal award as direct or indirect costs. Examples of such transactions are: purchase discounts, rebates or allowances, recoveries or indemnities on losses, insurance refunds or rebates, and adjustments of overpayments or erroneous charges. To the extent that such credits accruing to or received by CSUSA schools relate to allowable costs, they must be credited to the Federal award either as a cost reduction or cash refund, as appropriate.

Contractor Oversight §200.318(b) – CSUSA Schools strive to ensure that contractors perform in accordance with the terms, conditions, and specifications of their contracts or purchase orders and to ensure proper administration of contracts as follows:

Contractors §200.330(b) - A contract is for the purpose of obtaining goods and services for the use CSUSA schools and creates a procurement relationship with the contractor. Characteristics indicative of a procurement relationship between CSUSA Schools and a contractor are when CSUSA schools the recipient of Federal funds:

- Provides the goods and services within normal business operations
- Provides similar goods or services to many different purchasers;
- Normally operates in a competitive environment;
- Provides goods or services that are ancillary to the operation of the Federal program; and
- Is not subject to compliance requirements of the Federal program as a result of the agreement, though similar requirements may apply for other reasons.

All the characteristics listed above may not be present in all cases, and therefore best judgment must be used in classifying each agreement as a subaward or a procurement contract

Conflicts of interest §200.318(c)(1) – CSUSA Schools will maintain written standards of conduct covering conflicts of interest and governing the performance of its employees engaged in the selection, award and administration of contracts. Such a conflict of interest would arise when the employee, officer, or agent, any member of his or her immediate family (spouse, children, parents), his or her partner, or an organization which employs or is about to employ any of the parties indicated herein, has a financial or other interest in or a tangible personal benefit from a firm considered for a contract. Minimum policy requirements include the following:

- No employee, officer, or agent must participate in the selection, award, or administration of a contract supported by a Federal award if he or she has a real or apparent conflict of interest.
- The officers, employees, and agents of CSUSA schools must neither solicit nor accept gratuities, favors, or anything of monetary value from contractors or parties to subcontracts.
- However, non-Federal entities may set standards for situations in which the financial interest is not substantial, or the gift is an unsolicited item of nominal value.
- The standards of conduct must provide for disciplinary actions to be applied for violations of such standards by officers, employees, or agents of the non-Federal entity.

Anyone in a position to make decisions about spending CSUSA school resources (i.e., transactions such as purchases contracts) – who also stands to benefit from that decision has a duty to disclose that conflict as soon as it arises (or becomes apparent). He or she should not participate in any final decisions

Mandatory Disclosure §200.112 §200.113 - CSUSA schools must disclose in writing any potential conflict of interest to the Federal awarding agency or pass-through entity in accordance with applicable Federal awarding agency policy.

CSUSA schools must disclose, in a timely manner, in writing to the Federal awarding agency or pass-through entity all violations of Federal criminal law involving fraud, bribery, or gratuity violations potentially affecting the Federal award. Failure to make required disclosures can result in any of the remedies described in §200.338 Remedies for noncompliance, including suspension or debarment.

Avoiding Acquisition of Unnecessary or Duplicative Items §200.318(d) – CSUSA schools will avoid acquisition of unnecessary or duplicative items. Consideration should be given to consolidating or

breaking out procurements to obtain a more economical purchase. Where appropriate, CSUSA schools will perform an analysis of lease versus purchase alternatives, and any other appropriate analysis to determine the most economical approach.

Identifying responsible contractors §200.318(h) – CSUSA schools will award contracts only to responsible contractors possessing the ability to perform successfully under the terms and conditions of a proposed procurement. Consideration will be given to such matters as contractor integrity, compliance with public policy, record of past performance, and financial and technical resources.

Debarment and Suspension §180.220 and §180.300) CSUSA schools will verify State and Federal debarment and suspension for procurement activities where Federal funds are being used as stated in section [Certification Regarding Debarment, Suspension, Ineligibility, and Voluntary Exclusion](#) above.

The following debarment certification statement is required on all contracts and federal expenditures. The debarment certification reads as follows:

This contractor is not debarred per Federal Excluded Parties List
(www.sam.gov/portal/public/SAM) Initials ____ Date _____

Recordkeeping §200.318(i) – CSUSA Schools will maintain records sufficient to detail the history of procurement. These records will include, but are not necessarily limited to the following:

- Rationale for the method of procurement (i.e., the reason CSUSA schools chose procurement by micro-purchase, small purchase procedures, sealed bid, competitive proposals, or noncompetitive proposals),
- selection of contract type (including rationale for using that type),
- contractor selection or rejection (what was the process and what were the factors considered in selecting or rejecting the contractor; this must be in writing), and
- the basis for the contract price (including a cost or price analysis if applicable)

Settlements of Issues Arising Out of Procurements §200.318(k) - CSUSA schools alone is responsible, in accordance with good administrative practice and sound business judgment, for the settlement of all contractual and administrative issues arising out of procurements.

Competition §200.319(a) - All procurement transactions are conducted in a manner providing full and open competition. In order to ensure objective contractor performance and eliminate unfair competitive advantage, contractors that develop or draft specifications, requirements, statements of work, or invitations for bids or requests for proposals (RFPs) are excluded from competing for such procurements. Some of the situations considered to be restrictive of competition include but are not limited to:

1. Placing unreasonable requirements on firms for them to qualify to do business;
2. Requiring unnecessary experience and excessive bonding;
3. Noncompetitive pricing practices between firms or between affiliated companies;
4. Noncompetitive contracts to consultants that are on retainer contracts;
5. Organizational conflicts of interest;
6. Specifying only a “brand name” product instead of allowing “an equal” product to be offered and describing the performance or other relevant requirements of the procurement; and
7. Any arbitrary action in the procurement process.

The Director of Procurement is responsible for reviewing documentation for each procurement transaction to ensure CSUSA schools is in compliance with these requirements and for monitoring the review and determinations.

Geographical Preferences Prohibited §200.319(b) - The CSUSA schools will conduct procurements in a manner that prohibits the use of statutorily or administratively imposed state, local, or tribal geographical preferences in the evaluation of bids or proposals, except in those cases where applicable federal statutes expressly mandate or encourage geographic preference. When contracting for architectural and engineering (A/E) services, geographic location may be a selection criterion provided its application leaves an appropriate number of qualified firms, given the nature and size of the project, to compete for the contract.

Solicitation Language §200.319(c) - CSUSA schools' procedures will ensure that all solicitations incorporate a clear and accurate description of the technical requirements for the material, product, or service to be procured.

- Such description must not, in competitive procurements, contain features which unduly restrict competition.
- The description may include a statement of the qualitative nature of the material, product or service to be procured and, when necessary, must set forth those minimum essential characteristics and standards to which it must conform if it is to satisfy its intended use.
- Detailed product specifications should be avoided if possible.
- When it is impractical or uneconomical to make a clear and accurate description of the technical requirements, a "brand name or equivalent" description may be used to define the performance or other salient requirements of procurement. The specific features of the named brand which must be met by offers must be clearly stated; and
- Solicitation language must also identify all requirements which the offerors must fulfill and all other factors to be used in evaluating bids or proposals

Prequalified Lists §200.319(d) - CSUSA schools will ensure that all prequalified lists of persons, firms, or products which are used in acquiring goods and services are current and include enough qualified sources to ensure maximum open and free competition. Also, CSUSA schools will not preclude potential bidders from qualifying during the solicitation period.

Cost Principles - All grant expenditures must be allowable under the Federal Cost Principles (2 CFR § 200 – Subpart E), the grant application program assurances, the granting agency's policies, and CSUSA policies and procedures.

CSUSA shall adhere to the Cost Principles for federal grants [EDGAR SUBPART E] and any additional grant-specific cost principles. The general principles of EDGAR state that:

- Costs must be reasonable and necessary
 - A cost is reasonable if, in its nature and amount, it does not exceed that which would be incurred by a prudent person under the circumstances prevailing at the time the decision was made to incur the cost.
 - Necessary is defined as costs needed to carry out the grant activities
- Be allocable to Federal awards
- Be authorized or not prohibited under State or local laws or regulations.
- Conform to any limitations or exclusions set forth in these principles, Federal laws, terms and conditions of the Federal award, or other governing regulations as to types or amounts of cost items.

- Be consistent with policies, regulations, and procedures that apply uniformly to both Federal awards and other activities of the governmental unit.
- Be accorded consistent treatment. A cost may not be assigned to a Federal award as a direct cost if any other cost incurred for the same purpose in like circumstances has been allocated to the Federal award as an indirect cost.
- Except as otherwise provided for in EDGAR, be determined in accordance with generally accepted accounting principles.
- Not be included as a cost or used to meet cost sharing or matching requirements of any other Federal award in either the current or a prior period, except as specifically provided by Federal law or regulation.
- Be the net of all applicable credits.
- Be adequately documented.

The Grant Coordinator shall verify that all proposed obligations and expenditures meet the Cost Principles. If the proposed obligation and/or expenditure is not allowable and/or allocable to a federal grant award, the Grant Coordinator or school shall not make the obligation/purchase with the federal grant funds. Other funds, such as operational funds, may be used to make the obligation/expenditure, as appropriate. The total cost of a federal award is the sum of allowable direct and allocable indirect costs less any applicable credits. All refunds, rebates, discounts or other credits to grant expenditures shall be posted to the finance general ledger as soon as the credit is known. The Grant Coordinator shall ensure that all known credits have been posted to the general ledger prior to the drawdown on federal grant reimbursements. It is essential to post all credits to the grant financial management ledger on a timely basis to ensure that the school does not draw-down grant expenditures in excess of actual expenditures net of all credits. Otherwise, the school may be considered to have drawn-down funds under an advanced cash method which is not authorized. The Grant Coordinator shall ensure that all applicable credits have been posted to the grant financial management ledger prior to preparing and submitting a federal grant draw-down request from the granting or pass-through entity.

