



FLORIDA DEPARTMENT OF EDUCATION

Office of Independent Education and Parental Choice

Public Charter School Grant Program Compliance/Monitoring Site Visits

Program authorized by CFDA #84.282A – Title V, Part B, Subpart 1 of the Elementary and Secondary Education Act of 1965, as amended by the No Child Left Behind Act of 2001

Name of School:

District:

Date of Site Visit:

Site Visit Roster:

List of names, positions, and organization name of all persons attending site visit (school, governing board, sponsor, management company, etc.)

Site Visit Leader:

Site Visit Team:

OVERVIEW

Compliance is an integral part of the Public Charter School Grant Program (PCSGP). The Florida Department of Education (FDOE) conducts onsite visits to monitor charter schools receiving PCSGP grants.

The purpose of the site visit is to determine how well the sub-grantee is meeting requirements and guidelines:

1. Program implementation (grant expenditures are aligned with the goals and objectives stated in the grant application);
2. Fiscal accountability;
3. Board Founding, Governance, Policy & Fiscal Oversight; and
4. Property Management. Program staff will notify the sub-grantee of any findings and/or need for corrective actions after the site visit has been conducted.
5. Dissemination Plan

Name of Charter School	
Charter School Contact	
Contact Phone	
Contact Email	
RFP Cycle	
Current Budget Period	
Current Award Amount	
Current Award Dates	

Documentation Checklist:

Please assemble and request any of the following materials that we do not already have:

- Documentation of all purchases (399 reports) and receipts using CSP Funds
- Board composition (Objective 1A1)
- Conflict of Interest Policy (Objective 1C)
- Adopted By-Laws, Policies & Procedures (Objective 1A2, 1A3)
- Verification of board training (Objective 1B)
- Federal Definition of charter school documentation (Objective 1D): non-profit, secular, operationally independent of other CSP-funded charter schools.
- Evaluation of School Performance (Objective 2A)
- Evidence of strong financial controls: Monthly financial reporting to the governing board and sponsor; Internal financial controls and segregation of duties (Objectives 3A1, 3A2, 3A3)
- Inventory Report: CSP-funded items by room, grade level, current disposition* (Objective 3A4)
- Procurement Policy (Objective 3A4)
- Lottery Provisions
- GEPA Plan
- Charter School conference attendance by principal/director and at least one board member (Objective 4A)
- Principal professional development plan; board evaluation of principal performance (Objective 4B).
- Policies describing procedures in compliance with IDEA (Objective 5)
- List of Educational Objectives (Section 2)
- Dissemination: Announcements, newsletters, newspaper advertisements/announcements regarding board meetings; application period; parent/community information meetings; school program informational pamphlets

Reviewer Instructions for the Site Visit Monitoring Rubric

During the site visit, the reviewer (or review team) will monitoring your school's progress towards:

- ◇ Achieving all required and school developed grant and education objectives.
- ◇ Documentation of all CSP-funded purchases and one-time expenses (Approved only for three month period prior to school opening including positions funded, lease/rent, and insurance).
- ◇ All CSP obligations/purchases must fall within the allowable award period.
- ◇ All CSP obligations/purchases are allowable.
- ◇ School meets PCSPG/NCLB definition of charter school.
- ◇ All purchases only benefit students of the charter school receiving CSP grant funds.
- ◇ Lottery provisions clearly articulate when the school will use a random selection process, No First Come First Serve allowed when the applications exceed the spaces available, and No Articulation Agreements giving preference to students from another public or charter school.
- ◇ All indicators must be fully met to be in compliance. The reviewer may request additional information during or following a site visit to gather necessary documentation. An action plan will be used when the school must demonstrate compliance with documentation of specific actions.

The reviewer will use a check or check-minus system to evaluate the quality in which each indicator was achieved. When multiple criteria are given, all must be met.

The reviewer will write specific comments in the Action Required/Comments section to clearly indicate what additional documentation, clarification, or action is necessary to ensure the school demonstrates full compliance.