An indirect cost rate, whether submitted to a Federal cognizant agency for indirect costs or maintained on file by the school, must be certified by CSUSA using the state based Indirect Cost Rate formulas. The certificate must be signed on behalf of the school by the Director of Accounting and Finance. All school costs with federal grant funds, whether direct or indirect, shall meet the minimum requirements of allowability as specified in the 2 CFR § 200.403. In addition, the costs must meet the general provisions for selected items of cost (2 CFR § 200.420). Specific items not listed within these procedures shall be evaluated by the Grant Coordinator on case-by-case basis for allowability. The general cost allowability rules for specific items of cost listed within these procedures shall apply to all federal grant funds, unless more restrictive allowability rules are required by a particular federal grant award. The school shall adhere to the more restrictive allowability rules when a conflict arises between the general allowability rules, the program-specific allowability rules and the school's allowability rules.

Selected Items of Costs - Costs generally fall under two major categories: 1) compensation/benefits; and 2) non-compensation (supplies, services, travel or equipment).

Compensation & Benefits – Employee (Payroll Expenditures) - Compensation and benefits (payroll expenditures) are allowable costs for personal services rendered by school employees during the period of performance under the federal grants.

Compensation Costs - All payroll expenditures shall be paid in accordance with the federal cost principles. First and foremost, the payroll expenditures must be authorized on the grant application and the duties assigned must be directly related to grant activities. In addition, compensation costs shall be allowable if:

- The costs are reasonable for the services rendered and conforms to the established CSUSA compensation and benefit plans for expenditures with all other funds, i.e. local funds,
- The employees have been employed in accordance with the CSUSA's established hiring procedures, and
- The costs are supported by the appropriate timekeeping, absence tracking, time & effort certifications or other documentation, as appropriate,
- Federally-funded employees shall report all outside employment or professional services rendered to other entities. The external employment and/or professional services shall not conflict with the federally-funded activities with the school,
- Incentive compensation, such as stipends, are paid in accordance with CSUSA's written plans,
- Stipend compensation for other non-federal grant award duties documented by HR. The additional duties shall not conflict with the federally-funded activities with the school,

Benefit Costs - school costs for fringe benefits for federally-funded staff shall be allowable as noted below:

- All benefit costs shall be in accordance with the school's written policies and Employee Handbook
- All leave benefits shall be in accordance with the school's written Leaves and Absences Policy
- The benefit costs shall be distributed equitably at the same allocation rate (percentage) as the base compensation
- The benefit costs were earned and paid during the grant period
- All benefit costs shall be allowable under the Internal Revenue Service, Fringe Benefits Guide (as subjected to taxes, as required by federal statute)

The school shall not charge any benefit costs to a federally-funded grant if the benefit costs are not in accordance with school's written School Board Policy, or other written benefit plan(s).

Documentation of Compensation and Benefit Costs - In addition, to the time and effort reporting requirements, the school shall support all compensation and benefit costs paid with federal grant funds shall be supported by the following documentation:

- Exempt staff
 - Employment agreement, contract, or reasonable assurance, as appropriate
 - Job description signed by the employee with language similar to: Funded by Title I, Part A with the primary purpose of supporting grant activities aimed at improving academic achievement for students struggling to meet state standards.
 - Supplemental duties, if any, shall be supported by a Supplemental Pay Form
 - Absence records, if any
 - Time and Effort documentation, as appropriate (Semi-Annual Certification or the Time and Effort Report)
- Non-Exempt staff
 - Employment agreement, contract, or reasonable assurance, as appropriate
 - Job description signed by the employee with language similar to: Funded by Title I, Part A with the primary purpose of supporting grant activities aimed at improving academic achievement for students struggling to meet state standards.
 - Absence records, if any

- Time and Effort documentation, as appropriate (Semi-Annual Certification, or Time and Effort Report)
- Timekeeping records (actual work hours per workweek) in accordance with the FLSA and the school's timekeeping procedures. The Grant Coordinator, School Principal and SOA shall ensure that the function and object class codes reflected on the grant application (Payroll Summary) are consistent with the HR, payroll and finance records.

Selection of Grant-Funded Staff - The Grants Coordinator shall work collaboratively with the appropriate stakeholders to identify all staff needed to accomplish the grant activities. The Grant Coordinator shall work collaboratively with the School Principal and the SOA to obtain estimated salaries for proposed grant funded staff prior to the completion of the grant application.

The process of approving payroll expenditures from grant funds shall be a collaborative process between Grant Coordinator, School Principal and SOA. Each position plays an essential role in ensuring that all federal grant requirements are met.

The CSUSA approved salary schedule shall be used to compensate all school staff whether paid from local, state or federal grant funds.

The compensation for grant-funded staff shall be allocated to the respective grant program based on the single and/or multiple cost objectives performed by the grant-funded staff. If a grant-funded staff member performs non-grant activities during the day or beyond the normal work day, the compensation for the non-grant activities shall be paid from non-grant funds. Grant-funded staff with more than one cost objective, shall comply with the Time and Effort documentation requirements. Incentive payments, such as performance, attendance, safety, etc. for grant-funded staff shall be allowable with federal grant funds if they are based on the same criteria as non-federal grant funded staff.

Per federal regulations, the final amount charged to each grant award must be accurate, allowable and properly allocated as described below

New Positions - New grant-funded positions shall be created only when a job description has been developed and approved by the State Director, School Principal, SOA and the Grant Coordinator. The Grant Coordinator shall ensure that the position is approved on the grant application and that adequate funds exist to fill the position. The finance and payroll departments shall be notified to ensure that the position is reflected on the general ledger as a grant funded position and is paid using the correct payroll account distribution codes.

New Hires - New staff hired for work in positions that are wholly or partially funded with federal grant funds, shall be hired when a position and funding are both available. Upon separation of an employee, the SOA shall initiate a request to replace the position.

The Grants Coordinator shall review the request to ensure that the position is still authorized and necessary. Changes to the job description, if any, shall be made at this time. The Director of Finance shall review the request to ensure that adequate funds exist in the appropriate account code(s). If funds do not exist, the Director of Finance shall notify the Grants Coordinator to determine if funds will be re-appropriated to the account code(s). After approval from the Grants Coordinator and Director of Finance, and the State Director, the Human Resources department shall advertise the position.

Upon employment, the new hire shall receive and sign a copy of their offer letter and respective job description to include the grant funding source. **NOTE:** If the position is funded with a short-term grant

fund, the employee shall be notified in writing when the grant funding will lapse, especially if their position will lapse at the end of the grant.

Transfer of Personnel - When staff in a position funded with grant funds is recommended for transfer to another assignment, the Grant Coordinator and the SOA shall work collaboratively to ensure that the appropriate staff allocations and funding changes are made at the time of the transfer. The grants management, human resources and finance departments must evaluate the requested transfer to ensure that the staff allocations, highly qualified staff requirements, and funding source changes are in compliance with grant requirement.

Substitute Teachers - Salary expenditures for substitute teacher are allowable for approved teacher positions. The Grant Coordinator and SOA shall ensure that the expenditures for substitute teacher costs are budgeted and expensed from the appropriate account code(s).

Stipends, Incentives and Extra Duty Pay – Stipends, incentives and extra duty pay expenditures are allowable for authorized and approved activities. A schedule or work log shall be maintained to substantiate the stipend and/or extra duty pay. It is recommended that a job description for each stipend role include the duties related to the grant purpose and the grant funding source.

The Grant Coordinator and SOA shall ensure that the expenditures for stipend and extra duty pay are budgeted and expensed from the appropriate account code(s).

Job descriptions for all grant funded staff - The Grant Coordinator and SOA shall maintain job descriptions for all school staff that are wholly or partially funded with grant funds. The job offer letter shall include the funding source and the job duties as they relate to the grant position. The grant-funded staff shall sign the job offer letter at start of employment under this position.

Roster of all grant funded staff - The Grant Coordinator shall maintain an up-to-date roster of all grant funded staff to include the position title, annual salary, and funding source(s) by percentage. The roster of grant funded staff shall include all staff paid with non-federal grant funds whose compensation/ benefits are paid as part of a matching or cost sharing requirement of a federal grant fund. The Grant Coordinator, SOA and payroll departments shall work collaboratively to ensure that the roster accurately reflects that data maintained in their respective area of responsibility. Discrepancies, if any, in the roster shall be brought to the attention of the Grant Coordinator. The review of the roster shall include, but not be limited to the following:

- SOA – ensure that the position title and salary are correct as noted on the roster. In addition, the SOA shall ensure that each grant funded staff member has a signed job offer and job description on file for the position title noted on the roster.
- Finance – ensure that the funding source(s) and salary are correct as noted on the roster.
- Grant Coordinator – ensure that the positions are authorized on the grant application

The review shall occur on at least an annual basis, or more frequently, throughout the school year to ensure that the roster of grant funded staff is accurate and up-to-date.

Budgeting of grant funded staff - The roster of grant funded staff shall be the basis for budgeting of grant funded staff. The percentage of time in each funding source shall be utilized by the Grant Coordinator to create and enter the salary portion of the grant budget. The percentages shall also be utilized by the payroll department to enter the payroll distribution account code(s). In addition, the Grant Coordinator shall ensure that the grant application matches the budget and payroll account code(s).

The Grants Coordinator, School Principal and SOA shall work collaboratively to adjust the budget and payroll account code distributions of grant funded staff if the time and effort documentation consistently reflects that the percentage(s) across the funding source(s) is not a true reflection of the normal work schedule.

Semi Annual Certification - The staff funded 100% from one grant source do not have to maintain periodic time and effort records but shall complete a Semi-Annual Certification form. This form is required at least semi-annually and certifies that they worked solely on the program for the period covered by the certification. The employee and School Principal must sign the Semi-Annual Certification Form. The timeline for semi-annual certifications shall be once per academic semester to coincide with teaching assignment each semester. The Grant Coordinator shall maintain all signed semi-annual certifications with the appropriate grant files for audit purposes.

The Grant Coordinator, School Principal and SOA shall review all forms to ensure that every staff member has certified that their schedule is 100% grant related and to verify the working schedule is 100% grant related. Any certifications that reflect a percentage other than 100% shall be forwarded to the School Principal and SOA for adjustment of the grant payroll expenditures for the certification period. Steps should also be taken to ensure that the staff member's work schedule is adjusted to 100% grant related or is changed from the semi-annual certification method to time and effort reporting.

Time and Effort Documentation - All staff funded wholly or partially with federal grant funds shall comply with federal guidelines related to time and effort. The grant funded staff, School Principals, State Directors, BMs, and Grant Coordinators shall be aware of the federal guidelines related to time and effort documentation. On a least an annual basis, all impacted staff shall be trained by the Grant Coordinator or SOA on how to complete the required forms. The Grant Coordinator and SOA shall collect and monitor time and effort documentation for school employees only. Time and effort documentation does not apply to Independent Contractors. The school shall comply with all federal time and effort documentation guidelines.

Time and effort requirements staff split funded (funded from more than one (1) cost objective and/or grant programs) - Time and effort applies to employees who do one or more of the following:

- Do not work 100% of their time in a single grant program.
- Work under multiple grant programs.
- Work under multiple cost objectives.

These employees are required to maintain a Time and Effort Worksheet or account for their time under a substitute system. Employees must prepare time and effort reports at least twice monthly to coincide with the school pay periods. Such reports must reflect an after-the-fact distribution of 100 percent of the actual time spent on each activity and must be signed by the employee and the School Principal. Charges to payroll must be adjusted to coincide with preparation and submittal of the interim expenditure report required for discretionary grants.

- The employee shall submit all signed time and effort reports to the SOA who will forward copies to the Grant Coordinator. The Grant Coordinator review shall consist of the following:
- A review of the time and effort reports to compare the summary percentage of grant related work per funding source to the budgeted percentage utilized to charge the monthly (or semi-monthly) payroll charges

- A test sampling of staff assignments, i.e. master schedule, duty schedule, etc. to verify the percentage of grant-related work per funding source
- If the time and effort report reflects the same percentage, the report may be filed for audit purposes
- If the time and effort report reflects a different percentage, the report shall be reconciled to reflect the correct payroll charges by grant funding source and forward the reconciliation to the SOA for adjustment of the payroll charges.

Allowable Costs - In accordance with CFR §200.302(b)(7) CSUSA schools will maintain written procedures for determining allowability of costs.

When determining how CSUSA schools will spend grant funds, the State Director, Grant Coordinator, School Principal and the SOA (SOA) will review the proposed cost to determine whether it is an allowable use of federal grant funds before obligating and spending those funds on the proposed goods or services. All expenditures made with federal education funds must meet the standards outlined in EDGAR, 2 CFR § 3474, and 2 CFR § 200. The State Director, Grant Coordinator, School Principal and the SOA shall consider the following factors when making an allowability determination:

- §200.403(a) - Be necessary and reasonable for the performance of the Federal award and be allocable thereto under these principles.
- §200.403(b) - Conform to any limitations or exclusions set forth in these principles or in the Federal award as to types or amount of cost items.
- §200.403(c) - Be consistent with policies and procedures that apply uniformly to both federally-financed and other activities of CSUSA schools.
- §200.403(d) - Be accorded consistent treatment. A cost may not be assigned to a Federal award as a direct cost if any other cost incurred for the same purpose in like circumstances has been allocated to the Federal award as an indirect cost.
- §200.403(e) - Be determined in accordance with generally accepted accounting principles (GAAP), except, for state and local governments and Indian tribes only, as otherwise provided for in this part.
- §200.403(f) - Not be included as a cost or used to meet cost sharing or matching requirements of any other federally-financed program in either the current or a prior period.
- §200.403(g) - Be adequately documented.

Necessary Costs - Necessary is determined based on the needs of the program. Specifically, the expenditure must be necessary to achieve an important program objective. This means it is vital or required in order to meet the objectives of the grant or for the grant to be successful. Necessary does not mean “nice to have,” which means it is not necessary to accomplish the objectives of the program in that it is not vital or required for the success of the program.

A key aspect in determining whether a cost is necessary is whether CSUSA schools can demonstrate that the cost addresses an existing need and can prove it. For example, CSUSA schools may deem a language skills software program necessary for a limited English proficiency program.

When determining whether a cost is necessary, CSUSA schools shall consider:

- Whether the cost is needed for the proper and efficient performance of the grant program;
- Whether the cost is identified in the approved budget or application;
- Whether there is an educational benefit associated with the cost;

- Whether the cost aligns with identified needs based on results and findings from a needs assessment; and
- Whether the cost addresses program goals and objectives and is based on program data.

Reasonable Costs §200.404 - A cost is reasonable if, in its nature and amount, it does not exceed that which would be incurred by a prudent person under the circumstances prevailing at the time the decision was made to incur the cost.

In determining reasonableness of a given cost, consideration must be given to:

- Whether the cost is of a type generally recognized as ordinary and necessary for the operation of CSUSA schools or the proper and efficient performance of the Federal award.
- The restraints or requirements imposed by such factors as: sound business practices; arm's-length bargaining; Federal, state, local, tribal, and other laws and regulations; and terms and conditions of the Federal award.
- Market prices for comparable goods or services for the geographic area.
- Whether the individuals concerned acted with prudence in the circumstances considering their responsibilities to CSUSA schools, its employees, where applicable its students or membership, the public at large, and the Federal Government.
- Whether CSUSA schools significantly deviates from its established practices and policies regarding the incurrence of costs, which may unjustifiably increase the Federal award's cost.

Allocable Costs §200.405 - A cost is allocable to a specific federal award or other cost objective if the goods or services involved are chargeable or assignable to that Federal award or cost objective in accordance with relative benefits received.

This standard is met if the cost:

- Is incurred specifically for the Federal award;
- Benefits both the Federal award and other work of CSUSA schools and can be distributed in proportions that may be approximated using reasonable methods; and
- Is necessary to the overall operation of CSUSA schools and is assignable in part to the Federal award.

Non-Payroll Expenditures - Direct non-payroll expenditures include contracted services, supplies, travel and equipment. The expenditure of federal grant funds for non-payroll costs shall adhere to the CSUSA purchasing policies and procedures. In addition to the normal purchasing process, all grant funds must be approved by the Grants Coordinator for each respective grant program, as appropriate.

Contracts and Professional Services with Grant Funds - All contracts and professional services' agreements shall be reviewed and approved in accordance with the CSUSA policies and procedures. All contracts that exceed \$50,000 for grant-based procurements shall be approved by the State Director, Superintendent and the Grant Coordinator. All federal grant contracts that exceed \$50,000 shall also be approved by the senior leadership of CSUSA and the school boards or foundations. School Board Policy shall be adhered to in procuring, evaluating, selecting and awarding contracts. The vendor shall complete the following documents:

- Vendor application
- W-9 Form for vendor identification and tax purposes

- Conflict of Interest Questionnaire
- Felony Conviction Notice
- Criminal Background and Fingerprinting (if working directly or indirectly with students)
- Certificate of Insurance (with the school as additional insured) if requested by the school

In addition, the Grant Coordinator shall review and approve all consultant services agreements for compliance with federal regulations regarding professional service costs (2 CFR § 200.459). The Grant Coordinator and Procurement Department review shall consist of the following:

- Consultant and/or contractor has not been suspended or debarred.
- The contract and/or funds have been approved in the grant application, if specific approval is required from the granting agency.
- The contract's nature and scope of service is directly related to the federal grant award activities.
- The past pattern of costs, particularly in the years prior to federal awards.
- The contract does not contain any proposal costs [not allowable under federal regulations]
- Whether the proposed contracted services can be performed more economically by direct employment rather than contracting.
- Capability of the proposed vendor to perform the required services.
- The qualifications of the contracting firm or individual and the customary fees charged by the proposed vendor.
- The contract and/or consultant agreement meets the allowable costs principles. A contract subject to Davis Bacon has the appropriate contract language and/or the contract and/or consultant agreement fee-for-services do not exceed any federal grant or state limits. The final approval authority for all contracts shall be the State Director or Superintendent, unless the contract is over \$50,000 then the final approval authority shall be the senior leadership of CSUSA.

The date the school executes (signs) a contract for professional services shall be defined as the "obligation date". Since the school cannot obligate federal grant funds, except during the grant period, the school shall not execute a contract prior to, or after, a grant period; otherwise, the costs of the professional services shall be unallowable under the federal cost principles. The school may execute a Letter of Intent with a third party prior to the issuance of a NOGA, as deemed appropriate, and if allowable by the specific grant. All school contracts for professional services to be funded through a federal grant award shall comply with the following contract provisions.

- The contract is only effective upon receipt by the school of the NOGA from the awarding agency.
- The contract period is aligned to the grant period of availability as stated on the NOGA from the awarding agency (period of availability).
- All services will be completed during the effective dates of the contract.
- All services will be invoiced monthly after services are received (rather than paid lump sum at the beginning of the period of availability before services are rendered) and paid upon verification of receipt of services.
- The regulations for procurement in 2 CFR § 200.318-323 are followed in issuing the contract.
- All professional services provided under the contract will follow the provisions of 2 CFR § 200.459 Professional service costs.
- The contract identifies the funding sources that will be charged for the services provided, including the specific amount and/or percentage of the total contract amount to be charged to each funding source.

- The contract identifies and lists only reasonable, necessary, and allocable services to be provided during the period of availability of the funding sources listed in the contract.
- The administrative costs charged to the grant in the contract must comply with any limitations for administrative costs for funding sources (if applicable).
- The contract specifies that the invoice provided by the contractor will include the list of services provided, dates of services, and location(s) where services were provided during the billing period.
- The contract shall not have multi-year extensions without a “non-appropriation of funds” cancellation clause
- The contract extensions, if included, shall restrict the contract renewals and/or extensions to either a “sole discretion of the school” or “mutual agreement” and not an “automatic renewal”.
- All products created as a result of the school shall be vested in the school and the school shall retain all intellectual property rights

Approval of Grant Purchases and Expenditures. The school shall adhere to the normal approval path for purchase orders with non-grant funds. In addition, all purchase orders with grant funds shall be reviewed and approved by the appropriate Grant Coordinator. The Grant Coordinator review shall consist of the following:

- The expenditure is reasonable and necessary (as defined in federal grant guidelines).
- The expenditure is not required by state law or local policy.
- The expenditure has been approved in the grant application, if specific approval is required from the granting agency.
- The expenditure meets the allowable costs principles.
- The expenditure is allowable and approved in the grant application and is consistent with the grant purpose.
- The expenditure is supplemental and not supplanting a local.
- The expenditure has been competitively procured as required by law.
- The expenditure has been approved by the governing body, as appropriate.