Page two shows a blank version of the Charter School Site Visit Monitoring Rubric.

Pages two through fourteen include all indicators that will be using during the scheduled site visit.

Indicator:

Definition of Indicator

Documentation: List necessary documents or evidence

Criteria	Status	Action Required/Comments
Specific question, documentation or policy to be reviewed	<p>√ Met</p> <ul style="list-style-type: none"> ◇ The school has provided all necessary documentation for this criterion. ◇ School follows NCLB and other related non-regulatory guidance. ◇ Policies are in compliance with relevant guidelines in EDGAR. 	
	<p>— Not Met</p> <p>Documentation is lacking or some processes need to be refined for full compliance with this criterion. .</p>	<p>For criteria not met, the reviewer will request specific documentation or action items within a given deadline.</p> <p>If necessary, the reviewer will indicate that a Corrective Action Plan (CAP) is required and will follow-up with a written request for information, documentation and/or policies requiring additional development with specific deadlines.</p>
	<p>NA Not applicable</p> <p>The criterion is not applicable.</p>	<p>For criteria marked Not Applicable (NA), reviewer will describe the reason.</p>
Total Criteria:	<p># Met _____</p> <p># Not met _____</p> <p># N/A _____</p>	

Key: √ Met – Not met (Specify action/documentation required) **NA** Not applicable - Explain

Indicator G1: Lottery

The charter school complies with the lottery provisions contained in state and federal law.

Documentation: Lottery policy; registration announcements; application; school pamphlets

<u>Criteria</u>	<u>Status</u>	<u>Action Required/Comments</u>
1. The school has a lottery policy that clearly states a random selection process will be implemented when the school receives more applications than seats available.		
2. How does the school select/rank applicants using a random selection process?		
3. The school does <u>not</u> use a first come first serve policy after conducting an initial lottery.		
4. The school's lottery process clearly defines allowable exemptions.* Exemptions for 'sister schools' are <u>not</u> allowable while the school is receiving CSP funds.		
5. The school used a lottery process during the current school year and followed its established guidelines.		
6. As an active CSP grant recipient, the school does <u>not</u> have any articulation policies (direct acceptance of students from another traditional public or charter school).		
Total Criteria:	# Met _____ # Not met _____ # N/A _____	

Key: ✓ Met – Not met (Specify action/documentation required) **NA** Not applicable - Explain

Indicator G2: Conflict of Interest

The charter school has adopted and implemented conflict of interest policies that prevent real or apparent conflicts of interest.

Documentation: Board composition
Conflict of Interest policy and Board Minutes (if they include documentable actions)
Rent/lease agreement

Criteria	Status	Action Required/Comments
1. Governing Board has adopted and implemented a Conflict of Interest Policy that prevents real or apparent conflicts of interest. Date Policy Adopted: _____		
2. Policy Check: When a board member has identified a real or apparent conflict of interest, he/she does not participate in the review, selection, or administration processes.		
3. Board Actions: Conflict of Interest Policy requires board members to abstain from voting where a real or apparent conflict of interest exists.		
4. Board Minutes: Board minutes document when a member has a real or apparent conflict of interest and the member has abstained from voting on any related business items.		
5. The school does not enter into lease/rental contracts where any board member has a real or apparent conflict of interest. <i>(Review Lease/Rental Contract against active board member list.)</i>		
Total Criteria: 5	# Met _____ # Not met _____ # N/A _____	

Key: ✓ Met – Not met (Specify action/documentation required) **NA** Not applicable - Explain

Indicator G3: Procurement

The charter school has adopted and implemented procurement policies consistent with federal regulations.