Credit Card Purchases with Grant Funds - CSUSA will have limited use of credit card purchases for grant funded items. Approval shall be obtained from the State Director and Grant Coordinator prior to the use of a corporate credit card to make purchases for a grant funded item. A written request for a corporate credit card purchase must be submitted by the School Principal to the Grant Coordinator. The Grant Coordinator will determine if the item is an acceptable grant purchase and if there is another manner to fund the item. The Grant Coordinator will forward the recommendation for purchase to the State Director for final approval. If the State Director approves the purchase with a corporate credit card, the following processes shall be followed.

- An original, detailed receipt shall be required for all credit card purchases with federal funds. If the purchaser does not submit an original, detailed receipt for audit purposes, the expenditure and/or reimbursement may not be charged to a federal fund.
- At no time shall corporate credit cards be used to withdraw cash.

The Grant Coordinator shall review and approve all credit card expenditures. The Grant Coordinator administrative review shall consist of the following:

- Original, detailed receipt including an itemized list of what was purchased.
- A documented justification and approval by the State Director
- The credit card purchase shall meet the allowable costs principles

Fraudulent credit card purchases made with federal grant funds shall be grounds for disciplinary action, up to and including termination of employment. The appropriate legal authorities shall also be notified for criminal prosecution, as appropriate. Accidental use of a credit card to make an unauthorized purchase with federal grant funds may be subject to similar disciplinary action but shall require immediate (within 2 days from date of discovery) restitution to the school. The fraudulent or accidental charges may not be charged to a federal grant fund, nor drawn down as expenditures.

Petty Cash Purchases with Grant Funds: No petty cash purchases will be made grant funds for any purpose.

Travel and Professional Development Expenditures with Grant Funds The school may use federal grant funds for travel costs. All travel-related expenditures from grant funds shall comply with the allowable federal cost principles and federal and state travel guidelines. The federal General Services Administration travel and per diem rates can be found at <https://www.gsa.gov/travel/plan-book/per-diem-rates>. The allowable rates of reimbursement shall be the lesser of the federal rates or local rates. The travel-related expenditures with grant funds shall fall within the grant period, unless a specific exception is allowable by the granting agency.

For professional development related travel, School Principals shall review the School Improvement Plan and the Comprehensive Needs Assessment to determine additional knowledge, skills and abilities staff members need to close the gaps identified. This review should be completed in coordination with the State Director and the Grant Coordinator. schools shall always seek options to be good stewards of grant dollars. As such schools shall implement a best practice which is to seek courses locally, within the current state or obtain courses through alternative presentation methods such as webinars or on-line. Another option is to work in partnership with other CSUSA schools to bring in vendor instructors and provide this professional development to a larger audience. These options provide the needed professional development to close our identified gaps while ensuring cost effective and efficient use of grant funds.

The following guidelines shall apply to the expenditure of grant funds.

- All grant funded travel shall be identified and approved by the grant activity prior to any commitment of funds or reservations being completed.
- A Request for Travel and professional development form shall be completed and submitted for approval. The approval process for grant funded professional development is to submit the request for travel and attendance at professional development, using the approved CSUSA form, through the School Principal to the Grant Coordinator. The Grant Coordinator will ensure the professional development was validated and approved by the State Director and that funds are available for this line item on the school approved grant budget. Following this review, the request is sent forward to the State Director with a recommendation for approval/disapproval.
- The approval form must be reviewed by the School Principal, Grant Coordinator and State Director. A completed and final approval of travel and professional development will include approvals at all levels. Failure to obtain approval at any level will constitute a disapproval of travel.
- Registration fees – registration fees shall be allowable if the event is related to grant activities and is included as an authorized expense in the grant application. Registration fees will not be paid prior to an approved grant budget. Recreational or social events subject to an additional fee, above and beyond the registration fee, shall not be allowed with grant funds.

- Meals – meal expenses for overnight travel shall be allowed for school employees and will be paid in accordance with federal and state travel allowance guidelines. Non-overnight travel meals expenses shall not be allowed. The school shall advance or reimburse meal expenses, subject to the federal General Service Administration (GSA) limits, on an accountable per diem basis only. The traveler shall sign the written certification section of the Request for Travel – Final Report form with the actual meal costs for work-related meals, or shall return the unused meal funds to the school. The meal per diems shall be adjusted in accordance with IRS regulations regarding the day of departure/return and meals provided without cost as part of the registration fee.
- Lodging – lodging expenses for overnight travel shall be allowed in accordance with federal and travel guidelines. The school shall pay for lodging expenses up to the GSA limits. Receipts shall be required for all lodging expenses. Recreational or personal services such as gyms, spas, etc. shall not be allowed with grant funds.
- Transportation – transportation expenses shall be allowed in accordance with federal and state travel guidelines for reasonable expenses such as flight, rental car, taxi, shuttle, mileage reimbursement, etc. Receipts shall be required for all transportation expenses to the extent that a receipt is available. Transportation expenses shall be reasonable and limited to the guidance specified by the GSA transportation guidelines.
- No grant funds shall be used for travel expenditures of non-school staff such as spouses and/or family members. The school shall not allow any “family-friendly” travel expenditures such as, dependent care travel costs, with federal grant funds.

The Grant Coordinator shall review and approve all travel-related expenditures paid with federal grant funds. The Grant Coordinator review shall consist of the following:

- 1) All original, detailed receipts include an itemized list of what was purchased
- 2) The traveler has documented a valid reason for the travel which is consistent with the grant guidelines and purpose
- 3) The travel expenditures meet the allowable federal and state cost principles.
- 4) The travel is not for the State Director, Superintendent or other non-authorized individual (non-employee such as family member, School Board, etc.).
- 5) The travel is for students as a group during an educational field trip or other approved activity in accordance with grant guidelines and purpose
- 6) The travel is not for a contractor or consultant for their professional development
- 7) The travel was approved by the granting agency, as appropriate

Grant Tracking and Financial Reporting - Grant expenditures will be separately identified from operating fund expenditures through the use of designated general ledger subaccounts. Each subaccount represents a separate, segregated fund for the recording of all applicable revenues and expenditures for each fund.

Drawdown of Grant Funds: The Grant Coordinator working closely with the BMs shall on at least a quarterly basis, or as allowed or required by the State or District guidelines, drawdown grant funds that have been expensed in accordance with the State or District grant guidelines. The drawdown shall be for all expenditures to date, less grant funds received to date, as verified using a grant financial management ledger. The expenditures shall be net of all refunds, rebates, discounts, credits, and other adjustments, if

any. If the school has opted to operate under the cash reimbursement program guidelines, the school shall submit a drawdown of federal grant funds only when an expenditure has been made as evidenced by distribution of a paycheck to a grant funded staff member or mailing, e-paying, or delivering a payment to a vendor. At no time shall the Grant Coordinator or SOA drawdown any "advanced" cash payments, unless specifically allowed by the granting agency. The drawdown of grant funds from the granting agency shall be initiated by the Grant Coordinator or SOA. A detailed summary grant financial management ledger of each grant fund should be generated to determine if the school is entitled to drawdown funds, i.e. if the granting agency owes the school any funds. If the school has funds available for draw-down, a detailed general grant financial management ledger should be generated initiated by the SOA and validated by the Grant Coordinator for review and approval. If a grant has a matching requirement, the school shall draw-down only the allowable amount after verifying compliance with the level of matching expenditures. The Grant Coordinator review shall consist of the following:

- A review of the detailed grant financial management ledger for any unusual charges or reclassification of expenditures.
- A test sampling of either unusual or large expenditures to ensure that the expenditures are allowable and were reviewed and approved by all designated staff within the approved grant period of performance.
- Monitor the percentage of expenditures-or utilization rate to-date to ensure that the grant funds are expensed on a timely basis throughout the grant period. The Grant Coordinator may disallow grant fund expenditures that appear to be made outside of the grant period of performance or so late in the grant period that the school and its student did not benefit from the delayed expenditure.
- Authorize, in writing, the SOA to drawdown the available grant funds. Upon approval from the Grants Coordinator and the SOA shall prepare the paper or electronic drawdown request. The amount of the receivable shall be recorded on the grant financial management ledger and a copy of all supporting documentation such as the detailed grant financial management ledger and other supporting documentation shall be filed for audit purposes. The Directors of Finance and Accounting shall review the drawdown documentation and the grant financial management ledger and shall compare the documentation to the receipts from the State/District. Following this review, the Directors of Finance and Accounting will post the grant receipts to the general ledger.
- Ensuring that all necessary documentation is included in the drawdown packet:
 - Salary Reimbursement Worksheet, if applicable
 - Paystubs, if applicable
 - MRF
 - POs
 - Vendor Invoice
 - Copy of Check

The Grant Coordinator and BMs shall be responsible to ensure that the requested drawdown amounts do not exceed a grant-specific budgeted line item. The final draw-down of grant funds from the granting agency shall be made within the allowable or specified timeframe. The grant liquidation guidelines shall be adhered to in making final payment for all goods and services received and placed into service before the end of the grant period. The draw down process shall be the same as a monthly or periodic draw down, except that all refunds, rebates, credits, discounts or other adjustments to the grant financial management ledger must be recorded prior to submitting the final draw down request. There shall be no

outstanding purchase orders or pending liquidations at the time of the final drawdown of grant funds. The final draw-down shall be reviewed and approved in the same manner as a periodic drawdown.

Federal regulations (2 CFR §200.415) requires that the school certify the accuracy of the annual and fiscal reports or vouchers requesting payments be signed by the authorized individual(s). The Grant Coordinator, School Principal, and State Director shall jointly certify every draw-down of funds, including the final expenditure report. If a manual entry is required, the following statement will be added following signatures:

“By signing this report, we certify to the best of our knowledge and belief that the reports are true, complete and accurate, and the expenditures, disbursements and cash receipts are for the purposes and objectives set forth in the terms and conditions of the federal award. We are aware that any false, fictitious, or fraudulent information or omission of any material fact, may subject us to criminal, civil, or administrative penalties for fraud, false statements or false claims.”

If a final draw-down deadline is missed, the Grant Coordinator shall contact the granting agency to determine if a process exists to request a filing deadline extension. The receivable from the granting agency shall be recorded in the accounting general ledger. The same process for preparation and posting of the general ledger entry as a periodic drawdown shall be adhered to. The revenues realized and the expenditures should be equal at the time of the final drawdown of grant funds.

Receipt of Grant Funds - All CSUSA staff, especially those assigned with federal grant duties, shall adhere to the Cash Management Procedures. Specifically, all cash received shall be deposited, recorded reconciled by multiple individuals to ensure segregation of duties. The Director of Accounting and Finance shall record all grant fund receivables upon receipt from the granting agency. The receipt of grant funds shall be posted to the general ledger to the appropriate receivable account code. In the event that the grant funds received do not match the recorded receivable, the Director of Finance shall coordinate with the Grant Coordinator who in turn shall resolve the discrepancy or contact the granting agency to determine the discrepancy. If the granting agency has reduced and/or increased the grant funds paid to the school, a general ledger adjustment shall be posted to the appropriate revenue and receivable accounts. The Director of Accounting and Finance shall prepare the adjusting journal ledger entry and shall post the entry to the finance general ledger. The school will not maintain grant funds in a separate bank account.

Tracking and Recording Receivables - On at least a monthly basis, the finance department, Accounting Coordinator, shall review all pending receivables. Aged receivables, defined as greater than 60 days from the date of recording, shall be investigated and resolved by contacting the Grants Coordinator who in-turn will contact the granting agency. At the end of the fiscal year, all known and measurable receivables shall be recorded to the general ledger to the appropriate grant code. The Director of Accounting shall prepare the journal ledger entry and shall post the entry to the general ledger.

Grant Compliance Areas: The Grant Coordinator shall ensure that schools are compliant with all provisions and assurances of all grant programs. In addition, the all shall comply with grant requirements such as supplement not supplant, indirect cost, and maintenance of effort spending levels.

Supplement Not Supplant - The term supplement, not supplant is a provision common to many federal statutes authorizing education grant programs. There is no single supplement, not supplant provision. Rather, the wording of the provision varies depending on the statute that contains it. Although the definition may change from statute to statute, supplement not supplant provisions basically require that

grantees use state or local funds for all services required by state law, state DOE/ DPI rules, or local policies and prohibit those funds from being diverted for other purposes when federal funds are available. Federal funds must supplement—add to, enhance, expand, increase, extend—the programs and services offered with state and local funds. Federal funds are not permitted to be used to supplant—take the place of, replace—the state and local funds used to offer those programs and services. The school process to ensure that all grant funded activities are supplemental shall be a collaborative effort between the Grants Coordinator, State Director, School Principal, SOA and other appropriate departments. All person shall be aware of the supplement not supplant provisions.

The Grants Coordinator shall review and approve all purchase orders (and non-purchase order payments). The Grant Coordinator review shall include a determination if the planned purchase and/or expenditure meet one of the following guidelines:

- The grant funds will be used to enhance, expand, or extend required activities. Examples may include before/after tutoring, additional research-based instructional programs, or other supplemental expenditures not required by state law or local policy.
- The grant funds will be used for specific grant activities included the grant application that are above and beyond the activities funded with local funds
- The grant funds will be used to supplemental grant activities as noted on the school-wide plan, school strategic plan or school improvement plan.

Program specific supplement not supplant provisions shall be complied with in addition to the overall federal fund’s requirements.

Maintenance of Effort The Grant Coordinator shall ensure that schools comply with the Every Student Succeeds Act (ESSA) and Individuals with Disabilities Act (IDEA) maintenance of effort requirements.

IDEA Part-B MOE - An school that accepts IDEA-Part B funds is required under IDEA-Part B to expend, for services to students with disabilities, at least an amount equal to 100% of the state and/or local funds it expended on students with disabilities during the previous year. Federal law provides four methods of demonstrating compliance (or “maintenance of effort”), as described in each State’s education department website describing IDEA methods of determining compliance.

The Grant Coordinator working collectively with the School Principal, SOA and the Accounting and Finance Departments shall compute the MOE using the specific State IDEA Part B MOE calculation guidance, the approved budget and the prior end of school year financial criteria. Non-compliance with IDEA Part-B MOE will result in a reduction of IDEA Part-B funds in the exact proportion by which the school fails to meet the MOE requirement. If the IDEA Part-B MOE falls below the required level, the State Director, School Principal, Grant Coordinator and the Directors of the Accounting and Finance Departments shall collaborate to develop a plan to bring the school/school into compliance with the MOE requirements.

The Accounting and Finance departments shall code all special education expenditures that qualify as exceptions to a specific sub-object for tracking purposes. For example, if the school makes a long-term purchase of equipment for a special education student, the school should track that expense separately to apply that cost as an exception during the MOE calculation. Other exceptions may also apply. Refer to the State guidelines for these exceptions.

As part of the IDEA Part-B grant application process, the Grant Coordinator will need to know the prior year Special Education expenditures and the next fiscal year budgeted Special Education Expenditures. The Directors of Accounting and Finance shall provide these amounts to the Grants Coordinator to ensure that

the most accurate amounts are reflected in the grant application. Changes to these amounts, as they are known, by the accounting and finance departments shall be submitted to the Grant Coordinator, as appropriate.

Reporting Requirements - The Grant Coordinator shall ensure that all reporting requirements for grant programs are met within the established timelines. Completion of the reports may require the collaboration of several departments; such as noted below:

- Programmatic reports such as activity, progress and evaluations – Grants Coordinator, School Principal, SOA
- Expenditure reports such as interim, draw down and final expenditure reports – Grants Coordinator, School Principal, SOA, Accounting and Finance departments, and Accounts Payable Department
- Compliance reports such as Comparability, Maintenance of Effort, Indirect Cost, etc. – Grants Coordinator, School Principal, SOA, Accounting and Finance departments
- Special Staff reports – Grants Coordinator, School Principal, SOA

The Grant Coordinator shall ensure that all reporting requirements have been completed by the appropriate school, school, or CSUSA staff member.

Grant Monitoring and Accountability - The school shall ensure that all grant funds are consistently monitored throughout the grant period. The monitoring shall include, but not be limited to:

- Compliance with federal requirements such as cost principles, audit, reporting requirements, etc.
- Monitoring of grant expenditures are properly documented and meet all allowable costs
- Monitor grant performance such as internal controls, audit findings, over/under expenditures, etc.
- Implement strategies to deter, mitigate and eliminate waste and fraud in the expenditure of grant funds

The Grant Coordinators for each federal, state and local grant, working with the State Directors, school Principals and the Accounting and Finance Departments, shall be responsible for the programmatic and evaluation and financial compliance.

The Grant Coordinators shall monitor the timing of grant activities throughout the grant period, especially as they relate to the desired outcomes. The Grant Coordinators, school Principals, BMs collectively shall monitor the timing of grant expenditures, especially as they relate to the period of availability of grant funds. If either the grant activities or grant expenditures reflect that the school will not accomplish the grant activities during the grant period, the Grant Coordinators shall work collaboratively with the appropriate activities to develop an action plan to ensure that the federal grant goals are met. The oversight of grant activities and expenditures shall include, but not be limited to, the following:

- Cost overruns or high unit costs
- Construction projects – certification of project completeness (as evidenced and approved by the oversight activity)
- Significant developments that may result in an inability to complete the grant activities

The Grant Coordinator with the school shall maintain documentation to support all grant expenditures and provide the documentation upon request to the school's external auditors, granting agency or other oversight agency, as appropriate.

Audit findings or deficiencies shall be addressed in a timely manner upon receipt of the notification. The Grant Coordinator, State Director, School Principal shall work collaboratively to develop and implement a Corrective Action Plan to resolve the findings or deficiencies. The State Director, Superintendent, or designee shall approve the Corrective Action Plan and monitor the timely implementation of corrective strategies.

The Grant Coordinator in coordination with the school shall disclose to the granting agency if any federal grant funds have been subject to fraud or theft. Corrective actions, as appropriate, shall be implemented to remedy the loss of grant funds due to fraud or theft.

Remedies for Non-Compliance - Schools may be subject to consequences due to non-compliance with federal regulations. All Grant Coordinators, schools shall strive to maintain compliance, but shall respond appropriately to all notifications of noncompliance from the federal or state granting agency or pass through agency.

Grant Closeout Procedures - The Grant Coordinators shall submit all grant closeout documents to the State DOE/DPI, granting agency or pass-through agency, as appropriate. Grant closeout procedures shall include, but not be limited to:

- Ensure that no obligations are made after the grant period end date
- Liquidate all obligations incurred during the grant period
- Submit the final grant program performance report as required
- Submit the final grant expenditure report as required
- Drawdown all the expensed grant funds
- Match the grant expenditure draw-downs with the supporting financial records
- Certify that the final drawdown of federal grant funds is accurate
- Refund any excess grant funds, interest, or other payables to the granting agency or passthrough agency
- Account for any real and/or personal property on hand at the end of the grant period

Grant Funded Equipment Property Records - CSUSA Schools will maintain property records for all grant funded and operational funded equipment and computing devices/ technological items that include **§200.313(d)(1)**:

- Description of the property
- Serial number or other identification number
- Source of funding for the property (grant type)
- Grant tag number
- Title Holder of Equipment
- Acquisition date
- Cost of the property
- Percentage of Federal participation in the project costs for the Federal award under which the property was acquired
- Location of equipment
- Use of the property
- Condition of the property
- Disposition data including the date of disposal and sale price of the property.