Documentation: Procurement policy
Documentation of competitive bids.
Invoices or receipts

<u>Criteria</u>	<u>Status</u>	<u>Action Required/Comments</u>
1. School has a procurement policy that involves competitive bidding or at least three written price estimates, selection of the most advantageous bid for the school, justification for any sole-source bid.		
2. School provides documentation of price checks/bids for goods and/or services according (as identified in policies).		
3. School provides justification for any sole-source bids/purchases.		
4. Management company, when used to procure goods and services, demonstrates a) use of competitive bids or at least three price checks, and b) centralized purchasing/reselling provides best use of financial resources for charter schools with price comparisons (local purchasing vs. centralized purchasing).		
Total Criteria: 4	# Met _____ # Not met _____ # N/A _____	

Key: ✓ Met – Not met (Specify action/documentation required) **NA** Not applicable - Explain

Indicator F1: Financial records

The charter school utilizes an acceptable and appropriate system for maintaining financial records related to CSP purchases.

Documentation: Documentation of all purchases (399 reports) and receipts using CSP funds
Use Budget Narrative if 399 report has not been completed

<u>Criteria</u>	<u>Status</u>	<u>Action Required/Comments</u>
1. School has a clearly organized system for maintaining receipts/invoices for all purchases made with CSP Funds. Review most current or specific program performance period (Planning, Implementation I, or Implementation II).		
2. Clearly identifiable receipts can be matched to the approved CSP budget for any selected items.		
3. All items/services purchased with CSP funds are allowable.		
4. School stores receipts and financial records in a manner than minimizes possibility of destruction (locked, fireproof storage; regular off-site backups of electronic records).		
Total Criteria: 4	# Met _____ # Not met _____ # N/A _____	

Key: ✓ Met – Not met (Specify action/documentation required) **NA** Not applicable - Explain

Indicator F2: Fraud

The charter school segregates among staff or directors various financial duties to minimize the risk of fraud or misuse of funds.

Documentation: Evidence of strong financial controls, internal financial controls and segregation of duties

<u>Criteria</u>	<u>Status</u>	<u>Action Required/Comments</u>
1. Approved policies specify segregation of financial duties by position/person responsible.		
2. Policy requires multiple signatures for checks over a specified amount by position (amounts greater than \$750).		
3. Check writing and deposits are done by separate individuals.		
4. Access to Petty Cash guidelines and allowable uses are included in school's financial policies.		
Total Criteria: 4	# Met _____ # Not met _____ # N/A _____	

Key: ✓ Met – Not met (Specify action/documentation required) **NA** Not applicable - Explain

Indicator F3: Monthly financial statements to governing board

The charter school administration provides monthly financial reports to its governing board for review and approval.

Documentation: Examples of monthly financial reports and documentation in board minutes that they have been submitted for review/approval; documentation in minutes of financial oversight by the board.

<u>Criteria</u>	<u>Status</u>	<u>Action Required/Comments</u>
1. School generates monthly financial statements for the governing board.		
2. School submits and governing board reviews and approves monthly financial statements (documented in board minutes).		
3. Governing board reviews and approves budget and budget amendments (documented in board minutes).		
4. Governing board meeting minutes document discussions demonstrating fiduciary oversight of school (ex. Financial and procurement policy discussions, review of monthly financial statements, development/review/revisions/approval of school budget; purchases, etc.).		
Total Criteria: 4	# Met _____ # Not met _____ # N/A _____	

Key: ✓ Met – Not met (Specify action/documentation required) **NA** Not applicable - Explain

Indicator F4: Monthly financial reports to sponsor

The charter school provides monthly financial reports to its sponsor.

Documentation: Examples of monthly financial reports; documentation of submission to the sponsor

<u>Criteria</u>	<u>Status</u>	<u>Action Required/Comments</u>
1. The school has an approved policy that requires monthly reporting of financial statements to the sponsor.		
2. The charter contract requires monthly reporting of financial statements to the sponsor.		
3. The school provides examples that they have submitted monthly financial statements to the sponsor during the current school year.		
4. The monthly financial statements to the sponsor are submitted on a timely basis.		
Total Criteria: 4	# Met _____ # Not met _____ # N/A _____	

Key: ✓ Met – Not met (Specify action/documentation required) **NA** Not applicable - Explain

Indicator F5: Annual audit

The charter school complies with the same federal and state audit requirements as do other elementary and secondary schools in the state.