The SOA, the School Principal, the Information Technology (IT) Technician and the Grant Coordinator will maintain a combined property record which includes all information listed above. The information,

including entering property into the fixed asset inventory (\$500 and above) and making adjustment to the inventory, is accomplished by the SOA, the School Principal, the IT Technician and the Grant Coordinator.

When inventory is received, it is inspected by the SOA, the School Principal, the IT Technician and the Grant Coordinator who determines that the inventory is in good condition and that it matches the purchase order, which matches the invoice. The equipment shall immediately be placed in a secured area. Inventory of all equipment must be completed within two working days following the receipt of the equipment. The SOA, the School Principal, the IT Technician and the Grant Coordinator logs the inventory into the property management system. The inventory control sheet is kept with the SOA, the School Principal, the IT Technician and the Grant Coordinator.

All inventoried equipment including computing devices and other highly desirable mobile devices such as laptops, smart phones, and tablets are to be tagged and tracked. The SOA, the School Principal, the IT Technician and the Grant Coordinator will be responsible for ensuring equipment is tagged.

Physical Inventory - A physical inventory of the property is taken, and the results reconciled with the property records at least annually. The SOA, the School Principal, the IT Technician and the Grant Coordinator assigns the physical inventory to teachers in the classrooms where the equipment is located. The inventory will be performed at the end of every school year and signed off by the Superintendent, State Director or designee when completed. The results of the inventory will be reported to the SOA, the School Principal, the IT Technician and the Grant Coordinator.

The SOA, the School Principal, the IT Technician and the Grant Coordinator reconciles discrepancies between the inventory and the property records by updating the property records as needed and documenting any property that is damaged or missing for identification, repair or replacement as needed. They will maintain documentation of the physical inventory and reconciliation and sign off when the reconciliation is completed.

Safeguarding Property Equipment - The SOA, the School Principal, the IT Technician and the Grant Coordinator will set up and manage a control system to insure adequate safeguards to prevent loss, damage, or theft of the property. Any loss, damage, or theft will be investigated. **§200.313(d)(3)**.

Property may be taken off campus by students or staff. The person taking the property off site must coordinate with the School Principal and the SOA and sign and date a receipt statement upon departure and return. The computing devices are tagged with the appropriate CSUSA identification and grant tag. Equipment that is lost or stolen is reported to the SOA, the School Principal, the IT Technician and the Grant Coordinator. They are then required to report it to the SOA, the School Principal, the IT Technician and the Grant Coordinator, where they or their designee will complete an investigation on the lost or stolen property. Interviews will be conducted, and/or a police report will be filed under the discretion of the State Director, Superintendent or designee and coordinated with the School Principal, and the Grant Coordinator, as part of the investigation process. A report regarding lost or stolen property will be completed by the person doing the investigation. The report will be filed with the property inventory records as well as with the grant records. In addition to possible criminal action the State Director, Superintendent or designee will determine what, if any, additional action is necessary. Replacement of equipment will be obtained through the normal procurement functions, meet or exceed equipment specifications of the lost/stolen items. Replacement costs will be incurred through non-grant school funding.

Disposition of property will be listed by the SOA, the School Principal, the IT Technician and the Grant Coordinator in the property records in the event the property is sold, lost or stolen, or cannot be repaired.

Property that is sold, identified as lost or stolen, or cannot be repaired will be listed in the property records for three (3) years after the lost/stolen date.

Maintaining Property Equipment - Staff to whom property equipment is assigned will monitor and maintain these items in good condition while in their possession.

The SOA, the School Principal, the IT Technician and the Grant Coordinator should be contacted if an item is broken or not working properly. Equipment in need of repair is assessed by the SOA, the School Principal, the IT Technician and the Grant Coordinator to determine whether to repair or salvage. As part of this process the SOA, the School Principal, the IT Technician and the Grant Coordinator will determine if a warranty will apply to the repair, if not, they will obtain repair cost estimates. Generally, if the cost of repair exceeds half the cost of the restored value, then the equipment may be salvaged or donated. Other factors such as availability of the damaged item can be considered when determining whether a repair is appropriate.

Disposition of Grant Funded Equipment - §200.313(e) - When original or replacement equipment acquired under a Federal award is no longer needed for the original project or program or for other activities currently or previously supported by a Federal awarding agency, except as otherwise provided in Federal statutes, regulations, or Federal awarding agency disposition instructions, CSUSA Schools will dispose of the equipment as follows:

- Items of equipment with a current per unit fair market value of \$5,000 or less may be retained, sold or otherwise disposed of with no further obligation to the Federal awarding agency **§200.313(e)(1)**.
- Items of equipment with a current per-unit fair-market value in excess of \$5,000 may be retained by CSUSA Schools or sold **§200.313(e)(2)**.
- The Federal awarding agency is entitled to an amount calculated by multiplying the current market value or proceeds from sale by the Federal awarding agency's percentage of participation in the cost of the original purchase.
- If the equipment is sold, the Federal awarding agency may permit CSUSA Schools to deduct and retain from the Federal share \$500 or ten percent of the proceeds, whichever is less, for its selling and handling expenses.

The SOA, the School Principal, the IT Technician and the Grant Coordinator with approval from the State Director, Superintendent or designee, are responsible for determining how equipment will be disposed of. Possible sales procedures include on-site and govdeals.com auction. Auctions will be advertised online or in the local newspaper to ensure the highest level of exposure. If not being sold by auction the sale of the item will also be advertised online or in the local newspaper to ensure the highest level of exposure and there is no limit to the number of purchase offers that will be considered. The highest offer received in a reasonable amount of time will be accepted. All sales procedures will be performed in a manner to ensure the highest possible return **§200.313(d)(5)**.

CSUSA Schools will determine if the various state departments of instruction or education have specific equipment disposition forms required. If so, our schools will utilize these forms and ensure that are completed by the SOA, the School Principal, the IT Technician and the Grant Coordinator and kept on file with the SOA.

Acronyms and Definitions

Catalog of Federal Domestic Assistance (CFDA), is an E-Gov initiative managed by the General Services Administration (GSA), is a list of all federal financial assistance and nonfinancial assistance programs available

to a variety of applicants. The CFDA, now called Assistance Listings on beta.SAM.gov, helps users find general information about the assistance, identify program objectives, eligibility requirements, and links to current opportunities on Grants.gov related to a particular assistance listing. CFDA numbers are the system for identifying and sorting the 2,000+ federal programs. Each CFDA number contains five digits and appears in the following format: ##.### (e.g., 10.001 or 98.102).

Capital assets means tangible or intangible assets used in operations having a useful life of more than one year which are capitalized in accordance with GAAP. Capital assets include:

- (a) Land, buildings (facilities), equipment, and intellectual property (including software) whether acquired by purchase, construction, manufacture, lease-purchase, exchange, or through capital leases; and
- (b) Additions, improvements, modifications, replacements, rearrangements, reinstallations, renovations or alterations to capital assets that materially increase their value or useful life (not ordinary repairs and maintenance).

Code of Federal Regulations (CFR) is the codification of the general and permanent rules and regulations (sometimes called administrative law) published in the Federal Register by the executive departments and agencies of the federal government of the United States. The CFR is divided into 50 titles that represent broad areas subject to federal regulation.

Computing devices means machines used to acquire, store, analyze, process, and publish data and other information electronically, including accessories (or “peripherals”) for printing, transmitting and receiving, or storing electronic information

Cost sharing or matching means the portion of project costs not paid by Federal funds (unless otherwise authorized by Federal statute). See also §200.306 Cost sharing or matching.

Encumber is an accounting ledger entry which represents a planned or obligated expenditure setting aside the required monies to fund the expense

Education Department General Administrative Regulations (EDGAR) is the guidance adopted by the US Department of Education for the administration of all educational grants.

Equipment means tangible personal property (including information technology systems) having a useful life of more than one year and a per-unit acquisition cost which equals or exceeds the lesser of the capitalization level established by the non-Federal entity for financial statement purposes, or \$5,000.

E-Verify is a web-based system that allows enrolled employers to confirm the eligibility of their employees to work in the United States. E-Verify employers verify the identity and employment eligibility of newly hired employees by electronically matching information provided by employees on the Form I-9, Employment Eligibility Verification, against records available to the Social Security Administration (SSA) and the Department of Homeland Security (DHS).

Expenditures means charges made by a non-Federal entity to a project or program for which a Federal award was received.

Fixed Price means a type of grant agreement under which the Federal awarding agency or pass-through entity provides a specific level of support without regard to actual costs incurred under the Federal award. This type of Federal award reduces some of the administrative burden and record-keeping requirements for both the non-Federal entity and Federal awarding agency or pass-through entity. Accountability is based primarily on performance and results. See §§200.201 Use of grant agreements (including fixed amount awards), cooperative agreements, and contracts, paragraph (b) and 200.332 Fixed amount subawards.

Fair Labor Standards Act (FLSA) establishes minimum wage, overtime pay, recordkeeping, and youth employment standards affecting employees in the private sector and in Federal, State, and local governments.

Fiscal Year (FY) is the accounting period for funds established by federal, state, local or private entity.

Federal Fiscal Year (FFY) is the accounting period established for designated federal grant funds.

GAAP has the meaning specified in accounting standards issued by the Government Accounting Standards Board (GASB) and the Financial Accounting Standards Board (FASB).

GAGAS, also known as the Yellow Book, means generally accepted government auditing standards issued by the Comptroller General of the United States, which are applicable to financial audits.

General purpose equipment means equipment which is not limited to research, medical, scientific or other technical activities. Examples include office equipment and furnishings, modular offices, telephone networks, information technology equipment and systems, air conditioning equipment, reproduction and printing equipment, and motor vehicles. *Fixed amount awards or Firm*

Grant agreement means a legal instrument of financial assistance between a Federal awarding agency or pass-through entity and a non-Federal entity that, consistent with 31 U.S.C. 6302, 6304:

Indirect (F&A) costs means those costs incurred for a common or joint purpose benefitting more than one cost objective, and not readily assignable to the cost objectives specifically benefitted, without effort disproportionate to the results achieved. To facilitate equitable distribution of indirect expenses to the cost objectives served, it may be necessary to establish a number of pools of indirect (F&A) costs. Indirect (F&A) cost pools must be distributed to benefitted cost objectives on bases that will produce an equitable result in consideration of relative benefits derived.

Information technology systems means computing devices, ancillary equipment, software, firmware, and similar procedures, services (including support services), and related resources.

Internal controls means a process, implemented by a non-Federal entity, designed to provide reasonable assurance regarding the achievement of objectives in the following categories:

- (a) Effectiveness and efficiency of operations;
- (b) Reliability of reporting for internal and external use; and
- (c) Compliance with applicable laws and regulations.

Liquidate means funds have been issued, recorded as an expenditure and removed from the budget, or obligations have been spent.

Local educational agency (school) is a public board of education or other public authority legally constituted within a State for either administrative control or direction of, or to perform a service function for, public elementary schools or secondary schools in a city, county, township, school district, or other political subdivision of a State, or for a combination of school districts or counties that is recognized in a State as an administrative agency for its public elementary schools or secondary schools.

Micro-purchase means a purchase of supplies or services using simplified acquisition procedures, the aggregate amount of which does not exceed the micro-purchase threshold. Micro-purchase procedures comprise a subset of a non-Federal entity's small purchase procedures.

North American Industry Classification System (NAICS) is the standard used by Federal statistical agencies in classifying business establishments for the purpose of collecting, analyzing, and publishing statistical data related to the U.S. business economy.

Notice of grant award (NOGA) is a legal document given to the intended organization that indicates an award has been made and that funds may be requested from the designated payment system or office.

Obligate is an accounting ledger entry which represents a planned or obligated expenditure setting aside the required monies to fund the expense. In terms of federal grants, the term "Obligate" is synonymous with "Encumber"

Obligations is used in connection with a non-Federal entity's utilization of funds under a Federal award, *obligations* means orders placed for property and services, contracts and subawards made, and similar transactions during a given period that require payment by the non-Federal entity during the same or a future period.

OMB means the Executive Office of the President, Office of Management and Budget.

Pass-through entity means a non-Federal entity that provides a subaward to a subrecipient to carry out part of a Federal program.

Period of Allowability is the time period in which physical items may be purchased and events may occur as expenses within a federal grant. The allowability period does NOT include the extended time in which encumbrances can be liquidated.

Period of performance (PoP) means the time during which the non-Federal entity may incur new obligations to carry out the work authorized under the Federal award. The Federal awarding agency or pass-through entity must include start and end dates of the period of performance in the Federal award (see §200.210 Information contained in a Federal award paragraph (a)(5) and §200.331 Requirements for pass-through entities, paragraph (a)(1)(iv)).

Protected Personal Identifiable Information (PII) means an individual's first name or first initial and last name in combination with any one or more of types of information, including, but not limited to, social security number, passport number, credit card numbers, clearances, bank numbers, biometrics, date and place of birth, mother's maiden name, criminal, medical and financial records, educational transcripts. This does not include PII that is required by law to be disclosed.

School Year (SY) refers to a specific School year; for example, SY17-18.

Simplified acquisition threshold means the dollar amount below which a non-Federal entity may purchase property or services using small purchase methods. Non-Federal entities adopt small purchase procedures in order to expedite the purchase of items costing less than the simplified acquisition threshold. The simplified acquisition threshold is set by the Federal Acquisition Regulation at 48 CFR Subpart 2.1 (Definitions) and in accordance with 41 U.S.C. 1908. As of the publication of this part, the simplified acquisition threshold is \$150,000, but this threshold is periodically adjusted for inflation.

Special purpose equipment means equipment which is used only for research, medical, scientific, or other technical activities. Examples of special purpose equipment include microscopes, x-ray machines, surgical instruments, and spectrometers.

State means any state of the United States, the District of Columbia, the Commonwealth of Puerto Rico, U.S. Virgin Islands, Guam, American Samoa, the Commonwealth of the Northern Mariana Islands, and any agency or instrumentality thereof exclusive of local governments.

State Education Agencies (SEA) means the state-level government organization within each U.S. state or territory responsible for education, including providing information, resources, and technical assistance on educational matters to schools and residents.

Supplies means all tangible personal property other than those described in §200.33 Equipment. A computing device is a supply if the acquisition cost is less than the lesser of the capitalization level established by the non-Federal entity for financial statement purposes or \$5,000, regardless of the length of its useful life.

FORMS

FORMS

Title 1 Checklist
Parents' Right to Know Letter
Semi-Annual Certification
Time and Effort Log
Inventory Sheet

Title 1 Checklist

- _____ Award Letter
- _____ School Improvement Plan
- _____ Annual Title 1 Meeting (Agenda, Sign-in Sheet, Notification)
- _____ School/Parent/Student Compact
- _____ Complaint Procedure
- _____ Parents' Right-to-Know Letter (Including evidence of distribution)
- _____ Parent Involvement Plan/Policy and Feedback
- _____ Semi-Annual Certification/Time and Effort
- _____ Ranking Ordering Spreadsheet and Procedures (If applicable)
- _____ Technology Inventory (Title 1 funded technology)
- _____ Job Descriptions of Title 1 funded positions
- _____ Materials Request Forms, Purchase Orders, Invoices, and Check copies for purchases
- _____ Draw-down documentation
- _____ All audit information (Documents submitted and reports from DOE)
- _____ Copies and/or screen shots of submitted reports

PARENTS' RIGHT-TO KNOW

Sample Parent Notification Letter

Date (Beginning of School Year)

Dear Parents and Guardians:

In accordance with the Elementary and Secondary Education Act, Section 111 I(h)(6) PARENTS' RIGHT TO KNOW, this is a notification from _____ school to every parent of a student in a Title I school that you have the right to request and receive information in a timely manner regarding the professional qualifications of your student's classroom teachers. This information regarding the professional qualifications of your student's classroom teachers shall include the following:

- If the teacher has met state qualification and licensing criteria for the grade level and subject areas taught;
- If the teacher is teaching under emergency or temporary status in which the state qualifications and licensing criteria are waived;
- The teachers' baccalaureate degree major, graduate certification, and field of discipline; and
- Whether the student is provided services by paraprofessionals, and if so, their qualifications

If you have questions or concerns, please feel free to contact the school principal at _____.

Sincerely,

School Superintendent/School Principal

Semi-Annual Certification
Activity Report for Employees Working on a Single Cost Objective

All employees whose full salary is covered under one grant must sign this form twice per school year (December and May).

Employee: _____

Employee Title: _____

School Name: _____

Reporting Period: _____

School Year: _____

Employee Signature: _____

I certify that I have firsthand knowledge that the above employee performed work on activities authorized by the federal grant program and for the time shown.

Principal Signature

Date

Printed Name

TIME AND EFFORT LOG

Employee Printed Name _____ Supervisor's Name _____ Month _____
 Position Title _____ Supervisor's Signature _____ Year _____
 Signature _____

Direct Time	Day of the Month Worked																															TOTAL HOURS	
Program Name	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24	25	26	27	28	29	30	31	0	
General Funds (Regular Pay)																																	0
Title I																																	0
Title II																																	0
Special Education																																	0
CARES																																	0
CARES 2.0																																	0
CARES 3.0																																	0
SUBTOTAL	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Indirect Time	Day of the Month Worked																															TOTAL HOURS	
Purpose	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24	25	26	27	28	29	30	31	0	
PTO																																	0
Holiday																																	0
Professional Development																																	0
Other																																	0
SUBTOTAL	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
GRAND TOTALS	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0

*** NOTE: The days worked are to be logged in daily.
 **NOTE: Minimum Hours to be Logged is .25 (1/4 of an hour)

IT Inventory Sheet

Cart #	Item Name	Serial/Item Number	Vendor	Date of Purchase	Purchase Price	Grant	Location of Property	Use and condition of Property

North Carolina Addendum

As provided in 48 CFR § 9905.502-30 – Definitions, a cost objective is a function, organizational subdivision, contract, or other work unit for which cost data are desired and for which provision is made to accumulate and measure the cost of processes, products, jobs, capitalized projects, etc. There are two type of cost objectives, single cost objective and multiple cost objective.

Single Cost Objectives: It is possible for an employee to work on a single cost objective even if the employee works on more than one Federal award or on a Federal award and a non-Federal award. The key to determining whether it is a single cost objective is whether the employee’s salary and wages can be supported in full from each of funding sources indicated. If an employee is working on a single cost objective, even if split funded, a semi-annual certification may be filled out.

Examples of Single Cost Objectives:

- A math teacher is split 50% Title I funds and 50% Operational funds
- An elementary teacher who is paid through the Operational fund and is also paid with Title I to provide after- school tutoring for low-achieving students Although this teacher could not be paid with Title I funds to provide elementary education, the portion of time spent on after school tutoring is clearly separated from their teaching position by their schedule

Multiple Cost Objectives: If an employee’s salary and wages cannot be supported under a single cost objective are paid under multiple funds, each of the cost objectives must be identified on the PAR and a percentage of the cost must be identified by cost objective.

Semi-Annual Certifications – Salaries and wages paid for employees who work on a single Federal cost objective must be supported by periodic certifications that the employees worked solely on that program for the period covered by the certification. These certifications must be prepared at least semi-annually and signed by the employee or supervisory official who has first-hand knowledge of the employee’s work. The Semi-Annual Certifications are required for the periods as shown below.

Semi-Annual Certification Periods	Date Form must be completed and signed by Staff	Date Form must be reviewed, validated and signed by Supervisor/Principal
January 1 st through June 30 th	June 30 th at the end of the working day	July 15th
July 1 st through December 31 st	December 31 st at the end of the working day	January 15th

The staff funded under a single cost objective shall complete a Semi-Annual Certification form. This form is required at least semi-annually and certifies that they worked solely on the program for the period covered by the certification. The employee and School Principal must sign the Semi-Annual Certification Form. The timeline for semi-annual certifications shall be once per academic semester to coincide with teaching assignment each semester. The Grant Coordinator shall maintain all signed semi-annual certifications with the appropriate grant files for audit purposes.