Documentation: Evidence of board policy, contract; copy of audit

<u>Criteria</u>	<u>Status</u>	<u>Action Required/Comments</u>
1. The school has a policy that requires an annual independent financial audit.		
2. The charter contract requires an annual independent financial audit.		
3. When was the most recent independent annual audit completed? Date completed: _____		
4. Has the school submitted a copy of the audit findings to its sponsor? Date submitted to sponsor: _____		
Total Criteria: 4	# Met _____ # Not met _____ # N/A _____	

Key: ✓ Met – Not met (Specify action/documentation required) **NA** Not applicable - Explain

Indicator F6: Inventory

The charter school has implemented an inventory control procedure that ensures items purchased with CSP funds are identified, marked, and accounted for on a regular basis.

Documentation: Inventory report, procurement policy

<u>Criteria</u>	<u>Status</u>	<u>Action Required/Comments</u>
1. Does the school have an inventory control system for high-cost items (\$500)?		
2. How often does the policy require a full inventory? Most recent inventory date _____		
3. All CSP purchases are clearly identified and included in the inventory report.		
4. Does the inventory report show item, date purchased, inventory date, condition, room number, item ID number?		
5. How does inventory system account for lost, stolen, or damaged items?		
6. Are capital outlay purchases (items or equipment purchased with CSP funds) identified with unique code, school name, district name?		
7. Do any school loans use capital outlay items purchased by CSP as collateral (<u>not allowable</u>)?		
8. Does the inventory report show the final disposition date, reason, and how CSP-funded items were removed from inventory?		

9. Does the landlord have the right to confiscate capital outlay items purchased with CSP funds (<u>not allowable</u>)?		
Total Criteria: 9	# Met _____ # Not met _____ # N/A _____	
Key: ✓ Met – Not met (Specify action/documentation required) NA Not applicable - Explain		

Indicator C1:

The grant recipient meets the definition of the term “charter school” in section 5210 of the ESEA.

Documentation: Approved charter contract, recognized non-profit status, school application, lottery policy, school policy manual.

<u>Criteria</u>	<u>Status</u>	<u>Action Required/Comments</u>
1. The school has an approved charter contract with its sponsor. Date contract signed: _____		
2. The school has recognized non-profit status as demonstrated by an approved 501(c) 3 application or organization of a Limited Liability Corporation that does not benefit any individuals or shareholders. Check type of non-profit status: _____ 501(c)3 _____ LLC Date status approved: _____		
3. The school application and all dissemination materials clearly state that the charter school is a tuition free public school.		
4. The charter school provides a program of elementary or secondary education, or both. Pre-K expenses are only allowable when the school operates an approved ESE program as part of their public education program.		
5. The school was created by a developer as a public school.		
6. The charter school has a clear lottery policy. Copy overall status from Indicator G1.		
7. All items purchased with CSP funds only benefit the students attending the charter school receiving the CSP award. CSP funds may <u>not</u> be used to support Pre-K students or any adult-education participants (GED programs).		

8. The charter school is non-sectarian in its programs, admissions policies, employment practices and all other operations and is not affiliated with a religious institution.		
9. All items purchased with CSP funds only benefit the students attending the charter school receiving the CSP award. <u>Charter schools that share facilities:</u> CSP recipients that share facilities with other charter schools at the same location demonstrate that only their students benefit from CSP-funded purchases of goods/services.		
10. The charter school contract describes how student performance will be measured and includes state assessments required of all public school students.		
11. The charter school complies with the Age Discrimination Act of 1975, Title VI of the Civil Rights Act of 1964, Title IX of the Education Amendments of 1972, section 504 of the Rehabilitation Act of 1973, and Part B of the IDEA. <i>This includes all assurances provided in Public Charter Schools Grant Application.</i>		During site visit, monitor will record any questions or concerns that may entail additional follow-up or requests for information.
Total Criteria: 11	# Met _____ # Not met _____ # N/A _____	
Key: ✓ Met – Not met (Specify action/documentation required) NA Not applicable - Explain		