The Grant Coordinator, School Principal and SOA shall review all forms to ensure that every staff member has certified that their schedule is 100% grant related and to verify the working schedule is 100% grant related. Any certifications that reflect a percentage other than 100% shall be forwarded to the School Principal and SOA for adjustment of the grant payroll expenditures for the certification period. Steps should also be taken to ensure that the staff member's work schedule is adjusted to 100% grant related or is changed from the semi-annual certification method to Personnel Activity Report reporting.

Personnel Activity Report Documentation - All staff funded wholly or partially with federal grant funds shall comply with federal guidelines related to time and effort or personnel activity. The grant funded staff, School Principals, State Directors, SOAs, and Grant Coordinators shall be aware of the federal guidelines related to personnel activity report documentation. On a least an annual basis, all impacted staff shall be trained by the Grant Coordinator or SOA on how to complete the required forms. The Grant Coordinator and SOA shall collect and monitor Personnel Activity Report documentation for LEA employees only. Personnel Activity Report documentation does not apply to Independent Contractors. The LEA shall comply with all federal Personnel Activity Report documentation guidelines.

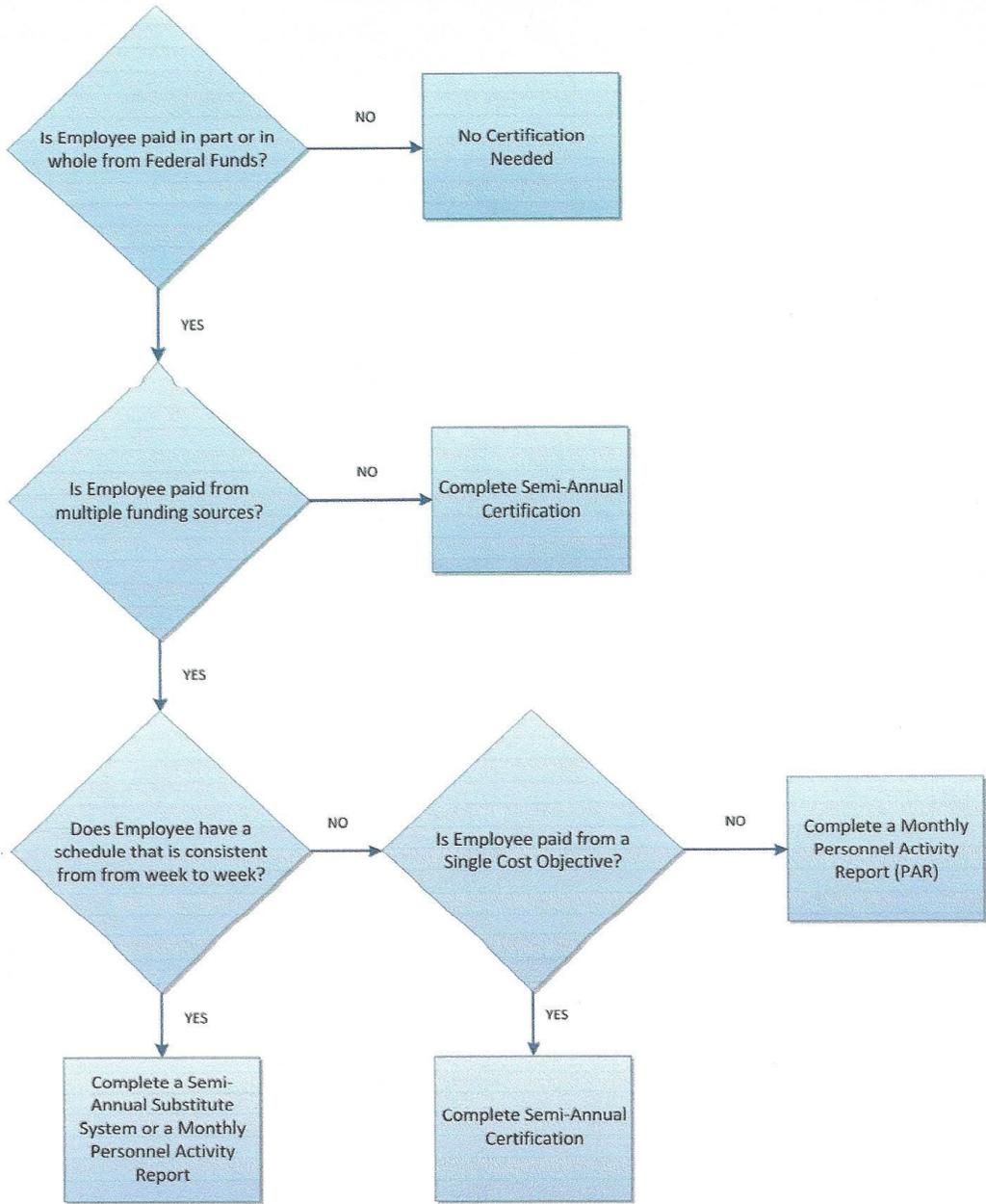
Personnel Activity Report requirements staff split funded (funded from more than one (1) cost objective and/or grant programs) - Personnel Activity Report requirements apply to employees who do one or more of the following:

- Do not work 100% of their time in a single grant program.
- Work under multiple grant programs.
- Work under multiple cost objectives.

These employees are required to maintain a Personnel Activity Report Worksheet or account for their time. Employees must prepare Personnel Activity Reports monthly to coincide with the LEA pay periods. Such reports must reflect an after-the-fact distribution of 100 percent of the actual time spent on each activity and must be signed by the employee and the School Principal. Charges to payroll must be adjusted to coincide with preparation and submittal of the interim expenditure report required for discretionary grants.

- The employee shall submit all signed Personnel Activity reports to the SOA on a monthly basis who will forward copies to the Grant Coordinator. The Grant Coordinator review shall consist of the following:
 - A review of the Personnel Activity Reports to compare the summary percentage of grant related work per funding source to the budgeted percentage utilized to charge the monthly (or semi-monthly) payroll charges
 - A test sampling of staff assignments, i.e. master schedule, duty schedule, etc. to verify the percentage of grant-related work per funding source
 - If the Personnel Activity Report reflects the same percentage, the report may be filed for audit purposes

If the Personnel Activity Report reflects a different percentage, the report shall be reconciled to reflect the correct payroll charges by grant funding source and forward the reconciliation to the SOA for adjustment of the payroll charges.



Out of Field Report

Charter School Name	Four Corners Charter School	District Board Meeting Date	Board meeting: Aug. 9, 2022
Teacher	Out-of-Field Assignment	Current Certification(s)	Out of Field Assignment Date
Ausua, Carol	ESOL, Reading	Elementary Education (k-6)	8/10/2017
Brown, Terria	ESOL, Reading	KG Teacher	3/9/2020
Bucia, Brianna K.	ESOL, Reading	2nd Grade Teacher	7/26/2021
Carney, Carlecia	ESOL	4th Grade Teacher	7/26/2021
Colon, Sarahi	ESOL, Reading	3rd Grade Teacher	7/26/2021
Cordova, Jorge	Reading	PE Teacher	
Crawford, Melissa	ESOL, Reading	3rd Grade Teacher	7/26/2021
Detres, Cynthia	ESOL, Reading, Elem. Education K-6	Pre-K Education	8/10/2017
DuPont, Erica	ESOL	Prof. Cert Elem. Ed. (K-6)	7/25/2016
Gonzalez, Gloria	ESOL, Reading	Elem. Educ. K-6	
Hendrix, Amanda	ESOL, Reading	2nd Grade Teacher	8/1/2022
Luna, Martha	ESOL, Reading	Elementary Education (Grades K-6)	4/4/2016
Nickless, Annabelle	ESOL, Reading	Pre K Primary Education	8/10/2017
Nivar, Liah	ESOL, Reading, Elem. Education	Soci. Science 5-9	10/19/2020
Oaks, Cherryl M.	ESOL,	PE	8/9/2021
Panama, Lesley	ESOL, Elementary ED, Reading	Permanent Substitute	8/02/2021
Phillips, Alisha	ESOL, Reading	Elementary Education K-6	7/30/2018
Rodriguez, Melinda	ESOL, Reading	2nd Grade Teacher	7/26/2021
Ross, Desiree	ESOL	Daily Substitute	
Sanchez, Kaitlyn	ESOL, Reading	Temp. Elementary Education K-6	7/20/2019
Shelton, Steven	ESOL	Prof. Cert Elem. Ed. (K-6)	7/25/2016
Spencer, Ronald	ESOL, Elementary ED, Reading	Elem. Educ. K-6	7/26/2021
Thorell Rachelle-Ann	ESOL, Reading, Elem. Educ. K-6	Permanent Substitute	8/02/2021
Vessey, Anna	ESOL, Reading Elem. Educ. K-6	Daily Substitute	
Nazario, Zena	ESOL	Permanent Substitute	8/1/2022
Alverio, Shaniya	ESOL	Permanent Substitute	8/1/2022
Lee, Cary	Esol, Reading	5th Grade Teacher	
Faughn, Kristin	ESOL, Reading	Elementary Science Teacher	8/1/2022
Rodriguez, Evy	Reading	1st Grade Teacher	8/1/2022
Yesenia Morales	ESOL, Reading	1s Grade Teacher	8/1/2022
Marisol Quevedo	ESOL	Permanent Substitute	7/27/2022
Joyner, Deanna	ESOL, Reading	3rd Grade Teacher	7/27/2022
Guerra, Romina	ESOL	Daily Substitute	8/8/2022
Suter, Todd	ESOL	Permanent Substitute	8/8/2022
Schafer, Kenneth	ESOL	Permanent Substitute	8/5/2022
Romano, Marisol	ESOL	Permanent Substitute	8/8/2022
Cruz, Keydalise	ESOL	Permanent Substitute	8/8/2022
Ramos, Lilianette	ESOL, Reading	Permanent Substitute	8/10/2022